

ESEA: Title V, Part B 2020-2021 Annual Report

Rural Education Achievement Program



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Title V, Part B Program Staff

Georgia Department of Education

Federal Programs Division

Title V, Part B
Rural Education Achievement Program

Eric McGhee, Grants Program Manager

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Georgia's System of Continuous Improvement



Georgia's System of Continuous Improvement guides the work of the Georgia Department of Education (GaDOE) to ensure that the work of the agency is aligned across all divisions, departments, and programs. The Georgia's Systems of Continuous Improvement framework focuses on the systems and structures (the "what") that must be in place for sustained improvement in student outcomes. It also utilizes a problem-solving model (the "how") to provide a clear process for identifying improvement needs, planning for improvement, and implementing, monitoring, and evaluating the improvement efforts. This framework is designed to provide meaningful support to schools and districts in the school improvement process.

Grant Implementation Overview

In Georgia, the Georgia Department of Education (GaDOE) sets policy, develops guidance and provides training and technical assistance for Georgia LEAs. A Grants Programs Manager and one Education Program Specialist provide technical assistance to all Title V, Part B grantees in the state. Training is coordinated at a state level and delivered through (a) virtual learning series, (b) collaborative federal program sessions and webinars, and (c) Grants Unit only webinars. The GaDOE publishes an annual LEA Title V, Part B Handbook and maintains a public website containing resources to support LEAs in the implementation and oversight of the Title V, Part B program. In addition, the Federal Programs website contains the overarching handbook addressing overarching requirements for all federal programs.

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The Federal grant (15-month grant cycle) is cyclical in nature, beginning in July and ending September of the following year. In Georgia, LEAs begin by completing an internal Comprehensive Needs Assessment and consolidated federal grant application called the Consolidated LEA Improvement Plan (CLIP) and Consolidated Application, respectively. The application is maintained in the Georgia Longitudinal Data System (LDS) and is supported by regional Continuous Improvement Teams (CITs). Once approved, LEAs submit a budget based on their formula-based allocation. Then LEAs administer the grant, submitting budget adjustments/amendments, as needed. Although LEAs can carryover 100% of allocated funds, it is expected that LEAs, in the best interests of teachers and students, draw down funds

regularly through the year and expend all funds as budgeted. LEAs' work is supported by the Title V, Part B Education Program Specialist; however, LEAs requiring targeted support may be further assisted by Continuous Improvement Teams (CIT) comprised of staff across three GaDOE Divisions (Federal Programs, School and District Effectiveness, and Teaching and Learning).

LEAs are formally monitored for compliance through GaDOE Cross-functional Monitoring (CFM) every four years, and/or depending on annual risk assessment results more frequently. The Title V, Part B Education Program Specialist, along with the Program Manager and other members of the Grants Unit, are cross trained and are scheduled to monitor the Title V, Part B program in their assigned LEAs; a practice which encourages objectivity and fosters a stronger alignment of expectations and technical assistance. As a transition period following the adjusted FY20 Cross Functional Monitoring schedule which did not conclude until the fall of 2021 after being suspended due to school closures in March 2020, no LEAs were monitored in FY21. The regular monitoring cycle will be reinstated in FY22. All FY20 monitoring findings were resolved in FY21 via Corrective Action Plans. LEAs receiving findings as part of the cross-functional monitoring completed corrective actions to ensure they have internal controls and protocols that ensure compliance with federal law, federal regulations (EDGAR), and federal and state guidance. Based on the GaDOE 4-year cross-functional monitoring cycle, any LEA that does not participate in CFM completes an annual self-monitoring review.

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The Georgia Department of Education (GaDOE) provides continual training, professional development, and support to Title V, Part B grant recipients throughout each fiscal year. In addition to providing individualized face-to-face training at the request of local educational agencies (LEAs), GaDOE provides periodic online trainings on topics such as development of a comprehensive needs assessment, developing the annual plan based on identified needs, budgeting funds, completing the annual evaluation, monitoring requirements, and more. In addition, training materials are available via the website, the federal programs handbook, and other disseminated print materials. The Title V, Part B Program Specialist works with RLIS grantees on an ongoing basis via email, telephone, and face to face meetings to provide individualized technical assistance to districts.

In Georgia, LEAs are required to have an external audit each year. Any audits from prior fiscal years that require program review are reported by the Georgia Department of Audits to GaDOE and GaDOE program staff resolve these audits. These are resolved directly with the LEAs.

LEAs conclude the federal fiscal year with a completion report, finalized in the Grants Accounting Online Reporting System (GAORS).

RLIS Objectives and Outcomes

Title V, Part B of Every Student Succeeds Act, or ESSA, provides funding to address the unique needs of rural local education agencies (LEAs) that:

1. Lack the personnel and resources needed to compete effectively for Federal competitive grants.
2. Receive formula grant allocations often too small to be effective in meeting their intended purpose.

There are two separate grant programs within Title V, Part B:

- The Small Rural School Achievement Grant Program (SRSA) (Section 5211) is funded directly by the U.S. Department of Education (US ED).
- The Rural and Low-Income School Program (RLIS) (Section 5221) provides federal funds to the Georgia Department of Education (GaDOE) which allocates funds to rural LEAs serving concentrations of poor students.
- Under ESSA, LEAs may be found eligible for both programs and must select either SRSA or RLIS.

The Georgia Department of Education's (GaDOE) strategic plan outlines nine strategic goals to ensure that each Georgia student is afforded a high quality and holistic public education. The Rural and Low-Income Schools Program (RLIS) aligns with and supports strategic goals 1, 2, 3, 6 and 7 as described in Georgia's Strategic Plan, and as listed below, to support the academic goals of both the state as a whole and LEAs. LEAs develop their individual goals based upon needs identified through Georgia's Systems of Continuous Improvement framework. LEAs' progress is determined based on their schools meeting established performance indicators, which are assessed annually through state-administered assessments and local performance assessments.

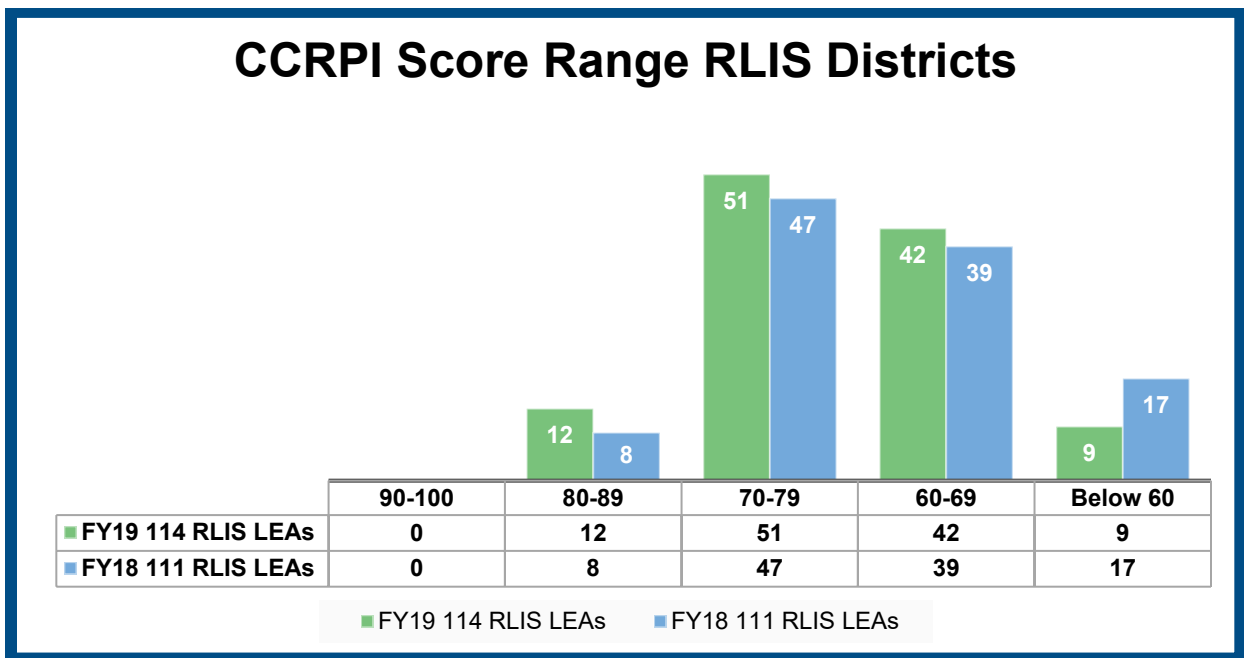
The strategic goals that align with the RLIS program are:

- Revise/develop and implement viable academic standards that engage learners with essential knowledge, skills, and enduring concepts;
- Increase the percentage of K-5 students with a strong knowledge of foundational skills and concepts;
- Increase the percentage of high school graduates who are college and / or career ready;
- Increase LEA, leader, and teacher effectiveness through high-quality service and support; and
- Increase the number of schools with a safe, healthy, and positive learning climate.

RLIS LEA CCRPI Score Distribution

The College and Career Ready Performance Index – CCRPI – is Georgia’s annual tool for measuring how well its schools, districts, and the state itself are preparing students for the next educational level. It provides a comprehensive roadmap to help educators, parents, and community members promote and improve college and career readiness for all students.

The CCRPI includes five main components each scored on a scale of 0 to 100: Achievement, Progress, Closing Gaps, Readiness, and Graduation Rate (high school only). These components, encompassing multiple indicators, are combined for a total CCRPI score on a scale of 0 to 100.



Sources: CCRPI District Score Report (FY18, 111 RLIS LEAs); CCRPI District Score Report (FY19, 114 RLIS LEAs)

The state average CCRPI score in FY19 was 75.9 and the average for the 114 RLIS districts was 71.04. In FY18, the state average score was 76.6 and was 69.15 for the 111 RLIS districts. Overall, RLIS LEAs are showing improvement with more school districts moving up in the CCRPI score range.

On March 27, 2020, the United States Department of Education (ED) approved Georgia's request to waive statewide assessment, accountability, and reporting requirements in the Elementary and Secondary Education Act (ESEA) for the 2019-2020 school year due to widespread school closures related to COVID-19). Therefore, there are no 2020 CCRPI reports. On March 26, 2021, ED approved Georgia's waiver of several accountability, school identification, and report card requirements. Thus, there are no CCRPI summary scores for the state, school districts, or schools for FY21.

2020-2021 State Education Agency (SEA) Allocation

SEA allocations are determined using a formula outlined in ESSA. The state formula is based on the number of students in average daily attendance served by the eligible local educational agency (LEA). The GaDOE sets aside 5% of the amount of the grant for State administrative costs.

FY21 Allocation Information LEAs eligible for the Rural and Low-Income School Program	
FY21 Total Title V, Part B allocation to GADOE from USED	\$6,327,162
FY21 Title V, Part B Administration set aside - 5%	(\$316,358)
Total Title V, Part B Allocation to Districts	\$6,010,804
Per Pupil Average based on ADA Recount- RLIS eligible only LEAs	\$20.35
Number of LEAs receiving RLIS funds	107

Source: GRANT AWARD NOTIFICATION S358B200010; US Department of Education, Washington, D.C. 20202

Title V, Part B provides funds for rural and low-income districts to be used for supplemental activities authorized under the following federal formula grants:

Title I, Part A (Improving Basic Programs Operated by LEAs)
Title II, Part A (Improving Teacher Quality)
Title III (Language Instruction for English Learners and Immigrant Students)
Title IV, Part A (Student Support and Academic Enrichment Grants)
Parent Involvement Activities

2020-2021 Rural and Low-Income Schools Program LEA Eligibility

Title V, Part B awards grants to eligible local educational agencies based on formula. A local educational agency is eligible to receive a grant if:

1. 20 percent or more of the children ages 5 through 17 served by the local educational agency are from families with incomes below the poverty line based on data provided by the United States Census Bureau and United States Department of Education (USDE).; and
2. All the schools served by the agency are designated with a local code of 32,33, 41, 42, or 43, as determined by the National Center for Education Statistics based on the geographic location of each individual school in the LEA.

Rural Education Initiative Eligibility	
Districts Receiving RLIS allocation	107
Dual Eligible Districts (SRSA and RLIS)	9
SRSA Eligible Only	4

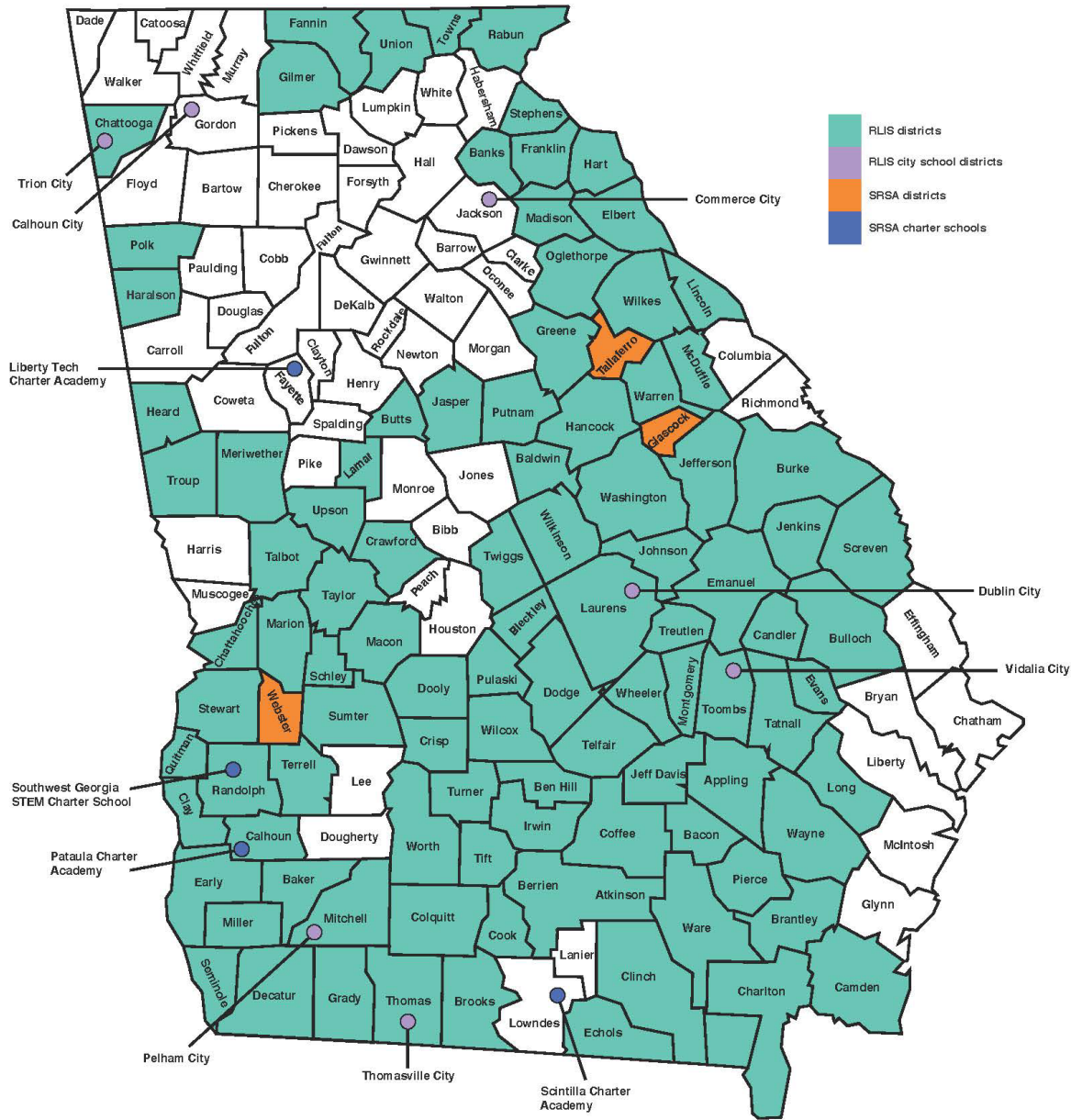
Source: REAP Fiscal Year 2021 Eligibility Summary; US Department of Education

- 110 districts were eligible for RLIS in FY21
 - 9 were Dual eligible for SRSA and RLIS and had to choose one program
 - 3 of the 110 chose SRSA (Glascock, Taliaferro, and Webster)
 - 107 districts received FY21 RLIS allocations

- 4 eligible for SRSA only and must apply to USED:
 - Commission Charter Schools- Liberty Tech Charter Academy
 - Commission Charter Schools- Pataula Charter Academy
 - Commission Charter Schools- Southwest Georgia S.T.E.M. Chart
 - State Charter Schools- Scintilla Charter Academy



FY21 Title V, RLIS State Map



2020-2021 LEA Allocations

Allocations are received from the United States Department of Education (ED) in early summer, after which allocations to LEAs are determined by GaDOE and approved by the State Board of Education. Eligible LEAs may obligate Title V, Part B funds during the federal fiscal year for which the funds were appropriated and during the succeeding federal fiscal year. The funding period gives the eligible LEAs 27 months to obligate their funds. It is the expectation of the US ED and the GaDOE that Title V, Part A, RLIS funding be expended during the year in which it is allocated. There are no carryover limitations placed on Title V, Part B funds.

	LEA	Eligible ADA	FY21 Title V Allocation
1	APPLING COUNTY	3,362	68,423
2	ATKINSON COUNTY	1,583	32,217
3	BACON COUNTY	2,048	41,680
4	BAKER COUNTY	271	5,515
5	BALDWIN COUNTY	4,855	98,808
6	BANKS COUNTY	2,738	55,723
7	BEN HILL COUNTY	2,946	59,956
8	BERRIEN COUNTY	3,010	61,259
9	BLECKLEY COUNTY	2,406	48,966
10	BRANTLEY COUNTY	3,258	66,306
11	BROOKS COUNTY	2,056	41,843
12	BULLOCH COUNTY	10,142	206,408
13	BURKE COUNTY	3,892	79,209
14	BUTTS COUNTY	3,320	67,568
15	CALHOUN COUNTY	530	10,786
16	CAMDEN COUNTY	9,092	185,039
17	CANDLER COUNTY	2,103	42,800
18	CHARLTON COUNTY	1,628	33,133
19	CHATTAHOOCHEE COUNTY	876	17,828
20	CHATTOOGA COUNTY	2,601	52,935
21	CLAY COUNTY	184	3,745
22	CLINCH COUNTY	1,264	25,725
23	COFFEE COUNTY	7,259	147,734
24	COLQUITT COUNTY	9,013	183,431
25	COOK COUNTY	2,960	60,241
26	CRAWFORD COUNTY	1,645	33,479
27	CRISP COUNTY	3,717	75,648
28	DECATUR COUNTY	4,785	97,383
29	DODGE COUNTY	2,971	60,465
30	DOOLY COUNTY	1,157	23,547
31	EARLY COUNTY	1,928	39,238
32	ECHOLS COUNTY	809	16,465
33	ELBERT COUNTY	2,882	58,654
34	EMANUEL COUNTY	4,021	81,835
35	EVANS COUNTY	1,782	36,267
36	FANNIN COUNTY	2,919	59,407
37	FRANKLIN COUNTY	3,570	72,656
38	GILMER COUNTY	4,048	82,384
39	GRADY COUNTY	4,411	89,772

	LEA	Eligible ADA	FY21 Title V Allocation
40	GREENE COUNTY	2,427	49,394
41	HANCOCK COUNTY	788	16,037
42	HARALSON COUNTY	3,172	64,556
43	HART COUNTY	3,429	69,786
44	HEARD COUNTY	1,985	40,398
45	IRWIN COUNTY	1,627	33,112
46	JASPER COUNTY	2,262	46,036
47	JEFF DAVIS COUNTY	2,919	59,407
48	JEFFERSON COUNTY	2,354	47,908
49	JENKINS COUNTY	1,093	22,245
50	JOHNSON COUNTY	1,078	21,939
51	LAMAR COUNTY	2,536	51,612
52	LAURENS COUNTY	6,258	127,362
53	LINCOLN COUNTY	1,067	21,715
54	LONG COUNTY	3,582	72,900
55	MACON COUNTY	1,210	24,626
56	MADISON COUNTY	4,814	97,974
57	MARION COUNTY	1,285	26,152
58	MCDUFFIE COUNTY	3,662	74,528
59	MERIWETHER COUNTY	2,387	48,580
60	MILLER COUNTY	863	17,564
61	MITCHELL COUNTY	2,160	43,960
62	MONTGOMERY COUNTY	845	17,197
63	OGLETHORPE COUNTY	2,044	41,599
64	PIERCE COUNTY	3,477	70,763
65	POLK COUNTY	7,550	153,656
66	PULASKI COUNTY	1,281	26,071
67	PUTNAM COUNTY	2,819	57,372
68	QUITMAN COUNTY	298	6,065
69	RABUN COUNTY	2,142	43,594
70	RANDOLPH COUNTY	713	14,511
71	SCHLEY COUNTY	1,236	25,155
72	SCREVEN COUNTY	2,211	44,998
73	SEMINOLE COUNTY	1,386	28,208
74	STEPHENS COUNTY	3,792	77,174
75	STEWART COUNTY	425	8,650
76	SUMTER COUNTY	4,241	86,312
77	TALBOT COUNTY	427	8,690
78	TATTNALL COUNTY	3,567	72,595

	LEA	Eligible ADA	FY21 Title V Allocation
79	TAYLOR COUNTY	1,349	27,455
80	TELFAIR COUNTY	1,617	32,909
81	TERRELL COUNTY	1,205	24,524
82	THOMAS COUNTY	5,494	111,813
83	TIFT COUNTY	7,516	152,964
84	TOOMBS COUNTY	2,754	56,049
85	TOWNS COUNTY	938	19,091
86	TREUTLEN COUNTY	1,053	21,430
87	TROUP COUNTY	11,578	235,633
88	TURNER COUNTY	1,145	23,303
89	TWIGGS COUNTY	746	15,182
90	UNION COUNTY	2,761	56,191
91	THOMASTON-UPSON COUNTY	3,941	80,206
92	WARE COUNTY	5,809	118,224
93	WARREN COUNTY	595	12,109
94	WASHINGTON COUNTY	3,028	61,625
95	WAYNE COUNTY	5,107	103,937
96	WHEELER COUNTY	941	19,151
97	WILCOX COUNTY	1,129	22,977
98	WILKES COUNTY	1,398	28,452
99	WILKINSON COUNTY	1,248	25,399
100	WORTH COUNTY	3,070	62,480
101	CALHOUN CITY	3,892	79,209
102	COMMERCE CITY	1,634	33,255
103	DUBLIN CITY	2,204	44,855
104	PELHAM CITY	1,343	27,332
105	THOMASVILLE CITY	2,678	54,502
106	TRION CITY	1,311	26,681
107	VIDALIA CITY	2,407	48,987
	Totals	295,345	6,010,804

Source: FISCAL YEAR 2021 SPREADSHEET FOR SMALL, RURAL SCHOOL ACHIEVEMENT PROGRAM AND RURAL LOW-INCOME SCHOOL PROGRAM; Georgia Department of Education

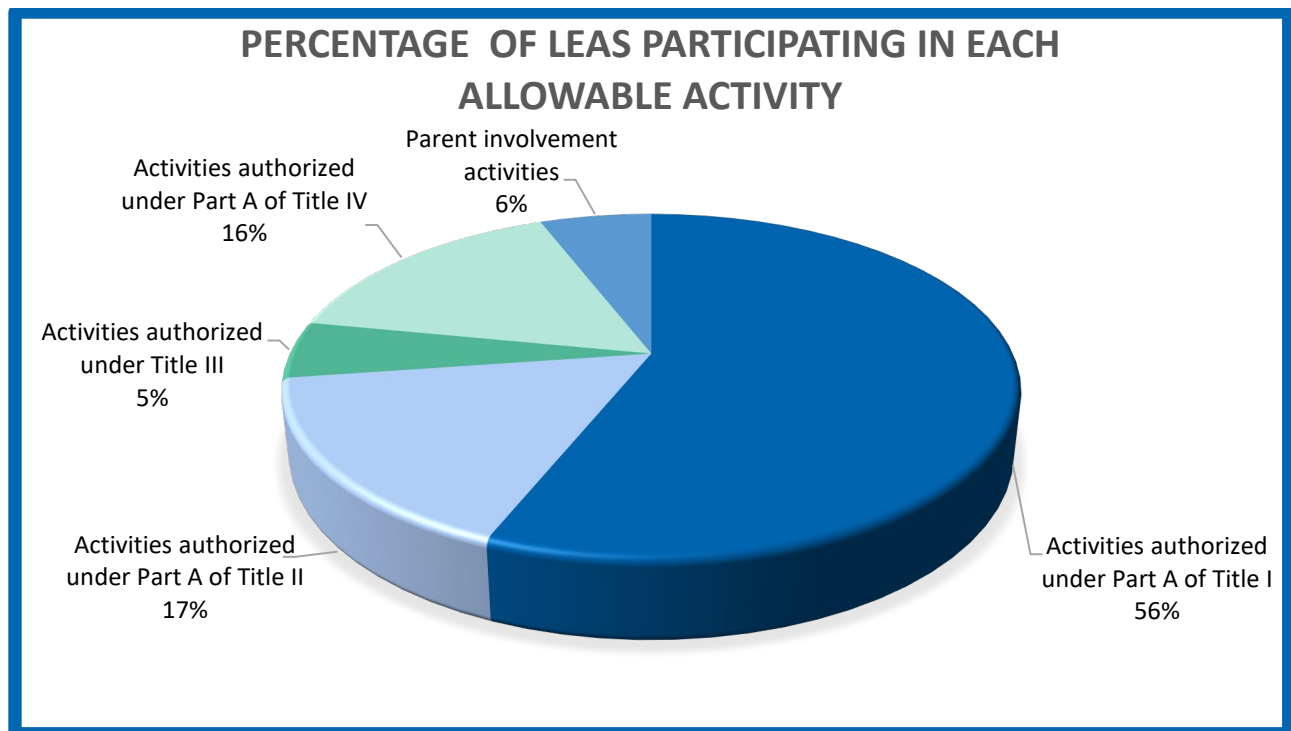
Maintenance of Effort

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. When notified by the GaDOE Finance Division that an LEA has failed to maintain effort, GaDOE Title I, Part A program staff completes the necessary waiver on behalf of the LEA. In FY21, all LEAs met maintenance of effort.

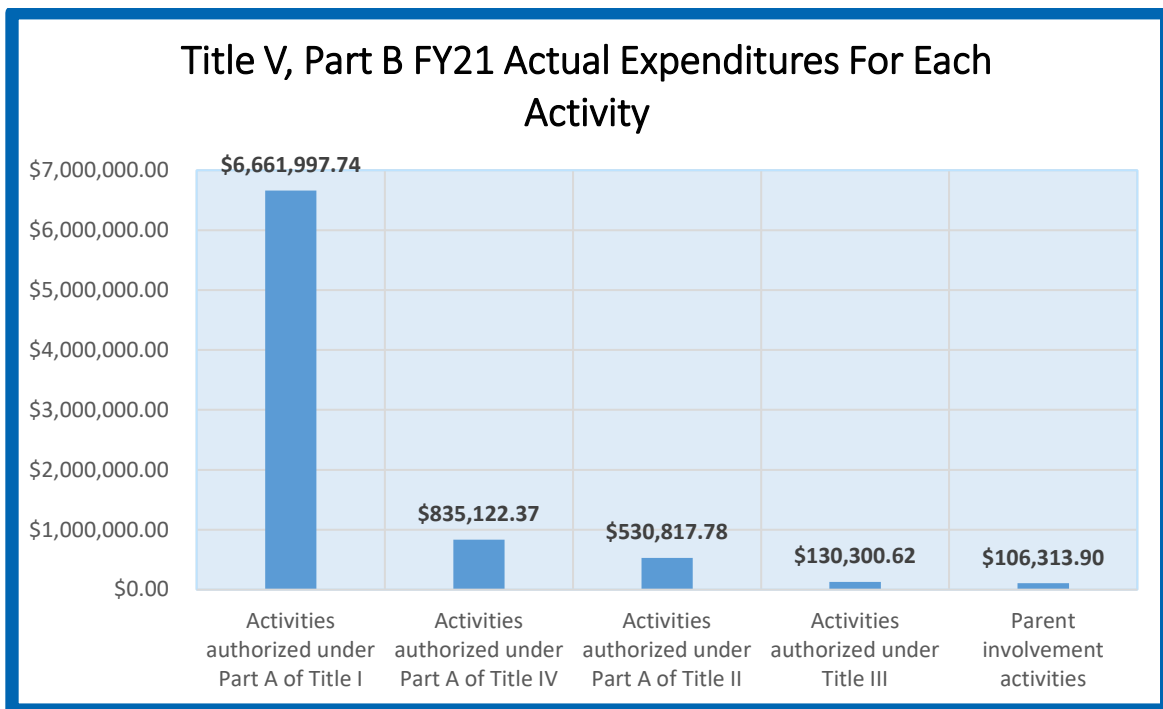
2020-2021 Title V, Part B Expenditures

Source: FY22 Annual Evaluation Report submitted by LEAs

Each LEA receiving Title V, Part B funds may choose to expend funds for any of the authorized activities under the allowed federal formula programs authorized under ESSA. Funds must supplement activities implemented in the district based on identified needs. At the end of each fiscal year, after submitting the Program Completion Report to Grants Accounting, districts must submit an Annual Evaluation Report indicating the activities for which the district expended funds, and the amount of funds expended for each activity or program. The following pie chart reports the percentage of RLIS districts participating in each of the allowed federal formula programs in FY21. It should be noted that many activities overlap across the federal programs for which Title V, Part B funds may be expended. For example, professional learning is an allowable for more than one of the programs or activities, so an LEA may report this activity under Title I or Title II. The decision of where to report each activity is the decision of the district.



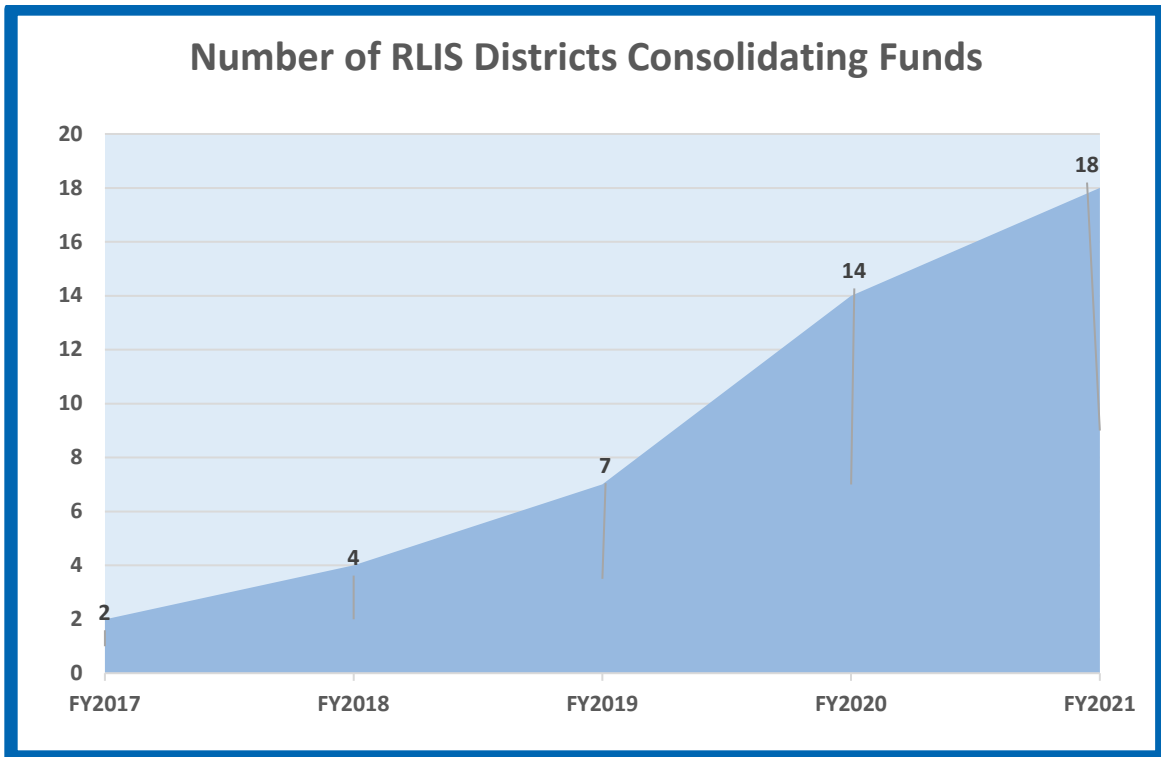
Each LEA reports the actual amount of funds expended for each authorized activity during the fiscal year. During budget development, the LEA reports the amount of anticipated expenditures for each activity, and after the fiscal year has ended the LEA reports the actual expenditures for each activity. The actual expenditures must align with the Program Completion Report submitted to Grants Accounting on October 30 of each fiscal year. The expenditures reported include the current year allocation plus any carryover funds from the previous year, and any funds transferred into Title V, Part B from either Title IV, Part A or Title II, Part A or a combination thereof. The chart below reports the amount of funds expended under Title V, Part B for each of the five authorized activities.



Title V, Part B Consolidation of Funds

Under ESSA, LEAs are granted some flexibility in determining how they can best meet the needs of their LEA. This includes the ability to coordinate funds through a traditional budget, consolidate federal funds, consolidate federal and state funds or transfer funds into Title V, Part B.

Consolidation: Title I schools running a schoolwide program may choose to consolidate funds. By consolidating eligible federal funds in a schoolwide program, a school can more effectively design and implement a comprehensive plan to upgrade the entire educational program in the school as identified through a comprehensive needs assessment.



Source: Consolidation of Funds Cohort Directory; Georgia Department of Education

The chart above indicates how interest grows each year in Consolidation of Funds. Most of the RLIS districts who participated in consolidation chose to include Title V, Part B funds in the consolidation budget; however, some did not consolidate these funds and budgeted them outside of consolidation to fund district initiatives. Consolidating funds offers greater flexibility in meeting the academic needs of students.

Title V, Part B Transferability 2020-2021

ESEA allows LEAs the flexibility to target eligible Federal funds to the programs and activities that most effectively address the unique needs of LEAs. The LEA may transfer all or any lesser amount of their Title II, Part A or Title IV, Part A allocations into Title V, Part B. Title V, Part B funds may not be transferred out and into another federal program. When funds are transferred into Title V, Part B, the funds become Title V, Part B funds and must adhere to the provisions in ESSA for the implementation of the Title V, Part B program activities and expenditure of funds. Title V, Part B allocations may be spent for activities authorized under certain federal formula programs as previously stated in this report, including Title II, Part A and Title IV, Part A.

Number of RLIS Districts Participating in Transferability	Title II, Part A Funds Transferred Into Title V, Part B	Title IV, Part A Funds Transferred Into Title V, Part B	Total Funds Transferred Into Title V, Part B
19	\$1,413,704	\$936,785	\$2,350,489

Source: FY21 GaDOE Consolidated Application Transferability Report

Supplement Not Supplant

Title V, Part B funds must supplement and not supplant all local, state, and other federal funds. In general, when considering whether a proposed RLIS activity is supplemental, an LEA should determine whether it would have funded this activity with other federal, state, or local funds if no REAP funds were available. If the result of this determination is that no other federal, state, or local funds are available to fund the proposed activity, then the LEA may be able to use REAP funds for those activities, provided they are an allowable use of RLIS funds.

There are three situations when it will be presumed that supplanting has occurred:

- if the activity is one that would ordinarily be covered with other federal, state, or local funds (for example, in most cases, standard textbook purchases would ordinarily be covered with state or local funds),
- if the LEA previously funded the activity with other federal, state, or local funds, or
- if the activity is state-mandated or required by federal law (e.g., provision of certain services to English learners required by federal civil rights laws).

The burden of proof lies with the LEA in ensuring that no Title V, Part B expenditures are supplanting local, state, or other federal funds.

Monitoring of Title V Part B

As the state pass through entity, GaDOE is responsible for overseeing the successful implementation of Title V, Part B in LEAs who receive an allocation and implement activities using RLIS funds. According to the Uniform Grants Guidance (2 CFR 200.328), monitoring by the non-federal entity must cover each program, function, or activity.

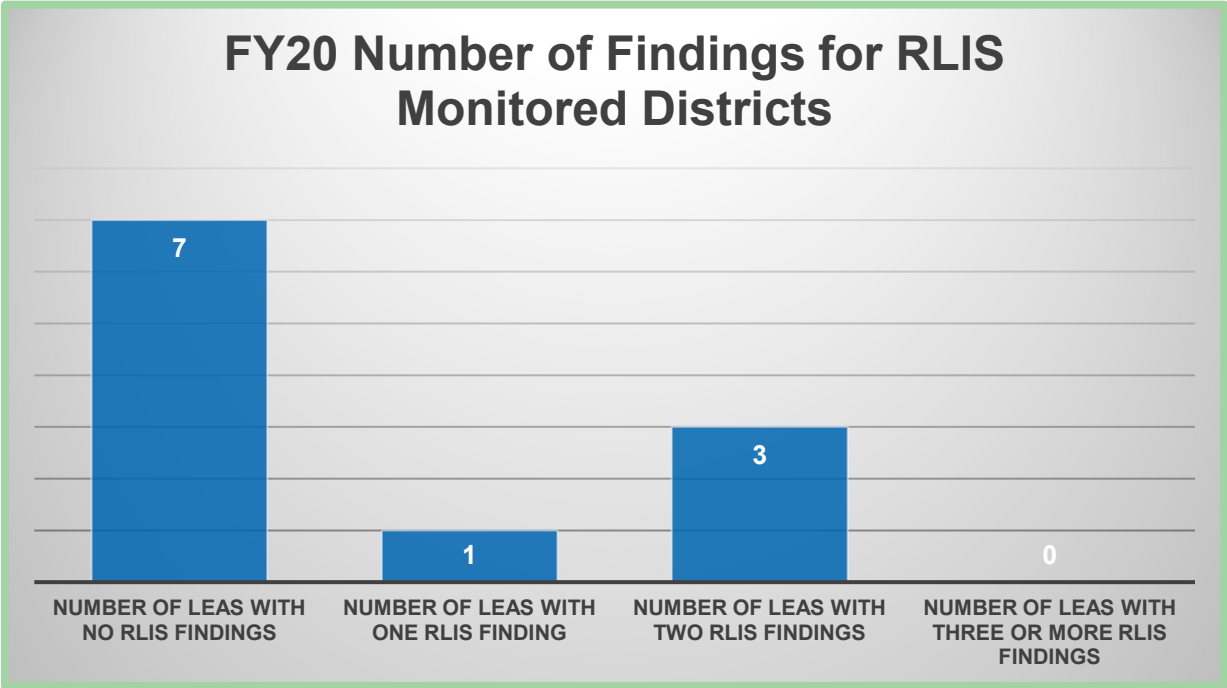
LEAs are monitored on a four-year cycle. Approximately one-fourth of the LEAs are monitored each year. As part of the annual review process in determining which LEAs are to be monitored, the Division of Federal Programs conducts a risk assessment using a combination of elements defined by GaDOE. An LEA's 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 SEA has the responsibility to monitor high-risk LEAs (§ 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 or 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.

2020-2021 Title V, Part B Monitoring Findings

GaDOE monitors on a 4-year cycle and adds LEAs who are High Risk according to the annual risk assessment. Due to a global pandemic, the FY20 monitoring cycle was interrupted because the Georgia Governor issued an executive order to close schools in March 2020. In FY21 no LEAs were monitored; therefore the chart below addresses the most recent monitoring cycle from FY20. The most common areas for findings are in expenditures. GaDOE staff commonly find errors in internal controls and lack of supporting documentation that illustrate compliance with statute and applicable regulations.



Source: FY20 GaDOE Cross Functional Monitoring Reports

Monitoring Analysis

Title V, Part B monitors districts for the following indicators:

1. LEA Monitoring of Programs
2. Consolidated LEA Improvement Plan (CLIP) and Schoolwide, Targeted Assistance Plans
3. Internal Controls, Expenditures, Inventory, Cost Principles, Drawdowns
4. Title V, Part B, Rural and Low-Income Schools Programs

Most findings centered around internal controls as evidenced by a lack of completeness and clarity in the written procedures in the LEA. Written procedures are essential to operating federal programs and to maintain compliance with federal law and regulations. The districts all completed a Corrective Action Plan in response to the specific findings to revise and strengthen these procedures and the documentation maintained at the district as evidence of compliance with the law.