

ESEA: Title V, Part B 2019-2020 Annual Report

Rural Education Achievement Program



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Title V, Part B Program Staff

Georgia Department of Education

Federal Programs Division

Title V, Part B
Rural Education Achievement Program

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Georgia's System of Continuous Improvement



Georgia's System of Continuous Improvement guides the work of the Georgia Department of Education (GaDOE) to ensure that the work of the agency is aligned across all divisions, departments, and programs. The Georgia's Systems of Continuous Improvement framework focuses on the systems and structures (the "what") that must be in place for sustained improvement in student outcomes. It also utilizes a problem-solving model (the "how") to provide a clear process for identifying improvement needs, planning for improvement, and implementing, monitoring, and evaluating the improvement efforts. This framework is designed to provide meaningful support to schools and districts in the school improvement process.

Grant Implementation Overview

In Georgia, the Georgia Department of Education (GaDOE) sets policy, develops guidance and provides training and technical assistance for Georgia LEAs. A Grants Programs Manager and one Education Program Specialist provide technical assistance to all Title V, Part B grantees in the state. Training is coordinated at a state level and delivered through (a) an annual federal programs conference, (b) collaborative federal program sessions and webinars, and (c) Grants Unit only webinars. The GaDOE publishes an annual LEA Title V, Part B Handbook and maintains a public website.

During the 2019-2020 school year, Georgia's governor issued an executive order to close schools on March 16, 2020 due to a global pandemic.

During the 2019-2020 school year, Georgia's governor issued an executive order to close schools on March 16, 2020 due to the global COVID-19 pandemic. LEAs continued to provide instruction to students through distance learning for the remainder of the school year. The GaDOE continued to provide technical assistance for LEAs during the school closures through FAQs, updates, webinars, and

online professional development courses including guidance on COVID-19 responses, CARES Act funding, distance learning strategies and FY21 ESSA funds.

The Federal grant (15-month grant cycle) is cyclical in nature, beginning in July and ending September of the following year. In Georgia, LEAs begin by completing an internal Comprehensive Needs Assessment and consolidated federal grant application called the Consolidated LEA Improvement Plan (CLIP) and Consolidated Application, respectively. The application is maintained in the Georgia Longitudinal Data System (LDS) and is supported by regional Continuous Improvement Teams (CITs). Once approved, LEAs submit a budget based on their formula-based allocation. Then LEAs administer the grant, submitting budget adjustments/amendments, as needed. Although LEAs can carryover 100% of allocated funds, it is expected that LEAs, in the best interests of teachers and students, draw down funds regularly through the year and expend all funds as budgeted. LEAs' work is supported by the Title V, Part B Education Program Specialist; however, LEAs requiring targeted support may be further assisted by Continuous Improvement Teams (CIT) comprised of staff across three GaDOE Divisions (Federal Programs, School and District Effectiveness, and Teaching and Learning).

LEAs are formally monitored for compliance through GaDOE Cross-functional Monitoring (CFM) every four years, and/or depending on annual risk assessment results more frequently. The Title V, Part B Education Program Specialist, along with the Program Manager and other members of the Grants Unit, are cross trained and are scheduled to monitor the Title V, Part B program in their assigned LEAs; a practice which encourages objectivity and fosters a stronger alignment of expectations and technical assistance. Generally, CFM dates may include onsite or desktop; however, in FY20 monitoring dates were adjusted to include only desktop after the governor issued an executive order to close schools due to the global pandemic. Immediately following the school closures, monitoring dates were suspended until the Fall of 2020, however, eight LEAs opted to continue with desk monitoring as scheduled. Of the 58 LEAs on the monitoring cycle for FY20, 24 of them were monitored in spring 2020. LEAs receiving findings as part of the cross-functional monitoring completed corrective actions in order ensure they have internal controls and protocols that ensure compliance with federal law, federal regulations (EDGAR), and federal and state guidance. Based on the GaDOE 4-year cross-functional monitoring cycle, any LEA that does not participate in CFM completes an annual self-monitoring review.

Generally, CFM dates may include onsite or desktop, however, in FY20 monitoring dates were adjusted to include only desktop after the governor issued an executive order to close schools due to the global pandemic. Following the school closures, monitoring dates were suspended until the Fall of 2020, however, 8 LEAs opted to continue with desk monitoring as scheduled.

The Title V, Part B Program Specialist provided timely technical assistance to LEAs as necessary to ensure LEA compliance with State and Federal laws and guidance. In addition to technical assistance sessions, the Program Specialist and Program Manager provided professional learning opportunities via individual LEA trainings, regional trainings, and state conferences.

In Georgia, LEAs are required to have an external audit each year. Any audits from prior fiscal years that require program review are reported by the Georgia Department of Audits to GaDOE and GaDOE program staff resolve these audits. These are resolved directly with the LEAs.

LEAs conclude the federal fiscal year with a completion report, finalized in the Grants Accounting Online Reporting System (GAORS).

RLIS Objectives and Outcomes

Title V, Part B of Every Student Succeeds Act, or ESSA, provides funding to address the unique needs of rural local education agencies (LEAs) that:

1. Lack the personnel and resources needed to compete effectively for Federal competitive grants.
2. Receive formula grant allocations often too small to be effective in meeting their intended purpose.

There are two separate grant programs within Title V, Part B:

- The Small Rural School Achievement Grant Program (SRSA) (Section 5211) is funded directly by the United States Department of Education (ED).
- The Rural and Low-Income School Program (RLIS) (Section 5221) provides federal funds to the Georgia Department of Education (GaDOE) which allocates funds to rural LEAs serving concentrations of poor students.
- Under ESSA, LEAs may be found eligible for both programs and must select either SRSA or RLIS.

The Georgia Department of Education's (GaDOE) strategic plan outlines nine strategic goals to ensure that each Georgia student is afforded a high quality and holistic public education. The Rural and Low-Income Schools Program (RLIS) aligns with and supports strategic goals 1, 2, 3, 6 and 7 as described in Georgia's Strategic Plan, and as listed below, to support the academic goals of both the state as a whole and LEAs. LEAs develop their individual goals based upon needs identified through Georgia's Systems of Continuous Improvement framework. LEAs' progress is determined based on their schools meeting established performance indicators, which are assessed annually through state-administered assessments and local performance assessments.

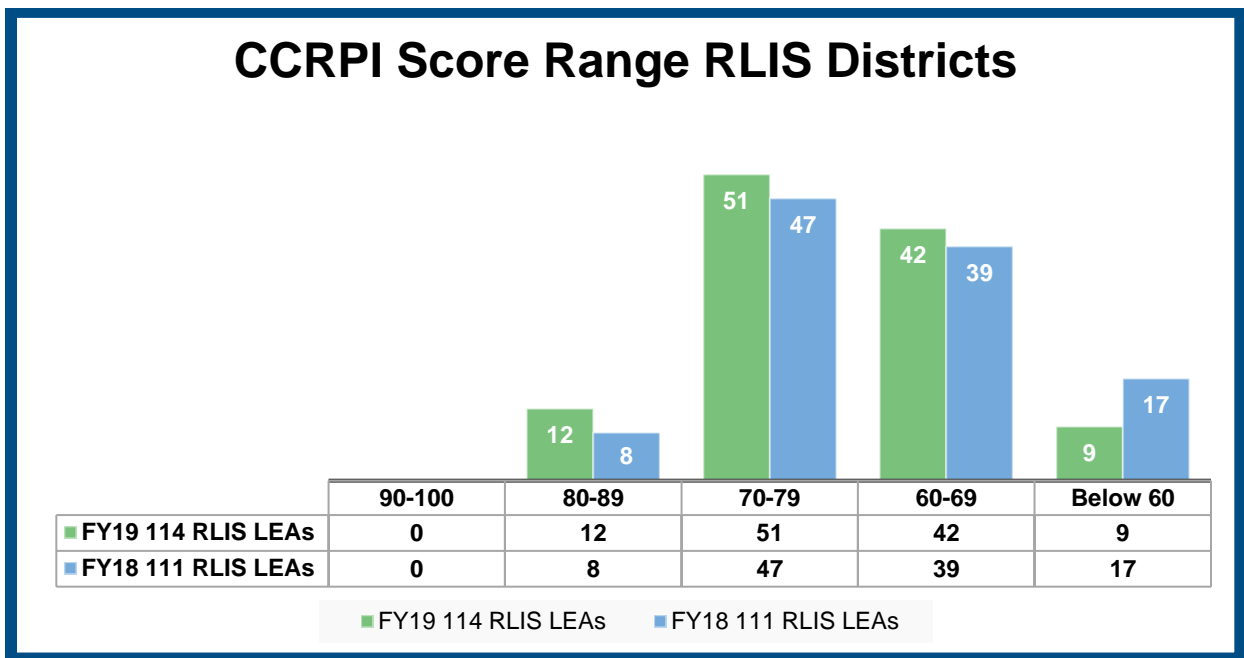
The strategic goals that align with the RLIS program are:

- Revise/develop and implement viable academic standards that engage learners with essential knowledge, skills, and enduring concepts;
- Increase the percentage of K-5 students with a strong knowledge of foundational skills and concepts;
- Increase the percentage of high school graduates who are college and / or career ready;
- Increase LEA, leader, and teacher effectiveness through high-quality service and support; and
- Increase the number of schools with a safe, healthy, and positive learning climate.

RLIS LEA CCRPI Score Distribution

The College and Career Ready Performance Index – CCRPI – is Georgia’s annual tool for measuring how well its schools, districts, and the state itself are preparing students for the next educational level. It provides a comprehensive roadmap to help educators, parents, and community members promote and improve college and career readiness for all students.

The CCRPI includes five main components each scored on a scale of 0 to 100: Achievement, Progress, Closing Gaps, Readiness, and Graduation Rate (high school only). These components, encompassing multiple indicators, are combined for a total CCRPI score on a scale of 0 to 100.



Sources: CCRPI District Score Report (FY18, 111 RLIS LEAs); CCRPI District Score Report (FY19, 114 RLIS LEAs)

The state average CCRPI score in FY19 was 75.9 and the average for the 114 RLIS districts was 71.04. In FY18, the state average score was 76.6 and was 69.15 for the 111 RLIS districts. Overall, RLIS LEAs are showing improvement with more school districts moving up in the CCRPI score range.

On March 27, 2020, ED approved Georgia's request to waive statewide assessment, accountability, and reporting requirements in the Elementary and Secondary Education Act (ESEA) for the 2019-2020 school year due to widespread school closures related to the novel Coronavirus disease (COVID-19). Therefore, there are no 2020 CCRPI reports.

2019-2020 State Education Agency (SEA) Allocation

SEA allocations are determined using a formula outlined in ESSA. The state formula is based on the number of students in average daily attendance served by the eligible local educational agency (LEA). GaDOE sets aside 5% of the amount of the grant for State administrative costs.

FY20 Allocation Information LEAs eligible for the Rural and Low-Income School Program	
FY20 Total Title V, Part B allocation to GADOE from USED	\$6,361,913
FY20 Title V, Part B Administration set aside - 5%	(\$318,095)
Total Title V, Part B Allocation to Districts	\$6,043,818
Per Pupil Average based on ADA Recount- RLIS eligible only LEAs	\$20.30
Number of LEAs receiving RLIS funds	108

Title V, Part B provides funds for rural and low-income districts to be used for supplemental activities authorized under the following federal formula grants:

Title I, Part A (Improving Basic Programs Operated by LEAs)
Title II, Part A (Improving Teacher Quality)
Title III (Language Instruction for English Learners and Immigrant Students)
Title IV, Part A (Student Support and Academic Enrichment Grants)
Parent Involvement Activities

2019-2020 Rural and Low-Income Schools Program LEA Eligibility

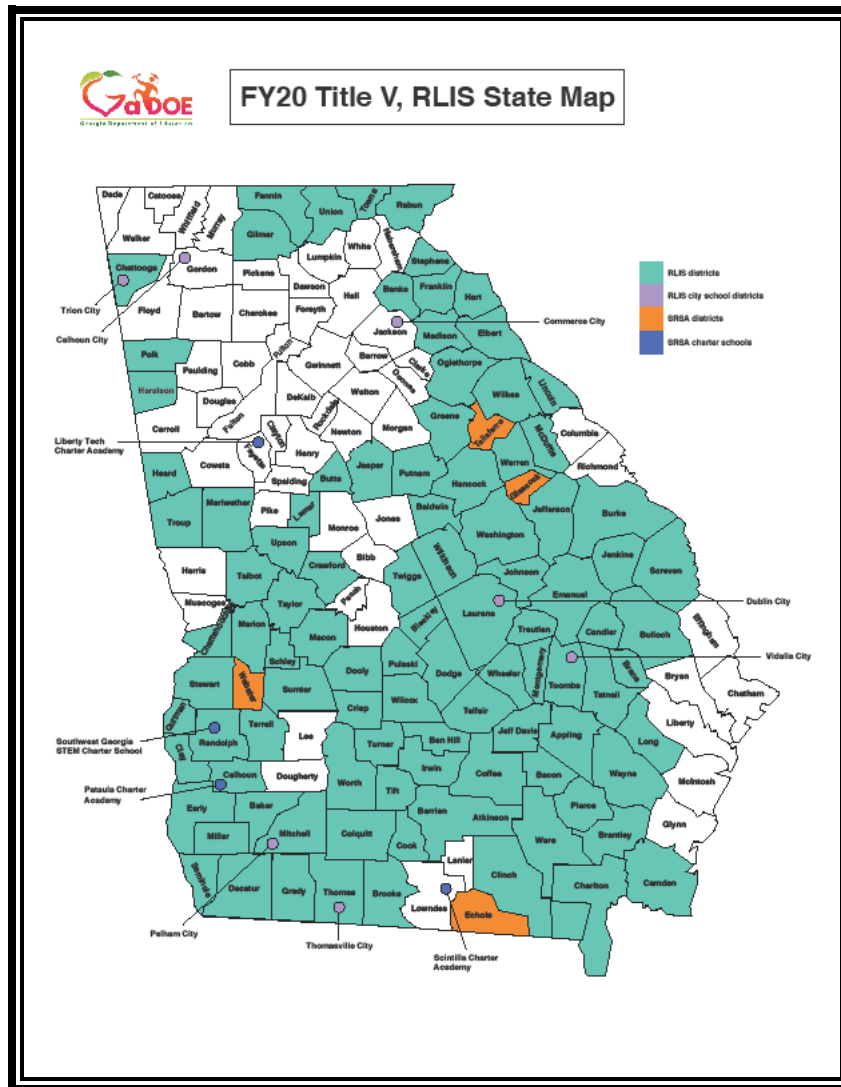
Title V, Part B awards grants to eligible local educational agencies based on formula. A local educational agency is eligible to receive a grant if:

1. 20 percent or more of the children ages 5 through 17 served by the local educational agency are from families with incomes below the poverty line based on data provided by the United States Census Bureau and United States Department of Education (USDE).; and
2. All the schools served by the agency are designated with a local code of 32,33, 41, 42, or 43, as determined by the National Center for Education Statistics based on the geographic location of each individual school in the LEA.

Rural Education Initiative Eligibility	
Districts Receiving RLIS allocation	108
Dual Eligible Districts (SRSA and RLIS)	10
SRSA Eligible Only	4

- 110 districts were eligible for RLIS in FY20
 - 10 were Dual eligible for SRSA and RLIS and had to choose one program
 - 2 of the 110 chose SRSA (Echols and Glascock)
 - 108 districts received FY20 RLIS allocations

- 4 eligible for SRSA only and must apply to USED:
 - Commission Charter Schools- Liberty Tech Charter Academy
 - Commission Charter Schools- Pataula Charter Academy
 - Commission Charter Schools- Southwest Georgia S.T.E.M. Chart
 - State Charter Schools- Scintilla Charter Academy



2019-2020 LEA Allocations

Allocations are received from ED in early summer, after which allocations to LEAs are determined by GaDOE and approved by the State Board of Education. Eligible LEAs may obligate Title V, Part B funds during the federal fiscal year for which the funds were appropriated and during the succeeding federal fiscal year. The funding period gives the eligible LEAs 27 months to obligate their funds. It is the expectation of ED and the GaDOE that Title V, Part A, RLIS funding be expended during the year in which it is allocated. There are no carryover limitations placed on Title V, Part B funds.

LEA		Eligible ADA	FY20 Title V Allocation
1	Appling County	3,410	69,232
2	Atkinson County	1,602	32,525
3	Bacon County	2,040	41,417
4	Baker County	267	5,421
5	Baldwin County	4,934	100,173
6	Banks County	2,776	56,360
7	Ben Hill County	3,006	61,030
8	Berrien County	3,020	61,314
9	Bleckley County	2,389	48,503
10	Brantley County	3,232	65,618
11	Brooks County	2,030	41,214
12	Bulloch County	10,115	205,361
13	Burke County	3,932	79,830
14	Butts County	3,320	67,405
15	Calhoun County	579	11,755
16	Camden County	8,986	182,440
17	Candler County	2,051	41,641
18	Charlton County	1,632	33,134
19	Chattahoochee County	822	16,689
20	Chattooga County	2,703	54,878
21	Clay County	211	4,284
22	Clinch County	1,311	26,617
23	Coffee County	7,265	147,499
24	Colquitt County	9,078	184,308
25	Cook County	3,041	61,740
26	Crawford County	1,621	32,911
27	Crisp County	3,822	77,597
28	Decatur County	4,899	99,463
29	Dodge County	3,034	61,598
30	Dooly County	1,190	24,160
31	Early County	1,970	39,996
32	Elbert County	2,884	58,553
33	Emanuel County	4,082	82,875
34	Evans County	1,794	36,423
35	Fannin County	2,931	59,507
36	Franklin County	3,659	74,287
37	Gilmer County	3,989	80,987
38	Grady County	4,430	89,941

	LEA	Eligible ADA	FY20 Title V Allocation
39	Greene County	2,366	48,036
40	Hancock County	818	16,608
41	Haralson County	3,261	66,207
42	Hart County	3,442	69,882
43	Heard County	1,993	40,463
44	Irwin County	1,641	33,317
45	Jasper County	2,284	46,371
46	Jeff Davis County	2,949	59,873
47	Jefferson County	2,487	50,493
48	Jenkins County	1,081	21,947
49	Johnson County	1,119	22,719
50	Lamar County	2,559	51,955
51	Laurens County	6,158	125,024
52	Lincoln County	1,080	21,927
53	Long County	3,523	71,526
54	Macon County	1,297	26,333
55	Madison County	4,776	96,966
56	Marion County	1,343	27,266
57	McDuffie County	3,828	77,719
58	Meriwether County	2,584	52,462
59	Miller County	940	19,085
60	Mitchell County	2,178	44,219
61	Montgomery County	867	17,602
62	Oglethorpe County	2,096	42,554
63	Pierce County	3,511	71,283
64	Polk County	7,503	152,331
65	Pulaski County	1,250	25,378
66	Putnam County	2,818	57,213
67	Quitman County	312	6,334
68	Rabun County	2,159	43,833
69	Randolph County	799	16,222
70	Schley County	1,257	25,520
71	Screven County	2,240	45,478
72	Seminole County	1,433	29,094
73	Stephens County	3,861	78,389
74	Stewart County	446	9,055
75	Sumter County	4,337	88,053
76	Talbot County	458	9,299

	LEA	Eligible ADA	FY20 Title V Allocation
77	Taliaferro County	163	3,309
78	Tattnall County	3,658	74,267
79	Taylor County	1,345	27,307
80	Telfair County	1,645	33,398
81	Terrell County	1,286	26,109
82	Thomas County	5,486	111,380
83	Tift County	7,514	152,554
84	Toombs County	2,779	56,421
85	Towns County	987	20,039
86	Treutlen County	1,063	21,582
87	Troup County	11,730	238,149
88	Turner County	1,147	23,287
89	Twiggs County	767	15,572
90	Union County	2,766	56,157
91	Thomaston-Upson County	4,006	81,332
92	Ware County	5,788	117,512
93	Warren County	584	11,857
94	Washington County	3,025	61,416
95	Wayne County	5,115	103,848
96	Webster County	328	6,659
97	Wheeler County	954	19,369
98	Wilcox County	1,116	22,658
99	Wilkes County	1,470	29,845
100	Wilkinson County	1,310	26,596
101	Worth County	3,088	62,695
102	Calhoun City	3,858	78,328
103	Commerce City	1,575	31,977
104	Dublin City	2,219	45,052
105	Pelham City	1,399	28,403
106	Thomasville City	2,692	54,655
107	Trion City	1,322	26,840
108	Vidalia City	2,390	48,523
	Totals	297,686	6,043,818

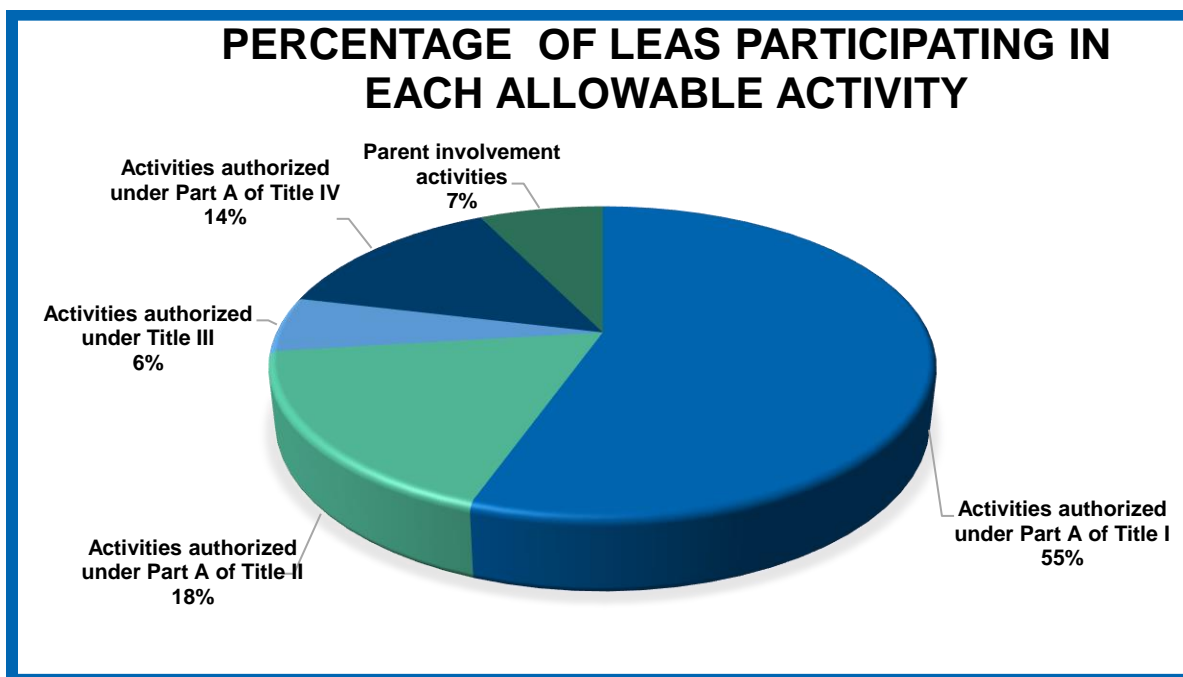
Maintenance of Effort

ESSA addresses the LEA's responsibility to maintain local funding. If a LEA fails to maintain fiscal effort, the State Education Agency may be required to reduce the current year allocation. When notified by the GaDOE Finance Division that an LEA has failed to maintain effort, GaDOE Title I, Part A program staff completes the necessary waiver on behalf of the LEA. One LEA did not initially meet MOE for FY20 school year; however, the LEA has not failed to meet MOE over the last five years; therefore, it is in compliance with ESSA requirements.

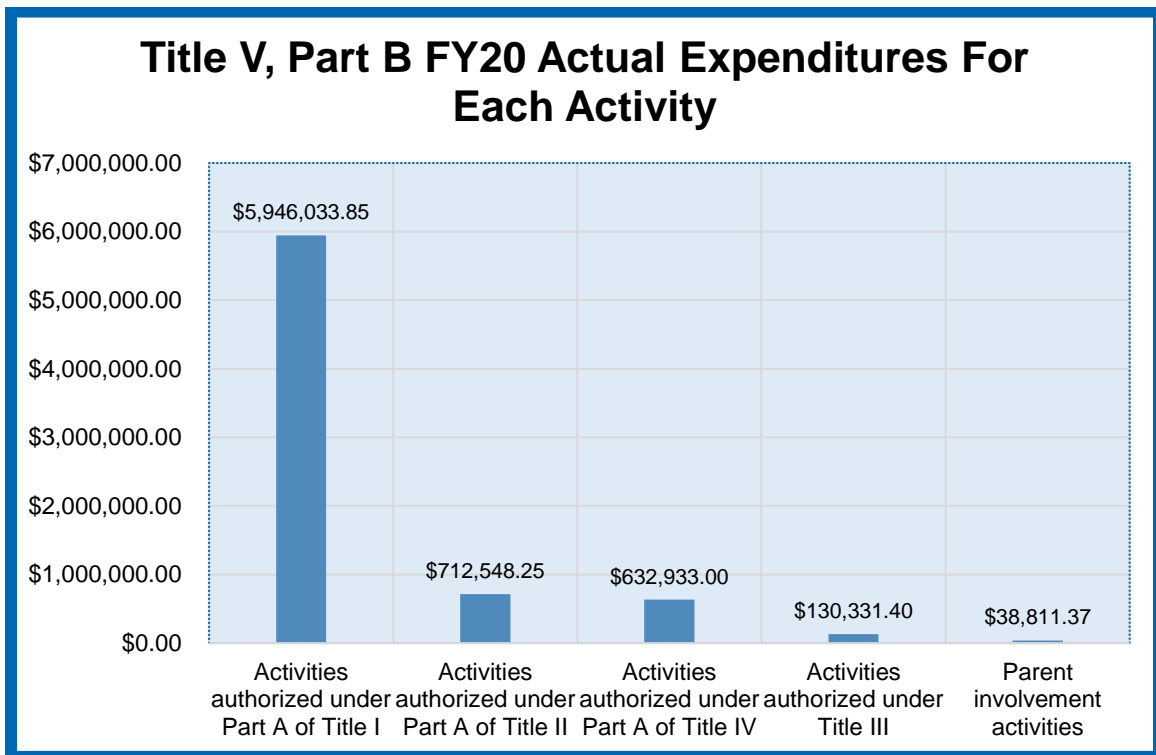
2019-2020 Title V, Part B Expenditures

Source: FY20 Annual Evaluation Report submitted by LEAs

Each LEA receiving Title V, Part B funds may choose to expend funds for any of the authorized activities under the allowed federal formula programs authorized under ESSA. Funds must supplement activities implemented in the district based on identified needs. At the end of each fiscal year, after submitting the Program Completion Report to Grants Accounting, districts must submit an Annual Evaluation Report indicating the activities for which the district expended funds, and the amount of funds expended for each activity or program. The following pie chart reports the percentage of RLIS districts participating in each of the allowed federal formula programs in FY20. It should be noted that many activities overlap across the federal programs for which Title V, Part B funds may be expended. For example, professional learning is an allowable for more than one of the programs or activities, so an LEA may report this activity under Title I or Title II. The decision of where to report each activity is the decision of the district.



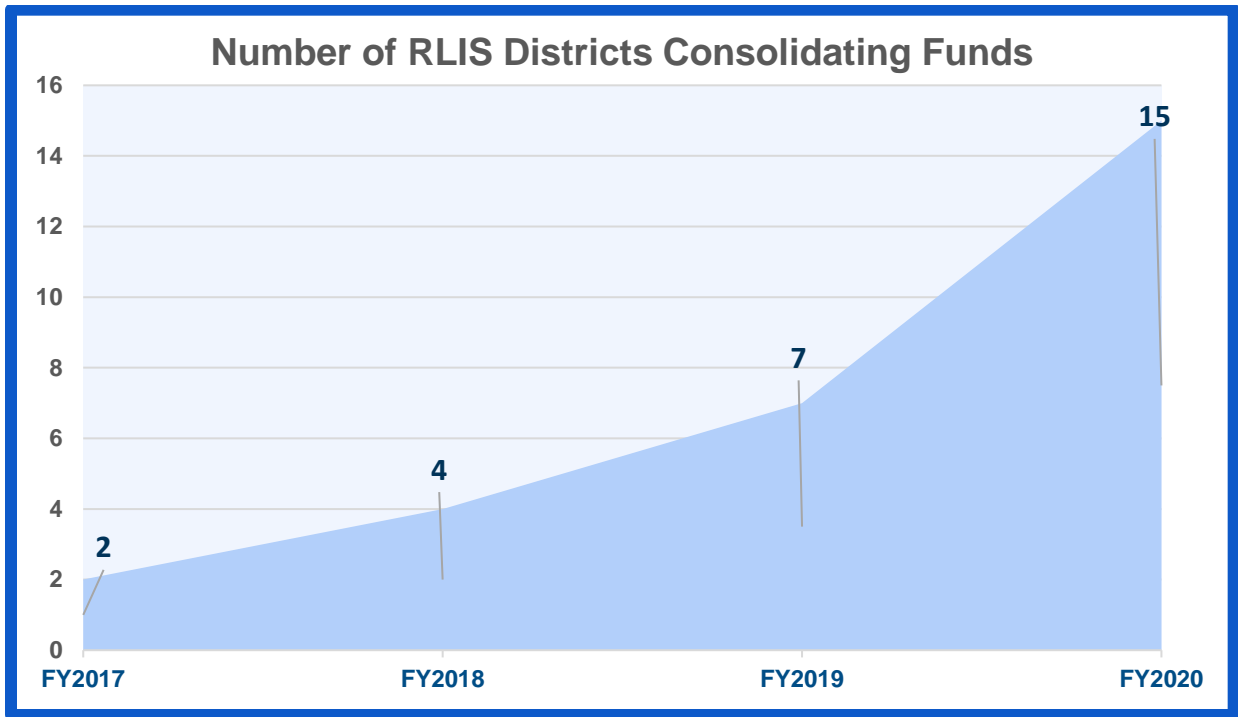
Each LEA reports the actual amount of funds expended for each authorized activity during the fiscal year. During budget development, the LEA reports the amount of anticipated expenditures for each activity, and after the fiscal year has ended the LEA reports the actual expenditures for each activity. The actual expenditures must align with the Program Completion Report submitted to Grants Accounting on October 30 of each fiscal year. The expenditures reported include the current year allocation plus any carryover funds from the previous year, and any funds transferred into Title V, Part B from either Title IV, Part A or Title II, Part A or a combination thereof. The chart below reports the amount of funds expended under Title V, Part B for each of the five authorized activities.



Title V, Part B Consolidation of Funds

Under ESSA, LEAs are granted some flexibility in determining how they can best meet the needs of their LEA. This includes the ability to coordinate funds through a traditional budget, consolidate federal funds, consolidate federal and state funds or transfer funds into Title V, Part B.

Consolidation: Title I schools running a schoolwide program may choose to consolidate funds. By consolidating eligible federal funds in a schoolwide program, a school can more effectively design and implement a comprehensive plan to upgrade the entire educational program in the school as identified through a comprehensive needs assessment.



The chart above indicates how interest grows each year in Consolidation of Funds. Most of the RLIS districts who participated in consolidation chose to include Title V, Part B funds in the consolidation budget; however, some did not consolidate these funds and budgeted them outside of consolidation to fund district initiatives. Consolidating funds offers greater flexibility in meeting the academic needs of students.

Title V, Part B Transferability 2019-2020

ESEA allows LEAs the flexibility to target eligible Federal funds to the programs and activities that most effectively address the unique needs of LEAs. The LEA may transfer all or any lesser amount of their Title II, Part A or Title IV, Part A allocations into Title V, Part B. Title V, Part B funds may not be transferred out and into another federal program. When funds are transferred into Title V, Part B, the funds become Title V, Part B funds and must adhere to the provisions in ESSA for the implementation of the Title V, Part B program activities and expenditure of funds. Title V, Part B allocations may be spent for activities authorized under certain federal formula programs as previously stated in this report, including Title II, Part A and Title IV, Part A.

Number of RLIS Districts Participating in Transferability	Title II, Part A Funds Transferred Into Title V, Part B	Title IV, Part A Funds Transferred Into Title V, Part B	Total Funds Transferred Into Title V, Part B
4	\$403,833	\$283,165	\$422,355

Supplement Not Supplant

Title V, Part B funds must supplement and not supplant all local, state, and other federal funds. In general, when considering whether a proposed RLIS activity is supplemental, an LEA should determine whether it would have funded this activity with other federal, state, or local funds if no REAP funds were available. If the result of this determination is that no other federal, state, or local funds are available to fund the proposed activity, then the LEA may be able to use REAP funds for those activities, provided they are an allowable use of RLIS funds.

There are three situations when it will be presumed that supplanting has occurred:

- if the activity is one that would ordinarily be covered with other federal, state, or local funds (for example, in most cases, standard textbook purchases would ordinarily be covered with state or local funds),
- if the LEA previously funded the activity with other federal, state, or local funds, or
- if the activity is state-mandated or required by federal law (e.g., provision of certain services to English learners required by federal civil rights laws).

The burden of proof lies with the LEA in ensuring that no Title V, Part b expenditures are supplanting local, state, or other federal funds.

Monitoring of Title V Part B

As the state pass through entity, GaDOE is responsible for overseeing the successful implementation of Title V, Part B in LEAs who receive an allocation and implement activities using RLIS funds. According to the Uniform Grants Guidance (2 CFR 200.328), monitoring by the non-federal entity must cover each program, function, or activity.

LEAs are monitored on a four-year cycle. Approximately one-fourth of the LEAs are monitored each year. As part of the annual review process in determining which LEAs are to be monitored, the Division of Federal Programs conducts a risk assessment using a combination of elements defined by GaDOE. An LEA's risk assessment rating is determined by using both its risk rating, based on a set of established High-Risk Elements developed by the Division of Federal Programs and a risk rating from GaDOE's Financial Review Division.

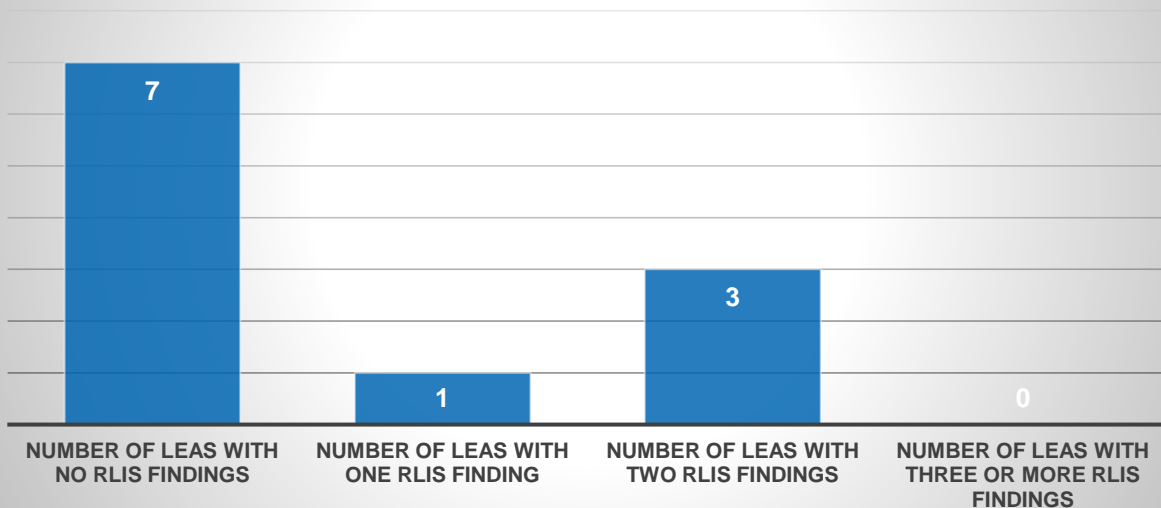
During the summer of each year, the Division of Federal Programs completes a risk assessment to determine if an LEA falls into the high-risk category. The results of the risk assessment determine which LEAs may be added to the regular CFM cycle for that year. The SEA has the responsibility to monitor high-risk LEAs (§ 200.331(b)(1-4)). The Division of Federal Programs defines high-risk as:

- LEAs showing evidence of serious or chronic compliance problems
- LEAs with financial monitoring/audit findings; and/or LEAs with a high number of complaints from parents and other stakeholders about program implementation.
- Other elements that may cause an LEA to be determined high-risk include size of allocation and new federal programs for fiscal management personnel in the LEA.
- High-risk does not necessarily mean an LEA is not meeting the requirements of the program, federal regulations, or administrative procedures. It does mean that an LEA may be at a higher risk of having program elements that could cause it to not meet requirements associated with federal rules, regulations, and administrative procedures.

2019-2020 Title V, Part B Monitoring Findings

GaDOE monitors on a 4-year cycle and adds LEAs who are High Risk according to the annual risk assessment. Due to a global pandemic, the FY20 monitoring cycle was interrupted because the Georgia Governor issued an executive order to close schools in March 2020. The most common areas for findings are in expenditures. GaDOE staff commonly find errors in internal controls and lack of supporting documentation that illustrate compliance with statute and applicable regulations.

FY20 Number of Findings for RLIS Monitored Districts



Monitoring Analysis

Title V, Part B monitors districts for the following indicators:

1. LEA Monitoring of Programs
2. Consolidated LEA Improvement Plan (CLIP) and Schoolwide, Targeted Assistance Plans
3. Internal Controls, Expenditures, Inventory, Cost Principles, Drawdowns
4. Title V, Part B, Rural and Low-Income Schools Programs

Most findings centered around internal controls as evidenced by a lack of completeness and clarity in the written procedures in the LEA. Written procedures are essential to operating federal programs and to maintain compliance with federal law and regulations. The districts all completed a Corrective Action Plan in response to the specific findings to revise and strengthen these procedures and the documentation maintained at the district as evidence of compliance with the law.