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WHISTLEBLOWER PROTECTIONS AND GRANT ADMINISTRATION

KEYS Grace Academy (the “Academy”) is committed to the lawful, ethical, and efficient administration of the Federal, State, and grantor funds entrusted to it. As a public charter school and recipient of Federal awards, the Academy requires its Board members, officers, the Educational Service Provider, employees, contractors, and volunteers to observe high standards of business and personal ethics in carrying out their responsibilities, to comply with all applicable laws, regulations, and award terms, and to report suspected wrongdoing without fear of reprisal. This policy works in conjunction with Policy 8900 – Anti-Fraud.

Whistleblower Protections

An employee of the Academy or Educational Service Provider may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information to the appropriate agency or individual that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract or grant. See Policy 8900 – Anti-Fraud.

Disclosures protected under this policy may be made to a member of the Academy’s Board of Directors, the School Leader, the Educational Service Provider, an Inspector General, the Michigan Department of Education, the Academy’s authorizing body, or any other Federal or State agency or official authorized to receive such information. The Academy will not tolerate retaliation in any form against an individual who, in good faith, makes such a disclosure or who participates in a related investigation, audit, or proceeding.

A report is made in good faith when the individual has a reasonable belief that the information disclosed evidences one or more of the conditions described above. A disclosure does not lose its protection because the concern is later found to be mistaken or unsubstantiated, provided it was made honestly. Allegations made maliciously, recklessly, or with knowledge that they are false are not protected and may result in disciplinary action.

Any Board member, officer, employee, contractor, or representative of the Educational Service Provider who retaliates against an individual for making a protected disclosure will be subject to disciplinary action, up to and including termination of employment or the business relationship, and may be subject to applicable legal remedies.

Grant Administration

- A. The administration of grants will adhere to all applicable Federal, State, local, and grantor rules and regulations, including the terms and conditions of the Federal awards, as well as Academy policies and administrative procedures/guidelines.
- B. The Educational Service Provider is responsible for the efficient and effective administration of grant awards through the application of sound management practices.
- C. The Educational Service Provider is responsible for administering grant funds in a manner consistent with underlying agreements, applicable statutes, regulations, and program objectives, and the terms and conditions of the grant award.
- D. The Educational Service Provider, in recognition of its unique combination of staff, facilities, and experience, shall employ internal controls and the organizational and management strategies necessary to assure proper and efficient administration of grant awards.

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- E. All Federal funds received by the Academy will be used in accordance with the applicable Federal law and regulations and the terms and conditions of the Federal award. The Educational Service Provider shall require that each draw of Federal monies be aligned with the Academy's payment process (whether reimbursement, cash advance or a combination). If funds are permitted to be drawn in advance, all draws will be as close as administratively feasible to the related program expenditures and that, when restricted, such monies are used to supplement programs and funding and not to supplant or replace existing programming or current funding. Maintenance of Effort (MOE) and Maintenance of Equity (MOEquity) requirements of the Federal program will be met in accordance with the requirements of the specific funded program. The Academy shall maintain appropriate documentation and records to substantiate compliance or to justify allowable exceptions, exemptions, or waivers.
- F. The Educational Service Provider is authorized to sign related documents for grant administration, including documents required for submittal of grant proposals.
- G. Employee positions established through the use of grant funding may terminate if and when the related grant funding ceases.
- H. Program reports including, but not limited to, audits, site visits, and final reports may be submitted to the Educational Service Provider for review and distribution to the Board and other appropriate parties.

Confidentiality

The Academy will maintain confidentiality with regard to reports of suspected misconduct and the resulting investigation to the extent consistent with the conduct of an appropriate investigation and the Academy's obligations under the Freedom of Information Act and other applicable law. The identity of an individual who makes a protected disclosure and requests confidentiality will be protected to the extent permitted by law; however, absolute confidentiality cannot be guaranteed.

Dissemination

This policy shall be made available to all Board members, officers, the Educational Service Provider, employees, contractors, and volunteers, and shall be incorporated into the Academy's policy manual and applicable staff handbooks.

Adopted
