

**Diboll Independent School District**  
**Administrative Regulation**  
Reference Policy: CBB

**State and Federal Revenue Sources**

**Education Department General Administrative Regulations (EDGAR)**

The District shall comply with all EDGAR federal regulations in the management of federal grant awards and state-administered grants, as designated by the TEA, except for the implementation of the Procurement Standards. The District has opted to delay implementation of the 2 CFR Part 200 Procurement Standards under the 3-year grace period until July 1, 2018.

The district has determined that implementing the 3<sup>rd</sup> year grace period until July 1, 2018 will provide an opportunity to continue to develop the district's written purchasing procedures as they relate to the Part 2 CFR 200 Procurement Standards.

Furthermore, the additional one year extension will provide an opportunity to focus on the development of Child Nutrition Program procurement procedures to fully comply with the Texas Department of Agriculture regulations (ARM 17) as they continue to refine the regulations and the TDA Procurement Tool. Of specific concern is the following excerpt from ARM 17 that will require research related to the conflicts between EDGAR and USDA regulations.

***EDGAR***

*CEs receiving funds through the United States Department of Education are required to follow the regulations described in the Education Department General Administration Regulations (EDGAR). While there are regulations in EDGAR that conflict with USDA regulations, in most situations CEs will find the regulations to be compatible. However, if there is a regulatory conflict, CEs are required to follow the USDA regulations for all CNP funds (income, allowable and unallowable costs, and procurement).*

The District's State and Federal Grants Manual has been developed and administratively approved by the Superintendent to ensure that all requirements of the EDGAR regulations are adhered to.

The District's documented travel and purchasing procedures shall apply to expenditures of funds subject to EDGAR.



Approved: Mrs. Vickie Thomas  
Superintendent