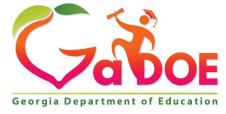


# Consolidating in FY21

GCEL 2020
Carly Covic Ambler
consolidation@doe.k12.ga.us



### 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



INITIATED CHANGES AND INNOVATIONS

**INCREASE THE QUALITY OF INSTRUCTION** 

IMPROVE ACADEMIC ACHIEVEMENT FOR ALL STUDENTS

**USE FEDERAL EDUCATION FUNDS EFFECTIVELY AND EFFICIENTLY** 

EFFECTIVELY LEVERAGE THEIR LOCAL, STATE, AND FEDERAL FUNDS



## GCEL - Consolidation of Funds 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.



## GCEL - Consolidation of Funds 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.



State Education Agency Local Education Agency School

**Application for Funds** 

**LEA Allocations** 

Set-Asides LEA Requirements

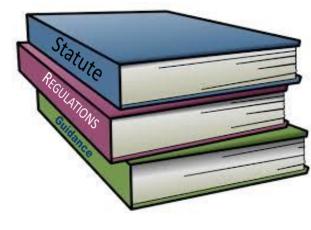
**Consolidation** 



## GCEL - Consolidation of Funds 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



## GCEL - Consolidation of Funds 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.

\$
CONSOLIDATION OF FUNDS INITIATIVE
\$

2016 Dear Colleague Letter to Georgia



### **GCEL - Consolidation of Funds** Flexibility with a purpose...



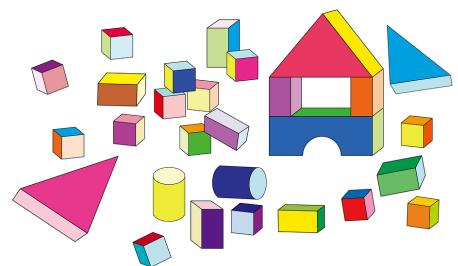






## GCEL - Consolidation of Funds Customizing Consolidation

- 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.





## GCEL - Consolidation of Funds Programs Available for Consolidation in Georgia's Initiative



#### Consolidation of Funds for Title I Schoolwide Schools

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

- Title I, Part A Improving Basic Programs Operated by Local Educational Agencies
  - o Title I, Part A Original
  - Title I, Part A Parent and Family Engagement Set-Aside (available in 2020-2021)
- Title I, 1003(a) School Improvement Grant
  - School Improvement Grant Original
  - o School Improvement Competitive Grant Rural Resource Grant
  - School Improvement Competitive Grant GA Systems of Continuous Improvement Grant
- Title I 1003(g) School Improvement Grant (sunsets September 2020)
- 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
  - Grants for English Learners
  - Grants for Immigrant Students
- Title IV, Part A Student Support and Academic Enrichment
  - Title IV, Part A Original
  - o Title IV, Part A Competitive E3 Grant
  - Title IV, Part A Competitive 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
- Special Education Federal Funds IDEA
  - IDEA 611 Flowthrough
- IDEA 619 Preschool

The following special allotments may <u>not</u> 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)

• 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)



### \*\*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 lowincome 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.



\*\*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



\*\*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



\*\*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



## GCEL - Consolidation of Funds 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





## GCEL - Consolidation of Funds Three Main Components

Needs Assessment Plan for Implementation

Monitoring for Effectiveness



### 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)





### **Step 2: Decide Which Schools Will Consolidate**

- Is it best for students?
- Title v Non-Title Schools
- District Initiatives
- Pilot schools v All Schools
- Current challenges & opportunities in schools









## GCEL - Consolidation of Funds Step 3: Decide How to Allocate Funds to Each School

- Maintain a Resource Allocation Methodology Plan
  - Comparability remains in place for some districts
  - Supplement not supplant remains in effect for all districts
- Prioritize Program Funds to Certain Students
  - Low Achieving, High Poverty, Migrant, EL, etc.
- Transfer Funds Prior to Consolidating (Title II, Part A and Title IV, Part A)
  - 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
  - Carryover: Title I (15%), IC (SEA), IIA (100%), IIIA (100%) IV (focus areas), VB (100%)
  - Impact on Private School Partnerships



## GCEL - Consolidation of Funds Step 3: Decide How to Allocate Funds to Each School

- 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
  - O 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?



## GCEL - Consolidation of Funds Step 4: Decide Which Programs to Consolidate at Each School



#### Consolidation of Funds for Title I Schoolwide Schools

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

- Title I, Part A Improving Basic Programs Operated by Local Educational Agencies
  - o Title I, Part A Original
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  - Grants for Immigrant Students
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  - o Title IV. Part A Original
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  - o Title IV, Part A Competitive start Grant
- Title IV, Part B 21<sup>st</sup> Century Community Learning Centers
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- 2220 Educational Media Services
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- 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)



## GCEL - Consolidation of Funds Step 4: Decide Which Programs to Consolidate at Each School

- 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
  - Are some school's plans set up to implement certain initiatives?
  - Will the GaDOE LUA Chart of Accounts Function codes allowed in Fund 150 allow all initiatives to be implemented?



#### **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



### GCEL - Consolidation of Funds 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



### GCEL - Consolidation of Funds 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



#### 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



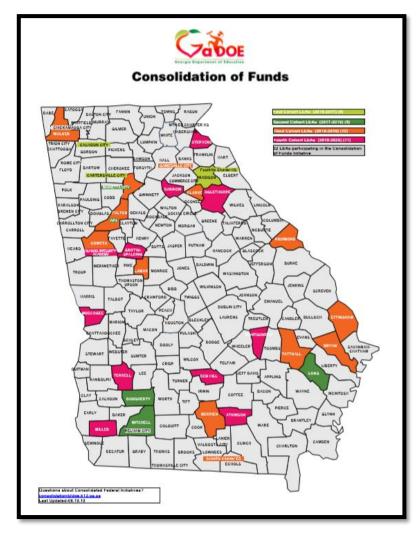
Each State educational agency (SEA) must encourage schools to consolidate funds from Federal, State and local sources in their schoolwide programs, and must modify or eliminate State fiscal and accounting barriers so that these funds can be more easily consolidated.

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?



## GCEL - Consolidation of Funds Next Training Opportunity

	Consolidation of Funds Initiative FY21 Prep Workshop
Description	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



Open your Camera app and point it steady for 2-3 seconds towards the QR Code. Open link when prompted.

https://bit.ly/37mekdG



## GCEL - Consolidation of Funds 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@doe.k12.ga.us



http://tiny.cc/51rbcz







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