



POLICY COMMITTEE

Friday, May 28, 2021
2:30 P.M.

Courthouse & Government Center
Board of Commissioner's Room

AGENDA

1. Call to Order
2. Public Comment
3. New Business
 - a. Manistee County Grants Policy – Appendix A
 - b. Background Check Policy and Procedure – Appendix B
4. Old Business
5. Other items from Committee members
6. Adjournment

Manistee County Grants Policy

Manistee County does not have a centralized grants department; therefore, it is the responsibility of each department obtaining a grant to care for and be familiar with all grant documents and requirements. If a grant is Federal, the department should immediately notify the Finance Officer for inclusion in the County's Single Audit.

Grant Development, Application, and Approval

- Legislative Approval – The point at which legislative approval is required is determined by the requirements of the grant program. If the grant must be submitted by “an individual authorized by the legislative body”, then Board approval is required prior to submitting the application. Otherwise, the County Administrator (or his/her designee) is authorized to submit grant applications. If an award is given, a copy of the agreement will also be furnished to the Administrator's office.
- Matching Funds – Grants that require cash local matches must be coordinated through the Administrator's office. At a minimum, funds must be identified within the existing budget to provide the match, or a budget adjustment will be required. Depending on the nature of the grant, there may also be some policy implications that will need discussion (for example, will the grant establish a level of service that cannot be sustained once the grant funds are depleted?).
- Grant Budgets – Most grants require the submission of an expenditure budget. The approved grant budget should be provided to the County Administrator's Office for input into the financial account system.

Grant Program Implementation

- Notification and Acceptance of an Award – Official notification of a grant award is usually sent by a funding agency to the Elected Official or Department Head designated in the original grant proposal. However, the authorization to spend grant funds is derived from the Board through the approval of a grant budget, unless the resolution authorizing the grant application authorizes the County Administrator to amend the budget upon notification of the grant award.
- The award is accepted - The Elected Official or Department Head must notify the Finance Officer and supply for all Federal awards, the Catalog of Federal Domestic Assistance (CDFA) title and number, grant identification number and year, name of the Federal agency, and the name of the pass-through entity, if any. For all State and Local awards, the title and name of the grant award, the award number, year, and the pass-through entity, if any must be submitted.
- Establishment of Accounts – The department that obtained the grant will provide the Finance Officer with information needed to establish revenue and expense accounts for the project. This information will include a copy of a summary of the project and a copy of the full project budget.
- Purchasing Guidelines – All other County purchasing guidelines apply to the expenditure of grant funds. The use of grant funds does not exempt any purchase from normal purchasing requirements. All typical paperwork and bidding requirements apply. All normal staff approvals apply.

Grant Cash and Financial Management

The County's financial system and records will be sufficient for preparing required reports and for tracing expenditures to a level that establishes funds have been used according to Federal statutes, regulations, and the terms and conditions of the Federal award. This is in addition to maintaining a system of funds and accounts in accordance with state law.

The County's financial management system will:

- Identify all Federal awards received and expended, including specific information pertaining to the award: Federal program name; CFDA title and number and year; and name of Federal and any pass-through agency.
- Provide for accurate, current, and complete disclosure of the results of Federal award in accordance with reporting requirements.
- Include records and supporting documentation that identify the source and application of funds for Federally funded activities, including authorizations, obligations, unobligated balances, expenditures, assets, income, and interest.
- Enable the County to maintain effective internal controls to ensure accountability and proper safeguarding and use of all funds, property, and other assets (for example, adequate segregation of duties).
- Provide a comparison of expenditures with budget amounts for each Federal award.

Occasionally, the fiscal year for the granting agency will not coincide with the County's fiscal year. This may require adjustments to the internal budget accounts and interim financial reports as well as special handling during fiscal year-end close. It is the responsibility of the Elected Official or Department Head to bring such discrepancies to the attention of the Finance Officer at the time the grant accounts are established.

Allowable Costs for Federal Programs

Expenditures under federal programs are governed by the Federal cost principles contained in 2 CFR Part 200 Subpart E – Cost Principles. The County is committed to ensuring that costs claimed under Federal awards follow these cost principles as well as any special terms and conditions contained in the award.

When applying these cost principles, the County agrees to:

- Maintain responsibility for the efficient and effective administration of the Federal award through the application of sound management practice.
- Assume responsibility for administering Federal funds in a manner consistent with underlying agreements, program objectives and the terms and conditions of the Federal award.
- Applying accounting practices that are consistent with the cost principles, support the accumulation of costs as required by the principles, and provide for adequate documentation to support costs charged to the federal award.

The County will maintain a system of internal controls over Federal expenditures to provide reasonable assurance that Federal awards are expended only for allowable activities and that the cost of goods and services charged to Federal awards are allowable and in accordance with the above referenced cost principles. These controls will be met with the following general criteria:

- Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
- Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the County.
- Be given consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- Be determined in accordance with generally accepted account principles.
- Not be included as cost or used to meet cost sharing or matching requirements of any other federally financed program in either the current or prior period.
- Be adequately documented.

All County employees paid with Federal funds will document the time they expend in work performed in support of each Federal program, in accordance with the law. County employees will be reimbursed for travel costs incurred while performing services related to official business as a Federal grant recipient. The County will establish and maintain employee policies on hiring, benefits, and leave as approved by the Board.

Internal Controls and Accountability

The County has established several internal control procedures to ensure that:

- The grant awards are managed to comply with statutes, regulations, and the terms and conditions of the award.
- The County evaluates and monitors the grant awards to ensure compliance with statutes, regulations, and the terms and conditions of the award.
- The County shall take prompt action to correct identified instances of noncompliance including noncompliance identified in audit findings.
- The County must take reasonable measures to safeguard sensitive information and assets purchased with grant awards, consistent with privacy obligations and applicable Federal and State laws.
- Ensure adequate internal controls are in place in the handling of cash receipts from the time of receipt to deposit in the appropriate depository account.
- Established adequate internal controls and written procedures to ensure payments are made only for approved purposes.
- Maintain adequate accounting records for cash receipts and payments.

Annual Audits

If the County is required to have a single audit completed in accordance with 2 CFR Part 200 Subpart F – Audit Requirements, the County Finance Officer, will accumulate the information necessary to prepare a schedule of expenditure of Federal awards (SEFA or the "schedule") in accordance with Federal and State requirements.

- The schedule will include all Federal financial assistance. Amounts will be reported whether received directly from the Federal government or through a pass-through agency (given that the County is determined to be a subrecipient and not a vendor).
- Non-cash assistance will be identified as such in the schedule.
- The schedule will be prepared on the same basis of accounting as the related financial statements.
- Federal awards will be grouped based on Federal awarding agency. Each Federal award with current expenditures will be listed along with the CFDA number, pass-through grantor name (if applicable) and award/pass through grantor number (if applicable).
- If the CFDA number of a Federal award cannot be reasonably determined, it shall be reported in the schedule using the two-digit prefix for the related Federal agency, followed by "UNKNOWN".
- To the extent that amounts are passed through to subrecipients, such amounts will be identified on the face of the Schedule by award number.
- To the extent that a separate line item is included in the financial statement for Federal revenue, this amount shall agree to expenditures in the schedule. Any reconciling items will be disclosed in the footnotes to the schedule.

Uniform Guidance Compliance Supplement – General Information:

Board Policies. The following financial policies have been separately reviewed and approved by the Board of Commissioners. These policies may be incorporated into this document by reference. All the policies below are applicable to Federal grants where appropriate:

- Fund Balance Policy
- Credit Card Policy
- Electric Funds Transfer Policy
- Investment Policy
- Travel Policy
- Procurement Policy

2 CFR Part 200 Subpart E: Cost Principles

Noteworthy Additions or Changes for Select Items of Cost

This table is for reference purposes only and is not exhaustive of all changes or requirements; therefore, grantees are encouraged to consult the full text of the regulations in 2 CFR 200.

Reference	Title	Noteworthy Additions, Changes, or Clarifications
200.425	Audit services.	Costs associated with audits not conducted in accordance with Single Audit requirements and audits that fall below the Single Audit threshold are unallowable. Under the cost principles, those costs were allowable if included in the indirect cost rate or approved by awarding agency as a direct cost. Financial statement audit and agreed upon procedures
200.428	Collections of improper payments.	New – The costs incurred by a non-Federal entity to recover improper payments are allowable as either direct or indirect costs, as appropriate.
200.430	Compensation – personal services.	Charges for employee compensation must be based on records accurately reflecting work performed; however, no specific types of documentation (e.g., personnel activity reports) are required. Documentation standards that grantees must meet are listed. Substitute systems, if approved by cognizant Federal agency, are allowed State, local, and tribal government.
200.432	Conferences.	Requires conference hosts/sponsors to ensure that conference costs are appropriate, necessary and managed in a manner that minimizes costs to the Federal award. The costs of identifying, but not providing, locally available dependent-care resources are allowable.
200.433	Contingency provisions.	Allowable in limited circumstances, with appropriate methodology used to create estimates, and must be consistent with the cost principles and other requirements in this Part (see also Standards for Financial and Program Management of Subpart D and section 200.403 Factors Affecting Allowability of Costs); be necessary and reasonable for proper and efficient accomplishment of project or program objectives, and be verifiable from the non-Federal entity's records.
200.435	Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements.	Language streamlined for consistency and now specifically references Whistleblower Protection Act.
200.436	Depreciation.	Change to GAAP standards. Donated assets valued at time of donation and may be depreciated or claimed as matching but not both. Eliminates the use allowance method of recovering costs associated with recovering building costs.
200.437	Employee health and welfare costs.	Employee morale costs are unallowable. Costs incurred in accordance with the non-Federal entity's documented policies for

Reference	Title	Noteworthy Additions, Changes, or Clarifications
		the improvement of working conditions, employer-employee relations, employee health, and employee performance are allowable, but must be equitably distributed to all activities of the non-Federal entity .
200.438	Entertainment costs.	Unallowable unless costs have a programmatic purpose and are authorized in the approved budget for the Federal award or costs have prior written approval from the Federal awarding agency.
200.441	Fines, penalties, damages, and other settlements.	Added Tribal law violations. Now states that "alleged violations" and not just "violations" are unallowable except when they result directly from complying with the terms of a Federal award or are approved in advance by the Federal awarding agency.
200.449	Interest.	Establishes the date of January 1, 2016, as the date that non-Federal entities whose fiscal year starts on or thereafter may be reimbursed for financing costs associated with patents and computer software.
200.453	Materials and supplies costs, including costs of computing devices.	Changes/additions to definitions
200.455	Organization costs.	Unallowable to all organizations unless specific approval by the awarding Federal agency.
200.456	Participant support costs.	Defined and allowable with prior approval. The treatment of participant support costs is in the definition of modified total direct costs and in the appendices on indirect costs rates, Appendix IV to Part 200.
200.460	Proposal costs.	Changed the language that allowed for other than indirect treatment of these costs, though rule remains that these costs should normally be treated as indirect. Proposal costs of past accounting periods will be allocable to the current period
200.461	Publication and printing costs.	Resolves a long-standing issue with charges necessary to publish research results, which typically occur after expiration, but are otherwise allowable costs of an award.
200.463	Recruiting costs.	Clarifies that special emoluments, fringe benefits, and salary allowances that do not meet the test of reasonableness or do not conform to the established practices of the entity are unallowable. Specifically addresses allowability of short-term travel visa costs.
200.464	Relocation costs of employees.	Repayment of funds is required if employee resigns for reasons within the employee's control within 12 months after hire date.
200.465	Rental costs of real property and equipment	Includes "sale and lease back" and "less-than-arm's-length" restrictions and home office space.
200.469	Student activity costs.	Costs incurred for intramural activities, student publications, student clubs, and other student activities are unallowable unless specifically provided for in the Federal award.
200.474	Travel costs.	Provides that temporary dependent care costs that result directly from travel to conferences and meet specified standards are allowable.

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[View all text of Subjgrp 41 \[§ 200.420 - § 200.476\]](#)

§ 200.453 - Materials and supplies costs, including costs of computing devices.

- (a) Costs incurred for materials, supplies, and fabricated parts necessary to carry out a Federal award are allowable.
- (b) Purchased materials and supplies must be charged at their actual prices, net of applicable credits. Withdrawals from general stores or stockrooms must be charged at their actual net cost under any recognized method of pricing inventory withdrawals, consistently applied. Incoming transportation charges are a proper part of materials and supplies costs.
- (c) Materials and supplies used for the performance of a Federal award may be charged as direct costs. In the specific case of computing devices, charging as direct costs is allowable for devices that are essential and allocable, but not solely dedicated, to the performance of a Federal award.
- (d) Where federally-donated or furnished materials are used in performing the Federal award, such materials will be used without charge.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75887, Dec. 19, 2014]

AUTHORITY: 31 U.S.C. 503

SOURCE: 78 FR 78608, Dec. 26, 2013, unless otherwise noted.

CITE AS: 2 CFR 200.453



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Regulations > Title 2 > Chapter II > Part 200 > Subpart E > Subjgrp 41 > § 200.475

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§ 200.475 - Travel costs.

(a) *General.* Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-Federal entity. Such costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to an entire trip and not to selected days of the trip, and results in charges consistent with those normally allowed in like circumstances in the non-Federal entity's non-federally-funded activities and in accordance with non-Federal entity's written travel reimbursement policies. Notwithstanding the provisions of § 200.444, travel costs of officials covered by that section are allowable with the prior written approval of the Federal awarding agency or pass-through entity when they are specifically related to the Federal award.

(b) *Lodging and subsistence.* Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, must be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the non-Federal entity in its regular operations as the result of the non-Federal entity's written travel policy. In addition, if these costs are charged directly to the Federal award documentation must justify that:

(1) Participation of the individual is necessary to the Federal award; and

(2) The costs are reasonable and consistent with non-Federal entity's established travel policy.

(c)(1) Temporary dependent care costs (as dependent is defined in 26 U.S.C. 152) above and beyond regular dependent care that directly results from travel to conferences is allowable provided that:

(i) The costs are a direct result of the individual's travel for the Federal award;

(ii) The costs are consistent with the non-Federal entity's documented travel policy for all entity travel; and

(iii) Are only temporary during the travel period.

(2) Travel costs for dependents are unallowable, except for travel of duration of six months or more with prior approval of the Federal awarding agency. See also § 200.432.

(d) In the absence of an acceptable, written non-Federal entity policy regarding travel costs, the rates and amounts established under 5 U.S.C. 5701-11, ("Travel and Subsistence Expenses; Mileage Allowances"), or by the Administrator of General Services, or by the President (or his or her designee) pursuant to any provisions of such subchapter must apply to travel under Federal awards (48 CFR 31.205-46(a)).

(i) Require circuitous routing;

(ii) Require travel during unreasonable hours;

(iii) Excessively prolong travel;

(iv) Result in additional costs that would offset the transportation savings; or

(v) Offer accommodations not reasonably adequate for the traveler's medical needs. The non-Federal entity must justify and document these conditions on a case-by-case basis in order for the use of first-class or business-class airfare to be allowable in such cases.

(2) Unless a pattern of avoidance is detected, the Federal Government will generally not question a non-Federal entity's determinations that customary standard airfare or other discount airfare is unavailable for specific trips if the non-Federal entity can demonstrate that such airfare was not available in the specific case.

(f) *Air travel by other than commercial carrier.* Costs of travel by non-Federal entity-owned, -leased, or -chartered aircraft include the cost of lease, charter, operation (including personnel costs), maintenance, depreciation, insurance, and other related costs. The portion of such costs that exceeds the cost of airfare as provided for in paragraph (d) of this section, is unallowable.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75887, Dec. 19, 2014; 85 FR 49570, Aug. 13, 2020]

AUTHORITY: 31 U.S.C. 503

SOURCE: 78 FR 78608, Dec. 26, 2013, unless otherwise noted.

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terms and conditions of the Federal award, should be treated as a direct cost.

§200.474 Travel costs.

(a) *General.* Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-Federal entity. Such costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to an entire trip and not to selected days of the trip, and results in charges consistent with those normally allowed in like circumstances in the non-Federal entity's non-federally-funded activities and in accordance with non-Federal entity's written travel reimbursement policies. Notwithstanding the provisions of §200.444 General costs of government, travel costs of officials covered by that section are allowable with the prior written approval of the Federal awarding agency or pass-through entity when they are specifically related to the Federal award.

(b) *Lodging and subsistence.* Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, must be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the non-Federal entity in its regular operations as the result of the non-Federal entity's written travel policy. In addition, if these costs are charged directly to the Federal award documentation must justify that:

(1) Participation of the individual is necessary to the Federal award; and

(2) The costs are reasonable and consistent with non-Federal entity's established travel policy.

(c)(1) Temporary dependent care costs (as dependent is defined in 26 U.S.C. 152) above and beyond regular dependent care that directly results from travel to conferences is allowable provided that:

(i) The costs are a direct result of the individual's travel for the Federal award;

(ii) The costs are consistent with the non-Federal entity's documented travel policy for all entity travel; and

(iii) Are only temporary during the travel period.

(2) Travel costs for dependents are unallowable, except for travel of duration of six months or more with prior approval of the Federal awarding agency. See also §200.432 Conferences.

(d) In the absence of an acceptable, written non-Federal entity policy regarding travel costs, the rates and amounts established under 5 U.S.C. 5701-11, ("Travel and Subsistence Expenses; Mileage Allowances"), or by the Administrator of General Services, or by the President (or his or her designee) pursuant to any provisions of such subchapter must

apply to travel under Federal awards (48 CFR 31.205-46(a)).

(e) *Commercial air travel.* (1) Airfare costs in excess of the basic least expensive unrestricted accommodations class offered by commercial airlines are unallowable except when such accommodations would:

(i) Require circuitous routing;

(ii) Require travel during unreasonable hours;

(iii) Excessively prolong travel;

(iv) Result in additional costs that would offset the transportation savings; or

(v) Offer accommodations not reasonably adequate for the traveler's medical needs. The non-Federal entity must justify and document these conditions on a case-by-case basis in order for the use of first-class or business-class airfare to be allowable in such cases.

(2) Unless a pattern of avoidance is detected, the Federal Government will generally not question a non-Federal entity's determinations that customary standard airfare or other discount airfare is unavailable for specific trips if the non-Federal entity can demonstrate that such airfare was not available in the specific case.

(f) *Air travel by other than commercial carrier.* Costs of travel by non-Federal entity-owned, -leased, or -chartered aircraft include the cost of lease, charter, operation (including personnel costs), maintenance, depreciation, insurance, and other related costs. The portion of such costs that exceeds the cost of airfare as provided for in paragraph (d) of this section, is unallowable.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75887, Dec. 19, 2014]

§200.475 Trustees.

Travel and subsistence costs of trustees (or directors) at IHEs and nonprofit organizations are allowable. See also §200.474 Travel costs.

Subpart F—Audit Requirements

GENERAL

§200.500 Purpose.

This part sets forth standards for obtaining consistency and uniformity among Federal agencies for the audit of non-Federal entities expending Federal awards.

AUDITS

§200.501 Audit requirements.

(a) *Audit required.* A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit conducted for that year in accordance with the provisions of this part.

(b) *Single audit.* A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single audit conducted in accordance with §200.514 Scope of audit except when it elects to have a program-specific audit conducted in accordance with paragraph (c) of this section.

(c) *Program-specific audit election.* When an auditee expends Federal awards under only one Federal program (excluding R&D) and the Federal program's statutes, regulations, or the terms and conditions of the Federal award do not require a financial statement audit of the auditee, the auditee may elect to have a program-specific audit conducted in accordance with §200.507 Program-specific audits. A program-specific audit may not be elected for R&D unless all of the Federal awards expended were received from the same Federal agency, or the same Federal agency and the same pass-through entity, and that Federal agency, or pass-through entity in the case of a subrecipient, approves in advance a program-specific audit.

(d) *Exemption when Federal awards expended are less than \$750,000.* A non-Federal entity that expends less than \$750,000 during the non-Federal entity's fiscal year in Federal awards is exempt from Federal audit requirements for that year, except as noted in §200.503 Relation to other audit requirements, but records must be available for review or audit by appropriate officials of the Federal agency, pass-through entity, and Government Accountability Office (GAO).

(e) *Federally Funded Research and Development Centers (FFRDC).* Management of an auditee that owns or operates a FFRDC may elect to treat the FFRDC as a separate entity for purposes of this part.

(f) *Subrecipients and Contractors.* An auditee may simultaneously be a recipient, a subrecipient, and a contractor. Federal awards expended as a recipient or a subrecipient are subject to audit under this part. The payments received for goods or services provided as a contractor are not Federal awards. Section §200.330 Subrecipient and contractor determinations sets forth the considerations in determining whether payments constitute a Federal award or a payment for goods or services provided as a contractor.

(g) *Compliance responsibility for contractors.* In most cases, the auditee's compliance responsibility for contractors is only to ensure that the procurement, receipt, and payment for goods and services comply with Federal statutes, regulations, and the terms and conditions of Federal awards. Federal award compliance requirements normally do not pass through to contractors. However, the auditee is responsible for ensuring compliance for procurement transactions which are structured such that the contractor is responsible for program compliance or the contractor's records must be reviewed to

determine program compliance. Also, when these procurement transactions relate to a major program, the scope of the audit must include determining whether these transactions are in compliance with Federal statutes, regulations, and the terms and conditions of Federal awards.

(h) *For-profit subrecipient.* Since this part does not apply to for-profit subrecipients, the pass-through entity is responsible for establishing requirements, as necessary, to ensure compliance by for-profit subrecipients. The agreement with the for-profit subrecipient must describe applicable compliance requirements and the for-profit subrecipient's compliance responsibility. Methods to ensure compliance for Federal awards made to for-profit subrecipients may include pre-award audits, monitoring during the agreement, and post-award audits. See also §200.331 Requirements for pass-through entities.

[78 FR 78608, Dec. 26, 2013, as amended at 79 FR 75887, Dec. 19, 2014]

§200.502 Basis for determining Federal awards expended.

(a) *Determining Federal awards expended.* The determination of when a Federal award is expended must be based on when the activity related to the Federal award occurs. Generally, the activity pertains to events that require the non-Federal entity to comply with Federal statutes, regulations, and the terms and conditions of Federal awards, such as: expenditure/expense transactions associated with awards including grants, cost-reimbursement contracts under the FAR, compacts with Indian Tribes, cooperative agreements, and direct appropriations; the disbursement of funds to subrecipients; the use of loan proceeds under loan and loan guarantee programs; the receipt of property; the receipt of surplus property; the receipt or use of program income; the distribution or use of food commodities; the disbursement of amounts entitling the non-Federal entity to an interest subsidy; and the period when insurance is in force.

(b) *Loan and loan guarantees (loans).* Since the Federal Government is at risk for loans until the debt is repaid, the following guidelines must be used to calculate the value of Federal awards expended under loan programs, except as noted in paragraphs (c) and (d) of this section:

(1) Value of new loans made or received during the audit period; plus

(2) Beginning of the audit period balance of loans from previous years for which the Federal Government imposes continuing compliance requirements; plus

(3) Any interest subsidy, cash, or administrative cost allowance received.

(c) *Loan and loan guarantees (loans) at IHEs.* When loans are made to students of an IHE but the IHE does not make the loans, then only the value

Background Check Policy and Procedure

All offers of employment and/or appointments to Manistee County Commissions/Boards are contingent upon clear results of a thorough background check. Background checks will be conducted on all candidates and employees who are promoted, as deemed necessary.

Background checks will include:

- **Social Security Verification:** validates the applicant's Social Security number, date of birth and former addresses.
- **Prior Employment Verification:** confirms applicant's employment with the listed companies, including dates of employment, position held and additional information available pertaining to performance rating, reason for departure and eligibility for rehire.
- **Personal and Professional References:** calls will be placed to individuals listed as references by the applicant.
- **Educational Verification:** confirms the applicant's claimed educational institution, including the years attended and the degree/diploma received.
- **Criminal History:** includes review of criminal convictions and probation. The following factors will be considered for applicants with a criminal history:
 - The nature of the crime and its relationship to the position.
 - The time since the conviction.
 - The number (if more than one) of convictions.

The following additional background searches will be required if applicable to the position:

- **Motor Vehicle Records:** provides a report on an individual's driving history in the state requested. This search will be run when driving is an essential requirement of the position.

Procedure

Final candidates and/or Committee or Board appointees must complete an AUTHORIZATION TO RELEASE INFORMATION form.

The Human Resource Generalist will order the background check upon receipt of the signed release form and will notify the hiring Department Head or the Manistee County Clerk regarding the results of the check. In instances where negative or incomplete information is obtained, the appropriate management will assess the potential risks and liabilities related to the job/appointment requirements and determine whether the individual should be hired or appointed.

Background check information will be maintained in a file separate from employees' personnel files for a minimum of five years.

Manistee County reserves the right to modify this policy at any time without notice.