

Tennessee Department of Education Bruman Group EDGAR UGG Training

February 2025 Agenda and Outline

Please note that the page numbers provided throughout this guide are based on The Bruman Group's Administrator's Handbook on EDGAR, 6th Edition, Spiral Bound version.

Applications and General Requirements

- **GEPA Sec. 441** (pg.7): Single State application
- GEPA Sec. 442 (pg.8): Single local educational agency application
- **EDGAR 76.500** (pg. 61): Constitutional rights, freedom of inquiry, and Federal statutes and regulations on nondiscrimination.
- **EDGAR 76.700** (pg.67): Compliance with the U.S. Constitution, statutes, regulations, stated institutional policies, and applications

Financial Management

- **GEPA Sec. 421** (pg.4): Availability of appropriations on academic or school-year basis; additional period for obligation of funds
- 200.302 (pg.137) Financial management
 - o **200.1** (pg.126): Period of performance
 - o 200.1 (pg.123): Financial obligation
 - o **EDGAR 76.707** (pg.69): When obligations are made
 - EDGAR 76.708 (pg.69): When certain subgrantees may begin to obligate funds
 - o **EDGAR 76.709** (pg.69): Funds may be obligated during a "carryover period"
 - EDGAR 76.710 (pg.70): Obligations made during a carryover period are subject to current statutes, regulations, and applications
- 200.303 (pg.137): Internal controls
 - 200.113 (pg.131): Mandatory disclosures
 - o **200.217** (pg. 136): Whistleblower protections
 - 200.415 (pg.156): Required certifications
- 200.210 (pg.134): Pre-awards costs
- **200.305** (pg.137): Federal payment

Bruman Group EDGAR UGG Training

- **200.306** (pg.139): Cost sharing
- 200.307 (pg.139): Program income
- 200.308 (pg.140): Revisions of budget and program plans

Procurement Standards

- 200.317 (pg.144): Procurements by States and Indian Tribes
- **200.318** (pg.144): General procurement standards
 - o **200.112** (pg.131): Conflict of interest
- **200.319** (pg.145): Competition
- **200.320** (pg.145): Procurement Methods
 - o **200.1** (pg. 125): Micro-purchase; Micro-purchase threshold
- **200.321** (pg.147): Contracting with small businesses, minority businesses, women's businesses, and labor surplus area firms
- 200.322 (pg.147): Domestic preferences for procurements
- **200.214** (pg.135): Suspension and debarment
 - 2 CFR 3485.220 (pg.93)/ 2 CFR 180.220 (pg.103): Are any procurement contracts included as covered transactions?
 - 2 CFR 180.300 (pg.104): What must I do before I enter into a covered transaction with another person at the next lower tier?
 - 2 CFR 180.305 (pg.104): May I enter into a covered transaction with an excluded or disqualified person?
 - o **2 CFR 3485.310** (pg.93)/ **2 CFR 180.310** (pg.104): What must I do if a Federal agency exclude a person with whom I am already doing business in a covered transaction?
- **200.216** (pg.136): Prohibition on certain telecommunications and video surveillance equipment or services
- **200.327** (pg.148): Contract provisions
 - Appendix II to Part 200 Contract Provisions for Non-Federal Entity Contracts Under Federal Awards (pg.191)

Property Management

- **200.313** (pg.142): Equipment
 - o **200.1** (pg.122): Equipment
- **200.314** (pg.143): Supplies
 - o **200.1** (pg.127): Supply

Bruman Group EDGAR UGG Training

Allowability

- EDGAR 76.530 (pg.62): General cost principles
- EDGAR 76.532 (pg.62): Use of funds for religion prohibited
- 200.403 (pg.155): Factors affecting allowability of costs
 - o 200.404 (pg.155): Reasonable costs
 - o 200.405 (pg.155): Allocable costs
- 200.406 (pg.155): Applicable credits
- **200.413** (pg.156): Direct costs
- **200.414** (pg.157): Indirect costs
 - o **200.1** (pg.124): Indirect cost
 - o **EDGAR 76.563** (pg.63): Restricted indirect cost rate programs covered
 - o EDGAR 76.564 (pg.63): Restricted indirect cost rate formula

Selected Items of Cost (pg.159)

- **200.421** (pg.159): Advertising and public relations
- **200.430** (pg.160): Compensation personal services
 - o **200.1** (pg.122): Cost objective
- **200.431(**pg.162): Compensation fringe benefits
- **200.432** (pg.164): Conferences
 - Frequently Asked Questions to Assist U.S. Department of Education Grantees to Appropriately Use
 Federal Funds for Food, Conferences and Meetings (pg.211)
- 200.438 (pg.167): Entertainment and prizes
- **200.439** (pg.167): Equipment and other capital expenditures
- 200.441 (pg.167): Fines, penalties, damages and other settlements
- 200.456 (pg.172): Participant support costs
 - o **200.1** (pg.126): Participant support costs
- **200.458** (pg.172): Pre-award costs
- **200.475** (pg.176): Travel costs

Closeout and Recordkeeping

- GEPA Sec. 443 (pg. 8): Records kept by recipient; full disclosure; maintenance period
- **GEPA Sec. 444:** (pg.9): Family educational and privacy rights
- **EDGAR 76.722** (pg.71): Subgrantee reporting requirements

Bruman Group EDGAR UGG Training

- EDGAR 76.730 (pg.71): Records related to grant funds
- EDGAR 76.731 (pg.71): Records related to compliance
- EDGAR 76.732 (pg.71): Records related to performance
- **200.334** (pg.151): Records retention requirements
- 200.336 (pg.151): Methods for collection, transmission, and storage of information
- **200.344** (pg.153): Closeout

Subrecipient Monitoring

- **EDGAR 76.50** (pg.55): Basic requirements for subgrants
- **200.331** (pg.149): Subrecipient and contractor determinations
- 200.332 (pg.150): Requirements for pass-through entities
 - o **200.208** (pg.134): Specific conditions
- 200.339 (pg.152): Remedies for noncompliance
- **200.340** (pg.152): Terminations

Audit Requirements

- **200.501** (pg.177): Audit requirements
- 200.508 (pg.179): Auditee responsibilities
- **200.509** (pg.180): Auditor selection
- **200.511** (pg.180): Audit findings follow-up
- **200.513** (pg.181): Responsibilities
- 200.521 (pg.187): Management decisions

Appeal Rights and Procedures

- EDGAR 76.401 (pg.61): Disapproval of an application opportunity for a hearing
- **EDGAR 76.783** (pg.71) State enforcement: State educational agency action—subgrantees opportunity for a hearing
- EDGAR 81.30 (pg.82): Basis for recovery of funds
 - o **GEPA Sec. 452:** (pg.15): Recovery of funds
- EDGAR 81.31 (pg.83): Measure of recovery
 - o **GEPA Sec. 453:** (pg.16): Measure of recovery
- EDGAR 81.32 (pg.83): Proportionality
- EDGAR 81.33 (pg.83): Mitigating circumstances
- **EDGAR 81.34** (pg.83): Notice of disallowance decision