

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



Consolidation of Funds Webinar
October 8, 2019

Consolidation@doe.k12.ga.us

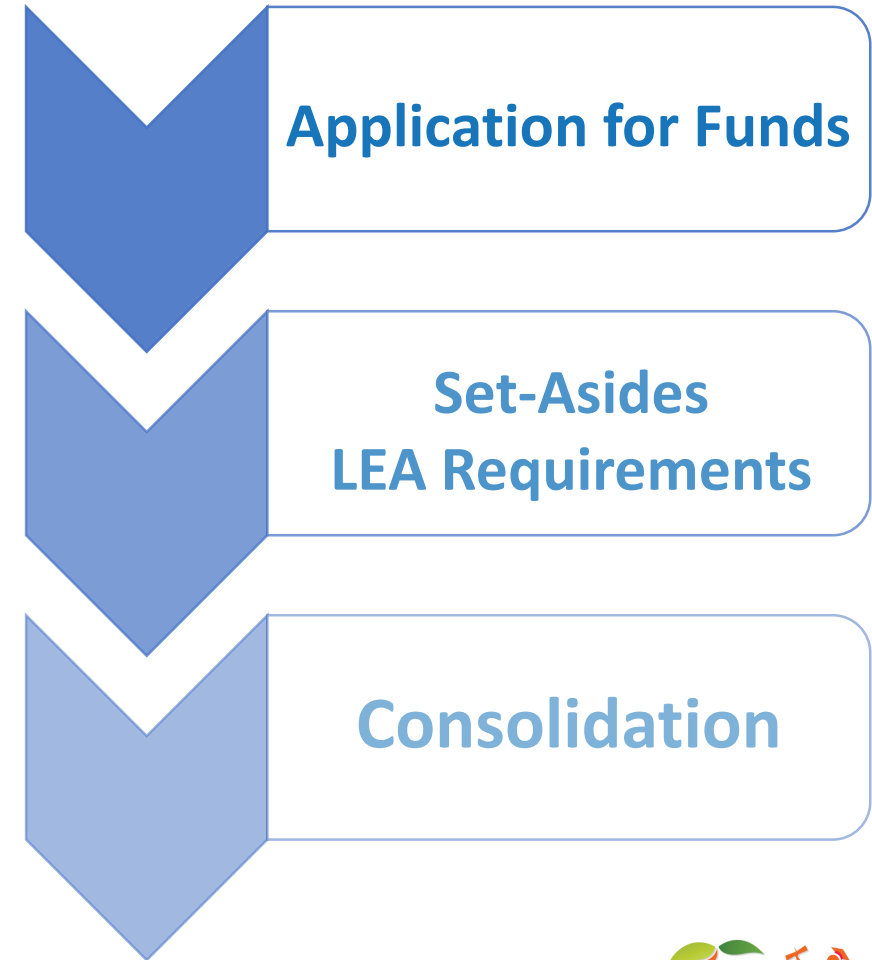
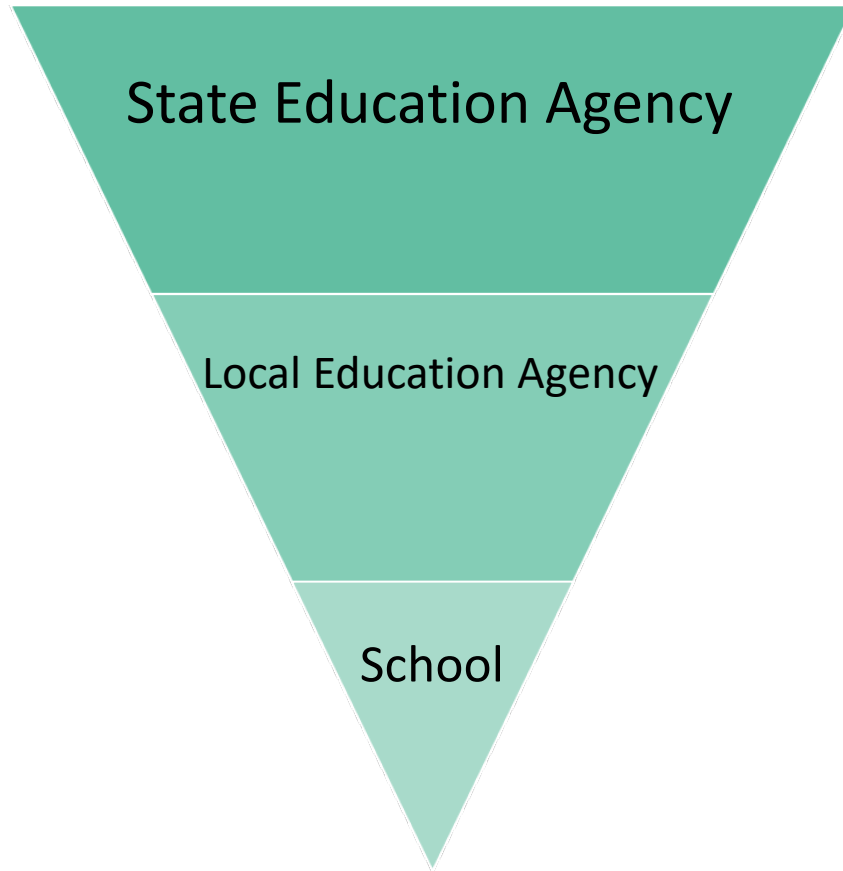
Richard Woods, Georgia's School Superintendent | Georgia Department of Education | *Educating Georgia's Future*



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- What is consolidation?
- Application Laws, Regulations and Guidance
- GaDOE's Responsibilities
- Stakeholders
- Process
- Programs
- Resources
- Training Opportunities

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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

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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

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- 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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Needs
Assessment

Plan for
Implementation

Monitoring for
Effectiveness

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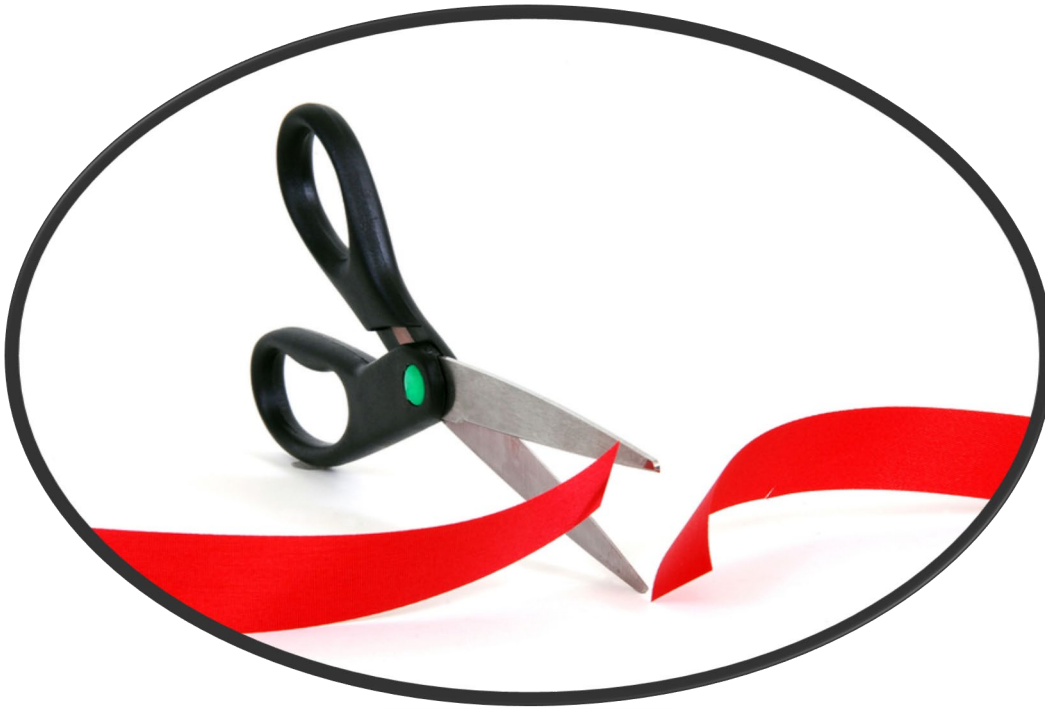
Federal Compliance

- 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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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

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- 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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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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Why consolidate?



Students

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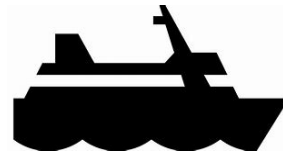
- ✓ Better serve all students by improving the entire instructional program, rather than only providing separate services to specific target populations.
- ✓ Change the role of central office staff from a federally required emphasis on compliance to a federally promoted emphasis on service and support.
- ✓ 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.

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Flexibility should not be mistaken for complete freedom...



Traditional Methods – Bridge
Single path, Single car at a time,
Single Point of Entry



Consolidation Methods – Ferry
Multiple paths, Multiple cars at a time,
Multiple Points of Entry



Complete Freedom– Helicopter
Ditch the car
Land anywhere



IMPLEMENTING THE PLAN



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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

- Resource Allocation Methodology Plan
 - Comparability remains in place for some districts
 - Supplement not supplant remains in effect for all districts
- Program Restrictions

Several programs require that funds typically allocated at the district level take student subgroup populations and student academic performance into consideration when determining how to allocate to schools
- Transferring Funds (Title II, Part A and Title IV, Part A) prior to consolidating
 - Ensures a more streamlined administration of consolidation
 - Does not restrict schoolwide schools from implementing any activities that were authorized under those programs
 - Transferring 100% may negatively impact schools that are not schoolwide
 - 85% Title I Carryover Restriction
 - Impact on Private School Partnerships

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Step 3: Decide How to Allocate Funds to Each School

CONSIDERATIONS

- District Initiatives


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

- Do all bookkeepers have the training required for payroll and chart of accounts?
- 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



Consolidation of Funds for Title I Schoolwide Schools
(2019-2020)

The following federal funds are available for consolidation under the Initiative:

- Title I, Part A – Improving Basic Programs Operated by Local Educational Agencies
- Title I 1003(a) - School Improvement Grant (amended by ESSA to include new set-asides and authority for new subgrants to LEAs- ends 9/30/21)
- Title I 1003(g) – School Improvement Grant (eliminated under ESSA, though current programs will continue until the end of the grant period)
- Title I, Part C – Education of Migratory Children
- Title I, Part D (Subpart 2 only) – Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent or At-Risk
- Title II, Part A – Supportive Effective Instruction
- Title III, Part A – English Language Acquisition, Language Enhancement, and Academic Achievement Act (Includes Grants for English Support and Immigrant Students)
- Title IV, Part A – Student Support and Academic Enrichment
- Title IV, Part B – 21st Century Community Learning Centers
- Title V, Part B – Rural Education Initiative
- McKinney-Vento – Education for Homeless Children and Youth
- Special Education Federal Funds – IDEA 611 and 619

The following special allotments may not be consolidated in a schoolwide consolidation fund:

- Special Education State Funds
- Bilingual Education Allotment
- Career and Technology Education Allotment

Districts will establish a consolidated schoolwide pool for each school that is consolidating funds as part of the schoolwide program. This pool should be based on those expenditures that are in support of the following seven functional categories:

- 1000 – Instruction
- 2100 – Pupil Services
- 2210 – Improvement of Instructional Services
- 2213 – Instructional Staff Training
- 2220 – Educational Media Services
- 2400 – School Administration
- 2700 – Transportation (Supplemental academic services only- for example field trips, after school programs such as tutoring, summer programs and work placement)

Underlined funds and functional categories are newly added for the 2019-2020 school year.

- State and Local Funds
- Title I, Part A – Improving Basic Programs
- Title I 1003(a) – School Improvement 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
- Title IV, Part B – 21st Century Community Learning Centers
- Title V, Part B – Rural Education Initiative
- McKinney-Vento – Education for Homeless Children and Youth
- Special Education Federal Funds – IDEA 611
- Special Education Federal Funds – IDEA 619 Preschool

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Step 4: Decide Which Programs to Consolidate at Each School

CONSIDERATIONS

- Program Eligibility
Which programs available in which schools?
- School Initiatives
How will consolidation support the school's initiatives and subgroups?
- District Initiatives
 - Are some school's plans set up to implement certain initiatives?
 - Will the COA 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 (prior to CLIP)
 - 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
 - Read consolidation of funds materials
 - Begin to update internal controls

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What does Year 1 of Consolidation of Funds Implementation look like?

- **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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Next Training Opportunity

October 22, 2019, 9:00-12:00 PM
Georgia Department of Education
15th Floor Training Room



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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@doe.k12.ga.us.



<http://tiny.cc/51rbcz>

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