Consolidating in FY21

GCEL 2020
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Georgia’s Continuous Improvement Process
GCEL - Consolidation of Funds

USDE On Consolidation

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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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.

✓ Alleviate time-consuming administrative tasks (time and effort time logs, inventory).

✓ Remove the allowability barriers that are often still in place when braiding funds.
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Cohort 4 Feedback On Consolidation

• We can finally purchase all parts of our curriculum – materials for students, materials for teachers, and PD for teachers.
• It is so nice to be able to say ‘yes’ instead of ‘no’.
• The money can be used in non-traditional ways to meet the pressing needs of students.
• Ability to think outside the box and know I will hear ‘yes’.
• This way of monitoring makes more sense than the old way.
• I love being able to schedule staff (paraprofessionals, coaches, interventionists) the way I need them to be used.

• All our money is closer to the students than it ever has been.
• Principals feel increased ownership and accountability for purchases – ‘is that coming out of my budget?’
• We can change our practices right now to meet the needs of students.
• We can rest assured that the SWP is being implemented with fidelity.
• We are finally able to fund supplies and training for teachers and areas that have long been neglected.
• The teachers and students have noticed a difference and climate has improved.
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State Education Agency

Local Education Agency

School

Application for Funds

LEA Allocations

Set-Asides
LEA Requirements

Consolidation
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Federal & State Compliance

Federal Accountability

• 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 Accountability

• 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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State Responsibilities

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 with a purpose…
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Customizing Consolidation

• Determine which/how many schools will consolidate.
• Determine which programs will be consolidated.
• Determine how much will be contributed from each source.
• Determine if/which staff will be paid from Fund 150.
• Determine what the planning and implementation process will look like.
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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 VI, 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
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**New** Schoolwide Programs and Waiver

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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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
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
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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

Consolidating in FY21

• March
  • Meet with Internal & External Stakeholders
  • Attend March 18 Training in Atlanta
  • Set-Up Fund 150 Account

• April - June
  • Include Fund 150 in LEA Budget to Local BOE
  • Attend June Cohort 5 Meeting 1

Consolidating in FY22

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

• Spring (January-February):
  • Meet with External Stakeholders (parents)
  • Review FY21 CLIP, School Needs and School and District Initiatives, and plans to transfer IIA/IVA to Prepare Updates For FY22 CLIP & Intent to Participate
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Step 5: Prepare a Timeline

• To Do:
  • Assert Intent to Transfer IIA/IVA if applicable (during CLIP process)
  • Prepare total district budget with Fund 150 for local board of education
  • Submit FY21 CLIP & Migrant Plan (if applicable)
  • Submit Intent to Participate (Due in April)
  • Set-up Fund 150 Accounts and adjust payroll for individuals paid out of Fund 150
  • Read consolidation of funds materials
  • Begin to update internal controls
  • Update Schoolwide Plan Template
  • Introduce and Complete an Intent and Purpose Form
  • 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

• **November – Principal Meeting** (Select Principals)
  • Small Group Regional Meeting- Highlighting best practices and innovative practices for principals involved in Consolidation of Funds Initiative

• **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
Want to know how it’s going? Ask one of our cohort LEAs

**Cohort 1:**
Calhoun City, Cartersville City, Foothills Charter, Madison

**Cohort 2:**
APS, Dougherty, Long, Marietta City, Mitchell

**Cohort 3:**
Berrien, Bryan, Clarke, Coweta, Effingham, Fulton, Gainesville City, Lamar, Richmond, Scintilla Charter, Tattnall, Walker

**Cohort 4:**
Atkinson, Barrow, Ben Hill, Du Bois Charter, Griffin-Spalding, Miller, Montgomery, Muscogee, Oglethorpe, Stephens, Terrell
Want to Join?
Have more Questions?

Offering a holistic education to each and every child in our state.
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<th><strong>Consolidation of Funds Initiative FY21 Prep Workshop</strong></th>
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<td><strong>Description</strong></td>
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A hands-on preparation workshop for school districts ready to commit to FY21 Consolidation of Funds. |
| **Date/Time**                                          |
March 18, 2020, 9:00-12:00 PM |
| **Location**                                           |
Clayton County Schools, S Truett Cathy Professional Learning Center 1087 Battle Creek Rd, Jonesboro, GA 30236 |
| **Audience**                                           |
District Superintendents (or designee), Finance Director and Federal Programs Director |

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Join Cohort 5

http://tiny.cc/51rbcz
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Please use the QR code to complete an evaluation of this session.