



# TITLE II, PART A LEA HANDBOOK



A Guide for Using Title II, Part A  
to Support Effective Instruction in Georgia



## DISCLAIMER

This handbook is provided as a resource for Georgia Local Education Agencies administering the Title II, Part A Supporting Effective Instruction State Grant. It is intended to provide coordinators with uniform practices to govern professional activities and implementation of this Federal program. This handbook is not intended to replace the legislation, regulations, and U.S. Department of Education (ED) Non-Regulatory Guidance. Therefore, it is highly recommended that coordinators consult the appropriate resources available online for complete guidance and regulations. In addition, all LEAs and coordinators responsible for implementing this Federal program must abide by current laws, regulations, and administrative procedures, ED guidance, and the Education Department General Administrative Regulations (EDGAR). This handbook is considered a working draft and is reviewed and updated as policies and procedures change and, at a minimum, is reviewed yearly. For more information, contact a Title II, Part A Education Program Specialist.

Ultimately, the GaDOE expects LEAs to use local autonomy granted under charter and strategic waiver law and SBOE rules to make the best decisions for their students, their staff and their community while taking into consideration related federal, state and local requirements and local capacity (LEA human and fiscal resources). Given the flexibility granted to Georgia LEAs under approved charter and strategic waiver applications, guidance provided by the Department may vary from LEA to LEA.

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12.7.21	• Revised – Function/Object Codes 2213 441, 442, and 443

10.14.21	<ul style="list-style-type: none"> <li>• Updated systems framework logo on cover</li> </ul>
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02.15.19	<ul style="list-style-type: none"> <li>• Added – Clarification in the Function and Object Code Quick Guide on the use of 2213-890 to include reimbursement for private school travel. This ensures the budgeting and payment of private school travel does not conflict with CS1 reconciliation for salary and travel reporting to the state.</li> </ul>

## **ADMINISTERING TITLE II, PART A IN GEORGIA**

### **1.1 Title II, Part A Purpose**

*ESEA Section 2001*

The mission of the Georgia Department of Education (GaDOE) is to educate Georgia's future by graduating students who are ready to learn, ready to live, and ready to lead. Led by our State School Superintendent, the goal is to improve educational outcomes and expand learning options for Georgia's public PK-12 students. To accomplish this, we need effective communication, meaningful collaboration, a focus on the whole child, and classroom-centered policies and practices.

Federal Programs serve as a supplemental programmatic and fiscal support for this mission. Federal Programs provide high quality service while fostering collaboration, innovation, and support. Title II, Part A provides supplemental support for Georgia's teachers, principals, and other school leaders to improve educational outcomes and expand educational options for Georgia's PK-12 students.

#### **Section 2001 [20 USC 6601]: TITLE II, PART A PURPOSE**

The purpose of this title is to provide grants to State educational agencies and subgrants to local educational agencies to—

- (1) increase student achievement consistent with the challenging State academic standards;
- (2) improve the quality and effectiveness of teachers, principals, and other school leaders;
- (3) increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; **and**
- (4) provide low-income and minority students greater access to effective teachers, principals, and other school leaders.

### **1.2 LEA Coordinator Responsibilities**

In general, Federal Programs Coordinators are responsible for the programmatic and fiscal implementation of federal programs in the Local Education Agency (LEA).

- Program Knowledge: Familiarize self and staff with relevant federal and state laws, regulations, and guidance. Attend trainings (in person and virtually) when offered.
- Program Administration and Documentation: Administer the program as outlined in the approved LEA plan and budget. Collect and maintain all relevant supporting documentation.
- Resources: Request access and utilize various programs and resources
  - GaDOE Website (Federal Programs Handbook and Resources, Title II, Part A Guidance and Resources, etc.)
  - GaDOE Portal (Consolidated Application (ConApp), Grants Accounting Online Reporting System (GAORS), Monitoring, Self-Monitoring, Equitable Services for Private Schools (ES4PS), State Longitudinal Data System (SLDS)
  - LEA Reporting (Effectiveness, Equitable Access to teachers for low-income and minority students, Annual Retention rates of effective and ineffective teachers, principals, or other school leaders)
  - Other Resources (GOSA, Georgia Insights, etc.).
- Knowledge of the general and programmatic application assurances, agreed upon by the LEA via Superintendent sign-off (Located in ConApp and Federal Programs Handbook)

### **1.3 Technical Assistance**

In Georgia, technical assistance follows the GaDOE adopted Systems of Continuous Improvement and is offered through program staff and resources. The Office of Federal Programs, the Office of Teaching and Learning, and the Office of School Improvement work collaboratively to provide LEAs guidance and joint trainings on comprehensive needs assessment, fiscal guidance, monitoring, school improvement, evidence-

based practices and professional development. In addition, program specialists are available in all areas to provide training and customized technical assistance.

## 1.4 Applicable Statutes, Regulations and Guidance

### Federal Programs Handbook

Federal Grants are subject to Federal laws and any additional requirements specified in state laws. In addition, GaDOE expects LEAs to be familiar with and abide by all federal and state regulations and guidance. The following resources are the most commonly applicable to federal programs in Georgia.

- *Elementary and Secondary Education Act of 1965 (ESEA) as amended by Every Student Succeeds Act, 2015 (ESSA)*
- The Official Code of Georgia (OCGA) - Title 20 Education  
(Also reference SBOE Board Rules and GaPSC Rules)
- GEPA: General Education Provisions Act Section 421
- EDGAR: Education Department Guidance and Regulations
  - 34 CFR Part 75 Direct Grant Programs
  - 34 CFR Part 76 State-Administered Programs
  - 34 CFR Part 77 Definitions that Apply to Department Regulations
  - 34 CFR Part 81 The General Education Provisions Act
  - 34 CFR Part 299 General Provisions
  - 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards
  - 2 CFR Part 3474 ED Acceptance of UAR
  - Annually updated Audit Compliance Supplement
- Non-Regulatory Guidance
  - ESSA Guide to School Climate Resources 2019
  - Cost Allocation Guide for State and Local Governments, 2019
  - ESSA Digital Teaching and Learning Guidance, 2017
  - ESSA Early Learning Guidance, 2016
  - ESSA Fiscal Changes and Equitable Services Guidance, 2016
  - ESSA Title II, Part A Guidance, 2016
  - ESSA Schoolwide Guidance, 2016
  - ESSA Using Evidence to Strengthen Education Investments Guidance, 2016
  - ESSA Equitable Services Guidance, 2016
  - NCLB Equitable Services, 2009
- ED Policy Letters & White House Executive Orders
  - 12731 – Principles of Ethical Conduct for Government Officers and Employees (Ethics, Fraud Waste, Abuse, Corruption and Conflict of Interest) (1990)
  - 12549—Debarment and Suspension (1986)
  - 12689—Debarment and Suspension (1989)
  - OMB: FAQs on Uniform Administrative Requirements (07.2017)
  - ED: FAQs on Uniform Administrative Requirements (03.2016)
  - ED Dear Colleague Policy Letters
- USGAO Standards for Internal Control in the Federal Government (2014)



# ELIGIBILITY, ALLOCATIONS AND AVAILABILITY

## **2.1 LEA Federal Programs Eligibility**

ESSA Sec. 8101(30); 34 CFR Part 77.1 (c); O.C.G.A. §160-5-1-.36

### ESSA

#### **(30) LOCAL EDUCATIONAL AGENCY—**

- (A) **IN GENERAL.**—The term “local educational agency” means a public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or of or for a combination of school districts or counties that is recognized in a State as an administrative agency for its public elementary schools or secondary schools.
- (B) **ADMINISTRATIVE CONTROL AND DIRECTION—**The term includes any other public institution or agency having administrative control and direction of a public elementary school or secondary school.

### 34 CFR Part 77

#### **Local educational agency means:**

- (a) A public board of education or other public authority legally constituted within a State for either administrative control of or direction of, or to perform service functions for, public elementary or secondary schools in:
- (1) A city, county, township, school district, or other political subdivision of a State; or
  - (2) Such combination of school districts or counties a State recognizes as an administrative agency for its public elementary or secondary schools; or
- (b) Any other public institution or agency that has administrative control and direction of a public elementary or secondary school.
- (c) As used in 34 CFR Parts 400, 408, 525, 526 and 527 (vocational education programs), the term also includes any other public institution or agency that has administrative control and direction of a vocational education program.

### Official Code of Georgia Annotated

A Local Educational Agency (LEA) is a local school system pursuant to local board of education control and management. In Georgia, this applies to traditional school LEAs, state and commission approved charter schools, and, by Georgia special statutes, the Department of Juvenile Justice (O.C.G.A. §49-4A-12) and the Department of Corrections (O.C.G.A. §42-2-5.1).

LEA eligibility outside the above-mentioned entities is handled on case-by-case basis by the GaDOE Federal Programs Staff, the GaDOE Legal Counsel and Guidance from ED.

## **2.2 SEA & LEA Allocations**

ESSA Sec.2001, 2102; Federal Programs Handbook; Audit Compliance Supplement; 34 CFR Part 76, Subpart H

### State Education Agency (SEA) Allocations

SEA allocations are determined using a formula outlined in ESSA. The state formula is determined using current funding levels, SEA hold harmless percentages and SEA population and poverty data as provided by the Census Bureau. The Title II, Part A allocation formula outlined in ESSA will continue to change through 2024.

	SEA % of 2001 Hold Harmless	SEA Population	SEA Poverty	LEA Population	LEA Poverty
<b>2020-2021</b>	42.84%	20%	80%	20%	80%
<b>2021-2022</b>	28.55%	20%	80%	20%	80%
<b>2022-2023</b>	14.26%	20%	80%	20%	80%
<b>2023-2024</b>	0%	20%	80%	20%	80%

## LEA Allocations

Title II, Part A is a formula allocation. Allocations are calculated using poverty and population census data provided by U.S. Department of Education (ED). The provision of equitable services is also defined in law and non-regulatory guidance. In Georgia, guidance for equitable services is collaboratively developed across programs with the State Ombudsman and can be accessed through both the Federal Programs website and the Ombudsman website.

In addition, the GaDOE may make adjustments for the opening and closing of state-approved charter school LEAs. State-approved charter school LEAs are forward-funded for projected enrollment and grade-level expansion. Allocations are adjusted during the school year as needed following a review of projected enrollment and poverty data and actual enrollment and poverty data as determined by the October GaDOE collection of FTE information.

## LEA Reallocations

Non-Regulatory Guidance states that a SEA may reserve unclaimed funds for state activities unless, in doing so, the SEA would end up reserving an amount of Title II, Part A funds for state activities that is in excess of the limits contained in ESEA section 2101(c)(1) – (3).

Because Georgia reserves the full amount of Title II, Part A state activities and administrative funds, unclaimed funds and adjustments due to changes in state-approved charter school LEA enrollment determined by the GaDOE October FTE count in the current year are reallocated during the current fiscal year to all LEAs based on a formula outlined in ESSA Section 2102. The federal formula for LEAs is 20 percent allocated based on 5-17 population and 80 percent based on poverty, both determined using the annual U.S. Census Bureau Small Area Population Estimates (SAPE) report.

34 CFR Part 76.791-793

GaDOE Webinar Allocations series ([PPT](#), [Recording](#))

## Reductions and Additional Allocations

Reductions in allocations and additional allocations are based on the same formula and applied during the current fiscal year.

## School Allocations

Under ESSA Section 2102, LEAs must use a portion of their federal dollars to address gaps in equity and support schools identified by states for improvement. As of December 2018, in consultation with ED: Accordingly, an LEA must prioritize funds to schools served by the agency who are state identified as [Comprehensive Support and Improvement (CSI)/Targeted Support and Improvement (TSI)]. However, an LEA has discretion in how it prioritizes to these schools. For example, an LEA might allocate all or part of its Title II, Part A funds only to CSI schools, or to CSI and TSI schools, because those schools have the greatest need for Title II, Part A funds to improve academic achievement. On the other hand, an LEA might look at the needs of CSI and TSI schools, consider all the funds from various sources available to meet those needs, and determine that, due to other available resources, a CSI or TSI school does not need priority for Title II, Part A funds. This would then make the Title II, Part A funds available to other priority schools in the LEA. LEAs without TSI/CSI schools who allocate to the school level must prioritize in accordance with Title II, Part A Intent and purposes. Specifically, LEAs should prioritize funds to increase student achievement and provide low-income and minority students greater access to effective teachers. In Georgia, LEAs who choose to allocate to the school level, must demonstrate this prioritization with budget submission. There is not one method for determining allocations. LEAs should choose a methodology that most closely aligns with the LEA's needs and resources and still in compliance with the law. (*Refer to additional guidance from ED below*)

## Additional Guidance on Prioritization of Funds

### **GaDOE Original Question 04.20.18:**

ESSA Title II, Part A Section 2102(b)(2)(C) asks for “A description of how the local educational agency will prioritize funds to schools served by the agency that are implementing comprehensive support and improvement activities and targeted support and improvement activities under section 1111(d) and have the highest percentage of children counted under section 1124(c).” While Georgia has chosen to use a strict

interpretation of this statement and asked LEAs to provide a description of how they will prioritize Title II, Part A funds, we would like to know whether the Department believes this applies to 'Title II, Part A funds' or any funds available to the LEA. If this applies to any funds available to a LEA, is a LEA still required to prioritize Title II, Part A Funds to high poverty schools identified for comprehensive and targeted support or do they have the flexibility to strategically coordinate all available funds?



**ED Original Response 08.02.18 from Pat Rattler:**

Regarding prioritization of funds under Title II, Part A, you may choose to exercise flexibility among other programs. The only requirement under 2102(b)(2)(C) is with regard to Title II, Part A.

**GaDOE Follow-Up 11.01.18:**

We are almost through our budget season and the question I asked you several months ago came up a couple more times. In speaking with several senior staff here in GA, we thought maybe I could try to ask you the question again but give you a scenario that we might come across. Example: We have a LEA with 2 elementary schools, 2 middle schools and 1 high school who receive several types of federal funds. All the elementary and middle schools are Title I and one of the middle schools is identified for Targeted Support. If that LEA prioritizes other federal or local funds for professional development to the middle school that is identified and wants to keep Title II at the district office level to pay for PD for all schools, would that be allowable if the LEA provides proof of prioritizing other funds and a justification?



**ED Follow-Up Response 12.21.18 from Melissa Siry:**

In response to your question, under ESEA section 2102(b)(2)(C), an LEA must describe in its local application for Title II, Part A funding “how the local educational agency will prioritize funds to schools served by the agency that are implementing comprehensive support and improvement activities and targeted support and improvement activities under section 1111(d) and have the highest percentage of children counted under section 1124(c).” Accordingly, an LEA must prioritize using Title II, Part A funds for CSI and TSI schools. However, an LEA has discretion in how it will prioritize these schools. For example, an LEA might allocate all or part of its Title II, Part A funds only to CSI schools, or to CSI and TSI schools, because those schools have the greatest need for Title II funds to improve academic achievement. On the other hand, an LEA might look at the needs of its CSI and TSI schools, consider all the funds from various sources available to meet those needs, and determine that, due to other available resources, a CSI or TSI school does not need priority for Title II, Part A funds. This would then make the Title II, Part A funds available to other priority schools in the LEA.

## 2.3 Grant Allocation Notification (GAN)

### *Federal Programs Handbook*

LEA Title II, Part A Grant Award Notifications (GANs) are created immediately following the Georgia State Board of Education’s approval, typically in July and August. The LEA Title II, Part A GANs are then loaded to the general attachment tab on the consolidated application in the MyGaDOE portal. All LEAs receiving Title II, Part A allocations must adhere to the following:

#### ED Terms and Conditions

- The Office of Management and Budget (OMB) requires all Federal agencies to assign a Federal Award Identifying Number (FAIN) to each of their financial assistance awards
- The negotiated indirect cost rate approved for the LEA applies to this grant award.
- The grant award is made subject to the provisions of all applicable acts, regulations and assurances. This grant is also subject to the provisions in the Education Department General Administrative Regulations (EDGAR) in 34 CFR Parts 76, 77, 79, and 81 and 2 CFR 3485, and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in 2 CFR Parts 200 and 3474.
- Under the “Tydings Amendment,” Section 421(b) of the General Education Provisions Act (GEPA), 20 USC 1225(B), any funds that are not obligated at the end of the federal funding period shall remain available for obligation for an additional period of 12 months.
- GAN ATTACHMENTS: The LEA must also comply with 2 CFR 200.512 (Single Audit Requirements), 2 CFR 175 (Trafficking in Persons), The Federal Funding Accountability and Transparency Act, Division H

Title V, Section 505 of Public Law 115-141, Consolidated Appropriations Act, 2019 (Disclosing Federal Funding in Public Announcements), Executive Order 13513 (Federal Leadership on Reducing Text Messaging While Driving), 2 CFR 25.110 & 2 CFR part 25, subpart C (System for Award Management and Universal Identifier), the Memorandum to ED Grantees Regarding the Use of Grant Funds for Conferences and Meetings and ESEA Section 8546 (Prohibition on Aiding and Abetting Sexual Abuse) .

### Georgia Terms and Conditions

- LEAs must ensure that appropriate documentation is maintained for auditing and monitoring purposes.
- LEAs receiving funds under Title II, Part A must agree to participate in evaluation studies conducted by ED, the GaDOE, or entities acting on behalf of either agency for data reporting in accordance with the ESEA. In addition, it is the responsibility of the LEA to ensure the accuracy and timeliness of any data submitted from the LEA. The LEA should have policies and procedures on data collection, verification, reporting and publishing to ensure adequate controls are in place.
- LEAs must permit the Georgia Department of Education and auditors to have access to the LEA's records and financial statements as necessary for the Department to meet the requirements of 2 C.F.R. Part 200.332.
- In accordance with 2 C.F.R. Part 200.415(a), LEAs are required to assure that expenditures are proper and in accordance with the terms and conditions of the federal award and approved grant budgets, the annual and final fiscal reports or vouchers requesting payment under the agreements must include a certification, signed by an official who is authorized to legally bind the non-federal entity, which reads as follows: I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812). In Georgia, the expectations for the drawdown of funds is outlined in the May 2017 GaDOE Position Paper on Drawdowns. LEAs must meet Cash Management Improvement Act requirements.

### **2.4 Maintenance of Effort (MOE)**

*ESSA Sec. 8521 [20 USC §7901], Federal Programs Handbook*

ESSA addresses the LEA's responsibility to maintain local funding. If a LEA fails to maintain fiscal effort, the State Education Agency may be required to reduce the current year allocation. Calculations to determine MOE are done at the State Level in compliance with Federal requirements. GaDOE Title I, Part A program staff (on behalf of all Federal programs) works collaboratively with GaDOE Finance and Business to determine if LEAs have met this requirement. If an LEA has not met MOE, this is communicated to applicable programs and addressed in a SBOE meeting. Requirements are further explained in the *Federal Programs Handbook – Information Applicable to All Federal Programs*.

### **2.5 Supplement Not Supplant Provision**

*2 CFR §200.403(d); ESEA/ESSA, Sec. 2301, 8521(c); Federal Programs Handbook; Audit Compliance Supplement; SBOE Rule §160-5-1-.22*

Federal law states that, "Funds made available under this title shall be used to supplement, and not supplant, non-federal funds that would otherwise be used for activities authorized under this title."

To clarify, Title II, Part A funds may be used only to supplement educational program activities provided with state and local funds. The LEA may not use Title II, Part A funds to pay for activities that, in the absence of these funds, would be provided with state and local funds. Title II, Part A funds may be used to fund only the professional development activities that supplement those mandated locally or by the state and can supplement those discretionary professional development activities that the LEA would fund in the absence of other local and/or state funding sources.

Title II, Part A may not be used to fund positions that are required under OCGA or SBOE Rule 160-5-1-.22.

In the following instances, it is presumed that supplanting has occurred if:

- The LEA used Federal funds (except Bilingual) to provide services that were required under other Federal, state or local laws.

*Note: The rule is that all available local, state, or non-federal funds must be spent to provide a service required under other Federal, state, or local laws before funds may be used to provide that service. For example, suppose that a state law requires and funds professional development to improve teacher knowledge of core academic subjects, which is an allowed local use of Title II, Part A funds under ESEA/ESSA Sec. 2103(b). LEAs would be expected to expend all state funds first, after which they could use funds for additional professional development of this sort – which is supplementing. Otherwise, if Title II, Part A funds were used while state funds were still available, the ED would presume that the Title II, Part A funds were being used to free up the state funds for other uses – which is supplanting.*

- The LEA used Federal funds to provide services that were provided with non-federal funds in the prior year.

These presumptions are rebuttable if the LEA can demonstrate that it would not have provided the services in question with non-federal funds had the Federal funds not been available.

### Precipitous Decline: Documenting the LEA is Supplementing and Not Supplanting Funds

The LEA's finance department should consult with the GaDOE if it is faced with precipitous decline. On a program level, if it appears that there is a question as to whether or not the LEA is supplanting in a case of precipitous decline, the Title II, Part A Program Office recommends that LEAs write a narrative explaining how funds will be used to supplement the current fiscal year budget that has been reduced since the previous year. These items, along with supporting documentation, should be placed in a file that would be available in the event of an audit. Coordinators should discuss the local circumstances with their Title II, Part A specialist to determine if supplementing with Title II, Part A funds is viable in the event of fund reductions from other sources.

Requirements are further explained in the [Federal Programs Handbook – Information Applicable to All Federal Programs](#).

### **2.6 Grant Availability: Period of Performance, Carryover & the Tydings Amendment**

**2 CFR §200.1,309, 403(h) [20 USC §1225]; 34 CFR §76.707-709; ESEA sections 1117(a)(4)(B), 1117(b), 8501(a)(4)(B) and 8501(c); 2016 Non-Regulatory Guidance (Fiscal Changes); GEPA Section 421; Federal Programs Handbook; Equitable Services Consultation Guide and Handbook**

#### Period of Performance

Funds remain available for obligation for a period of 27 months beginning July 1. This 27-month period includes an initial 15-month period of performance and an automatic 12-month extension permitted under the “Tydings Amendment”. As an example, funds appropriated for FY22 first become available to the states on July 1, 2021 and remain available for obligation through September 30, 2023.

In Georgia, allocations to LEAs are approved by the State Board of Education. Regardless of when LEAs are notified of their grant allocation, grantees may begin to obligate funds beginning as early as July 1 of the Federal fiscal year. However, all expenditures must align to the LEA's approved grant application/ budget and may not be drawn down until a budget is approved. Failure to spend at least 85% of the LEA's allocation may result in increased risk.

When the period of performance for obligation ends, grantees may not incur any further obligation. In Georgia, LEAs are given 30 days to liquidate (October 30) to allow the GaDOE to complete the reporting necessary for the Federal government. Period of performance is programmed into the Consolidated Application and is regulated for Federal programs by Grants Accounting to ensure First In, First Out accounting principles.

#### Carryover

Congress adopted the Tydings Amendment as incorporated in the General Education Provisions Act (GEPA) Section 421. The amendment provides education agencies additional time to spend the Federal funds they receive. Based on the Tydings Amendment, the Education Department General Administrative Regulations

(EDGAR) allows grantees to carryover for one additional year any Federal education funds that were not obligated in the period for which they were appropriated. As mentioned before, in grants that are forward-funded, grantees have up to 27 months to obligate appropriated funds beginning as early as July 1 of the Federal fiscal year.

After the Title II, Part A completion report for the initial grant cycle is finalized and the LEA has an approved original budget, carryover money is placed by GaDOE Grants Accounting into the portal. A budget amendment combining the carryover funds with the current fiscal year allocation must be submitted to the GaDOE through the consolidated application. LEAs are strongly encouraged to submit carryover amendments as soon as funds are made available. LEAs may not obligate carryover funds until the carryover amendment is approved. Carryover funds must be used in accordance with the Federal statute and corresponding regulations. LEAs are encouraged to expend the funds in the year in which they are allocated. New LEAs will not have carryover funds as they did not have an allocation from the previous year.

Requirements are further explained in the [Federal Programs Handbook – Information Applicable to All Federal Programs](#). Private School carryover is explained in [Section 5 of this Handbook](#).

# GRANT APPLICATION AND BUDGETING

## **3.1 CLIP: Consolidated LEA Improvement Plan (CLIP)**

*ESSA Sec. 8305; ESSA Sec. 2102(1)(3)(A-B); 2 CFR 76.301; Federal Programs Handbook*

In Georgia, LEAs must complete an annual consolidated application known as the Consolidated LEA Improvement Plan (CLIP). The CLIP is comprised of 2 parts. Parts pertinent to Title II, Part A are denoted in blue below:

- **Part I - Planning**
  - District Identification of Needs (including equity needs) and Improvement Planning
  - Intent to transfer Title II, Part A Funds (whole or part)
  - Intent to Consolidate Title II, Part A Funds (whole or part)
  - Intent to exercise Title II, Part A Flexibility – Ed-Flex
  - Parent and Family Engagement Policy
  - Foster Care Transportation Plan
  - Title I, Part A ID&R Plan
- **Part II - Budgeting**
  - General & Title II, Part A Assurances, Prayer Certification, GEPA
  - Program Budgets & Title II, Part A Program Specific Attachments
    - If applicable - CSR worksheet, schedules, verification of class size
    - If applicable - LEAs Prioritizing Funds to the School Level (TSI and CSI only)
    - If applicable - Job Descriptions

Specific information about Federal Programs CLIP submission requirements is further explained in the [Federal Programs Handbook – Information Applicable to All Federal Programs](#).

## **3.2 CLIP: Assurances**

*ESSA Sec. 2102(b)(2)(E-F); ESSA Section 8306; Federal Programs Handbook*

Sec. 8306 of the Elementary and Secondary Education Act of 1965 (ESEA) as amended by the Every Student Success Act of 2015 (ESSA) requires that LEAs shall have on file with the State educational agency a single set of assurances, applicable to each program for which a plan or application is submitted. Each LEA will acknowledge general assurances addressing all federal programs **and** specific Title II, Part A assurances where an allocation is received. This acknowledgement occurs on the MyGaDOE Portal annually. The Superintendent's sign-off on the consolidated application denotes agreement to each assurance.

### General Assurances

As a condition of receiving the federal funds for which application is made in this Consolidated Application, the applicant's local board of education (Applicant) assures the following:

1. each such program will be administered in accordance with all applicable statutes, regulations, program plans, and applications;
2. the control of funds provided under each such program and title to property acquired with program funds will be in a public agency or in an eligible private agency, institution, organization, or Indian tribe, if the law authorizing the program provides for assistance to those entities; and
3. the public agency, eligible private agency, institution, or organization, or the Indian tribe will administer the funds and property to the extent required by the authorizing statutes;
4. the applicant will adopt and use proper methods of administering each such program, including—
  - a. the enforcement of any obligations imposed by law on agencies, institutions, organizations, and other recipients responsible for carrying out each program; and
  - b. the correction of deficiencies in program operations that are identified through audits, monitoring, or evaluation;
  - c. ensuring interventions purchased with federal funds are evidence based.
5. the applicant will cooperate in carrying out any evaluation of each such program conducted by or for the State educational agency, the Secretary, or other Federal officials;

6. the applicant will use such fiscal control and fund accounting procedures as will ensure proper disbursement of, and accounting for, Federal funds paid to the applicant under each such program; and
7. the applicant will—
  - a. submit such reports to the State educational agency (which shall make the reports available to the Governor) and the Secretary as the State educational agency and Secretary may require to enable the State educational agency and the Secretary to perform their duties under each such program; and
  - b. maintain such records, provide such information, and afford such access to the records as the State educational agency (after consultation with the Governor) or the Secretary may reasonably require to carry out the State educational agency’s or the Secretary’s duties; and
  - c. before the application was submitted, the applicant afforded a reasonable opportunity for public comment on the application and considered such comment.

#### Title II, Part A Assurances

- (E) The local educational agency will comply with section 8501 (regarding participation by private school children and teachers)
- (F) The local educational agency will coordinate professional development activities authorized under Title II, Part A with professional development activities provided through other Federal, State, and local programs

### **3.3 CLIP: Ed-FLEX** *ESSA Sec. 9207*

The Educational Flexibility (Ed-Flex) program is authorized under the Education Flexibility Partnership Act of 1999 and was reauthorized by section 9207 of the Every Student Succeeds Act (ESSA). The Ed-Flex program allows the Secretary to authorize a State educational agency that serves an eligible State to waive statutory or regulatory requirements applicable to one or more of the included programs for any local educational agency (LEAs), educational service agency, or school within the State.

ED granted this authority to the Georgia Department of Education on May 18, 2020. This authority will remain in place through the 2023-2024 school year.

The Ed-Flex Review Criteria:

- Ensure request is not on the unallowable list
- Ensure request does not undermine intent of the Title II, Part A statute
- Connection to the CLIP
- Expected outcomes, school/student performance

Specific LEA directions for applying for Title II, Part A flexibility through ED may be found on the Federal Programs webpage.

### **3.4 CLIP: Title II, Part A Meaningful Consultation and Ongoing Stakeholder Engagement** *ESSA Sec. 2102(b)(3)*

ESSA section 2102(b)(3) states: A local educational agency **shall**—


(A) meaningfully consult with teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders (in a local educational agency that has charter schools), parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of this title;

(B) seek advice from the individuals and organizations described in subparagraph (A) regarding how best to improve the local educational agency’s activities to meet the purpose of this title.

ESSA encourages meaningful consultation and ongoing stakeholder engagement that helps ensure that diverse stakeholders play a more active role in the comprehensive needs-assessment process. Meaningful



stakeholder engagement starts at the beginning of the process, when initial planning is getting started; not at the end, when a plan is nearing completion. The goal of meaningful engagement should be for stakeholders to leave feeling heard, informed and aware of how they can stay involved.

<b>Getting Started with Meaningful Consultation</b>	
<ul style="list-style-type: none"> <li>○ Do stakeholders know why they are being engaged?</li> <li>○ Have stakeholders been asked how they wish to be involved?</li> <li>○ Will the stakeholders be able to provide substantive input?</li> <li>○ How can the LEA ensure stakeholders come prepared?</li> <li>○ Has the LEA ensured required Title II, Part A stakeholders are involved?</li> <li>○ How will the LEA ensure diversity of stakeholder groups?</li> <li>○ Will there be opportunities for different perspectives and solutions?</li> </ul>	

Title II, Part A Required Stakeholders for Consultation	Best Practices/Suggestions
<b>Teachers</b>	ES, MS, HS, Alternative, Charter, Various Content/Service Areas, Teacher Leaders, Different Career Stages, Special Education/ESOL/Gifted/STEM/STEAM Support, Instructional Coaches
<b>Principals (Including Assistant Principals)</b>	ES, MS, HS, Alternative, Charter, Different Career Stages
<b>Paraprofessionals</b>	ES, MS, HS, Regular & Special Education
<b>Parents</b>	ES, MS, HS, Alternative, Charter, Parents w Students Receiving Special Services (Parents who are not LEA Employees)
<b>Community Partners</b>	Business Partners, Community Agencies, Civic Organizations, Religious Organizations, Law Enforcement, YMCA
<b>Charter School Leaders (If in LEA)</b>	Principals, Executive Directors, etc.
<b>Other school leaders (daily operations &amp; instruction)</b>	Executive Directors, Private School Leaders
<b>Specialized Instructional Support Personnel</b>	Teachers on Assignment, Media Specialist, Instructional Technology Support Personnel, Counselors, clerical/custodial/nutritional staff, school resource officers
<b>Other relevant organizations or partners</b>	RESA, Early Learning, Before and After School Care, Institutions of Higher Ed., P-20, Retired Teachers Organization, Professional Educational Organizations

Stakeholder engagement does not end when LEAs move from the initial in-put phase into the planning stage of the comprehensive needs-assessment process. Continuous feedback is essential to creating buy-in from stakeholders. As LEAs hold public meetings, draft policies, and ultimately make decision about how they will support the LEA towards continuous improvement, it is beneficial to provide updates to stakeholders.

Stakeholder Engagement Methods	Stakeholder Engagement Considerations
On-site or Virtual Meetings/Forums	Customize engagement methods to audience
Interviews, Conferences, and Roundtable Discussions	Ensure methods of engagement are accessible (translators, interpreters, physically accommodating)
Newsletters, Blogs, Emails and Text Messages	Vary dates (week and weekend) and time
Surveys and Focus Groups	Consider providing childcare for multiple children
Websites, Social Media	Schedule locations
Conference Calls and Online Chat	Publish online and in print
Webinars, Livestreaming	Ensure materials are accessible, succinct, engaging, and avoid educational jargon

### 3.5 CLIP: Consultation Resources through Accrediting Agencies

ESSA Section 2102 and 2103; 2 CFR § 200.405

LEAs who contract with accrediting agencies are provided the opportunity to have access to tools or resources that may assist the LEA in the continuous school improvement process. However, Title II, Part A funds may only be used to fund a portion of the associated costs for accreditation to specifically include continuous school improvement as it relates to required stakeholder consultation to establish LEA needs related to Title II, Part A Local Uses of Funds. In compliance with the *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards* § 200.405 a cost may be charged to the grant ‘in accordance with relative benefits received... and can be distributed in proportions that may be approximated using reasonable methods.’ This determination is at the LEA’s discretion but is subject to review during program audits and/or monitoring.

Before incurring any costs related to accreditation, LEAs are encouraged to determine if the cost could be considered supplanting. The ED Cross-Cutting Section of the Audit Compliance Supplement states the following:

*‘An SEA and LEA may use program funds only to supplement and, to the extent practical, increase the level of funds that would, in the absence of the Federal funds, be made available from non-federal sources for the education of participating students. In no case may an LEA use Federal program funds to supplant funds from non-federal sources.’* It is presumed that supplanting has occurred if:

- ‘a. The SEA or LEA used Federal funds to provide services that the SEA or LEA was required to make available under other Federal, State or local laws.*
- b. The SEA or LEA used Federal funds to provide services that the SEA or LEA provided with non-federal funds in the prior year.’*

Please be reminded that this Title II, Part A guidance is specific to Title II, Part A implementation in Georgia and may not apply to other ESSA programs implemented in Georgia. Contact your assigned Title II, Part A specialist with specific questions.

### 3.6 Budget Planning: Title II, Part A Program Administrative Costs

2 CFR §200.403

ESEA grants the SEA authority to set reasonable and necessary thresholds on administrative costs paid within each grant in order to facilitate the utilization of grant funds for the true intent and purpose of the grant – improving student achievement. 2 CFR, Part 200.403 states that charges to federal grants must be reasonable, necessary, and allocable. ESSA does not set an administrative cost threshold for Title II, Part A.

In Georgia, Title II, Part A program administrative costs should be budgeted in Function Code 2230. Title II, Part A directs LEAs to ensure that administrative costs are reasonable and necessary for effective program implementation. Title II, Part A program administrative costs exceeding 10% should be discussed with Title II, Part A program specialists and a justification may be requested to document how the amount is reasonable and necessary and how it impacts the provision of equitable services. Title II, Part A program administrative costs **MUST** be discussed during consultation for the provision of equitable services.

### 3.7 Budget Flexibility: Consolidation of Administrative Funds

ESEA Section 1114, Sections 8201 and 8203; Federal Programs Handbook

LEAs may elect to consolidate administrative funds from the **federal** grants received and may use those funds for allowable uses for the administration of the programs consolidated. Administrative expenditures are limited to those which are necessary and reasonable for the proper and efficient administration of the program and may provide LEAs with additional flexibility that enables the efficient administration of multiple programs simultaneously.

An LEA must have the approval of the GaDOE to consolidate administrative funds each school year.

- The LEA must notify the GaDOE of its intent to consolidate administrative funds by August 1.
- The LEA must complete the Consolidation of ESSA Administrative Funds – LEA Level Form annually.
- The completed form must be attached in the Attachments tab in the Consolidated Application each fiscal year.

For Title II, Part A budget submissions, if an LEA consolidates administrative funds in 2230-882, then no additional administrative costs may be budgeted in Function Code 2230.

If the LEA chooses to apply indirect costs, then it must be budgeted in Function Code 2300 outside of consolidation of administrative funds.

Additional guidance on Consolidation of Administrative funds is further explained in the [Federal Programs Handbook – Information Applicable to All Federal Programs](#).

### 3.8 Budget Planning: General Administrative Costs

2 CFR §200.414; Federal Programs Handbook; Consolidation of Funds Manual

General administrative costs include audit and indirect costs and should be budgeted in Function Code 2300.

#### Indirect Costs – (2300-880)

The GaDOE calculates restricted indirect-cost rates for LEAs each fiscal year based on requirements established by ED. Restricted indirect-cost rates are posted on GaDOE’s Website and are sent to LEAs.

LEAs may only apply the indirect costs rates on expenditures which are determined on an LEA by LEA basis. Direct costs cannot also be charged as indirect costs. For example: salary and benefits for clerical support that are budgeted as a direct cost cannot also be charged as an indirect cost. The same would apply to budgeting administrative supplies, etc.

Indirect costs can be budgeted on the whole grant but should only be drawn down after appropriately applied. Completion reports should show indirect costs applied appropriately. If completed correctly in one year, the indirect costs can then apply to carryover in the following year.

The Title II, Part A program makes available to LEAs annually the Title II, Part A Indirect Cost Calculations based on each LEA’s approved Title II, Part A allocation. These calculations are located on the Title II, Part A webpage.

For more information on Indirect Costs, visit the following link: <http://www.doe.k12.ga.us/Finance-and-Business-Operations/Financial-Review/Pages/default.aspx>.

### 3.9 Budget Flexibility: Coordination of Services

34 CFR § 76.760

The Code of Federal Regulations (34 CFR §76.760) states that more than one program may assist a single activity:

An LEA may use funds under more than one program to support different parts of the same project if it meets the following conditions:

- a. The LEA complies with the requirements of each program with respect to the part of the project assisted with funds under that program.
- b. The LEA has an accounting system that permits identification of the costs paid for under each program.

34 CFR §76.760 allows LEAs to maximize the impact of their federal funds allowing LEAs to leverage federal programs to support selected interventions/strategies. Because many of the central objectives of each individual

ESSA program are shared with other Federal and state programs, coordination or “braiding” works best when LEAs identify student and staff needs and plan a supportive budget in advance of expenditures. When coordinating/braiding, the LEA should consider the allowability of expenditures and ensure that it is using the funds in a way that is supplementing rather than supplanting. It is not uncommon for LEAs to coordinate/prorate the cost of software, salaries, equipment, contracted services, and professional development. This is especially helpful when an expenditure extends beyond what is allowable under a single program.

### 3.10 Budget Flexibility: Schoolwide Consolidation of Funds – Fund 150

*ESEA Section 1114, Section 8203; GaDOE Federal Programs Consolidation of Funds Manual; Federal Programs Handbook*

#### GaDOE Schoolwide Consolidation – Fund 150

GaDOE currently has several cohorts of LEAs participating in the schoolwide consolidation of funds initiative to fully consolidate federal, state, and local funds in Title I schools. These cohorts work closely with the Federal Programs Senior Manager, Federal Programs and GaDOE Finance as they consolidate **local, state, and eligible federal** funds. The Consolidation of Funds webpage contains the necessary resources to successfully assist LEAs who wish to become a part of this initiative.

Many LEAs participating in schoolwide consolidation find that transferring Title II, Part A into other federal programs provides additional flexibility for addressing LEA needs and simplifies the consolidation administrative process.

### 3.11 Budget Flexibility: Transferability

*ESSA Sec. 5102-5103; Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements Under the ESEA of 1965 as amended by ESSA (2016); 34 CFR § 76.760; Federal Programs Handbook*

#### ESEA Transferability (ESSA Sec. 5103(b))

ESEA allows LEAs the flexibility to transfer Title II, Part A funding they receive by formula to other Federal programs so they can address more effectively their unique needs. The LEA may transfer all or any lesser amount of their Title II, Part A or Title IV, Part A allocations into eligible grants. LEAs, usually LEAs with modest allocations, sometimes transfer out of Title II, Part A or into Title II, Part A to cover entire costs of selected interventions/activities such as CSR teachers, instructional coaches and large-scale contractual curriculum interventions that include materials, software and professional development. This can also help LEAs streamline allowability documentation such as time and effort.

Transfer all or any portion of funds (ESEA Section 5103(b))	
From	To
Title II, Part A Title IV, Part A	Title I, Part A – Improving Basic Programs Operated by LEAs
	Title I, Part C – Education of Migratory Children
	Title I, Part D – Neglected, Delinquent, or At-Risk
	Title II, Part A – Supporting Effective Instruction
	Title III, Part A – English Language Acquisition, Language Enhancement, and Academic Achievement
	Title IV, Part A – Student Support and Academic Enrichment
	Title V, Part B – Rural Education

#### Drawdown of Transferred Funds

Since the transferred amount is not brought into the Grants Accounting Online Report System (GAORS), the amount transferred to another program will have to be drawn down from the originating program. LEAs must draw down from the originating program first. The LEA will track the drawdowns at the local level.

#### Completion Report and Transferred Funds

The originating program will submit a completion report that indicates the funds were transferred. The originating program completion report should mirror the approved budget.

Additional guidelines on Transferability are in the [Federal Programs Handbook – Information Applicable to All Federal Programs](#).

### 3.12 Budget Flexibility: Transferability and Equitable Services

*Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA) November 21, 2016*

#### **What are the responsibilities of an SEA or LEA for the provision of equitable services to private school children and teachers with respect to funds being transferred?**

Excluding Title I, Part D and Title V, Part B, each program covered by the transferability authority is subject to the equitable services requirements under Title I or VIII, which may not be waived. (ESEA section 8401(c)(5).) Before an SEA or LEA may transfer funds from a program subject to equitable services requirements, it must engage in timely and meaningful consultation with appropriate private school officials. (ESEA section 5103(e)(2).) With respect to the transferred funds, the SEA or LEA must provide private school students and teachers equitable services under the program(s) to which, and from which, the funds are transferred, based on the total amount of funds available to each program after the transfer.

**May an SEA or LEA transfer only those funds that are to be used for equitable services to private school students or teachers?** No. An SEA or LEA may not transfer funds to a particular program solely to provide equitable services for private school students or teachers. Rather, an SEA or LEA, after consulting with appropriate private school officials, must provide equitable services to private school students and teachers based on the rules of each program and the total amount of funds available to each program after a transfer. (See ESEA section 5103(e).)

**In other words, can LEAs leave just the nonpublic share in its original program while transferring out all other LEA funds?** LEAs must calculate equitable service shares based on the total amount of funds available under a program after a transfer. Just as an LEA may not transfer funds to a particular program solely to provide equitable services, it may not retain funds solely for this purpose. Section 5103(e)(1) of the ESEA, as amended by ESSA, is clear that funds transferred under this section are subject to each of the rules and requirements applicable to the funds under the provision to which the transferred funds are transferred. Thus, if an LEA chooses to transfer 100% of its Title IV, Part A funds to Title I, it may not provide equitable services under Title IV, Part A. Please keep in mind that an LEA must consult with private school officials prior to any transfer; however, the final decision about whether to transfer funds remains with the LEA.

### 3.13 Budget Entry: GaDOE LUA Chart of Accounts

*O.C.G.A. 20-2-167 (b) (1), SBOE Rule 160-5-2-.23; Federal Programs Handbook Chapter 4*

Local Units of Administration (LUAs) are required by Georgia law [O.C.G.A. 20-2-167 (b) (1)] to comply with uniform regulations established by the State Board of Education relative to the statewide uniform computerized budget and accounting system. Rule 160-5-2-.23, of the Georgia Board of Education incorporates the LUA Manual by reference. Additionally, this manual provides guidance to LUA fiscal personnel and serves as a useful training and reference source for LUA employees. As a rule, parameters for use of function and object code combinations are determined by the objectives and allowable activities of a program. To ensure the most up-to-date Function and Object Relationships see GaDOE's LUA Chart of Accounts. The annually updated LUA Chart of Accounts and corresponding guidance are located on the GaDOE Website <http://www.gadoe.org/Finance-and-Business-Operations/Financial-Review/Pages/default.aspx>

When reading a detailed expenditure report (annual, quarterly, or monthly), coordinators can identify the fund source and intended expense by looking at the coding.

EXAMPLE: 414-1784 -2213 -116

- 414 (FUND: Government Funds),
- 1784 (PROGRAM: Title II, Part A),
- 2213 (FUNCTION: Instructional Staff Training),
- 116 (OBJECT: Stipends)

Title II, Part A focuses on recruitment, retention, and professional development. The function codes most often associated with these activities are 2213 (PD), 2230 (grant administration), 2800 (district office recruitment activities) and object codes like 580 (travel costs associated with PD) and 810 (registration costs associated with PD). For additional guidance, reference the Title II, Part A specific [Function and Object Code Quick Guide](#) located in the appendix of this document.

### 3.14 Budget Considerations and Reminders: Carryover

During the grant cycle, budget amendments may be necessary for carryover funds. The following chart lists considerations and reminders to think about when submitting a budget amendment for carryover.

Title II, Part A Budget Considerations for Carryover Funds
<ul style="list-style-type: none"> <li>Did you transfer or consolidate Title II, Part A funds with your original budget? If so, do you plan to transfer or consolidate carryover funds?</li> </ul>
<ul style="list-style-type: none"> <li>Determine how carryover funds will be budgeted for the LEA.</li> </ul>
<ul style="list-style-type: none"> <li>Have extenuating circumstances impacted your private schools and their ability to spend Title II, Part A funds? If so, you may want to consider requesting approval from Ombudsman for private school carryover funds.</li> </ul>
<ul style="list-style-type: none"> <li>If adding new line items to the budget, are the items aligned to the action steps funded by Title II, Part A in your approved CLIP?</li> </ul>
<ul style="list-style-type: none"> <li>Determine if new line items are an allowable use of Title II, Part A funds. Helpful resources for determining allowability located in the Title II, Part A Handbook include: Authorized Use of Funds A-P and Essential Questions for Determining Allowability.</li> </ul>
<ul style="list-style-type: none"> <li>Develop a plan for measuring effectiveness of implementation and impact of additionally funded action steps.</li> </ul>
<ul style="list-style-type: none"> <li>When entering budget descriptions in the Consolidated Application, did you include the CLIP alignment and the evidence-base description?</li> </ul>
<ul style="list-style-type: none"> <li>Review the CSI and TSI schools lists on the Accountability page of the Georgia Department of Education website. If the LEA has newly identified CSI or TSI schools, the Budget Attachment: School Level Prioritization of Funds must be uploaded under the General Attachments tab to indicate the (1) prioritization of funds to these schools, or (2) a justification stating why Title II, Part A funds do not need to be prioritized to the schools. If the attachment was previously uploaded for prior identified schools, the attachment must be updated to include the newly identified CSI and/or TSI school(s).</li> </ul>

### 3.15 Budget Considerations and Reminders: Reallocation of Funds

During the grant cycle, budget amendments may be necessary for reallocation of funds. The following chart lists considerations and reminders to think about when submitting a budget amendment for reallocation of funds.

Title II, Part A Budget Considerations for Reallocation of Funds
<ul style="list-style-type: none"> <li>Did your Title II, Part A grant award increase or decrease? If your award decreased in amount, do you need to reclassify Title II, Part A expenses that are over the amount of the grant?</li> </ul>
<ul style="list-style-type: none"> <li>Did you transfer or consolidate Title II, Part A funds with your original budget? If so, do you plan to transfer or consolidate your reallocation funds?</li> </ul>
<ul style="list-style-type: none"> <li>Do you have participating private schools in your LEA? If so, you will need to refer to the Title II, Part A Equitable Services documentation.</li> </ul>
<ul style="list-style-type: none"> <li>If adding new line items to the budget, are the items aligned to the action steps funded by Title II, Part A in your approved CLIP?</li> </ul>
<ul style="list-style-type: none"> <li>Determine if new line items are an allowable use of Title II, Part A funds. Helpful resources for determining allowability located in the Title II, Part A Handbook include: Authorized Use of Funds A-P and Essential Questions for Determining Allowability.</li> </ul>
<ul style="list-style-type: none"> <li>Develop a plan for measuring effectiveness of implementation and impact of additionally funded action steps.</li> </ul>

- When entering the budget descriptions in the Consolidated Application, did you include the CLIP alignment and the evidence-base description?

# FINANCIAL AND PROGRAM MANAGEMENT

## 4.1 Internal Controls

2 CFR §§ 200.1, 200.303; OCGA; SBOE Rule; Federal Programs Handbook



*Internal controls* can be defined as a process, implemented by a LEA designed to provide reasonable assurance regarding the achievement of objectives in the following categories: effectiveness and efficiency in operations, reliability of reporting for internal and external use, and compliance with applicable laws and regulations (2 CFR §200.1). The goal of internal controls is to reduce fraud, waste, and abuse in the use of Federal funds. Internal Controls are the first line of defense in safeguarding public resources. LEAs must adequately safeguard all assets and assure that they are used solely for authorized purposes.

Internal Controls (Written Policies/Procedures) should be clearly written and clearly communicated. Policies and procedures governing the LEA's implementation of federal grants should be reviewed routinely and revised as needed. An LEA may determine if the LEA's internal controls are policies (formal) OR procedures (informal) or a combination of the two. The LEA's internal controls help ensure the LEA (1) runs its operations efficiently and effectively, (2) reports reliable information about its operations, and (3) complies with applicable laws and regulations.

LEAs MUST establish and maintain effective fiscal control and fund accounting procedures (internal controls) over the Federal award that provide reasonable assurance that the LEA

- manages the Federal award in compliance with federal statute, regulations, and terms of the award,
- evaluates and monitors its compliance with federal statute, regulations, and terms of the award,
- takes prompt action when instances of noncompliance are identified including noncompliance identified in audit findings, and
- takes reasonable measures to safeguard protected personally identifiable (PII) information.

The Uniform Administrative Requirements lists several internal controls required in writing. Requirements are further explained in the [Federal Programs Handbook – Overarching Requirements for All Federal Programs](#). Other topics should also be considered when developing internal controls as a best practice.

While not every process is required to be written into an internal control, many should be written as a best practice. LEAs who are issued findings during monitoring must write internal controls as a part of corrective action. The most common findings related to internal controls are

- lack of internal controls
- internal controls that are incomplete or have not been updated for current guidance
- internal controls that are disorganized and not systemically implemented (conflicting copies), and
- internal controls that are program specific and do not address Title II, Part A



The graphic below reflects required Internal Controls reviewed during Cross-Functional Monitoring.



### 4.3 Drawdown of Funds & Completion Reports

2 CFR §200.303, §200.302(b)(4); §200.305(b); GaDOE Position Paper; SBOE 160-5-2-.21; O.C.G.A. §§20-2-164; 20-2-167; 20-2-167.1; 20-2-272; Federal Programs Handbook

#### Timely and Accurate Drawdown of Funds

- In Georgia, ESSA is administered through a reimbursement payment process. This means that after preparing a budget and having it approved, LEAs must obligate funds prior to the drawdown of funds. Drawing down funds prior to obligation constitutes a cash advance process which is subject to different laws.
- Federal law is clear that the purpose of ESSA funds is to identify needs, plan interventions and implement resulting plans in order to have the greatest impact possible on students and staff in the most immediate time frame available. LEAs must follow federal regulations and state guidance regarding the drawdown of funds. In the absence of federal regulations that explicitly identify an exact timeframe for LEA drawdowns, GaDOE has established general guidance encouraging LEAs to drawdown funds throughout the grant year, noting that LEAs should only drawdown in accordance with their approved budget(s) and actual expenditures. In alignment with 2 CFR 200.302(b)(4) requiring subrecipients to maintain effective control and accountability for all funds, assuring that they are used solely for authorized purposes, it is the expectation of the GaDOE that funds that are expensed are drawdown in a timely manner and adhere to compliant LEA drawdown procedures. A delay in accessing funds will be considered when determining whether LEAs maintain effective fiscal control.
- In an effort to assist LEAs in complying with timely drawdown of funds, the GaDOE will periodically review the drawdown of funds documented on the GaDOE Grants Accounting Online Reporting System (GAORS).
- To minimize the time elapsing between drawdown and disbursement and ensure accurate accounting records the LEA should have written internal controls.
- GaDOE has published a position paper on the topic of Drawdowns. This can be accessed through the Title II, Part A guidance webpage. <https://www.gadoe.org/School-Improvement/Teacher-and-Leader-Effectiveness/Pages/IIA-Guidance.aspx>
- Many programs vary in their expectation of drawdown levels. Title II, Part A asks LEAs to adhere to their cash management internal controls for drawdowns. For specific drawdown levels reference Federal program's handbook. <https://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Federal-Programs-Handbook.aspx>
- LEAs transferring funds from Title II, Part A to another program should draw down Title II, Part A funds prior to drawing down funds in the transferred program. LEAs transferring funds to Title II, Part A from another program should draw down funds from the transferring program prior to drawing down Title II, Part A funds. This will help to ensure accurate record keeping especially related to completion reports and the calculation of carryover.

#### Drawdown - Source Documentation

LEAs should provide evidence that the LEA's requests for draw down of federal funds are reconciled with the actual Title II, Part A expenditures. Drawdowns of federal funds are only for immediate needs.

Supporting documentation must include accurate financial records to reflect complete alignment of actual Title II, Part A expenditures with drawdown amounts. The financial records must align to the approved Title II, Part A budget (Function Codes and Object Codes). Financial records for each drawdown (DE0147) must include the Title II, Part A monthly detailed expenditure report, Title II, Part A monthly payroll history report (if Title II, Part A funds salaries, stipends, additional compensation, financial incentives), and could include the general ledger that aligns with each drawdown (DE0147).

*It is the recommendation of the GaDOE that the Federal program administrator **reviews and approves** all drawdown requests **prior** to the finance officer submitting the request in GAORS. This is necessary to ensure that funds are spent in accordance with the budget as approved by GaDOE program manager.*

### Drawdowns - Transfers

Source documentation for transfer drawdowns (DE0147s) must include the receiving programs monthly detailed expenditure reports and could include the general ledger that aligns with each transfer drawdown (DE0147). The financial documents will provide evidence that the amount of transferred Title II, Part A funds align with the receiving program's actual expenditure amounts and are drawn down prior to the funds being drawn down from the receiving program.

### Completion Reports

The GaDOE requires each local educational agency (LEA) receiving grant funds to submit a Completion Report no later than 30 days after the initial 15-month period of availability ends. Therefore, Title II, Part A completion reports are due October 30. Completion Reports may be accessed on-line through Grants Accounting Online Reporting System (GAORS).

A Completion Report reflects the total amount of the original grant award including any previous year carryover funds and the total amount of funds that were expended by an LEA during the current grant period. Grants Accounting uses completion reports to determine the amount of unexpended funds and the amount of funds available for carryover for each LEA.

LEA Federal Programs staff should work with their finance department to ensure that completion reports are submitted in a timely manner and in accordance with the LEA's internal controls. GaDOE reserves the right to release new grant funding to each LEA after the LEA's Completion Report has been submitted. Requirements are further explained in the [\*Federal Programs Handbook – Information Applicable to All Federal Programs\*](#).

### Completion Reports – Source Documentation

Prior year Title II, Part A Completion Reports are reviewed to ensure accurate alignment between the approved Title II, Part A budget with the actual Title II, Part A expenditures. The amount of Title II, Part A drawdowns are aligned with the expenditure totals for the completion report.

Supporting documentation includes the prior year's general ledger, Title II, Part A expenditure report and the total DE0147 amount for the financial year.

## **4.4 Segregation of Duties & Authorization of Expenditures**

**2 CFR §§200.303(a), 200.302(b)(4); GAO-14-704G Standards for Internal Control in the Federal Government (2014 p. 45) - 10.03; ESEA/ESSA Sec. 8306(1),(3); Federal Programs Handbook**

### Segregation of Duties

LEAs should follow generally accepted accounting principles. Written internal controls should outline how LEA management divides or segregates key duties and responsibilities among different people to reduce the risk of error, misuse, or fraud. This includes separating the responsibilities for authorizing transactions, processing and recording transactions, reviewing the transactions, and handling any related assets so that no one individual controls all key aspects of a transaction or activity.

### Authorization of Expenditures

In Georgia, prior to charging Title II, Part A, all expenditures being charged to the grant must receive written approval by the LEA designated grant coordinator who should have current (annual) firsthand knowledge of the grant expectations. All expenditures charged to the grant should be reviewed for adherence to Federal and State laws, regulations and guidance.

**NEW! Budget period means the time interval from the start date of a funded portion of an award to the end date of that funded portion during which recipients are authorized to expend the funds awarded, including any funds carried forward or other revisions pursuant to 200.308**

## **4.5 Period of Performance: Expenditures**

**34 CFR §76.707; 2 CFR §200.1, 200.309, 200.403(h); Federal Programs Handbook**

Period of performance means the time during which the non-federal entity (LEA) may incur new obligations to carry out the work authorized under the Federal award (Title II, Part A). For Title II, Part A the period of performance is July 1 of the current fiscal year through September 30 of the following year (15 months), plus an additional 12 months of carryover. A non-federal entity (LEA) may charge to the Federal award (Title II, Part A) only allowable costs incurred during the period of performance. LEAs are encouraged to expend funds early in the grant cycle to maximize the impact of funds during the period of performance.

#### Contracts and Period of Performance (2 CFR §200.318(b))

While contracts funded by Title II, Part A that are obligated during the 27-month period of performance may have services that extend beyond the period of performance; in Georgia, payments (in part or in whole) for contracts should not be made prior to the completion of corresponding services. It is recommended that LEAs develop contracts in such a way that they adhere to the period of performance. In addition, it is recommended that any multi-year agreement incorporate a contingency clause that addresses continuation assuming availability of funds and continued allowability. For additional guidance, refer to the [Federal Programs Handbook](#).

#### Licensing and Renewal and Period of Performance (34 CFR §76.707)

It is recommended that A) LEAs set up initial licensing in accordance with the beginning of the grant period of performance or B) LEAs temporarily prorate licensing until the beginning of the grant period of performance and then license for a year or multiple years, if entering into a multiyear agreement yields a cost advantage. In addition, it is recommended that any multi-year agreement incorporate a contingency clause that addresses continuation assuming availability of funds and continued allowability. For additional guidance, refer to the [Federal Programs Handbook - Information Applicable to All Federal Programs](#).

### 4.6 Inventory Management

2 CFR §200.313(d)

LEAs must have written internal controls for Inventory Management governing the LEA's (1) acquisition, (2) use, (3) inventory, (4) maintenance, (5) disposition of equipment, and (6) how purchased equipment will be safeguarded to prevent loss, damage or theft.

### 4.7 Time and Effort

2 CFR §200.430(i); [Federal Programs Handbook](#)

Any LEA not participating in consolidation of funds should document time and effort in compliance with 200.430(i), the LEA's internal controls, the annually published Audit Compliance Supplement and [Federal Programs Handbook - Information Applicable to All Federal Programs](#). To the extent that Title II, Part A is used in compliance with the LEA Authorized Use of Funds for **salaries, stipends, or substitutes** the following chart applies:

2 CFR §200.430(i)(1)(i, vii) The LEA **must have written internal controls** that provide reasonable assurance that charges to the grant for wages are accurate (reflect the work performed), allowable, and properly allocated.

*Note: Essential to internal controls for time and effort is the completion of time and attendance reporting; required approval cycle; processing of personnel charges to the federal awards; and internal review process to ensure effective control over the award.*

2 CFR §200.430(i)(1)(viii)(B,C) In the written **time and effort internal controls**, the LEA **must** ensure for the regular monitoring of (1) budgeted time and effort expenditures, (2) actual charges to the federal award and (3) time and effort records to ensure accuracy and the reconciliation of discrepancies.

*Note: The information should be of sufficient detail to permit an understanding of how the system will operate from the point the time is worked to the point the time is recorded in the accounting records and charged to federal awards.*

Time and Effort flexibility is explained in the [Federal Programs Handbook – Information Applicable to All Federal Programs](#). For additional guidance, refer to the [Title II, Part A Time and Effort Quick Guide](#) located in the appendix of this document.

### 4.8 Procurement Levels & Suspension and Debarment

LEAs **must have written procurement internal controls** that, at a minimum, must meet Federal requirements. Written internal controls include conflict of interest, contract oversight, competition, and procurement (including evaluation and selection criteria). During monitoring, Title II, Part A should be able to determine that expenditures follow local procurement procedures, including documentation required for purchasing at designated thresholds.

Procurement Methods		Best Practice	
<b>Informal Procurement Methods</b>			
Micro-purchase* (2 CFR §§200.1, 200.320, 48 CFR Subpart 2.1)	Up to \$10,000	To the extent practicable, LEAs must distribute micro-purchases equitably among qualified suppliers (220.320(a))	<ul style="list-style-type: none"> <li>• If a micro-purchase is questioned, a review of websites would be sufficient to establish the cost as reasonable. (ED FAQs on 2 CFR Part 200, Subpart D question 19, March 17, 2016)</li> <li>• As it relates to 'aggregate', in Georgia, Title II, Part a will verify that single purchases that exceed \$10,000, whether solely funded by Title II, Part A or split across multiple programs, are supported by multiple price rate quotations or a single source justification that meets federal requirements (200.320(f))</li> </ul>
Small Purchase (2 CFR §200.320)	\$10,001 to \$250,000	Must perform a cost or price analysis by obtaining 2 or more price rate quotations from qualified sources	<ul style="list-style-type: none"> <li>• It is best practice to obtain at least 3 quotes to demonstrate due diligence</li> </ul>
<b>Formal Procurement Methods</b>			
Simplified Acquisition Threshold* (2 CFR §200.1, 48 CFR Subpart 2.1)	\$250,000+	<ul style="list-style-type: none"> <li>• Procurement by Sealed Bid or Procurement by Competitive Proposal</li> <li>• Must have a written method for conducting technical evaluations of the proposals received and for selecting recipients</li> </ul>	ED FAQs on 2 CFR Part 200, Subpart D question 10, March 17, 2016 states that listing vendors when writing RFPs limits competition.
<b>Noncompetitive Procurement</b>			
<p>There are specific circumstances in which noncompetitive procurement (sole sourcing) can be used. Noncompetitive procurement can only be awarded if one or more of the following circumstances apply:</p> <ul style="list-style-type: none"> <li>○ The acquisition of property or services, the aggregate dollar amount does not exceed the micro-purchase threshold;</li> <li>○ The item is only available from a single source;</li> <li>○ There is an emergency for the requirement that will not permit a delay resulting from competitive solicitation;</li> <li>○ ED and/or GaDOE authorizes noncompetitive proposal in response to a written request from the LEA; or</li> <li>○ After solicitation of multiple sources, competition is determined inadequate.</li> </ul>			
<b>Suspension and Debarment</b>			
Provide documentation that the LEA verified that the vendor is not suspended or debarred or otherwise excluded from participation in federal programs/ activities once the cumulative amount of federal funds expended by the district exceeds a set amount. (2 CFR §200.213)	\$25,000	LEAs should print a copy of the date-stamped verification report from <a href="http://www.sam.gov">www.sam.gov</a> to keep with expenditure records.	

#### 4.9 Source Documentation

ESSA Section 8306; 20 USC §1232(f); 2 CFR §§200.302(b)(3), 200.334, 200.403(g), 200.501(d) 200.508(d); 34 CFR§76.730-731; 34 CFR §81.31(c); Federal Programs Handbook Chapters

LEAs are required to keep source documentation on file for each Title II, Part A expenditure. Documentation must be made available during audits and program monitoring. Documentation will vary from LEA to LEA and expenditure to expenditure. However, all documentation should be sufficient to determine that expenditures are

allowable and used according to Federal, state and local statutes, regulations, policies, guidance and procedures, and terms and conditions of the Federal Award and are reasonable and necessary, supplemental to non-federal funds, and align with the ESSA budget. These records must contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income, and interest and be supported by source documentation. Common source documentation may include: purchase orders, detailed invoices, travel expense statements, meeting agendas, contracts for services, sign-in sheets, leave forms, PowerPoints, etc.

As a reminder, 2 CFR §200.415 (citing 18 USC §1001) requires that LEAs assert that they understand that submitting any false, fictitious, or fraudulent information, or the omission of any material fact(s), may subject the LEA employee(s) to criminal, civil, or administrative penalties for fraud, false statements, false claims or otherwise. In addition, actions of this nature would constitute a violation of the Georgia Code of Ethics (O.C.G.A. §20-2-984.1).

Reference the [Title II, Part A Source Documentation Quick Guide](#) located in the appendix of this document.

#### 4.10 Expenditures: Allowable, Reasonable, Allocable

2 CFR §§200.303, 200.403, 200.404, 200.405, ESEA/ ESSA Sec. 8306(a)(1),(3)

Costs charged to Title II, Part A must be reviewed by the designated Title II, Part A LEA Coordinator and must meet the following general criteria:

- Conform to applicable statute, regulations and guidance and generally accepted accounting principles.
- Be consistent with written internal controls (policies and procedures) that apply uniformly to both federally funded and non-federally funded LEA activities. (For example: Travel and stipends for staff receiving professional development)
- Be necessary, reasonable, and allocable to the performance of the grant.
  - **Reasonable** means costs should not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The cost should be in the LEA/school improvement plan(s); should reflect sound business practices; and should reflect market prices for comparable goods and services for the geographic area.
  - **Allocable** means able to be charged to the grant. Costs must be incurred specifically for the grant; must benefit both the grant and LEA work; must be necessary to the operation of the LEA and distinguishable as a grant asset.
- Be accorded consistent treatment with direct and indirect costs.
- Be adequately documented.

#### 4.11 Essential Questions for Determining Allowability

2 CFR §§200.403, 200.404, 200.405, ESEA/ ESSA Sec. 8306(a)(1),(3)

##### Title II, Part A Essential Questions for Determining Allowability of Expenditures

1. Does the activity/strategy meet the purpose of Title II, Part A? [ESSA Sec. 2001]
2. How is the activity/strategy aligned to the District Comprehensive Needs Assessment and District Improvement Plan? [ESSA Sec. 2102]
3. Is the activity/strategy aligned to ESSA Title II, Part A Local Use of Funds? If applicable, is each participant allowable under the Use of Funds? [ESSA Sec. 2103]
4. Is the activity/strategy evidence-based using the Title VIII definition? [ESSA Sec. 8101]
5. If professional development, does the professional development align with the Title VIII definition? [ESSA Sec. 8101]
6. Will the LEA be able to determine and report how the chosen activity/strategy improved teacher, principal or other school leader effectiveness? How will the effectiveness of each activity/ strategy be documented? [ESSA Sec. 2104]

7. Is the activity/strategy supplementing (not supplanting) non-federal funds that would otherwise be used for activities authorized under Title II, Part A? [ESSA Sec. 2301]
8. Does the activity/strategy comply with the Code of Federal Regulations? [2 CFR Part 200, 34 CFR Part 76, and 34 CFR Part 81]

#### 4.12 Title II, Part A Allowable Participants

*ESEA/ ESSA Sec. 2103(b)*

The chart below is based on ESSA Sec. 2301 - Title II, Part A Local Use of Funds (refer to [Local Use of Funds Quick Guide – Appendix C](#)) which describes the specific activities and specific allowable participants for each activity.

ESSA Sec. 2301 Title II, Part A Local Use of Funds/Types of Activities	ESSA Sec. 2301 Title II, Part A Allowable Participants
A. Evaluation System	System is to support teachers, principals, other school leaders
B. Teacher Recruitment and Retention	R & R activities for teachers, principals, other school leaders, paraprofessionals, coaches, mentors, evaluators
C. Recruitment from Other Fields	To become teachers, principals, other school leaders
D. Evidence Based Class Size Reduction	Teachers
E. High Quality, Evidence-Based Personalized Professional Development	Teachers, Instructional Leadership teams, principals, other school leaders
F. Programs/Activities to Increase Ability of Teachers to Teach SWD & EL	LEA/School staff that will support teachers or direct support for teachers
G. Programs/Activities to Increase Knowledge and Ability to Support Educators in Early Learning (through age 8) which may include PD and transition planning to Elementary	Knowledge – teachers, principals, other school leaders; Principal Support – teachers, teacher leaders, early childhood educators, school staff (paraprofessionals) and other professionals
H. Training, Technical Assistance, Capacity Building on Specific Topics	LEA/School Staff that will support teachers, principals and other school leaders or direct support for teachers, principals, and other school leaders
I. Inservice Training for School Personnel on Specific Topics	School Personnel
J. Training to Support the Identification of Gifted and Talented and High Ability	Recipients Not Specified (refer to Title II, Part A Purpose)
K. Supporting School Library Program/Instructional Services	Recipients Not Specified (refer to Title II, Part A Purpose)
L. Training for All School Personnel on Child Sexual Abuse	All School Personnel, to include: teachers, principals, other school leaders, specialized instructional support personnel, and paraprofessionals
M. Developing and Providing PD and Systems of Support Related to STEM and Computer Science	LEA/School Staff that will support teachers, principals and other school leaders or direct support teachers, principals, and other school leaders
N. Developing Feedback Mechanisms to Improve School Working Conditions	Recipients Not Specified (refer to Title II, Part A Purpose)
O. High Quality PD on Effective Strategies to Integrate Specific Topics to Help Prepare Students for Postsecondary and Workforce	Teachers, Principals, Other School Leaders
P. Other Evidence-Based Activities that Meet the Purpose of the Title (Requires State Consultation)	Recipients Not Specified (refer to Title II, Part A Purpose)

If LEAs have additional questions about Title II, Part A Use of Funds and allowable participants, please contact the LEA's assigned GaDOE Title II, Part A Education Specialist.

## 4.13 Evidence-Based Interventions

ESSA Sec. 2103(b)(3)(D-E); 8101 (21); Non-Regulatory Guidance; Federal Programs Handbook

Section 8101 provides a definition of evidence-based (see below) and ED has included a section on evidence-based in Title II, Part A non-regulatory guidance and published non-regulatory guidance primarily focused on evidence-based called *Strengthening Education Investments*. In addition, GaDOE Federal Programs has released guidance and logic models for scenarios that do not have a strong, moderate, or promising evidence-base and in which an LEA believes it could demonstrate a rationale. Refer to the [Federal Programs Handbook – Information Applicable to All Federal Programs](#).

### Section 8101 [20 USC 7801] Definitions: (21) EVIDENCE-BASED.

(A) IN GENERAL. —Except as provided in subparagraph (B), the term “evidence-based”, when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that—

- (i) demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on—
  - (I) strong evidence from at least 1 well-designed and well-implemented experimental study; or
  - (II) moderate evidence from at least 1 well-designed and well-implemented quasi-experimental study; or
  - (III) promising evidence from at least 1 well designed and well-implemented correlational study with statistical controls for selection bias; or
- (ii) (I) demonstrates a rationale based on high quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and  
(II) includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

(B) DEFINITION FOR SPECIFIC ACTIVITIES FUNDED UNDER THIS ACT. —When used with respect to interventions or improvement activities or strategies funded under section 1003, the term “evidence-based” means a State, local educational agency, or school activity, strategy, or intervention that meets the requirements of subclause (I), (II), or (III) of subparagraph (A)(i).

Title II, Part A requires LEAs funding professional development to ensure that it is high quality, personalized professional development that is evidence-based. LEAs using class size reduction as a strategy must ensure that classes are reduced to a size that is evidence-based and is used for the purpose of recruitment/retention.

Using evidence to guide decisions helps LEAs avoid

- Choosing what “seems best;”
- Doing “what we’ve always done;” and
- Following “what other districts are doing.”

## 4.14 Evidence Based: Logic Models

Edgar 77.1; ESSA Sec. 2103(b)(3)(D-E); 8101 (21); Non-Regulatory Guidance; Institute of Education Sciences; Regional Educational Laboratory at Education Development, Inc.

What is a Logic Model?

A logic model (also known as a theory of action), as defined by Part 77.1 of EDGAR, means a **well-specified conceptual framework** that identifies **key components** of the proposed process, product, strategy, or practice (i.e., the active “ingredients” that are hypothesized to be critical to achieving the **relevant outcomes**) and **describes the relationships** among the key components and outcomes, theoretically and operationally.





Using logic models can help LEAs

- better understand how to chart a course toward improved policy and practice
- bring detail to broad goals
- build understanding and promote consensus
- clarify what is appropriate to evaluate and when

### Logic Model Components

Logic models connect the work to expected outcomes – changes in student performance and achievement.

- **Resources** – include both material (instructional materials, funding, technology, personnel) and nonmaterial items (time, community support, expertise, regulations, leadership, research)
- **Activities** – processes, actions, and events which the resources achieve the intended outcomes; steps in implementing a program (Examples: PLCs, Induction Activities, Recruitment and Retention Activities)
- **Process-oriented Data (Outputs)** – results expressed in numbers; while data provide information derived from the completion of program activities, they cannot indicate whether a change has occurred
- **Intermediate Outcomes** – changes in participants' awareness, knowledge, beliefs, and behavior due to their involvement in the activity; quick adjustments in practices; changes that occur as a result of what you do
- **Impact and Long-term Outcomes** – lasting influences of program or activity implemented; long-term changes in knowledge, beliefs, and behavior (Examples: increase student achievement and graduation rate)

Engage others in the process of developing a logic model to determine the resources, activities, data, and outcomes to meet the needs of the LEA.

Properly constructed logic models show the connections linking a LEA's resources, activities, data, and outcomes. These connections show how the program is expected to operate – how each component will influence another to achieve the intended outcomes. Include what is important, focus on the most important strategies and outcomes, and use clear, specific, and concise language that describes your logic model components. Outcomes are required to demonstrate an activity's success. Which outcomes are included in a logic model depends on the LEA's needs/goals. LEAs may have only short or long-term outcomes and not all types of outcomes.

# Sample Template for Simple Logic Model

Problem statement: \_\_\_\_\_

Resources	Strategies and Activities	Process-oriented Data (Outputs)	Intermediate Outcomes	Impact and Long-Term Outcomes
<i>What resources are or could reasonably be available?</i>	<i>What will the activities, events, and such be?</i>	<i>What are the initial products of these activities?</i>	<i>What changes are expected in the short term?</i>	<i>What are the anticipated changes over the long haul?</i>

**4.15 ESSA Definition: (42) Professional Development**  
*Section 8101 [20 USC 7801]*

The term “professional development” means activities that:

(A) are an integral part of school and local educational agency strategies for providing educators (including teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, and, as applicable, early childhood educators) with the knowledge and skills necessary to enable students to succeed in a well-rounded education and to meet the challenging State academic standards; **and**

(B) are sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused, and may include activities that

- (i) improve and increase teachers’—
  - (I) knowledge of the academic subjects the teachers teach;
  - (II) understanding of how students learn; and
  - (III) ability to analyze student work and achievement from multiple sources, including how to adjust instructional strategies, assessments, and materials based on such analysis;
- (ii) are an integral part of broad schoolwide and districtwide educational improvement plans;
- (iii) allow personalized plans for each educator to address the educator’s specific needs identified in observation or other feedback;
- (iv) improve classroom management skills;
- (v) support the recruitment, hiring, and training of effective teachers, including teachers who became certified through State and local alternative routes to certification;
- (vi) advance teacher understanding of
  - (I) effective instructional strategies that are evidence-based; and
  - (II) strategies for improving student academic achievement or substantially increasing the knowledge and teaching skills of teachers;
- (vii) are aligned with, and directly related to, academic goals of the school or local educational agency;
- (viii) are developed with extensive participation of teachers, principals, other school leaders, parents, representatives of Indian tribes (as applicable), and administrators of schools to be served under this Act;
- (ix) are designed to give teachers of English learners, and other teachers and instructional staff, the knowledge and skills to provide instruction and appropriate language and academic support services to those children, including the appropriate use of curricula and assessments;
- (x) to the extent appropriate, provide training for teachers, principals, and other school leaders in the use of technology (including education about the harms of copyright piracy), so that technology and technology applications are effectively used in the classroom to improve teaching and learning in the curricula and academic subjects in which the teachers teach;
- (xi) as a whole, are regularly evaluated for their impact on increased teacher effectiveness and improved student academic achievement, with the findings of the evaluations used to improve the quality of professional development;

- (xii) are designed to give teachers of children with disabilities or children with developmental delays, and other teachers and instructional staff, the knowledge and skills to provide instruction and academic support services, to those children, including positive behavioral interventions and supports, multi-tier system of supports, and use of accommodations;
- (xiii) include instruction in the use of data and assessments to inform and instruct classroom practice;
- (xiv) include instruction in ways that teachers, principals, other school leaders, specialized instructional support personnel, and school administrators may work more effectively with parents and families;
- (xv) involve the forming of partnerships with institutions of higher education, including, as applicable, Tribal Colleges and Universities as defined in section 316(b) of the Higher Education Act of 1965 (20 U.S.C. 1059c(b)), to establish school-based teacher, principal, and other school leader training programs that provide prospective teachers, novice teachers, principals, and other school leaders with an opportunity to work under the guidance of experienced teachers, principals, other school leaders, and faculty of such institutions;
- (xvi) create programs to enable paraprofessionals (assisting teachers employed by a local educational agency receiving assistance under part A of title I) to obtain the education necessary for those paraprofessionals to become certified and licensed teachers;
- (xvii) provide follow-up training to teachers who have participated in activities described in this paragraph that are designed to ensure that the knowledge and skills learned by the teachers are implemented in the classroom; and
- (xviii) where practicable, provide jointly for school staff and other early childhood education program providers to address the transition to elementary school, including issues related to school readiness.

#### 4.16 Effective Professional Development

Section 8101 [20 USC 7801]; Darling-Hammond, L., Hyster, M. E., Gardner, M. (2017). *Effective Teacher Professional Development*. Palo Alto, CA: Learning Policy Institute.

It has been noted through research that many professional development activities appear ineffective in supporting changes in teachers' practices and student learning. To increase the effectiveness of the professional development, ESSA Section 8101(B)(iii) suggests that an activity that may be considered is to "allow personalized plans for each educator to address the educator's specific needs identified in observation or other feedback". Providing more personalized professional development opportunities that move beyond "sit and get" to opportunities that promote active learning will have a greater impact on educator practice and student achievement.

The Learning Policy Institute (2017) identifies seven components for effective professional development. They include:

1. **Is content focused:** intentional focus on teaching strategies aligned with discipline-specific development and pedagogies
2. **Incorporates active learning:** engages teachers directly in designing and trying out teaching strategies in the same style of learning they are designing for their students.
3. **Supports collaboration:** job-embedded contexts where teachers can share ideas and collaborate in their learning.
4. **Uses models of effective practice:** modeling of instruction provides teachers with a clear vision of what best practices look like (sample student work, observations of peer teachers, and videos of teaching)
5. **Provides coaching and expert support:** coaching support to allow for one-on-one sharing of expertise focused directly on teachers' individual needs.
6. **Offers feedback and reflection:** time for teachers to intentionally think about, receive input on, and make changes to their practice.
7. **Is of sustained duration:** provides teachers with adequate time to learn, practice, implement, and reflect upon new strategies that facilitate changes in their practice.

## 4.17 Additional Compensation: Supplements, Incentives, Honorariums & Stipends

2 CFR §200.430; SBOE Rule 160-3-3-.04

### **Staff Providing Professional Development (Supplements, Honorariums)**

Additional compensation may be provided to LEA staff who provide allowable professional development and/or mentoring above and beyond contractual obligations to allowable participants. Title II, Part A Non-Regulatory Guidance provides some suggestions as to how LEAs might provide compensation to support LEA authorized use of funds like mentoring for retention and professional growth opportunities. Job descriptions must be uploaded for staff receiving additional compensation.

### **Staff Attending Professional Development (Stipends)**

Title II, Part A may be used to provide stipends to allowable participants for allowable topics in alignment with SBOE Rule applied consistently to federal and non-federal situations.

- LEAs **must have a written stipend policy** as per SBOE Professional Learning Rule 160-3-3-.04. The policy should include the following components:
  - References to SBOE Citation 160-3-3-.04
  - Stipends are supplemental
  - Process for payment that reflects consistency across federal programs and non-federal programs
  - Alignment to LEA/school initiative or individual PD Plan
  - Demonstration of skills/knowledge/practices gained have been implemented in classroom/job setting
  - Beyond regular contract hours/days/school year
  - Documentation for allowability and time and effort

### **Incentives**

Additional compensation may be provided as a recruitment or retention incentive, given the LEA is targeting effective educators, particularly in high needs areas and for high needs schools. Criteria should be established and applied consistently. LEAs budgeting and expending grant money on recruitment and retention financial incentives must meet the requirements of the statute and non-regulatory guidance. Recipients of recruitment and retention financial incentives are not required to complete any work related to the grant in order to receive these incentives, thus this expenditure is not subject to Federal time and effort documentation requirements but must be documented in compliance with federal grant and local and state guidance. Required documentation for monitoring purposes must include a (1) rationale (may include specific recruitment/retention information, preferably over a period of years, that also includes documentation that records 'helping students achieve academic success'), (2) budget line item with descriptions, and (3) financial incentive recipients. For additional guidance, reference the Title II, Part A Sample Form for documentation of Recruitment and Retention Incentives. [Sample Title II, Part A form](#)

## 4.18 Common Title II, Part A Funded Items of Cost: Professional Development Costs

*ESSA Sec. 8101(42); SBOE Board Rule 160-3-3-.04; Learning Forward Professional Learning Standards; GaPSC Board Rule 505-2-.36; 2 CFR §200.473; 2 CFR §200.432; Dear Colleague Letter -2017 from ED Office of Education Technology; Title II, Part A GAN Enclosure 3; Guidance from ED Email 05.07.19 from Chris Fenton, Office of Elementary and Secondary Education*

The cost of training and education provided for employee development is allowable to the extent that it falls directly under the ESSA Title II, Part A Authorized Local Use of Funds, is in alignment with LEA student and staff needs, and is consistent with the ESSA definitions of evidence-based and professional development. In general, funded PD strategies should be ongoing (not stand-alone, 1-Day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused.

Focusing on the definition of Professional Development is especially important for LEAs and private schools with limited funding who are selecting strategies/interventions to fund with Title II, Part A.

- **Professional Development: Conferences**

- The LEA must ensure authorized expenditures related to conferences (meetings, retreats, seminars, workshops, events) for the purpose of disseminating technical information are necessary and reasonable for successful performance under the federal award. The LEA must exercise discretion and judgment to ensure conference costs are appropriate, necessary, and managed in a manner that minimizes costs to the federal award.
  - In Georgia, for a conference to be considered an allowable professional development activity, it **MUST** (1) meet the ESSA PD definition - be sustained, intensive, collaborative, job-embedded, data-driven, and classroom-focused; OR (2) connect to a personalized plan based on information from an evaluation and support system, or a larger LEA/school-wide plan.
  - If a participant is unable to attend a conference and related expenses are non-refundable, then expenditures must be paid from non-federal funds since the cost was not allocable to the federal grant under UAR 2 **CFR §200.405** as the LEA did not receive a benefit from the expenditures.
- Professional Development: Conferences and Meetings – [Title II, Part A GAN Enclosure 3]
    - LEAs must take into account the following factors when considering the use of Title II, Part A funds for conferences and meetings:
      - Ensure that attending or hosting a conference or meeting is consistent with its approved application and is reasonable and necessary to achieve the goals and objectives of Title II, Part A
      - Ensure the primary purpose of the meeting or conference is to disseminate technical information, (e.g., provide information on specific programmatic requirements, best practices in a particular field, or theoretical, empirical, or methodological advances made in a particular field; conduct training or professional development; plan/coordinate the work being done under the grant); and
      - Consider whether there are more effective or efficient alternatives that can accomplish the desired results at a lower cost, for example, using webinars or video conferencing
    - LEAs must follow all applicable statutory and regulatory requirements in determining whether costs are reasonable and necessary
    - Title II, Part A funds may be used to pay for the costs of attending a conference. Specifically, Title II, Part A funds may be used to pay for conference fees and travel expenses (transportation, per diem, and lodging) of LEA employees, consultants, or experts to attend a conference or meeting if those expenses are reasonable and necessary to achieve the purposes of Title II, Part A.
    - An LEA hosting a meeting or conference may not use Title II, Part A funds to pay for food for conference attendees unless doing so is necessary to accomplish legitimate meeting or conference business.
      - A working lunch is an example of a cost for food that might be allowable under Title II, Part A if attendance at the lunch is needed to ensure the full participation by the conference attendees in essential discussions and speeches concerning the purpose of the conference and to achieve the goals and objectives of Title II, Part A
    - LEAs are strongly encouraged to contact their assigned Title II, Part A Education Specialist with any questions or concerns about whether using Title II, Part A funds for a meeting or conference is allowable prior to committing Title II, Part A funds for such purposes. A short conversation could help avoid a costly and embarrassing mistake.
    - LEAs are responsible for the proper use of their Title II, Part A funds and may have to repay funds to ED if they violate the rules on the use of Title II, Part A funds, including the rules for meeting and conference related expenses
- Professional Development: Digital Teaching and Learning
    - **Support Teachers' Use of Digital Learning Tools** - LEAs may fund instructional/technology coaches to support teachers in integrating technology into curricula and instruction. Example: coaches might help educators learn to use selected devices, platforms, online assessments, or digital materials, or to implement technology-supported, content-specific instructional practice. (ESEA sec.2103(b)(3)(E)(i).



- **Provide Online Professional Development** - LEAs may fund creating personalized digital learning opportunities and move away from one-size-fits-all professional development. Example: blended learning professional learning, webinars, simulations, online conferences, massive open online courses (MOOCs), or online communities of practice which may help educators better understand the subjects they teach, improve instruction, demonstrate proficiency in using technology to support learning, to assist in preparing students for postsecondary education and the workforce. [ESEA secs. 2101(c)(4)(B)(ix), (xvii-ixviii); 2103(b)(3)(E)(i) and (b)(3)(M)]
- **Provide Professional Development on Blended Learning** - LEAs may fund professional development on how to implement blended projects and to supporting planning activities for blended learning programs. Example: provide initial professional learning for educators on effective blended learning model instruction, ongoing collaborative planning time, and ongoing, job-embedded professional learning opportunities to improve educator practices (access to digital PD resources, collaborative community of practice, coaching). [ESEA, secs. 2101(c)(4)(B)(ix); 2103(b)(3)(E)(i); 4109(a)(4)].
- **Support Implementation of Systems to Collect, Manage, and Analyze Data** - LEAs may fund professional development to effectively use data to improve instruction and decision-making for school improvement efforts that also protect student privacy. [ESEA secs. 2101(c)(4)(B)(xx); 2103(b)(3)(E)(ii) and (b)(3)(H)].
- **Adopt Digital Competency-Based Professional Development** - LEAs may fund the development of digital competency-based professional development (online portfolios or micro-credentials) to possibly support incentives for recruiting and retaining high-need subject teachers in low-income schools and districts. [ESEA sec. 2101(c)(4)(B)(vii)(I); 2101(c)(4)(B)(vii)(II); 2103(b)(3)(A)].

- Professional Development: Supplies

Title II, Part A funds may be used to purchase professional development supplies and instructional materials only if the expenditures are reasonable and necessary to carry out Title II, Part A allowable professional development activities. Supplies should be purchased within the period of performance and benefit professional development activities that occur during the corresponding fiscal year.

- Title II, Part A may not be used to purchase classroom supplies or materials for students or teachers. Title II, Part A may be used to purchase sample materials for teachers required for professional development purposes (for example: one copy of a student text or materials for a lab experiment required for use in professional development).
- Title II, Part A should not be used to build professional development libraries that are not being actively used in the fiscal year for PD that is ongoing, job-embedded, and based on current student and staff needs.

- Professional Development: Employees other than Teachers, Principals and Other School Leaders

Title II, Part A specifically focuses on PD for teachers, principals and other school leaders (individuals responsible for the daily operational and instructional leadership of a school). While PD is valuable for other leaders, it is not the focus of Title II, Part A. Central office staff are not listed in the authorized use of funds and superintendent training was removed in the transition from NCLB to ESSA. In general, it may be more cost effective for an LEA to send an employee for training to plan and deliver PD (train the trainer) than to contract with an external vendor.

In an effort to support LEAs in maximizing their use of Title II, Part A, the GaDOE allows Title II, Part A to fund PD for other individuals only if 1) costs are reasonable, 2) the PD is directly and explicitly used for training for teachers, principals and other school leaders within the same school year, 3) PD training is documented and meets the requirements listed in the Title II, Part A Essential Questions document.

- Professional Development: Paraprofessionals

OESE responses bulleted in italics:

(B) Developing and implementing initiatives to assist in recruiting, hiring, and retaining effective teachers, particularly in low-income schools with high percentages of ineffective teachers and high percentages of students who do not meet the challenging State academic standards, to improve within

district equity in the distribution of teachers, consistent with section 1111(g)(1)(B), such as initiatives that provide

(iii) teacher, paraprofessional, principal, or other school leader advancement and professional growth, and an emphasis on leadership opportunities, multiple career paths, and pay differentiation;

- *This use of funds does allow initiatives that could include paraprofessionals, but the funded initiative needs to be one that assists “in recruiting, hiring, and retaining effective teachers.” One could make an argument that having better prepared paraprofessionals does help retain effective teachers, but the LEA would need to demonstrate that the professional development (PD) for the paraprofessionals is intended for this purpose for the PD to be allowable under this use of funds.*

(E) Providing high-quality, personalized professional development that is evidence-based, to the extent the State (in consultation with local educational agencies in the State) determines that such evidence is reasonably available, for teachers, instructional leadership teams, principals, or other school leaders, that is focused on improving teaching and student learning and achievement, including supporting efforts to train teachers, principals, or other school leaders (In our experience it is possible to have a paraprofessional on an instructional leadership team.)

- *If a paraprofessional is part of the instructional leadership team, the PD provided under this use of funds could include paraprofessionals, but the PD does need to meet the evidence-based requirement. This probably isn’t going to be a common situation.*

(G) Providing programs and activities to increase

(i) the knowledge base of teachers, principals, or other school leaders on instruction in the early grades and on strategies to measure whether young children are progressing; and

(ii) the ability of principals or other school leaders to support teachers, teacher leaders, early childhood educators, and other professionals to meet the needs of students through age 8, which may include providing joint professional learning and planning activities for school staff and educators in preschool programs that address the transition to elementary school.

- *(G)(i) does not apply to paraprofessionals. (G)(ii) could include paraprofessionals, but this use of funds is limited to pre-K programs—if the paraprofessionals are part of the pre-K program, they could be included in any PD.*

(I) Carrying out in-service training for school personnel

- *This use of funds could include paraprofessionals, but only in the areas listed in (I)(i-iv)—this use of funds for in-service training is limited to issues related to trauma, mental health, and addiction. This use of funds is not about academics.*

(L) Providing training for all school personnel, including teachers, principals, other school leaders, specialized instructional support personnel, and paraprofessionals, regarding how to prevent and recognize child sexual abuse.

- *This use of funds could include paraprofessionals, but only in so far as the training addresses child sexual abuse.*

- **Professional Development: Alternative Certification Programs**

Georgia LEAs have historically used Title II, Part A to fund teachers in alternative certification programs. Georgia believes that alternative certification, especially for teachers teaching in high needs areas and/or in high needs schools, is a valuable job-embedded professional development opportunity that is both an investment in teachers and an investment in students. The Georgia Department of Education believes that funding alternative certification programs best aligns with Title II, Part A Authorized Use of Funds 2103 (B) and (E) and is fully aligned with the ESEA Title VIII Section 8101 definition of professional development.

The GaDOE has determined that while certification in Georgia is often reliant on the employment relationship between LEAs and teachers, the role of LEAs is to support teachers in meeting certification requirements. Educators themselves are responsible for obtaining the credentials they need for the jobs for which they are applying or are assigned. LEAs may support teachers in obtaining these credentials. Because meeting state/LEA certification requirements is a teacher responsibility, LEAs may use Title II, Part A funds to support alternative certification programs for teachers as aligned with LEA needs, particularly in high needs areas and high needs schools. LEAs must ensure that they do not use Title II, Part A funds when local funds have been used in prior years. If the LEA has supported alternative certification locally, however, has experienced precipitous decline in funding, the LEA should contact Title II, Part A program staff. As a reminder, it is important that the LEA keep detailed documentation regarding any expenditure where there may be a presumption of supplanting to ensure that its auditors have appropriate source documentation to review to support an allowable cost.

- **Professional Growth: GACE Testing**

GACE testing may be supported by Title II, Part A to the extent that it supports career advancement focusing on leadership opportunities and multiple career paths. For example, Title II, Part A could be used to pay for the GACE for paraprofessionals recruited to be teachers, teachers expanding content areas and service areas, and teachers recruited to be teacher leaders or school leaders.

#### **4.19 Common Title II, Part A Funded Items of Cost: Recruitment, Advertising, Public Relations** **2 CFR §200.421**

Title II, Part A may be used to support recruitment that is supplemental to the recruiting that LEAs would conduct in the absence of Title II, Part A.

In accordance with **2 CFR §200.421** LEAs must limit advertising and public relations costs to recruitment of personnel required for the performance of a federal award, specifically teachers in high needs areas, principals and assistant principals, and teachers and leaders serving in high poverty, high minority, underperforming schools. In Georgia, recruitment should not be funded with Title II, Part A for unallowable grant positions such as central office staff, bus drivers, speech language pathologists, etc.

In accordance with **2 CFR §200.463** LEAs may fund travel costs of employees engaged in the recruitment of personnel.

Recruitment should not include advertising costs designed solely to promote the LEA. In Georgia, recruitment costs that are allowable usually include online or print advertising for (1) teachers in high needs content areas, (2) teachers and or leaders in high needs schools, and (3) registration for recruitment fairs selected for alignment with high needs areas. *Note: Unallowable advertising includes, but not limited to: displays, banners, table cloths; promotional items and memorabilia – pens, gifts, souvenirs; costs of advertising and public relations designed solely to promote the LEA.*

#### **4.20 Common Title II, Part A Funded Items of Cost: Membership & Subscriptions** **2 CFR §200.454**

Title II, Part A may be used to support memberships and subscriptions that support high-quality, ongoing, personalized professional development that is evidence-based; however, memberships and subscriptions must be purchased for the LEA and/ or school, not for individual staff.

Memberships that can be purchased by position and are transferrable in the event of transition or vacancy, thereby benefitting the LEA or school, are allowable.

#### **4.21 Common Title II, Part A Funded Items of Cost: Travel** **2 CFR §200.475; SBOE Rule 160-5-2-.23; SAO Statewide Accounting Policy and Procedure**



LEAs must have written travel internal controls that align with federal/state laws and the state travel policy. LEAs may choose to be more restrictive, but not less. All costs should be reasonable and necessary and applied consistently to expenditures made with federal and non-federal funds. LEAs must use their written policy in the provision of equitable services. The state travel policy is reviewed and updated annually as needed, thus LEAs should also conduct an annual review of their policies as well.

Special Note: LEA staff must inquire about GSA per diem rates and select the lowest rate available at the time of booking. If this rate exceeds the GSA per diem rate, the LEA should document that this is the lowest available rate available at the time of booking. LEAs may exceed the lodging per diem rate when attending a conference and should document that it is the conference hotel. LEAs should select the least expensive option available while considering proximity to the business destination and personal safety. Allowability for a cost that exceeds the per diem rate may require additional explanation and documentation.

Per the Statewide Travel Policy, when lodging is shared, the traveler paying for the lodging seeks reimbursement for the full expense.

#### 4.22 Common Title II, Part A Funded Items of Cost: Food

*ED Memorandum, FAQs, Dear Colleague Letter, Title II, Part A GAN Enclosure 3*

In general, LEAs using Title II, Part A grant money to purchase food face a high burden of proof to show that the purchase is necessary to meet the goals and objectives of the grant. The LEA Title II, Part A GAN Enclosure 3 highlights that Title II, Part A funds may not be used to pay for food for conference/meeting attendees unless doing so is necessary to accomplish legitimate meeting or conference business. ED also published three guidance documents that detail various FAQs around using federal funds to pay for food at conferences and meetings. These documents may be accessed on the Title II, Part A webpage under Guidance and Resources.

#### 4.23 Class Size Reduction

*ESSA Sec. 2103(D); Title II, Part A Non-Regulatory Guidance*

Any teachers hired with Title II, Part A funds must be supplemental to those required by State rule 160-5-1-.08, or class size maximums officially established by Charter LEAs or Strategic Waiver School Systems.

#### Questions LEAs must answer in determining when Title II, Part A funds may be used to reduce class size

- Which prioritized student achievement need(s) does the class size reduction strategy address?
- If Title II, Part A funds have been used in the past to reduce class size, does documentation support the effectiveness of the strategy in addressing prioritized needs in previous years?
- How many state or locally paid teachers are required to meet maximum class size requirements?
- Are the classes self-contained?
- Are the classes departmentalized?
- What delivery model is used for special programs (EIP, REP, Gifted)?

#### Reducing class size using Title II, Part A funds in EIP, REP, Gifted, and Special Education Programs

- Title II, Part A funds may be used to reduce the overall class size of regular education classes where an inclusion/augmented model is used to serve students in the EIP, REP, Gifted Program, or Special Education Program. Augmented or inclusion models for special populations and/or programs requiring augmented/inclusion teachers are paid by the funds generated by the higher FTE weight assigned to the special population, therefore reducing class size with Title II, Part A funds is considered supplemental.
- Where reduced class size is the delivery model used to implement special programs (EIP, REP, Gifted), state/local funds must **FIRST** be used to reduce class size to comply with GaDOE (or for Charter LEAs and Strategic Waiver School Systems officially established) class size guidance. **AFTER** an LEA has reduced class size to meet the special program requirements, Title II, Part A funds may be used to further reduce class size.

**Documentation maintained by LEA (and submitted as an attachment to the CLIP at the time of original budget submission) as evidence Title II, Part A funded class size reduction teachers are supplemental to**

**those required by State rule 160-5-1-.08, or class size maximum officially established by Charter LEAs or Strategic Waiver School Systems.**

- Current Year Class Size Reduction Worksheet
- Official verification of LEA established class size maximums for current year (statement of board action signed by Superintendent, LEA administrative procedure including class size maximums signed by Superintendent, etc.) (Charter LEAs and Strategic School Waiver Systems waiving State board class size rule)
- School master schedule in *chart format* for each school in which a class size reduction teacher is placed; both first and second semesters if applicable
  - Delivery model for the EIP, REP, Gifted, Special Education by school, grade level, and/or content area indicated on the master schedule
  - Daily schedule for all teachers in the school or at least in the grade level or content area where CSR teacher is placed
  - Daily schedules of teachers grouped by grade level or content area (i.e., all first-grade teachers followed by second grade teachers, etc. or all math teachers followed by science teachers etc.);
  - Self-contained classes:
    - Grade level
    - Total number of students in each class
    - Number of regular education students
    - Number of students being served in EIP
    - Number of students being served in REP
    - Number of students being served in Gifted
  - Departmentalized classes:
    - Course name for each class
    - Total number of students in each class
    - Number of regular education students
    - Number of students being served in EIP
    - Number of students being served in REP
    - Number of students being served in Gifted

**4.24 Budget Considerations and Reminders: Year-End Closeout**

The following chart lists considerations and reminders to think about when submitting budget amendments and closing out the budget at the end of the grant cycle.

Title II, Part A Budget Reminders for End of the Grant Period
• Have you collected implementation documentation and effectiveness data for all Title II, Part A funded activities and strategies?
• Have you analyzed data to determine effectiveness of all Title II, Part A activities and strategies and determined if the activities or strategies will be continued for the next grant period?
• Have you documented all evidence-base determinations and collected documentation for evidence-base of all professional development activities and for Class Size Reduction?
• Have you reviewed the Title II, Part A Expenditure Detail Report for the year to ensure all expenditures are correct?
• Have you collected all supporting documentation for each Title II, Part A expenditure, including time and effort documentation for payroll expenses to include salaries, substitutes and stipends?
• Have extenuating circumstances impacted your private schools and their ability to spend Title II, Part A funds? If so, you may want to consider requesting approval from the Ombudsman for private school carryover funds.
• If you transferred Title II, Part A funds, have those funds been drawn down 100%?
• Do you have supporting documentation for each Title II, Part A drawdown and the annual Completion Report?
• Do the expenditures in your Completion Report match the items in your approved budget?
• Have you worked with your finance department to ensure your Completion Report was submitted by October 30 <sup>th</sup> ?
• Have you collected all documentation for records information management and followed procedures for maintaining records for their life cycle?

# **PROVISION OF EQUITABLE SERVICES**

## **5.1 Provision of Equitable Services**

*ESEA Section 8501*

LEAs are required to provide equitable services to private schools.

- Allocations are determined in consultation and by formula outlined in the law
- Allowability is restricted to ESEA LEA authorized use of funds with the exception of CSR teachers.

Guidance is provided by the federal government through existing and new non-regulatory guidance. Guidance is provided in Georgia jointly by federal programs in the [Federal Programs Handbook](#), and the [State Ombudsman webpage](#) of the GaDOE website.

## **5.2 Provision of Equitable Services: Consultation**

*ESEA Section 8501; GaDOE Equitable Services Consultation Guide and Handbook*

CONSULTATION— Title VIII (IC, IIA, IIIA, IVA, IVB) (ESSA 8501) (1) IN GENERAL.—To ensure timely and meaningful consultation, a State educational agency, local educational agency, educational service agency, consortium of those agencies, or entity shall consult with appropriate private school officials. Such agency and private school officials shall both have the goal of reaching agreement on how to provide equitable and effective programs for eligible private school children, on issues such as—

- (A) how the children’s needs will be identified;
- (B) what services will be offered;
- (C) how, where, and by whom the services will be provided;
- (D) how the services will be assessed and how the results of the assessment will be used to improve those services;
- (E) the size and scope of the equitable services to be provided to the eligible private school children, teachers, and other educational personnel, the amount of funds available for those services, and how that amount is determined;
- (F) how and when the agency, consortium, or entity will make decisions about the delivery of services, including a thorough consideration and analysis of the views of the private school officials on the provision of services through potential third-party providers; and
- (G) whether the agency, consortium, or entity shall provide services directly or through a separate government agency, consortium, or entity, or through a third-party contractor; and
- (H) whether to provide equitable services to eligible private school children—
  - (i) by creating a pool or pools of funds with all of the funds allocated under subsection (a)(4)(C) based on all the children from low-income families in a participating school attendance area who attend private schools; or
  - (ii) in the agency’s participating school attendance area who attend private schools with the proportion of funds allocated under subsection (a)(4)(C) based on the number of children from low-income families who attend private schools.

**Initiating Consultation:** The LEA is responsible for initiating consultation. Consultation must occur before an LEA makes any decision that affects the opportunities of private school students and teachers to receive equitable services. This must occur in the school year prior to the start of services. GaDOE recommends initiating consultation during the fall of the school year prior to services.

**Ongoing Consultation:** At a minimum, consultation must occur:

- Prior to implementation – to develop plans for implementation.
- During implementation –to confirm that plans are being executed as designed and agreed upon.
- After implementation – to verify that services occurred as planned and were equitable in nature.

### Format of Consultation:

- Timing: LEAs and private school officials should talk about school calendars and school hours. They should customize the timing of consultation so that it suits both parties.
- Method: Meetings between the LEA and non-public school officials need not occur in person. Phone, email, and video conferencing are all allowable methods for consultation. Both parties should be mindful of what is available for communication and what is preferred.
- Backup Plans: It is a best practice to establish a secondary method of communication if the primary method (like office phone line) becomes inaccessible. Further, it is a best practice to identify an additional staff member who could provide assistance in the event that the primary contact is unavailable due to unforeseen circumstances and after several attempts have been made to reach out through multiple methods.

Establishing Deadlines: It may be necessary to set deadlines to reasonably plan for and implement equitable services. This should be discussed by both parties. Failure to meet deadlines without communication by either party may be seen as declining funds (private schools) or noncompliance with the provision of equitable services (LEAs). Prior to the end of the original grant period and prior to the end of the carryover period, LEAs may set reasonable deadlines for processing requests to ensure LEA staff can process all public and private school grant administration prior to required reporting to the Georgia Department of Education and the United States Department of Education.

Additional information on Equitable Services Consultation is located on the [State Ombudsman webpage](#) of the GaDOE website.

### **5.3 Provision of Equitable Services: Nonprofit Status**

*§75.51; 34 CFR 77.1.; GaDOE Equitable Services Consultation Guide and Handbook*

Edgar defines Nonprofit, as applied to an agency, organization, or institution, means that it is owned and operated by one or more corporations or associations whose net earnings do not benefit, and cannot lawfully benefit, any private shareholder or entity.

A private school must demonstrate that it is a nonprofit organization. GaDOE recommends establishing nonprofit status during consultation and requires verifying nonprofit status annually. A private school may show that it is a nonprofit organization by any of the following means:

- (1) 501(c)(3): Proof that the Internal Revenue Service currently recognizes the applicant as an organization to which contributions are tax deductible under section 501(c)(3) of the Internal Revenue Code;
- (2) State Nonprofit: A statement from a State taxing body or the State attorney general certifying that:
  - The organization is a nonprofit organization operating within the State; and
  - No part of its net earnings may lawfully benefit any private shareholder or individual;
- (3) Nonprofit Incorporation Documents: A certified copy of the applicant's certificate of incorporation or similar document if it clearly establishes the nonprofit status of the applicant; or
- (4) Nonprofit Under Parent Organization: Any item described in (1) through (3) if that item applies to a State or national parent organization, together with a statement by the State or parent organization that the applicant is a local nonprofit affiliate.

Additional information is located on the [State Ombudsman webpage](#) of the GaDOE website.

### **5.4 Provisions of Equitable Services: Private School Title II, Part A Allocations**

*ESSA Sec. 2102 [20 U.S.C. 6612]; ESSA Sec. 8501(a)(4); Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements Under the Elementary and Secondary Education Act of 1965 (ESEA), as Amended by the Every Student Succeeds Act (ESSA) 2016*

Section 8501(a)(4) of the ESEA, as amended by the ESSA, requires that expenditures for educational services and other benefits for eligible private school children, their teachers, and other educational personnel serving

those children, under Title II, Part A, be equal to expenditures for the public school program, taking into account the number and educational needs of the children to be served.

Georgia determines the amount required for Title II, Part A equitable services to participating private schools based on the relative enrollment of public and private school students. In an effort to avoid duplicative enrollment numbers, enrollment data is captured the first Tuesday of October (an official Data Collections student count date). Other factors impacting enrollment include the amount reserved for administrative costs for public and private school programs (function code 2230).

The Title II, Part A program makes available to LEAs annually the Title II, Part A Equitable Services Allocations based on data submitted to the Ombudsman. Each LEA's private school calculations for equitable services is located on the [State Ombudsman webpage](#) of the GaDOE website.

<b>Example of Formula to Determine Amount for Title II, Part A Equitable Services</b>	
<b>A. Number of Students</b>	
A1: LEA Enrollment (K-12)	900
A2: Participating Private School Enrollment	100
A3: Total Enrollment = A1 + A2	1000
<b>B. Title II, Part A Allocation</b>	
B1: LEA Allocation	\$1,000,000
B2: Administrative Costs (for public and private school programs)	\$50,000
B3: LEA Allocations Minus Administrative Costs = B1 - B2	\$950,000
<b>C. Per Pupil Rate</b>	
C1: B3 divided by A3	\$950
<b>D. Equitable Services</b>	
Amount LEA must reserve for equitable services for participating private schools Enrollment = A2 x C1	\$95,000

**ESSA SEC. 2102. [20 U.S.C. 6612] SUBGRANTS TO LOCAL EDUCATIONAL AGENCIES.**

**(a) ALLOCATION OF FUNDS TO LOCAL EDUCATIONAL AGENCIES -**

**(1) IN GENERAL.**—From funds reserved by a State under section 2101(c)(1) for a fiscal year, the State, acting through the State educational agency, shall award subgrants to eligible local educational agencies from allocations described in paragraph (2).

**(2) ALLOCATION FORMULA.**—From the funds described in paragraph (1), the State educational agency shall allocate to each of the eligible local educational agencies in the State for a fiscal year the sum of— (A) an amount that bears the same relationship to 20 percent of such funds for such fiscal year as the number of individuals aged 5 through 17 in the geographic area served by the agency, as determined by the Secretary on the basis of the most recent satisfactory data, bears to the number of those individuals in the geographic areas served by all eligible local educational agencies in the State, as so determined; and (B) an amount that bears the same relationship to 80 percent of the funds for such fiscal year as the number of individuals aged 5 through 17 from families with incomes below the poverty line in the geographic area served by the agency, as determined by the Secretary on the basis of the most recent satisfactory data, bears to the number of those individuals in the geographic areas served by all the eligible local educational agencies in the State, as so determined.

**Excerpt Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements under the Elementary and Secondary Education Act of 1965 (ESEA), as Amended by the Every Student Succeeds Act (ESSA), 2016**

P-2. How does an LEA determine the amount required for Title II, Part A equitable services to private school teachers and other educational personnel now that this amount must be determined based on the LEA's total Title II, Part A allocation?

The amount an LEA must reserve to provide equitable services for private school teachers and other educational personnel for Title II, Part A services is based on the LEA’s total Title II, Part A allocation, less administrative costs. The LEA determines the amount of funds available for Title II, Part A equitable services for private school teachers and other educational personnel by calculating, on a per-pupil basis, the amount available for all public and private school students enrolled in participating private elementary and secondary schools in areas served by the LEA (regardless of a student’s residency), taking into consideration the number and needs of the children, their teachers and other educational personnel to be served.

### 5.5 Provision of Equitable Services: Carryover

ESEA sections 8501(a)(4)(B) and 8501(c); 2016 Non-Regulatory Guidance (Fiscal Changes); Equitable Services Consultation Guide and Handbook

Under Title I and Title VIII (which includes Title II, Part A), LEAs are required provide equitable services in the fiscal year for which the funds were appropriated to ensure that eligible students, teachers and other educational personnel, and families receive the services to which they are entitled in a timely manner. However, there may be extenuating circumstances, in which an LEA is unable to obligate all funds within this timeframe in a responsible manner. Under these circumstances, the funds may remain available for the provision of equitable services under the respective program during the subsequent school year. LEAs and private schools should note in ES4PS Form B whether carryover is available and how it will be distributed in the following year. It is possible to provide/receive satisfactory services and face extenuating circumstances that will allow carryover. The State Ombudsman must approve all carry-over requests.

Program	Services Provided as Planned or Private School Declines Funds/Closes	Extenuating Circumstances*
<b>Title I, Part A</b>	Funds are redistributed to participating private schools. If there are no participating private schools, funds may be used by the LEA.	The LEA must use the funds to provide equitable services to qualified children in the affected private schools the following year.
<b>Title VIII Programs (Title II, Part A)</b>	Funds are redistributed to participating public and private schools using PPA.	The LEA must use the funds to provide equitable services to qualified children in the affected private schools the following year.

\*Extenuating circumstances may include, but are not limited to: natural disaster, inability to employ qualified personnel, change in LEA/private school staff mid-year, and/or unexpected procurement challenges.

Additional information for Equitable Services carryover is located on the [State Ombudsman webpage](#) of the GaDOE website.

### 5.6 Georgia Questions About Equitable Services Asked 06.05.17

Answers Provided by J. Morrissey of the Office of Nonpublic Education (ONPE) on 08.03.17



#### GA QUESTION: Does the term ‘secondary school’ as it is defined in ESSA Title VIII apply both to public and private schools?

- o **ONPE RESPONSE:** The Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA) defines secondary school in section 8101(45):  
 (45) SECONDARY SCHOOL- The term secondary school' means a nonprofit institutional day or residential school, including a public secondary charter school, that provides secondary education, as determined under State law, except that the term does not include any education beyond grade 12.

The definition applies to both public and private schools and is dependent on the state's definition of secondary school.

**GA QUESTION: If a public school district does not use Title II, Part A funds to support courses leading to degrees or advanced credentials, is the district nevertheless obligated to offer these services to the private schools upon request?**

○ **ONPE RESPONSE:** The ESEA confers on each LEA the responsibility for determining, after appropriate consultation 8501(a)(3) of the ESEA requires that the district's provision of services to private school teachers must be "equitable in comparison to services and other benefits for public school ... teachers participating in the program...."

Department regulations in 34 Code of Federal Regulations (CFR) 299.7(c) require a district to examine the particular needs of private school teachers and not simply make available to private school teachers the kinds of services it makes available to public school teachers.

In implementing these provisions, each LEA is responsible for determining, on the basis of the consultation process, the kinds of professional development opportunities that private school teachers will have available. The LEA decision must reflect how private school teachers, consistent with the availability of Title II, Part A funds, can best secure the professional development they need to address their own identified teaching needs. How the needs of private school teachers will be assessed is a topic for consultation between the LEA and private school officials, and it may be that through the process of assessing the teaching needs of private school teachers, the needs of private school teachers will not be the same as those of public school teachers. As with services for public school teachers, any Title II, Part A expenditures for private school teachers must be reasonable and necessary to carry out the purposes of the program.

In general, we believe that an LEA can (and should), in carrying out its responsibility to provide equitable services to private school teachers, establish policies that, for reasons of effectiveness, quality, cost, and other relevant factors, favor certain kinds of courses or other forms of professional development that the Title II, Part A statute authorizes over others. However, we do not believe that 34 CFR 299.7(c) permits a district to establish a blanket rule that forbids any private school teacher from receiving certain forms of professional development that the Title II, Part A statute otherwise authorizes and that best meet that teacher's identified teaching needs related to improving student academic achievement.

**GA QUESTION: The 2003 Title I Private School non-regulatory guidance D-6 states that Title I cannot pay for substitute teachers. Does this also apply to Title II, Part A?**

○ **ONPE RESPONSE:** Yes. The same principle applies. Equitable services under Title II, Part A may not be used for substitute teachers in a private school because contracts for private school teachers and staff would be inconsistent with the requirements in ESEA section 8501(d) regarding public control of funds and the supervision and control of employees or contractors. For more information, please see P-3 of the Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements under the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA).

**GA QUESTION: The 2003 Title I Private School non-regulatory guidance B-58 states that administrative costs for third-party contractors providing equitable services to private school participants must come off the top of the LEA's Title I allocation. Does this also apply to Title II, Part A?**

○ **ONPE RESPONSE:** See P-2 of the November 21, 2016 Non-Regulatory Guidance on Fiscal Changes and Equitable Services Requirements under the ESEA, as amended by the ESSA (Fiscal Guidance), regarding Title I. Administrative costs for equitable services for Title I, Part A now come from the total amount reserved for equitable services. However, for programs covered

under Title VIII (including Title II, Part A) administrative costs are to be reserved off-the-top. All costs associated with the administration of a third-party contract should come from the LEAs total administrative set-aside.

**GA QUESTION: Would you consider the following Q & A still applicable?**

(G-12) May Title II, Part A funds be used to pay for a private school teacher's attendance at a professional conference sponsored or conducted by a faith-based organization?

Yes. To the extent that the conference is part of a sustained and comprehensive secular professional development plan for the teacher, then Title II, Part A funds may be expended to pay for the portion of the costs of the conference that, as determined by the LEA, represent the secular professional development in which the teacher participated. In this case, the LEA would pay or reimburse the teacher for attendance at the conference. Please note that the conference, as professional development, must meet the definition of professional development in section 8101(42) of the ESEA, as amended by the ESSA.

- **ONPE RESPONSE: Yes, this response is still applicable.**

**GA QUESTION: Would you consider the following Q & A still applicable?**

(G-18) If a private school requires and annually provides, as part of its teacher contract, four days of professional development, may the LEA provide, on these same days, professional development supported by Title II, Part A funds?

If the private school is legally bound by contract to provide a certain level of professional development, it would presumably provide those services regardless of whether Federal funds are available, and it would be supplanting to use Federal funds to provide professional development in place of those services. The law requires that all uses of Title II, Part A funds supplement non-federal funds that would otherwise be used for activities, and hence, the professional development provided with Federal funds

- **ONPE RESPONSE:**
  - **Yes, this response is still applicable.**
  - **Needs to be in addition to, and not in place of, what the private school would otherwise provide.**
  - **Please note that the conference, as professional development, must meet the definition of professional development in section 8101(42) of the ESEA, as amended by the ESSA.**

**GA QUESTION: Would you consider the following Q & A still applicable?**

(G-21) May an LEA require private school representatives to submit an application in order to receive services for the teachers in a private school with Title II, Part A funds?

LEAs may request documentation, as needed, from private school officials that can help the LEA identify services that may be appropriate to the needs of private school teachers. However, requiring a formal application may, depending upon its form and content, constitute an administrative barrier that is inconsistent with the LEA's responsibility to ensure equitable participation of private school teachers.

- **ONPE RESPONSE:**
  - **Yes, this response is still applicable.**
  - **Please note that ESEA section 8501(c)(1) requires an LEA to consult on not only the provision of equitable services but the LEA's process for determining equitable services as well.**

**GA QUESTION: Would you consider the following Q & A still applicable?**

(G-24) May professional development be conducted within private schools?

Yes, professional development activities may be conducted in the private school facilities.

- **ONPE RESPONSE: Yes, this response is still applicable.**

**GA QUESTION: Would you consider the following language applicable?**

(G-2) Participation is considered to be equitable if the public and private educational agencies and institutions: (1) assess, address, and evaluate the needs and progress of both groups of teachers in the same manner; (2) provide approximately the same amount of training and, where appropriate, instruction to teachers with similar needs; (3) spend an equal amount of funds per student to serve public and private school teachers;



and (4) provide private school teachers with an opportunity to participate in Title II, Part A program activities equivalent to the opportunity provided public school teachers.

- **ONPE RESPONSE: Yes, this response is still applicable. Also see 34 CFR 299.7.**

**GA QUESTION: Would you consider the following language applicable?**

(G-7) What happens if an LEA chooses not to participate in the Title II, Part A program and a private school in that LEA expresses a desire to do so? There is no authority for allowing non-public schoolteachers to receive services if the LEA elects not to participate in the program, nor does the program statute authorize an SEA to reallocate funds to another LEA for the purpose of allowing participation of teachers at a private school located in a nonparticipating LEA.

- **ONPE RESPONSE:**

- **Yes, this response is still applicable.**
- **Please note, consistent with FAQ U-4 in the Department’s November 21, 2016 Non-Regulatory Guidance on Fiscal Changes and Equitable Services Requirements under the ESEA, as amended by the ESSA, if the LEA is considering transferring Title II, Part A funds to another ESEA program, the LEA must consult with private schools prior to the transfer of funds.”**

**GA QUESTION: Is it allowable to use Title II, Part A funds for private school teacher bonuses/staff incentives?**

- **ONPE RESPONSE (answered through the Office of Attorney General’s team 1/4/21):**

- **No, an LEA may not use Title II, Part A funds allocated for equitable services to support teacher bonuses or retention incentives in participating private schools. Subsidizing any portion of a private school teacher’s salary would be inconsistent with the requirements in section 8501(d) of the Elementary and Secondary Education Act of 1965 regarding public control of funds and the supervision and control of employees or contractors. In addition, Title II funds used for equitable services may only be used to meet the specific needs of students enrolled in a private school, rather than the needs of the private school itself or the general needs of the students enrolled in the private school. See 34 CFR 299.8(b). Here, the bonuses or incentives would benefit the school as a whole, rather than the specific needs of students or teachers, and therefore, Title II, Part A funds may not be used to pay for the bonuses or incentives.**

# RECORDS RETENTION AND MONITORING

## 6.1 Records Information Management (RIM)

2 CFR §§200.313(d)(1); 200.333, 200.335; 34 CFR §81.31(c); Federal Programs Handbook

Records retention is the traditional term applied to the safeguarding of important LEA records that document decisions, policies, financial activities and internal controls. Traditionally, the word “records” was used to denote a written proof useful as evidence of a truth or fact – written, drawn, or memorialized representation of thoughts.

Records Information Management is the contemporary term applied to the professional practice of managing the records of an LEA throughout their life cycle, from the time the records are created to their eventual disposal. This includes identifying, classifying, storing, securing, retrieving, tracking and destroying or permanently preserving records. Contemporary records or more accurately, “business objects or information assets” may include printed documents, text messages, emails, electronic surveys, database elements, videos, audio files, etc. – any asset created for business purposes. (*ARMA International – Glossary of Records and Information Management Terms, 3<sup>rd</sup> Edition*)

- When original records are electronic and cannot be altered, there is no need to create and retain paper copies. LEAs must ensure electronic media is subject to periodic quality reviews, must provide reasonable safeguards against alteration and remain readable. As technology improves, if keeping electronic records, LEAs must ensure records are accessible and machine-readable.
- LEAs are encouraged to keep all documentation electronically.

2 CFR §200.313(d)(1) requires that property records include: (1) description of property, (2) a serial number or other identification number, (3) the source of funding for the property (including the FAIN)-see *chart below*.

<b>Fiscal Year</b>	<b>Grant</b>	<b>PR/ Award # (FAIN) (Federal Award ID Number)</b>	<b>CFDA (Catalog of Federal Domestic Assistance)</b>
<b>FY17</b>	Title II, Part A	S367A160001	84.367A
<b>FY18</b>	Title II, Part A	S367A170001	84.367A
<b>FY19</b>	Title II, Part A	S367A180001	84.367A
<b>FY20</b>	Title II, Part A	S367A190001	84.367A
<b>FY21</b>	Title II, Part A	S367A200001	84.367A

(4) who holds title, (5) the acquisition date, (6) cost of property, (7) percentage of Federal participation in the project costs for the Federal award under which the property was acquired, (8) the location of property (9) use and condition of the property, (10) and any ultimate disposition data including the date of disposal and sale price of the property, if applicable.

All financial and programmatic records and supporting documents must be kept for three years from the date the LEA submits its Completion Report to GaDOE (due date October 30). However, any LEA with carryover must maintain records for five years. The GaDOE recommends all grant records are maintained for five years.

If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the 3-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular 3-year period, whichever is later.

LEA Federal Programs staff should follow the Records Retention Schedule for his/her LEA as long as that schedule includes, at a minimum, the Federal requirements.

**Grant Period as it Impacts Inventory**  
(Retention Requirements for Records: 2 CFR § 200.333 and 34 CFR 81.31(c))

YEAR 1												YEAR 2												YEAR 3												YEAR 4												YEAR 5											
Jul.	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul.	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul.	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul.	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	Jun.	Jul.	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	Jun.
GRANT 1 - ORIGINAL 15 MONTH ALLOCATION												GRANT 1 - 12 MONTH CARRYOVER PERIOD																																															
												GRANT 2 - ORIGINAL 15 MONTH ALLOCATION												GRANT 2 - 12 MONTH CARRYOVER PERIOD																																			
																								GRANT 3 - ORIGINAL 15 MONTH ALLOCATION												GRANT 3 - 12 MONTH CARRYOVER PERIOD																							

**6.2 Inventory Management**  
2 CFR §§200.334, 200.336; 34 CFR §81.31(c); Federal Programs Handbook

The Elementary and Secondary Education Assistance Act of 1965 (ESEA) reauthorized by the Every Student Succeeds Act of 2015 (ESSA) requires, among other things, that Local Educational Agencies (LEAs) implement and maintain financial management systems that substantially comply with federal systems management requirements. These requirements, detailed in 2 C.F.R., Part 200.303 states that LEAs shall provide: “effective control over and accountability for all funds, property, and other assets. Recipients shall adequately safeguard all assets and assure they are used solely for authorized purposes”.

General Education Provisions Act (GEPA) Sec. 443(a) requires each recipient of federal funds to keep records which fully disclose the amount and disposition of the funds, the total costs of the activity for which the funds are used...and such other records as will facilitate an effective financial or programmatic audit.

An inventory shall be maintained for (equipment) all tangible personal property, including information technology systems, having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds \$5,000. Supplies are tangible personal property other than those described as equipment. Note: A computing device is a supply if the acquisition cost is less than \$5,000.

LEAs are not required to track consumable items, but are required to maintain an inventory of pilferable items (those easily lost or stolen) which may include, but not limited to: computers, DVD players, projectors, cell phones, iPads, tablets, iPods, graphing calculators, cameras, camcorders, computer equipment, and televisions.

Inventory requirement may vary for LEAs participating in the schoolwide consolidation of funds.

Requirements are further explained in the [Federal Programs Handbook – Information Applicable to All Federal Programs](#).

**6.3 Performance Monitoring and Evaluation of Effectiveness**  
34 CFR §76.591; 2 CFR §§200.301, 200.328; ESEA Sections 2102, 2104; Non-Regulatory Guidance



“Reform is always a work in progress. Since the world is a dynamic place and conditions within schools and communities change over time, there is no guarantee that a strategy that works today will work equally well tomorrow...Evaluation can help schools determine how to adjust the reform process to meet selected objectives.”  
*Fitting the Pieces: Education Reform That Works*, US Department of Education, October 1996

Program evaluation has two purposes: formative (improvement) and summative (effectiveness).

Performance Monitoring

Performance monitoring involves regularly collecting and analyzing data in order to track progress against identified targets and goals. Performance monitoring can help identify whether key elements of a logic model are being implemented as planned and whether the intervention is meeting intermediate goals and may

suggest how the intervention could be adjusted for continuous improvement. Performance data can also provide insight into whether the expected outcomes are being achieved. This constitutes examining the effects of an intervention (demonstrates a rationale).

### Evaluation of Effectiveness

Rigorous evaluations measure the effectiveness of an intervention, answering questions about the impact of a specific intervention on student or educator outcomes.

Federal law and regulations require SEAs and LEAs to monitor and measure the impact of Title II, Part A funds to assure compliance with applicable Federal requirements and performance expectations are being achieved. In Georgia, monitoring and measuring impact of use of Title II, Part A funds through:

- SEA – ConApp program information tab – data collection forms
- LEA – Optional Title II, Part A LEA effectiveness documentation form, **evaluation analysis of effectiveness**, SI Dashboard, local data sources

In Georgia, effectiveness of funded activities is evaluated at the following levels:

- Effective – Maintain
- Effective – Adjust
- Effective – Abandon
- In-Effective – Adjust
- In-Effective - Abandon

LEAs must plan in advance for how effectiveness will be evaluated for funded allowable Title II, Part A activities. LEAs must support their evaluation of effectiveness with an analysis of the data and the supporting documentation. The LEA's analysis should describe how each funded activity and the related data support the LEA's evaluation of effectiveness to meet the purposes of Title II, Part A. The SEA will review the analysis of effectiveness annually and the supporting documentation during cross-functional monitoring.

Reference the Optional [Title II, Part A Effectiveness Documentation Form](#) in the appendix of this handbook.

### **6.4 GaDOE Monitoring, Self-monitoring, Monitoring Schools, Single Audits**

**2 CFR §§200.207, 200.328, 200.331, 200.338, 200.410, 200.501; ESEA/ESSA 8306 (a)(2)(B)(3-6); 34 CFR §81.34; Federal Programs Handbook**

#### GaDOE Monitoring

As the state pass through entity, GaDOE is responsible for overseeing the successful implementation of Title II, Part A in LEAs (including LEA provision of Equitable Services). GaDOE does this through technical assistance (application and budget approval), annual risk assessment, periodic cross-functional and program-specific monitoring, LEA self-monitoring and single audit monitoring and resolution. According to the Uniform Grants Guidance (2 CFR 200.328), monitoring by the non-federal entity must cover each program, function, or activity. Georgia's monitoring process is further explained in the [Federal Programs Handbook – Information Applicable to All Federal Programs](#).

According to 2 CFR Part 200.207, the GaDOE may impose additional specific award conditions as needed when an LEA (1) has a history of failure to comply with the general or specific terms and conditions of Title II, Part A, (2) fails to meet expected performance goals, or (3) is not otherwise responsible. The additional conditions may include items such as the following:

- Withhold authority to proceed to next phase until receipt of evidence acceptable performance within a given period of performance
- Require additional, more detailed financial reports
- Require additional Title II, Part A monitoring
- Require the non-Federal entity to obtain technical assistance or management assistance
- Designation of High-Risk LEA with the possibility of being placed on invoice review
- Establish additional prior approvals

The GaDOE works with LEAs to achieve voluntary compliance before applying enforcement options. As the fiscal agent and in compliance with the Federal Grant Award Notification (GAN) and 2 CFR Part 200.338 the GaDOE may take the following actions, as appropriate in the circumstances, if it is determined that a LEA has failed to comply with program requirements.

- Order the LEA to cease and desist
- Disallow (deny both use of funds and matching credit) for all or part of the cost of the activity or action not in compliance
- Recover funds for all or part of the cost of the activity or action not in compliance
- Temporarily withhold cash payments pending correction of the deficiency by the recipient or subrecipient or more severe enforcement action by the awarding agency
- Wholly or partly suspend or terminate the current Federal Award
- Withhold further awards for the program
- Initiate suspension or debarment proceedings (2 CFR §180)
- Take other remedies that may be legally available. (34 CFR §81)

In all instances, a LEA is expected to comply with processes and procedures outlined in a corrective action plan and/ or notification.

**6.5 Risk Assessment**  
*2 CFR §200.331(b)(1-4); COSO Framework 2013*

A risk assessment is a systematic process of evaluating the potential risks that may be involved in a projected activity or undertaking. The Committee of Sponsoring Organizations of the Treadway Commission (COSO) identifies four risk assessment principles that are important, but not required.

4 Principles	Risk Areas
• Clear organization objectives	• Strategic - political risk and risk from dependencies on other organizations
• Identify and analyze risks to achievement of organization objectives	• Financial - risk of audit findings and poor reporting integrity
• Consider the potential for fraud	• Compliance – fraud risk and non-programmatic noncompliance
• Identify and assess changes in the organization on an ongoing basis (both externally and internally) that could significantly impact risk	• Operation – lack of resources and technology

The Division of Federal Programs conducts a risk assessment using a combination of elements defined by the GaDOE. An LEA’s risk assessment rating is determined by using both its risk rating, based on a set of established High-Risk Elements developed by the Division of Federal Programs and a risk rating from GaDOE’s Financial Review Division.

During the summer of each year, the Division of Federal Programs completes a risk assessment to determine if an LEA falls into the high-risk category. The results of the risk assessment determine which LEAs may be added to the regular CFM cycle for that year. The GaDOE has the responsibility to monitor high-risk LEAs (2 CFR §200.331(b)(1-4)). The Division of Federal Programs defines high-risk as:

- LEAs showing evidence of serious or chronic compliance problems
- LEAs with financial monitoring/audit findings; and/or LEAs with a high number of complaints from parents and other stakeholders about program implementation.
- Other elements that may cause an LEA to be determined high-risk include size of allocation and new federal programs for fiscal management personnel in the LEA.
- High-risk does not necessarily mean an LEA is not meeting the requirements of the program, federal regulations, or administrative procedures. It does mean that an LEA may be at a higher risk of having

program elements that could cause it to not meet requirements associated with federal rules, regulations, and administrative procedures.

## 6.6 Complaints Received by SEA & LEA

ESEA/ESSA Sec. 8304(a)(3)(C)

### Complaints received by the SEA

Requirements are further explained in the [Federal Programs Handbook – Information Applicable to All Federal Programs](#) and cover:

- Grounds for Complaint
- Filing a Complaint
- Investigation of a Complaint
- Right of Appeal

### Complaints received by the LEA

It is strongly encouraged that LEAs develop and adhere to procedures for receiving and resolving complaints alleging violations of law in the administration of covered programs that originate at the local level. A complaint should not be filed with the GaDOE until every effort has been made to resolve the issue through local written complaint procedures. If the complainant has tried to file a complaint at the local level to no avail, the complainant should contact the GaDOE.

## APPENDIX

### A. SAMPLE Title II, Part A Coordinator Calendar

MARCH - JUNE	<ul style="list-style-type: none"> <li>• CLIP (Consolidated LEA Implementation Plan) (Opens March – Due July 31)                             <ul style="list-style-type: none"> <li>○ Ensure access to GaDOE portal</li> <li>○ CNA (Comprehensive Needs Assessment)</li> <li>○ DIP (District Improvement Plan)</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Monitoring Title II, Part A Program for Effectiveness                             <ul style="list-style-type: none"> <li>○ Collect data and analyze</li> <li>○ If Applicable, submit Corrective Action Plan (CAP) from GaDOE Monitoring</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Financial Records Review and Reconciliation                             <ul style="list-style-type: none"> <li>○ Current FY Title II, Part A Expenditure Detail Report</li> <li>○ Current FY Title II, Part A Budget</li> <li>○ Current FY Title II, Part A Drawdowns</li> <li>○ Current FY Time and Effort Documentation (PAR/Time logs)</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Training                             <ul style="list-style-type: none"> <li>○ If applicable, Federal Programs Conference (June)</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Private Schools                             <ul style="list-style-type: none"> <li>○ Ongoing Consultation</li> <li>○ ES4PS Form A due June 30 in SLDS</li> </ul> </li> </ul>
JULY -SEPTEMBER	<ul style="list-style-type: none"> <li>• CLIP Due July 31 (Subject to change as needed)</li> </ul>
	<ul style="list-style-type: none"> <li>• Program Administration                             <ul style="list-style-type: none"> <li>○ Review Guidance                                     <ul style="list-style-type: none"> <li>▪ Federal Law, Federal Regulation, Federal Non-Regulatory Guidance</li> <li>▪ State Guidance – Federal Programs and Title II, Part A</li> </ul> </li> <li>○ Review and Clearly Communicate Existing LEA Internal Controls                                     <ul style="list-style-type: none"> <li>▪ Fiscal and Programmatic</li> </ul> </li> <li>○ GaDOE High Risk Notification (August)</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Budget Preparation and Submission (Budget due October 1)                             <ul style="list-style-type: none"> <li>○ Current FY Title II, Part A Budget &amp; Data Collection Forms</li> <li>○ Supporting Attachments: Equitable Services, Prioritization of Funds, Job Descriptions, Class Size Reduction, Consolidation of Funds Required Documents</li> <li>○ Training by both Federal Programs and Title II, Part A (August)</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Monitoring Title II, Part A Program for Implementation &amp; Effectiveness                             <ul style="list-style-type: none"> <li>○ GaDOE Monitoring                                     <ul style="list-style-type: none"> <li>▪ Based on published 4 yr. Cycle – Notifications sent in August</li> <li>▪ Training by both Federal Programs and Title II, Part A (August)</li> </ul> </li> <li>○ Collect data and analyze</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Financial Records Review and Reconciliation                             <ul style="list-style-type: none"> <li>○ Current FY Title II, Part A Expenditure Detail Report</li> <li>○ Current FY Title II, Part A Budget</li> <li>○ Current FY Title II, Part A Drawdowns</li> <li>○ Current FY Time and Effort Documentation (PAR/Time logs)</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Private Schools                             <ul style="list-style-type: none"> <li>○ Provide equitable services to participating private schools</li> </ul> </li> </ul>

<b>OCTOBER</b>	<ul style="list-style-type: none"> <li>• Budget Due October 1               <ul style="list-style-type: none"> <li>○ Covers 15 months: July 1-September 30</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Financial Records Review, Reconciliation, and Supporting Documentation               <ul style="list-style-type: none"> <li>○ LEA Finance Department submits previous FY Title II, Part A Completion Report (Due October 30)</li> <li>○ Maintain documentation to support the previous FY Title II, Part A Completion Report</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Private Schools               <ul style="list-style-type: none"> <li>○ Ongoing Consultation for Current FY</li> <li>○ ES4PS Invitation sent through SLDS to Participate in Equitable Services for Next FY                   <ul style="list-style-type: none"> <li>▪ All private schools in the geographic boundaries of the LEA</li> <li>▪ Verify current documentation for participating private schools' non-profit status</li> </ul> </li> <li>○ Submit ES4PS Form B in SLDS through LEA's SIS to ensure prior year's services were equitable</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Monitoring Title II, Part A Program for Implementation &amp; Effectiveness               <ul style="list-style-type: none"> <li>○ GaDOE Monitoring (Scheduled January – May)</li> <li>○ Collect data and begin analysis and summaries for current fiscal year</li> </ul> </li> </ul>

<b>NOVEMBER- FEBRUARY</b>	<ul style="list-style-type: none"> <li>• Financial Records Review, Reconciliation, and Supporting Documentation               <ul style="list-style-type: none"> <li>○ Current FY Title II, Part A Expenditure Detail Report</li> <li>○ Current FY Title II, Part A Budget</li> <li>○ Current FY Title II, Part A Drawdowns</li> <li>○ Current FY Time and Effort Documentation (PAR/Time logs)</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Budget               <ul style="list-style-type: none"> <li>○ Submit Budget Amendment for carryover and allocation adjustments</li> </ul> </li> </ul>
	<ul style="list-style-type: none"> <li>• Monitoring Title II, Part A Program for Implementation &amp; Effectiveness               <ul style="list-style-type: none"> <li>○ GaDOE Monitoring (Scheduled January – May)</li> <li>○ Collect data and begin analysis and summaries</li> </ul> </li> </ul>



## B. OPTIONAL Title II, Part A Guiding Questions for Needs Assessment

### Georgia's Systems of Continuous Improvement

#### Coherent Instructional System

The major system of the complex school organization that articulates and guides the “what” and “how” of instruction.

1. **Planning for quality instruction** – the structure of the instructional system in which teams plan what the students should know and do, and determine how their students will show they “know” the content and can “do” a skill or performance task
2. **Delivering quality instruction** - the structure of the instructional system that guides teachers in how they introduce content, practice its use along with the students, and then allow students to use the content on their own while providing students regular standards-based feedback to gain mastery of the content
  - *Have all teachers been provided professional development in how to differentiate instruction, adapt content and utilize digital tools and resources to create personalized learning opportunities to meet the diverse needs of all?*
  - *What evidence exists that the LEA has a balanced assessment system aligned to the district/state curricula which includes formative, interim and summative measures that are rigorous and cognitively demanding?*
3. **Monitoring student progress** – the structure of the instructional system that methodically discovers if the students are getting the content, and what to do about it when they are getting it or are not getting it
  - *What evidence is there that students are engaged in learning?*
  - *What evidence exists that innovative practices are accompanied by data to support student achievement?*
  - *How does the LEA ensure that evidence-based instructional resources, strategies and programs are coordinated and monitored for progress in closing the achievement and equity gaps?*
4. **Refining the instructional system** – the structure of the instructional system that examines how to improve the planning for quality instruction, delivering quality instruction, and monitoring progress

#### Effective Leadership System

A major system of the complex school organization that sets the direction for the school, ensures that the school's staff is capable of meeting that direction, and makes sure the organization functions according to its mission.

5. **Creating and maintaining a climate and culture conducive to learning** – the structure of the leadership system that ensures that the school allows both adults and children to put learning at the center of their daily activities.
  - *What evidence exists that the learning environment is one where each student, educator, and staff member feels accepted, respected, and able to contribute to the learning community in meaningful ways?*
  - *What evidence exists that the learning environment is one in which each student is known, accepted and valued, trusted and respected, cared for, and encouraged to be an active and responsible member of the learning community?*
  - *Which areas do LEA climate survey results indicate as strengths and weakness?*
  - *What other LEA data reveals additional information about the current climate among school personnel? For example: What is the LEA's staff attendance rate by job group and location?*
  - *What other internal or external factors might have affected district or school data and/ or results of district/ or school data?*

- *Internal: resource allocation, documentation and monitoring, technology and software, communication, internal controls, personnel assignment/ performance*
  - *External: geographic location, population demographics (employment, education, median income), local/ state/ national economy, natural disasters, state and federal policy changes*
  - *What professional development addressing content, pedagogy, and supports and interventions do leaders need?*
6. **Cultivating and distributing leadership** – the structure of the leadership system that develops others to accomplish the group’s purpose and encourages the development of leadership across the organization
- *What are the professional development needs of school personnel relative to advancement and leadership opportunities (pay differentiation, multiple career paths)?*
  - *Does the LEA promote growth and multiple career paths, such as instructional coaching and mentoring (including hybrid roles that allow instructional coaching and mentoring while remaining in the classroom), school leadership and involvement with school improvement and support?*
  - *Are any of the career advancement professional development opportunities offered in alignment with recommended practices addressed in ESSA, such as teacher and school leader residency programs and/ or teachers, principal or other school leader preparation academies?*
7. **Ensuring high quality instruction in all classrooms** – the structure of the leadership system that reduces the variability in the quality of instruction across all classrooms
- *What policies and procedures are in place to ensure that all teachers possess the appropriate professional qualifications for the subject/course and grade level in which assigned?*
  - *What do teacher and leader evaluations, self-assessments, observations and supporting documentation reveal as strengths and weaknesses? Is corresponding professional development currently being offered? If so, to what extent is it personalized and monitored for growth?*
  - *Has the LEA established performance goals and objectives for teachers and leaders at the district level, school level and/ or specific grades or content areas? If so, is progress being monitored? Is the effectiveness of activities being measured?*
  - *If the LEA employs struggling teachers, how many, in which schools, grades and/ or content areas? What supports does the LEA provide? How does the LEA ensure struggling teacher performance is improving? How does the LEA use the results of teacher and leader evaluations to support retention decisions?*
  - *Are highly effective and experienced teachers and leaders equitably distributed across schools? Are highly effective and experienced teachers equitably distributed across school content courses and grade levels?*
  - *What evidence exists that methods are employed to capitalize on educators’ strengths and qualifications, such as*
    - *Assigning highly effective educators to students most in need?*
    - *Pairing new teachers with other effective teachers?*
    - *Providing opportunities for teachers across disciplines to collaborate?*
8. **Managing the school and its resources** – the structure of the leadership system that ensures leaders effectively use all the resources at hand so that the school functions according to its mission
- *Does the LEA have a clear and collaborative process for reviewing operations and programs to achieve efficiencies through coordination of federal, state and local resources in an effort to make more effective use of resources to support student achievement?*
  - *What evidence exists that the LEA builds capacity of staff to develop and implement meaningful two-way communication efforts with families and the community that leverage diverse perspectives, identifies key messages for all audiences, use multiple communication mediums and timelines, and effectively engages all learning community members?*
9. **Driving improvement efforts** – the structure of the leadership systems that methodically, intentionally, and effectively improves the schools’ major systems, structures, and processes

- *Which stakeholders can help identify local needs and/or root causes? How can they be engaged early and in a meaningful way throughout the process?*
- *What data are needed to best understand local needs and/or root causes?*
- *Does the LEA systematically monitor the implementation of district and school level plans and progress on a regular basis, providing feedback, and following-up with appropriate staff?*
- *What are the professional development needs of leaders (principals, assistant principals and other school instructional leaders including coaches, mentors and evaluators) relative to becoming and remaining effective leaders in their current leadership positions?*
- *What evidence exists that the LEA develops the capacity of staff to assess the value and applicability of emerging educational trends and research findings for the learning community and its improvement?*

## Professional Capacity System

A major system of the complex school organization that develops a quality staff to reduce the variance of quality in instruction throughout the school

10. **Attracting staff** – the structure of the professional capacity system that is intentional in locating the teachers and leaders that are the best fit for the school to achieve its mission

- *Which stakeholders can help identify local needs and/or root causes for attracting staff? How can they be engaged early and in a meaningful way throughout the process? What data are needed to best understand local needs and/or root causes?*
- *What are your LEA's recruitment needs? Do you have vacancies? In which schools, grade levels, content areas? Have you analyzed recruitment data by content course, grade level, schools, staff demographics (minority, experience), and student needs (EL, Gifted, SWD)? Which content courses, grade levels or schools are difficult to staff? Why? Is there an area in which targeted recruitment could increase teacher effectiveness or experience? Is there an area in which targeted recruitment could increase student achievement?*
- *What are the LEAs current recruitment activities? Does the LEA recruit qualified individuals from other fields to become teachers, principals, or other school leaders, including mid-career professionals from other occupations, former military personnel, and recent graduates of institutions of higher education with records of academic distinction who demonstrate potential to become effective teachers, principals, or other school leaders?*
- *What evidence exists that effective and caring teachers and other professional staff are recruited who exhibit a willingness to be active contributors to the personalized, learner-centered classroom?*
- *What is the effectiveness of LEA's current recruitment activities? How many new candidates were hired as a result of job fairs, student teaching, or advertising, etc.?*
- *Do teachers need to be recruited to address any inequities in teacher effectiveness?*
- *What evidence exists that highly competent personnel are recruited who use technology creatively and proficiently to advance academic and operational goals?*
- *Are effective policies and procedures in place to hire, maintain, and support staff diversity?*
- *Are effective policies and procedures in place that guide the screening of candidates and enable early hiring? Are the appropriate LEA personnel adequately trained in the process of screening candidates?*
- *Can all teachers and paraprofessionals document professional qualifications for their current assignments? If a teacher cannot document professional qualifications for the teacher's current assignment, could recruitment needs be met through reassignment? Is testing or additional coursework required by the LEA? Does the LEA have teachers with provisional or emergency certification? Do qualification challenges occur at higher rates at certain schools or in schools serving certain populations or in certain content courses or grade levels? If so, why?*

11. **Developing staff** - the structure of the professional capacity system that ensures the increasing quality of the staff's knowledge and skills

- *Are you required to meet any professional development directives (LEA, State, Federal)? For example, does the LEA have any schools designated for comprehensive or targeted support?*
- *Is professional development in the LEA personalized, evidenced-based, and focused on improving teaching and student learning and achievement?*
- *In your LEA, what are the most effective methods for delivering professional development (Job-Embedded, Professional Learning Communities (PLCs), Online Modules, Consultants, Train the Trainer)? Does the effectiveness of the delivery depend on the topic?*
- *How is the LEA monitoring and measuring effectiveness of the current professional development? Can the results of the professional development provided be tied to student achievement results? In reviewing results, should the LEA make any changes in its current practices in monitoring and measuring effectiveness of professional development?*
- *What are the professional development needs of teachers relative to content and pedagogy?*
- *Does the LEA currently, provide evidence-based professional development in the following areas addressed in ESSA?*
  - *Integrating technology into curricula and instruction*
  - *Using data to improve student achievement*
  - *Developing, selecting and implementing assessments to support student learning (formative, summative, classroom-based, assessment data analysis)*
  - *Promoting high-quality instruction and instructional leadership in science, technology, engineering, and mathematics subjects, including computer science*
  - *Improving instructional strategies of teachers to integrate career and technical education content into academic instructional practices*
  - *Identifying best practices to support State and regional workforce needs and transitions to post-secondary education and workforce*
- *What programs and activities does the LEA provide to increase the knowledge base of teachers, principals, or other school leaders on instruction in the early grades? On strategies to measure whether young children are progressing?*
- *What programs and activities does the LEA provide to increase the ability of principals and other school leaders to support teachers, teacher leaders, early childhood educators and other professionals to meet the needs of students through age 8? Are professional development and planning activities for school staff and educators in preschool programs that address the transition to elementary school?*

12. **Retaining staff** – the structure of the professional capacity system that ensures the quality staff is working in the context/position that is most beneficial to student achievement

- *What is the LEA's current retention/ attrition rate? How does this compare over time (past 3 years)? Have you analyzed retention data by content courses, grade levels, schools, staff and student demographics? Are there particular areas in which it is difficult to retain teachers? Does the LEA have the same high needs areas (special education, Spanish) as the State?*
- *Does the LEA require exit surveys to determine the causes for personnel (teachers, principals and other school leaders) attrition? If so, are there any areas of concern?*
- *How does the LEA plan for and manage staff turnover and succession in order to maintain a learner-center environment via opportunities for effective hiring, induction, and mentoring of new personnel?*
- *Does the LEA have a plan for supporting teachers, principals and other school leaders through the use of induction and mentoring programs? Does the plan provide adequate support for new teachers or principals, struggling veteran teachers or leaders, or teachers serving special needs students?*
- *How effective are the LEA's current retention strategies? How do you know?*
- *What evidence exists that highly competent personnel are retained who use technology creatively and proficiently to advance academic and operational goals?*

- *What evidence exists that effective and caring teachers and other professional staff are retained who exhibit a willingness to be active contributors to the personalized, learner-centered classroom?*

13. **Ensuring staff collaboration** - the structure of the professional capacity system that reinforces the effective practice of constant collaboration to improve instructional quality in all classrooms
- *How does the LEA ensure time and support for collaboration among teachers and their ability to pursue their passion, interests, and personal development in service of improving learning and learning conditions?*
  - *How does the LEA facilitate and connect staff to learning communities and experiences that stimulate, nurture, and support their ability to develop their own understanding and lead others in the personalized learning approach?*

## Family & Community Engagement

A major system of the complex school organization that develops quality links between local school professionals and the parents and community the school is intended to serve

14. **Welcoming all families/the community** – the structure of the family & community engagement system that ensures families and the community are active participants within the school, and feel welcomed, valued, and connected to each other, to school staff, and to what students are learning and doing in school
- *Does the LEA have policies and practices that may present unintentional barriers to fully engaging family members in their child's education?*
15. **Communicating effectively with families/the community** - the structure of the family & community engagement system that ensures families/community and school staff engage in regular, two-way, meaningful communication about student learning
- *Does the LEA have policies and procedures that facilitate communication with families where staff implement and monitor frequent two-way communication with families regarding learning standards, their children's progress toward meeting those standards, K-12 instructional and extra-curricular options and the families' role in their children's success in school including preparation for post-secondary education and careers?*
16. **Supporting student success** – the structure of the family & community system that ensures families and school staff continuously collaborate to support students' learning and healthy development both at home and at school, and have regular opportunities to strengthen their knowledge and skills to do so effectively
- *Which stakeholders can help identify local needs and/or root causes? How can they be engaged early and in a meaningful way throughout the process? What data are needed to best understand local needs and/or root causes?*
  - *How are students supported through periods of transition such as moving from one school or program to another? Are there established transfer practices which the LEA implements that include communication between staff at feeder and receiver schools at all levels? (Transition Examples: Foster Care, Alternative Programs, Migrant, Military, Post-Secondary, Career)*
  - *What are the professional development needs of participating private school leaders and teachers relative to student support and interventions?*
  - *What are the professional development needs of participating private school teachers relative to content and pedagogy? How is this determined?*
  - *What are the professional development needs of participating private school leaders relative to becoming and remaining effective leaders in their current leadership positions? How is this determined?*

17. **Empowering families** – the structure of the family & community engagement system that ensures families are empowered to be advocates for their own and other children, to ensure that students are treated fairly and have access to learning opportunities that will support their success
- *How are families encouraged to be active in the education of their child(ren) such as involvement in meetings regarding services to and progress for individual students?*
  - *What systems are in place to support schools' activities and processes to educate families on opportunities to be involved in the school and at home to support student learning?*
  - *What LEA policies are in place that establish clear lines of communication and dispute management procedures, ensuring that families are comfortable advocating for their child and communicating their needs to school staff?*
18. **Sharing leadership with families/the community** - the structure of the family & community engagement system that ensures families/the community and school staff are equal partners in decisions that affect children and families and together inform, influence, and create policies, practices, and programs
- *What types of processes are in place to implement an effective communication and decision-making system that involves families, students, teachers, school employees and community in data-driven decision making for determining goals, creating policy, reviewing budgets, evaluating school reform initiatives, and in creating safe learning environments?*
  - *What evidence is there that relationships with parents and community are improving?*
19. **Collaborating with the community** - the structure of the family & community engagement system that ensures families and school staff collaborate with community members to connect students, families, and staff to expanded learning opportunities, community services, and civic participation
- *Do school personnel require professional development on effectively engaging parents, families and community partners and coordinating services between school and community?*
  - *Are there LEA policies and procedures in place that address creating connections between schools and the broader community to support student learning and career related learning opportunities?*
  - *To ensure kindergarten readiness, what types of training and collaborative planning does the LEA provide for teachers and paraprofessionals in the preschool programs to set appropriate goals for potential students? How does the LEA measure the effectiveness of each of these programs to ensure content and practices at the preschools are achieving the desired outcome of delivering students to the school ready to learn and participate effectively in the classroom?*

## Supportive Learning Environment

A major system of the complex school organization that ensures students' school participation and willingness to expend major effort on classroom learning

20. **Maintaining order and safety** – the structure of the supportive learning environment system that ensures that the basic needs of orderliness and safety are met
- *Do school personnel require professional development in classroom management strategies that are effective in meeting the needs of diverse student learners?*
21. **Developing and monitoring a multi-tiered system of supports** – the structure of the supportive learning environment system that provides comprehensive services to students to meet their unique, whole child needs
- *Do school personnel require professional development on the culture and economics of students the school is serving?*
  - *Do all classes across elementary schools and within school grade levels have equivalent class sizes? Do all courses have equivalent class sizes within individual middle and high schools and across your LEA?*

- *Based on student achievement data, have you identified specific student cohorts or content areas that would benefit from evidence-based reduced class size?*
- *What instructional services are currently provided by school library programs? Is the service effectively supporting student achievement? In which areas could the instructional services be improved in order to promote student achievement?*
- *What supporting opportunities are available for principals, other school leaders, teachers, paraprofessionals, early childhood education program directors, and other early childhood education providers to participate in joint efforts to address the transition to elementary school, including issues of school readiness?*
- *Does the LEA have programs and activities that increase the ability of teachers to effectively teach children with disabilities, including children with significant cognitive disabilities, and English learners, which may include the use of multi-tier systems of support and positive behavioral intervention and supports, so that such children with disabilities and English learning can meet the challenging State academic standards?*
- *Do school personnel have the training and resources to meet the diverse needs of student learners? (ESOL, Exceptional Education, Gifted, Rtl, etc.) Is professional development provided to ensure teachers' depth of understanding in the implementation of differentiated instruction?*
- *What comprehensive system of support does the LEA have for teachers, principals, or other school leaders to promote high-quality instruction and instructional leadership in science, technology, engineering, and mathematics subjects, including computer science?*
- *What professional development may teachers need to support students in job programs and to prepare students for post-secondary education and the workforce (CTAE/ Work-based learning, STEM, etc.)? Has the LEA solicited input from graduates, parents, business partners and institutions of higher education?*
- *Do school personnel require training to support the identification of students who are gifted and talented, including high ability students who have not been formally identified for gifted education services? Do all students have access, in representative numbers, to appropriate services/ course offerings such as gifted, IB, and AP? Do school personnel require training for implementing instructional practices that support the education of these students?*

**22. Ensuring a student learning community** – the structure of the supportive learning environment system that ensures compliance with positive and healthy behavioral and academic norms

- *Does the LEA currently have policies that encourage teachers to value the cultural differences among the students and families served by the district?*
- *What evidence is there that increasingly positive school relationships result in increased student achievement?*
- *Does the LEA currently provide effective in-service training to school personnel in the following areas addressed in ESSA?*
  - *Techniques and supports for student referral for effectively linking children to appropriate treatment and intervention services in the school and community (trauma, mental illness, etc.)*
  - *Forming partnerships between internal and external mental health programs/ organizations*
  - *Addressing issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse and chronic absenteeism*
  - *Preventing and recognizing child sexual abuse*
  - *Ensuring individual student privacy is protected (FERPA)*

## C. ESSA Title II, Part A LEA Local Use of Funds

### Authorized Use of Funds (A)

- (A) Developing or improving a rigorous, transparent, and fair evaluation and support system for teachers, principals, or other school leaders that
- (i) is based in part on evidence of student achievement, which may include student growth; and
  - (ii) shall include multiple measures of educator performance and provide clear, timely, and useful feedback to teachers, principals, or other school leaders.

### Authorized Use of Funds (B)

- (B) Developing and implementing initiatives to assist in recruiting, hiring, and retaining effective teachers, particularly in low-income schools with high percentages of ineffective teachers and high percentages of students who do not meet the challenging State academic standards, to improve within district equity in the distribution of teachers, consistent with section 1111(g)(1)(B), such as initiatives that provide
- (i) expert help in screening candidates and enabling early hiring
  - (ii) differential and incentive pay for teachers, principals, or other school leaders in high-need academic subject areas and specialty areas, which may include performance-based pay systems
  - (iii) teacher, paraprofessional, principal, or other school leader advancement and professional growth, and an emphasis on leadership opportunities, multiple career paths, and pay differentiation
  - (iv) new teacher, principal, or other school leader induction and mentoring programs that are designed to
    - (I) improve classroom instruction and student learning and achievement; and
    - (II) increase the retention of effective teachers, principals, or other school leaders
  - (v) the development and provision of training for school leaders, coaches, mentors, and evaluators on how accurately to differentiate performance, provide useful feedback, and use evaluation results to inform decision making about professional development, improvement strategies, and personnel decisions; and
  - (vi) a system for auditing the quality of evaluation and support systems.

### Authorized Use of Funds (C)

- (C) Recruiting qualified individuals from other fields to become teachers, principals, or other school leaders, including mid-career professionals from other occupations, former military personnel, and recent graduates of institutions of higher education with records of academic distinction who demonstrate potential to become effective teachers, principals, or other school leaders.

### Authorized Use of Funds (D)

- (D) Reducing class size to a level that is evidence based, to the extent the State (in consultation with local educational agencies in the State) determines that such evidence is reasonably available, to improve student achievement through the recruiting and hiring of additional effective teachers.

### Authorized Use of Funds (E)

- (E) Providing high-quality, personalized professional development that is evidence-based, to the extent the State (in consultation with local educational agencies in the State) determines that such evidence is reasonably available, for teachers, instructional leadership teams, principals, or other school leaders, that is focused on improving teaching and student learning and achievement, including supporting efforts to train teachers, principals, or other school leaders to
- (i) effectively integrate technology into curricula and instruction (including education about the harms of copyright piracy);
  - (ii) use data to improve student achievement and understand how to ensure individual student privacy is protected, as required under section 444 of the General Education Provisions Act (commonly known as the "Family Educational Rights and Privacy Act of 1974") (20 U.S.C. 1232g) and State and local policies and laws in the use of such data;
  - (iii) effectively engage parents, families, and community partners, and coordinate services between school and community;
  - (iv) help all students develop the skills essential for learning readiness and academic success;
  - (v) develop policy with school, local educational agency, community, or State leaders; and
  - (vi) participate in opportunities for experiential learning through observation.



**Authorized Use of Funds (F)**

(F) Developing programs and activities that increase the ability of teachers to effectively teach children with disabilities, including children with significant cognitive disabilities, and English learners, which may include the use of multi-tier systems of support and positive behavioral intervention and supports, so that such children with disabilities and English learners can meet the challenging State academic standards

**Authorized Use of Funds (G)**

(G) Providing programs and activities to increase

- (i) the knowledge base of teachers, principals, or other school leaders on instruction in the early grades and on strategies to measure whether young children are progressing; and
- (ii) the ability of principals or other school leaders to support teachers, teacher leaders, early childhood educators, and other professionals to meet the needs of students through age 8, which may include providing joint professional learning and planning activities for school staff and educators in preschool programs that address the transition to elementary school.

**Authorized Use of Funds (H)**

(H) Providing training, technical assistance, and capacity-building in local educational agencies to assist teachers, principals, or other school leaders with selecting and implementing formative assessments, designing classroom-based assessments, and using data from such assessments to improve instruction and student academic achievement, which may include providing additional time for teachers to review student data and respond, as appropriate.

**Authorized Use of Funds (I)**

(I) Carrying out in-service training for school personnel in

- (i) the techniques and supports needed to help educators understand when and how to refer students affected by trauma, and children with, or at risk of, mental illness;
- (ii) the use of referral mechanisms that effectively link such children to appropriate treatment and intervention services in the school and in the community, where appropriate;
- (iii) forming partnerships between school-based mental health programs and public or private mental health organizations; and
- (iv) addressing issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism

**Authorized Use of Funds (J)**

(J) Providing training to support the identification of students who are gifted and talented, including high-ability students who have not been formally identified for gifted education services, and implementing instructional practices that support the education of such students, such as

- (i) early entrance to kindergarten;
- (ii) enrichment, acceleration, and curriculum compacting activities; and
- (iii) dual or concurrent enrollment programs in secondary school and postsecondary education.

**Authorized Use of Funds (K)**

(K) Supporting the instructional services provided by effective school library programs.

**Authorized Use of Funds (L)**

(L) Providing training for all school personnel, including teachers, principals, other school leaders, specialized instructional support personnel, and paraprofessionals, regarding how to prevent and recognize child sexual abuse.

**Authorized Use of Funds (M)**

(M) Developing and providing professional development and other comprehensive systems of support for teachers, principals, or other school leaders to promote high-quality instruction and instructional leadership in science, technology, engineering, and mathematics subjects, including computer science.

**Authorized Use of Funds (N)**

(N) Developing feedback mechanisms to improve school working conditions, including through periodically and publicly reporting results of educator support and working conditions feedback

**Authorized Use of Funds (O)**

(O) Providing high-quality professional development for teachers, principals, or other school leaders on effective strategies to integrate rigorous academic content, career and technical education, and work-based learning (if appropriate), which may include providing common planning time, to help prepare students for postsecondary education and the workforce

**Authorized Use of Funds (P)**

(P) Carrying out other activities that are evidence-based, to the extent the State (in consultation with local educational agencies in the State) determines that such evidence is reasonably available, and identified by the local educational agency that meet the purpose of this title

## D. Title II, Part A Function and Object Codes Quick Guide

Most Common Used Title II, Part A Function and Object Code Combinations; Not an All-Inclusive List

Title II, Part A		Fund Code – 414	Program Code - 1784
Function	Object	Application of LUA in Title II, Part A	
1000 Instruction	110	Class Size Reduction Teacher (CSR) - ESSA Sec. 2103 Local Uses of Funds (D)	
	113	Substitute for Class Size Reduction Teacher	
	199	Teacher Recruitment/ Retention Incentive - ESSA Sec. 2103 Local Uses of Funds (B)(C)	
	200 - 290	CSR Benefits: Employee Benefits (200), State Health Insurance (210), FICA (220), Teachers Retirement System (230), Unemployment (250), Workman's Compensation (260), Benefit in Lieu of Soc. Sec. (280), Other Employee Benefits (290)	
	300	Contracted Services for CSR Teacher; Contracted Services for Substitute for CSR Teacher	
	595	Other Purchased Services (Consult Title II, Part A Specialist) for Recruitment and Retention Incentives - ESSA Sec. 2103 Local Uses of Funds (B)(C)	
	881	Transfer to Schoolwide Budget (Fund 400) or Schoolwide Consolidation (Fund 150)	
	2213 Instructional Staff Training	113	Substitute (Temporary Employee) for Teacher Participating in Allowable PD Activities
114		Substitute (Temporary Employee) for Paraprofessional Related to Allowable PD Activities	
116		Professional Development Stipend for Instructional Staff Attending PD Beyond Contract	
190		Salary for Instructional Leader Providing PD to Instructional Staff- not students (Ex: PD Supervisory Position)	
191		Salary for Instructional Leader Providing PD to Instructional Staff -not students (Ex: Instructional Coaches)	
199		Compensation for Instructional Staff Providing PD Beyond Contract to Instructional Staff; Compensation for Capacity Building of Title II, Part A Allowable Staff through Increased Leadership Roles/Responsibilities	
200 - 290		Benefits for Instructional Staff Receiving or Providing PD: Employee Benefits (200), State Health Insurance (210), FICA (220), Teachers Retirement System (230), Unemployment (250), Workman's Compensation (260), Benefit in Lieu of Soc. Sec. (280), Other Employee Benefits (290)	
300		Contracted Services for PD for Instructional Staff: Outside Consultants; Contracted Subs for Instruct. Staff	
361- 362		Per Diem for Consultants Providing PD Services to Instructional Staff 362 - May be used for reimbursing travel expenses for Private School Teachers/Principals (non-employees)	
441		Professional Development Room Rental	
442		Professional Development Equipment Rental	
443		Professional Development Technology Rental	
532		Annual or Short-Term Software Licensing or Subscriptions for Instructional Staff	
580		PD - Travel for Instructional Staff Attending PD Training Outside LEA (Use Object 890 for Private Schools)	
595		Other Purchased Services (Consult Title II, Part A Specialist) May be used for purchasing registration for Private School Teachers/Principals (non-employees)	
610		Supplies for Current Year PD Training Activities for Instructional Staff	
611		Technology Supplies Used with Hardware/ Software for PD for Instructional Staff (flash drives, e-readers)	
612		Software Purchased by District for PD Training for Instructional Staff ( <i>may be subject to proration</i> )	
615		Expendable Equipment for PD Training for Instructional Staff (Projector) ( <i>may be subject to proration</i> )	
616		Expendable Computers (Laptops, Tablets) Equipment for PD training (<\$5,000) ( <i>may be subject to proration</i> )	
642		Books for PD Training for Instructional Staff	
810		Registration for Instructional Staff for Allowable PD Activities; Allowable PD Dues/ Fees; GACE if Supplemental	
890		Reimbursement for College Courses for PD for Instructional Staff; Reimbursement for Private School Travel	
Other	Please contact your assigned Title II, Part A Specialist		

Title II, Part A		Fund Code – 414	Program Code - 1784
Function	Object	Application of LUA in Title II, Part A	
2230 Federal Grant Administration	142	Clerical Support Related to Program Administration	
	190	Salary Title II, Part A Program Coordinator/ Director (Supervisory) <i>(May be subject to proration)</i>	
	200 - 290	Program Administration Benefits: Employee Benefits (200), State Health Insurance (210), FICA (220), Teachers Retirement System (230), Unemployment (250), Workman's Compensation (260), Benefit in Lieu of Soc. Sec. (280), Other Employee Benefits (290)	
	300	Contracted Services in Direct Support of Grant Administration	
	530	Private Schools Equitable Services Notification	
	532	Annual or Short-Term Software Licensing or Subscriptions (if not eligible for capitalization)	
	580	Travel for Title II, Part A Program Staff to Training Related to Program Administration	
	610	Supplies for Administering Program in Current Year	
	611	Supplies for Administering Program – Technology Related	
	612	Software for Tracking Allowable Professional Development <i>(must be prorated)</i>	
	615	Expendable Equipment for Administering Program <i>(must be prorated)</i>	
	616	Expendable Computer (Laptops, Tablets) Equipment for Administering Program <i>(unless used strictly for a full-time program director/ coordinator, item must be prorated)</i>	
	642	Books for Title II, Part A Administration (EDGAR)	
	810	Dues and Fees for Registration for Training Related to Program Administration	
882	Federal <b>Administrative</b> Consolidation Program – Federal Funds only. Must have a zero balance.		
2300 Gen. Admin.	300	Audit Costs	
	880	Federal Indirect Costs	
2400 School Admin.	199	Recruitment/ Retention Financial Incentives for Principals or Assistant Principals - ESSA Sec. 2103 Local Uses of Funds (B)	
	200 - 290	Incentive Benefits: Employee Benefits (200), State Health Insurance (210), FICA (220), Teachers Retirement System (230), Unemployment (250), Workman's Compensation (260), Benefit in Lieu of Soc. Sec. (280), Other Employee Benefits (290)	
2800 Support Services - Central	190	Salary Administrative Personnel for Supplemental Recruiting	
	191	Salary Management Personnel for Supplemental Recruiting - ESSA Sec. 2103 Local Uses of Funds (B)(C)	
	200 - 290	HR Benefits for Supplemental Recruiting: Employee Benefits (200), State Health Insurance (210), FICA (220), Teachers Retirement System (230), Unemployment (250), Workman's Compensation (260), Benefit in Lieu of Soc. Sec. (280), Other Employee Benefits (290)	
	300	Outside Consultant for Supplemental Recruiting	
	530	Communication for Supplemental Recruitment	
	532	Annual or Short-Term Software Licensing/ Subscriptions for Supplemental Recruitment <i>(if not eligible for capitalization)</i>	
	580	Travel for Supplemental Recruitment	
	610	Supplies for Supplemental Recruitment <i>(must be specific to recruitment – not promotion of LEA)</i>	
	612	Software Purchased by District for Recruitment <i>(must be prorated in accordance with allowability)</i>	
	616	Expendable Comp. (Laptops, Tablets) Equipment for Supplemental Recruitment <i>(may be subject to proration)</i>	
810	Registration for recruitment fairs for Supplemental Recruiting		
5000 Other Outlays	930	Transfer of Funds from Title II, Part A to Another Federal Program	
<ul style="list-style-type: none"> <li>When budgeting for Private Schools, create line items with descriptions specifically for private schools in the areas designated in the private school budget.</li> </ul>			

Title II, Part A		Fund Code – 414	Program Code - 1784
Function	Object	Application of LUA in Title II, Part A	
<ul style="list-style-type: none"> <li><i>If you have questions about allowable Title II, Part A function and object code combinations, please contact your Title II, Part A Specialist.</i></li> </ul>			

# E. SAMPLE LEA Allowability Documentation

## Planning for Title II-A Funded Activities & Strategies

*Adapted from Sample Provided by Crisp County School District*

Date(s) of PD Activity: \_\_\_\_\_ Date Requested: \_\_\_\_\_ Date Received: \_\_\_\_\_

### Title II-A Essential Questions for Determining Allowability of Expenditures

**1. Does this request fit into the Title II, Part A PD definition (refer to ESSA Title II-A Local Use of Funds)?**

Yes  No

**2. Does the activity/strategy meet the purpose of Title II, Part A? [ESSA Sec. 2001]**

- (1) increase student achievement consistent with the challenging State academic standards;
- (2) improve the quality and effectiveness of teachers, principals, and other school leaders;
- (3) increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and
- (4) provide low-income and minority students greater access to effective teachers, principals, and other school leaders.

**3. How is the activity/strategy aligned to the District Comprehensive Needs Assessment and District Improvement Plan? [ESSA Sec. 2102]**

**DIP Goal #1:** Increase % of student learners scoring Proficient or Distinguished on the GA Milestones ELA assessment by 3%

**DIP Goal #2:** Increase % of student learners scoring Proficient or Distinguished on the GA Milestones mathematics assessment by 3%

**Equity Gap #1:** Student Achievement in core content, esp. ELA & mathematics

**Equity Gap #2:** Discipline: Non SWD OSS 10 days or less

**4. (a) Is the activity/strategy one of the ESSA Title II, Part A Local Use of Funds Type of Activities?**

Yes, answer (b)  No, **STOP** the PD is not allowable

**(b) Circle the Authorized Use of Funds (A-P) that applies to the PD activity (refer to ESSA Title II-A Local Use of Funds).**

A B C D E F G H I J K L M N O P

**5. Is the activity/strategy evidence-based using the Title VIII definition?**

**[ESSA Sec. 8101]? Use the following links to determine evidence-based: [ED, What Works Clearinghouse Webpage](#), [National Clearinghouse for Educational Facilities](#), and/or [Educational Resources Information Center \(ERIC\)](#)**

Yes  No

**6. If professional development, does the professional development align with the Title VIII definition? [ESSA Sec. 8101] See ESSA Local Uses of Funds**

Yes  No

**(b) Explain how the professional development activity will be sustainable (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom –focused).** \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. (a) Will the LEA be able to **determine and report** how the chosen activity/strategy improved teacher, principal or other school leader **effectiveness**?

\_\_\_Yes \_\_\_NO

Identify Effectiveness Measures: \_\_\_\_\_ & how/when it will be measured (ex. Oct. Jan, & May)? \_\_\_\_\_

Note: Academic coaches will maintain effectiveness data for all PD activities.

(b) How will the activity/ strategy be **documented**? [ESSA Sec. 2104]

*For Federal Programs' Office Use Only*

8. Is the activity/strategy **supplementing (not supplanting) non-federal funds** that would otherwise be used for activities authorized under Title II, Part A? [ESSA Sec. 2301]

\_\_\_Yes \_\_\_No

9. Does the activity/strategy comply with the Code of Federal Regulations? [2 CFR Part 200, 34 (Expenditures); CFR Part 76 (Performance Goals); and 34 CFR Part 81 (Property)]

\_\_\_Yes \_\_\_No

*\*\*Attach Professional Leave forms*

\_\_\_\_\_  
PD Requestor's Signature                      Position/Role                      Date

\_\_\_\_\_  
Title II-A Director's Signature                      Date

## F. SAMPLE Class-Size Reduction Schedule – Grade 4

Elementary School

XXXX-XXXX School Year

Teacher A	HR	SS All students 17 Reg 11 SpEd 6	Reading All students 18 Reg 10 SpEd 6 EIP 2	Reading All students 17 Reg 10 EIP 7	SS Reg 18	Lunch	SS Reg 18	Reading All students 17 Reg 10 EIP 7
Teacher B	HR	Math All students 17 Reg 11 EIP 6		Math All students 17 Reg 16 EIP 3		Lunch	Math All students 20 Reg 12 SpEd 4 EIP 4	
Teacher C	HR	Math All students 17 Reg 11 EIP 2 SpEd 4		Math All students 18 Reg 15 EIP 3		Lunch	Math All students 18 Reg 15 EIP 3	
Teacher D	HR	SS Reg 18	Reading All students 18 Reg 12 EIP 6	Reading All students 19 Reg 15 SpEd 4	SS All students 19 Reg 15 SpEd 4	Lunch	SS Reg 18	Reading All students 18 Reg 12 EIP 6
Teacher E	HR	Math All students 17 Reg 10 EIP 7		Math All students 17 Reg 9 EIP 3 SpEd 5		Lunch	Math All students 20 Reg 16 EIP 4	
Teacher F	HR	SS Reg 16	Reading All students 16 Reg 8 EIP 8	Reading All students 19 Reg 11 EIP 3 SpEd 5	SS All students 19 Reg 14 SpEd 5	Lunch	SS Reg 19	Reading All students 19 Reg 14 EIP 5
Teacher G	HR	Science All students 18 Reg 12 SpEd 6	ELA All students 18 Reg 12 SpEd 6	ELA Reg 18	Science Reg 18	Lunch	Science Reg 18	ELA Reg 18
Teacher H	HR	Science Reg 18	ELA Reg 18	Science All students 19 Reg 15 SpEd 4	ELA All students 19 Reg 15 SpEd 4	Lunch	Science Reg 18	ELA Reg 18
Teacher I	HR	Science Reg 16	ELA Reg 16	Science All students 19 Reg 14 SpEd 5	ELA All Students 19 Reg 14 SpEd 5	Lunch	Science Reg 19	ELA Reg 19

EIP Reduced Class Model – class size reduced to serve EIP students

CSR Instructional segments paid with federal funds

## G. SUGGESTED Source Documentation – Expenditures

Budget Codes	Suggested Source Documentation (If prorated, full breakdown of associated expenses)
1000 113 2213 113 Substitutes	<ul style="list-style-type: none"> <li>• Substitute Name, Date of Service</li> <li>• Documentation to Verify Attendance and Determine Allowability of Activity (Agenda, PPT, Sign-in sheets to Include Grade and Content, etc.)</li> <li>• Proof of Title II, Part A Coordinator Authorization</li> <li>• Time and Effort Documentation</li> </ul>
1000 199 Financial Incentives	<ul style="list-style-type: none"> <li>• Documentation of Teacher Recruitment/Retention Financial Incentive</li> </ul>
2100 116 2213 116 2220 116 Stipends to Attend PD	<ul style="list-style-type: none"> <li>• Documentation to Verify Attendance and Determine Allowability of Activity (Agenda, PPT, Sign-in sheets to Include Grade and Content, etc.)</li> <li>• Proof of Title II, Part A Coordinator Authorization</li> <li>• Evidence of compliance with Stipend Policy</li> <li>• Time and Effort Documentation</li> </ul>
2213 199 2100 199 2220 199 Additional Compensation to Provide PD	<ul style="list-style-type: none"> <li>• Documentation to Determine Allowability of PD Activity (Agenda, Sign-In Sheet, PPT, etc.)</li> <li>• Proof of Title II, Part A Coordinator Authorization</li> <li>• Time and Effort Documentation</li> </ul>
2213 199 Additional Compensation for Teacher or Leader Mentor	<ul style="list-style-type: none"> <li>• Documentation of Mentoring Activities (Observations, Schedule, Procedures, etc.)</li> <li>• Approved Mentor Job Description</li> <li>• Proof of Title II, Part A Coordinator Authorization</li> <li>• Time and Effort Documentation</li> </ul>
2213 199 Additional Compensation for Teacher Leader	<ul style="list-style-type: none"> <li>• Documentation of Teacher Leader for allowable Title II, Part A Responsibilities/Activities</li> <li>• Approved Teacher Leader Job Description</li> <li>• Proof of Title II, Part A Coordinator Authorization</li> <li>• Time and Effort Documentation</li> </ul>
2400 199 Financial Incentives	<ul style="list-style-type: none"> <li>• Documentation of Recruitment/Financial Incentives for Principals and Assistant Principals</li> </ul>
2213 300 Contracted/ Purchased Services	<ul style="list-style-type: none"> <li>• Detailed Purchase Order and/ or Invoice and Check</li> <li>• Contract/ Agreement with deliverables, timeline, etc.</li> <li>• Documentation of Compliance with Federal Purchasing Requirements (UAR § 200.320(b-c)) <ul style="list-style-type: none"> <li>○ Single Purchase – Aggregate cost over \$10,000 - 2 or more price/ rate quotations</li> <li>○ Single Purchase – Aggregate cost over \$250,000 - a copy of bid formal advertising or copy of competitive proposals</li> </ul> </li> <li>• A copy of any deliverables that should have been received prior to payment. This may include sign-in sheets, training materials, etc. Sign-In sheets should include staff positions/ grade/ content</li> <li>• Proof of Title II, Part A Coordinator Authorization</li> </ul>
2213 580 (PD) 2230 580 (Admin) 2800 580 (Recruit) Travel	<ul style="list-style-type: none"> <li>• Documentation of Allowability of Activity. This may include, but is not limited to: Name and Position of Attendee, Agendas, Training Materials with Sessions Attended Highlighted</li> <li>• Documentation to Verify Costs Incurred: Mileage Form, Proof of Airfare, Hotel Receipts, Transportation and Luggage Check Receipts</li> <li>• Documentation to Determine Scope of Costs was Approved Prior to Travel: Travel Authorization</li> <li>• Proof of Title II, Part A Coordinator Authorization</li> <li>• Timeline/Plan for Redelivery, if Applicable</li> </ul>
2213 610/611 Supplies	<ul style="list-style-type: none"> <li>• Detailed Purchase Order and/ or Invoice and Check</li> <li>• Associated Description to Determine Allowability</li> <li>• Proof of Title II, Part A Coordinator Authorization</li> </ul>



Budget Codes	Suggested Source Documentation (If prorated, full breakdown of associated expenses)
2213 532/612 Software	<ul style="list-style-type: none"> <li>• Detailed Purchase Order and/ or Invoice (with start and end licensing dates) and Check</li> <li>• Associated Activity/ Description to Determine Allowability</li> <li>• If prorated, a full breakdown of associated expenses</li> <li>• Documentation of Compliance with Federal Purchasing Requirements (UAR § 200.320(b-c)) <ul style="list-style-type: none"> <li>○ Single Purchase – Aggregate cost over \$10,000 - 2 or more price/ rate quotations</li> <li>○ Single Purchase – Aggregate cost over \$250,000 - a copy of bid formal advertising or copy of competitive proposals</li> </ul> </li> <li>• Proof of Title II, Part A Coordinator Authorization</li> </ul>
2213 615/616 Equipment	<ul style="list-style-type: none"> <li>• Detailed Purchase Order and/ or Invoice and Check</li> <li>• Associated Purpose/ Intended Use to Determine Allowability</li> <li>• If prorated, a full breakdown of associated expenses</li> <li>• Documentation of Compliance with Federal Purchasing Requirements (UAR § 200.320(b-c)) <ul style="list-style-type: none"> <li>○ Single Purchase – Aggregate cost over \$10,000 - 2 or more price/ rate quotations</li> <li>○ Single Purchase – Aggregate cost over \$250,000 - a copy of bid formal advertising or copy of competitive proposals</li> </ul> </li> <li>• Proof of Title II, Part A Coordinator Authorization</li> </ul>
2213 642 2230 642 Books	<ul style="list-style-type: none"> <li>• Detailed Purchase Order and/ or Invoice and Check</li> <li>• Associated Activity and Audience to Determine Allowability</li> <li>• Documentation of Compliance with Federal Purchasing Requirements (UAR § 200.320(b-c)) (UAR § 200.320(b-c)) <ul style="list-style-type: none"> <li>○ Single Purchase – Aggregate cost over \$10,000 - 2 or more price/ rate quotations</li> <li>○ Single Purchase – Aggregate cost over \$250,000 - a copy of bid formal advertising or copy of competitive proposals</li> </ul> </li> </ul>
2213 810 2800 810 Registration	<ul style="list-style-type: none"> <li>• Detailed Purchase Order and/ or Invoice and Check</li> <li>• Documentation to Determine Activity is Allowable. This may include, but is not limited to: Recipient Name and Position, Agenda, Session Descriptions, Training Materials</li> <li>• Evidence of how PL is ongoing, job embedded, etc. <ul style="list-style-type: none"> <li>○ For personnel other than teachers or leaders – evidence of training provided to teachers and/or school leaders that is ongoing, job embedded, etc.</li> </ul> </li> <li>• If prorated, a full breakdown of associated expenses</li> <li>• Proof of Title II, Part A Coordinator Authorization</li> </ul>
2800 530 Recruitment Advertising	<ul style="list-style-type: none"> <li>• Detailed Purchase Order and/ or Invoice and Check</li> <li>• Copy of the print (newspaper, journal, magazine), brochures, programs, virtual (webpage), and/ or radio (transcript) ad as proof of services rendered and allowability</li> <li>• Proof of Title II, Part A Coordinator Authorization</li> </ul>
Function/ Object Vary P-Card Purchases	<ul style="list-style-type: none"> <li>• P-Card Statement</li> <li>• Source Documentation as Listed in Categories Above</li> <li>• Proof of Title II, Part A Coordinator Authorization (p-card procedures must include program authorization)</li> </ul>
Function/ Object Vary Journal Entries	<ul style="list-style-type: none"> <li>• Proof of Journal Entry from One Fund Source to Title II, Part A</li> <li>• Source Documentation as Listed in Categories Above</li> <li>• Proof of Title II, Part A Coordinator Authorization of Transfer</li> </ul>

## H. SAMPLE Documentation of Recruitment and/ or Retention Incentives

### Title II, Part A Supporting Effective Instruction

Fiscal Year	
Local Education Agency	
Title II, Part A LEA Coordinator	
Title II, Part A GaDOE Specialist	

#### **RECRUITMENT AND RETENTION FINANCIAL INCENTIVES**

Local education agencies budgeting and expending grant money on recruitment and retention financial incentives must meet the requirements of the statute and non-regulatory guidance. Recipients of recruitment and retention financial incentives are not required to complete any work related to the grant in order to receive these incentives, thus this expenditure is not subject to Federal time and effort documentation requirements but must be documented in compliance with federal grant and local state guidance.

#### **ALLOWABILITY**

##### **ESEA/ ESSA- SEC. 2103. LOCAL USE OF FUNDS.**

(b) TYPES OF ACTIVITIES. —The programs and activities described in this subsection—

- (B) developing and implementing initiatives to assist in recruiting, hiring, and retaining effective teachers, particularly in low-income schools with high percentages of ineffective teachers and high percentages of students who do not meet the challenging State academic standards, to improve within-district equity in the distribution of teachers, consistent with section 1111(g)(1)(B), such as initiatives that provide—
  - (ii) differential and incentive pay for teachers, principals, or other school leaders in high-need academic subject areas and specialty areas, which may include performance-based pay systems;

#### **Requirement 1: Rationale**

*This may include specific recruitment/retention information, preferably over a period of years. Retention of specific teachers should also include documentation that records ‘helping students achieve academic success.’*

--

#### **Requirement 2: Budget Line Item**

*Please attach a printed copy of the approved budget line item with descriptions. Include any additional information below.*

--

#### **Requirement 3: Financial Incentive Recipients**

Teacher/ Principal Name	Certification ID	School Assignment	Title – Job Assignment (If applicable, include courses taught)

*If, districts choose to create and format their own documentation, it must, at a minimum, include 1) budget line item, 2) documentation of allowability in ESSA Sec. 2103, 3) a note explaining why this expenditure is exempt from Federal time and effort documentation requirements, and 4) justification for this expenditure to address local allowability*

# I. SAMPLE Private School Needs Assessment and Professional Development Plan

*Adapted from Sample Provided by DeKalb County School District*

LEA (District):	
School Year:	
Private School Name:	
Private School Address:	
K-12 Student Enrollment:	
Allocation Total:	
Private School Principal:	
Phone Number:	
Email Address:	
Private School Designee:	
Phone Number:	
Email Address:	

## Needs Assessment

**Identify your students' academic needs and teachers' professional development needs and provide appropriate data for support.**

**Prioritize Private School professional development needs.**

**Private School Services of Activities to be Funded by Title II, Part A.**

Describe the program services, interventions, or activities agreed upon by the private school and LEA/ District during initial and ongoing consultation. List program services, interventions, or activities in order of priority. Ensure all funded professional development aligns to the ESSA. For additional guidance on allowable uses, please consult GaDOE Private School Guidance, ED Fiscal Changes Non-Regulatory Guidance (ESSA), and still applicable ED NCLB guidance: Title IX, Part E Non-Regulatory Guidance (2009) and Title I Services to Eligible Private School Children (2003).

Prioritized Need #1	
Service, Intervention or Activity	
Level of Evidence Base Strong/ Moderate/ Promising	
Describe how this will meet the purpose(s) of Title II, Part A.	
How will the effectiveness of this activity be determined?	
How will the allowability of this activity be documented?	
Estimated Cost	
Date(s) or Timeline	
Prioritized Need #2	
Service, Intervention or Activity	
Level of Evidence Base Strong/ Moderate/ Promising	
Describe how this will meet the purpose(s) of Title II, Part A.	
How will the effectiveness of this activity be determined?	
How will the allowability of this activity be documented?	
Estimated Cost	
Prioritized Need #3	
Service, Intervention or Activity	
Level of Evidence Base Strong/ Moderate/ Promising	
Describe how this will meet the purpose(s) of Title II, Part A.	
How will the effectiveness of this activity be determined?	
How will the allowability of this activity be documented?	
Estimated Cost	

\_\_\_\_\_  
Signature of Private School Principal/ Designee & Date

\_\_\_\_\_  
Signature of LEA (District) Designee & Date

# J. SAMPLE Private School Expenditure Approval Form

*Adapted from Sample Provided by DeKalb County School District*

<b>LEA (District) Name:</b>	<b>Title II, Part A Coordinator:</b>
<b>Private School Name:</b>	<b>Private School Contact:</b>
<b>School Year:</b>	<b>Date of Submission:</b>
<b>DESCRIPTION: Briefly describe the expenditure(s) and how it will be funded.</b>	
<b>NEEDS: How does this expenditure meet the specific needs of the students (not the school itself)? [34 CFR 76.658]</b>	
<b>ALLOWABILITY: List to which Title II, Part A Local Use of Funds the expenditure MOST relates [ESSA Sec. 2103]</b>	
<b>ALLOWABILITY: What documentation is required to verify allowability under Federal, State and Local laws, regulations &amp; guidance? [2 CFR Part 200]</b>	
<b>EVALUATION: Succinctly describe how the private school will determine the effectiveness of the expenditure as it relates to the purpose of Title II, Part A.</b>	

## K. Title II, Part A Time and Effort Quick Guide

### Documenting Personnel Expenses Funded by Title II, Part A

Based on §200.430

*\*This quick guide is intended to supplement the Federal Programs Handbook and Federal Law/Guidance*

The guidance below is intended to assist LEAs in appropriately documenting personnel expenses for individuals for whom any part of their salary and wages is charged to Title II, Part A. The documentation must:

- Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated
- Be incorporated into the official records of the non-federal entity
- Be based on records that accurately reflect the work performed for salaries, substitutes and stipends.
- Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities
- Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-federal award

*EDGAR, 2 C.F.R. Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards - Section 430.*

#### **Important Definitions**

*(excerpted from Actions to Ease the Burden of Time and Effort Reporting, Enclosure C, 2012)*

- Periodic/Semiannual Certification – If an employee works solely on a single cost objective a certification must be completed to verify that the employee worked solely on that cost objective for the period covered by the certification. Complete at least annually.
- Personnel Activity Reports (PARs)/Time Logs - If an employee works on multiple cost objectives a report must be completed to support the distribution of the employee's total activities to support the distribution of the employee's salary and wages. Complete monthly or, at least, quarterly.
- Single Cost Objective – A function, grant, or activity for which costs are incurred. It is possible to work on a single cost objective even if an employee works on more than one federal award. The key to determining whether an employee is working on a single cost objective is whether an employee's salary and wages can be supported in full, from each of the funding sources supporting the position.
- Multiple Cost Objectives – Multiple functions, grants, or activities associated with a position that not only are supported by multiple funding sources, but which are not fully allowable under one or more of the supporting funding sources. (Administrative costs that would typically qualify as multiple cost objectives and would have to be documented using a PAR, could be streamlined and documented using Periodic Certification in the event that a LEA chooses to consolidate administrative funds).
  - Any job description that includes "other duties as assigned" indicates the possibility of multiple-cost objectives, therefore, the position must be documented by a time log of daily work activities. LEAs must follow their local procedures for time and effort.

## SAMPLE SCENARIOS TO ASSIST TITLE II, PART A LEA COORDINATORS IN DETERMINING DOCUMENTATION FOR PERSONNEL EXPENSES

(All positions, substitutes, stipends and additional compensation must be included in approved budget)

Personnel Expenditure	Funding Source(s)	Job Description	Required Time and Effort Documentation	Required Allowability Documentation
Salary for Class Size Reduction Teacher (1000 110)	Fully or Partially Funded by Title II, Part A	Title II, Part A class size reduction (CSR) teacher reducing class size (single cost objective).	<ul style="list-style-type: none"> <li>• <u>Periodic Certification</u> identifying the teacher name, school, fund source(s) and authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Budget Approval Items</u> <ul style="list-style-type: none"> <li>○ CSR Worksheet</li> <li>○ School Master Schedule</li> <li>○ Official Class Size Verification</li> </ul> </li> </ul>
Salary for Class Size Reduction Substitute Teacher (1000 113)	Fully or Partially Funded by Title II, Part A	Substitutes for class size reduction (CSR) teacher (single cost objective).	<ul style="list-style-type: none"> <li>• <u>Periodic Certification</u> identifying the substitute teacher, date(s) worked, fund source and authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation:</u> Documentation that connects the name of the substitute teacher, name of the CSR teacher, date(s) of absence, amount paid substitute, and funding source.</li> <li>• <u>Procedures</u> for daily pay rate for substitutes.</li> </ul>
Salary for Professional Development Substitute Teacher (2213 - 113)	Fully or Partially Funded by Title II, Part A	Substitutes for teacher attending professional development allowable under all funding sources (single cost objective).	<ul style="list-style-type: none"> <li>• <u>Periodic Certification</u> identifying the substitute teacher name, date(s) worked, fund source and authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation:</u> Documentation that connects the name of each substitute teacher with the corresponding name of the teacher attending Title II, Part A allowable professional development, School, Position, date(s) of absence, title of professional development activity, evidence of teacher's attendance, and evidence of allowability of the professional development activity attended.</li> <li>• <u>Procedures</u> for daily pay rate for substitutes.</li> </ul>
Stipends for Teacher, Assistant Principal, Principal, or Other School Leader, etc. Completing Professional Development (2213 - 116)	Fully or Partially Funded by Title II, Part A	Stipend for completing Title II, Part A allowable professional development (Single cost objective).	<ul style="list-style-type: none"> <li>• <u>Periodic Certification</u> identifying the staff member name, date(s) worked, fund source and authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation:</u> Documentation that connects the name of the staff member, position, site/school, date(s) of absence, title of professional development activity, evidence of staff member's attendance during off contract hours, amount of stipend to be paid and evidence of allowability of the professional development activity attended.</li> <li>• <u>LEA Policy</u> for payment of stipends (must comply w/ SBOE Board Rule 160-3-3.04).</li> </ul>

## SAMPLE SCENARIOS TO ASSIST TITLE II, PART A LEA COORDINATORS IN DETERMINING DOCUMENTATION FOR PERSONNEL EXPENSES

(All positions, substitutes, stipends and additional compensation must be included in approved budget)

Personnel Expenditure	Funding Source(s)	Job Description	Required Time and Effort Documentation	Required Allowability Documentation
Stipends for Teacher, Assistant Principal, Principal, or Other School Leader, etc. Completing Professional Development (2213 - 116)	Partially Funded by Title II, Part A	Stipend for completing professional development that is <u>not fully allowable</u> under Title II, Part A (multiple cost objectives).	<ul style="list-style-type: none"> <li>• <u>PAR/Time Log</u>: identifying the staff member name, date(s) worked, fund sources and activities completed and authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation</u>: Documentation that connects the name of the staff member, position, site/school, date(s) of absence, title of professional development activity, evidence of staff member's attendance during off contract hours, amount of stipend to be paid by each fund source and evidence of allowability of the professional development activity attended that correlates with amount funded.</li> <li>• <u>LEA Policy</u> for payment of stipends (must comply w/ SBOE Board Rule 160-3-3.04).</li> </ul>
Salary for Administrative/ Clerical Support (2230/2800 -142)	Fully funded by Title II, Part A	Provides support ONLY for the Title II, Part A program (single cost objective).	<ul style="list-style-type: none"> <li>• <u>Periodic Certification</u> identifying the staff member name, job title, site/ school, fund source and authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation</u>:                             <ul style="list-style-type: none"> <li>○ Job description must be attached in ConApp</li> </ul> </li> </ul>
Salary for Administrative/ Clerical Support (2230/2800 -142)	Partially Funded by Title II, Part A and other funding source(s)	Provides support for Title II, Part A and additional program(s) and activities are <u>not fully allowable</u> under one or more funding sources (multiple cost objectives).	<ul style="list-style-type: none"> <li>• <u>PAR/Time Log</u>: List of daily work activities (specific enough to determine allowability) for Title II, Part A and all other fund sources that make up part of regular salary. Must include total hours worked for each funding source and percentage of total time worked allocated to each funding source. Must include authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation</u>:                             <ul style="list-style-type: none"> <li>○ Job description must be attached in ConApp</li> </ul> </li> </ul>
Salary for LEA Coordinator for Title II, Part A Program (2230 - 190)	Fully Funded by Title II, Part A	Only job is to coordinate the Title II, Part A program (single cost objective).	<ul style="list-style-type: none"> <li>• <u>Periodic Certification</u> identifying the staff member name, job title, site/school, fund source, and authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation</u>:                             <ul style="list-style-type: none"> <li>○ Job description must be attached in ConApp</li> </ul> </li> </ul>



**SAMPLE SCENARIOS TO ASSIST TITLE II, PART A LEA COORDINATORS IN DETERMINING DOCUMENTATION FOR PERSONNEL EXPENSES**

(All positions, substitutes, stipends and additional compensation must be included in approved budget)

Personnel Expenditure	Funding Source(s)	Job Description	Required Time and Effort Documentation	Required Allowability Documentation
Salary for LEA Coordinator for Title II, Part A Program (2230 - 190)	Partially Funded by Title II, Part A and other funding source(s)	Coordination of the Title II, Part A program is one of several jobs; activities are not fully allowable under one or more funding sources (multiple cost objectives).	<ul style="list-style-type: none"> <li>• <u>PAR/Time Log</u>: List of daily work activities (specific enough to determine allowability) for Title II, Part A and all other fund sources that make up part of regular salary. Must include total hours worked for each funding source and percentage of total time worked allocated to each funding source. Must include authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation</u>:                             <ul style="list-style-type: none"> <li>○ Job description must be attached in ConApp</li> </ul> </li> </ul>
Salary for Instructional/ Academic Coach or Professional Development Specialist (2213 - 190/191)	Fully or Partially Funded by Title II, Part A	Instructional/ Academic Coach or Professional Development Specialist conducting allowable professional development. All job duties allowable under all funding sources (single cost objective).	<ul style="list-style-type: none"> <li>• <u>Periodic Certification</u> identifying the staff member name, job title, site/school, fund source, and authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation</u>:                             <ul style="list-style-type: none"> <li>○ Job description must be attached in ConApp</li> </ul> </li> </ul>
Salary for Instructional/ Academic Coach or Professional Development Specialist (2213 - 190/191)	Partially Funded by Title II, Part A and other funding source(s)	Instructional/ Academic Coach or Professional Development Specialist whose job activities are not fully allowable under one or more funding sources (multiple cost objectives).	<ul style="list-style-type: none"> <li>• <u>PAR/Time Log</u>: List of daily work activities (specific enough to determine allowability) for Title II, Part A and all other fund sources that make up part of regular salary. Must include total hours worked for each funding source and percentage of total time worked allocated to each funding source. Must include authorizing signature</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation</u>:                             <ul style="list-style-type: none"> <li>○ Job description must be attached in ConApp</li> </ul> </li> </ul>

**SAMPLE SCENARIOS TO ASSIST TITLE II, PART A LEA COORDINATORS IN DETERMINING DOCUMENTATION FOR PERSONNEL EXPENSES**

(All positions, substitutes, stipends and additional compensation must be included in approved budget)

Personnel Expenditure	Funding Source(s)	Job Description	Required Time and Effort Documentation	Required Allowability Documentation
Salary/Additional Compensation for Teacher or School Leader Mentor, including principal supervisor, during school day (2213 - 199)	Fully or Partially Funded by Title II, Part A and other funding source(s)	Teacher Mentor or Leader Mentor, including principal supervisor, provides mentoring to teacher recipient or assistant principal/ principal (single cost objective).	<ul style="list-style-type: none"> <li>• <u>Periodic Certification</u> identifying the mentor name, job title (teacher/mentor, principal/mentor, teacher mentor, school leader mentor, principal supervisor). If teacher, must include position, site/school, fund source(s), and authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation:</u> <ul style="list-style-type: none"> <li>○ Job description must be attached in ConApp</li> <li>○ Procedures for awarding salary/ additional compensation to include recommended documentation that connects the name of the mentor, name of mentee, position of mentee. If teacher, must include position, site/school, amount of payment for mentoring services provided.</li> </ul> </li> </ul>
Additional Compensation for Teacher Leader for allowable Title II, Part A activities during the school day (2213 - 199)	Fully or Partially Funded by Title II, Part A and other funding source(s)	Teacher Leader conducts Title II, Part A allowable activities (additional leadership responsibilities)	<ul style="list-style-type: none"> <li>• <u>Periodic Certification</u> identifying the staff member name, job title, date(s) and authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation:</u> <ul style="list-style-type: none"> <li>○ Job description must be attached in ConApp</li> <li>○ Procedures for awarding salary/ additional compensation to include documentation that connects the name of the staff leading the activity with the dates and times of allowable activities to verify occurrence, documentation supporting evidence the activity occurred, site/school, amount of payment to staff for leading the activity and evidence of allowability of the activity.</li> </ul> </li> </ul>
Salary/Additional Compensation for Staff Providing Professional Development (2213 - 199)	Fully or Partially Funded by Title II, Part A and other funding source(s)	Teacher Leader, PD Staff, Curriculum Staff, Technology Staff, or School Leader, provides Title II, Part A Allowable Professional Development on Academic Content or Best Practices Outside of Contracted Hours (single cost objective).	<ul style="list-style-type: none"> <li>• <u>Periodic Certification</u> identifying the staff member name, job title, date(s) and authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation:</u> <ul style="list-style-type: none"> <li>○ Job description must be attached in ConApp</li> <li>○ Procedures for awarding salary/ additional compensation to include documentation that connects the name of the staff providing professional development with the dates and times of professional development to verify occurrence outside of contract hours, attendance roster with names and positions of attendees, site/school, amount of payment to staff for providing professional development and evidence of allowability of the professional development activity provided (deliverables).</li> </ul> </li> </ul>

**SAMPLE SCENARIOS TO ASSIST TITLE II, PART A LEA COORDINATORS IN DETERMINING DOCUMENTATION FOR PERSONNEL EXPENSES**

(All positions, substitutes, stipends and additional compensation must be included in approved budget)

Personnel Expenditure	Funding Source(s)	Job Description	Required Time and Effort Documentation	Required Allowability Documentation
Salary/ Additional Compensation for Staff Providing Professional Development (2213 - 199)	Partially Funded by Title II, Part A and other funding source(s)	Teacher Leaders, PD Staff Curriculum Staff, Technology Staff, or School Leaders provides Professional Development on Academic Content or Best Practices Outside of Contracted Hours. Training activities are not fully allowable under one or more funding sources (multiple cost objectives).	<ul style="list-style-type: none"> <li>• <u>PAR/Time Log</u>: List of daily work activities (specific enough to determine allowability) for Title II, Part A and all other fund sources that make up part of regular salary. Must include total hours worked for each funding source and percentage of total time worked allocated to each funding source. Must include authorizing signature.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>Allowability Documentation</u>:                             <ul style="list-style-type: none"> <li>○ Job description must be attached in ConApp</li> <li>○ Procedures_for awarding salary/ additional compensation to include documentation that connects the name of the staff providing professional development with the dates and times of professional development to verify occurrence outside of contract hours, attendance roster, site/school, amount of payment to staff for providing professional development and evidence of allowability of the professional development activity provided.</li> </ul> </li> </ul>
Financial Incentive (1000/2400 199)	Title II, Part A	Teachers, Principals, or Other School Leaders	<ul style="list-style-type: none"> <li>• Not subject to time and effort documentation; but must be documented in compliance with federal grant and local state guidance.</li> </ul>	<ul style="list-style-type: none"> <li>• <u>GaDOE Documentation for Financial Incentives</u>, Title II, Part A Handbook.</li> </ul>

## L. OPTIONAL Title II, Part A Effectiveness Documentation Form

<b>School Year</b>		<b>LEA Name</b>		<b>LEA Coordinator</b>	
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### Directions:

The Georgia Department of Education requires local education agencies (LEA) to determine the effectiveness of Title II, Part A funded activities (ESSA Section 2104(a)(1) and 2 CFR §200.301).

- This document may be used by LEAs to document the effectiveness of each Title II, Part A funded strategy. Columns 1-7 are completed at the beginning of the year for each Title II, Part A funded strategy and Column 8 is to be completed at the end of the fiscal year.
- It is recommended that this completed document and the data and analysis of data supporting the effectiveness described in Column 8 be maintained in the LEA files.

	Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
	Goal/Need	Title II, Part A Funded Strategy	Allowability	Evidence Base	Effectiveness Data	Administration	Timeline	Effectiveness & Next Steps
	Select from the dropdown, the need aligned to the Title II, Part A funded strategy in column 2.	Title II, Part A Funded Strategies <i>[PL activities must align to ESSA Definition Sec. 8101(42) &amp; SBOE Rule160-3-3-.04]</i>	Select from the dropdown the ESSA local use of funds that most closely authorizes the strategy. <i>[Sec. 2103]</i>	<ul style="list-style-type: none"> <li>• Strong</li> <li>• Moderate</li> <li>• Promising</li> <li>• Demonstrates a Rationale <i>[Sec. 8101(21)]</i></li> </ul>	List data to be collected to monitor and measure effectiveness of funded strategies.	List person(s) (by position) responsible for collecting, coordinating and analyzing data to measure effectiveness.	Timeline for collecting coordinating and analyzing data.	Select from the dropdown to assert the level of effectiveness of the IIA funded strategy. Provide a brief year-end summary of data and an analysis supporting the effectiveness assertion including the LEA's next steps for this funded strategy in the analysis.
1	<i>Select a Need</i>		<i>Select Use of Funds</i>	<i>Select Evidence Base Level</i>				<i>Select End of Year Effectiveness Summary and Analysis of Effectiveness Assertion:</i>
2	<i>Select a Need</i>		<i>Select Use of Funds</i>	<i>Select Evidence Base Level</i>				<i>Select End of Year Effectiveness Summary and Analysis of Effectiveness Assertion:</i>
3	<i>Select a Need</i>		<i>Select Use of Funds</i>	<i>Select Evidence Base Level</i>				<i>Select End of Year Effectiveness</i>

	Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8
	Goal/Need	Title II, Part A Funded Strategy	Allowability	Evidence Base	Effectiveness Data	Administration	Timeline	Effectiveness & Next Steps
								<i>Summary and Analysis of Effectiveness Assertion:</i>
4	<i>Select a Need</i>		<i>Select Use of Funds</i>	<i>Select Evidence Base Level</i>				<i>Select End of Year Effectiveness Summary and Analysis of Effectiveness Assertion:</i>
5	<i>Select a Need</i>		<i>Select Use of Funds</i>	<i>Select Evidence Base Level</i>				<i>Select End of Year Effectiveness Summary and Analysis of Effectiveness Assertion:</i>
6	<i>Select a Need</i>		<i>Select Use of Funds</i>	<i>Select Evidence Base Level</i>				<i>Select End of Year Effectiveness Summary and Analysis of Effectiveness Assertion:</i>
7	<i>Select a Need</i>		<i>Select Use of Funds</i>	<i>Select Evidence Base Level</i>				<i>Select End of Year Effectiveness Summary and Analysis of Effectiveness Assertion:</i>
8	<i>Select a Need</i>		<i>Select Use of Funds</i>	<i>Select Evidence Base Level</i>				<i>Select End of Year Effectiveness Summary and Analysis of Effectiveness Assertion:</i>
9	<i>Select a Need</i>		<i>Select Use of Funds</i>	<i>Select Evidence Base Level</i>				<i>Select End of Year Effectiveness Summary and Analysis of Effectiveness Assertion:</i>

*(Required by ESSA, Title II, Part A, Sec. 2001, 2102(b)(2)(D); Sec. 2104(a)(1); Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards OMB 2 CFR Part §200.301)*