

# ESEA: Title V, Part B 2021-2022 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

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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 throughout 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. Following the FY 21 suspension of monitoring due to the FY 20 school closures, the regular monitoring cycle was reinstated in FY 22. All findings were addressed and corrected through 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, virtual 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.

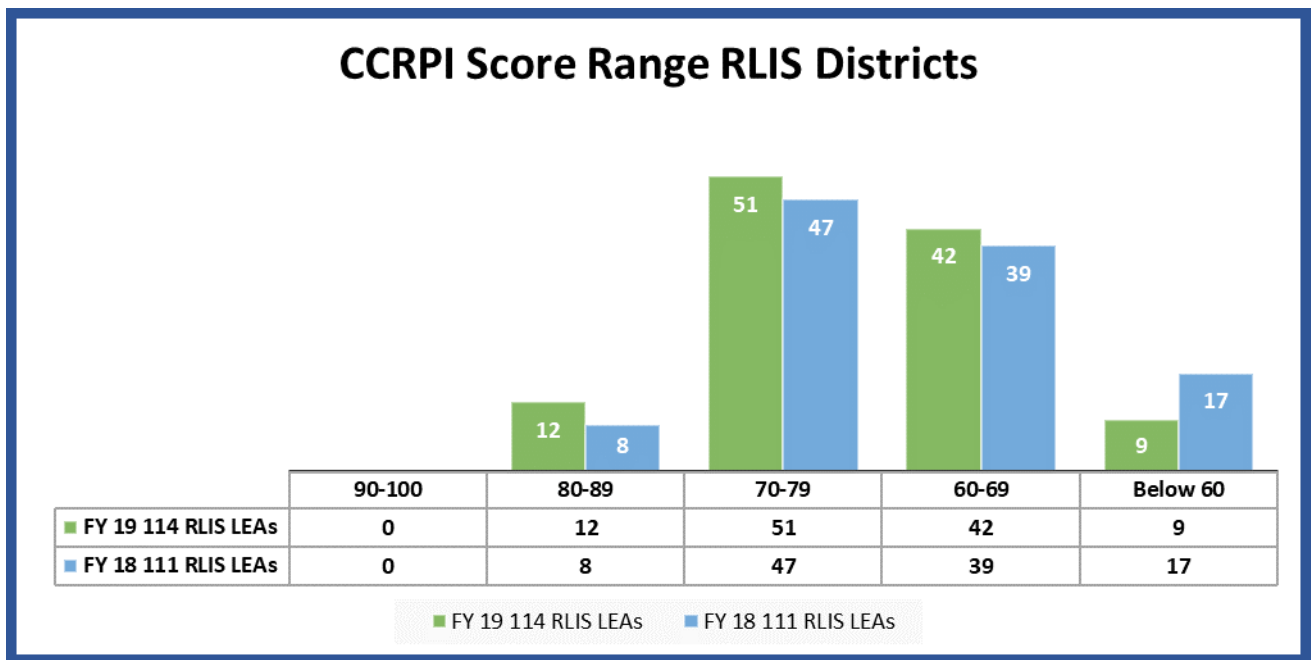
The strategic goals that align with the RLIS program are:

- 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 (FY 18, 111 RLIS LEAs); CCRPI District Score Report (FY 19, 114 RLIS LEAs)

The state average CCRPI score in FY 19 was 75.9 and the average for the 114 RLIS districts was 71.04. In FY 18, 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 FY 21. In

2022, the U.S. Department of Education invited each state to submit an addendum to its state ESSA plan outlining one-year modifications to its accountability plan as a result of pandemic-related data limitations. Georgia’s addendum request was approved in May 2022. Given the impact of pandemic-related data limitations on states’ accountability systems, the U.S. Department of Education approved Georgia’s one-year modifications to CCRPI which include no Summative Ratings (no overall 0-100 CCRPI or Single Score reported); for Progress, no ELA and math progress (SGPs) reported; no Closing Gaps reported; and for Readiness, no Student Attendance at elementary, middle, and high school reported and no College and Career Readiness at high school reported. Therefore, the chart above represents the most current district summative CCRPI scores.

The Distinguished Schools designation recognizes Title I schools that ranked in the top 5% based on a combined ELA and Math Achievement Rate score from FY 21 College & Career Ready Performance Index (CCRPI) Content Mastery data. While a full CCRPI report was not available in 2021 due to data limitations resulting from the pandemic and an associated federal waiver, Content Mastery data was available since students took state assessments in 2021. Georgia identified 71 Title I schools as Distinguished Schools and 25 of the 71 were from school districts receiving Title V, Part B funds.

## 2021-2022 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.

<b>FY 22 Allocation Information</b>	
<b>LEAs eligible for the Rural and Low-Income School Program</b>	
<b>FY 22 Total Title V, Part B allocation to GADOE from USED</b>	<b>\$ 7,378,516</b>
<b>FY 22 Title V, Part B Administration set aside - 5%</b>	<b>(\$368,925)</b>
<b>Total Title V, Part B Allocation to Districts</b>	<b>\$7,009,591</b>
<b>Per Pupil Average based on ADA Recount- RLIS eligible only LEAs</b>	<b>\$24.21</b>
<b>Number of LEAs receiving RLIS funds</b>	<b>106</b>

Source: GRANT AWARD NOTIFICATION S358B210010; US Department of Education, Washington, D.C. 20202



# Use of Funds

The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESEA) authorizes two Rural Education Achievement Program (REAP) programs: the Small, Rural School Achievement (SRSA) program and the Rural and Low-Income School (RLIS) program. RLIS funds may be used for any allowable activities under Title I, Part A, Title II, Part A, Title III, and Title IV, Part A, as well as parental involvement activities. Both SRSA and RLIS funds must be used to supplement, and not supplant, any other Federal, State, or local education funds. An LEA may only use REAP funds for allowable costs, as defined in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements (Uniform Guidance, [2 C.F.R. Part 200](#)), which include, among other things, the requirement that costs be reasonable and necessary for the accomplishment of program objectives. However, the question of allowability is fact specific, for example, whether a use of funds is reasonable and necessary and supplements but does not supplant other uses of funds depends on the specific circumstances in the LEA.

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:

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

*ESEA SEC. 5222. [20 U.S.C. 7351a] Uses of Funds*

# 2021-2022 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.

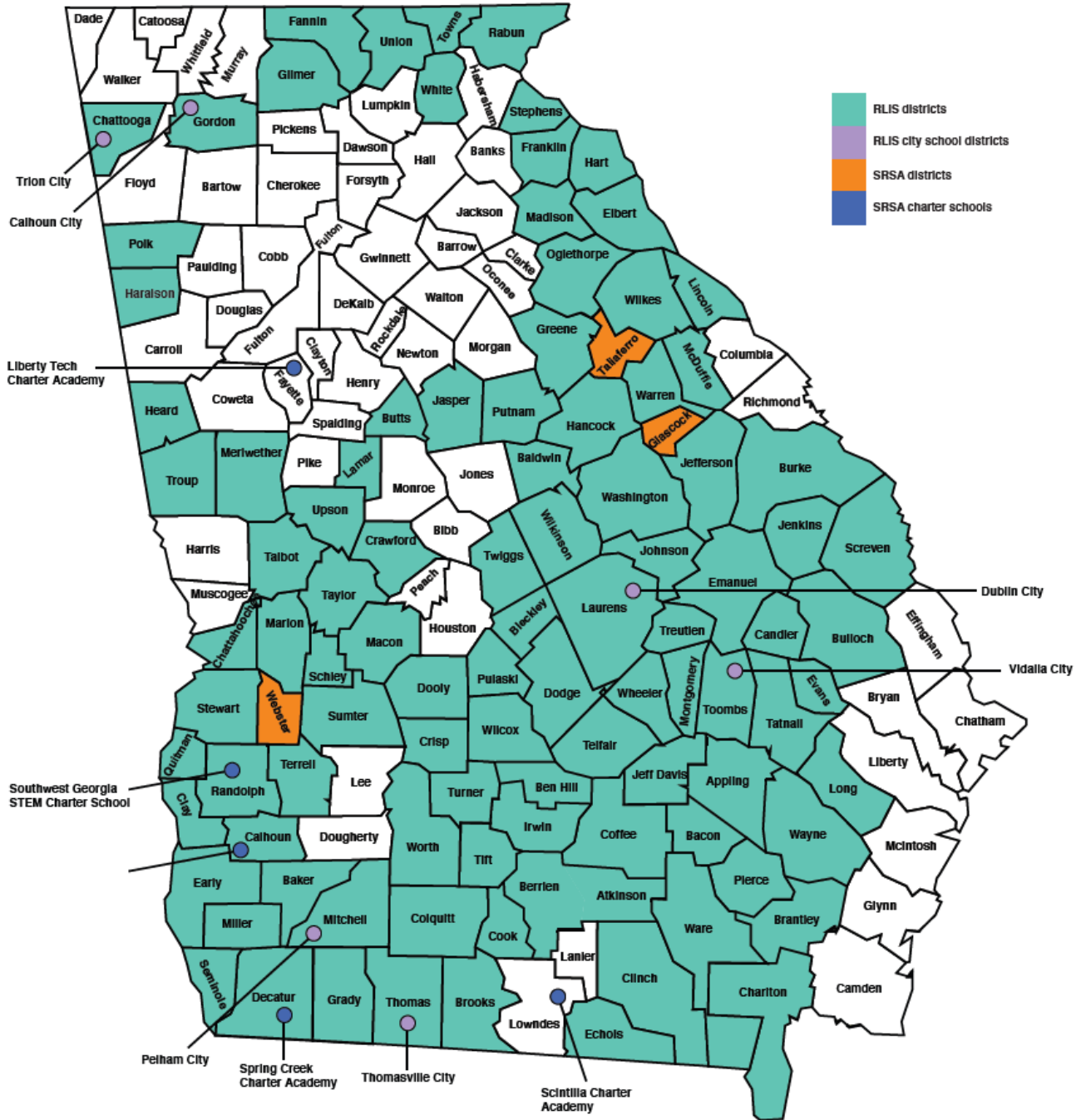
Rural Education Initiative Eligibility	
Districts Eligible for RLIS allocation	108
Dual Eligible Districts (SRSA and RLIS)	7
SRSA Eligible Only	6

*Source: REAP Fiscal Year 2022 Eligibility Summary; US Department of Education*

- 108 districts were eligible for RLIS in FY 22
  - 7 were Dual eligible for SRSA and RLIS and had to choose one program
  - 2 of the 108 chose SRSA (Taliaferro and Webster)
  - 106 districts received FY 22 RLIS allocations
  - +
- 6 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
  - State Charter Schools II-Spring Creek Charter Academy
  - Glascock County



# FY22 Title V, RLIS State Map



## 2021-2022 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	FY 22 Title V Allocation
1	APPLING COUNTY	3,343	80,940
2	ATKINSON COUNTY	1,592	38,545
3	BACON COUNTY	2,013	48,739
4	BAKER COUNTY	246	5,956
5	BALDWIN COUNTY	4,746	114,910
6	BEN HILL COUNTY	2,879	69,706
7	BERRIEN COUNTY	3,015	72,999
8	BLECKLEY COUNTY	2,385	57,745
9	BRANTLEY COUNTY	3,247	78,616
10	BROOKS COUNTY	2,075	50,240
11	BULLOCH COUNTY	10,386	251,465
12	BURKE COUNTY	3,991	96,630
13	BUTTS COUNTY	3,353	81,183
14	CALHOUN COUNTY	507	12,275
15	CANDLER COUNTY	2,092	50,651
16	CHARLTON COUNTY	1,592	38,545
17	CHATTAHOOCHEE COUNTY	900	21,791
18	CHATTOOGA COUNTY	2,586	62,612
19	CLAY COUNTY	195	4,721
20	CLINCH COUNTY	1,248	30,216
21	COFFEE COUNTY	7,317	177,159
22	COLQUITT COUNTY	8,884	215,099
23	COOK COUNTY	2,969	71,885
24	CRAWFORD COUNTY	1,621	39,248
25	CRISP COUNTY	3,656	88,519
26	DECATUR COUNTY	4,457	107,912
27	DODGE COUNTY	2,953	71,498
28	DOOLY COUNTY	1,141	27,626
29	EARLY COUNTY	1,860	45,034
30	ECHOLS COUNTY	815	19,733
31	ELBERT COUNTY	2,895	70,093
32	EMANUEL COUNTY	3,928	95,104
33	EVANS COUNTY	1,815	43,945
34	FANNIN COUNTY	2,833	68,592
35	FRANKLIN COUNTY	3,572	86,485
36	GILMER COUNTY	4,035	97,695
37	GORDON COUNTY	6,228	150,792
38	GRADY COUNTY	4,442	107,549
39	GREENE COUNTY	2,451	59,343

	LEA	Eligible ADA	FY 22 Title V Allocation
40	HANCOCK COUNTY	736	17,820
41	HARALSON COUNTY	3,148	76,219
42	HART COUNTY	3,425	82,926
43	HEARD COUNTY	1,994	48,279
44	IRWIN COUNTY	1,611	39,005
45	JASPER COUNTY S	2,280	55,203
46	JEFF DAVIS COUNTY	2,883	69,803
47	JEFFERSON COUNTY	2,248	54,428
48	JENKINS COUNTY	1,063	25,737
49	JOHNSON COUNTY	1,045	25,301
50	LAMAR COUNTY	2,547	61,668
51	LAURENS COUNTY	6,261	151,591
52	LINCOLN COUNTY	1,046	25,326
53	LONG COUNTY	3,678	89,051
54	MACON COUNTY	1,109	26,851
55	MADISON COUNTY	4,831	116,968
56	MARION COUNTY	1,301	31,500
57	MCDUFFIE COUNTY	3,499	84,717
58	MERIWETHER COUNTY	2,307	55,857
59	MILLER COUNTY	816	19,757
60	MITCHELL COUNTY	1,270	30,749
61	MONTGOMERY COUNTY	833	20,169
62	OGLETHORPE COUNTY	2,076	50,264
63	PIERCE COUNTY	3,460	83,773
64	POLK COUNTY	7,688	186,141
65	PULASKI COUNTY	1,259	30,483
66	PUTNAM COUNTY	2,853	69,077
67	QUITMAN COUNTY	282	6,828
68	RABUN COUNTY	2,183	52,855
69	RANDOLPH COUNTY	712	17,239
70	SCHLEY COUNTY	1,219	29,514
71	SCREVEN COUNTY	2,190	53,024
72	SEMINOLE COUNTY	1,276	30,894
73	STEPHENS COUNTY	3,808	92,199
74	STEWART COUNTY	402	9,733
75	SUMTER COUNTY	4,161	100,746
76	TALBOT COUNTY	429	10,387
77	TATTNALL COUNTY	3,572	86,485
78	TAYLOR COUNTY	1,326	32,105

	LEA	Eligible ADA	FY 22 Title V Allocation
79	TELFAIR COUNTY	1,582	38,303
80	TERRELL COUNTY	1,162	28,134
81	THOMAS COUNTY	5,478	132,633
82	TIFT COUNTY	7,500	181,589
83	TOOMBS COUNTY	2,808	67,987
84	TOWNS COUNTY	921	22,300
85	TREUTLEN COUNTY	1,045	25,301
86	TROUP COUNTY	11,571	280,156
87	TURNER COUNTY	1,124	27,214
88	TWIGGS COUNTY	741	17,941
89	UNION COUNTY	2,746	66,486
90	THOMASTON-UPSON COUNTY	3,993	96,678
91	WARE COUNTY	5,820	140,913
92	WARREN COUNTY	603	14,600
93	WASHINGTON COUNTY	2,998	72,587
94	WAYNE COUNTY	5,093	123,311
95	WHEELER COUNTY	942	22,808
96	WHITE COUNTY	3,820	92,490
97	WILCOX COUNTY	1,152	27,892
98	WILKES COUNTY	1,338	32,396
99	WILKINSON COUNTY	1,164	28,183
100	WORTH COUNTY	3,022	73,168
101	CALHOUN CITY	4,002	96,896
102	DUBLIN CITY	2,137	51,741
103	PELHAM CITY	1,352	32,735
104	THOMASVILLE CITY	2,609	63,169
105	TRION CITY	1,287	31,161
106	VIDALIA CITY	2,410	58,351
	<b>Totals</b>	<b>289,510</b>	<b>7,009,591</b>

Source: FISCAL YEAR 2022 SPREADSHEET FOR SMALL, RURAL SCHOOL ACHIEVEMENT PROGRAM AND RURAL LOW-INCOME SCHOOL PROGRAM; Georgia Department of Education

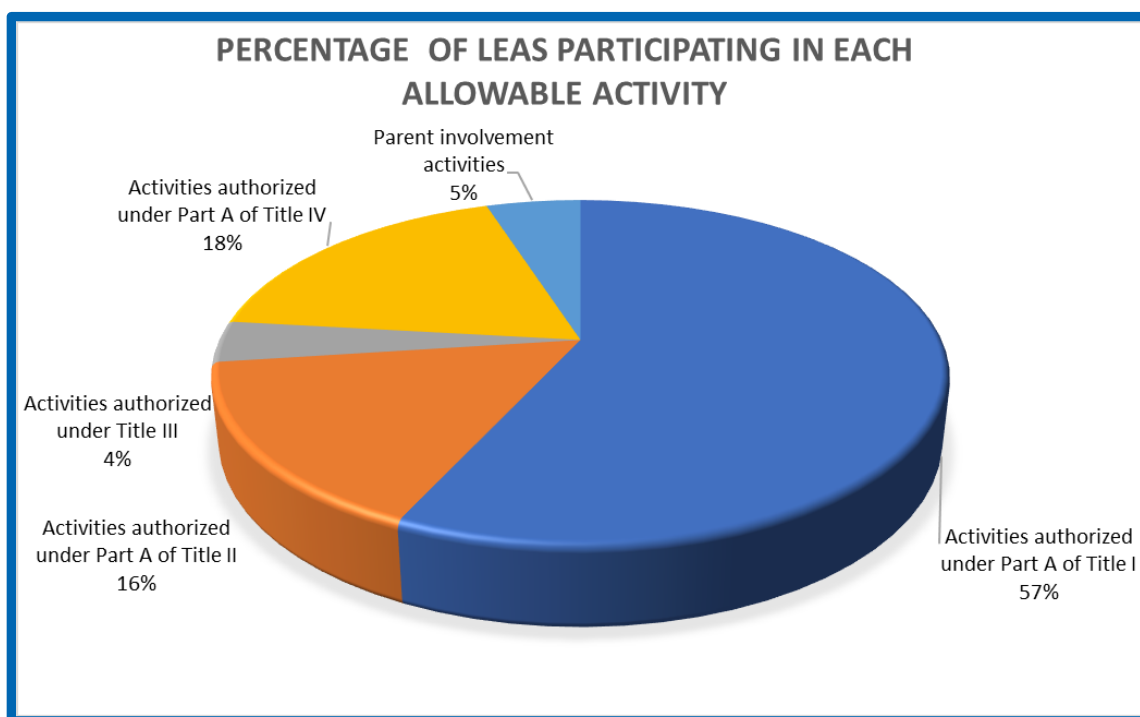
## Maintenance of Effort

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 FY 22, all LEAs met maintenance of effort.

## 2021-2022 Title V, Part B Expenditures

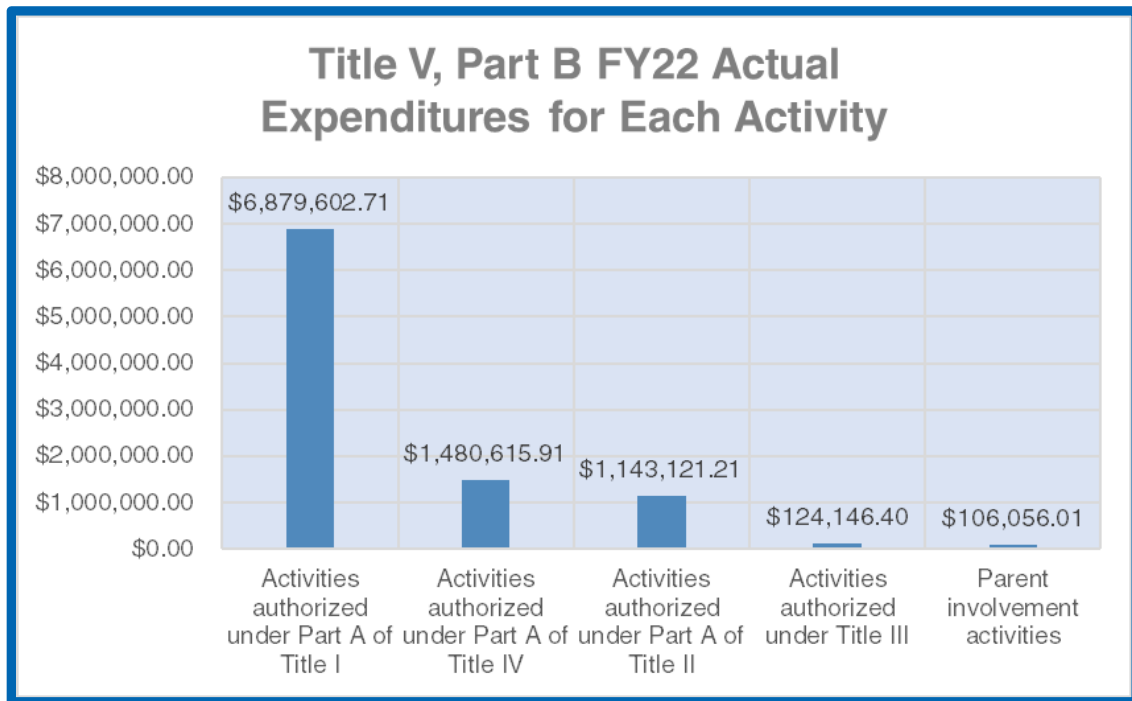
*Source: FY 23 Annual Evaluation Report submitted by LEAs*

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 FY 22. 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.

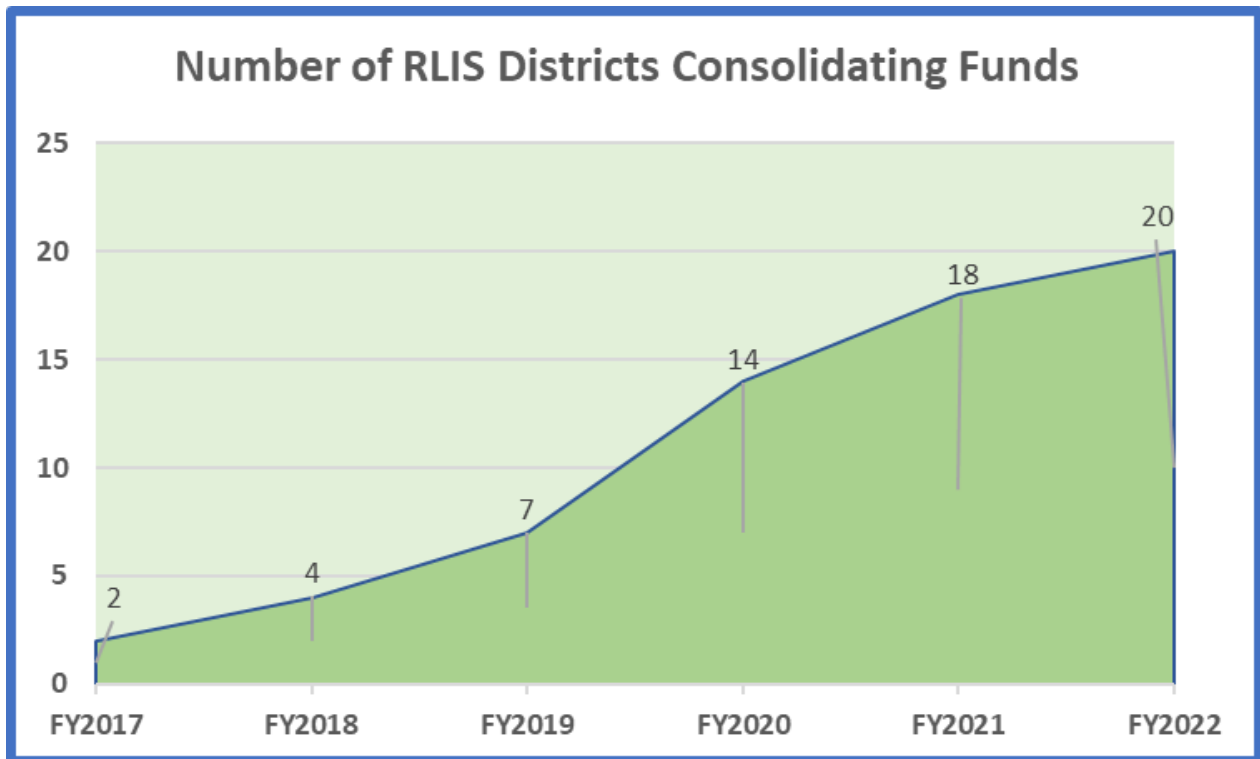


## Title V, Part B Consolidation of Funds

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 2021-2022

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.

<b>Number of RLIS Districts Participating in Transferring Funds Into Title V, Part B</b>	<b>Title II, Part A Funds Transferred Into Title V, Part B</b>	<b>Title IV, Part A Funds Transferred Into Title V, Part B</b>	<b>Total Funds Transferred Into Title V, Part B</b>
<b>25</b>	<b>\$2,320,152</b>	<b>\$1,823,757</b>	<b>\$4,143,909</b>

*Source: FY 22 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.

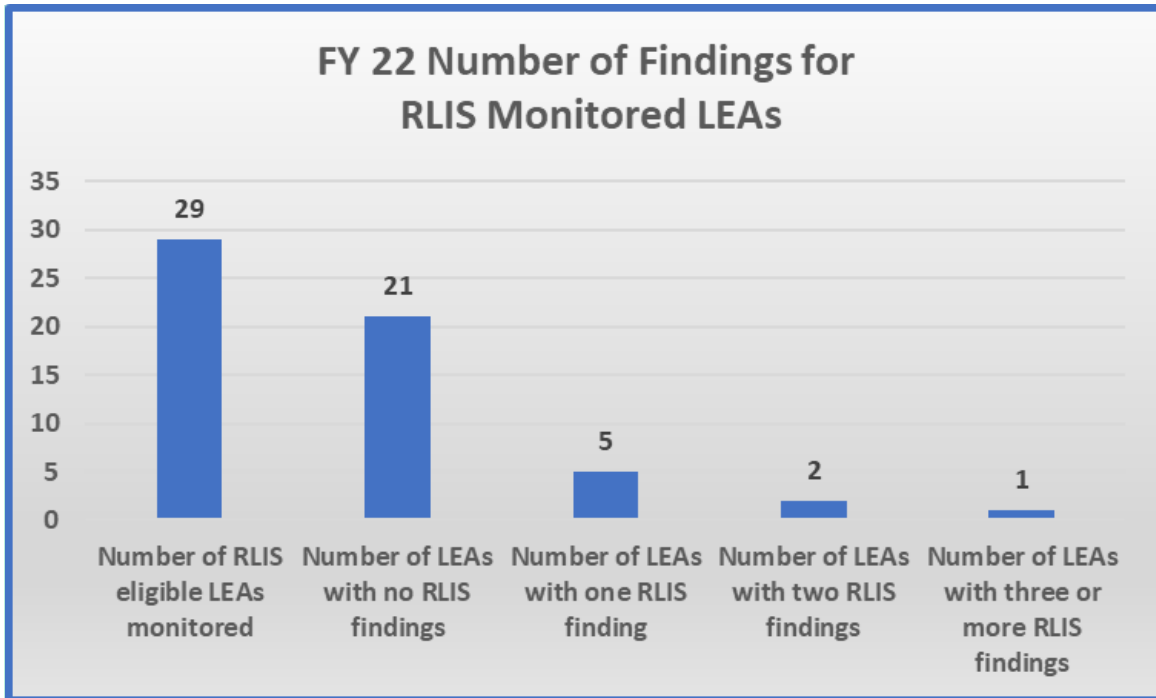
LEAs are monitored on a four-year cycle. Approximately one-fourth of the LEAs are monitored each year. As part of the annual review process in determining which LEAs are to be monitored, the Division of Federal Programs conducts a risk assessment using a combination of elements defined by GaDOE. An LEA's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

## 2021-2022 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. Following the FY 21 suspension of monitoring due to the FY 20 school closures, the regular monitoring cycle was reinstated in FY 22. The chart below addresses the FY 22 Cross Functional Monitoring cycle. The most common areas for findings are in expenditures and written internal control procedures. GaDOE staff commonly find errors in internal controls and lack of supporting documentation that illustrate compliance with statute and applicable regulations.



*Source: FY 22 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. Other findings included equipment management and cash management drawdown procedures. 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.