August 18, 2015

TO THE ADMINISTRATOR ADDRESSED:

SUBJECT: Change to TEA policy regarding prior approval for selected items of cost

The purpose of this letter is notify you that TEA has made a change to an existing policy related to the use of federal grant funds. The policy requires federal grant subrecipients that intend to spend federal grant funds on certain costs to get prior approval from TEA. The existing policy was made to implement a new regulation in the Education Department General Administrative Regulations (EDGAR). However, TEA has listened to feedback from school districts and charter schools, and has reconsidered its policy. Effective immediately, for the costs of educational field trips and program-related out-of-state travel for school year 2015–2016, federal grant subrecipients do not need to receive prior approval from TEA, nor will TEA issue prior approval.

If your organization has not yet submitted a federal grant application, you must still complete all required forms related to educational field trips and program-related out-of-state travel. All forms that have already been received or that will be received will be considered by TEA as supplemental information to the federal grant application, but will not be approved by TEA staff.

NOGA and Prior Approval

Current program guidelines for individual federal grants indicate that federal grant subrecipients that submit all required forms related to educational field trips and program-related out-of-state travel can consider these costs approved when they receive their Notice of Grant Awards (NOGAs). This is no longer true. Because TEA is no longer issuing prior approval for these costs, the NOGA should not be considered as prior approval for these costs.

Even if your organization already received a NOGA before this policy change, you should not consider the NOGA as prior approval for the costs of educational field trips and program-related out-of-state travel. Please see “Maintaining Adequate Documentation” below.

Allowability for Additional Grant Programs

TEA has also reconsidered the allowability of educational field trips and program-related out-of-state travel for certain grant programs that did not previously allow these costs. Under specific conditions, these grant program funds may now be used to pay for educational field trips and program-related out-of-state travel. TEA will soon publish additional details about which programs now allow educational field trips and program-related out-of-state travel, as well as the new specific conditions.

Maintaining Adequate Documentation

Please note that while TEA is no longer requiring or issuing prior approval for the costs of educational field trips and program-related out-of-state travel, federal grant subrecipients must comply with the terms and conditions of federal grants and are responsible for demonstrating
that these costs are allowable, allocable, reasonable, and necessary. All federal grant subrecipients must maintain adequate supporting documentation for their independent auditors and for TEA monitors.

**More Communication**

TEA will publish more information about specific aspects of this policy change. TEA will issue erratas to change current program guidelines for specific federal programs, will update its [EDGAR FAQ web page](http://www.edgarfaq.com), and will issue email bulletins to subscribers in order to reach as wide an audience as possible. Please share this letter with relevant staff in your organization, such as federal program directors and business office staff.

**For Further Information**

We hope that the policy change provides all federal grant subrecipients with increased flexibility with the use of their federal funds. If you have questions about this letter, please contact the [TEA Help Desk](http://www.tea.org) and enter either “field trips” or “out-of-state travel” in the subject field.

Sincerely,

Lizzette C. González Reynolds
Chief Deputy Commissioner

LCGR/tr