



# United States Department of the Interior

BUREAU OF INDIAN EDUCATION  
Washington, D.C. 20240

## National Policy Memorandum

### Office of the Director

**Number:** NPM-EDUC-32 A2

**Effective:** 9/13/2021

**Expires:** 9/13/2022

**Title:** Tribally Controlled School Grants Act (TCSGA) Grant File Location, Organization, and Retention Policy – Amendment 2

### 1. Purpose

The purpose of this memorandum is to extend NPM-EDUC-32 A1, TCSGA Grant File Location, Organization, and Retention Policy – Amendment 1, issued on September 16, 2020, for one additional year. This policy is to ensure that the Bureau of Indian Education (BIE) Associate Deputy Director (ADD) for Navajo and Tribally Controlled Schools and their associated Education Resource Center (ERC) personnel comply with the grant file location, organization, and retention requirements.

BIE personnel must maintain grant files in an organized and standardized manner to ensure documentation is consistent and files are easily tracked and located.

### 2. Scope

This policy applies to all BIE ADD and ERC personnel handling TCSGA grants as authorized by P.L. 100-297, as amended.

### 3. Policy and Procedure

All TCSGA grant files will be maintained in a central location, with an appropriate nomenclature and numbering system pursuant to Indian Affairs recordkeeping requirements. Only those grant files that are currently being worked on may be held in the workspace of an assigned employee, but must be stored in a secure, locked location at the end of each work day. Once an employee no longer has a need to work on the grant file, it must be returned to a central grant file location within the appropriate office.

Each grant file must be assembled in the required Five Part Classification (straight cut) File Folder structure (see Attachment 1). The mandatory format will ensure conformity on a nationwide basis.

ADD and ERC personnel and officials (Awarding Officials and Awarding Officials Technical Representatives) must adhere to the rules and regulations governing TCSGA grants, specifically:

- P.L.100-297, as amended; and
- 25 CFR 44, Grants Under the Tribally Controlled Schools Act.

#### 4. Roles and Responsibilities

- A. **Office of the Director, BIE** is responsible for the oversight of the Office of the Chief Academic Officer’s administration of TCSGA related services.
- B. **Office of the Chief Academic Officer** is responsible for the policy and oversight of ADD and ERC administration of TCSGA related services.
- C. **ADD – Navajo Schools** is responsible for the policy and oversight of its ERC personnel administering TCSGA grants and ensures the policy is being followed by completing program reviews.
- D. **ADD – Tribally Controlled Schools** is responsible for the policy and oversight of its ERC personnel administering TCSGA grants and ensures the policy is being followed by completing program reviews.
- E. **Education Program Administrators (EPAs)** are responsible for assembling complete grant files using the prescribed nomenclature and other guidance provided herein; maintaining and adequately securing working files; and transferring completed grant files to a pre-determined filing location with their respective ERC offices. EPAs are also responsible for ensuring that support staff within their ERC offices likewise follow the prescribed nomenclature and other guidance provided herein.

#### 5. Approval

TONY DEARMAN Digitally signed by TONY DEARMAN  
Date: 2021.09.13 12:55:31 -04'00'

9/13/21

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Tony L. Dearman  
Director, Bureau of Indian Education

Date

## Attachment 1

<b>1-A</b>	<b>Tab Title: Pre-Grant Award Phase</b>
1A	Tribe/Tribal Organization Grant Application – (including grant assurance statements)
2A	Tribal Resolution(s)
3A	TCSGA Application Checklist
4A	Acknowledgment Letter
5A	AOTR/SAOTR(s) Designation Memorandums and Certifications
6A	Management Systems
	<input type="checkbox"/> Financial <input type="checkbox"/> Procurement <input type="checkbox"/> Property
7A	Declination Letter (if applicable)
8A	Award Letter – (Signed by Approving Official)
9A	SAM – System for Award Management – Verified, Printed and Filed

**Attachment 1 (continued)**

<b>2-B</b>	<b>Tab Title: Post Award Phase - Correspondence</b>
1B	Tribal/Tribal Organization Formal Correspondence
2B	Correspondence to Tribe/Tribal Organization

**Attachment 1 (continued)**

<b>3-C</b>	<b>Tab Title: Purchase Request – Fund Availability Certifications</b>
1C	Purchase Requisition w/supporting documents
2C	Fund Availability Reports/FED's

**Attachment 1 (continued)**

<b>4-D</b>	<b>Tab Title: Reporting/Monitoring</b>			
<b>1D</b>	SF-425 Financial Reports:			
	Year 1		Due Date	Date Received
		1 <sup>st</sup> Quarter		
		2 <sup>nd</sup> Quarter		
		3 <sup>rd</sup> Quarter		
	4 <sup>th</sup> Quarter			
	Year 2		Due Date	Date Received
		1 <sup>st</sup> Quarter		
		2 <sup>nd</sup> Quarter		
		3 <sup>rd</sup> Quarter		
	4 <sup>th</sup> Quarter			
	Year 3		Due Date	Date Received
1 <sup>st</sup> Quarter				
2 <sup>nd</sup> Quarter				
3 <sup>rd</sup> Quarter				
4 <sup>th</sup> Quarter				
<b>2D</b>	Annual Grant Assurance Statements			
	Annual Reports:                    FY _____ to _____			
<b>3D</b>	Year		Due Date	Date Received
		One		
		Two		
		Three		
<b>4D</b>	Special Reports (if applicable)			
<b>5D</b>	Site Visits:			
	Year		Date	
		One		
		Two		
Three				

**Attachment 1 (continued)**

6D	AOTR/SAOTR(s) Monitoring Plan(s)		
7D	Electronic Reporting Requirements (if applicable)		
	Year		Date
		One	
		Two	
Three			

**Attachment 1 (continued)**

<b>5-E</b>	<b>Tab Title: Retrocession/Revocation/Reassumption Grant Close-Out</b>
	<b><i>TCSGA Non-Construction</i></b>
1E	Final Financial Status Report (SF-425)
2E	Final Grant Reconciliation: Verify obligations and advance payments in FBMS match payment disbursements and grant amount.
3E	Disposition of Property
4E	Release of Claims Form – DI-137 (Rev. March 2017)
5E	AOTR/SAOTR recommendation to retrocede/revoke/reassume direct operation and close grant
5F	Tribal correspondence regarding retrocession/revocation/reassumption
5G	Tribal Resolution Regarding Retrocession/Revocation/Reassumption ( <i>if applicable</i> )
5H	TCSGA Retrocession/Revocation/Reassumption Grant Close Out Checklist
	<b><i>TCSGA Construction</i></b>
5I	Final Grant Financial Reconciliation: Obligation and Mods less expenditures, Advance Payments less expenditures, and adjustments to payments if necessary
5J	De-Obligation of Funds Modification ( <i>if applicable</i> )



**Attachment 1 (continued)**

5K	AOTR Final Inspection & Recommendation for Acceptance ( <i>if applicable</i> )
5L	Final Acceptance and Retrocession/Revocation/Reassumption Grant Close Out Memorandum
5M	Verification of Red Line Drawings Received
5N	TCSGA Retrocession/Revocation/Reassumption Grant Close Out Checklist