

FY23 Cross Functional Monitoring Pre-Recorded Webinar Series

Overarching Indicators
September 23, 2022

Presenters



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Director
Division of Federal Programs



Carly Covic Ambler

Senior Program Manager
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Consolidation of Funds
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Dawna Hatcher

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Title IV, Part A

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Title I, Part A

Presenters



Malissa Roberts

Budgets and Grants Program Manager
Division of Special Education Services and Supports



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Program Specialist
Title I, Part A

Participant Guide

We will be following the most recent and updated version of the Cross Functional Monitoring (CFM) document from our website.

<http://www.gadoe.org/School-Improvement/Federal-Programs/title-i/Pages/Title%20Programs%20Monitoring.aspx>

Monitoring Resources

- Monitoring Cycles FY19 - FY23
- FY23 Cross Functional Monitoring Document

Please pause this recording and open the CFM document so that you can follow along.

Agenda

- Consolidation of Funds
- Overarching Indicator 1: Monitoring of Programs, Implementation, and Effectiveness
- Overarching Indicator 2: Consolidated LEA Improvement Plan (CLIP) and Schoolwide/Targeted Assistance Plan(s) (SWP/TAP)
- Overarching Indicator 3: Equitable Services
- Overarching Indicator 4: Maintenance of Effort and Comparability, Assessment Security, Reporting, ELP Assessment Participation
- Overarching Indicator 5: Internal Controls, Expenditures, Inventory, Drawdowns, Cost Principals

Overarching Requirement

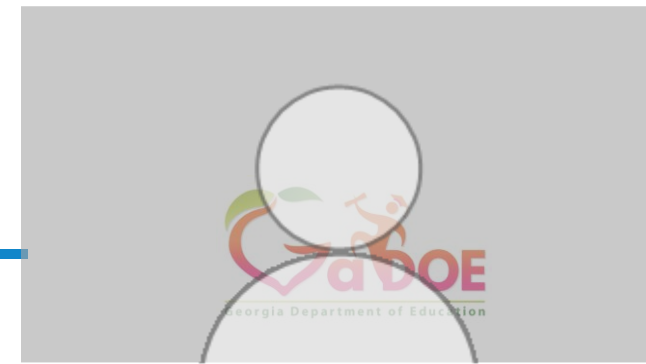
These overarching indicators apply to all federal programs being monitored.

- Each Federal program will review their program specific sections within the overarching requirement sections.
- Documentation for each program should be collected and organized in the overarching section files.
- Each program will determine compliance with their program specific requirements in that overarching section.

Consolidation of Funds

How the Consolidation of
State/Local and Federal Funds
Impacts Monitoring

Information for Cohorts 1-7



Monitoring Document Format Updated

- GaDOE has updated the monitoring documents with a column for ‘Notes about Consolidation of Funds’.
- Notes address what monitoring indicators are impacted by CoF specifying:
 - what is not checked,
 - what is added to review, and
 - what may be reviewed under different requirements.

NOTES ABOUT CONSOLIDATION OF FUNDS

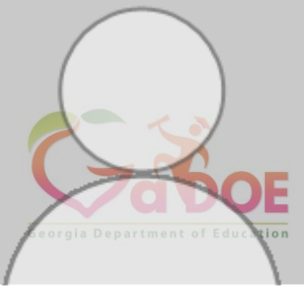
GaDOE Cross-Functional Monitoring Indicators 2022-2023

REQUIREMENTS	EVIDENCE OF IMPLEMENTATION	NOTES ABOUT TRANSFERRABILITY	NOTES ABOUT CONSOLIDATION OF FUNDS
1. LEA MONITORING OF PROGRAMS			
OVERARCHING REQUIREMENTS FOR ALL FEDERAL PROGRAMS			
<p>The LEA conducts monitoring of programs for both implementation and effectiveness of funded or unexpended activities at the LEA, school, and program levels to ensure compliance with Uniform Grant Guidance and Federal program requirements. (Title I, Part A; School Improvement 1003(a); School Improvement 1003(g); Title I, Part C, Title I, Part D; Title I, Part A; Title II; Part A; Title IV, Part A; Title X, Part B; Title IX, Part A; Addressing Violence Act; Coronavirus Aid, Relief, and Economic Security (CARES); Coronavirus Response and Supplemental Appropriations (CRRSA); American Rescue Plan (ARP); ESSER I, II, and III; and IDEA).</p> <p>IDEA: Sec. 1114(b)(9); Sec. 1004, Sec. 1306, Sec. 2104(c)(1); 20CFR 200.221, 21CFR 200.206, McKinney-Vento, Sec. 722(c)(2)(B); 20CFR 200.220 Non-Regulatory Guidance, State Evidence to Strengthen Education Investments (SEI).</p> <p>The LEA is implementing the FY23 LEA Equity Action Plan for the two equity gaps and each corresponding equity intervention selected for implementation.</p> <p>IDEA: 2002(d)(1)(B); Georgia Code: Title 66, Section 1111(b)(1)(B)(i); Section 1111(e)(2)(B)(4); Section 1111(e)(1);</p> <p>IDEA: Sec. 4105(a); 4104(c);</p> <p>IDEA: Sec. 4106(c)(1)-2; 4106(e)(2)(A)</p>	<p>Monitoring of program evidence shall include written procedures used to monitor all critical ESSA/IDEA requirements of all programs (Title I, Part A; School Improvement 1003(a); School Improvement 1003(g); Title I, Part C; Title I, Part D; Title I, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A; McKinney-Vento Act; IDEA; and CARES/CRRSA/ARPA) and its implementation at the district and schools (where applicable). These procedures will specify how the district will monitor each federal program to include:</p> <p>A. Steps the LEA will use to monitor and provide technical assistance for the implementation of all federal programs.</p> <p>B. Position(s) responsible for the implementation and monitoring.</p> <p>C. Frequency of monitoring (annual).</p> <p>D. Use of documentation that will be maintained to verify the Title programs have been monitored.</p> <p>E. Follow-up verification of corrective actions at schools and district (identified by the LEA).</p> <p>F. Review of applicable federal program budgets (development).</p> <p>G. Description the LEA uses to identify high-risk schools within the district.</p> <p>H. IDEA procedures to include: (1) Child Find, evaluation, eligibility and discipline.</p> <p>I. Procedures to include how the LEA monitors EL, emergent/well processes and Title II, Part A supplemental language instruction educational programs (LIEP), EL specific professional learning, EL parent/family/community outreach, and immigrant programs (when applicable).</p>	<p>Internal processes should include all federal programs for which the LEA received federal funds, even if programs transfer the funds to a different federal program.</p>	<p>Procedures are required for LEAs with CoF Schools</p> <ul style="list-style-type: none">• GaDOE will select a sample of CoF schools. For those schools the LEA will need to provide copies of the most recent schedule plans (SWP) and corresponding inter- and purpose (IP) statements. For competitive grants, GaDOE will need to approve grant application.• LEAs will provide LEA/school selected documentation demonstrating how the LEA carried out their procedures for monitoring critical ESSA/IDEA requirements of all consolidated programs and their implementation at sampled consolidating Title I school-site schools. <p>Program Specific Requirements</p> <ul style="list-style-type: none">• Title I, Part C shall include evidence of high quality and comprehensive programming and services provided during the school year and that address unique needs of migrant



Notes on Consolidation

A school that consolidates state, local and federal funds is not required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those particular program funds. It must, however, maintain records that demonstrate that the schoolwide program as a whole addresses the intent and purposes of each of the Federal education programs whose funds were consolidated to support it.



Notes on Consolidation

- Written Procedures
Grants come to LEAs and LEAs must have written procedures in place that are compliant with all federal regulations. In addition, some written procedures are impacted by consolidation.
 - Most written procedures will be checked outside of CoF
 - Cash Management (drawdown) procedures will be checked specifically for CoF
- Changes Under Fund 150
 - Required and Checked
 - Schoolwide Plan Implementation & Effectiveness & Corresponding Intent and Purpose
 - Drawdown EOY Drawdown with support & corresponding EOY Fund 150 Budget Allocations
 - GL to verify all allocations from Fund 150
 - Not Required and Not Checked
 - Time and Effort
 - Inventory
 - Expenditure Detail Packets

Notes on Consolidation

Evidence/Documentation

- GaDOE will select a sample of schools based on the size of the district and the grants consolidated.
- LEA/School Staff will curate (self-select) documents that support implementation and effectiveness of activities and interventions for each program. Activities and interventions may meet the intent and purpose of more than one program.
- Expenditure packets may be provided for evidence of implementation, but do not need to be.
- Programs predicated on the support of subgroups of students must be able to review subgroup performance, often relative to the performance of other students.
- GaDOE program staff will review documents and ask clarifying questions and request more information as needed.
- GaDOE CoF staff will be available at each monitoring visit to support LEA and GaDOE program staff as questions arise.

Notes on Consolidation

Common Misunderstandings

- Transfers and consolidation are not the same thing. Transfers occur prior to consolidation and the transferred funds take on the identity of the receiving grant. LEAs who transfer and consolidate do not need to meet the intent and purpose of transferred grants.
- Consolidation is not retroactive. LEAs may be required to meet program requirements, such as inventory, that precede consolidation if the program has been consolidated less than five years.
- Many monitoring requirements are not waived because they are LEA responsibilities that the LEA agreed to by accepting funding.

Consolidation of Funds Team



Carly Covic Ambler

Sr. Program Manager,
State Ombudsman
Consolidation of Funds
& Equitable Services



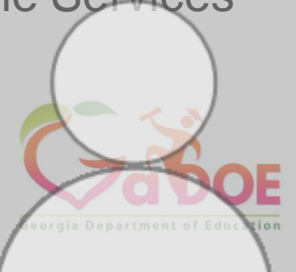
Scott James

Federal Programs Specialist
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Overarching Indicators

1.1 MONITORING OF PROGRAMS

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

The LEA conducts monitoring of its programs for both implementation and effectiveness of funded strategies/activities at the LEA, school, and program levels to ensure compliance with Uniform Grant Guidance and Federal program requirements. (Title I, Part A; School Improvement 1003(a); School Improvement 1003(g) (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A--McKinney-Vento Act; Coronavirus AID, Relief, Economic Security (CARES), Coronavirus Response and Supplemental Appropriations (CRRSA), American Rescue Plan (ARP) - ESSER I, II, and III; and IDEA).

[ESEA](#): Sec 1114(b)(3); Sec 1304; Sec. 1306; Sec. 2104(a)(1); [2 CFR 200.301](#), [34 CFR 300](#); [McKinney Vento Sec. 722\(c\)\(3\)\(E\)](#) [2CFR-200.329](#); [Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments \(2016\)](#)

The LEA is implementing its FY23 LEA Equity Action Plan for the two equity gaps and each corresponding equity intervention selected for improvement.

[ESEA](#): 2101(d)(2)(E), [Georgia EAEE](#); [ESEA](#): Sec. 1111(d)(1)(B)(vi), Section 1111(d)(2)(B)(iv), Section 1112(b)(1) [ESEA](#): Sec. 4105(a); 4104(a)(2); [ESEA](#): Sec. 4106(c)(1-2); 4106(e)(2)(A)

1.1 MONITORING OF PROGRAMS

Explanation – Evidence/Documentation (1.1A-C)

EVIDENCE OF IMPLEMENTATION

1. Monitoring of program evidence shall include written procedures used to monitor all critical ESEA/IDEA requirements of all programs (Title I, Part A; School Improvement 1003(a); School Improvement 1003; (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A - McKinney-Vento Act; IDEA; and CARES/CRRSA/ARP) and its implementation at the district and schools (where applicable). These procedures will specify how the district will monitor each federal program to include:
 - A. Steps the LEA will use to monitor and provide technical assistance for the implementation of all Federal programs.
 - B. Position(s) responsible for the implementation and monitoring.
 - C. Frequency of monitoring (timeline).

1.1 MONITORING OF PROGRAMS

Explanation – Evidence/Documentation (1.1D-G)

EVIDENCE OF IMPLEMENTATION

1. Monitoring of program evidence shall include written procedures used to monitor all critical ESEA/IDEA requirements of all programs (Title I, Part A; School Improvement 1003(a); School Improvement 1003; (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A - McKinney-Vento Act; IDEA; and CARES/CRRSA/ARP) and its implementation at the district and schools (where applicable). These procedures will specify how the district will monitor each federal program to include:
 - D. List of documentation that will be maintained to verify the Title programs have been monitored.
 - E. Follow-up/verification of corrective actions at schools and district (identified by the LEA).
 - F. Review of applicable federal program budgets (development).
 - G. Description of the process the LEA uses to identify high risk schools within the district.

1.1 MONITORING OF PROGRAMS

Explanation – Evidence/Documentation (1.1H-I)

EVIDENCE OF IMPLEMENTATION

1. Monitoring of program evidence shall include written procedures used to monitor all critical ESEA/IDEA requirements of all programs (Title I, Part A; School Improvement 1003(a); School Improvement 1003; (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A - McKinney-Vento Act; IDEA; and CARES/CRRSA/ARP) and its implementation at the district and schools (where applicable). These procedures will specify how the district will monitor each federal program to include:
 - H. IDEA procedures to include SST, Child Find, evaluation/re-evaluation, eligibility and discipline.
 - I. Procedures to include how the LEA monitors EL entrance/exit processes and Title III, Part A supplemental language instruction educational programs (LIEP), EL-specific professional learning, EL parent/family/community outreach, and Immigrant programs when applicable.

1.1 MONITORING OF PROGRAMS

Notes About Consolidation of Funds

NOTES ABOUT CONSOLIDATION OF FUNDS

Procedures are required for LEAs with CoF Schools.

1.1 MONITORING OF PROGRAMS

Notes About Transferability

NOTES ABOUT TRANSFERABILITY

Internal procedures should include all federal programs for which the LEA received federal funds, even if a program transfers the funds to a different federal program.

1.1 MONITORING OF PROGRAMS

Common Misunderstandings

- Thorough written procedures apply to all federal programs and not just Title I, Part A.
- Written procedures should explain how the LEA self-monitors their own federal programs and not how GaDOE monitors the LEA.

1.2 MONITORING OF IMPLEMENTATION

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

The LEA conducts monitoring of its programs for both implementation and effectiveness of funded strategies/activities at the LEA, school, and program levels to ensure compliance with Uniform Grant Guidance and Federal program requirements. (Title I, Part A; School Improvement 1003(a); School Improvement 1003(g) (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A--McKinney-Vento Act; Coronavirus AID, Relief, Economic Security (CARES), Coronavirus Response and Supplemental Appropriations (CRRSA), American Rescue Plan (ARP) - ESSER I, II, and III; and IDEA).

[ESEA](#): Sec 1114(b)(3); Sec 1304; Sec. 1306; Sec. 2104(a)(1); [2 CFR 200.301](#), [34 CFR 300](#); [McKinney Vento Sec. 722\(c\)\(3\)\(E\)](#) [2CFR-200.329](#); [Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments \(2016\)](#)

The LEA is implementing its FY23 LEA Equity Action Plan for the two equity gaps and each corresponding equity intervention selected for improvement.

[ESEA](#): 2101(d)(2)(E), [Georgia EAEE](#); [ESEA](#): Sec. 1111(d)(1)(B)(vi), Section 1111(d)(2)(B)(iv), Section 1112(b)(1) [ESEA](#): Sec. 4105(a); 4104(a)(2); [ESEA](#): Sec. 4106(c)(1-2); 4106(e)(2)(A)

1.2 MONITORING OF IMPLEMENTATION

Explanation – Evidence/Documentation (1.2.A-B)

EVIDENCE OF IMPLEMENTATION

2. Monitoring implementation evidence shall include implementation of the LEAs written procedures for monitoring (Title I, Part A; School Improvement 1003(a); School Improvement 1003; (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A - McKinney-Vento Act; IDEA; CARES/CRRSA/ARP). LEAs may provide the following types of documentation or other types of documentation:
 - A. Data collection instruments used to monitor the implementation of all federally funded activities/strategies and budgets (interview guides, program review checklists, monitoring reports).
 - B. Summary and supporting documentation of the LEA's progress in monitoring the implementation of the FY 23 LEA Equity Action Plan (required) that addresses each LEA selected equity gap and corresponding equity intervention (sign-in sheets, agendas, training documents, contracts/ agreements, purchase orders, reports - discipline, staffing, attendance, etc.).

1.2 MONITORING OF IMPLEMENTATION

Explanation – Evidence/Documentation (1.2.C-G)

EVIDENCE OF IMPLEMENTATION

2. Monitoring implementation evidence shall include implementation of the LEAs written procedures for monitoring (Title I, Part A; School Improvement 1003(a); School Improvement 1003; (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A - McKinney-Vento Act; IDEA; CARES/CRRSA/ARP). LEAs may provide the following types of documentation or other types of documentation:
- C. The LEAs schedule for monitoring schools.
 - D. Samples of communications to schools.
 - E. Evidence of technical assistance provided by the LEA because of issues identified through the monitoring process (monitoring reports, corrective actions from the schools visited).
 - F. Minutes of board meeting approving the annual Grant Award Notification – SIG.
 - G. Policies on Federal Grant Administration – SIG.

1.2 MONITORING OF IMPLEMENTATION

Explanation – Evidence/Documentation (1.2.H-I)

EVIDENCE OF IMPLEMENTATION

2. Monitoring implementation evidence shall include implementation of the LEAs written procedures for monitoring (Title I, Part A; School Improvement 1003(a); School Improvement 1003; (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A - McKinney-Vento Act; IDEA; CARES/CRRSA/ARP). LEAs may provide the following types of documentation or other types of documentation:
 - H. Title I Part C - Supplemental Services Tracking form including comments if services have not been provided), home visit documentation, OSY profiles, preschool assessments.
 - I. Evidence of monitoring Title III, Part A English Learner and Immigrant programs, such as documentation of school visits, oversight of program implementation, corrective action steps taken, etc.

1.2 MONITORING OF IMPLEMENTATION

Explanation – Evidence/Documentation (1.2.J)

EVIDENCE OF IMPLEMENTATION

2. Monitoring implementation evidence shall include implementation of the LEAs written procedures for monitoring (Title I, Part A; School Improvement 1003(a); School Improvement 1003; (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A - McKinney-Vento Act; IDEA; CARES/CRRSA/ARP). LEAs may provide the following types of documentation or other types of documentation:
 - J. Title IV, Part A—Addressing the prioritization of funds and progress towards meeting intended outcomes (Required)-Evidence/source documentation to include:
 - i. Systematic monitoring of progress during the implementation of Title IV, Part A funded activities with relevant stakeholders and/or community-based partners (samples of communications, meeting agendas/participants/annotated minutes, progress monitoring schedules/reports/forms, data collection instruments/reports with analysis).
 - ii. Demonstration of assurances to prioritize the distribution of funds during the fiscal year of allocation (required) (CLIP/SCLIP and budget alignment and reflective of the LEAs current condition, execution of plan).

1.2 MONITORING OF IMPLEMENTATION

Notes About Consolidation of Funds (Part 1)

NOTES ABOUT CONSOLIDATION OF FUNDS

Monitoring COF Schoolwide Plan Implementation

- GaDOE will select a sample of CoF schools. For formula grants the LEA will need to provide copies of the most recent schoolwide plans (SWP) and corresponding intent and purpose (I&P) statements. For competitive grants, GaDOE will refer to the approved grant application.
- LEAs will provide LEA/School-selected documentation demonstrating how the LEA carried out their procedures for monitoring critical ESEA/IDEA requirements of all consolidated programs and their implementation at sampled consolidating Title I schoolwide schools.

Program Specific Requirements

- **Title I, Part C:** Must include evidence of high quality and comprehensive programming and services provided during the school year and that address unique needs of migrant students. As applicable documentation may include services provided during summer or intercession. (Documentation may include tutoring schedules, supplemental classroom supports, usage reports for supplemental technology, etc.) Documentation must align to approved MEP COF plan. Approved MEP CoF plan is on file with GaDOE.

1.2 MONITORING OF IMPLEMENTATION

Notes About Consolidation of Funds (Part 2)

NOTES ABOUT CONSOLIDATION OF FUNDS

Program Specific Requirements

- **Title III, Part A: English Learners:**

- a. Must include evidence of implementation of supplemental language instruction program(s) [must be supplemental to language instruction program required by US Office of Civil Rights (OCR), Civil Rights Act of 1964, Equal Education Opportunities Act of 1974, and State/Local Laws].
- b. Must include evidence of implementation of EL focused professional learning for all classroom teachers, including teachers that are not ESOL teachers, principals and other school leaders, administrators and other school or community-based organizational personnel.
- c. Must include evidence of EL parent, family and community engagement activities that enhance or supplement the school's language instruction programs for ELs.

1.2 MONITORING OF IMPLEMENTATION

Notes About Consolidation of Funds (Part 3)

NOTES ABOUT CONSOLIDATION OF FUNDS

Program Specific Requirements

- **Title III, Part A: Immigrant:** Must include evidence of implementation of SWP activities that provide enhanced instructional opportunities for immigrant children and youth, which may include family literacy, training and outreach, recruitment of personnel trained to provide services to immigrants, tutorials, mentoring, academic or career counseling, instructional resources, technology, activities coordinated with community organizations with expertise working with immigrant, and instructional services designed to address students' sense of well-being and connectedness in U.S. school systems.
- **Title IV, Part A:** LEAs that consolidate more than \$30,000 in Title IV, Part A Funds must include evidence of meeting the intent and purpose of the three IVA focus areas collectively across the LEA (Safe and Healthy, Well-Rounded, Effective Use of Technology). If the GaDOE sample is not sufficient to demonstrate compliance, the LEA should include additional documentation.

1.2 MONITORING OF IMPLEMENTATION

Notes About Transferability

NOTES ABOUT TRANSFERABILITY

Not reviewed by Title II, Part A and/or Title IV, Part A if 100% of the funds have been transferred.

1.2 MONITORING OF IMPLEMENTATION

Common Misunderstandings

- Limited or inconsistent evidence of monitoring the implementation of non-Title I, Part A programs.
- Evidence should support the LEAs written procedures provided for monitoring the implementation of ALL Federal programs and not limited to Title I, Part A.

1.3 MONITORING OF EFFECTIVENESS

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

The LEA conducts monitoring of its programs for both implementation and effectiveness of funded strategies/activities at the LEA, school, and program levels to ensure compliance with Uniform Grant Guidance and Federal program requirements. (Title I, Part A; School Improvement 1003(a); School Improvement 1003(g) (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A--McKinney-Vento Act; Coronavirus AID, Relief, Economic Security (CARES), Coronavirus Response and Supplemental Appropriations (CRRSA), American Rescue Plan (ARP) - ESSER I, II, and III; and IDEA).

[ESEA: Sec 1114\(b\)\(3\); Sec 1304; Sec. 1306; Sec. 2104\(a\)\(1\); 2 CFR 200.301, 34 CFR 300; McKinney Vento Sec. 722\(c\)\(3\)\(E\) 2CFR-200.329; Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments \(2016\)](#)

The LEA is implementing its FY23 LEA Equity Action Plan for the two equity gaps and each corresponding equity intervention selected for improvement.

[ESEA: 2101\(d\)\(2\)\(E\), Georgia EAEE; ESEA: Sec. 1111\(d\)\(1\)\(B\)\(vi\), Section 1111\(d\)\(2\)\(B\)\(iv\), Section 1112\(b\)\(1\) ESEA: Sec. 4105\(a\); 4104\(a\)\(2\); ESEA: Sec. 4106\(c\)\(1-2\); 4106\(e\)\(2\)\(A\)](#)

1.3 MONITORING OF EFFECTIVENESS

Explanation – Evidence/Documentation (1.3.A-B)

EVIDENCE OF IMPLEMENTATION

3. Monitoring effectiveness evidence shall include documentation of the effectiveness of grant funded activities for all applicable programs (Title I, Part A; School Improvement 1003(a); School Improvement 1003; (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A - McKinney-Vento Act; IDEA; CARES/CRRSA/ARP). LEAs may provide the following types of documentation or other types of documentation:
 - A. Source documentation to support summary data and analysis for determining the effectiveness of all federally funded activities/strategies from the CLIP and the Title I SWP/TAP plan(s), and the FY22 Equity Action Plan.
 - B. Source documentation (summary data and analysis) to support effectiveness determination in the FY22 Title II, Part A Effectiveness Budget submission that explains the effectiveness of each Title II, Part A funded strategy/activity in addressing one or more of the LEA's prioritized needs from the FY22 District Improvement Plan (required).

1.3 MONITORING OF EFFECTIVENESS

Explanation – Evidence/Documentation (1.3.C-F)

EVIDENCE OF IMPLEMENTATION

3. Monitoring effectiveness evidence shall include documentation of the effectiveness of grant funded activities for all applicable programs (Title I, Part A; School Improvement 1003(a); School Improvement 1003; (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A - McKinney-Vento Act; IDEA; CARES/CRRSA/ARP). LEAs may provide the following types of documentation or other types of documentation:
 - C. Title I, Part C prior year (and current year, if available), Program Evaluation summary (include data disaggregation of migrant compared to non-migrant; migrant PFS compared to migrant non-PFS, IPs implemented and observed, services provided, PAC feedback).
 - D. Homeless Education Program Evaluation summary.
 - E. Summary data, analysis, and source documentation to support the identified effectiveness determination of each FY22 Title III, Part A funded activity. LEA FY23 data as specified on the Title III, Part A English Learner Program Overview Report.
 - F. Completed/annotated logic models.

1.3 MONITORING OF EFFECTIVENESS

Explanation – Evidence/Documentation (1.3.G)

EVIDENCE OF IMPLEMENTATION

3. Monitoring effectiveness evidence shall include documentation of the effectiveness of grant funded activities for all applicable programs (Title I, Part A; School Improvement 1003(a); School Improvement 1003; (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A - McKinney-Vento Act; IDEA; CARES/CRRSA/ARP). LEAs may provide the following types of documentation or other types of documentation:
 - G. Title IV, Part A—Measuring the Effectiveness of Title IV, Part A supported activities implemented during the fiscal year of allocation (required) for the purposes of annual public reporting (posted by SEA).
 - i. FINAL EXPENDITURE/EFFECTIVENESS MEASURES tab completed (closed grants demonstrate budget and completion report alignment; data fields completed for closed grants {required for FY21 and beyond}).
 - ii. Source documentation to support posted effectiveness measures (completed logic models, data analysis summary, alignment to provided evidence-based level).

1.3 MONITORING OF EFFECTIVENESS

Notes About Consolidation of Funds (Part 1)

NOTES ABOUT CONSOLIDATION OF FUNDS

Monitoring COF Schoolwide Plan Effectiveness

GaDOE will select a sample of CoF schools. For formula grants the LEA will need to provide copies of the most recent schoolwide plans (SWP) and corresponding intent and purpose (I&P) statements. For competitive grants, GaDOE will refer to the approved grant application.

LEAs will provide LEA/School-selected documentation demonstrating the effectiveness of grant funded activities and interventions included in the SWP and I&P for all consolidated federal programs at all sampled consolidating Title I schoolwide schools.

Program Specific Requirements

Title I, Part C: The Program Evaluation Template is optional; data disaggregation of migrant compared to non-migrant is required; migrant PFS compared to migrant non-PFS is required
Foster: Effectiveness of SWP in supporting Foster subgroup including comparison of Foster care subgroup performance with non-foster care subgroup is required.

Homeless: Effectiveness of SWP in supporting homeless subgroup including comparison of homeless subgroup performance with non-homeless subgroup is required.

1.3 MONITORING OF EFFECTIVENESS

Notes About Consolidation of Funds (Part 2)

NOTES ABOUT CONSOLIDATION OF FUNDS

Program Specific Requirements

Title III, Part A:

- a. Evidence of increase in English Language proficiency and academic achievement of English Learners (Must include data from Access and Georgia Milestones - CCRPI: Progress Towards Proficiency Progress Points and Closing the Gaps). Additional data may be provided (MAP, digital language learning resources, etc.).
- b. Effectiveness of EL focused professional learning for all classroom teachers, including teachers that are not ESOL teachers, principals and other school leaders, administrators and other school or community-based organizational personnel.
- c. Effectiveness of EL parent, family and community engagement activities that enhance or supplement the school's language instruction programs for ELs.

Title IV, Part A:

Effectiveness of the three IVA focus areas collectively across the LEA (Safe and Healthy, Well-Rounded, Effective Use of Technology). If the GaDOE sample is not sufficient to demonstrate compliance, the LEA should include additional documentation.

1.3 MONITORING OF EFFECTIVENESS

Notes About Transferability

NOTES ABOUT TRANSFERABILITY

Not reviewed by Title II, Part A and/or Title IV, Part if 100% of the funds have been transferred.

1.3 MONITORING OF EFFECTIVENESS

Common Misunderstandings

- Effectiveness is not the same as evidence-based.
- No data analysis evidence (summary, etc.) - only raw data provided or partial/incomplete analysis.
- Limited effectiveness evidence for non-Title I, Part A programs.
- Incomplete Logic Models.
- Evidence should support the LEAs written procedures provided for monitoring the effectiveness of ALL Federal programs and not limited to Title I, Part A.
- Misconception is only providing raw data, evidence should include data analysis(summary).

2.1 CONSOLIDATED LEA IMPROVEMENT PLAN

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

The LEA ensures that it complies with the provision for submitting an annual application to the SEA and revising the LEA's plans as necessary to reflect substantial changes in the direction of the LEA's program. (Title I, Part A; School Improvement 1003(a); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A—McKinney Vento Act; and IDEA)

[ESEA](#): Sec. 1112, 1114, 1115, 1116; Sec. 1003; Sec. 1306; Sec. 1423; Sec. 122; Sec. 3116; Sec. 4105(a); Sec. 4106; Sec. 5223; Sec. 5224; Sec. 6223; Sec. 6722; Sec. 9305

2.1 CONSOLIDATED LEA IMPROVEMENT PLAN

Explanation – Evidence/Documentation (1.A-B)

EVIDENCE OF IMPLEMENTATION

1. CLIP evidence shall include:

- A. Written procedures for creating, reviewing, and approving the CLIP for all programs, which shall include resolution procedures for unapproved CLIPs (Title I, Part A; School Improvement 1003(a); School Improvement 1003 (SIG); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A - McKinney-Vento Act; IDEA; and CARES/CRRSA/ARP).
- B. Documentation to support the selection of evidence-based action steps in CLIP.

2.1 CONSOLIDATED LEA IMPROVEMENT PLAN

Explanation – Evidence/Documentation (1.C)

EVIDENCE OF IMPLEMENTATION

1. CLIP evidence shall include:

C. CLIP Preparation:

- i. Evidence to verify the participation of required stakeholders and community-based partners for each program in CLIP preparation.
- ii. Evidence of CLIP preparation may include review checklists (CLIP Review Rubric), established schedule, samples of correspondence with schools and other LEA departments.
- iii. Title IV, Part A Needs Assessment (Required as applicable-see ESEA Sec4106(2) or (3).
 - a. Source documentation to support that the LEA conducted a comprehensive needs assessment that examined needs to improve access/opportunities for a well-rounded education for all students (WR), safe and healthy students (SH), professional development for educators to improve the effective use of technology (ET).

2.1 CONSOLIDATED LEA IMPROVEMENT PLAN

Notes About Consolidation of Funds

NOTES ABOUT CONSOLIDATION OF FUNDS

A & C: CLIP: The CLIP is an LEA Level responsibility that occurs before consolidation and is not waived under CoF

- IVA Ongoing consultation requirements are not waived under consolidation

B: LEAs are not required to provide evidence-based documentation for activities/interventions. purchased with Fund 150 in CoF schools.

2.1 CONSOLIDATED LEA IMPROVEMENT PLAN

Notes About Transferability

NOTES ABOUT TRANSFERABILITY

If an LEA transfers funds the LEA should discuss this option with stakeholders.

Transfers of funds should be included in the CLIP submission.

2.1 CONSOLIDATED LEA IMPROVEMENT PLAN

Common Misunderstandings

- Limited or missing evidence of required stakeholders participating in CLIP development.
- Participants' role not indicated on CLIP meeting attendance rosters.
- Collaboration between stakeholders is required.

2.2 TITLE I, PART A SCHOOLWIDE/TARGETED ASSISTANCE

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

The LEA ensures that it complies with the provision for submitting an annual application to the SEA and revising the LEA's plans as necessary to reflect substantial changes in the direction of the LEA's program. (Title I, Part A; School Improvement 1003(a); Title I, Part C; Title I, Part, D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title IX, Part A—McKinney Vento Act; and IDEA).

[ESEA](#): Sec. 1112, 1114, 1115, 1116; Sec. 1003; Sec. 1306; Sec. 1423; Sec. 122; Sec. 3116; Sec. 4105(a); Sec. 4106; Sec. 5223; Sec. 5224; Sec. 6223; Sec. 6722; Sec. 9305

2.2 TITLE I, PART A SCHOOLWIDE/TARGETED ASSISTANCE

Explanation – Evidence/Documentation

EVIDENCE OF IMPLEMENTATION

2. Title I, Part A Schoolwide/Targeted Assistance evidence shall include:
 - A. Written procedures for creating, reviewing, and approving the Schoolwide Program/Targeted Assistance Program Plans which also includes resolution procedures for unapproved Schoolwide Program and Targeted Assistance Program Plans.
 - B. Documentation to support the selection of evidence-based action steps in the Schoolwide Program/Targeted Assistance Program Plans.
 - C. Timely guidance to schools on submission of plan amendments.
 - D. Evidence of timely Schoolwide Program and Targeted Assistance Program plan approval and release of funds.
 - E. Source documentation verifying stakeholder involvement in Schoolwide Program/Targeted Assistance Program Plan development.

2.2 TITLE I, PART A SCHOOLWIDE/TARGETED ASSISTANCE

Notes About Consolidation of Funds

NOTES ABOUT CONSOLIDATION OF FUNDS

- Targeted Assistance Schools are not eligible for CoF. No requirements are waived.
- 2.A, C, D, E Are LEA requirements for oversight of program implementation. Procedures and documents may align with requirements in 1.1-1.3.
- 2.B Evidence-based action steps are not required for CoF schools.

2.2 TITLE I, PART A SCHOOLWIDE/TARGETED ASSISTANCE

Common Misunderstandings

- The SWP/TAP is reviewed and revised annually through collaboration with stakeholders.

ESEA Equitable Services

Reviewed by ESEA Program Staff
Coordinated Across ESEA Programs
Supported by State Ombudsman Team



3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

ESEA

- Evidence that the LEA provides for the equitable provision of services to eligible private school children, their teachers, principals, and other school leaders.
- Evidence that LEA provided initial consultation to private schools on their participation.
- For LEAs with Participating Private Schools: Evidence that participating private schools engage in ongoing consultation around the equitable provision services.

ESEA: Sec. 1117 and 1120; Sec. 2102(b)(2)(E); Sec.8501(a)(5); Sec. 8501(c); Sec. 4106(e)(2)(B); Sec. 8501(a)(5); Sec. 8501(c); 34 CFR Part 200.62-200.67; 34 CFR Part 200.77 (f) ED Non-Regulatory Guidance Title IX, Part E Equitable Services (2009); ED Non-Regulatory Guidance Title I, Part A Equitable Services (2019)

3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Evidence of Implementation (3.1.A)

EVIDENCE OF IMPLEMENTATION

1. ESEA Equitable Services evidence shall include:
APPLICABLE TO ALL CITY AND COUNTY SCHOOL DISTRICTS; APPLICABLE TO ALL IVB SUBGRANTEES
 - A. ES4PS: 2022-2023 Invitations: Invitations (sent 2021-2022) to private schools for the provision of FY23 equitable services to eligible private schools based on DE1111 forms submitted by private schools to LEAs in FY22 and the GaDOE Private School List (compiled from statewide DE1111 submissions) [on file with GaDOE].
 - i. Title I, Part A - Invitations to private schools serving students whose residence is within Title I eligible attendance areas (based on DE1111 address, grade, age).
 - ii. Title I, Part C, Title II, Part A, Title III, Part A, and Title IV, Part A - Invitation to private schools whose physical location is within the LEA's geographic boundaries.
 - iii. Title IV, Part B – invitations to private schools whose physical location is within the geographic boundaries of the targeted attendance area identified in the approved, or amended, grant application (RFP).

3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Evidence of Implementation (3.1.B-C)

EVIDENCE OF IMPLEMENTATION

1. ESEA Equitable Services evidence shall include:
APPLICABLE TO ALL CITY AND COUNTY SCHOOL DISTRICTS; APPLICABLE TO ALL IVB SUBGRANTEES
 - B. Good Faith Effort:** If an LEA did not receive a ‘No’ response in ES4PS for each private school for which 2022-2023 invitations were required, the LEA must provide a copy of documentation demonstrating a good faith effort was made to contact each private school. For schools without responses the good faith effort must demonstrate contact through multiple methods. [LEA must provide]
 - C. Initial Consultation:** Evidence that initial consultation for 2022-2023 services occurred between the LEA and private school officials or its representatives regarding services for private school children prior to the start of the grant (July 1, 2022). [LEA must provide]
 - i. Evidence that a consultation meeting is held. A meeting is not required if an LEA confirmed no participation for every eligible school prior to the scheduled meeting.
 - ii. Evidence that initial consultation covered all topics required by statute.
 - iii. Documentation of initial consultation attendance. Attendance by participating school(s) must be included in documentation.

3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Evidence of Implementation (3.1.D-F)

EVIDENCE OF IMPLEMENTATION

1. ESEA Equitable Services evidence shall include:

APPLICABLE TO ALL CITY AND COUNTY SCHOOL DISTRICTS; APPLICABLE TO ALL IVB SUBGRANTEES

In districts with 3 or more participating schools, program staff will select a sample of 3 schools. LEAs should provide documentation for 3.1.H-L for the 3 identified schools.

- D. Form A: ES4PS:** 2022-2023 Form A for all participating private schools [on file with GaDOE].
- E. Form B: ES4PS:** 2021-2022 Form B for all participating private schools [on file with GaDOE].
- F. Nonprofit Status:** Documentation of current year nonprofit status for every participating private school using 1 of 4 allowable document types [LEA must provide].

3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Evidence of Implementation (3.1.G)

EVIDENCE OF IMPLEMENTATION

1. ESEA Equitable Services evidence shall include:

APPLICABLE TO ALL CITY AND COUNTY SCHOOL DISTRICTS; APPLICABLE TO ALL IVB SUBGRANTEES

G. Proportionate Share Private School Counts: Documentation supporting 2022-2023 Form A Program Counts used to generate FY23 proportionate share. [LEA must provide]

i. Title I, Part A Count

a. Verification of student residency (address, grade, age)

b. Verification of poverty using one or more statutory methods

ii. Title II, Part A, and Title IV, Part A Count

a. Verification of K-12 Enrollment

iii. Title III, Part A Count

a. Verification of K-12 English Learner students identified in 2021-2022 and/or K-12 Immigrant students identified in October 2022

iv. Title IV, Part B

a. Verification that student count was discussed with private schools in the development of the approved RFP or a subsequent RFP amendment.

3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Evidence of Implementation (3.1.H)

EVIDENCE OF IMPLEMENTATION

1. ESEA Equitable Services evidence shall include:

APPLICABLE TO ALL LEAs/SUBGRANTEES WITH PRIVATE SCHOOLS PARTICIPATING IN EQUITABLE SERVICES

H. Equitable Services Eligibility: Documentation supporting 2022-2023 Student Eligibility for Services. [LEA must provide]

- i. Verification of eligibility to receive Title I, Part A services.
 - a. Verification of student residency (address, grade, age).
 - b. Documentation of multiple, educationally related, objective criteria used to rank order eligible students for services.
- ii. Title III, Part A English Learner and Immigrant Data Roster for Private Schools.

3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Evidence of Implementation (3.1.I-J)

EVIDENCE OF IMPLEMENTATION

1. ESEA Equitable Services evidence shall include:

APPLICABLE TO ALL LEAs/SUBGRANTEES WITH PRIVATE SCHOOLS PARTICIPATING IN EQUITABLE SERVICES

- I. **Needs Assessment:** Needs assessment results of private school students and their families, teachers, and leaders supporting FY23 Equitable Services Implementation Plan. [LEA must provide]
- J. **Plan & Budget:** Documentation of FY23 Implementation Plan for Services [LEA must provide] and aligned FY23 budget, including budget adjustments [on file with GaDOE].

3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Evidence of Implementation (3.1.K)

EVIDENCE OF IMPLEMENTATION

1. ESEA Equitable Services evidence shall include:

APPLICABLE TO ALL LEAs/SUBGRANTEES WITH PRIVATE SCHOOLS PARTICIPATING IN EQUITABLE SERVICES

- K. **Ongoing Consultation:** Records of provision and oversight of FY23 services, materials and/or resources. [LEA must provide] Documentation must include:
- i. Documentation of ongoing consultation during 2022-2023, such as dated meeting agendas and/or minutes with sign-in rosters, email exchanges, etc. Ongoing consultation should ensure little to no carryover. For schools with FY22 carryover, documentation to demonstrate mitigation efforts.
 - ii. Inventory (FY19-FY23).
 - iii. FY23 Expenditures (LEA-selected. 3 per school. When applicable, sample must include items from different functional categories.)
 - iv. Documentation of reservation and implementation of required FY23 set asides (IA Parent and Family Engagement, Instruction and PD).
 - v. Evidence of evaluation of programs and services for effectiveness.

3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Evidence of Implementation (3.1.L)

EVIDENCE OF IMPLEMENTATION

1. ESEA Equitable Services evidence shall include:

APPLICABLE TO ALL LEAs/SUBGRANTEES WITH PRIVATE SCHOOLS PARTICIPATING IN EQUITABLE SERVICES

L. **Complaints:** If applicable, evidence of adequately addressing problems and complaints raised by private school officials. [LEA must provide]

3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Notes About Consolidation of Funds

NOTES ABOUT CONSOLIDATION OF FUNDS

Equitable services requirements are an LEA responsibility and are not waived under CoF.

3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Notes About Transferability

NOTES ABOUT TRANSFERABILITY

LEAs must discuss that the LEA intends to transfer funds with private schools during the consultation process before the LEA has made a final decision to transfer funds.

3.1 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Common Misunderstandings

- Transfers of IIA and IVA do not alleviate the LEAs responsibility to conduct consultation with private schools.
- Almost all LEAs (178/180 city and county school districts) are required to reach out to private schools to conduct consultation.
- All required consultation topics and subsequent planning must be completed and documented prior to the start of services.
- LEAs do not have to upload any documents that are listed as 'on file with GaDOE'.
- Expenditures and inventory for private schools are reviewed in 3.1, not 5.1 and 5.2.

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IDEA Equitable Services



3.2 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

IDEA:

- If the LEA provided services, it was beyond the existing level of instruction at the private schools.
- The LEA substantiates the number of private and home school students with disabilities that do not have Individual Educational Plans (IEPs).
- The LEA enters its Child Find count into the Proportionate Share tab in the Consolidated Application for years prior to FY21. For FY22, LEAs will complete and upload the proportionate share form.
- The LEA tracks proportionate share funds.
- The LEA spends required Proportionate Share amount within grant period. If the correct amount was not expended, the LEA carries over that portion to be spent during the subsequent fiscal year.

3.2 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Monitoring Indicator Requirements(cont.)

REQUIREMENTS

IDEA:

- The LEA maintains controls of any property, equipment and supplies from IDEA used for Proportionate Share.
- If private school personnel were contracted, services were outside the regular duty hours of the teacher unless explicit time was set aside and funded.
- The LEA used state and local funds to supplement, not supplant, the required federal funds to be expended.
- The LEA completes the consultation process to include advertising of process.
- The LEA provides Child Find activities for private schools similar to the LEA schools.
- The LEA states the amount of funds available and the type of services to be provided prior to the start of the new school year.

[34 CFR 300.130 – 144; 612 \(a\) \(10\)\(A\)](#)

3.2 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Evidence/Documentation (3.2.A-B.i-iv)

EVIDENCE OF IMPLEMENTATION

2. IDEA - evidence shall include:

A. Written Procedures that the LEA uses to determine that the required consultation occurred.

B. Evidence of the following:

- i. LEA has met the requirement or consultation, written affirmation, and evaluation of the program.
- ii. Consultation has occurred between the LEA and stakeholders for eligible private and home school children.
- iii. Written affirmation from officials of private school or a representative or home school representatives.
- iv. LEA compiles data related to implementation of equitable services to include private school (homeschool) details, student name, grade, S or N status (FT085 report), service plan, eligibility dates, GTID and any other necessary data.

3.2 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Explanation – Evidence/Documentation (3.2.A-B.v-x)

EVIDENCE OF IMPLEMENTATION

2. IDEA - evidence shall include:

B. Evidence of the following:

- v. LEA has met the requirement for financial record keeping related to services to private and home school children that facilitate an effective or programmatic audit.
- vi. LEA has documentation when serving private school or home school children through contracts with a third party that ensures the third party is providing services to eligible private school children in accordance with all IDEA requirements.
- vii. LEA regularly supervises the provision of IDEA services to private and home school children.
- viii. Service plans, when applicable.
- ix. Child Find activities to private schools.
- x. LEA has documentation that each participating private school has non-profit status.

3.2 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Notes About Consolidation of Funds

NOTES ABOUT CONSOLIDATION OF FUNDS

Equitable services requirements are a LEA responsibility and are not waived under CoF.

3.2 SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN

Common Misunderstandings

- Timely and Meaningful consultations should occur as often as needed.
- The FT085 count drives the proportionate share set-aside amount. The timely and meaningful consultation determines the students served in current year.

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4.1 MAINTENANCE OF EFFORT

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

The LEA ensures that it complies with the procedures for ensuring maintenance of effort (MOE).

[ESEA: Sec. 1118](#); [ESEA: Sec 1114](#); [34 CFR 300.203](#); [34 CFR 300.204](#); [34 CFR 300.205](#) and [IDEA Sec. 300.203](#) ; [IDEA Sec. 300.204](#)

4.1 MAINTENANCE OF EFFORT

Explanation – Evidence/Documentation (4.1A)

EVIDENCE OF IMPLEMENTATION

1. Maintenance of Effort (MOE) evidence shall include:
 - A. ESSA documentation for ensuring Maintenance of Effort (MOE) for ESSA programs:
 - i. Written procedures (ONLY if MOE is NOT MET) for determining Maintenance of Effort (MOE), including funds to be excluded from MOE calculations.
 - ii. ESEA documentation for ensuring Maintenance of Effort (MOE) as outlined in Sec. 1120A and 8521 of the ESEA shall include:
 - a. If MOE is MET during the current fiscal year, no evidence is required.
 - b. If MOE is NOT MET during the current fiscal year, the following is required:
 - Source data to support the request to the Department to seek waiver.

4.1 MAINTENANCE OF EFFORT

Explanation – Evidence/Documentation (4.1B)

EVIDENCE OF IMPLEMENTATION

1. Maintenance of Effort (MOE) evidence shall include:
 - B. IDEA documentation for ensuring maintenance of effort (MOE) for IDEA:
 - i. If MOE is MET, the required evidence would be a detailed expenditure report from the DE046 for the following special education program codes for the current compliance year: 2011 and 2081. Note: There are several additional state and local special education program codes on the DE046, however we will only be reviewing expenditures reported in those two codes.
 - ii. If MOE is NOT MET, documentation would consist of:
 - a. MOE Eligibility Form with projected expenditures for the current year.
 - b. Exception requirement forms with supporting evidence verifying expenditures (usually this is expenditure report) maintained by LEA for LEAs that did not meet or LEAs who reduce effort optionally.
 - c. Adjustments, if applicable, should have supporting evidence verifying expenditures maintained by LEA.

4.1 MAINTENANCE OF EFFORT

Notes About Consolidation of Funds

NOTES ABOUT CONSOLIDATION OF FUNDS

Maintenance of Effort is an LEA responsibility and is not waived under CoF.

4.1 MAINTENANCE OF EFFORT

Common Misunderstandings

MOE applies to all Federal programs.

4.2 COMPARABILITY

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

The LEA ensures that it complies with:

- the procedures for meeting the comparability requirement.
- the LEA is monitoring comparability at least every two years.

GaDOE requires that LEAs must meet comparability requirements annually.

[ESEA](#): Sec. 1118(3)(A)

4.2 COMPARABILITY

Explanation – Evidence/Documentation

EVIDENCE OF IMPLEMENTATION

2. Comparability evidence shall include:
 - A. Written procedures for meeting comparability requirement as outlined in Sec. 1118(3)(A).
 - B. In cases where Title I schools are not comparable; documentation shall include evidence of adjustments (including dates of hire or staff reassignment to meet comparability) to the allocation of resources that the LEA made to ensure that Title I and non-Title I schools are comparable.
 - C. Documentation to affirm LEA has fully and correctly implemented its Resource Allocation Methodology/Plan (RAM/P) to establish comparability if student/teacher ratio methodology fails to demonstrate comparability.
 - i. Evidence may include payroll records, detailed school expenditure reports, and school-based budgets.

4.2 COMPARABILITY

Notes About Consolidation of Funds (5.1.A-D)

NOTES ABOUT CONSOLIDATION OF FUNDS

Assessment is an LEA responsibility and is not waived under CoF.

4.3 ASSESSMENT SECURITY, REPORTING OF ACCOUNTABILITY

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

The LEA has a system for:

- ensuring and maximizing the quality, objectivity, utility, and integrity of assessment and accountability information disseminated by the LEA.
- monitoring and improving the on-going data quality of its assessment system.

[ESEA](#): Sec. 1111; Sec.1111(B)(2)(G)(i)

4.3 ASSESSMENT SECURITY, REPORTING OF ACCOUNTABILITY

Explanation – Evidence/Documentation (4.3.A-B)

EVIDENCE OF IMPLEMENTATION

3. Assessment Security, Reporting of Accountability
 - A. Assessment Security evidence shall include:
 - i. LEA test security policy/plan which includes consequences for violation
 - ii. Evidence of communication to local educators regarding the LEAs test security policy/plan which includes consequences for violation
 - B. Reporting of Accountability evidence shall include:
 - i. District/School State Report Card provided for public access on district and school level website(s)
 - ii. Procedures for who is responsible for ensuring that the appropriate link for the School Report Card has been posted on the district website (best practice is to also post on school website)

4.3 ASSESSMENT SECURITY, REPORTING OF ACCOUNTABILITY

Explanation – Evidence/Documentation (4.3.C)

EVIDENCE OF IMPLEMENTATION

3. Assessment Security, Reporting of Accountability
 - C. English language proficiency (ELP) Assessment Participation Rate evidence shall include:
 - i. Documentation of Spring 2022 *ACCESS for ELLs assessment* participation rate.
 - ii. Procedures for who is responsible for checking the participation rate and collecting the justification reasons if the percentage falls below 95%. Include a timeline.
 - iii. Corrective Action if participation rate is below 95%.

4.3 ASSESSMENT SECURITY, REPORTING OF ACCOUNTABILITY

Notes About Consolidation of Funds

NOTES ABOUT CONSOLIDATION OF FUNDS

Assessment is an LEA responsibility and is not waived under CoF.

4.3 ASSESSMENT SECURITY, REPORTING OF ACCOUNTABILITY

Common Misunderstandings

- LEA must provide procedures to indicate the position responsible for checking the ELP Assessment Participation Rate and must provide the justification reasons if the percentage falls below 95%.
- LEA must provide a corrective action documentation if their participation rate is below 95%.

5.1 INTERNAL CONTROLS

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

Internal Controls specific to LEA expenditures required to be in writing by [2 CFR Part 200](#) (Allowability, Segregation of Duties, Procurement, Technical Evaluations of Competitive Proposals, Conflict of Interest, Time and Effort, Stipends, Travel) are present and meet requirements for internal controls:

- Effectiveness and efficiency of operations
- Reliability of reporting for internal and external use
- Compliance with applicable laws and regulations

5.1 INTERNAL CONTROLS

Explanation – Monitoring Indicator Requirements (cont.)

REQUIREMENTS

- Ability to meet the following objectives for Federal Awards:
 - Transactions are properly recorded and accounted for, to:
 - Permit the preparation of reliable financial statements and Federal reports.
 - Maintain accountability over assets.
 - Transactions are executed in compliance with
 - Federal statutes, regulations, and the terms and conditions of the Federal award that could have a direct and material effect on a federal program.
 - Any other Federal statutes and regulations that are identified in the Compliance Supplement.

[2 CFR 200.303](#); [2 CFR 200.318-320](#); <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E/subject-group-ECFR20080eff2ea53/section-200.47>[GAO-14-704G](#); [GaDOE Rule 160-3-3](#); [2 CFR 200.403](#)

5.1 INTERNAL CONTROLS

Explanation – Monitoring Indicator Requirements (cont.)

REQUIREMENTS

The LEA maintains accounting records that are supported by source documentation and costs are allowable under applicable laws and regulations. Expenditures meet the following standards including, but not limited to:

- Segregation of duties in review and authorization (must include Program Coordinator).
- Reconciles all applicable reports (expenditure, budget, etc.)
- Allowable under applicable laws and regulations.
- Prove necessary, reasonable, and allocable.
- Supported by source documentation.
- Supplement, not supplant
- Align with approved Federal budget.
- Occur within the grant Period of Performance and benefits current grant period.
- Comply with standards of documentation of personnel expenditures (Time and Effort).
- Maintain oversight of contracts/purchase orders for contracted services.

5.1 INTERNAL CONTROLS

Explanation – Monitoring Indicator Requirements (cont.)

REQUIREMENTS

The LEA maintains accounting records that are supported by source documentation and costs are allowable under applicable laws and regulations. Expenditures meet the following standards including, but not limited to:

- Avoid conflict of interest.
- Provides time stamped documentation of verifying vendors against suspension and debarment database
- Follow federal procedures and/or policies related to competition and methods of procurement.

[ESEA](#): Sec. 1118, 1306, 1411, 1601; Sec. 2212; Sec. 3115(g); Sec. 4105(c); Sec. 4110; Sec. 5232; [2CFR 200.309](#); [2 CFR 200.213](#); [2 CFR 200.302\(b\)\(3\)](#); [2 CFR 200.302\(b\)\(4\)](#); [2 CFR 200.302 \(b\)\(5\)](#); [2 CFR 200.302\(b\)\(7\)](#); [2 CFR 200.309](#); [2 CFR 200.318](#); [2 CFR 200.319](#); [2 CFR 200.320](#); [2 CFR 200.320\(d\)\(3\)](#); [2 CFR 200.403](#); [2 CFR 200.403\(c\)](#); [2 CFR 200.403\(g\)](#); [2 CFR 200.404](#); [2 CFR 200.405](#); [2 CFR 200.430](#); [2 CFR 200.430 \(i\)](#); [2 CFR 200.474\(a\)](#); [2 CFR 200.508](#); [GAO-14-704G](#); [GaDOE Rule 160-3-3-.04](#); [34 CFR 81.31\(c\)](#); [34 CFR 76.707](#); [WHEO 12549, 12689](#); [ESEA Equitable Services](#); [2003 Title I Equitable Services Non-Regulatory Guidance](#); [2009 Title IX, Part E Non-Regulatory Guidance](#); [2016 Fiscal Changes Non-Regulatory Guidance](#)

5.1 INTERNAL CONTROLS

Explanation – Evidence/Documentation (5.1.A)

EVIDENCE OF IMPLEMENTATION

1. Internal controls, expenditures, inventory, drawdowns, cost principles evidence shall include:
 - A. Written procedures for internal controls **required to be in writing** by 2 CFR Part 200:
 - i. Allowability Procedures - 2 CFR Sec. 200.302(b)(7); 2 CFR Sec 200.403.
 - ii. Segregation of Duties - GAO-14-704G Standards for Internal Controls for the Federal Government 10.03;10.12-10.14; 2 CFR Sec. 200.303(a).
 - iii. Procurement Procedures - Specific levels described in §200.317 through §200.327); 2CFR Sec 200.318(a).
 - iv. Method for Conducting Technical Evaluations of Competitive Proposals and Selecting Recipients - 2 CFR Sec. 200.320(d)(3).
 - v. Conflict of Interest Policy - 2 CFR Sec. 200.318(c)(1).
 - vi. Personal Compensation Policies (Time and Effort to include salaries, substitutes, and stipends)- 2 CFR Sec. 200.430(a)(1); SBOE 160-3-3-.04.
 - vii. Travel Policy - 200.474; 200.475; OCGA §50-5B-5; OCGA §20-2-167(b); SBOE 160-5-2-.23; Financial Management for GA LUAs Chapter 40.

5.1 INTERNAL CONTROLS

Explanation – Evidence/Documentation (5.1.B-D)

EVIDENCE OF IMPLEMENTATION

1. Internal controls, expenditures, inventory, drawdowns, cost principles evidence shall include:
 - B. Evidence may include other recommended procedures not required in writing.
 - i. Procedures to support suspension and debarment is checked prior to making purchases above \$25,000 threshold (across programs) from single vendor (34 CFR 85.110 and 2 CFR 180.220).
 - ii. Written Transferability Procedures – ESEA Sec. 5103.
 - C. FY22 and FY23 Payroll & Expenditure Detail Reports for every program organized by site, function, and object (include LEA Chart of Accounts crosswalk, when applicable).
 - D. Source documentation for all requested expenditures (purchase orders, invoices, contracts/ contract deliverables, agendas, receipts, travel authorizations, pre-approval, federally funded instructors/ tutors, including part-time, full-time, and additional compensation, and administrative costs), all capital expenditures, all competitive procurement for every grant.

5.1 INTERNAL CONTROLS

Explanation – Evidence/Documentation (5.1.E-K)

EVIDENCE OF IMPLEMENTATION

- E. FY22 and FY23 Time and Effort Records (time logs, periodic certifications, fixed schedules, etc.).
- F. Special approval documentation (capital expenses, consolidation of administrative funds, etc.).
- G. Single audit reports for last two years available.
- H. Resource Allocation Method/Plan (RAM/P) to meet Title I, Part A supplement not supplant, including documentation to demonstrate methodology that equitably distributes state and local funds and resources to each of its schools before allocating federal funds.
- I. FY22 completion report (GaDOE provided) and FY22 general ledger for each federal program.
- J. Documentation to support how suspension and debarment is checked prior to making purchases above \$25,000 threshold (across programs) from single vendor.
- K. Source documentation to support administrative cost charges per grant.

5.1 INTERNAL CONTROLS

Notes About Consolidation of Funds (5.1.A-D)

NOTES ABOUT CONSOLIDATION OF FUNDS

A & B. Written Policies and Procedures

- Consolidated funds are subject to state and local policies.
- If 100% of funds are consolidated, GaDOE will check that policies are inclusive of each consolidated program and that impacted policies like cash management reflect required practices. If <100% of funds are consolidated, all policies will be reviewed.

C. Payroll and Expenditure Detail must be provided for Fund 150 and all contributing funds. It will be checked for proper allocation from Fund 150 to consolidating funds.

D. Alignment between policies and purchasing practices will be checked for purchases made in Federal Funds (IA/SI/IC 402, IDEA 404, VB 408, IIA 414, MV 432, 460 IIIA, IVA/IVB 462). Alignment between policies and purchasing practice will NOT be checked by GaDOE for purchases made in Fund 150.

5.1 INTERNAL CONTROLS

Notes About Consolidation of Funds (5.1.E-K)

NOTES ABOUT CONSOLIDATION OF FUNDS

- E. Time and effort records not checked for staff paid out of Fund 150.
- F. Special approval documentation not checked for items paid out of Fund 150.
- G. Single Audit reports are an LEA requirement and are not waived under CoF
- H. The RAM/P (when applicable) is an LEA requirement and is not waived under CoF.
- I. Completion reports and corresponding GL are an LEA requirement impacted by Fund 150 – checked for CoF.
- J. Suspension and debarment not checked for purchases made in Fund 150.
- K. Source documentation to support administrative cost charges per grant are an LEA requirement and not waived under CoF.

5.1 INTERNAL CONTROLS

Notes About Transferability

NOTES ABOUT TRANSFERABILITY

Not reviewed by Title II, Part A and/or Title IV, Part A if 100% of the funds have been transferred.

Reviewed by the receiving program in accordance with its fiscal requirements.

5.1 INTERNAL CONTROLS

Common Misunderstandings

- Documentation should be organized and in the correct date range.
- An understanding of Supplement Not Supplant for non-Title I, Part A programs:
 - ESOL expenditures should not be attributed to Title IIIA.
 - Expenditures should be aligned to approved budget.
 - Some Federal programs do not allow a 25% variance in function code.
- Updated written procedures need to include ALL Federal programs.
- Remove all out-of-date citations and guidance.

5.1 INTERNAL CONTROLS

Common Misunderstandings

- Superintendents may not make purchases outside of federal procurement requirements.
- Know the requirements for sole sourcing.
- LEAs may make a formal request to GaDOE to have a higher threshold for micro-purchase.
- Time and Effort records are required for all federally funded personnel (teachers, subs, bus drivers, tutors, etc).
- PARs should be reconciled to match percentages budgeted.

5.1 INTERNAL CONTROLS

Common Misunderstandings

- The Completion Report must align to the approved budget.
- Indirect cost can only be claimed for the expended funds.

5.2 INVENTORY INTERNAL CONTROLS

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

Inventory internal controls required to be in writing by [2 CFR Part 200](#) are present and meet requirement for internal controls:

- Funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.
- Maintenance procedures to keep the property in good condition.

[2 C.F.R. Sec. 200.62\(c\); 2 CFR 200.313; 2 CFR200.439](#)

5.2 INVENTORY INTERNAL CONTROLS

Explanation – Monitoring Indicator Requirements (cont.)

REQUIREMENTS

The LEA manages equipment in a way that meets the following conditions

- Use of the equipment for authorized purposes of the property during the period of performance, or until the property is no longer needed for the purposes of the project.
- Maintenance of property records to include person responsible for maintaining documentation. Purchase Orders and Inventory Records showing item description, cost, source of funding for equipment including the Federal Award Identification Number (FAIN), date of purchase, serial number or other identification number, location, use, condition of property, and disposition data including date of disposal.
- Physical inventories and reconciliation of physical inventory with property records.
- Adequate safeguards to prevent loss, damage, or theft of the property to include investigation if loss, damage, or theft occur.
- Sale of property procedures to ensure the highest possible return.
- Disposition of equipment in accordance with state laws and procedures.

[2 CFR 200.313](#)

5.2 INVENTORY INTERNAL CONTROLS

Explanation – Evidence/Documentation (5.2.A)

EVIDENCE OF IMPLEMENTATION

2. Inventory internal controls evidence shall include:
 - A. Written procedures for managing equipment - (including replacement equipment) until disposition takes place (check handbook). Procedures should include the following:
 - i. Acquisition of equipment.
 - ii. Method of entering information into the LEA's inventory management system.
 - iii. Off-site use of equipment.
 - iv. Physical inventory.
 - v. District equipment disposition procedures
 - vi. Adequate safeguards related to loss, damage, or theft of equipment.
 - vii. Funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.
 - viii. Equipment use for Title I, Part A TA programs.
 - ix. Equipment used for private schools.
 - x. Maintenance procedures to keep the property in good condition.

5.2 INVENTORY INTERNAL CONTROLS

Explanation – Evidence/Documentation (5.2.B-D)

EVIDENCE OF IMPLEMENTATION

2. Inventory internal controls evidence shall include:
 - B. All purchase orders documenting purchases of equipment with federal funds.
 - C. Inventory records with all required components in CFR 200.313(d)
 - D. Records/logs of dates (at least once every two years) that physical inventories were conducted at LEA and schools with date, and signatures of person conducting inventory.

5.2 INVENTORY INTERNAL CONTROLS

Notes About Consolidation of Funds

NOTES ABOUT CONSOLIDATION OF FUNDS

- LEAs do not have to provide inventory records for items purchased with Fund 150 in alignment with schoolwide plans.
- Inventory records for any federal fund other than Fund 150 must be provided in monitoring until the program has been consolidated 5 years and must be maintained locally until all inventory has reached the end of its useful life and has been disposed.

5.2 INVENTORY INTERNAL CONTROLS

Notes About Transferability

NOTES ABOUT TRANSFERABILITY

Inventory will be reviewed for all grants whether funds have been transferred or not.

5.2 INVENTORY INTERNAL CONTROLS

Common Misunderstandings

- LEAs must provide complete inventory documentation, i.e. **all** required elements and **all** equipment purchased.
- LEAs must conduct a physical inventory every two years, for all federal programs not just Title I, Part A programs.
- Inventory has two components:
 - the complete inventory list.
 - the physical inventory which contains signatures and dates.
- The number of years equipment must remain on inventory after disposal (3 years is correct number of years 2 CFR 200.334(c)).

5.3 CASH MANAGEMENT INTERNAL CONTROLS

Explanation – Monitoring Indicator Requirements

REQUIREMENTS

- Cash management internal controls specific to the drawdown of funds required to be in writing by [2 CFR Part 200](#) are present and meet requirements for internal controls.
- The LEA minimizes the time elapsing between the transfer of funds and disbursement by the grantee or subgrantee.
- The LEA's requests for federal funds are evaluated, and drawdowns of federal cash are only for immediate needs.
- The LEA reconciles drawdown requests as needed and maintain supporting documentation.

[Federal Programs Handbook](#); [2 CFR 200.302 \(b\)\(6\)](#); [2 CFR 200.303\(a\)](#); [2 CFR 200.305](#); [GAO-14-704G -10.03, 10.12-10.14](#).

5.3 CASH MANAGEMENT INTERNAL CONTROLS

Explanation – Evidence/Documentation

EVIDENCE OF IMPLEMENTATION

3. Cash management internal controls evidence shall include:
 - A. Written procedures for cash management (payment).
 - B. FY22 & FY23 DE0147s selected by each federal program being monitored. Include supporting accounting records.
 - C. LEA reconciliation of drawdown requests and supporting documentation.

5.3 CASH MANAGEMENT INTERNAL CONTROLS

Notes About Consolidation of Funds

NOTES ABOUT CONSOLIDATION OF FUNDS

This indicator is impacted by consolidation. LEAs must provide documentation listed in 5.3 A-C. In addition, LEAs must also provide local documentation supporting how drawdowns are calculated.

5.3 CASH MANAGEMENT INTERNAL CONTROLS

Notes About Transferability

NOTES ABOUT TRANSFERABILITY

- Title II, Part A and Title IV, Part A will check to ensure that transferred funds have been drawn down first before the receiving program.
- Reviewed by the receiving program in accordance with its fiscal requirements.
- Drawdowns should be supported by documentation of expenditures.

5.3 CASH MANAGEMENT INTERNAL CONTROLS

Common Misunderstandings

- Drawdown amounts or percentages (COF) should be aligned to expenditures.
- There must be complete supporting documentation for each drawdown.

Feedback

Please provide us with feedback by completing our short survey. The survey can be accessed by QR code or the abbreviated link below.



OR

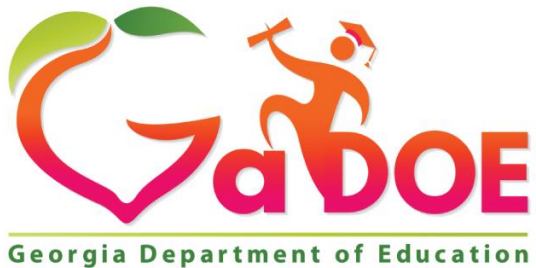
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