Interested in Consolidating in FY21?  
Here’s what you need to know.

Consolidation of Funds Webinar  
January 22, 2020
Consolidation of Funds Interest Webinar

Agenda

• Getting acquainted with Consolidation of Funds (Overview)
  • **New** Flexibility in Becoming a Schoolwide School
• Onboarding with Consolidation of Funds (Steps)
• Digging a Little Deeper
  • **New** - How to Consolidate the Parent and Family Engagement Set-Aside
• How to Join & Upcoming Trainings
• Feedback
Getting Acquainted with Consolidation of Funds
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At what level and point in the process does consolidation occur?

- State Education Agency
- Local Education Agency
- School
- Application for Funds
- LEA Allocations
- Set-Asides
- LEA Requirements
- Consolidation
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What rationale does the Federal Government give?

Over the years, SEAs and LEAs have initiated changes and innovations to increase the quality of instruction and improve academic achievement for all students. For an LEA implementing these reforms and innovations, it is essential to use Federal education funds effectively and efficiently. Operating a schoolwide program under Title I can be beneficial to LEAs and schools as they explore how to most effectively leverage their local, State, and Federal funds in order to promote school reforms and raise student achievement.

2016 Non-Regulatory Guidance
Consolidation of Funds Interest Webinar
What statutes, regulation, guidance apply to consolidation?

Federal Compliance
• Federal Law:
  • ESSA
  • IDEA
• Federal Regulations:
  • 2004 Federal Register
  • 34 CFR Part 200.25-29
  • 34 CFR 300.206
• Federal Guidance:
  • 2008 Fiscal Issues
  • 2016 Schoolwide Programs

State Compliance
• State Law:
  • Charter and Strategic Waiver (20-2-82, 20-2-2065)
  • Uniform Accounting System (20-2-320)
• State Guidance:
  • Consolidation of Funds Manual
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Does this mean the State is no longer involved?

State Responsibilities in Supporting Consolidation of Funds

- 34 CFR 76.700-702
  - SEAs and LEAs shall comply with the plan and applicable statutes, regulations, and approved applications.
  - SEAs and LEAs shall directly administer or supervise the administration of each project.
  - SEAs and LEAs shall use fiscal control and fund accounting procedures that insure proper disbursement of and accounting for Federal funds.

- 2 CFR Part 200.331
  - All pass-through entities must ensure subgrantees comply with
    - Collection of required financial and performance reports.
    - Monitoring the activities of the subrecipient to ensure that the subaward is used for authorized purposes and that subaward performance goals are achieved.

2016 Dear Colleague Letter to Georgia
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Flexibility should not be mistaken for complete freedom…
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Which programs does the Federal Government authorize for consolidation?

Title I authorizes the Secretary to permit schoolwide programs to consolidate funds from any other noncompetitive, formula grant program or any discretionary grant program administered by the Secretary and to exempt schoolwide program schools from many statutory and regulatory provisions of the programs whose funds are consolidated, if the intent and purposes of the programs are met. All consolidated funds and services must support the school’s schoolwide plan.

2004 Federal Register
Consolidation of Funds Interest Webinar

Programs Available for Consolidation in Georgia’s Initiative

- **STATE AND LOCAL FUNDS**
- **TITLE I, PART A** IMPROVING BASIC PROGRAMS
- **TITLE I, PART A** PARENT AND FAMILY ENGAGEMENT SET-ASIDE
- **TITLE I 1003(A)** SCHOOL IMPROVEMENT GRANTS (INCLUDES RURAL AND GSCI GRANTS)
- **TITLE I, PART C** EDUCATION OF MIGRATORY CHILDREN
- **TITLE I, PART D** SUBPART 2 ONLY - NEGLECTED & DELINQUENT
- **TITLE II, PART A** SUPPORTING EFFECTIVE INSTRUCTION
- **TITLE III, PART A** ENGLISH SUPPORT FOR ENGLISH LEARNERS
- **TITLE III, PART A** ENGLISH SUPPORT FOR IMMIGRANT STUDENTS
- **TITLE IV, PART A** STUDENT SUPPORT AND ACADEMIC ENRICHMENT (INCLUDES stART GRANT)
- **TITLE IV, PART B** 21ST CENTURY COMMUNITY LEARNING CENTERS
- **TITLE V, PART B** RURAL EDUCATION INITIATIVE
- **MCKINNEY-VENTO** EDUCATION FOR HOMELESS CHILDREN AND YOUTH
- **IDEA 611** SPECIAL EDUCATION FEDERAL FUNDS (FLOWTHROUGH)
- **IDEA 619** SPECIAL EDUCATION FEDERAL FUNDS (PRESchool)
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**New** Schoolwide Programs and Waiver

• SEC. 1114. [20 U.S.C. 6314] SCHOOLWIDE PROGRAMS.

(A) ELIGIBILITY.—A local educational agency may consolidate and use funds under Title I, Part A, together with other Federal, State, and local funds, in order to upgrade the entire educational program of a school that serves an eligible school attendance area in which not less than 40 percent of the children are from low-income families, or not less than 40 percent of the children enrolled in the school are from such families.

• (B) EXCEPTION.—A school that serves an eligible school attendance area in which less than 40 percent of the children are from low-income families, or a school for which less than 40 percent of the children enrolled in the school are from such families, may operate a schoolwide program under this section if the school receives a waiver from the State educational agency to do so, after taking into account how a schoolwide program will best serve the needs of the students in the school served under this part in improving academic achievement and other factors.
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**New** Schoolwide Programs and Waiver

**FY17-FY20 GA SCHOOLWIDE WAIVER**

➢ Georgia requires that the school’s poverty percentage must be at least 35% to be eligible for a schoolwide program waiver

➢ Waivers must be submitted annually. The District/School desiring a waiver for the upcoming year must apply by April 15th of the previous year using the “Application for Waiver – Schoolwide Poverty Threshold” found on the Title I website

**COMPONENTS OF GA SCHOOLWIDE WAIVER**

➢ Waiver Rationale – describe the need and rationale for waiver including why the need(s) can’t be met without a schoolwide program

➢ Attach a copy of the school’s Schoolwide Program Plan (SWP)

➢ Agree to Assurances
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**New** Schoolwide Programs and Waiver

SCHOOLWIDE WAIVERS IN OTHER STATES

- **Kansas** – does not have a minimum threshold but has rules that prevent districts from gaming the system within their district (Kansas uses their approved EdFlex Waiver for the Schoolwide waiver process)
- **Pennsylvania** – does not have a minimum threshold and can apply through their “Intent to Plan” form
- **Massachusetts** - does not have a minimum threshold and uses their approved EdFlex Waiver for the Schoolwide waiver process
- **Washington** – does not have a minimum threshold but must serve one year as a Targeted Assistance Program (TAP) and then can become Schoolwide if the TAP was successful (Washington has an application that schools/LEAs must submit only once)
- **Wisconsin** – does not have a minimum threshold but must apply for a waiver, submit a Schoolwide Plan, and meet schoolwide requirements
GA’s SCHOOLWIDE WAIVER FOR 2021

➢ Georgia is considering offering the Schoolwide waiver without a minimum poverty threshold

➢ Targeted Assistance Programs may become Schoolwide

➢ Schools below the 40% poverty level may become Schoolwide

➢ Schools must still have a year planning to become schoolwide unless prior approval is granted by Title I, Part A at GaDOE

➢ Schools must develop a Schoolwide Plan that must include all the Schoolwide components found in ESEA Section 1114

➢ Waiver applications are available on the Federal Programs/Title I/ Schoolwide Programs website located here.
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Why consolidate?

Students
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Do you still have to serve subgroups?

• This authority affords a schoolwide program school significant flexibility to better serve all students by improving the entire instructional program, rather than only providing separate services to specific target populations.

• The Secretary emphasizes that a school operating a schoolwide program must address the needs of all students in the school, particularly the needs of the lowest-achieving students who are members of the target population of any program that is included in the schoolwide program.

2004 Federal Register
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What are the benefits?

✓ Better serve all students by improving the entire instructional program, rather than only providing separate services to specific target populations.

✓ Change the role of central office staff from a federally required emphasis on compliance to a federally promoted emphasis on service and support.

✓ Leverage one funding source more freely to implement one schoolwide plan.

✓ Empower principals to manage the funds supporting the reforms in their school.

✓ Remove time-consuming administrative tasks.

✓ Remove the allowability barriers that are often still in place when braiding funds.
The Process for Onboarding with Consolidation of Funds
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Three Main Components

- Needs Assessment
- Plan for Implementation
- Monitoring for Effectiveness
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Step 1: Confer with Your Stakeholders about Consolidation

REQUIRED STAKEHOLDERS

- Superintendent
- Finance Director
- Federal Programs Director
- Principals
- Bookkeepers
- Data Collections Coordinators
- Parents
- Private Schools (if transferring)
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Step 2: Decide Which Schools Will Consolidate

CONSIDERATIONS

• Is it best for students?
• Title v Non-Title Schools
• District Initiatives
• Pilot schools v All Schools
• Current challenges & opportunities in schools
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Step 3: Decide How to Allocate Funds to Each School

CONSIDERATIONS

• Maintain a Resource Allocation Methodology Plan
  o Comparability remains in place for some districts
  o Supplement not supplant remains in effect for all districts

• Prioritize Program Funds to Certain Students
  o Low Achieving, High Poverty, Migrant, EL, etc.

• Transfer Funds Prior to Consolidating (Title II, Part A and Title IV, Part A)
  o Ensures a more streamlined administration of consolidation
  o Does not restrict schoolwide schools from implementing any activities that were authorized under those programs
  o Transferring 100% may negatively impact schools that are not schoolwide
  o Carryover: Title I (15%), IC (SEA), IIA (100%), IIIA (100%) IV (focus areas), VB (100%)
  o Impact on Private School Partnerships
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Step 3: Decide How to Allocate Funds to Each School

CONSIDERATIONS

• District Initiatives
  o What district expenditures can be allocated to schools that would benefit from being managed by principals (software licenses, personnel with set schedules)

• Training and Support
  o Do all bookkeepers have the training required for payroll and chart of accounts?
  o Do principals understand what constitutes meeting the intent and purpose? Do they know what documentation should be kept to show implementation and effectiveness of the schoolwide plan?
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Step 4: Decide Which Programs to Consolidate at Each School

- **State and Local Funds**
- **Title I, Part A** Improving Basic Programs
- **Title I, Part A** Parent and Family Engagement Set-Aside
- **Title I 1003(A)** School Improvement Grants (Includes Rural and GSCI Grants)
- **Title I, Part C** Education of Migratory Children
- **Title I, Part D** Subpart 2 Only - Neglected & Delinquent
- **Title II, Part A** Supporting Effective Instruction
- **Title III, Part A** English Support for English Learners
- **Title III, Part A** English Support for Immigrant Students
- **Title IV, Part A** Student Support and Academic Enrichment (Includes stART Grant)
- **Title IV, Part B** 21st Century Community Learning Centers
- **Title V, Part B** Rural Education Initiative
- **McKinney-Vento** Education for Homeless Children and Youth
- **IDEA 611** Special Education Federal Funds (Flowthrough)
- **IDEA 619** Special Education Federal Funds (Preschool)
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Step 4: Decide Which Programs to Consolidate at Each School

CONSIDERATIONS

• Program Eligibility
  o Which programs are available in each school?

• School Initiatives
  o How will consolidation support the school’s initiatives and subgroups?

• District Initiatives
  o Are some school’s plans set up to implement certain initiatives?
  o Will the GaDOE LUA Chart of Accounts Function codes allowed in Fund 150 allow all initiatives to be implemented?
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### Formula Grants

- **SWP Components**
- **Intents and Purposes**
  - Title I, Part A
  - Title I, Part D – Subpart 2
  - Title II, Part A
  - Title III, Part A EL
  - Title III, Part A Immigrant
  - Title IV, Part A
  - Title V, Part B

### Discretionary & Competitive Grants

- **SWP must reflect State Plan**
  - Title I, Part C (Implementation Plan)
- **SWP must reflect Application**
  - Title I – SIG 1003(g) (Grant App.)
  - Title IV, Part B – 21st CLCC (Grant App.)
  - McKinney- Vento (Grant App.)
- **SWP must reflect Statute**
  - Title I – SIG 1003(a)
  - IDEA 611 & 619
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Step 5: Prepare a Timeline

• Fall (October – December):
  • Meet with Internal Stakeholders

• Spring (January-February):
  • Meet with External Stakeholders (parents)
  • Review FY20 CLIP, School Needs and School and District Initiatives, and plans to transfer IIA/IVA to Prepare Updates For FY21 CLIP & Intent to Participate
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Step 5: Prepare a Timeline

• Spring (March-June):
  • Assert Intent to Transfer IIA/IVA if applicable (during CLIP process)
  • Prepare total district budget for local board of education – including budget for Fund 150
  • Submit FY21 CLIP (Due July 30th but preferred before end of June) & Migrant Plan (if applicable)
  • Submit Intent to Participate (Due in April)
  • Set-up Fund 150 Accounts and adjust payroll for individuals who will be consolidated
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Step 5: Prepare a Timeline

• Spring (March-June):
  • Read consolidation of funds materials
  • Begin to update internal controls
  • Update Schoolwide Plan Template
  • Introduce Intent and Purpose Form

• May/June
  • Finance Director must attend first Cohort Meeting following an FY21 Financial Review Session
  • Federal Programs Director must attend first Cohort Meeting
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What does Year 1 of Consolidation of Funds Implementation look like?

• **May/June – Meeting 1** (Federal Programs/Finance)
  - Large Group - Verification of what should be complete by June; next steps with a specific focus on July – September; Q&A

• **September – Meeting 2** (Federal Programs/Finance/Select Principals)
  - Large Group - Verification of what should be complete by September; next steps with a specific focus on September – February; Q&A

• **February/March – Meeting 3** (Superintendent/Federal Programs/Finance/Select Principals)
  - District Specific- Verification of what should be complete by February/March; Review of Expenses and Schoolwide Plans; next steps with a specific focus on March – June; Q&A

• **June – Meeting 4** (Federal Programs/Finance)
  - Large Group - Verification of what should be complete by June; next steps with a specific focus on growth/expansion and CFM Monitoring; Q&A
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Each State educational agency (SEA) must encourage schools to consolidate funds from Federal, State and local sources in their schoolwide programs, and must modify or eliminate State fiscal and accounting barriers so that these funds can be more easily consolidated.

2004 Federal Register

GaDOE Supports Consolidation

- Initiated a state initiative to support consolidation
- One year of structured technical assistance
- Added many federal funding sources
- Created ability to report in Fund 150
- ConApp budget is 1000 881 (may use multiple functions if LEA wants)
- Completion report matches ConApp budget function/object
- Allow monthly or yearly adjustments
- Defer CFM in first year of joining consolidation cohort
Digging a Little Deeper

A Look at Consolidating Parent and Family Engagement
Consolidation of Funds Interest Webinar
Consolidating the Parent and Family Engagement Set-aside in FY21

**District Set-Asides**
- Use the exact titles (all caps), below, to consistently name set-asides and add to the beginning of budget detail descriptions.
- **Required Set-asides:**
  - N&D SET-ASIDE
  - HOMELESS SET-ASIDE
  - 1% PARENT INVOLVEMENT SET-ASIDE
  - PRIVATE SCHOOL EQUITABLE SERVICES SET-ASIDE
- **Optional Set-asides:**
  - ADMINISTRATIVE SET-ASIDE
  - ADDITIONAL PARENT AND FAMILY ENGAGEMENT SET-ASIDE
  - PARENT AND FAMILY ENGAGEMENT CARRYOVER SET-ASIDE
  - INDIRECT COST SET-ASIDE
  - AUDIT COST SET-ASIDE
  - PRIVATE SCHOOL EQUITABLE SERVICES CARRYOVER SET-ASIDE
  - EXTENDED LEARNING SET-ASIDE
  - PROFESSIONAL LEARNING SET-ASIDE
  - SCHOOL IMPROVEMENT INITIATIVES SET-ASIDE
  - SUPPLEMENTAL EL-LANGUAGE SUPPORT SET-ASIDE
  - FOSTER CARE TRANSPORTATION SET-ASIDE
  - CONSOLIDATION OF ADMINISTRATIVE FUNDS SET-ASIDE

**Required District Set-Asides**
- **1% Parent and Family Engagement Set-Aside**
  - A district with a Title I, Part A allocation greater than $500,000 must reserve at least one percent of its allocation for parent and family engagement activities.
  - If a transferability option is utilized, the 1% Parent and Family Engagement set-aside must be recalculated to reflect the increase in the Title I budget if the total amount with transferred funds exceed $500,000.

---

The 1% is a federally mandated LEA set-aside for LEA schools. The set-aside occurs prior to consolidation.

Transferring Title II, Part A and/or Title IV, Part A into Title I, Part A impacts the calculation of the 1%.
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Consolidating the Parent and Family Engagement Set-aside in FY21

Required District Set-Asides

- 1% Parent and Family Engagement
  - At least 90 percent of the required one percent set-aside must be distributed among the district’s Title I schools unless a school or all schools in the district decide to use their share of the reservation to support a district-level activity for parents
  - If a school or all schools decide to give their share to support a districtwide activity the Districtwide Parent Activity-Project Assurance form, signed by each participating principal, must be attached to the Title I Attachments tab of the Consolidated Application

If fully consolidating, schools would not need to complete the Districtwide Parent Activity-Project Assurance Form.

FIRST: Calculate the federally mandated set-aside.

The 90% of the 1% must be distributed among the District’s Title I schools

SECOND: Schools determine set-aside use.

Option 1: Do not consolidate. Keep as a separate funding source at school level to support school activities or LEA level to support a district activity.

Option 2: Consolidate a partial amount. The remainder is kept as a separate funding source at school level to support school activities or LEA level to support a district activity.

Option 3: Consolidate the full amount.
Under Consolidation, the amount distributed for each school should be indicated in the Parent Involvement column on the School Allocation page.

Title I instructions for completing the School Allocation page must continue to be followed when consolidating.
## Consolidation of Funds Interest Webinar

Consolidating the Parent and Family Engagement Set-aside in FY21

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Consolidating the Parent and Family Engagement Set-aside in FY21

• Carryover
  ➢ The portion of the one percent required set-aside for parent and family engagement not expended at the end of the previous year (FY20) must be carried over to the present fiscal year (FY21) and added as a custom optional set-aside entitled Parent and Family Engagement Carryover Set-Aside. Keep documentation of the calculation for carryover on file for monitoring.
  ➢ A custom optional set-aside entitled, Parent and Family Engagement Carryover Set-Aside, must be created. The amount and description must reflect one of the following situations:
    ▪ 100% of required parent and family engagement set-aside was expended. (Enter $0 for the amount of the set-aside).
    ▪ The Parent and Family Engagement Carryover amount of $_____ will be budgeted as a carryover amendment with zero dollars budgeted at this time.

• Additional Funds
  • If the LEA sets aside more than the required one percent for parent and family engagement, the additional funds should be listed as a separate set-aside with an explanation of the additional initiatives to be funded. This set-aside is entitled: Additional Parent and Family Engagement Set-Aside.
### Consolidation of Funds Interest Webinar

#### Consolidating the Parent and Family Engagement Set-aside in FY21

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<th>Traditional/Unconsolidated</th>
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<td>1000-881</td>
<td>level (8010).</td>
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Whether consolidated fully, partially, or not at all, the Parent and Family Engagement Set-Aside and the Parent and Family Engagement Set-Aside carryover may be budgeted in the Consolidated Application Title I, Part A budget 1) in total or 2) school by school.
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Consolidating the Parent and Family Engagement Set-aside in FY21

• **CLIP** – No change

• **Fund 150 Allocation** – PFE Set-aside must be listed for each school

• **ConApp Budget** – Use 1000 881 if consolidating (in total or by school)

• **Fund 150 Budget** – Must be included in total amount

• **Intent and Purpose Statements** – Must be included on a separate line

• **Schoolwide Plan** – action steps must be evident and align with I & P
Want to Join?
Have more Questions?

Offering a holistic education to each and every child in our state.
Consolidation of Funds Interest Webinar
Next Training Opportunity

<table>
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<th>Description</th>
<th>A hands-on preparation workshop for school districts ready to commit to FY21 Consolidation of Funds.</th>
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<td>March 18, 2020, 9:00-12:00 PM</td>
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<tr>
<td>Location</td>
<td>Clayton County Schools, S Truett Cathy Professional Learning Center 1087 Battle Creek Rd, Jonesboro, GA 30236</td>
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<tr>
<td>Audience</td>
<td>District Superintendents (or designee), Finance Director and Federal Programs Director</td>
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Open your Camera app and point it steady for 2-3 seconds towards the QR Code. Open link when prompted.
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Join Cohort 5

Georgia Department of Education
Consolidation of Funds FY21 Interest Form

Submission of this form expresses the LEA's interest in participating in the Consolidation of Funds Initiative (fifth cohort) for the 2020-2021 school year.

Deadline: April 30th, 2020

The following criteria apply to all LEAs involved in the Initiative:
- Only Title I schoolwide schools can participate in the Consolidation of Funds Initiative.
- At least one federal program must be combined with state and local funds in order to participate.
- LEAs decide which schools will consolidate funds and which federal programs' funds will be consolidated.
- LEAs agree to abide by the guidelines set forth in the Consolidation of Funds Manual.
- LEAs that are designated by the GaDOE as high risk for FY19 are ineligible to participate in the Program.

LEAs expressing interest by submitting this form will be contacted to discuss, either face-to-face or via webinar, their readiness to be involved with the Consolidation of Funds Program. The GaDOE reserves the right to make the final determination as to which LEAs are accepted into the fourth cohort for 2020-2021. Completion of this form is not a guarantee of acceptance into the Consolidation of Funds Initiative, nor does it obligate the LEA to participate. LEAs will be notified within three weeks of completion of this form as to their participation in the Program.

A Consolidation Participation form identifying schools and programs will be emailed to school district contacts in May 2020.

If you have any questions, contact GaDOE Consolidation Staff consolidation@oe.k12.ga.us.

http://tiny.cc/51rbcz
Consolidation of Funds Interest Webinar

Consolidation@doe.k12.ga.us

Was this session helpful? Let us know what you think.

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