

Questions Log
 FY19 Budget Planning Webinar
 August 3, 2018

	QUESTION	RESPONSE
1	Will the Federal Programs Handbook be changing in the next 4-6 weeks? Can we print this to guide our budgets and anticipate no changes in the next few weeks?	The Federal Programs Handbook was updated on August 2, 2018 and there are no plans to updated in the next 4-6 weeks. However, if additional updates are needed, we will notify LEAs when a new handbook is posted and the sections that were modified.
2	Does the email regarding a transfer of federal funds need to come from the Superintendent?	The email notice to GaDOE indicating the LEAs desire to transfer funds may be submitted by the Federal Programs Director or contact. Since a variety of local staff need to be aware of transferred funds, it is recommended that the Superintendent and other appropriate local staff be copied on the communication.
3	Is it \$25000 per purchase (Suspension and Debarment) or per year?	Page 31 of the Federal Programs Handbook states that “Any contract or subcontract expected to equal or exceed \$25,000 must be checked against the System for Award Management (SAM) for suspension or debarment (includes contracted tutors)”. This requirement applies to each contract.
4	Does the micro purchase provision of \$10,000 mean an individual purchase or aggregate purchases to a vendor?	Page 27 of the Federal Programs Handbook states “LEAs should calculate the aggregate dollar amount for each purchase order of supplies or services.”.
5	If you hold an intervention after the first 30 days of school and ELs participate, will an LEA be in violation of not sending the letter within the 30-day time frame? We may not know that ELs will participate until we review the data (could be a second semester or summer intervention program)	Section 1112(e)(3)(A) states that “not later than 30 days after the beginning of the school year, inform parents of an English learner identified for participation or participating in such a program...” The intent of the federal law is to keep the parents informed of their child’s progress from the beginning through the end of the school year. If your LEA is planning to offer a summer program in 2019 then your Notice to Parents at the beginning of the school year can inform the parent that the child as in need of extra English language support and in the spring the school/teacher will re-evaluate the child’s progress to enroll the child in the summer program.
6	Will districts still have to provide an initial consultation meeting for private schools if they had trouble attending a state meeting?	Yes. Please have a back-up plan in place in case a private school cannot attend.
7	If private schools in a district choose to attend a state consultation meeting in several locations, is the district required to send representatives to each location where the GaDOE meeting is being hosted?	If you have a private school attending a meeting, please have a representative attend the first portion of the meeting. You may want to reach out to the private schools and suggest a preferred site to reduce your attendance at additional meeting sites.
8	When will we receive the private school set-aside allocation?	Some allocations are posted. All six program areas will be posted in the next few weeks.
9	Do we have to do the parents right to know if we don’t have any EL students?	The Parents Right To Know notice is for all students. Please refer to the Title II Professional Qualifications webpage at http://www.gadoe.org/School-Improvement/Teacher-and-Leader-

		<p>Effectiveness/Pages/Professional-Qualifications-(PQ).aspx for guidance and sample notices.</p> <p>The Title I Parent Notification of Student Eligibility for Supplemental Language Support Services is only for parents of English learners who need extra English language assistance to become proficient in English. For a template in English and 14 other languages, visit the Family-School Partnership’s Parents of ELs webpage at http://www.gadoe.org/School-Improvement/Federal-Programs/Partnerships/Pages/Parents-of-English-Learners.aspx</p>
10	For the private school invitations...should we send an invitation that includes the locations of all nearby meeting locations or choose 1? For example, there are 3 meeting locations that are about the same distance from our district. If we do send all nearby locations, should the district have representation at each location meeting?	Please send out the registration form to all of your private schools which will include all sites across the state. I will send out the locations that private schools selected so you know which sites are being attended. You may want to reach out to the private schools and suggest a preferred site to reduce your attendance at additional meeting sites.
11	So, if a Private School cannot attend the State meeting set forth by your dates - the LEA should still conduct a meeting to make sure they have all information?	Yes. Please have a back-up plan in place in case a private school cannot attend.
12	Are districts with no private schools required to attend the FY19 Private School meetings?	If the district wants the Statewide Initial Consultation to substitute for the required District Initial Consultation meeting, then a representative from the LEA/District will need to be in attendance.
13	It sounded like we need to check the SAM website for every purchase once the threshold has been met. I thought we could check this site every July 1 and be good for the year.	The SAM website must be checked for suspension and debarment status as each new contract or subcontract (including a different agreement with an existing vendor) is initiated during the year.
14	Regarding Evidence-based Intervention, do we add the required word in the budget for personnel, e.g. Family Engagement Coordinator?	Page 108 of the Federal Programs Handbook provides details on selecting evidence-based interventions. Specifically, page 120 identifies purchase that would not require an evidence-based. A family engagement coordinator could be considered “program administration” where an evidence-based would not be needed.
15	If you have a required set-aside but use more than the required amount should that be identified in two separate entries?	There is no federal requirement that set asides must be separated when the LEA chooses to set aside more than the “required” amount. However, an LEA must remember that the “minimum” required 1% set aside must be incurred or the remaining balance must be carried over into the next fiscal year. Separating the set aside may be easier for the LEA when trying to keep up with required spending levels at year’s end, but there is no limitation to the amount allowed in a single set aside.
16	In admin consolidation, does indirect costs have to come from	For Title I, Part A, indirect costs are calculated separately from administrative costs. There is an embedded worksheet in the Title I program within the Con. App. to assist in this calculation.

	the 10% allowable admin set-aside?	<p>For Title II, Part A, LEAs include indirect costs as administrative costs when determining 10% administrative costs.</p> <p>Remember that LEAs may exceed the 10% administrative limitation set by the program office if a written justification is provided that shows that exceeding 10% of the total original allocation is reasonable and necessary.</p>
17	Please confirm that the 1% parent set-aside can be distributed based on need, not an equal or equitable distribution.	The 1% required set-aside does not have to be equally distributed to all Title I schools within the district. The LEA has the flexibility to place the funds (a minimum of 90% of the 1%) at their schools where needs exist. There should be a reasonable justification for the method of distribution chosen, but there is no requirement to distribute these funds equally to each school (nor by PPA).
18	Who decides if we are using the 1.6 multiplier for CEP and what is its purpose?	The LEA makes the decision to use the 1.6 CEP multiplier or not. The purpose of the “multiplier” is to equalize poverty percentages between FRL determined proportions and CEP determined proportions. Since CEP only takes into account the direct certification student count (SNAP/TANF) and FRL includes both free and reduced status students, the federal government developed the multiplier as an equalizer.
19	Do we need to attach something showing where the N&D program students are captured in an attendance zone?	Although capturing the attendance zone for N&D students could be helpful information to illustrate coverage, it is not required for budget approval. N&D “Program” students are counted with the school they attend. If rezoning occurs that reassigns the N&D service area, then those students would be counted with the new assigned school.
20	How much constitutes a viable program?	This is an LEA determination. The design/justification of any Title I program is based on the SWP/TA plan. The plan outlines how Title I funds will supplement the required basic education and address the identified needs in the plan. The plan/initiatives must be adequately funded for it to be a viable program. A discussion with your Title I Area Specialist is highly suggested if you have concerns with the viability of your Title I program at any school.
21	If I understood correctly then, comparability will not be determined by RAMP? We are using the old methods still?	Comparability and Supplement not Supplant are two different fiscal requirements. The RAMP is designed to serve as a method to verify the LEA is meeting Supplement Not Supplant requirements. Comparability remains to be calculated initially using the comparability application within the consolidated application. If comparability options using the application are exhausted, then the LEA with the assistance of a Title I Program Manager can apply the LEAs implementation of their RAMP as an alternative methodology for meeting compliance with comparability guidelines. The RAMP is a final option, not a replacement for determining comparability.
22	If you intended to move a school to SWD but things changed, and it is better to keep them TA... what do we need to do?	The decision to serve a school as a SWP or TA program is completely at the discretion of the LEA. If an LEA works with a TA school to become a SWP school, and then decides to keep the TA school a TA school, there is no penalty or recourse. Please notify your area specialist if this change is made. Please remember that SWP schools must maintain 40% poverty threshold. However, there is a “grandfather” clause that will allow a school that drops below the 40% threshold (but above the 35% minimum for Title I service) can

		be continued as a SWP school for one year without consequence. Again, always work closely with your Title I Area Specialist if this option is taken.
23	Will you revisit the 2210 and 2213 codes? If a principal attends a workshop, which function should be used?	Guidance provided by GaDOE Financial Review directs LEAs to allocate professional development for instructional staff in 2213 and for non-instructional staff in the functional categories in which the individuals' salaries are charged. As the instructional leader of the school, a principal's professional development may be charged in 2213 or 2400.
24	Where can I find the methods for determining the homeless set aside?	The four methods are listed during the McKinney-Vento portion of the budget webinar, which begins at the 2:45 pm mark. The four optional methods are listed below: <ul style="list-style-type: none"> • Identify homeless student needs and fund accordingly • Obtain a count of homeless students and multiply by the district's Title I, Part A per-pupil allocation (PPA) • Reserve an amount greater than or equal to the district's McKinney-Vento subgrant request • Reserve a specific percentage of the district's poverty level or its Title I, Part A allocation
25	If you give different amounts with the 1% set aside for FE, won't that put you out of rank order?	The 1% set-aside for Family Engagement is not included in the calculations for rank order as the set-aside is a DISTRICT Expenditure rather than school level, thus the rank order is not affected.
26	Can you confirm that we can use Title I funds for a "well rounded" education interventions as identified in the CNA Title I fund for a "well rounded" education interventions as identified in the CNA not just for academic needs.	ESSA has expanded its focus to encompass the inclusion of initiatives to address the well-rounded child and his/her educational development in areas beyond the core academic areas as was the focus under NCLB. One must remember that ESSA includes many different funding sources with which to accomplish this task. Title IV was designed to help address more of these expanded service areas (gifted, the arts, technology, safety, etc.). Title I CAN be used to assist in the implementation of initiatives outside of the core academic areas, but one must remember that any such initiative funded by Title I must still address the identified needs (as in the CNA/DIP/SIP-SWP) of the academically at-risk.
27	Can Title I-A fund interpreters?	Title I can pay for interpreters for Title I funded/required activities only.
28	When dividing the Set Aside money up, would it be a good idea to give the schools designated as an ESOL school more money to purchase items for parents to help those students.	From Meg - Dividing the "Set-Aside" is not a Title III question, since Title III does not have "Set-Asides". If this is a question about "distributing the system's QBE ESOL allotments to schools", then that is a District decision. Title I perspective- If the needs for ELs are identified in the school's CNA and/or SIP/SWP plan funds from the school's Title I allocation can definitely utilize their Title I funds to supplement ESOL initiatives already in place. District set-asides for EL identified needs are possible; but, must be clearly delineated in the District CLIP (CNA & DIP). Such set-aside funds can ONLY be used at Title I SWP schools and at TA schools where EL students are a member of the identified TA service group.

29	Are we required to include an N&D statement in the parent policy?	If students are being educated at LEA schools, the LEA schools' parent and family engagement policy/plan must include a statement that the residential facilities in its school attendance area are included in the parent and family engagement correspondence and activities. If students are being educated at an N or D facility, then the facility must have a parent and family engagement policy/plan, correspondence, and activities to the extent feasible. The GaDOE Grants Program staff will conduct the monitoring for this requirement. Please refer to p. 13 of the <u>FY19 Cross Functional Monitoring Document</u> .
30	Can Title II-A pay for training of district staff if it's specifically targeting rolling out training to schools on a district or cohort implementation - like a train the trainer model?	To the extent that a LEA determine it is more costs effective to train district staff to redeliver than to bring in an external contractor for PD, a district may choose this as a method for providing PD. However, documentation for this practice, must be treated in a manner that is comparable to bringing in a contract. The LEA must not only document that training of the district office staff, but also the training of that individual to teachers and/or leaders, including agendas, sign-in sheets, presentation materials.
31	In admin consolidation, does indirect costs have to come from the 10% allowable admin set-aside from II-A?	In accordance with Section III D of the Cost Allocation Guide for State and Local Governments (2017) administrative costs include both direct and indirect costs. Some indirect costs are not administrative in nature. For this reason, in Georgia, Title II, Part A asks LEAs to include indirect costs as administrative costs when determining 10% administrative costs. Remember that LEAs may exceed the 10% administrative limitation set by the program office if a written justification is provided that shows that exceeding 10% of the total original allocation is reasonable and necessary.
32	For districts transferring Title II, Part A funds into Title I, Part A, what attachments are required?	The attachments required in FY19 depend on how a LEA plans to budget money in FY19 and how they budgeted money in FY18. Because this can be complicated, Title II, Part A has developed a Budget Attachment Requirement Chart found on the Title II, Part A Resources webpage of the GaDOE website.
33	Can you use Title II funds to provide professional development to central office staff that work in the schools daily?	GaDOE advises comparing the central office staff roles with the grant purpose and LEA allowable use of funds. Each use of funds specifies eligible recipients. Title II, Part A purpose clearly identifies the recipients of the professional learning as teachers, principals and other school leaders charged with the daily instructional leadership and managerial operations.
35	Re: Title IV - Our plan is to transfer the majority of our Title IV allocation into Title I (and then consolidate for our schoolwide schools). We do plan to leave an amount of \$5000 for our high school (not a Title I school). Will we have to budget the remaining \$5000 into each of the three areas, or can we focus on just one area?	The final amount of Title IV, A funds remaining after transfer would be subject to all applicable requirements under ESSA. If the amount of IV-A funds remaining after transfer is less than \$30,000 than the LEA would only be required to budget funds to address at least one of the three focus areas (WR, SH, ET).
37	Clarification- Private Schools still do not receive carry-over for Title IV correct?	Private schools do not receive carryover funds for Title IV, A unless there are extenuating circumstances.

38	Can we put the school name in the description or do we have to specify under the School tab.	When developing the Title IV-A budget, please include the school name under the school tab.
39	I hope I didn't miss this, but how do we determine the allocation for private schools? Is there a worksheet?	The GaDOE will send notify LEAs via email of their Title IV-A private school calculations for FY19. Additionally, the report will be posted on the State Ombudsman website. LEAs that will provide the private school allocations for Title IV-A. For IDEA, the equitable services allocation (proportionate share) is located in the Consolidated Application IDEA 611 Flow-through grant under Program Information.
40	Would teacher registrations to the STEM conference in Athens in October be an allowable expense, including travel?	Yes, this would be an allowable use of Title IV-A funds given that the district has identified a need and it is part of their plan, as well ensuring that it is reasonable, necessary and supplemental
41	Is there a comprehensive guide for all Federal Programs that summarizes information such as: Con App due date, % of Administrative allowance, allowable carryover %, completion deadline, etc.?	The Federal Programs <u>Handbook</u> : Overarching Requirements for All Federal Programs includes this information.
42	Homeless Set Aside: If we did not use our Homeless Set-Aside, will we carry it over and add additional Homeless funds or will each year be a "new" year?	The homeless set-aside is a part of Title I, Part A; therefore, at the end of the fiscal year, any unused homeless set-aside funding can revert back to Title I, Part A. The LEA has the discretion to add the carry-over homeless set-aside to the following year.
43	Are students in a N&D facility considered to be in Foster Care and receive the McKinney-Vento rights?	<p>Children and youth living in a residential facility who need care due to abandonment, neglect, or death of their parents or guardians are defined as neglected. Children and youth living in a residential facility who have been adjudicated to be delinquent or in need of supervision are defined as delinquent. N&D children are not categorically eligible for McKinney-Vento or considered foster care students. McKinney-Vento eligibility is determined on a case-by-case basis by the LEA McKinney-Vento Liaison.</p> <p>Some students, not all students, in residential facilities may be classified as foster care youth or eligible for McKinney-Vento. For instance, the student could be in between foster care placements and has been placed at the facility while in DFCS custody. Some students, not all students, in residential facilities may be classified as foster care youth. For instance, the student could be in between foster care placements and has been placed at the facility while in DFCS custody. All students who are identified as Foster Care students do need to receive immediate enrollment, just as McKinney-Vento students. The immediate enrollment protections are identical for foster care youth and McKinney-Vento youth.</p> <p>To determine which students are in foster care at the residential facilities, I would begin to have the conversation with facility staff</p>

		<p>about providing you with a list of students who are in foster care and/or DFCS custody, if possible. The facilities should be familiar with how the students were placed. You (or facility staff) can also begin to build a relationship with the DFCS case workers who should be interacting with the youth at the facilities to determine their classification as well. Your regional DFCS Education Support Monitors (ESM) http://epac.dhs.ga.gov/Contact.aspx, <i>may</i> be able to let you know if a student is in foster care as well. The ESM may even help to facilitate the acquisition of needed paperwork for enrollment!! Lastly, your district's foster care point of contact <i>may</i> have access to which youth are in care.</p>
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