

Rejection: It Hurts! How to get your Title II, Part A Budget Approved



FY20 GCEL Conference

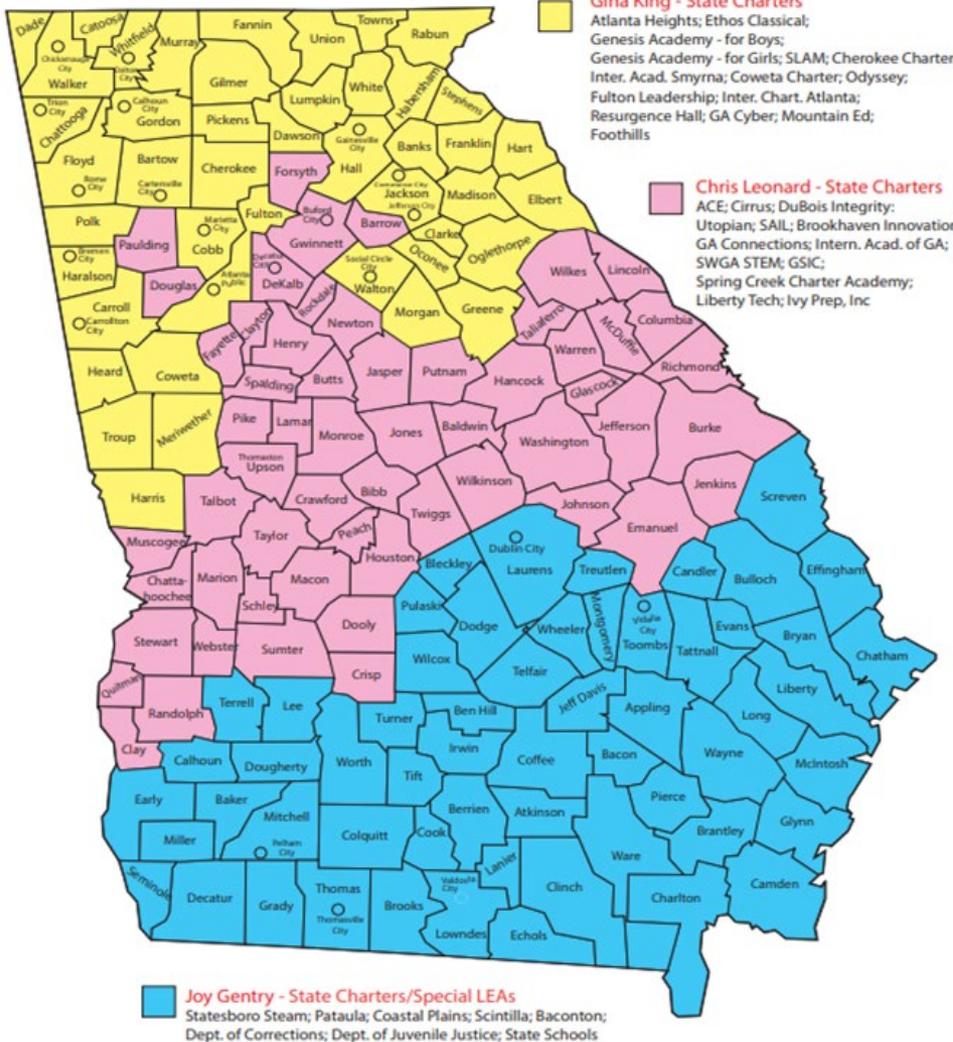
Title II, Part A Education Specialists

March 2020

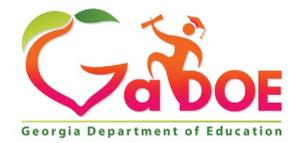
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Georgia Department of Education
 Title II, Part A
 Program Manager, Terri Still
 Title II, Part A Education Specialists – LEA Assignments
 Effective 01.01.20



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Title II, Part A Program Information

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The screenshot displays the Georgia Department of Education (GaDOE) website. At the top left is the GaDOE logo with the text "Georgia Department of Education". At the top right is a search bar and social media icons. Below the logo is the name "Richard Woods, Georgia's School Superintendent". A green navigation bar contains the following menu items: "Offices & Divisions", "Programs & Initiatives", "Data & Reporting", "Learning & Curriculum", "State Board & Policy", "Finance & Operations", "Contact", and "Calendar".

On the left side, there are two main vertical menus. The first menu, under "Teaching and Learning", includes: "Curriculum & Instruction", "Georgia Virtual Learning", "Student Support Teams", and "Teacher and Leader Support and Development". The second menu, under "Technology Services", includes: "Data Collections", "Georgia's Statewide Longitudinal Data System", "Infrastructure", "Instructional Technology", and "PCGenesis". Below these is a menu for "Career, Technical, Agricultural Education".

On the right side, there is a "Federal Programs" page. The page header includes the GaDOE logo, search bar, and superintendent's name. The navigation bar is identical to the main site. The page content includes a breadcrumb trail: "Home -> School Improvement -> Federal Programs". The "Federal Programs" section lists various programs such as "Title I, Part A Improving Academic Achievement of the Disadvantaged", "Title I, Part A - Academic Achievement Awards", "Title I, Part A - Foster Care Program", "Title I, Part A - Family-School Partnership Program", "Title I, Part C - Education of Migratory Children", "Title I, Part D - Programs for Neglected or Delinquent Children", "Title II, Part A - Supporting Effective Instruction", "Title III, Part A - Language Instruction for English Learners and Immigrant Students", "Title IV, Part A - Student Support and Academic Enrichment", "Title IV, Part B, Nita M. Lowey - 21st Century Community Learning Centers", and "Title V, Part B - Rural Education Initiative".

Two red callout boxes with numbers are present. Callout 1 is a circle with the number "1" and a red arrow pointing to the "Career, Technical, Agricultural Education" menu item. Callout 2 is a circle with the number "2" and a red arrow pointing to the "Resources" section of the Federal Programs page, which lists items like "Federal Programs Monitoring", "LEA Consolidated Application", "Federal Programs Handbook", "Professional Qualifications and Related Reporting Requirements", "Consolidation of ESSA Administrative Funds LEA Request Form", "Intra District Transfers", "AdvancEd GaDOE Partnership Brochure", and "New Directors Online Course Series".

ESSA Section 2001 – Purpose

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What is the purpose of Title II, Part A?

The purpose of this title is to provide grants to State educational agencies and sub-grants to local educational agencies to—

- (1) increase student achievement consistent with the challenging State academic standards;
- (2) improve the quality and effectiveness of teachers, principals, and other school leaders;
- (3) increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools;
- (4) provide low-income and minority students greater access to effective teachers, principals, and other school leaders.

Supplement Not Supplant

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Funds made available under Title II, Part A shall be used to supplement and not supplant non-federal funds that would otherwise be used for activities authorized under Title II, Part A (Sec. 2301)

When determining whether an expenditure would create a presumption of supplanting, the LEA should consider these questions:

Is the program or activity that the LEA wants to fund required under state, local, or another federal law? If it is, then it may be supplanting.

Were state or local funds used in the past year to pay for the program or activity? If they were, it may be supplanting.

Grant Period of Performance

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Period of Performance (27 months)

- Original - July 1 - September 30 (15 months)
- Carryover – October 1 - September 30 (12 months)

How Period of Performance Influences Purchasing:

- Generally, purchases should occur and be paid for within the original 15 months. Purchases should benefit the current fiscal year.
- Multi-year contracts/ licenses that extend beyond the period of performance are allowable. Multi-year contracts may be more cost effective. However, the contract should include language clarifying “pending funding availability”. It is a best practice to align contracts/ licenses to period of performance.

Agenda

Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved
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- **Section I: Title II, Part A Budget Resources**
- **Section II: Completing The Grant Budget**
- **Section III: Budget Tips and Reminders**
- **Section IV: Title II, Part A Budget Updates**

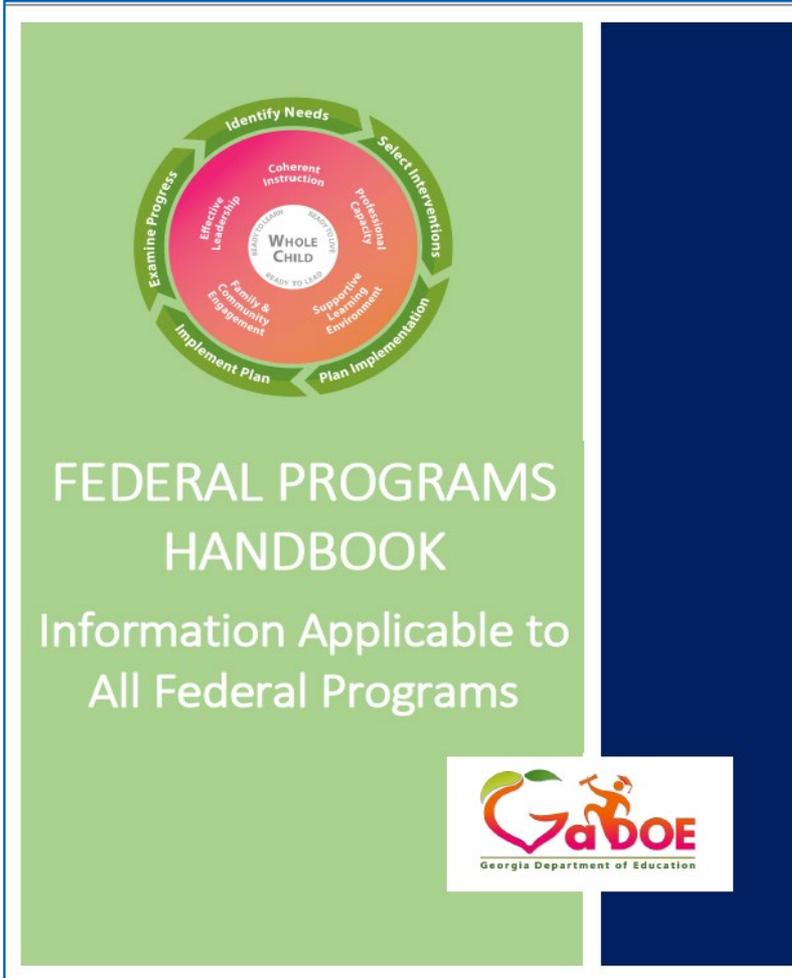
SECTION I:

Title II, Part A

Budget Resources

Budget Resources

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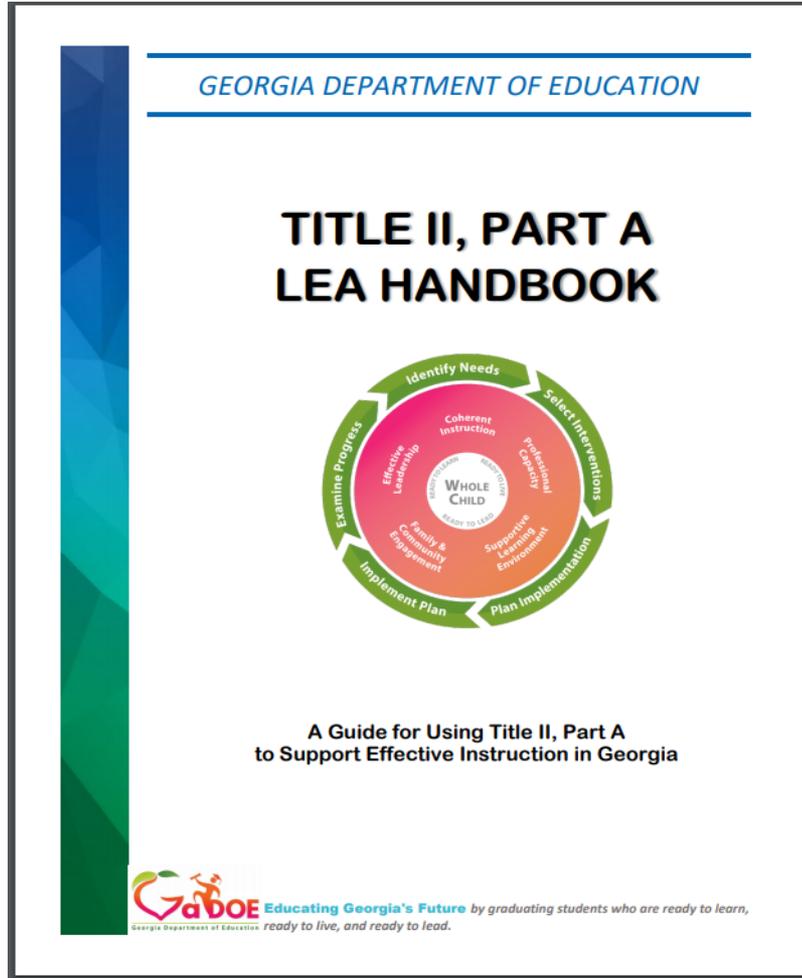
The cover features a circular diagram at the top with the 'WHOLE CHILD' logo in the center. The diagram is divided into six segments: Identify Needs, Select Interventions, Plan Implementation, Implement Plan, Examine Progress, and Effective Leadership. The central logo includes the text 'WHOLE CHILD' and 'READY TO LEARN'. Below the diagram, the text reads 'FEDERAL PROGRAMS HANDBOOK' and 'Information Applicable to All Federal Programs'. At the bottom right is the GaDOE logo.

**FEDERAL PROGRAMS
HANDBOOK**

Information Applicable to
All Federal Programs



Georgia Department of Education



The cover features a circular diagram at the top with the 'WHOLE CHILD' logo in the center. The diagram is divided into six segments: Identify Needs, Select Interventions, Plan Implementation, Implement Plan, Examine Progress, and Effective Leadership. The central logo includes the text 'WHOLE CHILD' and 'READY TO LEARN'. Below the diagram, the text reads 'TITLE II, PART A LEA HANDBOOK' and 'A Guide for Using Title II, Part A to Support Effective Instruction in Georgia'. At the bottom left is the GaDOE logo.

GEORGIA DEPARTMENT OF EDUCATION

**TITLE II, PART A
LEA HANDBOOK**

A Guide for Using Title II, Part A
to Support Effective Instruction in Georgia



Georgia Department of Education Educating Georgia's Future by graduating students who are ready to learn,
Georgia Department of Education ready to live, and ready to lead.

Budget Resources

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Georgia Department of Education

Search this site... 

Richard Woods, Georgia's School Superintendent

Offices & Divisions ▾ Programs & Initiatives ▾ Data & Reporting ▾ Learning & Curriculum ▾ State Board & Policy ▾ Finance & Operations ▾ Contact ▾ Calendar ▾

Home → School Improvement → Teacher and Leader Effectiveness → Title II, Part A Supporting Effective Instruction Grant

Office of Teaching and Learning

Teacher and Leader Support and Development

Title II, Part A

Georgia's Systems of Continuous Improvement

Teacher Keys Effectiveness System

Leader Keys Effectiveness System

Teacher/ Leader Induction Guidance

Professional Learning/ Resources

GaDOE Electronic Platform

Title II, Part A Supporting Effective Instruction Grant

Mission

Our mission is to provide technical assistance, resources, and program monitoring to local education agencies in support of the United States Department of Education's Title II, Part A Supporting Effective Instruction Grant's purpose of increasing academic achievement by improving the effectiveness of teachers, principals and other school leaders.

Program Overview

Title II, Part A was originally authorized as Eisenhower Professional Development and the Class Size Reduction programs under the Elementary and Secondary Education Act (ESEA) of 1965, was reauthorized in 2001 by the No Child Left Behind Act (NCLB) and in 2015 by the Every Student Succeeds Act (ESSA). While ESSA was authorized in December of 2015, the Consolidated Appropriations Act of 2016 extended the date by which certain parts of the Act would be effective. ESSA is in full effect as of July 1, 2017. Further guidance has been provided by USDE in the form of Dear Colleague Letters and FAQs.

Contact Information Grant Administration

Regional Service List and State Map
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Scroll down for links to other pages



Function and Object Code Quick Guide

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Title II, Part A		Fund Code – 414	Program Code - 1784
Function	Object	Application of LUA in Title II, Part A	
1000 Instruction	110	Class Size Reduction Teacher (CSR) - ESSA Sec. 2103 Local Uses of Funds (D)	
	113	Substitute for Class Size Reduction Teacher	
	199	Teacher Recruitment/ Retention Incentive - ESSA Sec. 2103 Local Uses of Funds (B)(C)	
	210 - 290	CSR Benefits: State Health Insurance (210), FICA (220), Teachers Retirement System (230), Unemployment (250), Workman's Compensation (260), Benefit in Lieu of Soc. Sec. (280), Other Employee Benefits (290)	
	300	Contracted Services for CSR Teacher, Contracted Services for Substitute for CSR Teacher	
	881	Transfer to Schoolwide Budget (Fund 400) or Schoolwide Consolidation (Fund 150)	
2100 Pupil Services	116	Stipends for Attending Professional Development (PD): School Counselors/Psychologists/Social Workers/Nurses Attending In-service Training in Mental Illness, Safety, Peer Interaction, Drug & Alcohol Abuse, Chronic Absenteeism, and Child Sexual Abuse - ESSA Sec. 2103 Local Uses of Funds (I)(L)	
	210 - 290	Benefits for Stipends for Attending Professional Development: State Health Insurance (210), FICA (220), Teachers Retirement System (230), Unemployment (250), Workman's Compensation (260), Benefit in Lieu of Soc. Sec. (280), Other Employee Benefits (290)	
2213 Guidance	O.C.G.A. 20-14-49.11 requires GaDOE to report at the school level, budget, and expenditure information. This includes "The cost of all professional development, including training, materials, and tuition provided for instructional staff or to report professional development costs, including substitute Service Improvements such as technol professional development costs for other in the functional categories that their sa (E)(F)(G)(H)(I)(J)(L)(M)(O) for allowable		
	113	Substitute (Temporary Empl	
	114	Substitute (Temporary Empl	
	116	Professional Development St	
	190	Salary for Instructional Leade Supervisory Position)	
	191	Salary for Instructional Leade Instructional Coaches)	
	199	Compensation for Instruction Compensation for Capacity B Leadership Roles/Responsib	
	210 - 290	Benefits for Instructional Staff (220), Teachers Retirement S (280), Benefit in Lieu of Soc.	
	300	Contracted Services for PD k Instruct. Staff	
	361- 362	Per Diem for Consultants Pro reimbursing travel expenses	
	441	Professional Development R	
	442	Professional Development Te	
	532	Annual or Short-Term Softwa	
580	PL - Travel for Instructional Staff Attending PD Training Outside LEA (Use Object 890 for Private Schools)		
595	Other Purchased Services (Consult Title II, Part A Specialist) May be used for purchasing registration for Private School Teachers/Principals (non-employees)		
610	Supplies for Current Year PD Training Activities for Instructional Staff		

Title II, Part A Budget Function and Object Code Quick Guide based on the Georgia Department of Education LUA Chart of Accounts

2213 Instructional Staff Training		
199	Compensation for Instructional Staff Providing PD Beyond Contract to Instructional Staff; Compensation for Capacity Building of Title II, Part A Allowable Staff through Increased Leadership Roles/Responsibilities	
210 - 290	Benefits for Instructional Staff Receiving or Providing PD: State Health Insurance (210), FICA (220), Teachers Retirement System (230), Unemployment (250), Workman's Compensation (260), Benefit in Lieu of Soc. Sec. (280), Other Employee Benefits (290)	
300	Contracted Services for PD for Instructional Staff: Outside Consultants; Contracted Subs for Instruct. Staff	
361- 362	Per Diem for Consultants Providing PD Services to Instructional Staff 362 - May be used for reimbursing travel expenses for Private School Teachers/Principals (non-employees)	
441	Professional Development Room Rental	
442	Professional Development Technology Rental	
532	Annual or Short-Term Software Licensing or Subscriptions for Instructional Staff	
580	PL - Travel for Instructional Staff Attending PD Training Outside LEA (Use Object 890 for Private Schools)	
595	Other Purchased Services (Consult Title II, Part A Specialist) May be used for purchasing registration for Private School Teachers/Principals (non-employees)	

Source Documentation Quick Guide

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Refer to Title II, Part A Handbook

Budget Codes	Suggested Source Documentation (If prorated, full breakdown of associated expenses)
1000 113 2213 113 Substitutes	<ul style="list-style-type: none"> Substitute Name, Date of Service Teacher Name, Grade, Content, Activity Attended Documentation to Verify Attendance and Determine Allowability of Activity (Agenda, PPT, Sign-in sheets, etc.) Proof of Title II, Part A Coordinator Authorization Time and Effort Documentation
1000 199 Financial Incentives	<ul style="list-style-type: none"> Documentation of Teacher Recruitment/Retention Financial Incentive
2100 116 2213 116 2220 116 Stipends to Attend PD	<ul style="list-style-type: none"> Teacher Name, Grade, Content, Activity Attended Documentation to Verify Attendance and Determine Allowability of Activity (Sign-in sheets, etc.) Proof of Title II, Part A Coordinator Authorization Evidence of compliance with Stipend Policy Time and Effort Documentation
2213 199 Additional Compensation to Provide PD	<ul style="list-style-type: none"> Documentation of Providing PD: Sign-in with Teacher Name, Grade, Content Documentation to Determine Allowability of PD Activity (Agenda, PPT, etc.) Proof of Title II, Part A Coordinator Authorization Time and Effort Documentation
2213 199 Additional Compensation to Mentor	<ul style="list-style-type: none"> Documentation of Mentoring: Mentor/ Mentee Assignments w/ Teacher Name and Content Documentation of Mentoring Activities (Log, Feedback, etc.) Approved Mentor Job Description Proof of Title II, Part A Coordinator Authorization Time and Effort Documentation
2400 199 Financial Incentives	<ul style="list-style-type: none"> Documentation of Recruitment/Financial Incentives for Principals and Assistants
2213 300 Contracted/ Purchased Services	<ul style="list-style-type: none"> Detailed Purchase Order and/ or Invoice and Check Contract/ Agreement with deliverables, timeline, etc. Documentation of Compliance with Federal Purchasing Requirements (UAR § 200.320(b-c)) <ul style="list-style-type: none"> Single Purchase – Aggregate cost over \$10,000 - 2 or more price/ rate quotations Single Purchase – Aggregate cost over \$250,000 - a copy of bid formal advertising or copy of competitive proposals A copy of any deliverables that should have been received prior to payment include sign-in sheets, training materials, etc. Sign-in sheets should include grade/ content Proof of Title II, Part A Coordinator Authorization
2213 580 (PD) 2230 580 (Admin) 2800 580 (Recruit) Travel	<ul style="list-style-type: none"> Recipient Name, Position (if applicable grade, content), Activity Attended Documentation of Allowability of Activity. This may include, but is not limited to Training Materials with Sessions Attended Highlighted Documentation to Verify Costs Incurred: Mileage Form, Proof of Airfare, Hotel, Transportation and Luggage Check Receipts Documentation to Determine Scope of Costs was Approved Prior to Travel: Authorization Proof of Title II, Part A Coordinator Authorization Timeline/Plan for Redelivery
2213 610/611 Supplies	<ul style="list-style-type: none"> Detailed Purchase Order and/ or Invoice and Check Associated Description to Determine Allowability Proof of Title II, Part A Coordinator Authorization

Budget Codes	Suggested Source Documentation (If prorated, full breakdown of associated expenses)
2213 532/612 Software	<ul style="list-style-type: none"> Detailed Purchase Order and/ or Invoice (with start and end licensing dates) and Check Associated Activity/ Description to Determine Allowability If prorated, a full breakdown of associated expenses Documentation of Compliance with Federal Purchasing Requirements (UAR § 200.320(b-c)) <ul style="list-style-type: none"> Single Purchase – Aggregate cost over \$10,000 - 2 or more price/ rate quotations Single Purchase – Aggregate cost over \$250,000 - a copy of bid formal advertising or copy of competitive proposals Proof of Title II, Part A Coordinator Authorization
2213 615/616 Equipment	<ul style="list-style-type: none"> Detailed Purchase Order and/ or Invoice and Check Associated Purpose/ Intended Use to Determine Allowability If prorated, a full breakdown of associated expenses Documentation of Compliance with Federal Purchasing Requirements (UAR § 200.320(b-c)) <ul style="list-style-type: none"> Single Purchase – Aggregate cost over \$10,000 - 2 or more price/ rate quotations Single Purchase – Aggregate cost over \$250,000 - a copy of bid formal advertising or copy of competitive proposals Proof of Title II, Part A Coordinator Authorization
2213 642 2230 642 Books	<ul style="list-style-type: none"> Detailed Purchase Order and/ or Invoice and Check Associated Activity and Audience to Determine Allowability Documentation of Compliance with Federal Purchasing Requirements (UAR § 200.320(b-c)) <ul style="list-style-type: none"> Single Purchase – Aggregate cost over \$10,000 - 2 or more price/ rate quotations Single Purchase – Aggregate cost over \$250,000 - a copy of bid formal advertising or copy of competitive proposals
2213 810 2800 810 Registration	<ul style="list-style-type: none"> Detailed Purchase Order and/ or Invoice and Check Recipient Name, Position (if applicable grade, content), Activity Attended Documentation to Determine Activity is Allowable. This may include, but is not limited to: Session Descriptions, Session Agenda, Training Materials Evidence of how PL is ongoing, job embedded, etc. <ul style="list-style-type: none"> For personnel other than teachers or leaders – evidence of training provided to teachers and/or school leaders that is ongoing, job embedded, etc. If prorated, a full breakdown of associated expenses Proof of Title II, Part A Coordinator Authorization
2800 530 Recruitment Advertising	<ul style="list-style-type: none"> Detailed Purchase Order and/ or Invoice and Check Copy of the print (newspaper, journal, magazine), brochures, programs, virtual (webpage), and/ or radio (transcript) ad as proof of services rendered and allowability Proof of Title II, Part A Coordinator Authorization
Function/ Object Vary P-Card Purchases	<ul style="list-style-type: none"> P-Card Statement Source Documentation as Listed in Categories Above Proof of Title II, Part A Coordinator Authorization (p-card procedures must include program authorization)
Function/ Object Vary Journal Entries	<ul style="list-style-type: none"> Proof of Journal Entry from One Fund Source to Title II, Part A Source Documentation as Listed in Categories Above Proof of Title II, Part A Coordinator Authorization of Transfer

Evidence-Based

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Which Title II, Part A Funded Activities Must Have an Evidence Base?

Section 8101 [20 USC 7801] Definitions: (21) EVIDENCE-BASED.

(A) IN GENERAL. —Except as provided in subparagraph (B), the term “evidence-based”, when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that—

(i) demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on—

(I) strong evidence from at least 1 well-designed and well-implemented experimental study;

(II) moderate evidence from at least 1 experimental study; or

(III) promising evidence from at least 1 study with statistical correlation.

(ii) (I) demonstrates a rational relationship between such activity, strategy, or intervention and the outcomes; and
(II) 11 includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

(B) DEFINITION FOR SPECIFIC ACTIVITIES FUNDED UNDER THIS ACT. —When used with respect to interventions or improvement activities or strategies funded under section 1003, the term “evidence-based” means a State, local educational agency, or school activity, strategy, or intervention that meets the requirements of subclause (I), (II), or (III) of subparagraph (A)(i).

- Reducing class size to a level that is **evidence-based** to improve student achievement through the recruiting and hiring of additional effective teachers
- Providing high-quality, personalized professional development that is **evidence-based**

Sec 2103(b)(3)(D&E)

Evidence-Based Resources

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USDE:

*Non-Regulatory
Guidance: Using Evidence
to Strengthen Education
Investments (2016)*



Georgia:

Federal Programs
Handbook, Ch. 9
Sample Documentation of
Evidence-based (I-III)
Sample Logic Models



Websites:

What Works Clearinghouse
<http://ies.ed.gov/ncee/wwc>
Evidence for ESSA
<http://www.evidenceforessa.org/>
Best Evidence Encyclopedia
<http://www.bestevidence.org/>

Time and Effort Quick Guide

Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved FY20 GCEL Conference



Title II, Part A Time and Effort Quick Guide
Documenting Personnel Expenses
Funded by Title II, Part A
Based on \$200,430

This quick guide is not intended to replace the Title II, Part A LEA Handbook or Federal Law or Guidance

The guidance below is intended to assist LEAs in appropriately documenting personnel expenses for individuals for whom any part of their salary and wages is charged to Title II, Part A. Charges to Title II, Part A for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated
- Be incorporated into the official records of the non-Federal entity
- Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities
- Support the distribution of the employee's salary and wages among the various funding sources on which the employee works on a regular basis.

EDGAR, 2 C.F.R. Part 200 – Uniform

Important Definitions
(excerpted from Actions to Ease the Burden of Title II, Part A Reporting Requirements)

- **Periodic/Semiannual Certification:** Certification completed to verify periodic certification. Complete
- **Personnel Activity Report:** Report completed to support employee's salary and wages.
- **Single Cost Objective:** A cost objective even if the employee is working full, from each of the funding sources.
- **Multiple Cost Objective:** A cost objective supported by multiple funding sources.

SAMPLE SCENARIOS TO ASSIST TITLE II, PART A LEA COORDINATORS IN DETERMINING DOCUMENTATION FOR PERSONNEL EXPENSES				
(All positions, substitutes, stipends and additional compensation must be included in approved budget)				
Personnel Expenditure	Funding Source(s)	Job Description	Required Time and Effort Documentation	Required Allowability Documentation
Salary/Additional Compensation for Teacher or School Leader Mentor (2213 - 199)	Fully or Partially Funded by Title II, Part A and other funding source(s)	Teacher Mentor or Leader Mentor provides mentoring to teacher recipient or assistant principal/ principal (single cost objective).	<ul style="list-style-type: none"> • Periodic Certification identifying the mentor name, job title (teacher/mentor, principal/mentor, teacher mentor, school leader mentor). If teacher, must include position, site/school, fund source(s), and authorizing signature. 	<ul style="list-style-type: none"> • Allowability Documentation: Documentation that connects the name of the mentor, name of mentee, position of mentee. If teacher, must include position, site/school, amount of payment for mentoring services provided. Job description must be attached in ConApp. • Procedures for awarding salary/ additional compensation. <p><i>Funds may be used to compensate teacher leaders and school leaders for increased leadership roles and responsibilities. ESSA 2103 (b)(3)(B)</i></p>
Salary for Class Size Reduction Teacher (1000 110)	Wholly or Partially Funded by Title II, Part A	Title II, Part A class size reduction (CSR) teacher reducing class size in a course allowable under all funding sources (single cost objective). <small>(CSR teacher must be included in approved budget; and, corresponding required documents must be on file.)</small>	<ul style="list-style-type: none"> • Periodic Certification identifying the teacher name, school, fund source and authorizing signature. • School Master Schedule that aligns with the class size reduction worksheet designating segments reduced. 	



Drawdown of Federal Funds §200.305(b)

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What is your role in requesting grant drawdowns?

Draw Downs

Local educational agencies (LEAs) that participate in Federal Programs with the Georgia Department of Education (GaDOE) will draw down Federal funds on a reimbursement basis for all allowable expenditures incurred in their respective participating Federal Program(s). An incurred expenditure will be defined as an expenditure for goods and/or services that the LEA has received, even if no payment was made. This will include goods and services received such as salaries, consumed utilities, rent, and supplies.

The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (also known as the Uniform Administrative Requirements, 2 CFR Part 200, or UAR) requires all Federal programs to have written procedures to implement the 200.302). These procedures include Government and how GaDOE will each month. Therefore, it is the as to how LEAs will receive their

Federal Programs
Handbook P. 37

200.305) allows for two methods of reimbursements to Federal program participants: advance payments and reimbursements.

Advance payments to a non-Federal entity must be limited to the minimum amounts needed and be timed to be in accordance with the actual, immediate cash requirements of the non-Federal entity in carrying out the purpose of the approved program or project. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the non-Federal entity for direct program or project costs and the proportionate share of any allowable indirect costs.¹

If the requirements for advance payments above cannot be met, then reimbursement is the preferred method. Additionally, at any time, GaDOE, per § 200.305(b)(3), can require LEAs to request payments by reimbursement.

It is the procedure in Grants Accounting, due to system limitations in the Grants Accounting Online Reporting System (GAORS), that LEAs are limited to one drawdown each month (15 payments for Federal grants) during the grant period. The cut off for monthly drawdowns will be each Thursday at 3 PM, with funds disbursed to the LEA the subsequent Thursday. Therefore, since GaDOE cannot guarantee the timing and amount of the advance payments will be as close as administratively feasible to the actual payment of the advance (usually 3 days) with one drawdown per month, it is the procedure of GaDOE that all disbursements to LEAs will be reimbursement for all allowable incurred Federal program expenditures.

- Review and revise LEA internal controls **that reflect actual practice based on guidance**
- Review and make appropriate adjustments **before** authorizing grant drawdowns prior to the LEA finance officer requesting funds
- Ensure that funds drawn down align with the LEA's general ledger
- LEAs should not draw down more than expended

SECTION II: Completing The Title II, Part A Grant Budget

Required Use of Funds

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PRIORITIZING FUNDS – 2102 (b)(2)(C)

All LEAs must prioritize Title II, Part A funds to schools that are (1) state identified [comprehensive (CSI) and /or targeted (TSI)] AND (2) which have the highest poverty unless those schools' needs are met through other resources. If other resources are used, justification for not prioritizing to those schools must be provided.

** Remember that expenditures must meet purpose of Title II, Part A grant. LEAs may budget other funds to achieve these requirements, however this must be documented prior to budget approval*

PRIVATE SCHOOLS – 2101(d)(2)(I) and Sec. 8501

The LEA must comply with providing equitable services to private schools located within the LEA's **geographic^{*} boundaries** for Title II, Part A.

Prioritizing Funds

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Prioritize funds to:

- Address needs of the students, teachers and principals
- Select interventions/strategies that meet the purpose of the grant
 - Increase student achievement AND improve teacher/principal quality and effectiveness AND increase the # who are effective AND provide low income and minority students greater access to effective teachers/principals
- Select interventions/strategies that are allowable under the grant

Prioritize funds by:

- Allocating to LEA schools
- Allocating to CSI/TSI schools
- [CSI/TSI Link](#)

Attachment: Prioritizing Funds to School Level

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FY20 GCEL Conference



Richard Woods, Georgia's School Superintendent
"Educating Georgia's Future"

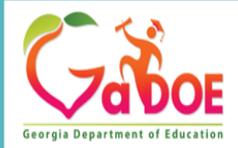
Title II, Part A Budget Attachment for LEAs Prioritizing Funds to the School Level

Under ESSA Section 2102, LEAs must use a portion of their federal dollars to address gaps in equity and support schools identified by states for improvement. As of December 2018, in consultation with USDE: Accordingly, an LEA must prioritize funds to schools served by the agency who are state identified as [Comprehensive Support and Improvement (CSI)/Targeted Support and Improvement (TSI)]. However, an LEA has discretion in how it prioritize these schools. For example, an LEA might allocate all or part of its Title II, Part A funds only to CSI schools, or to CSI and TSI schools, because those schools have the greatest need for Title II, Part A funds to improve academic achievement. On the other hand, an LEA might look at the needs of its CSI and TSI schools, consider all the funds from various sources available to meet those needs, and determine that, due to other available resources, a CSI or TSI school does not need priority for Title II, Part A funds. This would then make the Title II, Part A funds available to other priority schools in the LEA. LEAs without TSI/CPI schools who allocate to the school level must prioritize in accordance with Title II, Part A Intent and purposes. Specifically, LEAs should prioritize funds to increase student achievement and provide low-income and minority students greater access to effective teachers. In Georgia, LEAs who choose to allocate to the school level, must demonstrate this prioritization with budget submission. There is not one method for determining allocations. LEAs should choose a methodology that most closely aligns with the LEA's needs and resources and still in compliance with the law. Sample rationales are located on the next tab.

LEA Allocation					
Amount of Title II, Part A Funds Reser					
Brief rationale for how the LEA allocated Title II, Part A funds					
LEA School Name	State Identified (CSI/TSI)	Title I Status	% Poverty	% Minority	Amount of Title II, Part A Funds Allocated to School

Attachment: Equitable Services

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FY20 Title II, Part A Equitable Services Worksheet

If the Local Education Agency has participating private schools, then this worksheet should be uploaded as an attachment to the My GaDOE consolidated application with the original budget submission. Form must be uploaded as an excel document.

LEAs may enter information into white cells only. Light green cells contain formulas and should not be edited. Contact your Title II, Part A Specialists with questions.

LEA Name	LEA Enrollment	Private School Enrollment	LEA and Private School Enrollment	¹ Original Allocation	Admin Reservation	% of Allocation Reserved	Remaining Allocation	PPA	Total allocated to Private school	Remaining for LEA
						0	\$0	0	\$0	\$0
		0	0	² Reduction to Allocation	Admin Reservation	% of Allocation Reserved	Remaining Allocation	PPA	Total allocated to Private school	Remaining for LEA
						0	\$0	0	\$0	\$0
				³ Addition to Allocation	Admin Reservation	% of Allocation Reserved	Remaining Allocation	PPA	Total allocated to Private school	Remaining for LEA
						0	\$0	0	\$0	\$0
Private School Name	Enrollment	Original Allocation	Reduced Allocation	Increased Allocation	Carryover	ESSA: Explanation must be attached if LEA makes carryover available to private schools.				
		\$0	\$0	\$0		¹ Original allocation is the initial grant award from the SEA.				



Transferring Funds

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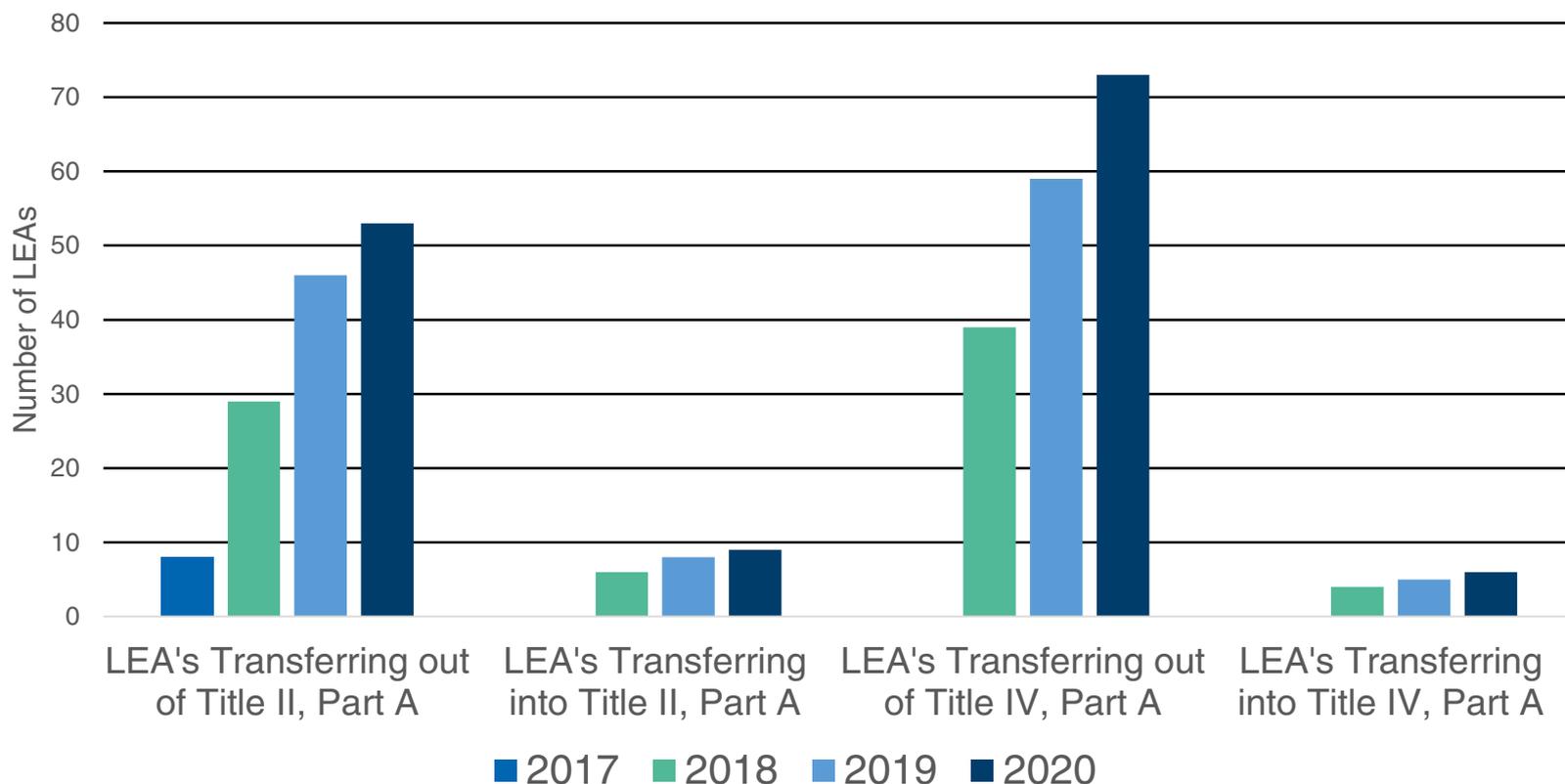
Transferring funds is a LEA decision, but LEAs must notify GaDOE by indicating in either the Online CLIP or S-CLIP. Benefits of transferring funds include:

- When transferring funds, the LEA chooses the amount to transfer, either 100% or a lesser amount allowing the LEA to fund LEA initiatives
- Transferring funds can be maximized and have increased availability by being moved into ESSA programs with no carryover limitation
- Transferring funds streamlines administration for LEAs and schools
 - CLIP, I&P, SWP, budgeting, monitoring, completion reports
- When transferring funds, LEAs can still carry out intent of original grants using the increased flexibility afforded by consolidation of federal and state funds

Transferring Funds

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Title II, Part A and Title IV, Part A Transfers



Private Schools and Transferability

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Transferability and Equitable Services

- ESEA section 5103(e)(2) gives LEAs flexibility to transfer some or all of their funds under certain ESEA programs to other eligible ESEA programs
- LEAs do not need prior approval from GaDOE to exercise the transferability authority, but before an LEA can transfer funds from Title II, Part A, it **MUST** engage in timely and meaningful consultation with appropriate private school offices

(Updated Non-Regulatory Guidance 10.7.19)

Private School Carryover

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Updated Non-Regulatory Guidance (10.07.19) Providing Equitable Service to Eligible Private School Children, Teachers, and Families

OBLIGATION OF FUNDS

Funds allocated to an LEA for educational services and other benefits to eligible private school children, their teachers, and their families must be obligated in the fiscal year for which the funds are received by the LEA. (ESEA section 1117(a)(4)(B)).

B-26. What is the purpose of the obligation of funds requirement given that an LEA may carry over funds from a given fiscal year and spend those funds in the succeeding fiscal year?
The purpose of this requirement is to ensure that an LEA obligates the funds available under Title I to provide equitable services in the fiscal year for which the funds are appropriated so that eligible students, teachers and other educational personnel, and families receive the services to which they are entitled in a timely manner. This provision reinforces the requirement that an LEA conduct timely consultation with private school officials to design appropriate equitable services so that those services can begin at the beginning of the school year for which the funds are appropriated.

Private School Carryover

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Updated Non-Regularly Guidance (10.07.19) – Providing Equitable Service to Eligible Private School Children, Teachers, and Families

B-27. May an LEA carry over unobligated funds despite the statutory requirement regarding obligation of funds?

If an LEA is providing equitable services as required and meeting the obligation of funds requirement in ESEA section 1117(a)(4)(B), it generally should not have any, and certainly not significant, carryover. The ESEA, however, does not prohibit carryover of funds for equitable services and, in most cases, requires it. The following are examples of circumstances that could result in carryover of equitable services funds and how an LEA would use such carryover:

Reason for Carryover	Use of Carryover
Services for eligible children in one or more private schools are delayed (e.g., based on a natural disaster, delayed consultation, inability to employ qualified personnel, or unexpected procurement challenges). As a result, the LEA is unable to fully provide required equitable services, and some funds are unobligated at the end of the Federal fiscal year.	The LEA must use the funds to provide equitable services to eligible children in the affected private schools the following year.



ES4PS & Administering 3 Years of Service

ES4PS IS ACCESSED BY LEAs IN SLDS THROUGH YOUR DISTRICT SIS.

From the landing page SELECT THE YEAR with which you are working. Remember, in one school year an LEA will be

- closing out the **previous year** of equitable services,
- providing **current year** equitable services
- inviting private schools to participate in the **upcoming year**



PREVIOUS YEAR

ES4PS FORM B
(Some LEAs)

In October, following the September 30 close of ESSA grants, LEAs must send Form B to participating private schools to ensure the services provided in the previous year were equitable.

CURRENT YEAR

OFFLINE
(Some LEAs)

From July 1 to September 30 LEAs will provide equitable services to private schools participating in the current year. Any documents that support implementation should be kept locally by the LEA for monitoring.

UPCOMING YEAR

ES4PS INVITATION
(All LEAs)

In early fall – usually by the end of October, LEAs should invite private schools to an initial consultation meeting to discuss participation in equitable services in the upcoming year.

UPCOMING YEAR

ES4PS FORM A
(All LEAs)

Once a private school has committed to participate in equitable services in the upcoming year, planning starts. Form A captures enrollment information or 'No participation' and is due prior to June 30.

EXAMPLE

In 2019-2020 LEA Federal Programs Directors will administer prior and upcoming years in ES4PS and the current year offline.

In October 2019, toggle to 2020-2021 to send invitations for the upcoming year.

By December 2019, toggle to 2018-2019 to send Form B for the previous year.

Prior to June 2020, toggle to 2020-2021 to send Form A for the upcoming year.

Ongoing – implement 2019-2020 equitable services offline and maintain documents.

New ES4PS Quick Guide for Toggling Years located on Ombudsman Webpage

<https://www.gadoe.org/School-Improvement/Federal-Programs/Pages/State-Ombudsman.aspx>

Writing Succinct Budget Descriptions

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Well developed descriptions:

- Illustrate allowability
- State Alignment to DIP Needs/ Equity Gaps/S-CLIP for every line item except 2230 & 2300
- Include the evidence-base for PD activities & CSR
- Address proration of jobs/ items
- Ensure correct indirect cost rate
- Prioritize High Poverty CSI/ TSI Schools
- Prioritize Low Performing High Poverty and High Minority Schools

Well Developed

Description

X

DIP Need 1: Salary for Academic Coach (30% Title II, Part A, 70% Title I) (Strong EB) shared between CSI and high poverty schools for job-embedded PD on middle school math (high needs area)

13	<p>BUDGET ALIGNMENT TO NEEDS & PLANS Budget aligns with LEA goals/needs as outlined in:</p> <ul style="list-style-type: none"> • SLDS: District Improvement Plan with Embedded LEA Equity Action Plan OR • S-CLIP: 3, 4.a, 4.c, 4.d Responses with attached LEA Equity Action Plan <p><i>Every budget line item (except Function Codes 2230 and 2300) directly asserts alignment with a Goal/Need, Equity Gap or S-CLIP Response.</i></p> <p><i>Every budget line item includes a reference to the evidence-based level (strong, moderate, promising or rationale/logic model) supporting the funded activity/strategy for Function Codes 2213 & 1000.</i></p> <p><i>Recommended format for budget descriptions: DIP Goal 1: Salary for Academic Coach (30% Title II, Part A, 70%</i></p>	Approved <input type="checkbox"/>	Edit Line Items for Alignment <input type="checkbox"/>	<input type="checkbox"/> DIP Goal/Need 1	
				<input type="checkbox"/> DIP Goal/Need 2	
				<input type="checkbox"/> DIP Goal/Need 3	
				<input type="checkbox"/> DIP Goal/Need 4	
			Edit Line Items for Evidence Base <input type="checkbox"/>	<input type="checkbox"/> Equity Gap 1	
				<input type="checkbox"/> Equity Gap 2	
				<input type="checkbox"/> S-CLIP 3	
				<input type="checkbox"/> S-CLIP <u>4.a</u>	
				<input type="checkbox"/> S-CLIP 4.c	

Writing Budget Descriptions

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Well Developed

Description

X

DIP/Overarching Need 1 Math PD Training to support **K-5 Title I elementary teachers'** implementation of **Do The Math (Strong EB)**

Well Developed

Description

X

DIP Goal #2 – Continue to improve middle school literacy - PD for **teachers and instructional coaches** in using formative assessments to identify student literacy needs
(Promising/Minimal EB)

Well Developed

Description

X

Equity Gap #2 Retention- Financial Incentives for **Other School Leaders** when providing job-embedded PD through **mentoring, training and support** to new (0-3yrs) **teachers**. Program design aligns with New Teacher Induction Program from New Teacher Center **(Demonstrates a Rationale)**

Writing Budget Descriptions

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Well Developed

Description

X

DIP Goal 1: Literacy PD Training to support K-2 Title I elementary teachers' implementation of Fountas & Pinnell Leveled Literacy Intervention (Strong EB)

Well Developed

Description

X

DIP Goal 2 – PD to improve middle school Math instruction - Books for teachers and instructional coaches in Math PLC Lesson Study on Algebraic representations (Promising/Minimal EB)

Well Developed

Description

X

Equity Gap #2 Retention Additional compensation for Other Schools Leaders when providing job-embedded PD through mentoring, training and support to new (0-3yrs) principals/assistant principals. Program design aligns with Leadership Guidance from New Teacher Center (Demonstrates a Rationale)

Title II, Part A Funded Job Descriptions

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- Job title included in the budget description needs to align with the job description
- If the job is not fully funded by Title II, Part A, list the percentage funded in the budget description and the job description
- If the job is fully funded by Title II, Part A, the job description can not include “other duties as assigned”

Title II, Part A funded job examples:

- Mentors
- Teacher Leaders
- Instructional Coaches
- School Level Professional Development Coordinator
- District Level Professional Development Coordinator

Monitoring Program Performance Requirements

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ESSA Section 2102(2)(D)

Each application shall include...a description of how the LEA will use data and ongoing consultation ... to continually update and improve activities supported under Title II, Part A.

2 CFR 200.328(a) Monitoring and Reporting Program Performance

The LEA is responsible for oversight of the operations of the Federal award supported activities. The LEA must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and that performance expectations are being achieved.

2 CFR 200.301 Performance Measurement (Effectiveness)

.....the Federal awarding agency must require the recipient to relate financial data to performance accomplishments of the Federal award.recipients must also provide cost information to demonstrate cost effective practices

Attachment: Effectiveness

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Title II, Part A FY20 Budget Attachment: Effectiveness
Upload to FY21 Consolidated Application Attachments Tab
Due October 1 (required prior to Budget Approval)

School Year	2020-2021	LEA Name		LEA Coordinator	
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Directions:

The Georgia Department of Education requires local education agencies (LEA) to determine the effectiveness of Title II, Part A funded activities (ESSA Section 2104(a)(1) and 2 CFR §200.301).

- The Title II, Part A Budget Attachment: Effectiveness below must be completed (Columns 1-6) for each Title II, Part A funded strategy/action step. The Title II, Part A Budget Attachment: Effectiveness must be uploaded to the Consolidated Application with the Title II, Part A Budget.
- Column 7, Effectiveness & Next Steps, is to be completed at the end of the fiscal year. The completed Title II, Part Budget Attachment: Effectiveness (Columns 1-7) must be uploaded to the Consolidated Application with the next year's Title II, Part A Budget. The data and analysis of data supporting the effectiveness described in Column 7 must be maintained in the LEA files.
- This portion of the form does not need to be completed by LEAs consolidating or transferring 100% of Title II, Part A Funds.

	Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7
	Goal/Need	Title II, Part A Funded Strategy	Allowability	Effectiveness Data	Administration	Timeline	Effectiveness & Next Steps
	Select from the dropdown the need aligned to the Title II, Part A funded strategy in column 2.	Title II, Part A Funded Strategies <i>[PL activities must align to ESSA Definition Sec. 8101(42) & SBOE Rule160-3-3-.04]</i>	Select from the dropdown the ESSA local use of funds that most closely authorizes the strategy. <i>[Sec. 2103]</i>	List data to be collected to monitor and measure effectiveness of funded strategies.	List person(s) (by position) responsible for collecting, coordinating and analyzing data to measure effectiveness.	Timeline for collecting coordinating and analyzing data.	AT THE END OF FY20... Select from the dropdown to assert the level of effectiveness of the IIA funded strategy. Provide a brief year-end summary of data and an analysis supporting the effectiveness assertion including the LEA's next steps for this funded strategy in the analysis.
1	<i>Select a Need</i>		<i>Select Use of Funds</i>				<i>Select End of Year Effectiveness</i> Explanation:

Attachment: Effectiveness Example

Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved FY20 GCEL Conference

School Year	2019-2020		LEA Name				LEA Coordinator		
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7			
Goal/Need	Title II, Part A Funded Strategy	Allowability	Effectiveness Data	Administration	Timeline	Effectiveness & Next Steps			
Select from the dropdown the need aligned to the Title II, Part A funded strategy in column 2.	Title II, Part A Funded Strategies <i>[PL activities must align to ESSA Definition Sec. 8101(42) & SBOE Rule160-3-3-.04]</i>	Select from the dropdown the ESSA local use of funds that most closely authorizes the strategy. <i>[Sec. 2103]</i>	List data to be collected to monitor and measure effectiveness of funded strategies.	List person(s) (by position) responsible for collecting, coordinating and analyzing data to measure effectiveness.	Timeline for collecting coordinating and analyzing data.	AT THE END OF FY20... Select from the dropdown to assert the level of effectiveness of the IIA funded strategy. Provide a brief year-end summary of data and an analysis supporting the effectiveness assertion including the LEA's next steps for this funded strategy in the analysis.			
1 <i>DIP Goal 1</i>	<ul style="list-style-type: none"> Reading consultant for each elementary school to provide PD, modeling and feedback to improve teachers' proficiency with teaching reading. PD provided to 6-8 teachers on using benchmark data to determine students' literacy needs. PD provided to high school ELA teachers on strategies to increase student Lexile scores. 	<i>Use of Funds E</i>	<ul style="list-style-type: none"> ELA Benchmark data Student Lexile Data from Georgia Milestones Assessment Student ELA scores from Georgia Milestones Assessment 	The Assessment Director will collect benchmark and GMA data and provide the data to the ELA Coordinator for documentation and analysis. Once the analysis is complete, the summary will be given to the Title II, Part A Coordinator.	Benchmark data: fall – due Oct. 30 winter – due Feb. 15 spring – due May 1 GMA data will be collected in June. Analysis of data to Title II, Part A Coordinator by June 30.	<i>Select End of Year Effectiveness Explanation:</i>			
2 <i>DIP Goal 1</i>	<ul style="list-style-type: none"> PD for K-5 teachers on using Number Talks to improve number sense. PD on Ascend Math for ESEP teachers. PD for 6-8 math teachers on using math benchmark data to identify students' needs. 	<i>Use of Funds E</i>	<ul style="list-style-type: none"> Math Benchmark data Student math proficiency levels on Georgia Milestones Assessment 	The Assessment Director will collect the data and provide it to the Math Coordinator for documentation and analysis. Once the analysis is complete, the summary will be given to the Title II, Part A Coordinator.	Benchmark data: fall – due Oct. 30 winter – due Feb. 15 spring – due May 1 GMA data will be collected in June. Analysis of data to Title II, Part A Coordinator by June 30.	<i>Select End of Year Effectiveness Explanation:</i>			

SECTION III:

Title II, Part A

Budget Tips

And Reminders

What can I do to get my budget approved quickly?

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Richard Woods, Georgia's School Superintendent
"Educating Georgia's Future"

TITLE II, PART A FY21 BUDGET REVIEW CHECKLIST

	Requirement	Approve	Revise		N/A	Status	Original Budget Comments
	Must include end of year data summary (column 7), analysis and next steps and be uploaded in the attachment tab of the Consolidated Application. <i>(Ineffective strategies should not be funded in FY20 without adjustments)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	In FY20 <input type="checkbox"/>	Attached <input type="checkbox"/>	
6	FY20 Approved CLIP LEA has an approved CLIP including Prayer Certification and GEPA 427.	CLIP Approved <input type="checkbox"/> Prayer Cert <input type="checkbox"/> GEPA 427 <input type="checkbox"/>	In Revision <input type="checkbox"/> Not Submitted <input type="checkbox"/>			Online CLIP <input type="checkbox"/> S-CLIP <input type="checkbox"/>	
7	REQUIRED ATTACHMENT: EFFECTIVENESS FY21 TITLE II, PART A BUDGET EFFECTIVENESS If applicable, LEA submits a plan outlining how the LEA will monitor for effectiveness of all Title II, Part A funded strategies. <i>• Not required for admin. costs in functions 2230 and 2300.</i> <i>• Not required for LEAs that transfer/consolidate 100% of funds.</i>	Complete <input type="checkbox"/>	Not Uploaded <input type="checkbox"/>	Needs Revision <input type="checkbox"/>	N/A* <input type="checkbox"/>	*N/A Only Applies to LEAs that Transfer/ Consolidate 100%	
8.a	PRIORITIZING FUNDS FOR COMPREHENSIVE & TARGETED SUPPORT AND IMPROVEMENT (CSI & TSI Schools) All LEAs must prioritize Title II, Part A funds to schools that are (1) state identified [comprehensive (CSI) and /or targeted (TSI)] unless other	School-Level Prioritization of Funds Worksheet Uploaded <input type="checkbox"/>	Not Uploaded <input type="checkbox"/>	Needs Revision <input type="checkbox"/>	LEA Level No TSI/CSI <input type="checkbox"/>	LEA has CSI <input type="checkbox"/>	



What can I do to get my budget approved quickly?

Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved FY20 GCEL Conference

- **USE THE BUDGET CHECKLIST & WRITE COMPLETE SUCCINCT DESCRIPTIONS**
- Use the Georgia LUA Chart of Accounts and Title II, Part A Function and Object Code Quick Guide
- Only budget items allowable under the Title II, Part A local use of funds (including content/focus and intended participants of the PD or in-service training – avoid acronyms)
- Only budget items that align with goals, equity gaps, and/or S-CLIP response
- Include evidence base for Professional Development (2213) and Class Size Reduction (1000)
- Ensure items are necessary, reasonable, allocable, and consistent with grant and 2 CFR requirements (including supplement v supplant)
- If coordinating funds for purchases include the percent funded by Title II, Part A (for example: contracts, personnel, equipment, and software)
- Ensure correct restricted indirect cost rate
- If applicable, include funding for identified CSI/ TSI Schools
- Label budget attachments consistently and identify grant

Allowability Essential Questions

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Essential Questions for Identifying and Planning for Title II, Part A Funded Activities/ Strategies

Does the activity/ strategy meet the purpose of Title II?

How is it the activity/ strategy aligned to the District Comprehensive Needs Assessment and District Improvement Plan?

Is the activity/ strategy one of the ESSA Title II, Part A Local Use of Funds Types of Activities? Is it a strategy recommended in the non-regulatory guidance Building Systems of Support for Excellent Teaching and Leading (2016)? If applicable, is each participant allowable under the Use of Funds?

Is the activity/ strategy evidence-based using the Title VIII d

If professional development, does the PD align with the Titl

Will the LEA be able to determine and report how the chosen principal or other school leader effectiveness? How will the

Is the activity/ strategy supplementing (not supplanting) non-federal funds that would otherwise be used for activities authorized under Title II?

Does the activity/ strategy comply with the Code of Federal Regulations (2 CFR Part 200, 34 CFR Part 76, 34 CFR Part 81)?

Reminder: All Title II, Part A funded strategies and activities must be aligned to an action step in the CLIP.

ESSA's Professional Development Definition

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Section 8101 [20 USC 7801] Definitions: (42) PROFESSIONAL DEVELOPMENT.

The term "professional development" means activities that

(A) are an integral part of school and local educational agency strategies for providing educators (including teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, and, as applicable, early childhood educators) with the knowledge and skills necessary to enable students to succeed in a well-rounded education and to meet the challenging State academic standards; **and**

(B) are sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused, and may include activities that

(i) improve and increase teachers'—

(I) knowledge of the academic subjects the teachers teach;

(II) understanding of how students learn; and

(III) ability to analyze student work and achievement from multiple sources, including how to adjust instructional strategies, assessments, and materials based on such analysis;

(ii) are an integral part of

(iii) allow personalized plan

observation or other f

(iv) improve classroom ma

(v) support the recruitment

certified through State

(vi) advance teacher unde

ESSA states explicitly that professional development is not stand-alone, one day or short-term workshops. Professional Development must be sustained, intensive, collaborative, job-embedded, data-driven and classroom-focused.

Everyone wants Title II, Part A money – what’s allowable?

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Every Student Succeeds Act ESSA Title II, Part A LEA Use of Funds and Title VIII Definitions Section 2103 [20 USC 6613] Local Uses of Funds

Authorized Use of Funds (A)

- (A) Developing or improving a rigorous, transparent, and fair evaluation and support system for teachers, principals, or other school leaders that
- (i) is based in part on evidence of student achievement, which may include student growth; and
 - (ii) shall include multiple measures of educator performance and provide clear, timely, and useful feedback to teachers, principals, or other school leaders.

Authorized Use of Funds (B)

- (B) Developing and implementing initiatives to assist in recruiting, hiring, and retaining effective teachers, particularly in low-income schools with high percentages of ineffective teachers and high percentages of students who do not meet the challenging State academic standards, to improve within district equity in the distribution of teachers, consistent with section 1111(g)(1)(B), such as initiatives that provide
- (i) expert help in screening candidates and enabling early hiring;
 - (ii) differential and incentive pay for teachers, principals, or other school leaders in high-need academic subject areas and specialty areas, which may include performance-based pay systems;
 - (iii) teacher, paraprofessional, principal, or other school leader advancement and professional growth, and an emphasis on leadership opportunities, multiple career paths, and pay differentiation;
 - (iv) new teacher, principal, or other school leader induction and mentoring programs that are designed to
 - (I) improve classroom instruction and student learning and achievement; and
 - (II) increase the retention of effective teachers, principals, or other school leaders;
 - (v) the development and provision of training for school leaders, coaches, mentors, and evaluators on how accurately to differentiate performance, provide useful feedback, and use evaluation results to inform decision making about professional development, improvement strategies, and personnel decisions; and
 - (vi) a system for auditing the quality of evaluation and support systems.

Refer to Title II, Part A Handbook

Title II, Part A Allowable Participants for PD

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Local Use of Funds/ Types of Activities	Participants (Please reference ESSA Section 2103)
A. Evaluation System	System is to support Teachers, Principals, Other School Leaders
B. Teacher Recruitment & Retention	R & R Activities for Teachers, Principals, Other School Leaders, Paraprofessionals, Coaches, Mentors, Evaluators
C. Recruitment from Other Fields	To become Teachers, Principals, Other School Leaders
D. Evidence – Based Class Size Reduction	Teachers
E. High Quality, Evidence-Based Personalized Professional Development	Teachers, Instructional Leadership teams, Principals, or Other School Leaders
F. Programs/ Activities to Increase Ability of Teachers to Teach SWD & EL	LEA/ School staff that will support teachers or direct support for teachers
G. Programs/ Activities to Increase Knowledge and Ability to Support Educators in Early Learning (through age 8) which may include PL and transition planning to Elementary	Knowledge - Teachers, Principals, Other School Leaders; Principal Support - Teachers, Teacher Leaders, Early Childhood Educators, school staff (paraprofessionals) and Other Professionals
H. Training, TA, Capacity Building	LEA/ School Staff that will Support Teachers, Principals and Other School Leaders or Direct Support for Teachers, Principals and Other School Leaders

Title II, Part A Allowable Participants for PD

Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved FY20 GCEL Conference

Local Use of Funds/ Types of Activities	Participants (Please reference ESSA Section 2103)
I. In-Service Training for School Personnel on Specific Topics	School Personnel
J. Training to Support the Identification of Gifted and Talented and High Ability	Recipients Not Specified
K. Supporting School Library Program' Instructional Services	Recipients Not Specified
L. Training for All School Personnel on Child Sexual Abuse	All School Personnel, including: Teachers, Principals, Other School Leaders, Specialized Instructional Support Personnel, and Paraprofessionals
M. Developing and Providing PD and Systems of Support Related to STEM and Computer Science	LEA/ School Staff that will Support Teachers, Principals and Other School Leaders or Direct Support for Teachers, Principals and Other School Leaders
N. Developing Feedback Mechanisms to Improve School Working Conditions	Recipients Not Specified
O. High Quality PD on Effective Strategies to Integrate Specific Topics to Help Prepare Students for Postsecondary and Workforce	Teachers, Principals, Other School Leaders
P. Other Evidence-Based Activities that Meet the Purpose of the Title *Requires State Consultation	Recipients Not Specified

06

Internal Controls

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Which internal controls are required to be in writing?

Internal Controls	Required in Writing
<p>§200.61-62 Establish and maintain effective internal control over the federal award that provides reasonable assurance that the non-federal entity is managing the federal award in compliance with federal statutes, regulations, and the terms and conditions of the federal award.</p>	<p>Allowability Procedures - §200.302(b)(7)</p> <p>Procurement Procedures (specific levels) - §200.319(c)</p> <p>Procurement: Competitive Proposals - Method for Conducting Technical Evaluations of Proposals and Selecting Recipients - §200.320(d)(3)</p>
<p>Internal control is “a process, effected by a LEA’s management personnel, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:</p> <ul style="list-style-type: none"> • Effectiveness and efficiency of operations • Reliability of financial reporting • Compliance with applicable laws and regulations” <p><i>Standards for Internal Control in the Federal Government, GAO-14-794G (The Green Book)</i></p>	<p>Conflict of Interest Policy - §200.318(c)</p> <p>Compensation – Personal Services (Time and Effort) §200.430</p> <p>Equipment Management Procedures § 200.313(d)</p> <p>Cash Management Procedures - §200.302(b)(6) and §200.305</p> <p>Segregation of Duties §200.303(a)</p> <p>Travel Policy - §200.474(b)</p> <p>Stipend Policy - §200.403(c), §200.404(e), and GaDOE Rule 160-3-3-.04</p>

Internal Control Quick Guide located in Title II, Part A Handbook

Internal Controls – Quick Guide

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Recommended & Required Internal Controls for LEAs

*** The controls/procedures referenced here are not all inclusive of all federal, state, and/or local requirements and were compiled based on OMB Uniform Administrative Requirements and corrective action as the result of state program monitoring. The best LEA procedures will govern federal and non-federal funds in a common manner to reduce the risk of noncompliance. The use of this document should be considered supplemental and does not supersede original federal, state or local laws, policies and guidance.*

Cost Principles

<u>Allowability</u>	2 CFR §§200.302(b)(7), 200.403(a) The LEA must have written internal controls to review any expenditures charged to the grant to ensure they are necessary, reasonable and allocable.	
Supplemental Use of Funds	ESEA Sec. 2123(b) The LEA must ensure all expenditures are supplemental in nature.	
<u>Source Documentation</u>	2 CFR §§200.302(b)(3), 200.403(g) The LEA must collect and maintain enough supporting documentation for each Title II, Part A expenditure to determine allowability.	
Period of Performance	2 CFR §200.77, 200.309, 200.403(g); 34 CFR §76.707 The LEA must ensure obligations and expenditures occur within the period of performance.	
Consistent Policies	Stipends	2 CFR §§200.403(c), 200.404(e), SBOE Rule 160-3-3-.04 The LEA must have written internal controls for granting stipends consistently with federal funds and nonfederal funds and compliant with State Board Rule.
	Travel	2 CFR §200.474(b), SBOE Rule 160-5-2-.23 The LEA must have written travel internal controls and a method for ensuring that charges are reasonable and consistent with the written travel policies. In the absence of LEA procedures, Federal rates and policies apply. The purpose of travel must be allowable.

Internal Control Quick Guide located in Title II, Part A Handbook

Internal Controls - Stipend Policy

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Required Components of Stipend Policy:

- Stipend Policy - LEAs must have a written stipend policy that includes SBOE citation (160-3-20.04)
- Stipends must be supplemental and paid for work beyond regular contract time
- Stipends must be paid consistently across all federal and non-federal programs and include process for payment
- Stipends must align with SBOE content, LEA or school initiatives or PD plans
- Stipends must be paid after implementation of the professional development, not after attending professional development

2 CFR §200.403(c), §200.404(e)

Internal Controls - Time and Effort

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Essential Components of Time and Effort Policies and Procedures:

- Completion of time and attendance reporting;
- Approval cycle that is required
- Processing of personnel charges to federal awards; and
- Internal review process that will be established to ensure effective internal control over the award.

The information should be sufficient detail to permit an understanding of how the system will operate from the point the time [is] worked to the point the time is recorded in the accounting records and charged to the federal award.

Reminder: Charges must be based on records that accurately reflect the work performed, must supported by system of internal controls, and meet the other general requirements in 2 CFR 200.430(i)

Internal Controls Help Prevent Fraud

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Who commits fraud:

- School employees
- School officials
- Grant managers
- Central office staff



How Fraud is Committed:

- Misapplication
- Grant fraud
- Procurement fraud
- Bribery/kickbacks
- Theft/embezzlement

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Fraud Indicators

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- No separation of duties
- Lack of internal controls
- Lack of audits or repeat findings
- Lack of documentation for questioned costs
- High turnover of personnel
- Unexplained entries in accounting records
- Unusually large amounts of cash payments
- Inadequate or missing documentation
- Altered records
- Inventories and financial records not reconciled
- Unauthorized transactions
- Unreasonable costs



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Your Role in Preventing Fraud

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As the Grant Manager:

- Develop and maintain detailed Internal Controls
- Train everyone on your Internal Controls
- Review and question all documentation
- Request adequate information

Watch for:

- Inflated invoices
- Payments to unknown vendors
- Funding for non-existent positions
- Funding for non-existent equipment or services
- Requests for portions of proceeds
- Inappropriate consultant or contract costs

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FY20 Budget Closeout Reminders

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Reminders Closing Out FY20 and Going Into FY21

- The LEA's FY21 identified needs and action steps (not strengths and challenges) in the approved FY21 CLIP will determine the allowable activities that may be budgeted for Title II, Part A
- This is the time of year to be sure that all charges to the grant are allowable, all participants are allowable, and all professional development (PD) aligns with the ESSA PD definition
- Now is the time of year to ensure all source documentation for FY20 expenditures is being collected and filed (*Refer to Title II, Part A Handbook*)

Budget Closeout Reminders – Time and Effort

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Reminders Closing Out FY20 and Going Into FY21

- This is also the time of year to ensure all records for time and effort (annual or periodic certifications, time logs) are being collected and filed (*Refer to Title II, Part A Handbook*)
- Teachers who serve as mentors may complete work during the school day. The submission of a mentor job description with the budget submission should illustrate that the work is above and beyond what is required of the contracted position.

SECTION IV: Title II, Part A Budget Updates

Title II, Part A Budget Updates

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- SBOE approved (02.20.20) Title II, Part A reallocations based on FTE and Poverty counts for new, expanding, or closing charters.
- Updated GANS are available in the attachment tab of each LEA's ConApp.
- Data Collection Forms are currently being reviewed for FY21.

Questions

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