

**Virginia Department of Education
Office of Program Administration and Accountability**

Record of Title I, Part A, Inventory

The U.S. Department of Education (USED) provides regulations for federal grant administration through the Education Department General Administrative Regulations (EDGAR). [Title 34, Code of Federal Regulations \(CFR\)](#), provides regulations for Title I, Part A. According to these regulations:

- Effective control and accountability must be maintained for all grant and subgrant cash, real and personal property, and other assets.
- Grantees and subgrantees must adequately safeguard all such property and must assure that it is used solely for authorized purposes.

Procedures should be in place to ensure that: all equipment and other non-consumable assets are inventoried and properly tagged; adequate safeguards are in place related to loss, damage, or theft; and maintenance procedures are in place to keep assets in good condition. A physical inventory must be taken and the results reconciled with the inventory records at least once every two years; however, annual updates to the inventory are recommended. The Title I, Part A, sample inventory form may be used to support the inventory management process. School divisions may develop their own templates to track Title I, Part A, inventory. The elements addressed in the sample template should be included in locally-developed templates.

Disposition

When equipment is no longer needed for Title I, Part A, it may be withdrawn (sold, transferred to other federal programs, or otherwise disposed of). According to the regulations:

- Items of equipment with a current per-unit fair market value of less than \$5,000 may be retained, sold or otherwise disposed of with no further obligation to the awarding agency.
- Items of equipment with a current per-unit fair market value in excess of \$5,000 may be retained or sold and the awarding agency shall have a right to an amount calculated by multiplying the current market value or proceeds from sale by the awarding agency's share of the equipment.

Divisions disposing of assets with a fair market value of less than \$5,000 should follow appropriate disposal procedures and should maintain a record of all dispositions on the Title I, Part A, inventory form. Divisions wishing to dispose of assets with a fair market value of \$5,000 or more per unit should complete the disposition request form and should submit the completed form, signed by the division superintendent, to the Office of Program Administration and Accountability for approval. Upon approval, the items may be disposed of, the disposition should be recorded on the inventory form, and the approved inventory disposition request form should be attached to the inventory form.