DISCLAIMER
This handbook is provided as a resource for Georgia Local Education Agencies administering the Title II, Part A Improving Teacher Quality State Grants. It is intended to provide coordinators with uniform practices to govern professional activities and implementation of this Federal program. This handbook is not intended to replace the legislation or USDE Non-Regulatory Guidance. Therefore, it is highly recommended that coordinators consult the appropriate resources available online for complete guidance and regulations. In addition, all LEAs and coordinators responsible for implementing this Federal program must abide by current laws, regulations, and administrative procedures, U. S. Department of Education (USDE) guidance, and the Education Department General Administrative Regulations (EDGAR). This handbook is considered a working draft and is reviewed and updated as policies and procedures change and, at a minimum, is reviewed yearly. For more information, contact a Title II, Part A Education Program Specialist.

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Current Edition Published by
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Original Title II, Part A LEA Handbook published February 2004 by the Georgia Professional Standards Commission
Revised June 2016
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Section 1
Program Administration Overview and Resources

The following section contains an overview of ESEA/NCLB and Title II, Part A. It further details eligibility, the determination of allocations, the period of performance, carryover and program assurances. It also includes a timeline for Title II, Part A program implementation.
PREVIEW OF SECTION 1

Overview
1.1 Federal Award Identification Information
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1.1 Federal Award Identification Information
Grant identifying information can be found on the SEA and LEA Grant Award Notification, also known as the GAN. It includes:
• Catalog of Federal Domestic Assistance (CFDA): Title II, Part A (84.367A)
• FY17 Federal Award Identification Number (FAIN) - S367A160001

1.2 Overview of Title II, Part A
Title II, Part A Improving Educator Quality State Grants 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 ESEA/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. Further guidance has been provided by USDE in the form of Dear Colleague Letters and FAQs. In 2012 USDE allowed SEAs to submit Flexibility Waivers, per these FAQs all flexibility requests are null and void as of August 1, 2016.
Improving Teacher Quality State Grant funds are obtained by a State on the basis of the United States Department of Education’s (USDE) approval of either (1) an individual State plan as provided in ESEA/NCLB Sec. 2112 (20 USC §2112) or (2) a consolidated application that includes the program, in accordance with ESEA/NCLB Sec. 9302 (20 USC §7842). Through the program, state and local educational agencies (SEAs and LEAs) receive funds using a USDE provided formula based on poverty and population. This formula will be adjusted annually from July 2017 – July 2021.

The purpose of the Title II, Part A grant is

- to increase student achievement consistent with challenging State academic standards,
- to improve the quality and effectiveness of teachers and principals,
- to increase the number of teachers and principals who are effective in improving student academic achievement in schools, and
- to provide low-income and minority students greater access to effective teachers and principals.

Reporting requirements ask SEAs, and thereby LEAs, to report their progress in meeting the purpose of Title II, in improving equity for low-income and minority students, and reporting on teacher and leader effectiveness and retention.

The GaDOE is the state educational agency recognized by the USDE as the granting agency for funds. The GaDOE oversees the administrative responsibilities of the State and its sub-grantees. It is responsible for determining the Title II, Part A LEA grant allocations. The GaDOE supervises the administration of innovative projects, develops guidance on effective strategies for improving Teacher and Leader Effectiveness, interprets Federal law, develops a formal statement of state priorities based on a needs assessment, provides technical assistance and formal training, monitors fiscal control of grant awards, disseminates information about successful programs and practices, guides fund accounting procedures, oversees monitoring and reporting of program performance, ensures compliance with Federal regulations, and assures instructional delivery is being utilized with at-risk populations. This handbook only addresses Title II, Part A.

1.3 LEA Eligibility

O.C.G.A. §160-5-1-.36

A Local Educational Agency (LEA) is a local school system pursuant to local board of education control and management. In Georgia, this applies to traditional school LEAs, state and commission approved charter schools, and, by Georgia special statutes, the Department of Juvenile Justice (O.C.G.A. §49-4A-12) and the Department of Corrections (O.C.G.A. §42-2-5.1). LEA eligibility outside the aforementioned entities is handled on case-by-case basis by the GaDOE Title II, Part A Program Staff, the GaDOE Legal Counsel and Guidance from USDE.

1.4 Determining Allocations For LEAS

Title II, Part A Non-Regulatory Guidance

During the summer, the GaDOE receives notification of its current fiscal year SEA allocation. The allocation for LEAs is based on a federal formula grant that calculates a hold harmless amount which consists of an Eisenhower Math and Science allocation and Class Size Reduction allocation. The Eisenhower Math and Science allocation is based on Title I, Part A allocations and total population count. The Class Size Reduction allocation is based on both poverty and total population
counts. The remaining total above and beyond the hold harmless amount is allocated by poverty count (80%) and total population count (20%). Adjustments to accommodate the opening and closing of LEAs is guided by the USDE, *Title II, Part A Non-Regulatory Guidance* published in 2006. Poverty and 5-17 population data are provided by USDE. In any year in which there are insufficient funds to provide the LEAs with their hold harmless amount, the SEA will ratably reduce each LEA allocation. ESEA/ESSA outlines changes in the SEA and LEA allocation formulas over five years beginning in the 2017-2018 school year.

<table>
<thead>
<tr>
<th></th>
<th>SEA % of 2001 Hold Harmless</th>
<th>SEA Population</th>
<th>SEA Poverty</th>
<th>LEA Population</th>
<th>LEA Poverty</th>
</tr>
</thead>
<tbody>
<tr>
<td>2016-2017</td>
<td>No Change 100%</td>
<td>No Change</td>
<td>No Change</td>
<td>No Change 20%</td>
<td>No Change 80%</td>
</tr>
<tr>
<td>2017-2018</td>
<td>85.71%</td>
<td>35%</td>
<td>65%</td>
<td>20%</td>
<td>80%</td>
</tr>
<tr>
<td>2018-2019</td>
<td>71.42%</td>
<td>30%</td>
<td>70%</td>
<td>20%</td>
<td>80%</td>
</tr>
<tr>
<td>2019-2020</td>
<td>57.13%</td>
<td>25%</td>
<td>75%</td>
<td>20%</td>
<td>80%</td>
</tr>
<tr>
<td>2020-2021</td>
<td>42.84%</td>
<td>20%</td>
<td>80%</td>
<td>20%</td>
<td>80%</td>
</tr>
<tr>
<td>2021-2022</td>
<td>28.55%</td>
<td>20%</td>
<td>80%</td>
<td>20%</td>
<td>80%</td>
</tr>
<tr>
<td>2022-2023</td>
<td>14.26%</td>
<td>20%</td>
<td>80%</td>
<td>20%</td>
<td>80%</td>
</tr>
<tr>
<td>2023-2024</td>
<td>0%</td>
<td>20%</td>
<td>80%</td>
<td>20%</td>
<td>80%</td>
</tr>
</tbody>
</table>

For FY17: The SEA reserves 1% of total funds for Title II, Part A administration. Of the remaining amount, 5% is used for SAHE and State Activities and 95% is allocated to LEAs. These three allocations are pre-determined by USDE.

1.5 Maintenance of Effort

*ESEA/NCLB Sec. 9521*

Elementary and Secondary Education Act of 1965 addresses the LEA’s responsibility to maintain local funding at the level of at least 90% of the preceding fiscal year. If a LEA fails to maintain fiscal effort, the State Education Agency may be required to reduce the current year allocation. Calculations to determine MOE are done at the State Level. Title I, Part A program staff (on behalf of all Federal programs) works collaboratively with districts who did not maintain fiscal effort to apply for a waiver from USDE.

1.6 Funding Availability: Period of Performance

*2 CFR §200.77; 20 USC §1225*

Funds remain available for obligation, whether they are available to the State, the LEAs, or the SAHE, for a period of 27 months after July 1. This 27-month period includes an initial 15-month period of performance and an automatic 12-month extension permitted under the “Tydings Amendment” (explained in 1.7). As an example, funds appropriated for FY17 first become available to the states on July 1, 2016, and remain available for obligation through September 30, 2018.

In Georgia, allocations to LEAs are approved by the State Board of Education. Regardless of when LEAs are notified of their grant allocation, grantees may begin to obligate funds beginning as early as July 1 of the Federal fiscal year.
When the period of performance for obligation ends, grantees may not incur any further obligation. In Georgia, LEAs are given 30 days to liquidate (October 31) in order to allow the GaDOE to complete the reporting necessary for the Federal government. Period of performance is programmed into the Consolidated Application and is regulated for Federal programs by Grants Accounting.

Detailed information for how period of performance impacts expenditures can be found in Section 4: Fiscal Management.

**1.7 Carryover and the Tydings Amendment**

2 CFR §76.709-710; 20 USC §1225

Congress adopted the Tydings Amendment as incorporated in the General Education Provisions Act. The amendment provides education agencies additional time to spend the Federal funds they receive. Based on the Tydings Amendment, the Education Department General Administrative Regulations (EDGAR) allows grantees to carryover for one additional year any Federal education funds that were not obligated in the period for which they were appropriated. For grants that are forward-funded, grantees can have up to 27 months to obligate appropriated funds beginning as early as July 1 of the Federal fiscal year.

LEAs may carryover 100% of any remaining funds. New LEAs are not eligible for carryover from the previous fiscal year. After completion reports for initial grant cycle are finalized and the LEA has an approved original budget, carryover money is placed by GaDOE Grants Accounting into the portal. A budget amendment combining the carryover funds with the current fiscal year allocation must be submitted to the GaDOE through the consolidated application by January 31. Carryover funds must be used in accordance with the Federal statute and corresponding regulations. LEAs are encouraged to expend the funds in the year in which they are allocated. Failure to spend at least 85% of allocation will result in increased risk.

**1.8 Completion Report**

SBOE 160-5-2-.21; O.C.G.A. §§20-2-164; 20-2-167; 20-2-167.1; 20-2-272

The GaDOE requires each local educational agency (LEA) receiving grant funds to submit a Completion Report no later than 30 days after the grant period ends. For Title II, Part A this would mean Completion Reports are due October 31. Completion Reports may be accessed on-line through Grants Accounting Online Reporting System (GAORS).

A Completion Report defines the total amount of the original grant award and the total amount of funds that were expended by an LEA. Grants Accounting uses completion reports to determine the amount of unexpended funds and the amount of funds available for carryover for each LEA.

Title II, Part A Coordinators should work with their finance department to ensure that completion reports are submitted in a timely manner. GaDOE reserves the right to release new grant funding to individual LEAs only when Completion Reports have been submitted.

**1.9 Risk Assessment Overview**

2 CFR §200.331(b-h)

A risk assessment is a systematic process of evaluating the potential risks that may be involved in a projected activity or undertaking. The annual Title II, Part A risk assessment process (including the risk assessment instrument, risk elements, strategies, consequences, etc.), is required by Federal law and conducted by the GaDOE Title II, Part A program staff and GaDOE Finance and Business...
Office. LEAs are assigned points based on fiscal and program implementation risk elements. LEAs receive a rating of Low, Medium, or High Risk. The results of the assessment rating may impact technical assistance and monitoring.

Risk assessment elements fall into the following general categories:

- **LEA Personnel Experience**
  - Program Coordinator, Superintendent, Finance Director
- **Allocation Size**
- **Program Implementation**
  - Fiscal: Drawdown, Audit Findings
  - Program: Monitoring Findings, Expenditure Findings Exceeding 25%, Repeat Findings, Deadline Adherence, FY16 HiQ Percent

<table>
<thead>
<tr>
<th>1.10 High Risk Rating v. High Risk Designation</th>
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<tr>
<td>2 CFR §200.207; §3474.10 (Original Reference: 34 CFR §80.12)</td>
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</table>

**High Risk Rating:** A LEA that accumulates a high number of points based on a combination of risk elements that show
- the potential for fiscal and/ or programmatic noncompliance, OR
- actual evidence of fiscal and/ or programmatic noncompliance, OR
- a combination of the potential and actual fiscal and/ or programmatic noncompliance.

**High Risk Designation:** A LEA that shows evidence of serious or chronic fiscal and/ or programmatic compliance problems. This may also include a high number of complaints from parents and/ or other stakeholders about fiscal or programmatic implementation, not already calculated in the risk assessment. LEAs who receive this designation may be required to submit invoices for approval prior to the drawdown of funds.

<table>
<thead>
<tr>
<th>1.11 Risk Intervention Strategies</th>
</tr>
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<tbody>
<tr>
<td>2 CFR §200.331(e)</td>
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</tbody>
</table>

Once a LEA’s risk is assessed, Title II, Part A Education Program Specialists will monitor the LEA based on the risk intervention strategies listed below:

<table>
<thead>
<tr>
<th>LEAs designated high risk may be subject to:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Annual Monitoring</td>
</tr>
<tr>
<td>- Cross Functional or Program Onsite/ Desk Monitoring</td>
</tr>
<tr>
<td>- Self-Assessment</td>
</tr>
<tr>
<td>• Written Reporting</td>
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<tr>
<td>- Program Implementation</td>
</tr>
<tr>
<td>- Corrective Action</td>
</tr>
<tr>
<td>• Increased Technical Assistance</td>
</tr>
<tr>
<td>- Onsite or Virtual Technical Assistance</td>
</tr>
<tr>
<td>- Required Attendance at Trainings</td>
</tr>
<tr>
<td>- Invoice Review Prior to Drawdown of Funds (High Risk Desiginees)</td>
</tr>
</tbody>
</table>
### MEDIUM
LEAs designated *medium risk* may be subject to:
- Monitoring
  - As Designated by Cross Functional Monitoring Cycle
  - Interim Program Onsite or Desk Monitoring
  - Annual Self-Assessment
- Written Reporting
  - Program Implementation
- Increased Technical Assistance
  - Onsite or Virtual Technical Assistance
  - Required Attendance at Trainings

### LOW
LEAs designated *low risk* may be subject to:
- Monitoring
  - As Designated by Cross Functional Monitoring Cycle
  - Annual Self-Assessment

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### 1.12 How GaDOE Monitors LEA Implementation of Title II, Part A

In keeping with the provisions of ESEA/NCLB, the GaDOE provides monitoring and technical assistance service to Georgia’s Local Education Agencies (LEAs) for Title II, Part A. It monitors the Title II, Part A program in local education agencies (LEAs) for implementation of program requirements and expenditure of Federal Title II, Part A funds.

1. **LEA Equity Action Plan** (ESEA/ESSA Sec. 2103(b)(3)(B), USDE Transitioning to ESSA FAQs C-8, C-8A (May 4, 2016))
   ESEA/ESSA requires all students have equitable access to academic instruction by effective educators. In Georgia, in compliance with the State Equity Plan, LEAs are required annually to complete a needs assessment and use this assessment to identify prioritized needs, equity gaps, corresponding equity interventions and a plan for addressing the identified equity gaps. The plan is submitted as an attachment to the Consolidated Application at the time of CLIP submission.

2. **Consolidated LEA Improvement Plan (CLIP)** (ESEA/NCLB Sec. 9302)
   ESEA/NCLB requires LEAs to complete an annual needs assessment for the local Title II, Part A program. The results of the needs assessment are reported in the annual Consolidated Application. Title II, Part A Specialists review the Consolidated Application to ensure that needs assessment and planning requirements have been met.

3. **Title II, Part A Effectiveness Plan** (ESEA/NCLB Sec. 2101(2))
   ESEA/NCLB requires LEAs to monitor the effectiveness of the Title II, Part A program. In Georgia, this is done through the Title II, Part A Effectiveness Plan. Title II, Part A Specialists review the LEA Title II, Part A Effectiveness Plan to ensure Title II, Part A funded strategies and activities are planned to address prioritized needs and corresponding equity interventions. LEAs must report timelines, personnel responsible for implementation and how LEAs will determine strategy/activity effectiveness.

4. **Title II, Part A Budget** (ESEA/NCLB Sec. 2103, 2 CFR §200)
   Title II, Part A Specialists review the LEA Title II, Part A budget to ensure strategies and activities budgeted align with the LEA’s prioritized LEA needs and corresponding equity interventions. All planned activities must meet 1) Title II, Part A Federal program specific...
requirements and guidance, 2) Title II, Part A Georgia program specific requirements and
guidance, and 3) the US Office of Management and Budget (OMB) Uniform Administrative
Regulations, Cost Principles, and Audit Requirements for Federal Awards for fiscal
compliance. Once budgets are approved, Title II, Part A Specialists monitor LEA drawdown
of funds to ensure that LEAs are using funds in a timely manner in order to achieve the most
immediate impact on teacher and leader quality and, as a result, student achievement.

5. **On-Site Monitoring (2 CFR §200.31)**

SEA on-site Cross-Functional Monitoring Teams visit LEAs to review the criteria included in
the annual LEA Monitoring Form. LEAs are monitored based both on risk and a monitoring
cycle. Approximately one-fourth to one-third of Georgia LEAs are monitored on-site, each year.
Program staff may conduct independent on-site monitoring as needed.

6. **Desk Monitoring (2 CFR C 200.331)**

LEAs who are not subject to on-site cross-functional/ program monitoring may be subject to
desk monitoring to ensure program compliance. Usually desk monitoring is the result of
program risk assessment and/ or high monitoring findings for the previous fiscal year.
Requested information is submitted electronically through a secure site for review. If Desk
Monitoring does not include all monitoring indicators, LEAs must still submit a self-monitoring
assessment for remaining indicators.

7. **Self-Monitoring (2 CFR §200.328)**

LEAs that did not participate in an on-site monitoring process will conduct self-monitoring for
compliance with program specific indicators. LEAs will be notified annually with guidance
and a timeline as to how and when this process should occur.

8. **Single Audit (2 CFR §200.501)**

An audit is a formal or official examination of records and accounts with the intention to verify
that proper accounts have been utilized, proper procedures have been followed, and attending
documentation has been maintained. If a LEA receives grants that total more than the threshold
identified by the governing audit circular, a LEA is required to be audited annually. If an auditor
is unable to verify a program’s accounts, procedures, and documentation, the LEA and GaDOE
will be notified of an exception or audit finding(s). The Title II, Part A Program Staff will work
with the LEA to resolve any Title II, Part A audit findings.

### 1.13 Remedies for Non-Compliance

2 CFR §§200.338, 200.410; 34 CFR §81.34

The GaDOE works with state LEAs to achieve voluntary compliance before applying enforcement
options. If it is determined that a LEA has failed to comply with program requirements, as the fiscal
agent and in compliance with the Federal Grant Award Notification (GAN), the SEA may take the
following actions:

- Order the LEA to cease and desist
- Enter into a compliance agreement, also known as corrective action plan (CAROI)
- Disallow (deny both use of funds and matching credit) for all or part of the cost of the activity or action not in compliance
- Recover funds for all or part of the cost of the activity or action not in compliance
- Temporarily withhold cash payments pending correction of the deficiency by the recipient or subrecipient or more severe enforcement action by the awarding agency
- Wholly or partly suspend or terminate the current Federal Award
- Withhold further awards for the program
- Designate the LEA as high risk at the state or Federal level
• Initiate suspension or debarment proceedings (2 CFR §180)
• Take other remedies that may be legally available. (Grant Back – 34 CFR §81)

In all instances a LEA is expected to comply with processes and procedures outlined in a corrective action plan and/ or notification.

Remedies for Repeated Noncompliance
• Increased risk rating on SEA risk assessment tool
• Tiered corrective action requirements following monitoring
• Designation of High Risk LEA with the possibility of being placed on invoice review
• Targeted collaborative technical assistance completed in conjunction with monitoring

1.14 Complaint Resolution
ESEA/NCLB Sec. 9304, 9306, 9503

Grounds for Complaint
Any individual, organization or agency (complainant) may file a complaint with the GaDOE if that individual, organization or agency believes and alleges that a local educational agency (LEA), the state educational agency (SEA), or an agency or consortium of agencies is violating a federal statute or regulation that applies to a program under the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). The complaint must allege a violation that occurred not more than one year prior to the date that the complaint is received, unless a longer period is reasonable because the violation is considered systemic or ongoing.

Complaints Originating at the Local Level
As a part of their CLIP, LEAs agree to certain general and program specific assurances (ESEA/NCLB Sec. 9306). Any LEA accepting federal funds, also agrees to adopt local written procedures for the receipt and resolution of complaints alleging violations of law in the administration of covered programs. Therefore, for complaints originating at the local level, a complaint should not be filed with the GaDOE until every effort has been made to resolve the issue through local written complaint procedures. If the complainant has tried to file a complaint at the local level to no avail, the complainant must provide the GaDOE with written proof of their attempt to resolve the issue at the local level.

Filing a Complaint
A complaint must be made in writing or submitted via online web complaint form (http://programcomplaint.doe.k12.ga.us/everestwebportal/webform.asp) and signed by the complainant. The complaint must include the following:

1. A statement that the LEA, SEA, agency or consortium of agencies has violated a requirement of a federal statute or regulation that applies to an applicable program.
2. The date on which the violation occurred.
3. The facts on which the statement is based and the specific requirement allegedly violated (include citation to the federal statute or regulation).
4. A list of the names and telephone numbers of individuals who can provide additional information.
5. Whether a complaint has been filed with any other government agency, and if so, which agency.
6. Copies of all applicable documents supporting the complainant’s position.
7. The address of the complainant.

If not submitted online, the complaint must be addressed to:
Georgia Department of Education
Office of School Improvement
Teacher and Leader Effectiveness – Title II, Part A
1854 Twin Towers East
205 Jesse Hill Jr. Drive, S.E.
Atlanta, GA 30334

Once the complaint is received by the Title II, Part A Program Manager, it will be copied and forwarded to the appropriate Title II, Part A Program Specialist.

Investigation of a Complaint
Within ten days of receipt of the complaint, the Associate Superintendent or his or her designee will issue a Letter of Acknowledgement to the complainant that contains the following information:

1. The date the GaDOE received the complaint.
2. How the complainant may provide additional information.
3. A statement of the ways in which the GaDOE may investigate or address the complaint.
4. Any other pertinent information.

If the complaint involves an LEA, the GaDOE will also send a copy of the Letter of Acknowledgement to the local superintendent, along with a copy of the complaint. The GaDOE will contact the LEA to clarify the issues and review the complaint process. If the complaint cannot be resolved through this contact, the GaDOE will invite the LEA to submit a written response to the GaDOE, and to provide a copy of the response to the complainant.

Appropriate GaDOE staff will review the information and determine whether:

1. Additional information is needed.
2. An on-site investigation must be conducted.
3. Other measures must be taken to resolve the issues raised in the complaint.
4. A Letter of Findings can be issued.

If additional information or an investigation is necessary, the GaDOE will have 60 days from receipt of the information or completion of the investigation to issue a Letter of Findings.

If the Letter of Findings indicates that a violation has been found, corrective action will be required and timelines for completion will be included.

Either the 30 day or the 60 day timelines outlined above may be extended, if exceptional circumstances exist.

The Letter of Findings will be sent directly to the complainant, as well as the other parties involved.
Right of Appeal
If an individual, organization or agency is aggrieved by the final decision of the GaDOE, that individual, organization or agency has the right to request review of the decision by the U.S. Secretary of Education. The review is at the Secretary’s discretion.

For complaints filed pursuant to Title IX, Part E, Subpart 1, Sec. 9503 (20 U.S.C. § 7883, complaint process for participation of private school children), a complainant may appeal the GaDOE’s decision to the U.S. Secretary of Education no later than 30 days from the date on which the complainant receives the Letter of Findings. The appeal must be accompanied by a copy of the GaDOE’s decision and include a complete statement of the reasons supporting the appeal.

1.15 Title II, Part A Resources

Georgia Department of Education Title II, Part A Webpage

Title II, Part A is a part of the Teacher and Leader Effectiveness Division of the School Improvement Department. The website provides links to teacher quality information and resources. The site contains an electronic version of the Title II, Part A LEA Handbook, Title II, Part A Specialist contact information, required and suggested resources, sample forms and training documentation.

The Georgia Department of Education Portal Website
https://portal.doe.k12.ga.us

- Consolidated Application:
  - CLIP: Application where LEA grant coordinators submit the Title II, Part A portion of their Consolidated LEA Improvement Plan.
  - Budget: Application where LEA grant coordinators submit and amend their grant budget(s) and corresponding documentation

- LEA Monitoring: Application where LEA coordinator review monitoring reports and submit corrective action plans.

- Grants Application Invoices: Application where High Risk Designees submit Title II, Part A invoices for approval prior to drawdown of funds.

Project EQ Website – Archived Data
http://eq.gapsc.org

In response to Federal requirements, Project EQ was created by the GaPSC to provide policy makers, LEAs and other state educational agencies with a library showcasing the development and implementation of effective equity initiatives to support LEAs in providing equitable educational opportunities for all students. Prior to FY17 this is where LEAs submitted their annual Title II, Part A Equity Plan. These plans may still be referenced by the general public.
Georgia Professional Standards Commission Secure Portal Application

www.gapsc.org

- **HiQ:** The Georgia HiQ is a web-based tool used from FY04-FY16 to collect data on LEA personnel highly qualified status. It assisted LEAs in complying with the requirements of the ESEA/NCLB by profiling teachers, long-term substitutes and paraprofessionals employed in the public LEA. Educators were rated as “highly qualified” or “not highly qualified” by comparing their teaching assignments to their certification history and related factors.

- **Databank:** Databank includes various personnel reports. Specifically, certification reports that list educators holding non-renewable certificates assist Title II, Part A coordinators in verifying educators in need of remediation plans.

- **MYSPA:** Mid-Year School Personnel Analysis is a comparison of the spring and fall Certified/Classified Personnel Information (CPI) collection. MYSPA provides decision makers with a summary of key teacher populations, their distribution and how it compares to the state average.

*GaPSC Certification/Curriculum Assignment Policies System (CAPS) Website*

www.gapsc.com/Certification/CAPS.aspx

Created in 2004 by GaPSC Rule 505-2-.26 titled "IN-FIELD ASSIGNMENTS", CAPS is a web-based resource that aligns courses in the state-approved curriculum with the Georgia certificate(s) that are in-field to teach that course. The system allows a user to find a course and its appropriate certificates using four different search criteria: by choosing a subject area, entering a course number, entering an exact title or partial title, and/or choosing a grade level. CAPS also allows a user to choose a certificate field and display the courses for which that specific certificate is in-field to teach. This may help Title II, Part A Coordinators determine whether or not a certification is ‘in-field’.

### 1.16 Title II, Part A Implementation Calendar

Provided to support LEA Title II, Part A Coordinators, the Title II, Part A Implementation Calendar follows the academic school year and provides information on planning, budget and compliance, training opportunities, and program deadlines.
# TIMELINE FOR IMPLEMENTATION—JULY

<table>
<thead>
<tr>
<th>Dates</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>July 5</td>
<td>First Day LEAs may submit CLIP and LEA Equity Action Plan</td>
</tr>
<tr>
<td>July 29</td>
<td>CLIP and LEA Equity Action Plan Submission Deadline</td>
</tr>
</tbody>
</table>

## Activities

### CLIP & LEA Equity Action Plan
- Use the Title II, Part A CLIP Review Checklist to draft/revise and submit required program descriptors. Failure to meet program deadlines may result in increased risk.
- Use the LEA Equity Data Profile and LEA Equity Action Plan template to draft a plan to address current LEA equity gaps. The Plan must be uploaded as an attachment in ConApp.

### Highly Qualified & Professional Qualifications
- **HiQ:** Ensure that the Superintendent reviews the FY16 HiQ data and signs-off in the HiQ system by August 31.
- **PQ:** Upon the opening of school, distribute the Parent’s Right to Know notification. The notification must be in compliance with Federal and State laws and guidance.

### Budget & Compliance
- Begin to develop a budget based on a current needs assessment and resulting prioritized needs and identified equity gaps.
- Prepare with budget required attachments (if applicable): FY17 Budget Assertion Form, FY17 Title II, Part A LEA Effectiveness Plan, Job Descriptions, Class Size Reduction Worksheet with Schedule(s) and Class Size Verification, Private School Equitable Services Worksheet.
- Review FY16 Budget and Expenditure Detail Report for accurate and allowable grant charges. Reconcile report and/or amend budget if needed.
- If applicable, collect and file time and effort semi-annual certification (completed after the fact) for Title II, Part A funded positions in accordance with LEA written procedures.
- Ensure the LEA documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls.
- Check with finance department to ensure all FY16 funds expended to date have been drawn down. Failure to expend and draw down at least 85% of funds may result in increased risk.
- Review current fiscal year expenditure detail report, implementation plans, and budget; revise plan and amend budget as necessary.
- Using the FY16 Effectiveness Plan, review the effectiveness of Title II, Part A funded activities from the previous fiscal year.

### Monitoring
- If applicable, submit Corrective Action Plans from FY16 monitoring visit.
- Complete any requested Title II, Part A program implementation requests, such as self-monitoring, risk assessment and contact updates.

### Training Opportunities
- Developing and Revising Internal Controls and Program Procedures Webinar (July 19)
- Federal Programs Workshop (Title II, Part A will offer a virtual session)
- Charter School Budget Preparation Workshop
# Timeline for Implementation – August

<table>
<thead>
<tr>
<th>Dates</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aug. 31</td>
<td>HiQ Sign-off for Superintendent Deadline</td>
</tr>
</tbody>
</table>

## Activities

<table>
<thead>
<tr>
<th><strong>Highly Qualified &amp; Professional Qualifications</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>• <strong>HiQ:</strong> Ensure that the Superintendent reviews the FY16 HiQ data and signs-off in the HiQ system by August 31.</td>
</tr>
<tr>
<td>• <strong>PQ:</strong> Upon the opening of school, distribute the Parent’s Right to Know notification. The notification must be in compliance with Federal and State laws and guidance.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Budget &amp; Compliance</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>• Begin to develop a FY17 budget based on a current needs assessment and resulting prioritized needs and identified equity gaps.</td>
</tr>
<tr>
<td>• Prepare with budget required attachments (if applicable): FY17 Budget Assertion Form, FY17 Title II, Part A LEA Effectiveness Plan, Job Descriptions, Class Size Reduction Worksheet with Schedule(s) and Class Size Verification, Private School Equitable Services Worksheet.</td>
</tr>
<tr>
<td>• Using the FY16 Effectiveness Plan, review the effectiveness of Title II, Part A funded activities from the previous fiscal year.</td>
</tr>
<tr>
<td>• Check with finance department to ensure all FY16 funds expended to date have been drawn down. Failure to expend and draw down at least 85% of funds may result in increased risk.</td>
</tr>
<tr>
<td>• Ensure the LEA documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls.</td>
</tr>
<tr>
<td>• Review FY16 Budget and Expenditure Detail Report for accurate and allowable grant charges. Reconcile report and/or amend budget if needed.</td>
</tr>
<tr>
<td>• Review current fiscal year expenditure detail reports, implementation plans, and budget; revise plan and amend budget as necessary.</td>
</tr>
</tbody>
</table>

## Training Opportunities

| **Federal Programs Workshop (Title II, Part A will offer a virtual session)** |
| **Regional Title II, Part A Technical Assistance Workshops** |
## Timeline for Implementation – September

<table>
<thead>
<tr>
<th>Dates</th>
<th>Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sept. 30</td>
<td>Last day to obligate FY16 Title II, Part A Funds</td>
</tr>
</tbody>
</table>

### Activities

#### Budget & Compliance
- Develop and finalize a budget based on a current needs assessment and resulting prioritized needs and identified equity gaps.
- Prepare with budget required attachments (if applicable): FY17 Budget Assertion Form, FY17 Title II, Part A LEA Effectiveness Plan, Job Descriptions, Class Size Reduction Worksheet with Schedule(s) and Class Size Verification, Private School Equitable Services Worksheet.
- Using the FY16 Effectiveness Plan, review the effectiveness of Title II, Part A funded activities from the previous fiscal year.
- Review FY16 Budget and Expenditure Detail Report for accurate and allowable grant charges. Reconcile report and/ or amend budget if needed.
- Ensure the LEA draws down funds and documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls. Failure to expend and draw down at least 85% of funds may result in increased risk.
- Review current fiscal year expenditure detail reports, implementation plans, and budget; revise plan and amend budget as necessary.

#### Private Schools
- In the fall, notify private schools within the LEA’s geographic boundaries of their eligibility to participate in planning Title II, Part A professional learning activities for FY18. Send notification in coordination with Title I and other Federal programs. Send notification by certified mail and retain certified mail receipt(s) with Title II, Part A records.

#### Training Opportunities
- Federal Programs Workshop (Title II, Part A will offer a virtual session)
- Regional Title II, Part A Technical Assistance Workshops
# Timeline for Implementation – October

<table>
<thead>
<tr>
<th>Dates</th>
<th>Deadlines</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oct. 1</td>
<td>Original Title II, Part A FY17 Budget and Attachments in the ConApp Deadline</td>
</tr>
<tr>
<td>Oct. 31</td>
<td>Completion Report Deadline (from the LEA’s Finance Director)</td>
</tr>
</tbody>
</table>

## Activities

### Budget & Compliance
- Submit a budget based on a current needs assessment and resulting prioritized needs and identified equity gaps. Failure to meet program deadlines may result in increased risk.
- Submit with budget required attachments (if applicable): FY17 Budget Assertion Form, FY17 Title II, Part A LEA Effectiveness Plan, Job Descriptions, Class Size Reduction Worksheet with Schedule(s) and Class Size Verification, Private School Equitable Services Worksheet.
- Check with finance department to ensure timely submission of FY16 Completion Report. Failure to meet program deadlines may result in increased risk.
- Ensure the LEA draws down funds and documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls.
- Review current fiscal year expenditure detail report, implementation plans, and budget; revise plan and amend budget as necessary.

### Private Schools
- In the fall, notify private schools within the LEA’s geographic boundaries of their eligibility to participate in planning Title II, Part A professional learning activities for FY18. Send notification in coordination with Title I and other Federal programs. Send notification by certified mail and retain certified mail receipt(s) with Title II, Part A records.

### Training Opportunities
- Federal Programs Cross Functional Monitoring Workshop
- Regional Title II, Part A Technical Assistance Workshops
- Title II, Part A Private Schools Equitable Services Webinar
## TIMELINE FOR IMPLEMENTATION – NOVEMBER

<table>
<thead>
<tr>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Budget &amp; Compliance</strong></td>
</tr>
<tr>
<td>• Review current fiscal year Title II, Part A payroll report to ensure staff paid with Title II, Part A funds aligns with staff in approved budget.</td>
</tr>
<tr>
<td>• Ensure the LEA draws down funds and documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls.</td>
</tr>
<tr>
<td>• After approval of FY17 budget, begin to document the effectiveness of Title II, Part A funded activities.</td>
</tr>
<tr>
<td>• Review current fiscal year expenditure detail report, implementation plans, and budget; revise plan and amend budget as necessary.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Private Schools</th>
</tr>
</thead>
<tbody>
<tr>
<td>• In the fall, notify private schools within the LEA’s geographic boundaries of their eligibility to participate in planning Title II, Part A professional learning activities for FY18. Send notification in coordination with Title I and other Federal programs. Send notification by certified mail and retain certified mail receipt(s) with Title II, Part A records.</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Training Opportunities</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Regional Title II, Part A Technical Assistance Workshops</td>
</tr>
</tbody>
</table>

## TIMELINE FOR IMPLEMENTATION – DECEMBER

<table>
<thead>
<tr>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Budget &amp; Compliance</strong></td>
</tr>
<tr>
<td>• If applicable, collect and file time and effort (completed after the fact) for Title II, Part A funded positions in accordance with LEA written procedures.</td>
</tr>
<tr>
<td>• Continue to document the effectiveness of FY17 Title II, Part A funded activities.</td>
</tr>
<tr>
<td>• Ensure the LEA draws down funds and documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls.</td>
</tr>
<tr>
<td>• Review current fiscal year expenditure detail report, implementation plans, and budget; revise plan and amend budget as necessary.</td>
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<table>
<thead>
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<th>Training Opportunities</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Regional Title II, Part A Technical Assistance Workshops</td>
</tr>
</tbody>
</table>
TIMELINE FOR IMPLEMENTATION – JANUARY

<table>
<thead>
<tr>
<th>Dates</th>
<th>Deadlines</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jan. 31</td>
<td>Title II, Part A budget amendment deadline for carryover funds, if applicable.</td>
</tr>
</tbody>
</table>

**Activities**

**Budget & Compliance**
- If applicable, submit Title II, Part A budget amendment to include carryover funds by January 31. Failure to meet program deadlines may result in increased risk.
- If applicable, collect and file time and effort semi-annual certification (completed after the fact) for Title II, Part A funded positions in accordance with LEA written procedures.
- Continue to document the effectiveness of FY17 Title II, Part A funded activities.
- Ensure the LEA draws down funds and documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls.
- Review current fiscal year expenditure detail report, implementation plans, and budget; revise plan and amend budget as necessary.

**Monitoring**
- If applicable, participate in Compliance Monitoring and submit any corresponding corrective action.

**Needs Assessment**
- Conduct an annual needs assessment (January – June) with required stakeholders and compile results to inform the FY18 CLIP and LEA Equity Action Plan.

**Private Schools**
- Consult with private schools (within the LEA’s geographic area) who have requested to participate in the Title II, Part A in FY18 and build relationships that are ongoing.
### TIMELINE FOR IMPLEMENTATION – FEBRUARY

<table>
<thead>
<tr>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Budget &amp; Compliance</strong></td>
</tr>
<tr>
<td>• Continue to document the effectiveness of FY17 Title II, Part A funded activities.</td>
</tr>
<tr>
<td>• Ensure the LEA draws down funds and documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls.</td>
</tr>
<tr>
<td>• Review current fiscal year expenditure detail report, implementation plans, and budget; revise plan and amend budget as necessary.</td>
</tr>
<tr>
<td><strong>Monitoring</strong></td>
</tr>
<tr>
<td>• If applicable, participate in Compliance Monitoring and submit any corresponding corrective action.</td>
</tr>
<tr>
<td><strong>Needs Assessment</strong></td>
</tr>
<tr>
<td>• Conduct an annual needs assessment (January – June), which includes a review of the GaDOE provided Equity Data Profile, with required stakeholders and compile results to inform the FY18 CLIP and LEA Equity Action Plan.</td>
</tr>
<tr>
<td><strong>Private Schools</strong></td>
</tr>
<tr>
<td>• Consult with private schools (within the LEA’s geographic boundaries) who have requested to participate in the Title II, Part A in FY18 and build relationships that are ongoing.</td>
</tr>
<tr>
<td><strong>Training Opportunities</strong></td>
</tr>
<tr>
<td>• February 6-8 GCEL Conference (Title II, Part A will present)</td>
</tr>
<tr>
<td>• Regional Title II, Part A Technical Assistance Workshops</td>
</tr>
</tbody>
</table>
# TIMELINE FOR IMPLEMENTATION – MARCH

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<thead>
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<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Budget &amp; Compliance</strong></td>
</tr>
<tr>
<td>• Continue to document the effectiveness of FY17 Title II, Part A funded activities.</td>
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<tr>
<td>• Ensure the LEA draws down funds and documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls.</td>
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<tr>
<td>• Review current fiscal year expenditure detail report, implementation plans, and budget; revise plan and amend budget as necessary.</td>
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<tr>
<td><strong>Monitoring</strong></td>
</tr>
<tr>
<td>• If applicable, participate in Compliance Monitoring and submit any corresponding corrective action.</td>
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<tr>
<td><strong>Needs Assessment</strong></td>
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<tr>
<td>• Conduct an annual needs assessment (January – June), which includes a review of the GaDOE provided Equity Data Profile, with required stakeholders and compile results to inform the FY18 CLIP and LEA Equity Action Plan.</td>
</tr>
<tr>
<td><strong>Private Schools</strong></td>
</tr>
<tr>
<td>• Consult with private schools (within the LEA’s geographic boundaries) who have requested to participate in the Title II, Part A in FY18 and build relationships that are ongoing.</td>
</tr>
<tr>
<td><strong>Training Opportunities</strong></td>
</tr>
<tr>
<td>• Regional Title II, Part A Technical Assistance Workshops</td>
</tr>
</tbody>
</table>

# TIMELINE FOR IMPLEMENTATION – APRIL

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<thead>
<tr>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Budget &amp; Compliance</strong></td>
</tr>
<tr>
<td>• Continue to document the effectiveness of FY17 Title II, Part A funded activities.</td>
</tr>
<tr>
<td>• Ensure the LEA draws down funds and documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls.</td>
</tr>
<tr>
<td>• Review current fiscal year expenditure detail report, implementation plans, and budget; revise plan and amend budget as necessary.</td>
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<tr>
<td><strong>Monitoring</strong></td>
</tr>
<tr>
<td>• If applicable, participate in Compliance Monitoring and submit any corresponding corrective action.</td>
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<tr>
<td><strong>Needs Assessment</strong></td>
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<tr>
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<tr>
<td><strong>Training Opportunities</strong></td>
</tr>
<tr>
<td>• Regional Title II, Part A Technical Assistance Workshops</td>
</tr>
<tr>
<td>• Federal Programs CLIP Webinar</td>
</tr>
</tbody>
</table>
### Timeline for Implementation – May

<table>
<thead>
<tr>
<th>Dates</th>
<th>Deadlines</th>
</tr>
</thead>
<tbody>
<tr>
<td>May 15</td>
<td>Budget amendments through the Consolidated Application. <em>(Date set by GaDOE)</em></td>
</tr>
</tbody>
</table>

#### Activities

**Budget & Compliance**
- Continue to document the effectiveness of FY17 Title II, Part A funded activities.
- Ensure the LEA draws down funds and documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls.
- Review current fiscal year expenditure detail report, implementation plans, and budget; revise plan and amend budget as necessary.

#### Monitoring
- If applicable, participate in Compliance Monitoring and submit any corresponding corrective action.

#### Needs Assessment
- Conduct an annual needs assessment (January – June), which includes a review of the GaDOE provided Equity Data Profile, with required stakeholders and compile results to inform the FY18 CLIP and LEA Equity Action Plan.

#### Training Opportunities
- Regional Title II, Part A Technical Assistance Workshops
- Federal Programs CLIP Webinar

### Timeline for Implementation – June

#### Activities

**Budget & Compliance**
- Continue to document the effectiveness of FY17 Title II, Part A funded activities.
- Ensure the LEA draws down funds and documents time and effort (subs, stipends and staff requiring PARs) in compliance with local internal controls.
- Review current fiscal year expenditure detail report, implementation plans, and budget; revise plan and amend budget as necessary.

#### Monitoring
- If applicable, participate in Compliance Monitoring and submit any corresponding corrective action.

#### Needs Assessment
- Conduct an annual needs assessment (January – June), which includes a review of the GaDOE provided Equity Data Profile, with required stakeholders and compile results to inform the FY18 CLIP and LEA Equity Action Plan.

#### Training Opportunities
- Annual Conference
- Regional Title II, Part A Technical Assistance Workshops
### Glossary of Acronyms & Terms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CFDA</td>
<td>Code of Federal Domestic Assistance - Number assigned to the grant included on the grant allocation notification.</td>
</tr>
<tr>
<td>CFM</td>
<td>Cross Functional Monitoring - On-site monitoring conducted by a cross section of federal programs representatives from the Georgia Department of Education. Determined by a four-year monitoring cycle and program risk.</td>
</tr>
<tr>
<td>2 CFR Part 200/ UAR/ UGG</td>
<td>The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (sometimes referred to as the Uniform Grants Guidance) – see also CFR – applies to Title II, Part A</td>
</tr>
<tr>
<td>34 CFR Part 76</td>
<td>State-Administered Programs – see also CFR – applies to Title II, Part A</td>
</tr>
<tr>
<td>CLIP</td>
<td>Consolidated LEA Improvement Plan - The application for federal grants submitted annually by the LEA in the ConApp.</td>
</tr>
<tr>
<td>CNA</td>
<td>Comprehensive Needs Assessment</td>
</tr>
<tr>
<td>ConApp</td>
<td>Consolidated Application – Abbreviated ConApp is an informal reference to the GaDOE Portal.</td>
</tr>
<tr>
<td>CPI</td>
<td>Certified/ Classified Personnel Information - Report submitted by LEAs to GaDOE several times a year. Information is gathered on the individuals employed by school systems and RESAs. Personnel information is transmitted through the CPI web-based application developed by the Department.</td>
</tr>
<tr>
<td>CSP</td>
<td>Charter Schools Program</td>
</tr>
<tr>
<td>CSR</td>
<td>Class Size Reduction - A support strategy where LEAs employ a supplemental teacher in order to improve teacher effectiveness and student achievement.</td>
</tr>
<tr>
<td>Completion Reports</td>
<td>Reports submitted at the end of the 15-month grant cycle to GaDOE reporting how LEA money has actually been spent.</td>
</tr>
<tr>
<td>EDGAR</td>
<td>Education Department General Administrative Regulations - Collection of regulations from various sources governing the use of federal grant funds.</td>
</tr>
<tr>
<td>ESEA/NCLB/ESSA</td>
<td>Elementary and Secondary Education Act originally published in 1965 and later reauthorized as No Child Left Behind Act (NCLB) of 2001 and Every Student Succeeds Act (ESSA) of 2015</td>
</tr>
<tr>
<td>FAIN</td>
<td>Federal Award Identification Number - Also known as the PR/ Award Number found on the grant allocation notification. The number should appear on LEA inventory records.</td>
</tr>
<tr>
<td>Focus Schools</td>
<td>Schools identified by the SEA as needing additional support.</td>
</tr>
<tr>
<td>FTE</td>
<td>Full-Time Equivalent - A measure of instructional workload used for state budgeting, facilities planning, and local resource allocation decisions. FTE enrollment is a statement about how many students taking full study...</td>
</tr>
</tbody>
</table>
loads would generate a given number of measured or anticipated student credit hours.

<table>
<thead>
<tr>
<th>FY</th>
<th>Fiscal Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>GaDOE</td>
<td>Georgia Department of Education - The State Education Agency designated for the administration of federal programs in Georgia.</td>
</tr>
<tr>
<td>GACE</td>
<td>Georgia Assessment for the Certification of Educators - Georgia’s state-approved educator certification assessment program. The purpose of the GACE assessments is to help the GaPSC ensure that candidates have the knowledge and skills needed to perform the job of an educator in Georgia’s public schools.</td>
</tr>
<tr>
<td>GAN</td>
<td>Grant Allocation Notification - Notification from the SEA informing LEAs of their current fiscal year allocation.</td>
</tr>
<tr>
<td>GAORS</td>
<td>Grants Accounting Online Reporting System - Online reporting system in ConApp used for grant drawdowns. Commonly used by finance directors.</td>
</tr>
<tr>
<td>GaPSC</td>
<td>Georgia Professional Standards Commission - The state agency responsible for teacher certification.</td>
</tr>
<tr>
<td>GCEL</td>
<td>Georgia Compensatory for Educational Leaders - Organization comprised of federal programs leaders from Georgia local education agencies who join together to discuss, propose, and act upon issues which help children succeed in the educational community. Federal programs mid-year updates are often presented at this conference by multiple federal programs.</td>
</tr>
<tr>
<td>GEPA</td>
<td>General Education Provisions Act - A federal statute that addresses the out-of-the ordinary problems such as withholding of funds provision and cease and desist orders.</td>
</tr>
<tr>
<td>IDEA</td>
<td>The Individuals with Disabilities Education Act - A law ensuring services to children with disabilities throughout the nation. IDEA governs how states and public agencies provide early intervention, special education and related services to eligible infants, toddlers, children and youth with disabilities.</td>
</tr>
<tr>
<td>LEA</td>
<td>Local Education Agency - A local school system pursuant to local board of education control and management – includes traditional city and county school districts, state authorized charter school LEAs, and agencies designated LEA by the Official Code of Georgia.</td>
</tr>
<tr>
<td>LKES</td>
<td>Leader Keys Effectiveness System - The common evaluation system in Georgia that allows the state to ensure consistency and comparability across districts, based on a common definition of leader effectiveness.</td>
</tr>
<tr>
<td>LUA Chart of Accounts</td>
<td>Local Unit of Administration - The chart of accounts utilized by local units of administration (LUAs) in reporting budget and financial data to the Georgia Department of Education which is then reported to USDE.</td>
</tr>
<tr>
<td>MOE</td>
<td>Maintenance of Effort - LEAs must maintain a level of funding of at least 90-percent of the preceding fiscal year of the aggregate expenditures of state and local funds or the combined state and local funds per full-time equivalent (FTE).</td>
</tr>
<tr>
<td>OCGA</td>
<td>Official Code of Georgia</td>
</tr>
<tr>
<td>OMB</td>
<td>Office of Management and Budget</td>
</tr>
<tr>
<td>Acronym</td>
<td>Description</td>
</tr>
<tr>
<td>---------</td>
<td>-------------</td>
</tr>
<tr>
<td>PAR</td>
<td>Personnel Activity Report - A time and effort method capturing the breakdown of activities conducted by employees carrying out multiple cost objectives and possibly funded by multiple funding sources.</td>
</tr>
<tr>
<td>PQ</td>
<td>Professional Qualifications - Requirements for teachers and paraprofessionals determined by the state of Georgia in compliance with ESSA.</td>
</tr>
<tr>
<td>Priority Schools</td>
<td>Schools identified by SEA as needing additional support.</td>
</tr>
<tr>
<td>RESA</td>
<td>Regional Educational Service Area - 16 regional educational service agencies strategically located in service districts throughout the State of Georgia. The agencies were established for the purpose of sharing services designed to improve the effectiveness of the educational programs of member school systems. In addition, the RESAs assist the State Department of Education in promoting its initiatives. The RESAs inform systems of innovation and gather research on programs as needed.</td>
</tr>
<tr>
<td>SAHE/ IHE</td>
<td>State Agency of Higher Education/ Institution of Higher Education</td>
</tr>
<tr>
<td>SAO</td>
<td>State Accounting Office</td>
</tr>
<tr>
<td>SBOE</td>
<td>State Board of Education</td>
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<tr>
<td>SEA</td>
<td>State Education Agency</td>
</tr>
<tr>
<td>SIP</td>
<td>Schoolwide Improvement Plan</td>
</tr>
<tr>
<td>SNAP</td>
<td>Supplemental Nutrition Assistance Program - A program that offers nutrition assistance to eligible, low-income individuals and families. Families that receive SNAP are considered directly certified for the free-reduced meal status.</td>
</tr>
<tr>
<td>SNP</td>
<td>School Nutrition Program</td>
</tr>
<tr>
<td>SRSA</td>
<td>Small Rural Schools Achievement</td>
</tr>
<tr>
<td>SSIP</td>
<td>State Systemic Improvement Plan - A plan required by USDE that includes a comprehensive, multi-year focus on improving results for Students with Disabilities.</td>
</tr>
<tr>
<td>SWP</td>
<td>Schoolwide Plan</td>
</tr>
<tr>
<td>TANF</td>
<td>Temporary Assistance for Needy Families - The monthly cash assistance program with an Employment Services component for low-income families with children ages 18 and under who attend school full-time.</td>
</tr>
<tr>
<td>TKES</td>
<td>Teacher Keys Effectiveness System - The common evaluation system in Georgia that allows the state to ensure consistency and comparability across districts, based on a common definition of teacher effectiveness.</td>
</tr>
<tr>
<td>TLE</td>
<td>Teacher and Leader Effectiveness - A GaDOE division under the School Improvement Department that administers the Title II, Part A program in Georgia.</td>
</tr>
<tr>
<td>USC</td>
<td>United States Code</td>
</tr>
<tr>
<td>USDE</td>
<td>United States Department of Education</td>
</tr>
<tr>
<td>WHEO</td>
<td>White House Executive Order</td>
</tr>
</tbody>
</table>
Section 2
Planning

The following section contains information and tools for Local Education Agency (LEA) personnel that may be helpful as they 1) assess program areas, identify needs and plan for Title II, Part A activities; 2) assess their equity needs and develop a Title II, Part A LEA Equity Plan to ensure that every student, regardless of socio-economic background and learning needs, receives equitable opportunities to achieve challenging state content and academic achievement standards; 3) submit
an annual application detailing needs and procedures; and 4) develop the LEA Title II, Part A Effectiveness Plan that will drive program implementation and inform all budget decisions.

PREVIEW OF SECTION 2

2.1 Title II, Part A: Planning
2.2 Title II, Part A: Georgia Planning Resources

Title II, Part A Needs Assessment
2.3 Needs Assessment: Definition
2.4 Needs Assessment: Purpose
2.5 Needs Assessment: Stakeholder Involvement
2.6 Needs Assessment: Timeline
2.7 Needs Assessment: Required Components
2.8 Needs Assessment: Suggested Data Sources
2.9 Needs Assessment: Needs v. Strategies

Title II, Part A LEA Equity Action Plan
2.10 LEA Equity Action Plan: Purpose
2.11 LEA Equity Action Plan: Overview

Title II, Part A Consolidated LEA Improvement Plan (CLIP)
2.12 CLIP: Purpose
2.13 CLIP: Title II, Part A Descriptors

Title II, Part A LEA Effectiveness Plan
2.14 LEA Effectiveness Plan: Purpose
2.15 LEA Effectiveness Plan: Overview

2.1 Title II, Part A: Planning

Needs Assessment
- Establish a timeline for conducting the LEA Needs Assessment and Prioritizing Needs.
- Determine the roles stakeholder will have in gathering and analyzing data and prioritizing needs. Identify exactly where in the process this should be done. Consider using existing opportunities for gathering this input (i.e. school councils, leadership teams), focus groups, surveys, school meetings, etc.
- Gather data around all mandatory components.
- Summarize and analyze data to identify strengths and areas for growth.
- Prioritize the needs based on grant, state, and local requirements.
● Brainstorm possible actions to address identified needs. Consider implications and impacts of each possible action.

**Equity Plan (New Plan Required in FY17)**

● Based on the outcome of the needs assessment process, develop LEA Equity Action Plan.
● Follow LEA Equity Action Plan Rubric and Template for required components, including the selection of equity interventions for continuous improvement.

**Consolidated LEA Improvement Plan (CLIP)**

● Based on the outcome of the needs assessment process and the submitted and approved LEA Equity Action Plan, submit the official grant application (CLIP).
● Follow the CLIP Review Checklist for required components.

**Title II, Part A Effectiveness Plan**

● Based on needs assessment, approved LEA Equity Action Plan and CLIP and allocation awarded, develop a Title II, Part A Effectiveness Plan to guide LEA Title II, Part A program implementation.
● Follow the handbook guidance and online quick guide for developing the Title II, Part A Effectiveness Plan.

### 2.2 Title II, Part A: Georgia Planning Resources

- Title II, Part A Needs Assessment
  - Title II, Part A LEA Handbook
  - Needs Assessment Worksheet
  - Sample Surveys
  - Private School Needs Assessment
  - Needs Assessment Training PowerPoint
  - Title II, Part A Program Specialist
- Title II, Part A LEA Equity Action Plan
- Title II, Part A Consolidated LEA Improvement Plan (CLIP)
- Title II, Part A LEA Effectiveness Plan

### Title II, Part A Needs Assessment

#### 2.3 Needs Assessment: Definition

_ESEA/NCLB Sec. 2122_

- Assessing needs comprehensively means getting the full _breadth_ of information for _depth_ of understanding. It’s a process that collects and examines information about LEA/schoolwide issues and then utilizes that data in structured decision making that will determine priority goals, inform LEA plans, and allocate often limited funds and resources.
- It is a systematic effort to acquire an accurate, thorough picture of the strengths and areas for improvement of a school community that can be used in response to the academic needs of all students for improving student achievement and meeting challenging academic standards.
- It is a way to determine what is happening that is impacting learning and hypothesize on what the root causes might be.
In Georgia, the needs assessment is conducted in order to meet Federal Title II, Part A requirements. The Title II, Part A program office recommends that the needs assessment components required for Title II, Part A are addressed in conjunction with needs assessment components required by other titles of ESEA/NCLB.

2.4 Needs Assessment: Purpose

**ESEA/NCLB Sec. 2122**

The purpose of the Title II, Part A LEA annual needs assessment is to determine the needs of the LEA as it relates to the grant requirements in order to maintain an annual action plan of improvement. The LEA must assure that information is gathered concerning the needs of its teaching force and school leaders in order to support all students in meeting challenging State content and academic achievement standards. The needs assessment process can be completed as a component of a comprehensive needs assessment or at the program level.

2.5 Needs Assessment: Stakeholder Involvement

**ESEA/NCLB Sec. 2122(b)(7) & (c)(1-2)**

While the law requires stakeholder involvement and lists specific stakeholders to include, how the stakeholders are included is at the discretion of the LEA (e.g., through surveys, focus groups, meeting and other means of collecting data).

2016-2017 Needs Assessment (ESEA/NCLB Sec. 2122(b)(7) & (c)(1-2))

Consultation must include:

1) Teachers (including teachers participating in programs under Part A of Title I), 2) Paraprofessionals, 3) Public School Administrators, 4) Private School Administrators and 5) Parents. Georgia recommends as a best practice the inclusion of business and community partners and institutions of higher education.

2017-2018 Needs Assessment (ESEA/ESSA Sec. 2102(b-c))

Consultation must include:

1) Teachers, 2) Principals, 3) Other School Leaders, 4) Paraprofessionals (including organizations representing such individuals), 5) Specialized Instructional Support Personnel, 6) Charter School Leaders (in an LEA that has charter schools), 7) Parents, 8) Community Partners, 9) Other Organizations or Partners with Relevant and Demonstrated Expertise (related to Title II, Part A), 10) Private School Administrators

2.6 Needs Assessment: Timeline

| January – June | - Collect and analyze data from appropriate sources to ensure the needs assessment process is properly informed. Collect and archive supportive documentation for compliance.  
- Complete needs assessment and develop the LEA Equity Action Plan and Consolidated LEA Improvement Plan (CLIP) |
| July | - Submit the CLIP and LEA Equity Action Plan and begin implementation of the plan for upcoming 12 months |
| October- November | - Invite Private Schools to consult for next fiscal year |
| November-December | - Begin consultation with private schools for needs assessment |
| Ongoing | - Monitor the status of implementation |
2.7 Needs Assessment: Required Components

LEAs must explicitly address their findings (strengths and areas of growth) for each of the following components. A corresponding Needs Assessment Worksheet can be found on the Title II, Part A Resources webpage with guiding questions that should be answered and suggested source documentation for each component.

2016-2017

- **Professional Learning** (Paraprofessionals, Teachers, Assistant Principals, Principals, and Superintendents and Equity of Meeting the Needs of Diverse Student Learners)
- **Personnel** (Recruitment, Retention and Equity of Teacher Quality and Experience)
- **Factors that Impact the Learning and Work Environment** (Class Size Reduction)
- **Title II, Part A Administration** (Prioritizing Funds Equitably)

2017-2018

2.8 Needs Assessment: Suggested Data Sources

The law does not require that the needs assessment process include particular types of data. The data sources listed below are suggestions from the *Title II, Part A Non-Regulatory Guidance* and the Georgia Title II, Part A program staff.

- **Student Achievement**: Local Assessments, National Assessments, State Assessments
- **Professional Learning**: Demographic Data, Equity Data Profile, PL Course Schedule, PL Evaluations, PL Focus Walks, PL Participation, Stakeholder Surveys, Student Achievement Data, Student Attendance, Student Discipline, TKES/ LKES Observations
- **Personnel**: Equity Data Profile, Exit Surveys, HR Feedback, Induction Feedback, MySPA, Staff Attendance, Stakeholder Surveys, TEM/ LEM Scores, TKES/ LKES Observations
- **Factors that Impact the Learning and Work Environments**: Attendance Data, CCRPI, Demographic Data, Discipline Data, Program Data, Stakeholder Surveys
• **Title II, Part A Administration:** Audit Reports, Effectiveness Data, Equity Data Profile, Internal Controls, Monitoring Reports, Program Data, School Data, School Improvement School List, Stakeholder Surveys

### 2.9 Needs Assessment: Needs v. Strategies

A need is a situation where something should be addressed, while a strategy is a strategic plan or method for achieving a particular goal usually over a long period of time. Be careful to distinguish between these. For example, LEAs will sometimes list Class Size Reduction as a prioritized need. Class Size Reduction is not a need. A LEA’s data may show that math test scores drop between 8th and 9th grade and that class sizes increase from one grade to the next. The need is to provide interventions to improve student achievement in math in ninth grade. You might use strategies like class size reduction (Title II, Part A), tutorial (Title I, Part A) and PLC’s (State Professional Learning Funds) in order to address this need.

### TITLE II, PART A LEA EQUITY ACTION PLAN

The LEA Equity Action Plan Rubric and Template is available for reference on the GaDOE Title II, Part A website.

#### 2.10 LEA Equity Action Plan: Purpose

**ESEA/ESSA Sec. 1111(g)(1)(B), 1112(b)(2), 2101(d)(2), 2103(b)(3)(B);**

*Georgia Department of Education Equitable Access to Effective Educators State Plan 2015*

The USDE requires that states provide all students, especially low-income and minority students, with equitable access to effective educators and actively work to close any identified achievement gaps. ESEA/ESSA places a major emphasis upon teacher quality as an important factor in improving student learning.

ESEA/ESSA and the *USDE Transitioning to ESSA FAQs* (May 4, 2016) address the SEA and LEA requirements for providing equitable opportunities in the following sections of the law:

- ESEA/ESSA 1111(g)(1)(B) – Title I, Part A SEA Plan
- ESEA/ESSA 1112(b)(2) – Title I, Part A LEA Plan
- ESEA/ESSA 2101(d)(2)(E) – Title II, Part A SEA Application
- ESEA/ESSA 2103(b)(3)(B) – Title II, Part A LEA Use of Funds

*The Equitable Access to Effective Educators State Plan (2015)* addresses Georgia’s state strategy of requiring annual LEA Equity Action Plans in the following themes and strategies:

- Theme 2: Improve Teacher and Principal Effectiveness, Strategies 3 & 4
- Theme 3: Improve Retention and Professional Growth
- Theme 4: Factors that Impact the Learning and Working Environment, Strategy

#### 2.11 LEA Equity Action Plan: Overview

**ESEA/ESSA Sec. 1111(g)(1)(B), 1112(b)(2), 2101(d)(2), 2103(b)(3)(B);**

*Georgia Department of Education Equitable Access to Effective Educators State Plan 2015*

- **LEA Equity Data Profile** – Provided by the GaDOE, this profile provides the most recent state level data, LEA data and school data on variables such as CCRPI, MGP, Teacher Experience, Teacher Assignments, Teacher Absences, Teacher and Principal Retention, Student Discipline Data, Graduation Rate, and Teacher and Leader Effectiveness Scores
• LEA Equity Action Plan Template – Due July 29 with the CLIP submission
  o Section 1: Review of LEA Equity Data Profile
    Using the GaDOE provided LEA Equity Data Profile or LEA provided data, LEAs analyze current data for equity gaps.
  o Section 2: Choosing Equity Interventions
    LEAs select equity interventions based on identified needs.
  o Section 3: Equity Interventions for Reducing LEA Equity Gaps
    LEAs describe how the selected equity intervention will be implemented, monitored, and measured for effectiveness in the current fiscal year.
  o Section 4: Using Title II, Part A Funding to Support Equity Gap Reduction
    NOT APPLICABLE IN FY17 – LEAs select Title II, Part A authorized use of funds used to support selected Equity Interventions.
  o Section 5: Authority
    No Action Required – A resource page that includes excerpts from ESEA/ESSA and the Georgia Equitable Access to Effective Educators State Plan.
  o Section 6: Equity Data Profile Definitions
    No Action Required – A resource page that includes definitions for each of the LEA Equity Data Profile variables.

CONSOLIDATED LEA IMPROVEMENT PLAN (CLIP)
The LEA CLIP Review Checklist is available for reference on the GaDOE Title II, Part A website.

2.12 CLIP: Purpose
ESEA/NCLB Sec. 9305; 2122(b)
ESEA/NCLB allows LEAs to submit one comprehensive LEA improvement plan for all funding sources authorized under ESEA/NCLB. The CLIP must address the needs assessment requirements outlined in each Title program under ESEA/NCLB.

2.13 CLIP: Title II, Part A Descriptors
ESEA/NCLB Sec. 2122(b)
Each program determines the content each descriptor must include in order to meet program requirements. Below is a brief summary of the Title II, Part A requirements for the current fiscal year. Detailed instructions can be found in the Title II, Part A CLIP Review Checklist found on the Title II, Part A Resources page of the GaDOE Title II, Part A website.

<table>
<thead>
<tr>
<th>Descriptor</th>
<th>CLIP Descriptor Focus</th>
<th>Title II, Part A Contribution</th>
</tr>
</thead>
</table>
| Descriptor 1 | Analysis of Needs | • Needs Assessment Process  
| | | • Summary and Analysis of Needs  
| | | • Prioritized List of Title II, Part A Funding Needs for FY17 |
| Descriptor 18 | HiQ Requirements (Title not updated for FY17) | Required Parent Notification |
| Descriptor 19 | Providing PL | Description of Providing PL |
| Descriptor 21 | Coordination of Funds | Coordination of Funds to Meet PL Needs |
**Title II, Part A LEA Effectiveness Plan**

### 2.14 LEA Effectiveness Plan: Purpose

**ESEA/NCLB Sec. 2101(2), 2 CFR §200.328**

In compliance with Federal expectations and those of the Title II, Part A program, the GaDOE requires local education agencies to submit an annual Title II, Part A LEA Effectiveness Plan. The preceding needs assessment and resulting LEA Equity Action Plan and CLIP will guide the LEA’s development of the Title II, Part A Effectiveness Plan funded strategies and expenditure of funds. Preferably, this plan will be developed in conjunction with the System Improvement Plan. LEAs are encouraged to not replicate efforts, but recognize the close supportive relationship between Title II, Part A and the other initiatives.

### 2.15 LEA Effectiveness Plan: Overview

**ESEA/NCLB Sec. 2101(2), 2 CFR §200.328**

The Title II, Part A LEA Effectiveness Plan includes written procedures detailing how, in the current fiscal year, the LEA will assess the effectiveness of Title II, Part A funded strategies in each funded program component in addressing one or more needs identified by the LEA. *The effectiveness of fund transfers must be included.* Currently, LEAs may design and utilize their own formatting, though a quick guide containing guidance and a recommended template is available on the Title II, Part A Resources page of the GaDOE Title II, Part A website. This annual Title II, Part A LEA Effectiveness Plan must be submitted prior to budget approval and should be uploaded as an attachment to the Consolidated Application.

The Title II, Part A LEA Effectiveness Plan must explicitly address:

1. The Title II, Part A Funded Component(s)
2. The need(s) being addressed
3. Identification of the Title II, Part A funded strategy(ies)
4. The data to be collected to determine effectiveness
5. The position of the person responsible for collecting the data and coordinating the review and analysis of the data
6. The timeline for collecting data and completing the review and analysis of the data
This section addresses parent notifications as required by The Elementary and Secondary Education Act of 1965 (ESEA) as reauthorized by NCLB and ESSA and explained in USDE FAQs Transitioning to ESSA.
PREVIEW OF SECTION 3

3.1 Highly Qualified Transitions to Professional Qualifications

USDE Transitioning to ESSA FAQs (May 4, 2016)

With the reauthorization of ESEA/NCLB as ESEA/ESSA, highly qualified requirements that existed under NCLB are suspended for the 2016-2017 school year as states transition to identifying the professional qualifications required for ESEA/ESSA. The GaDOE will release information throughout 2016-2017 as it becomes available. Training opportunities will be provided. At this time it is recommended that LEAs continue to hire teachers with demonstrated content area expertise (certification, major or coursework, assessments) in the fields in which they are assigned. In FY18, the State will begin reporting 1) inexperienced teachers, principals and other school leaders, 2) teachers teaching with emergency or provisional credentials, 3) teachers who are not teaching in the subject or field for which the teacher is certified or licensed (ESEA/ESSA Sec. 1111(h)(1)&(5)).

3.2 The Role of the Georgia Department of Education

O.C.G.A. §20-2-240

The GaDOE is the designated State Education Agency (SEA) for receiving and administering Title II, Part A Improving Teacher Quality State Grants. The GaDOE provides resources and support to LEAs so that Federal, State and local Title II, Part A goals may be met. A network of Title II, Part A Education Program Specialists is available to provide information about Title II, Part A requirements, assist with data needs and local planning, and support teacher preparation and professional development initiatives. The GaDOE determines the professional qualifications required to meet the Federal requirements outlined in the Every Student Succeeds Act (ESSA).

3.3 The Role of the Georgia Professional Standards Commission

O.C.G.A. §20-2-982 through §20-2-989

Under state law, the Georgia Professional Standards Commission (GaPSC) is the agency in charge of establishing and enforcing professional teaching standards and certifying and licensing teachers.

3.4 Required Notification: Right to Know

ESEA/NCLB Sec. 1111(h)(6)(A-B), USDE Transitioning to ESSA FAQs (May 4, 2016)

Parent’s Right to Request a Teacher’s and a Paraprofessional’s Qualifications

By law, LEAs are required to notify parents that they may request information regarding the teacher’s or the paraprofessional’s professional qualifications, including the following:
Whether the teacher/paraprofessional has met the Georgia Professional Standards Commission certification requirements for the grade level and subject area(s) in which the teacher provides instruction;

Whether the teacher is teaching under an emergency or other provisional status through which Georgia qualifications or certification criteria have been waived;

The college major and any graduate certification or degree held by the teacher;

Whether the student is provided services by paraprofessionals, and if so, their qualifications.

LEAs must:

- Notify parents in a format that is understandable and will ensure that all parents have the opportunity to receive the information. To the extent practicable, the notification should be provided in a language that parents may understand. This may include, but is not limited to a LEA or school handbook, a letter mailed home, inclusion in a newsletter, posting on a website, and/or a school-wide email.
- Ensure the notification or document that contains the notification must include the principal’s contact information, the school or LEA name, the date/month and year of notification.
- Maintain records that document the dissemination of the right to know in multiple forms to the parents of all students.

### 3.5 20 Day Parent Notification Letter

**ESEA/NCLB Sec. 1111(h)(6)(A-B); USDE Transitioning to ESSA FAQs (May 4, 2016)**

In FY17 LEAs will **NOT** be required to send 20 Day parent notification letters. While not required, the GaDOE Title II, Part A program office recommends that LEAs continue to follow established procedures of notification in order to maintain consistency, to support students and teachers, and to assist with the transition from ESEA/NCLB to ESEA/ESSA. Required 20 Day parent notifications will resume in FY18 once Georgia has established professional qualifications under ESEA/ESSA.

### 3.6 ESEA/NCLB Professional Requirements for Paraprofessionals

**ESEA/NCLB Sec. 1119 (c-d)**

ESEA/NCLB requires that all paraprofessionals who work in a program supported by Title I, Part A funds (Schoolwide Program or Targeted Assistance Program) meet certain professional requirements. These paraprofessional requirements do not apply to those working in pre-kindergarten classrooms unless the position is funded by Title I, Part A. Georgia requires **all** paraprofessionals to meet these same requirements.

#### Requirements for Paraprofessionals

All paraprofessionals must have:

- Completed at least 2 years of study at an institution of higher education; or
- Obtained an associate’s (or higher) degree; or
- Met a rigorous standard of quality and can demonstrate, through the Georgia state-approved paraprofessional assessment:
  a. Knowledge of, and the ability to assist in instructing, reading, writing, and mathematics; or
  b. Knowledge of and the ability to assist in instructing, reading readiness, writing readiness, and mathematics readiness, as appropriate.

**Georgia Paraprofessionals**
All Georgia paraprofessionals must hold a valid state paraprofessional certificate issued by the Georgia Professional Standards Commission.

\textit{Note: An educator holding a valid Teaching Certificate in Induction- Pathway 1, 2 or 3, Professional, Lead Professional, and Advanced Professional Certificates, has met the requirements and does not need to also hold a Paraprofessional Certificate.}

\textbf{Two Years of Study}

Two years of study at an institution of higher education requires completion of a minimum of 60 semester hours or 90 quarter hours at a GaPSC approved, accepted institution of higher education.

\textbf{Paraprofessionals – Definition}

A paraprofessional is an individual with instructional duties. Individuals who work solely in non-instructional roles, such as aides, food service, cafeteria or playground supervision, personal care services, and non-instructional computer assistance are not considered to be paraprofessionals for Title I purposes. The requirements do not apply to individuals who work with special education students performing non-instructional duties, such as assisting with mobility and bodily functions. The requirements do not apply to individuals with: (a) primary duties to act as a translator or (b) duties consisting solely of conducting Parental Involvement Activities. (See Title I, Part A, Section 1119 c-g.)

\textbf{Requirements for Paraprofessionals in Non-Title I Schools}

While Federal requirements apply only to paraprofessionals employed in Title I-supported programs, all Georgia paraprofessionals must hold a valid state certificate issued by the GaPSC. To be eligible for the clear renewable paraprofessional certificate, the applicant must:

\begin{itemize}
  \item Be employed as a paraprofessional in a Georgia LEA. The request for issuance of the certificate must be submitted electronically to the GAPSC from the employing LEA using the Paraprofessional Automated Certification (PAC) system.
  \item Have an associate’s degree or higher from an accredited, GaPSC accepted institution of higher education in any subject OR have completed two years college coursework (60 semester hours) OR have passed a PSC-approved paraprofessional assessment. If eligibility is established through the assessment, the applicant must also hold a high school diploma or GED equivalent.
\end{itemize}

\textbf{3.8 Professional Requirements for Paraprofessionals in Charter Schools, Charter LEAs, and Strategic Waivers School Systems that Do Not Require Certification}

\textit{ESEA Sec. 1119 (c-g)}

ESEA/NCLB requires that all paraprofessionals who work in a program supported by Title I, Part A funds (Schoolwide Program or Targeted Assistance Program) meet certain professional requirements. The paraprofessional requirements do not apply to those working in pre-kindergarten classrooms unless the position is funded by Title I, Part A.

\textbf{Requirements for New Paraprofessionals}

New paraprofessionals hired after January 8, 2002, to work in Title I schools, (based on state certification rule 505-2-.11) must have:

\begin{itemize}
  \item Completed at least 2 years of study at an institution of higher education; or
  \item Obtained an associate's (or higher) degree; or
\end{itemize}
• Demonstrate academic content knowledge in reading, writing, and mathematics through the Georgia state-approved paraprofessional assessment.

Two Years of Study
Two years of study at an institution of higher education requires completion of a minimum of 60 semester hours or 90 quarter hours at a GaPSC approved, accepted institution of higher education.

Paraprofessionals: Definition
A paraprofessional is an individual with instructional duties. Individuals who work solely in non-instructional roles, such as aides, food service, cafeteria or playground supervision, personal care services, and non-instructional computer assistance are not considered to be paraprofessionals for Title I purposes. The requirements do not apply to individuals who work with special education students performing non-instructional duties, such as assisting with mobility and bodily functions. The requirements do not apply to individuals with: (a) primary duties to act as a translator or (b) duties consisting solely of conducting parental involvement activities.

3.8 Frequently Asked Questions
USDE Transitioning to ESSA FAQs (May 4, 2016)

A-4b. Are there any NCLB requirements with which a State or LEA need not comply during the 2016-2017 school year?
Yes. In order to ensure an orderly transition from ESEA requirements under the NCLB to those under the ESSA, ED has identified the following provisions with which a State or LEA need not comply during the 2016-2017 school year because those provisions are not continued under ESSA:

1. Section 1111(h)(1)(C)(ii) and (h)(2) of the ESEA, as amended by NCLB, which require each State and LEA to report performance against AMOs (see C-9);
2. Section 1111(h)(6)(B)(ii) of the ESEA, as amended by NCLB, which requires a school to notify parents when their child has been assigned to, or has been taught for four or more consecutive weeks by, a teacher who is not highly qualified (see D-3);
3. Section 1117 of the ESEA, as amended by NCLB, which requires a State to provide certain types of school supports and recognition (see C-6);
4. Section 1119 of the ESEA, as amended by NCLB, which requires that each LEA hire highly qualified teachers; that each State and LEA report on progress toward all teachers being highly qualified; and that each LEA ensure that paraprofessionals meet certain qualifications and perform certain duties (see C-7);
5. Section 2141 of the ESEA, as amended by NCLB, which requires an LEA not making progress toward all teachers being highly qualified to create and implement an improvement plan and requires the State to provide technical assistance to such LEA (see D-2);
6. Section 3122(a) of the ESEA, as amended by NCLB, which requires each State to establish annual measurable achievement objectives (AMAOs) (see E-1); and,
7. Section 3302(b) of the ESEA, as amended by NCLB, which requires each LEA receiving Title III funds that fails to meet one or more of the AMAOs to provide notice to parents of such failure (see E-3).
As ED continues to analyze the ESSA, it may update this list as necessary. Please note, however, that any requirements not explicitly excluded through this document, or forthcoming guidance, remain required through the 2016-2017 school year.

C-7. Must a State and its LEAs continue to comply with the requirements in section 1119 of the ESEA, as amended by NCLB, which describe certain requirements for teachers and paraprofessionals?

A State and its LEAs must continue to comply with section 1119 of the ESEA, as amended by NCLB, through the 2015-2016 school year, including the requirement that a State and LEA report information related to highly qualified teachers based on the 2014–2015 and 2015–2016 school years. For the reasons described in A-4b, ED is not requiring States to comply with the requirements in section 1119 of the ESEA, as amended by NCLB, beginning in the 2016-2017 school year, which set forth requirements for highly qualified teachers, and use of funds to support compliance with the highly qualified teacher requirements.

D-1a. Must a State ensure that special education teachers are “highly qualified,” as defined in section 9101 of the ESEA, as amended by NCLB, in the 2016-2017 school year?

No. The ESSA amended the Individuals with Disabilities Education Act (IDEA) by removing the definition of “highly qualified” in section 602(10) and the requirement in section 612(a)(14)(C) that special education teachers be “highly qualified” by the deadline established in section 1119(a)(2) of the ESEA, as amended by NCLB. Accordingly, a State is not required to ensure that special education teachers are “highly qualified” as defined in the ESEA beginning with the 2016-2017 school year but must ensure that they meet the requirements described in D-1b.

D-1b. If the definition of “highly qualified” is no longer applicable to special education teachers, what are the federal requirements related to the professional qualifications of those teachers?

Section 9214(d)(2) of the ESSA amended section 612(a)(14)(C) of the IDEA by incorporating the requirement previously in section 602(10)(B) that a person employed as a special education teacher in elementary school, middle school, or secondary school must: 1) have obtained full certification as a special education teacher (including certification obtained through alternative routes to certification), or passed the State special education teacher licensing examination and hold a license to teach in the State as a special education teacher, except that a special education teacher teaching in a public charter school must meet the requirements set forth in the State’s public charter school law; 2) not have had special education certification or licensure requirements waived on an emergency, temporary, or provisional basis; and 3) hold at least a bachelor’s degree. Each State must continue to comply with these certification requirements during the 2016-2017 school year.

D-2. Must a State continue to comply with the requirements in section 2141 of the ESEA, as amended by NCLB, under which the State must ensure that LEAs take certain actions if they do not make progress toward all teachers being highly qualified and do not make AYP?

Each State must continue to comply with section 2141 through the 2015-2016 school year. For the reasons described in A-4b, ED is not requiring States to comply with the requirements in section 2141 of the ESEA, as amended by NCLB, in the 2016-2017 school year. Specifically, section 2141 of the ESEA, as amended by NCLB, requires an LEA to take certain actions if it does not make progress toward all teachers being highly qualified and does not make AYP, including developing an improvement plan. Thus, beginning in the 2016-2017 school year, an LEA is not required to develop an improvement plan or restrict the use of Federal education funds pursuant to such a plan,
and a State is not required to provide the LEA the technical assistance that would be required to develop such a plan. Additionally, the State is not required to enter into the agreement required by section 2141(c) of the ESEA, as amended by NCLB, with an LEA. In addition, an LEA is no longer restricted in its use of Title I, Part A funds for hiring paraprofessionals.

D-3. Must a school continue to comply with section 1111(h)(6)(B)(ii) of the ESEA, as amended by NCLB, which requires a school to notify parents when their child has been assigned to, or has been taught for four or more consecutive weeks by, a teacher who is not highly qualified? No. For the reasons described in A-4b, ED is not requiring States to comply with the requirements in section 1111(h)(6)(B)(ii) of the ESEA, as amended by NCLB, beginning with the 2016-2017 school year. Schools will no longer be required to provide notice to parents related to the highly qualified status of their child’s teacher. Please note that LEAs are required to continue with section 1111(h)(6)(A) of the ESEA, as amended by NCLB, which requires an LEA to notify parents that they may request and the LEA will provide certain information regarding the professional qualifications of the student’s teachers and paraprofessionals, as appropriate.
Section 4
Fiscal Management

The following section provides guidance to assist Georgia’s school administrators with the management of fiscal and programmatic implementation.
# Preview of Section 4

**Fiscal Program Management**

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- 4.2 Federal and State Title II, Part A Assurances
- 4.3 Internal Controls (Policies, Processes, and Procedures)
- 4.4 Records Retention
- 4.5 Period of Performance: Obligations
- 4.6 Required Use of Funds
- 4.7 Supplement Not Supplant Provision
- 4.8 Expenditures: Authorization, Segregation of Duties, Cost Allowability, and Reconciliation
- 4.9 Procurement Levels
- 4.10 Coordination and Proration of Funds
- 4.11 Equipment and Inventory
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- 4.14 Schoolwide Funding
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4.1 Resources
All LEAs are required to adhere to Federal, State and local laws, regulations and guidance.

- STATUTE: Elementary and Secondary Education Act of 1965 (ESEA)/
  No Child Left Behind Act of 2001 (NCLB)/
  General Education Provisions Act (GEPA); 20 USC 31
- FEDERAL LAW: Education Department General Administrative Regulations (EDGAR)
  o 34 CFR §76 State-Administered Programs
  o 2 CFR §200 Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- FEDERAL GUIDANCE: U.S. Department of Education (USDE)
  o Title II, Part A Non-Regulatory Guidance
  o Title IX, Part E Non-Regulatory Guidance (Private Schools)
  o Policy Letters & FAQs
- STATE LAW: Georgia Public Schools and Open Records Act; O.C.G.A. §50-18-70
- STATE GUIDANCE:
  o State Board of Education Rules
  o Professional Standards Commission Rules
  o GaDOE LEA Title II, Part A Handbook and Subsequent Resources and Guidance
  o GaDOE Title II, Part A Education Program Specialist Technical Assistance

4.2 Federal and State Title II, Part A Assurances
As a condition of receiving the state and Federal funds for which application is made in the GaDOE Portal Consolidated Application, the LEA applicant’s local board of education (Applicant) agrees to certain general and program specific assurances including, but not limited to compliance with all associated Federal and state plans, statutes, regulations, etc. governing the terms of the grant. This grant is governed by Statute, Non-Regulatory Guidance, 34 CFR §76 and 2 CFR §200.

Notification of allocations to SEAs includes a mandate to communicate to subgrantees that SEAs and LEAs will manage the grant in compliance with USDE cash management policies for grants, in accordance with the Federal Funding Accountability and Transparency Act, in accordance with the special conditions for disclosing Federal funding in public announcements as found in the Consolidated Appropriations Act of 2014 and in compliance with CFR single audit requirements.
In accordance with the conditions of Executive Order 13513, “Federal Leadership on Reducing Text Messaging While Driving” (2009) grant recipients, sub recipients and grant personnel are prohibited from text messaging while driving a government owned vehicle, or while driving their own privately owned vehicle during official grant business, or from using government supplied electronic equipment to text message or email when driving. In addition, the grant condition specified in 2 CFR §175.15(b) is incorporated into this grant with two changes as determined by USDE.

4.3 Internal Controls (Policies, Processes and Procedures)

**2 CFR §200.303**

LEAs MUST establish and maintain effective fiscal control and fund accounting procedures (internal controls) over the Federal award that provide reasonable assurance that the LEA is compliantly managing the Federal award. Internal controls can be defined as a process, implemented by a LEA designed to provide reasonable assurance regarding the achievement of objectives in the following categories: effectiveness and efficiency in operations, reliability of reporting for internal and external use, and compliance with applicable laws and regulations (2 CFR §200.61). The goal of internal controls is to reduce fraud, waste and abuse in the use of Federal funds. LEAs must adequately safeguard all assets and assure that they are used solely for authorized purposes.

Some internal controls are captured in LEA board policies, and some are informal and maintained by a LEA’s Federal programs division or grant coordinator. Processes and procedures governing the LEA implementation of the Title II, Part A grant should be reviewed routinely and revised as needed. If in the course of monitoring and audits, a revision of internal controls is required, LEAs must take prompt action.

A quick guide outlining required written internal controls is available on the Title II, Part A Resources page of the GaDOE website.

4.4 Records Retention

**2 CFR §§200.333, 200.335; 34 CFR §81.31(c)**

- All financial and programmatic records and supporting documents must be kept for three years from the date the LEA submits its Completion Report to GaDOE (due date October 31). However, any LEA with carryover must maintain records for five years. The GaDOE recommends all grant records are maintained for five years.
- If any litigation, claim, negotiation, audit or other action involving the records has been started before the expiration of the 3-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular 3-year period, whichever is later.
- Title II, Part A Coordinator should follow the Records Retention Schedule for his/her LEA as long as that schedule includes, at a minimum, the Federal requirements.
- When original records are electronic and cannot be altered, there is no need to create and retain paper copies. LEAs must ensure electronic media is subject to periodic quality reviews, must provide reasonable safeguards against alteration and remain readable. As technology improves, if keeping electronic records, LEAs must ensure records are accessible and readable.
**4.5 Period of Performance: Obligations**

<table>
<thead>
<tr>
<th>Type of Obligation</th>
<th>When Obligation Occurs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approved Pre-Agreement Cost</td>
<td>On the first day of the grant performance period (obligation does not assume allowability)</td>
</tr>
<tr>
<td>Personal Services by Employee</td>
<td>When services are performed</td>
</tr>
<tr>
<td>Personal Services by Contractor</td>
<td>Date of binding written commitment</td>
</tr>
<tr>
<td>Licensing Contract</td>
<td>Date of binding written commitment</td>
</tr>
<tr>
<td>Acquisition of Property</td>
<td>Date of binding written commitment</td>
</tr>
<tr>
<td>Rental of Property</td>
<td>When LEA uses property</td>
</tr>
<tr>
<td>Travel</td>
<td>When travel is taken</td>
</tr>
</tbody>
</table>

Period of performance means the time during which the non-Federal entity (LEA) may incur new obligations to carry out the work authorized under the Federal award (Title II, Part A). For Title II, Part A the period of performance is July 1 of the current fiscal year through September 30 of the following year (15 months). A non-Federal entity (LEA) may charge to the Federal award (Title II, Part A) only allowable costs incurred during the period of performance. LEAs are encouraged to expend funds early in the grant cycle so as to benefit from the impact of funds during the period of performance.

Contracts and Period of Performance (2 CFR §200.318(b))

While contracts obligated during the period of performance may have services that extend beyond the period of performance; in Georgia, payments (in part or in whole) for contracts should not be made prior to the completion of corresponding services. It is recommended that LEAs develop contracts in such a way that they adhere to the period of performance. Failure to do so may result in findings and remittance of funds.

Licensing and Renewal and Period of Performance (34 CFR §76.707)

It is recommended that A) LEAs set up initial licensing in accordance with the grant period of performance or B) LEAs temporarily prorate licensing until the start of the grant period of performance and then license for a year. LEAs may choose to exercise a multi-year licensing; however, in Georgia, this is only allowable to the extent that payments are not made for services that extend beyond the grant period of performance. In addition, it is recommended that any multi-year agreement incorporate a contingency clause that addresses continuation assuming availability of funds and continued allowability.

**4.6 Required Use of Funds**

LEAs are required to budget Title II, Part A funds to support the following:

- **Equity:** Implementation of the LEA Equity Action Plan that identifies at least two equity interventions as a focus for improvement.
- **Priority and/ or Focus Schools:** Professional learning needs of teachers and school administrators at each Priority and/ or Focus school unless the LEA can document the professional learning needs for one or more of these schools are adequately funded through other sources.
- **Private Schools:** Private Schools located within the geographic boundaries of the LEA, in accordance with Title IX, Part E.
LEAs may budget other funds to achieve these requirements, however this must be documented prior to budget approval.

4.7 Supplement Not Supplant Provision

Federal law states that, “Funds received under this subpart shall be used to supplement, and not supplant, non-Federal funds that would otherwise be used for activities authorized under this subpart.”

To clarify, Title II, Part A funds may be used only to supplement educational program activities provided with state and local funds. The LEA may not use Title II, Part A funds to pay for activities that, in the absence of these funds, would be provided with state and local funds. Title II, Part A funds may be used to fund only the professional development activities that supplement those mandated locally or by the state, and can supplement those discretionary professional development activities that the LEA would fund in the absence of other local and/or state funding sources.

In the following instances, it is presumed that supplanting has occurred if:

- The LEA used Federal funds (except Bilingual) to provide services that were required under other Federal, state or local laws.
  
  Note: The rule is that all available local, state, or non-Federal funds must be spent to provide a service required under other Federal, state, or local laws before funds may be used to provide that service. For example, suppose that a state law requires and funds professional development to improve teacher knowledge of core academic subjects, which is an allowed local use of Title II, Part A funds under ESEA/NCLB Sec. 2123(a)(3)(A). LEAs would be expected to expend all of the state funds first, after which they could use funds for additional professional development of this sort – which is supplementing. Otherwise, if Title II, Part A funds were used while state funds were still available, the USDE would presume that the Title II, Part A funds were being used to free up the state funds for other uses – which is supplanting.

- The LEA used Federal funds to provide services that were provided with non-Federal funds in the prior year.
  
  Note: Rebuttal is particularly plausible at a time when state and local education budgets are being cut nationwide. If, however, a LEA wishes to show that it used funds to provide a service that was provided last year with state or local funds, the LEA must prove its case with documentation (e.g., budget information, board action, planning documents or other materials specific to the program or grade level at which the funds are being applied).

These presumptions are rebuttable if the LEA can demonstrate that it would not have provided the services in question with non-Federal funds had the Federal funds not been available.

Precipitous Decline: Documenting the LEA is Supplementing and Not Supplanting Funds

Review existing documents such as the LEA’s past fiscal year and current fiscal annual state budgets and local revenues. The LEA’s finance department should consult with the GaDOE if it is faced with precipitous decline. On a program level, if it appears that there is a question as to whether or not the LEA is supplanting in a case of precipitous decline, the Title II, Part A Program Office recommends that LEAs write a narrative explaining how funds will be used to supplement the current fiscal year budget that has been reduced since the previous year. Place these items, along with other supporting documentation, in a file that would be available in the event of an audit.
Coordinators should discuss the local circumstances with their Title II, Part A specialist to determine if supplementing with Title II, Part A funds is viable in the event of fund reductions from other sources.

### 4.8 Expenditures: Authorization, Segregation of Duties, Cost Allowability, Reconciliation

| 2 CFR §§200.302(b)(5); 200.303(a); 200.403-405; 200.414; GAO-14-704G Standards for Internal Control in the Federal Government (2014 p. 45) -10.03 |

**Authorization**

Prior to charging the Title II, Part A grant, all Title II, Part A expenditures must receive written approval by the LEA designated Title II, Part A Coordinator who should have current fiscal year knowledge of the grant expectations. All expenditures charged to the grant should be reviewed for adherence to Federal and State laws, regulations and guidance.

**Segregation of Duties**

Written controls must outline how LEA management divides or segregates key duties and responsibilities among different people to reduce the risk of error, misuse, or fraud. This includes separating the responsibilities for authorizing transactions, processing and recording them, reviewing the transactions, and handling any related assets so that no one individual controls all key aspects of a transaction or event.

**Cost Allowability**

Costs must meet the following general criteria:

- Conform to Title II, Part A regulations and guidance.
- Be consistent with written internal controls (policies and procedures) that apply uniformly to both federally funded and non-Federally funded LEA activities. (Travel and stipends for staff providing or receiving professional learning)
- Be necessary, reasonable and allocable to the performance of Title II, Part A.
  - Reasonable means costs should not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The cost should be in the LEA/school improvement plan(s); should reflect sound business practices; and should reflect market prices for comparable goods and services for the geographic area.
  - Allocable means able to be charged to Title II, Part A. Costs must be incurred specifically for Title II, Part A; must benefit both the grant and LEA work; must be necessary to the operation of the LEA and distinguishable as a Title II, Part A asset.
- Be adequately documented. (see Source Documentation)

When determining the allowability of expenditures consider these questions:

- How does the action/item support the LEA’s Title II, Part A prioritized needs and selected equity interventions?
- Does the LEA have a viable plan (plan/timeline/person(s) responsible for monitoring implementation and results) to determine the effectiveness of this action/item in meeting desired outcomes?
- Is this action/item required by any local, state, or Federal (other than Title II, Part A) policy or procedure? (If so, this is supplanting.) Would the LEA provide this action/item in the absence of Title II, Part A Program funds? (If so, this is supplanting.)
- What is the research base and evidence of effectiveness of this action/item?
What is the plan for sustainability/future costs to support the action/item?

Reconciliation of Accounting Records
The LEA should have written procedures for regularly monitoring program budgets and actual expenditures to ensure accuracy and the reconciliation of discrepancies.

### 4.9 Procurement Levels

<table>
<thead>
<tr>
<th>Procurement Level</th>
<th>Cost Limit</th>
<th>Documentation Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Micro-purchase</td>
<td>Up to $3,500</td>
<td>Up to $3,500</td>
</tr>
<tr>
<td>Small Purchase</td>
<td>Up to $150,000</td>
<td>Up to $150,000</td>
</tr>
<tr>
<td>Simplified Acquisition Threshold</td>
<td>$150,000+</td>
<td>RFP – sealed bids</td>
</tr>
</tbody>
</table>

LEAs must have written procurement procedures that, at a minimum, must meet Federal requirements. Written procedures include conflict of interest, contract oversight, competition and procurement (including evaluation and selection criteria). During monitoring, Title II, Part A should be able to determine that expenditures follow local procurement procedures, including documentation required for purchasing at designated thresholds. Please contact your Title II, Part A specialist with any questions regarding appropriate documentation.

If a micro-purchase is questioned, a review of websites would be sufficient to establish the cost as reasonable. (*USDE FAQs on 2 CFR Part 200, Subpart D Question 19, March 17, 2016*)

*USDE FAQs on 2 CFR Part 200, Subpart D Question 10, March 17, 2016* states that including vendors who are contractors in writing RFPs limits competition.

### 4.10 Coordination and Proration of Funds

Many of the central objectives of the Title II, Part A program are shared with other Federal and state programs. This commonly applies to providing professional learning. As a LEA budgets for district prioritized needs, the LEA may consider coordinating Title II, Part A funds with other Federal, state, and local funds to address the professional learning needs of the LEA (CLIP Descriptor 21). When coordinating, the LEA should consider the allowability of expenditures and ensure that it is using the funds in a way that is supplementing rather than supplanting.

LEAs are responsible for planning for and ensuring that expenditures that are not fully Title II, Part A allowable and/ or do not fully align with the LEA’s prioritized needs are appropriately prorated. Commonly this applies to

- Software whose audience or content extends beyond that which is allowable;
- Salaries in which duties and responsibilities extend beyond the scope of what is allowable or where compensation is funded by multiple funding sources;
- Equipment/inventory that is purchased with multiple funding sources;
- Contracted services that include unallowable administrative fees or activities and/ or deliverables that extend beyond the scope of the Title II, Part A grant program; and
• Conferences and/or workshops where content extends beyond what is allowable and aligns with prioritized needs (includes associated travel or material expenses).

In instances where expenditures must be prorated, LEAs must maintain documentation of how the proration was determined. If included in a budget, the proration (salary, software, equipment, etc.) should be indicated in some format in the budget description.

**4.11 Equipment and Inventory**

*2 CFR §§200.313, 200.453*

**Equipment**
LEAs should have written internal controls (policies and/or procedures) governing the acquisition, use, inventory, maintenance and disposition of equipment, including how purchased equipment will be safeguarded to prevent loss, damage or theft. The LEA should adhere to the following:

- Equipment must be purchased for Title II, Part A allowable purposes and must be supplemental.
- Equipment must be in approved budget.
- Written controls must adhere to federal government regulations.
- Equipment must be used for authorized purposes of the grant program during the period of performance or until the property is no longer needed for the purposes of the project. During the time that the equipment is used on the project or program for which it was acquired, the LEA must also make it available for use on other projects or programs currently or previously supported by the Federal government, provided that such use will not interfere with the work on the projects or program for which it was originally required. Use for non-federally-funded programs or projects is also permissible.

**Inventory**
All LEAs should have local technology procedures in place and remain in compliance. In addition, electronic equipment purchased entirely or in part with Title II, Part A funds must be used in compliance with Title II, Part A allowable activities. They should also be recorded in a LEAs inventory that must include, but is not limited to:

- The item
- The item description with vendor
- The cost
- The source of funding (percent if prorated)
- The Federal Award Identification Number (FAIN) (found on Grant Award Notification)
- The date of acquisition
- The item serial number or other identification number
- The location of the equipment
- The use and current condition of the item
- The record of the disposition of the item (including the transfer of equipment to another funding source)

Physical inventory of property must be taken at least once every two years and the results and records must be reconciled. GaDOE Federal Programs monitor for inventory records every year through either on-site monitoring or LEA self-monitoring.
<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>PR/ Award # (FAIN) (Federal Award ID Number)</th>
<th>CFDA (Catalog of Federal Domestic Assistance)</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY17</td>
<td>S367A160001</td>
<td>84.367A</td>
</tr>
<tr>
<td>FY16</td>
<td>S367A150001</td>
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<tr>
<td>FY15</td>
<td>S367A140001</td>
<td>84.367A</td>
</tr>
<tr>
<td>FY14</td>
<td>S367A130001</td>
<td>84.367A</td>
</tr>
</tbody>
</table>

### 4.12 Source Documentation

<table>
<thead>
<tr>
<th>Source Documenta</th>
</tr>
</thead>
<tbody>
<tr>
<td>20 USC §1232(f); 2 CFR §§200.302(b)(3), 200.333, 200.403(g), 200.501(d) 200.508(d); 34 CFR §81.31(c)</td>
</tr>
</tbody>
</table>

LEAs are required to keep source documentation on file for each expenditure. Documentation must be made available during audits and program monitoring. Documentation will vary from LEA to LEA and expenditure to expenditure. However, all documentation should be sufficient to determine that expenditures are allowable and used according to Federal, state and local statutes, regulations, policies, guidance and procedures, and terms and conditions of the Federal Award and are reasonable and necessary, supplemental to non-Federal funds, and align with the Title II, Part A budget. These records must contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation. Common source documentation includes: purchase orders, detailed invoices, travel expense statements, agendas from conferences, contracts for services, attendance rosters and leave forms, etc. A Title II, Part A quick guide outlining appropriate source documentation for common program expenditures is available on the Title II, Part A Resources page of the GaDOE website.

As a reminder, 2 CFR §200.415 (citing 18 USC §1001) requires that LEAs assert that they understand that submitting any false, fictitious, or fraudulent information, or the omission of any material fact(s), may subject the LEA employee(s) to criminal, civil, or administrative penalties for fraud, false statements, false claims or otherwise. In addition, actions of this nature would constitute a violation of the Georgia Code of Ethics (O.C.G.A. §20-2-984.1).

### 4.13 Indirect Costs

<table>
<thead>
<tr>
<th>Source Documenta</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title II, Part A Non-Regulatory Guidance E-2; 2 CFR §200.414; 34 CFR §76.560-569</td>
</tr>
</tbody>
</table>

LEAs may choose to budget indirect costs incurred by LEAs in support of implementing Title II, Part A. The restricted rate must be approved by the GaDOE. All funds must be expended for activities related to the approved application. For information on Indirect Costs, visit the following link: [http://www.doe.k12.ga.us/Finance-and-Business-Operations/Financial-Review/Pages/default.aspx](http://www.doe.k12.ga.us/Finance-and-Business-Operations/Financial-Review/Pages/default.aspx). LEA staff desiring to apply the indirect cost rate should work with their business office to calculate the amount. Remember:

1. LEAs must have a state approved indirect costs rate.
2. Equipment purchases must be deducted before applying the indirect cost rate.
3. The indirect costs must be removed from the balance before the indirect cost rate can be applied (this prevents paying indirect costs on indirect costs).

For further information contact the Georgia Department of Education, Office of Finances, 1666 Twin Towers East, Atlanta, Georgia 30334, Tel. (404) 656-2492, Fax (404) 656-0816
Any Title I school with 40% or more of its students living in poverty, regardless of the grades it serves, may operate a schoolwide program. The USDE Transitioning to ESSA FAQs (May 4, 2016) allows priority and focus schools to waive the 40% poverty requirement. If a LEA chooses to consolidate Title II, Part A funds under a schoolwide budget, the LEA Title II, Part A Coordinator must work closely with the assigned Title II, Part A Specialist to ensure compliance with meeting the intents and purposes of the program.


Georgia’s Flexibility Waiver (First Approved in March of 2012, Amended July 2014)
While Georgia’s transferability waiver allowed all LEAs to transfer up to 100% of funds, the waiver will expire in August 2016. All requirements will revert back to ESEA/NCLB with the exception of priority and focus schools, as outlined in the paragraph below.

Transfer of Funds 2016-2017 (USDE Transitioning to ESSA FAQs, May 4, 2016)
As of the passing of ESEA/ESSA in December 2015, State flexibility waivers will expire August 2016 for the 2016-2017 school year. This means that Georgia’s flexibility allowing LEAs to transfer up to 100% of funds is no longer applicable and reverts to the original restrictions with the exception of Title I priority and focus schools.

- LEAs Without Priority and Focus School - may transfer up to 50%
- LEAs With Priority and Focus Schools - may transfer up to 100% of allocations reserved for priority and focus schools

Guidelines on Transferability
- The funds you transfer into Title I, Part A become Title I, Part A funds subject to all rules and regulations for Title I, Part A.
- LEAs should think about how the transfer of funds will impact any of their required set-asides. The transferred funds may impact the required set-asides including those for parental involvement and private schools.
• The Title II, Part A consultant/specialist who works with the district must be notified in writing (email) about the district’s intent to transfer Title II, Part A funds to Title I, Part A prior to submitting the Title II, Part A budget for approval. This is for notification NOT approval.

• The district must notify in writing (email) the GaDOE’s Grants Accounting Department about the district’s intent to transfer Title II, Part A funds to Title I, Part A prior to the transfer. This is for notification NOT approval.

• The district superintendent must write a letter to the Title I, Part A Programs Director at GaDOE, stating the district’s intent to transfer Title II, Part A funds into Title I, Part A, sign the letter, scan the letter to a pdf file, and attach the letter to the Attachment Tab in the consolidated application prior to signing off on the Title I, Part A budget. This is for notification and record-keeping NOT approval.

• In the Title II, Part A Budget, budget all funds except those to be transferred. When transferring:
  o From Program Title II, Part A to Program Title I, Part A
  o Function 5000, Object 930, Amount

### 4.16 Budget Codes Overview

#### Guidance

- State LUA Chart of Accounts
  

- Title II, Part A Budget Function and Object Code Quick Guide (Available online)

#### Application

Finance directors receive updated accounting guidance from the GaDOE annually. Detailed guidance and questions around accounting methods should be directed to your LEAs finance department. Generally, Title II, Part A Coordinators receive accounting guidance through finance directors. This section is a program-specific general overview. Program-specific coding questions should be directed to your assigned Title II, Part A Specialist.

- When reading an annual, quarterly or monthly detailed expenditure report coordinators can identify the fund source and intended expense by looking at the coding
  
  EXAMPLE: 414-1784 -2210 -116
  
  • 414 (FUND: Government Funds),
  • 1784 (PROGRAM: Title II, Part A),
  • 2210 (FUNCTION: Improvement of Instructional Services),
  • 116 (OBJECT: Stipends)

- Available Function and Object Code combinations are unique to each program. Not all LUA Chart of Accounts function and object codes are available when budgeting. As a rule, parameters for use of function and object code combinations are determined by the objectives and allowable activities of a program.

- LEAs must use the LUA Chart of Accounts OR have a corresponding crosswalk.

- Function Code- Major category for spending
  
  The function describes the activity for which a service or material is acquired. The functions are classified into five broad areas. Functions are further broken down into sub-
functions and areas of responsibility.

<table>
<thead>
<tr>
<th>Function</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1000</td>
<td>Instruction</td>
</tr>
<tr>
<td>2210</td>
<td>Improvement of Instructional Services</td>
</tr>
<tr>
<td>2230</td>
<td>Federal Grant Administration</td>
</tr>
<tr>
<td>2300</td>
<td>General Administration</td>
</tr>
<tr>
<td>2400</td>
<td>School Administration</td>
</tr>
<tr>
<td>2800</td>
<td>Support Services - Central</td>
</tr>
</tbody>
</table>

- **Object Code**– Further categories for defining expenditures
  The object describes the service or commodity obtained as the result of a specific expenditure. There are nine major object categories which may be further subdivided.

<table>
<thead>
<tr>
<th>Object</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>100</td>
<td>Personal Services - Salary</td>
</tr>
<tr>
<td>200</td>
<td>Personal Services – Employee Benefits (Employer Costs)</td>
</tr>
<tr>
<td>300</td>
<td>Purchased Professional and Technical Services</td>
</tr>
<tr>
<td>400</td>
<td>Purchased Property Services</td>
</tr>
<tr>
<td>500</td>
<td>Other Purchased Services</td>
</tr>
<tr>
<td>600</td>
<td>Supplies</td>
</tr>
<tr>
<td>700</td>
<td>Property</td>
</tr>
<tr>
<td>800</td>
<td>Other Objects</td>
</tr>
<tr>
<td>900</td>
<td>Other Uses</td>
</tr>
</tbody>
</table>

- **How it Works**: By combining function and object codes LEAs are able to specifically categorize proposed expenditures

<table>
<thead>
<tr>
<th>Function Code</th>
<th>Object Code</th>
<th>Program Expenditure</th>
</tr>
</thead>
<tbody>
<tr>
<td>1000</td>
<td>+ 210</td>
<td>1000 210 Health Benefits for Class Size Reduction Teacher</td>
</tr>
<tr>
<td>2210</td>
<td>+ 210</td>
<td>2210 210 Health Benefits for Salary Instructional Leaders (Academic Coaches)</td>
</tr>
<tr>
<td>2230</td>
<td>+ 210</td>
<td>2230 210 Health Benefits for Title II, Part A Coordinator</td>
</tr>
</tbody>
</table>
4.17 Consolidated Application – CLIP and Budget

ESEA/NCLB Sec. 9305

The Consolidated LEA Improvement Plan (CLIP) application for funding is made through the GaDOE Portal, Consolidated Application for Funding which is administered by the GaDOE Federal Programs and Grants Accounting Divisions. The information needed to complete the application and amendments is made available annually at https://portal.doe.k12.ga.us/Index.aspx. This is REQUIRED prior to budgeting. Individual LEA Title II, Part A grant allocations will be posted on the budget page of the consolidated application after allocations have been approved by the Georgia State Board of Education. Title II, Part A program questions should be directed to the LEA’s Title II, Part A Education Specialist. Consolidated Application technical questions should be directed to the GaDOE on-line portal “Help D-Ticket”. Specific information about Title II, Part A requirements the annual budget can be found on the Title II, Part A website.

4.18 Developing and Monitoring a Title II, Part A Budget

The following guidance outlines a process for planning and managing Title II, Part A budget implementation to ensure continuous program improvement.

<table>
<thead>
<tr>
<th>Planning</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The Title II, Part A LEA Effectiveness Plan (prioritized needs) MUST guide the development of the LEAs Title II, Part A budget.</td>
</tr>
<tr>
<td>• Use the Budget Review Checklist as a guide.</td>
</tr>
<tr>
<td>• Prepare and include for approval <strong>required</strong> budget attachments (including, but not limited to): Title II, Part A LEA Effectiveness Plan, Budget Assertion Form, Job Description(s), Class Size Reduction Worksheet with Schedule(s) and Class Size Verification, and Private School Equitable Services Worksheet.</td>
</tr>
<tr>
<td>• LEAs are charged with expending funds in the year in which they are allocated to effectively implement the Title II, Part A program.</td>
</tr>
<tr>
<td>• Funds carried over from the previous year must be expended completely.</td>
</tr>
</tbody>
</table>
| Entry | • Enter the budget line items by function and object in accordance with LUA Chart of Accounts AND Title II, Part A Budget Code Guide.  
• Compose descriptions that align to program requirements, succinctly capture intent of expenditures and provide sufficient detail to determine allowability under Title II, Part A. If applicable, budget items that are prorated (for example: contracts, equipment and software) must include percent funded by Title II, Part A in the description. LEAs should also include the content/focus of training and intended participants when describing professional learning activities. Avoid acronyms.  
• Reporting Tab: A combination of both pre-filled and manual entry data, this data captures summary effectiveness data of the LEA’s implementation of Title II, Part A. This is completed once annually prior to budget approval.  
• Program Tab: This is a summary review of the LEA budget. It draws from the budget codes used in the budget. It is imperative that LEAs use ONLY APPROVED codes. There are several sections that will need to be completed by the coordinator. This will need to be updated with any budget amendment in which the number of Title II, Part A funded staff is adjusted. |
| Approval | • All Title II, Part A Coordinators require access to the GaDOE Consolidated Application. Access is administered at the LEA level.  
• LEA Designated Title II, Part A Coordinator submits budget. Reminder: All LEA Staff administering the Title II, Part A Grant MUST have current (annual) knowledge of program requirements.  
• LEA Superintendent reviews and approves budget or requests revision(s).  
• GaDOE Title II, Part A Specialist reviews and approves budget or requests revision(s).  
• GaDOE Grants Accounting approves budget. |
| Implementation | • Implement budget and expenditures as planned. The Title II, Part A Effectiveness Plan identifies the person(s) responsible for implementing the activity/strategy, documenting the implementation of the strategy/activity, and evaluating the effectiveness of the strategy/activity. (This will ensure timely drawdown, accurate record-keeping, and implementation reporting.) |
| Monitoring | **Monitor the Progress of the Effectiveness Plan**  

- Periodically review the Title II, Part A Effectiveness Plan, then consult with person(s) responsible for implementing activities and strategies in the plan and determine implementation status of each activity/strategy (in progress, completed, to begin on (date), cancelled).  

**Monitor Detailed Expenditure and Payroll Reports**  

- Ensure all actual expenditures align to the Title II, Part A Effectiveness Plan and funds budgeted.  
- Ensure alignment between staff paid with Title II, Part A funds and positions in the approved budget.  
- If one or more salaries (not stipends) are partially paid by Title II, Part A, ensure the percentage of salary paid from Title II, Part A reflects the percentage budgeted. In addition, ensure that appropriate and corresponding time and effort is documented and on file.  
- Ensure payments for substitute teachers are accurately and completely recorded for Title II, Part A CSR teachers and teachers engaging in Title II, Part A funded professional development activities.

**Monitor Expenditure Source Documentation**  

- Ensure all charges to the grants are authorized by the Title II, Part A coordinator.  
- Ensure all payments or reimbursements for travel and/or registration costs are supported by documentation (i.e., conference/professional learning agendas with sessions attended highlighted) that indicates the activity is allowable under Title II, Part A and aligns with the Title II, Part A budget and prioritized needs.  

| Reconciliation | **Reconciliations**  

- Discuss any questions about payment details with the Finance Director or other appropriate personnel in the finance office.  
- Check to see if there have been changes in salary or benefits since the original budget that need to be reflected in the budget.  
- Compare expenditures recorded for each activity/strategy in the Title II, Part A Plan to funds budgeted. If planned activities or purchases are canceled, adjustments may need to be made to the budget.  
- Check for unauthorized or unallowable payments and payments that should have been made by Title II, Part A. If found, ensure journal entries are made to transfer funds to an appropriate funding source. Keep explanatory documentation.  

| Amendments (Adjustment of the Plan and Budget) | - Budget amendments are required for the Title II, Part A Program any time there is an increase or decrease in the total grant, a change in the scope of the grant, and/or a 25 percent change at the function level. The last day to submit a budget amendment is May 15, unless otherwise specified. All budget amendments require the Superintendent approval and sign-off. Amendments to include carry-over must be submitted by January 31.
- Add new activities/strategies to the plan and budget as additional funds become available either through additional allocations or as a result of planned activities being cancelled. Identify 1) person(s), by position, responsible for implementing each new activity strategy, 2) the timeline for implementation, 3) the documentation required to show implementation and effectiveness of the strategy/activity, and 4) the timeline for implementation.
- Remove activities/strategies from the plan and budget that will not be implemented.
- LEAs are encouraged to work with their assigned Title II, Part A Specialist to plan for carryover. Funds carried over from the previous year must be expended completely. |

| Drawdown of Funds 2 CFR §200.305(b) | - In Georgia, Title II, Part A is administered through a reimbursement payment process. This means that after preparing a budget and having it approved, LEAs must obligate and complete payment prior to the drawdown of funds. Drawing down funds prior to payment constitutes a cash advance process which is subject to different laws.
- LEAs are expected to encumber and draw down the Title II, Part A funds available to them in a timely manner. In an effort to assist LEAs in complying with timely drawdown of funds, the Title II, Part A Education Specialists will periodically review the drawdown of funds documented on the GaDOE Grants Accounting Online Reporting System (GAORS) for each of the LEAs assigned to them.
- To minimize the time elapsing between drawdown and disbursement and ensure accurate accounting records the LEA should have written internal controls. |

| Reporting 2 CFR §200.302 | - LEAs must report accurate, current, and complete disclosure of the financial results of Federal award in accordance with the reporting requirements. The Completion Report for each fiscal year is due October 31 of the next fiscal year (30 days after the end of the grant period). The Completion Report is used to report the expenditures from grant funds. |
4.19 LEA Authorized Use of Funds

ESEA/NCLB Sec. 2123

LEAs are allowed the flexibility to design and implement a number of different activities that can result in a teaching staff that is qualified and able to help all students, regardless of individual learning needs, achieve challenging state content and academic achievement standards. The funds may also be used to provide school principals with the knowledge and skills necessary to lead their schools’ efforts to increase student academic achievement.

Section 2123 of the statute specifically authorizes the following types of activities:

<table>
<thead>
<tr>
<th>Authorized Use of Funds #1</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Developing and implementing mechanisms to assist schools in effectively recruiting and retaining highly qualified teachers, including specialists in core academic subjects, principals, and pupil services personnel, except that funds made available under this paragraph may be used for pupil services personnel only —</td>
</tr>
<tr>
<td>(A) if the local educational agency is making progress toward meeting the annual measurable objectives described in ESEA/NCLB Sec. 1119(a)(2); and</td>
</tr>
<tr>
<td>(B) in a manner consistent with mechanisms to assist schools in effectively recruiting and retaining highly qualified teachers and principals.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Authorized Use of Funds #2</th>
</tr>
</thead>
<tbody>
<tr>
<td>(2) Developing and implementing initiatives to assist in recruiting highly qualified teachers (particularly initiatives that have proven effective in retaining highly qualified teachers), and hiring highly qualified teachers, who will be assigned teaching positions within their fields, including —</td>
</tr>
<tr>
<td>(A) providing scholarships, signing bonuses, or other financial incentives, such as differential pay, for teachers to teach —</td>
</tr>
<tr>
<td>(i) in academic subjects in which there exists a shortage of highly qualified teachers within a school or within the local educational agency; and</td>
</tr>
<tr>
<td>(ii) in schools in which there exists a shortage of highly qualified teachers;</td>
</tr>
<tr>
<td>(B) recruiting and hiring highly qualified teachers to reduce class size, particularly in the early grades; and</td>
</tr>
<tr>
<td>(C) establishing programs that —</td>
</tr>
<tr>
<td>(i) train and hire regular and special education teachers (which may include hiring special education teachers to team-teach in classrooms that contain both children with disabilities and nondisabled children);</td>
</tr>
<tr>
<td>(ii) train and hire highly qualified teachers of special needs children, as well as teaching specialists in core academic subjects who will provide increased individualized instruction to students;</td>
</tr>
</tbody>
</table>
| (iii) recruit qualified professionals from other fields, including highly qualified paraprofessionals, and provide such professionals with alternative routes to teacher certification, including developing and implementing hiring policies that ensure comprehensive recruitment efforts as a way to expand the applicant pool, such as through identifying teachers certified through...
alternative routes, and using a system of intensive screening designed to hire
the most qualified applicants; and
(iv) provide increased opportunities for minorities, individuals with disabilities,
and other individuals underrepresented in the teaching profession.

**Authorized Use of Funds #3**

(3) Providing professional development activities--
   (A) that improve the knowledge of teachers and principals and, in appropriate cases,
   paraprofessionals, concerning--
   (i) one or more of the core academic subjects that the teachers teach; and
   (ii) effective instructional strategies, methods, and skills, and use of challenging
   State academic content standards and student academic achievement
   standards, and State assessments, to improve teaching practices and student
   academic achievement; and
   (B) that improve the knowledge of teachers and principals and, in appropriate cases,
   paraprofessionals, concerning effective instructional practices and that--
   (i) involve collaborative groups of teachers and administrators;
   (ii) provide training in how to teach and address the needs of students with
   different learning styles, particularly students with disabilities, students with
   special learning needs (including students who are gifted and talented), and
   students with limited English proficiency;
   (iii) provide training in methods of—
   (I) improving student behavior in the classroom; and
   (II) identifying early and appropriate interventions to help students described
   in clause (ii) learn;
   (iv) provide training to enable teachers and principals to involve parents in their
   child's education, especially parents of limited English proficient and
   immigrant children; and
   (v) provide training on how to understand and use data and assessments to
   improve classroom practice and student learning.

**Authorized Use of Funds #4**

(4) Developing and implementing initiatives to promote retention of highly qualified teachers
and principals, particularly within elementary schools and secondary schools with a high
percentage of low-achieving students, including programs that provide--
   (A) teacher mentoring from exemplary teachers, principals, or superintendents;
   (B) induction and support for teachers and principals during their first 3 years of
   employment as teachers or principals, respectively;
   (C) incentives, including financial incentives, to retain teachers who have a record of
   success in helping low-achieving students improve their academic achievement; or
   (D) incentives, including financial incentives, to principals who have a record of
   improving the academic achievement of all students, but particularly students from
   economically disadvantaged families, students from racial and ethnic minority groups,
   and students with disabilities.

**Authorized Use of Funds #5**

(5) Carrying out programs and activities that are designed to improve the quality of the teacher
force, such as--
   (A) innovative professional development programs (which may be provided through
   partnerships including institutions of higher education), including programs that train
teachers and principals to integrate technology into curricula and instruction to improve teaching, learning, and technology literacy, are consistent with the requirements of section 9101, and are coordinated with activities carried out under part D; (B) development and use of proven, cost-effective strategies for the implementation of professional development activities, such as through the use of technology and distance learning; (C) tenure reform; (D) merit pay programs; and (E) testing of elementary school and secondary school teachers in the academic subjects that the teachers teach.

**Authorized Use of Funds #6**

6. Carrying out professional development activities designed to improve the quality of principals and superintendents, including the development and support of academies to help talented aspiring or current principals and superintendents become outstanding managers and educational leaders.

**Authorized Use of Funds #7**

7. Hiring highly qualified teachers, including teachers who become highly qualified through State and local alternative routes to certification, and special education teachers, in order to reduce class size, particularly in the early grades.

**Authorized Use of Funds #8**

8. Carrying out teacher advancement initiatives that promote professional growth and emphasize multiple career paths (such as paths to becoming a career teacher, mentor teacher, or exemplary teacher) and pay differentiation.

**Authorized Use of Funds #9**

9. Carrying out programs and activities related to exemplary teachers.

4.20 Personnel: Class Size Reduction

The LEA CSR Worksheet and a CSR Quick Guide are available for reference on the GaDOE Title II, Part A website.

**Title I, Part A and Title II, Part A requirements for funding class size reduction teachers may vary depending on the circumstance.**

LEAs may reduce class sizes by creating additional classes in a particular grade or subject/course and placing qualified teachers hired with program funds in those classes. However, because of space constraints and other concerns, this is not always feasible. There are other methods of reducing class size that are effective in assisting students in increasing their level of achievement. For instance, the benefits of smaller class size can be provided by the creation of smaller instructional groups, served by qualified teachers, for sustained blocks of time on a regular basis. Some examples of how LEAs might use this strategy to reduce class size include but are not limited to:

- Having two qualified teachers team teach in a single classroom for either part of the school day or the entire day;
- Hiring an additional qualified teacher for a grade level (e.g., providing three teachers for two 3rd grade classes) and dividing the students among the teachers for sustained periods of instruction each day in core academic subjects, such as reading and math;
• Hiring an additional qualified teacher who works with half the students in a class for reading or math instruction, while the other half remains with the regular classroom teacher.

LEAs have the flexibility to explore these and other alternatives for reducing class sizes, provided that qualified teachers are used. Generally, the manner in which LEA’s reduce class size should result in a meaningful reduction for all of the students in the class on a regular basis. Research shows that “pull-out” programs involving reducing class size by only a handful of students, or sporadic reduction of class size, are less likely than other methods of class size reduction to result in increased achievement for students. Therefore, the law only permits a LEA to pay teacher salaries when needed for “class size reduction.” That is, the reduction of the size of a class must occur on a full-time basis, not a reduction in the size of a class during times when a portion of the class is removed for special group instruction.

Other considerations for LEAs in using funds for class size reduction:
• Qualified class size teachers must teach in positions that exist to reduce class size. Federal funds cannot be used to meet state or local class size requirements.
• Class size reduction supported with funds can be based upon pupil teacher ratio needs and/or student performance needs.
• Class size reductions must be applied to the extent for success to be realistic. Reducing present class size by only one or two students is not supported by the research.
• The school and grade level at which the class size reduction is being applied must be in the greater need category for the LEA.
• LEAs must be mindful that “class size reduction” supported with Title II, Part A funds must be listed as a strategy to meet prioritized needs as assessed by the annual needs assessment and listed in the ConApp. If applicable, this strategy should also be listed in the LEA/school improvement plan and the LEA Title II, Part A Effectiveness Plan.
• Class Size Reduction funds cannot be used to reduce class size for the purpose of serving students in EIP, REP, gifted, or special education programs. Where reduced class size is the delivery model used to implement special programs (EIP, REP, Gifted), state/ local funds must FIRST be used to reduce class size to comply with GaDOE (or for Charter LEAs and Strategic Waiver School Systems officially established) class size guidance. AFTER an LEA has reduced class size to meet the special program requirements, Title II, Part A funds may be used to further reduce class size.

LEAs will need to be very cautious when applying funds to reduce class size by retaining classroom teacher positions that have been previously funded by state or local funds. It can be done but the LEA must maintain documentation supporting the reduction of funds from the previous fiscal year at the program level equal to the amount or greater than the amount of funds being applied to reduce class size at that program level. The LEA can generate the need for retaining a position by calculating the class size averages if the position were eliminated compared to the class average if the position is retained. The calculated class size averages still must be above the LEA average in order to apply funds. One method for determining a reduction of state funds is to divide the program (K, 1-3, 4-5, 6-8, 9-12) funds for teachers on the previous year’s LEA allotment sheet by the number of students served that year for a per student amount. The same calculation is done with the current year allotment amount for a comparison with the previous per student amount. Multiply the difference by the number of students being served by the applicable program. The calculated reduced amount must be equal or greater than the amount of Title II, Part A funds budgeted for the
class size reduction position(s). Always contact your Title II, Part A Specialist when considering class size reduction funded.

**Title II, Part A CSR Required Documentation**
- FY17 Class Size Reduction Worksheet
- Official verification of LEA established class size maximums for 2016-2017 (statement of board action signed by Superintendent, LEA administrative procedure including class size maximums signed by Superintendent, etc.) (Charter LEAs and Strategic School Waiver Systems waiving State board class size rule)
- School master schedule in chart format for each school in which a class size reduction teacher is placed; both first and second semesters if applicable
  - Delivery model for the EIP, REP, Gifted, Special Education by school, grade level, and/or content area indicated on the master schedule
  - Daily schedule for all teachers in the school or at least in the grade level or content area where CSR teacher is placed
  - Daily schedules of teachers grouped by grade level or content area (i.e., all first grade teachers followed by second grade teachers, etc. or all math teachers followed by science teachers etc.);
    - **Self-contained classes:**
      - Grade level
      - Total number of students in each class
      - Number of regular education students
      - Number of students being served in EIP
      - Number of students being served in REP
      - Number of students being served in Gifted
    - **Departmentalized classes:**
      - Course name for each class
      - Total number of students in each class
      - Number of regular education students
      - Number of students being served in EIP
      - Number of students being served in REP
      - Number of students being served in Gifted

**Professional Development vs. Class-Size Reduction Activities**
While LEAs have flexibility to determine how best to use their Title II, Part A funds to secure a high-quality teaching force with the knowledge and skills to enable all students to achieve academically, the law requires that the LEA describe how it is meeting the professional development needs of its teachers and principals with the funds it receives. *Therefore, the law anticipates that unless a LEA can demonstrate that its teachers and principals have no professional development needs, the LEA will include professional development in whatever mix of activities it decides to support with funds.*

**4.21 Personnel: Administrative Positions**
LEAs must restrict the use of Title II, Part A funds for central office/LEA-level administrative positions to 10 percent or less of the annual original grant amount. If more than 10 percent of the annual allocation is budgeted for central office/LEA-level administrative positions, the LEA must:
• Document a hardship need and/or effectiveness of the position in addressing prioritized needs,
• Obtain the written approval of the education specialist.

Administrative positions that are funded must supplement rather than supplant required state positions and have a written job description that has been approved by the LEA’s assigned GaDOE Title II, Part A specialist. The portion of the job funded by Title II, Part A should correspond proportionally with Title II, Part A allowable duties and responsibilities. LEAs must include the percent of each position funded in budget description.

### 4.22 Personnel: Other Personnel
*SBOE 160-5-1-.22*

A LEA may fund other personnel if each position:
- Directly supports the implementation of the LEA’s Title II, Part A prioritized needs;
- Is allowable under the auspices of the Title II, Part A program;
- Supplements rather than supplants required state positions (see GaDOE Board Rule 160-5-1-.22);
- Has a written job description that has been approved by the LEA’s assigned GaDOE Title II, Part A specialist. The portion of the job funded by Title II, Part A should correspond proportionally with Title II, Part A allowable duties and responsibilities. LEAs must include the percent of each position funded in budget description.

### 4.23 Personnel: Additional Compensation (Supplements, Honorariums and Stipends)
*2 CFR §200.403(c); SBOE 160-3-3-.04*

- **Additional Compensation: Supplements, Honorariums**: These are funds received for providing services above and beyond salary. This is commonly used for funding mentors and paying teachers to provide professional learning. This may extend to internal contracts with LEA staff. LEAs should use object code 199.
- **Additional Compensation: Stipends**: Stipend – funds awarded by an LEA to certified personnel and paraprofessionals for having successfully completed learning opportunities that have occurred at any time during the fiscal year outside of the employee’s normal contract/work hours. LEAs should use object code 116.

If a LEA uses Title II, Part A funds for personnel, all expenditures should: 1) be reasonable and necessary, 2) be distributed as a result of a Title II, Part A allowable, district identified need, 3) be tied to a specified and documented ‘deliverable’ event or activity, and 4) must be offered at a rate that can be documented, justified and is comparable to funding offered through the use of local funds and/or other Federal or state funding sources. LEAs must consider these requirements when developing policies that apply to stipends.

Per SBOE 160-3-3-.04, all LEAs must have a policy regarding the payment of stipends. Stipends may be awarded only if the following conditions exist:

(i) There is evidence that the knowledge, skills, practices, and dispositions gained from the professional learning activity are aligned to an approved individual plan, or a school or LEA initiative and/or product, and/or specific goals; and
(ii) There is evidence that the knowledge, skills, practices, and dispositions developed through participation in or facilitation of professional learning have been implemented/demonstrated in the classroom/work setting; and

(iii) Participation occurs beyond regular contract hours, days, or school year.

### 4.24 Personnel: Time and Effort

| 2 CFR §§200.300, 200.302(b)(5), 200.403(a&b), 200.403(g), 200.430(i); |
| 29 CFR §516.2-3 (Fair Labor Standards Act) |

Time and effort reporting is required when any part of an individual’s salary and wages is charged to a Federal program. Written internal controls are required to govern expenditures associated with time and effort. LEAs must keep careful documentation that proves time for which an individual is paid was spent in accordance with the purpose of the Title II, Part A grant.

**Time and Effort: Title II, Part A Salaried Positions**

Each LEA choosing to spend Title II, Part A funds on personnel are required to have a job description approved annually by the assigned Title II, Part A specialist prior to budget approval. Any job description that includes language asserting the employee may be required to complete other duties without clarifying that these duties will be Title II, Part A allowable may be required to complete a PAR because other duties may not be Title II, Part A allowable and may entail multiple cost objectives. Please consult Title II, Part A staff with any questions.

**Semi-annual Certifications** may be used for personnel who are fully funded by a particular Federal program or partially funded by the Federal program and whose total job is allowable under the Federal program (single cost objective). Individuals submit an assurance every six months (at a minimum) documenting the amount of time they worked for each particular Federal or non-Federal program.

**Personnel Activity Reports (PARs)**, completed monthly, are used for individuals who work less than 100% for a particular Federal program and whose total job responsibilities are not allowable under the Federal program (multiple cost objectives). Individuals included are substitute teachers and personnel performing work supplemental to contracted/regular hours such as mentors, recipients of stipends, and personnel providing professional learning.

All time and effort reporting must:

- Be completed and dated after the fact (after the work has been completed);
- Be signed by the employee or, in the absence of the employee, a supervisor having direct knowledge of the employee's work;
- Account for the total activity for which the employee is compensated and supports the distribution of the employee’s salary or wages among specific activities or cost objectives if the employee works for more than one federal award or a federal award and non-federal award;
- Coincide with one or more pay periods; and
- Be supported by documentation that indicates the charges are accurate, allowable, and properly allocated.

The charges for an employee’s salary/benefits may be supported by the employee’s daily schedule if:
• There is a fixed daily schedule for the employee;
• There is an indication on the schedule which portion of the day is worked for each funding source;
• The schedule is signed monthly by the employee and the employee’s supervisor;
• Questions about when daily schedules may be used in lieu of time logs should be addressed to the Title II, Part A Education Specialist assigned to the LEA.

Time and Effort: Additional Compensation (Supplements, Honorariums and Stipends)
All types of funding for personnel are subject to Time and Effort documentation. The LEA is responsible for maintaining documentation to show that all forms of payment received are for services or participation outside of normal work hours (contracted or otherwise). The appropriate time and effort documentation for these expenditures is the use of PARs. Please see the above section and Quick Guide located on the GaDOE Title II, Part A Resources webpage for additional guidance.

Time and Effort: Financial Incentives for Recruitment and Retention
Local education agencies budgeting and expending grant money on recruitment and retention financial incentives must meet the requirements of the statute (ESEA/NCLB - Sec. 2123. (a)(2)(A)(i-ii)...(a)(4)(B-D) and non-regulatory guidance (Title II, Part A Non-Regulatory Guidance E-1). Recipients of recruitment and retention financial incentives are not required to complete any work related to the grant in order to receive these incentives, thus this expenditure is not subject to Federal time and effort documentation requirements, but must be documented in compliance with Federal grant and local state guidance. A sample form for documenting this expenditure is available on the Title II, Part A website.

If districts choose to create and format their own documentation, it must, at a minimum, include: 1) budget line item, 2) documentation of allowability in the form of law and/ or non-regulatory guidance (ESEA/NCLB Sec. 2123 and Title II, Part A Non-Regulatory Guidance E-1), 3) a note explaining why this expenditure is exempt from Federal time and effort documentation requirements, and 4) justification for this expenditure to address local allowability.

Additional guidance on semi-annual certification, personnel activity reports and documenting financial incentives can be found on the Title II, Part A website: Recording Time and Effort for Staff Funded by Title II, Part A: Semi-Annual Certification vs Personnel Activity Report.

Time and Effort: Contracted Employees (Substitutes and Class-Size Reduction Teachers)
If a LEA pays a contractor to provide substitutes and/ or class size reduction teachers and the contractor directly pays the salary of the substitute and/ or class size reduction teacher, the LEA is not required to keep (but may keep) semi-annual certification (periodic certification) or personnel activity reports (PARs) for the employees. However, LEAs must still prove that the costs are allowable under law. For contracted substitutes, the LEA must link the substitute to the absent teacher and the activity to determine allowability. For contracted class size reduction teachers, LEAs must maintain the class size reduction worksheet, corresponding master schedule and evidence that the teacher meets State professional qualifications.
4.25 Recruitment and Retention: Recruiting Costs
2 CFR §§200.421, 200.463

Allowable Recruitment Costs include:

- “Help Wanted” advertising for qualified core academic content teachers and principals allowable by Title II, Part A
- Travel associated with recruitment
- The procurement of goods and services for Title II, Part A

In accordance with 2 CFR §200.421(e)(2)(i)&(3), unallowable advertising and public relations costs include: costs of displays and costs of promotional items and memorabilia, including gifts and souvenirs.

4.26 Recruitment and Retention: Financial Incentives
ESEA/NCLB Sec. 2123 (a)(2)(A)(i-ii) & (4)(B-D); Title II, Part A Non-Regulatory Guidance E-1

LEAs that experience difficulty recruiting and retaining qualified and highly effective core academic content teachers may choose to fund financial incentives. If a LEA chooses to fund financial incentives, the LEA should document 1) the need for the expenditure, 2) the criteria for selection and 3) the rationale for the amount awarded.

There is no Federal requirement for the use of a competitive process in selecting individual teachers for such awards. However, in keeping with the purpose of Title II, Part A and ESEA/NCLB as a whole, a LEA should consider developing and using a method for selection that is linked to a teacher’s or principal’s ability to demonstrate measurable increases in student academic achievement. The LEA might consider, however, having the teacher or principal sign a binding contractual agreement to repay all or part of the funds the LEA has provided in the event that the teacher or principal does not maintain employment in the LEA for a specified period of time.

Local education agencies budgeting and expending grant money on recruitment and retention financial incentives must meet the requirements of the statute and non-regulatory guidance. See Handbook Section Personnel: Time and Effort

4.27 Recruitment and Retention: Teacher Advancement Initiatives
ESEA/NCLB Sec. 2123(a)(8)

The statute provides that a LEA may use funds to carry out “teacher advancement initiatives that promote professional growth and emphasize multiple career paths such as paths to becoming a career teacher, mentor teacher, or exemplary teacher”. In some cases, the only real career advancement option for teachers is to become school principals or LEA administrators. This leaves fewer excellent, experienced teachers working directly with children in the classroom.

Multiple career paths for teachers provide professional opportunities to advance their careers without having to leave the classroom. For example, a LEA could establish a system whereby teachers could opt to pursue one of a variety of career paths, such as (1) a career teacher, staying in the classroom with traditional instructional duties, (2) a mentor teacher, staying in the classroom but taking on additional duties such as mentoring first-year teachers and receiving additional pay for these duties, or (3) an exemplary teacher, one who has a distinguished record of increasing student academic achievement, taking on additional duties of training other teachers to do the same, and receiving additional pay for these duties. LEAs are free to develop other approaches that fit their needs. The bottom line is to find ways to encourage teachers to advance their careers as teachers, rather than by becoming school principals or LEA administrators.
4.28 Recruitment and Retention: Staffing Services

Many LEAs make use of staffing services to meet their needs in securing qualified substitutes, paraprofessionals, and teachers for hard-to-staff core academic content positions. It is the LEA’s responsibility to ensure that any contracts or payments funded by Title II, Part A, in part or in whole, are allowable, reasonable and necessary and comply with all Federal regulations. For example, administrative fees are not considered a Title II, Part A allowable expense.

4.29 Recruitment and Retention: New Teacher Relocation

Paying out-of-area recruitment costs and moving expenses may be needed in order to recruit and relocate new teachers. There are circumstances under which the use of funds to pay out-of-area travel and relocation costs would be reasonable and necessary in order to recruit individuals that the LEA would want to hire to meet their teacher shortage needs. To the extent that out-of-area recruitment itself is reasonable and necessary, relocation costs may be paid as a stipend or financial incentive if, as with any cost the program would assume, they themselves are reasonable and necessary.

4.30 Professional Qualifications: GACE Testing

A LEA may use funds both to (1) pay the costs of state tests required of new and veteran teachers to determine whether they have core academic content competence, and (2) to assist them in meeting state certification requirements. Georgia LEAs are required to budget funds to support teachers and paraprofessionals in their efforts to become certified. However, Title II, Part A funds may not be used to pay required state certification fees. Title II, Part A funds may not be used to fund non-core academic teachers.

4.31 Professional Qualifications: Endorsements

Title II, Part A funds focus on providing professional learning opportunities that support teacher preparation for meeting the diverse needs of student learners. It is allowable to fund individual courses to the extent that they align with prioritized needs supported by source documentation. The primary focus should be professional learning rather than the acquisition of an endorsement. In addition, Title II, Part A funds may not be used to pay required state certification fees. Title II, Part A funds may not be used to fund non-core academic teachers.

4.32 Professional Qualifications: Alternative Certification Programs

Title II, Part A funds may be used to support core academic teachers in alternative certification programs in order to become fully certified. A LEA may use funds both to (1) pay the costs of courses required of new and veteran teachers to verify core academic content and/or pedagogical knowledge and skills, and (2) to assist them in meeting state certification requirements. However, Title II, Part A funds may not be used to pay required state certification fees.

4.33 Professional Qualifications: Advanced Degrees

Title II, Part A funds may be used to support core academic content teachers or principals in acquiring advanced degrees to the extent that doing so is consistent with the LEA’s needs assessment and local plan and as long as paying these costs the LEA would not be supplanting non-Federal funds that would otherwise be available to pay for them. The funds must enable the teacher
to provide more effective instruction in core academic subjects, or assist a principal to be a more effective manager and leader of efforts to improve student academic achievement.

Presumably, in choosing to use Title II, Part A funds, the LEA would want (1) the degree sought to be in the core academic content area that a teacher is or will be teaching (or in a field that a principal would need to study), (2) to have confidence that the core academic content courses to be taken complement state academic and student achievement standards, and (3) to know that any methods courses the teacher or principal take would help the teacher or principal become more effective in improving student academic achievement and, in the case of a current or aspiring principal, to become an effective instructional and school leader. The LEA might consider, however, having the teacher or principal sign a binding contractual agreement to repay all or part of the funds the LEA has provided in the event that the teacher or principal does not maintain employment in the LEA for a specified period of time.

**4.34 Professional Learning: ESEA/NCLB Definition**

**ESEA/NCLB Sec. 9101(34)**

The term “professional development” -

1. Includes activities that:
   a. Improve and increase teachers’ knowledge of the academic subjects the teachers teach, and enable teachers to become highly qualified;
   b. Are an integral part of broad schoolwide and LEA-wide educational improvement plans;
   c. Give teachers, principals, and administrators the knowledge and skills to provide students with the opportunity to meet challenging state academic content standards and student academic achievement standards;
   d. Improve classroom management skills;
   e. Are high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom and are not one-day or short-term workshops or conferences;
   f. Support the recruiting, hiring, and training of highly qualified teachers, including teachers who become highly qualified through state and local alternate routes to certification;
   g. Advance teacher understanding of effective instructional strategies that are:
      i. Based on scientifically based research (except that this subclause shall not apply to activities carried out under Part D of Title II); and
      ii. Strategies for improving student academic achievement or substantially increasing the knowledge and teaching skills of teachers; and
   h. Are aligned with and directly related to:
      i. State academic content standards, student academic achievement standards, and assessments; and
      ii. The curricula and programs tied to the standards described in subclause (a) [except that this subclause shall not apply to activities described in clauses (ii) and (iii) of ESEA/NCLB Sec. 2123(3)(B)];
   i. Are developed with extensive participation of teachers, principals, parents, and administrators of schools to be served under this Act;
   j. Are designed to give teachers of limited English proficient children, and other teachers and instructional staff, the knowledge and skills to provide instruction and appropriate language and academic support services to those children, including the appropriate use of curricula and assessments;
k. To the extent appropriate, provide training for teachers and principals in the use of technology so that technology and technology applications are effectively used in the classroom to improve teaching and learning in the curricula and core academic subjects in which the teachers teach;
l. As a whole, are regularly evaluated for their impact on increased teacher effectiveness and improved student academic achievement, with the findings of the evaluations used to improve the quality of professional development;
m. Provide instruction in methods of teaching children with special needs;
n. Include instruction in the use of data and assessments to inform and instruct classroom practice; and
o. Include instruction in ways that teachers, principals, pupil services personnel, and school administrators may work more effectively with parents; and

2. May include activities that:
a. Involve the forming of partnerships with institutions of higher education to establish school-based teacher training programs that provide prospective teachers and beginning teachers with an opportunity to work under the guidance of experienced teachers and college faculty;
b. Create programs to enable paraprofessionals (assisting teachers employed by a LEA receiving assistance under Part A of Title I) to obtain the education necessary for those paraprofessionals to become certified and licensed teachers; and
c. Provide follow-up training to teachers who have participated in activities described in subparagraph (A) or another clause of this subparagraph that is designed to ensure that the knowledge and skills learned by the teachers are implemented in the classroom.

4.35 Professional Learning: Scientifically-Based Research

ESEA/NCLB Sec. 9101; ESEA/ESSA Sec. 8002 (21)

The LEAs are required to connect all Title II, Part A funded activities to a review of scientifically-based research. “High quality professional development” must include activities “that advance teacher understanding of effective instructional strategies that are based on scientifically based research.”

In 2017-2018 ESEA/ESSA will move from requiring that professional learning be supported by scientifically-based research to providing professional learning that is evidence-based.

4.36 Professional Learning: Registration, Travel and Materials

2 CFR §200.432, 200.472, 200.474; ESEA/NCLB Sec. 2123(a), 9101(34)

The costs of training and education provided for employee development including associated travel and material expenses are allowable to the extent that costs are:

- Aligned with Title II, Part A prioritized needs.
- Necessary and reasonable for the performance of the grant and allowable under the Title II, Part A program.
- Prorated where content extends beyond what is allowable and aligns with prioritized needs.
- Consistent with LEA policies for travel and other Federal, State and Local laws, regulations and guidance.
- Appropriately supported by source documentation.
- Incurred on behalf of allowable participants: core academic content teachers, paraprofessionals, principals, assistant principals, and, in some cases, superintendents.**

**For circumstances beyond what is described above, please contact your Title II, Part A Specialist.
LEAs may use Title II, Part A funds to support Title II, Part A allowable personnel attending professional learning, but may not be used to pay for that personnel to present at the professional learning activity.

**4.37 Professional Learning: On-Site PL and Materials**


When hosting professional learning activities using Title II, Part A funds, LEAs must exercise discretion and judgment in ensuring that professional learning costs are appropriate, necessary, and managed in a manner that minimize costs to the Title II, Part A grant. The costs of hosting professional learning for employee development may include:

- Rental of facilities
  - LEAs should limit facility rental to spaces necessary to accommodate the total number of participants.
  - In general, LEAs are encouraged to have a rationale for selecting sites and to select sites that are located within reasonable distance of the LEA so as not to incur unnecessary additional costs.
- Speaker’s fees and other necessary associated costs
  - LEAs should adhere to local procurement procedures. When seeking a consultant or speaker, based on cost, LEAs may be required to seek competitive bids. In developing a Request for Proposals (RFP) and when writing requests for quotes, LEAs are encouraged to include detailed requirements for presentation topics, services to be provided, etc. It may helpful to list the name of a particular vendor and request the equivalent. *Example: Topic – Poverty, Speaker for 500 Teachers, Corresponding Literature for Book Study, Small Group Discussion with Author for LEA Administrators – Like Ruby Payne or the Equivalent. See Handbook Section on Procurement*
- Materials to support on-site professional learning
  - See Handbook Section on Supplies
- Stipends
  - See Handbook Section on Stipends
- Food
  - As per the USDE FAQs (2013) and 2014 Dear Colleague Letter, USDE takes the following position on providing food for conferences and meetings. “Generally, there is a very high burden of proof to show that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. When a grantee is hosting a meeting, the grantee should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages, and snacks. In addition, when planning a meeting, grantees may want to consider a location in which participants have easy access to food and beverages.

  While these determinations will be made on a case-by-case basis, and there may be some circumstances where the costs would be permissible, it is likely that those circumstances would be rare. Grantees, therefore, will have to make a compelling case that the unique circumstances they have identified would justify these costs as reasonable and necessary.”

- Substitutes for core academic content teachers attending Title II, Part A allowable professional learning
The LEA is responsible for linking substitute to date, school, teacher and the professional development activity in which the teacher participated. Substitutes are subject to time and effort reporting. See Handbook Section on Time and Effort

All of the above costs should be

- Aligned with Title II, Part A prioritized needs.
- Necessary and reasonable for the performance of the grant and allowable under the Title II, Part A program.
- Prorated where content and/or participants extend beyond what is allowable and aligns with prioritized needs. Allowable participants include: core academic content teachers, paraprofessionals, principals, assistant principals, and, in some cases, superintendents.
- Adequately supported by source documentation.

Consider the following questions when budgeting for Professional Learning:

- How does the agenda/scope of service support the goals of the Title II, Part A program?
- Is the total cost funded by Title II, Part A or are other funds being used as well?
- Could equitable training/service be provided for less cost?
- What is the plan for sustainability/future costs to support the event/service?
- Does the event/service align with the LEA’s prioritized needs and/or selected equity interventions?
- How will the effectiveness of the event/service be determined (included in the Title II, Part A Effectiveness Plan)?
- How and why will the LEA select the delivery model to be used for this professional learning? Is the selected delivery model the most effective for the targeted audience?
- Who, in terms of position, in the LEA will be participating in/attending the event/service?
- What knowledge and/or skills are the participants expected to demonstrate as a result of participating in the professional learning?
- What is the research base for this professional learning?
- Will the location and number of participants create a negative impression during challenging economic times?

### 4.38 Professional Learning: Contracts and Partnerships

*ESEA/NCLB Sec. 2123(a); 2 CFR §§200.318(b), 200.320(b-c)*

LEAs are authorized to partner with both for-profit and non-profit entities to carry out authorized activities through grants or contracts with those entities. LEA’s are encouraged to form partnerships with institutions of higher education and other educational and community agencies to carry out their local plans.

Source Documentation for contracts funded (in whole or part) by Title II, Part A must include

- A detailed purchase order and/or invoice and check
- A contract/agreement with deliverables, timeline, etc.
- Documentation of compliance with Federal purchasing requirements
  - For purchases whose aggregate FY cost is over $3,500 a copy of the 2 or more price/rate quotations
For purchases whose aggregate FY cost is over $150,000 a copy of formal advertising for bid or copy of competitive proposals

- A copy of any deliverables that should have been received prior to payment. This may include sign-in sheets, training materials, etc. Sign-In sheets should include staff positions/grade/content
- Proof of Title II, Part A Coordinator authorization

All documentation should be sufficient to determine that expenditures are allowable under applicable laws and regulations, reasonable and necessary, supplemental to non-Federal funds, and align with the Title II, Part A budget. Payment (in whole or in part) should not be authorized until corresponding services are complete and documentation is verified. LEAs must maintain oversight to ensure that contractors perform in accordance with the terms, conditions and specifications of their contracts or purchase orders. See Handbook Section on Period of Performance: Obligations

### 4.39 Professional Learning: Supplies

2 CFR §§200.94, 200.453; Title II, Part A Non-Regulatory Guidance E-10

Title II, Part A funds may be used to purchase professional development supplies and instructional materials only if the expenditures, like any costs paid for by Federal program funds, are reasonable and necessary to carry out these activities. Supplies should be purchased within the period of performance of the fiscal year to support only those activities that occur during the corresponding fiscal year. Funds may be used to purchase materials and supplies used in professional development activities, including the materials that a teacher will need in order to apply the professional development in a classroom setting. Title II, Part A may not be used to purchase classroom supplies or materials for students.

- Example: Professional learning books MAY be purchased to support a book study on a topic that aligns with a LEA’s prioritized needs. Books MAY NOT be purchased to stock a professional learning reference library.
- Example: Fifteen graphing calculators MAY be purchased for a group of 15 teachers to use during professional learning on high school math content and instructional strategies. Classroom sets of the calculators MAY NOT be purchased for the teachers to implement these strategies.

### 4.40 Professional Learning: Equipment

See Handbook Sections on Equipment and Inventory.

### 4.41 Professional Learning: Memberships, Subscriptions and Professional Activity Costs

2 CFR §§200.454, 200.472

The cost of a LEA or school membership with professional organizations and/ or subscriptions to professional periodicals may be allowable. Please note this does not extend to individual LEA personnel. It is the responsibility of the LEA to determine the most effective approach for purchasing professional organization memberships.

### 4.42 Professional Learning: Training for Paraprofessionals

ESEA/NCLB Sec. 2123, Use of Funds #3
The law allows LEAs to use Title II, Part A funds to provide professional development activities “that improve the knowledge of core academic content teachers and principals, and, in appropriate cases, paraprofessionals”. In general, paraprofessionals may participate in professional learning that builds their capacity to support teachers and students (especially students with special learning needs) in content area knowledge and effective instructional and behavioral strategies, methods, and skills. For a more detailed description, please reference ESEA/NCLB, Title II, Part A, Sec. 2123 LEA Use of Funds #3.

4.43 Professional Learning: Training for Teachers and Paraprofessionals on Parent Involvement

ESEA/NCLB Sec. 2123, Use of Funds #3

Title II, Part A funds may be used to enhance the involvement of parents through the training of teachers and paraprofessionals on effective strategies and methods. Parent involvement is best encouraged through regular, two-way, and meaningful communication about student learning and other school activities. Effective strategies may include (1) promoting the understanding that parents are true partners in their children’s education and communicating the need for parents to help their children succeed in school; and (2) providing parents with specific suggestions, on an ongoing basis, and/or training about ways to encourage learning at home and ways to be actively involved in their child’s education at school.
Section 5
Private Schools

Under the Elementary and Secondary Education Act (ESEA), as reauthorized by the No Child Left Behind Act (NCLB), there are a number of programs that require the equitable participation of private school students and teachers. One program is Title II, Part A – Improving Teacher Quality State Grants. Under the Title II, Part A program, private school teachers, principals, and other educational personnel are eligible to participate to the extent that the LEA uses funds to provide for professional development for teachers and other allowable school personnel. The following section provides information to LEAs about private school participation and resources that are available in determining appropriate use of Title II, Part A funds.
5.1 Private Schools: Provision of Equitable Services

Under the *Title II, Part A* program, private school teachers, principals, and assistant principals are eligible to participate to the extent that the LEA uses funds to provide for professional development for teachers and other school personnel. Funds awarded to SEAs and LEAs under *Title II, Part A* are subject to the uniform provisions of ESEA/NCLB Sec. 9501 (*Participation by Private School Children and Teachers*). The statute requires LEAs to provide private school children, their teachers, and other educational personnel with educational services on an equitable basis and in a timely manner. (*Title II, Part A Non-Regulatory Guidance*, Revised October 5, 2006). Private schools participating in the shared services supported with Title II, Part A funds of any LEA must provide the collaborating public LEA with W-9 information upon request. Private Schools must hold non-profit status in order to be eligible to receive funds. For additional information about participation of private schools, see ESEA/NCLB, Sec. 9501(a).

5.2 Private Schools: Notification Requirements

- The Elementary and Secondary Education Act requires that public LEAs contact appropriate officials of all private schools within the geographic boundaries of the LEA annually to determine if they want their teachers to participate in the Improving Teacher Quality State Grants program, regardless of whether or not those officials have recently indicated any interest in program participation. A current list of Private Schools is housed on the GaDOE’s website and will be used during monitoring to check for compliance. This website can be accessed at [http://www.doe.k12.ga.us/External-Affairs-and-Policy/AskDOE/Pages/Schools-and-Districts.aspx](http://www.doe.k12.ga.us/External-Affairs-and-Policy/AskDOE/Pages/Schools-and-Districts.aspx). Letters should be for involvement in the next fiscal year, but should be mailed in the current fiscal year in order to allow the participants the opportunity to take part in the annual needs assessment before the allocations are made available. The LEA must include private schools that wish to participate in the Title II, Part A program in the assessment, planning, and participation of professional learning activities. Visit the Title II, Part A Website for sample letters.

- Title II, Part A coordinators should work in collaboration with other appropriate Federal program coordinators in their LEA in sending invitations to private schools for a consultation meeting regarding their participation in the Title II, Part A program as well as other Federal programs. Mail receipts should be kept and available for each program served.
• Notification, at a minimum, should include: LEA name, program for which the private school is being invited to participate, the current date, the fiscal year for which the private school is being invited to participate, the name and contact information of someone in the LEA that can assist the private school.

5.3 Private Schools: Consultation and Planning

ESEA/NCLB Sec. 9501(3-4)

To ensure timely and meaningful consultation, a LEA must consult with appropriate private school officials during the design and development of the proposed programs. It is important that attention be given to the timing of the consultation so that decisions that affect the opportunities of eligible private school teachers to participate in Title II, Part A program activities are made only after discussions have taken place. The quality of the consultative process will likely have an effect on the quality of services to private school.

To meet its general record-keeping responsibility, a LEA should document that: (a) representatives of private schools were informed of the availability of Improving Teacher Quality State Grants services; (b) the needs of private and public school teachers were identified as part of a LEA-wide needs assessment; (c) private school officials were consulted and provided an opportunity for input into the planning of the LEA’s program activities; and (d) the LEA approved a budget that permitted equitable participation for private schools.

As part of the CLIP submission process, LEAs sign off on assurances that they will comply with ESEA/NCLB Sec. 9501 (regarding participation by private school children and teachers). LEAs must consult with appropriate private school officials during the design, development, and implementation of the professional development program on topics including:

• “How the children’s needs will be identified’’ and how students’ needs inform the professional learning needs of teachers and principals;

• “What services will be offered’’;

• “How, where, and by whom the services will be provided’’;

• “How the services will be assessed and how the results of the assessment will be used to improve those services’’ – LEAs are responsible for ensuring private schools measure effectiveness of funded activities;

• “The size and scope of the equitable services to be provided to …eligible teachers… and the amount of funds available for those services’’; and

• How and when the LEA will make decisions about the delivery of services, including a thorough consideration and analysis of the views of the private school officials on the provision of contract services through potential third-party providers.

GaDOE Title II, Part A program staff also encourage LEAs to consult with private school officials and provide guidance and/ or copies of applicable policies/ written procedures, such as travel, stipends, and source documentation required to determine allowability. ESEA/ NCLB requires LEAs to provide services to private school teachers and principals that are equitable to those provided to teachers and principals in the LEA. In addition, 2 CFR §200.403 requires costs to be uniformly consistent with policies and procedures.
5.4 Private Schools: Determining Allocations

Title IX requirements apply to the Title II, Part A, Teacher and Principal Training and Recruiting Fund to the extent that LEAs use the funds for professional development. For purposes of determining the amount of Title II, Part A formula grant funds that a LEA must make available for equitable services to private school teachers and other education personnel, the statute requires that a LEA spend at least as much for professional development under Title II, Part A as it did in FY2001 under the former Eisenhower Professional Development and Class Size Reduction programs. (See Title IX, Sec. 9501(b)(3)(B).) LEAs must provide private school officials with the amount of funding available for services for private school students and teachers under the various ESEA/NCLB programs requiring equitable participation. Private school students who are enrolled in nonprofit private elementary and secondary schools, including those in religiously affiliated schools, located in the LEA generally are eligible to receive services.

Under ESEA/NCLB Sec. 9501(d), the LEA must always maintain control of the program funds as well as title to all materials, equipment, and property purchased with Federal funds. A LEA may reserve off the top of a program’s total allocation the following: 1) Administrative costs (which may be subject to statutory caps) for administering the program for public and private school students and teachers; 2) Indirect costs associated with administering the program for public and private school students and teachers; 3) Other allowable administrative costs as defined in the statute (e.g., for LEA-wide programs); and 4) a third party provider’s fee or profit.

### FORMULA TO DETERMINE AMOUNT FOR TITLE II, PART A EQUITABLE EXPENDITURES

<table>
<thead>
<tr>
<th>A. Number of Students</th>
<th>Example A</th>
<th>Example B</th>
</tr>
</thead>
<tbody>
<tr>
<td>A1: LEA Enrollment</td>
<td>960</td>
<td>960</td>
</tr>
<tr>
<td>A2: Participating Private School Enrollment*</td>
<td>40</td>
<td>40</td>
</tr>
<tr>
<td>A3: Total Enrollment = A1 + A2</td>
<td>1,000</td>
<td>1,000</td>
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<table>
<thead>
<tr>
<th>B. Title II, Part A Allocation To Be Used for Prof. Learning</th>
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</thead>
<tbody>
<tr>
<td>B1: LEA Allocation</td>
<td>$150,000</td>
</tr>
<tr>
<td>B2: Indirect Costs and Administration (for public and private programs) + Class Size Reduction + Recruitment Activities</td>
<td>$130,000</td>
</tr>
<tr>
<td>B3: Amount LEA is Using for Prof. Learning = B1 – B2</td>
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<table>
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<tr>
<th>C. Hold Harmless Amount</th>
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<tbody>
<tr>
<td>C1: Based on FY2001 Eisenhower Professional Development + Federal Class Size Reduction used for Prof. Learning</td>
<td>$40,000</td>
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<table>
<thead>
<tr>
<th>D. Per Pupil Rate</th>
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<tbody>
<tr>
<td>D1: Use either B3 or C1, whichever is larger, and divide by A3</td>
<td>$40,000</td>
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<table>
<thead>
<tr>
<th>E. Equitable Services</th>
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</thead>
<tbody>
<tr>
<td>E1: Amount LEA must reserve for equitable services for participating private schools = A2 x D1</td>
<td>$1,600</td>
</tr>
</tbody>
</table>

Note: This is not an official U.S. Department of Education document. The form is for sample purposes only and should not be considered as a required document when administering the Title II, Part A program.

*The residency of the private school student is not a factor in determining the number of children enrolled in the participating private school.

5.5 Private Schools: Hold-Harmless Provision

ESEA/NCLB Sec. 9501

The “hold-harmless” provision of Title IX, Sec. 9501 refers to funds for professional development activities that the LEA must make available for the benefit of private school teachers and principals,
and provides that funds that the LEA sets aside for professional development for private school
teachers and principals must be equal to that set aside for public school teachers and principals on
a per-pupil basis. For purposes of determining the amount of funds that a LEA must make available
for equitable services to private school teachers and principals, the LEA uses at least (1) the amount
funds it is spending that year for professional development, or (2) the total amount it spent for
professional development during the fiscal year 2001 under the former Eisenhower Professional
Development program and the former Class Size Reduction program. This provision governs the
amount of funds the LEA must use for services to private school teachers and principals. It does
not compel a LEA to spend any of its funds on professional development for public school teachers
and principals. The LEA makes this determination based on the local needs assessment.

Any time within a fiscal year, there is a change in the Total Grant Award or an increase in the
amount of funds the LEA budgets for professional learning, the LEA must recalculate the funds for
equitable services for participating private schools. The LEA must notify in writing each
participating private school of its revised equitable share allocation and request a revised budget
from each participating private school. A copy of the Title II, Part A Private School Equitable
Services Worksheet must be uploaded with each amendment to document the allocations the LEA
is providing to private schools.

### 5.6 Private Schools: Carryover

**Title IX, Part E Non-Regulatory Guidance F-9**

In general, if a LEA provided equitable services for private school students in any given year, any
carryover funds for services to private school students would be considered additional funds for
that program for public and private school students in the subsequent year. Those funds then would
be used, along with any other carryover funds, for both public and private school students on an
equitable basis. This situation might occur, for example, if private school students and teachers did
not fully participate in the Federal education program (e.g., private school teachers opted out of a
proposed professional development activity), even though an equitable program was planned and
offered for those students and teachers.

However, if the LEA did not provide equitable services for private school students in a given year
and, as a result, there are funds remaining that should have been expended for private school
students, the LEA should use those carryover funds for private school students in the subsequent
year. Those funds would be in addition to the funds that the LEA uses for private school students
out of the subsequent year’s allocation. This situation might occur, for example, if the LEA failed
to notify or consult with private school officials about the availability of the Federal program, or if
there was a delay in the implementation of an equitable program.

**Examples of Carryover Scenarios:**

1. If ALL private schools were given the opportunity to participate AND the private schools
   who opted in and received allocations completely expended those allocations, then –no- the
   LEA does not need to consider them if the carryover is strictly from the *LEAs portion* of the
   allocation.

2. If ALL private schools were given the opportunity to participate AND the private schools
   who opted in and received allocations DID NOT completely expend those allocations, then
   –yes- the LEA needs to consider them in the *private school portion* of carryover, though the
   LEA is now eligible to use the remaining amount for both public and private school students
on an equitable basis. This would require including private schools in budgeting carryover funds from the previous year.

3. If the LEA DID NOT notify ALL private schools, then they must invite the private schools who were not originally notified to participate and allocate the proportion of funds from the original allocation that should have been spent in the first place whether that portion takes up part or all of the LEA’s portion of carryover. This allocation provided out of the LEA’s carryover must be in addition to the allocation issued to a participating private school for the current fiscal year.

<table>
<thead>
<tr>
<th>LEA Allocation</th>
<th>Private School Allocation</th>
<th>LEA Allocation Less Private School Allocation</th>
<th>LEA Expenditures</th>
<th>Private School Expenditures</th>
<th>LEA Carryover</th>
<th>Private School Carryover</th>
</tr>
</thead>
<tbody>
<tr>
<td>$10,000</td>
<td>$500</td>
<td>$9,500</td>
<td>$9,500</td>
<td>$500</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

If ABC LEA invites all its private schools, and the LEA and participating private schools expend all allocations, then neither the LEA nor the private schools will receive carryover.

<table>
<thead>
<tr>
<th>LEA Allocation</th>
<th>Private School Allocation</th>
<th>LEA Allocation Less Private School Allocation</th>
<th>LEA Expenditures</th>
<th>Private School Expenditures</th>
<th>LEA Carryover</th>
<th>Private School Carryover</th>
</tr>
</thead>
<tbody>
<tr>
<td>$10,000</td>
<td>$500</td>
<td>$9,500</td>
<td>$8,000</td>
<td>$500</td>
<td>$1,500</td>
<td>$0</td>
</tr>
</tbody>
</table>

If ABC LEA invites all its private schools, and the private schools that opt in expend all their allocation, then they will not receive carryover, even if ABC district has carryover.

<table>
<thead>
<tr>
<th>LEA Allocation</th>
<th>Private School Allocation</th>
<th>LEA Allocation Less Private School Allocation</th>
<th>LEA Expenditures</th>
<th>Private School Expenditures</th>
<th>LEA Carryover</th>
<th>Private School Carryover</th>
</tr>
</thead>
<tbody>
<tr>
<td>$10,000</td>
<td>$500</td>
<td>$9,500</td>
<td>$9,500</td>
<td>$250</td>
<td>$0 (May use PS)</td>
<td>$250</td>
</tr>
</tbody>
</table>

If ABC LEA invites all its private schools, and the LEA and the private schools have carryover, the LEA must consider the private school’s carryover portion, however, the LEA may now use the remaining amount on public and private schools.

<table>
<thead>
<tr>
<th>LEA Allocation</th>
<th>Private School Allocation</th>
<th>LEA Allocation Less Private School Allocation</th>
<th>LEA Expenditures</th>
<th>Private School Expenditures</th>
<th>LEA Carryover</th>
<th>Private School Carryover</th>
</tr>
</thead>
<tbody>
<tr>
<td>$10,000</td>
<td>$500</td>
<td>$9,500</td>
<td>$8,000</td>
<td>$250</td>
<td>$1,500 (May use PS)</td>
<td>$250</td>
</tr>
</tbody>
</table>

If ABC LEA does not invite all private schools, and the LEA has carryover, the LEA must provide opportunity for those private schools to participate, and, if they opt in, allocate from the LEA carryover the amount the private school should have originally received.

<table>
<thead>
<tr>
<th>LEA Allocation</th>
<th>Private School Allocation</th>
<th>LEA Allocation Less Private School Allocation</th>
<th>LEA Expenditures</th>
<th>Private School Expenditures</th>
<th>LEA Carryover</th>
<th>Private School Carryover</th>
</tr>
</thead>
<tbody>
<tr>
<td>$10,000</td>
<td>$0 ($500)</td>
<td>$10,000</td>
<td>$8,000</td>
<td>$0</td>
<td>$1,500</td>
<td>$500</td>
</tr>
</tbody>
</table>

5.7 Private Schools: Eligible Activities

*Title II, Part A Non-Regulatory Guidance; 34 CFR §76.52*

As with any activity that the LEA carries out for public school teachers, activities supported with *Title II, Part A* funds that benefit private school teachers must meet the requirements of the statute. For example, activities to be carried out for private school personnel must be based on a review of scientifically-based research and must be expected to improve student academic achievement.

Professional development activities may include:

- Improving the knowledge of teachers, principals, and other educational personnel in one or more of the core academic subjects and in effective instructional teaching strategies, methods, and skills;
- Training in effectively integrating technology into curricula and instruction;
- Training in how to teach students with different needs, including students with disabilities or limited English proficiency, and gifted and talented students;
- Training in methods of improving student behavior, identifying early and appropriate interventions, and involving parents more effectively in their children’s education;
- Leadership development and management training to improve the quality of principals and superintendents; and
• Training in the use of data and assessments to improve instruction and student outcomes.

To the extent that a teacher’s attendance at a conference sponsored or conducted by a faith-based organization is part of a sustained and comprehensive secular professional development plan, Title II, Part A funds may be expended to pay for the portion of the costs of the conference that, as determined by the LEA, represent the secular professional development in which the teacher participated. By law, use of Federal funds to support religion is prohibited.

5.8 Private Schools: Reimbursement

LEAs are not allowed to reimburse to private schools directly for professional learning costs. Only the LEA may obligate and expend federal funds on behalf of private school teachers and principals. The LEA must purchase materials or procure services on behalf of the private school. A LEA may use federal funds to reimburse an individual private school teacher or principal for professional development that the LEA has pre-approved and that meets the reasonable and necessary cost principles of 2 CFR Part 200.

LEAs must not reimburse for unallowable activities.

5.9 Private Schools: Record Keeping

While a LEA may not overburden a private school in paperwork, as the agency fiscally responsible for the management of funds, a LEA may require the private school to submit enough documentation to determine that the expense is allowable, reasonable, defensible and necessary in accordance with any and all Federal requirements. This may include, but is not limited to, a participant’s name and position, an agenda and receipts.

LEAs who serve private schools expend funds on behalf of the private school, thus all private school expenditures must also comply with LEA procurement procedures. LEAs entering into contracts on behalf of private schools must adhere to LEA procedures and have the primary responsibility for maintaining documentation.

5.10 Private Schools: FAQs

ESEA/ NCLB Sec. 9501; Title II, Part A & Title IX, Part E Non-Regulatory Guidance; 34 CFR Part 76

Who has control of the program funds?

The LEA must always maintain control of the program funds as well as title to all materials, equipment, and property purchased with Federal funds. Given the fiscal responsible of the district, to the extent that it does not put undue burden on the private school(s) the LEA should require source documentation for expenditures sufficient to determine that all activities are allowable, reasonable and necessary and that fund recipients are eligible under Title II, Part A guidance. By law, LEAs must abide by applicable statutes, regulations, and shall use Federal funds in accordance with those statutes, regulations, plan and applications including supervision, fiscal control and fund accounting procedures. Use of funds for religion is prohibited.

Title II, Part A Non-Regulatory Guidance G-12
May Title II, Part A funds be used to pay for a private school teacher’s attendance at a professional conference sponsored or conducted by a faith-based organization?
Yes. To the extent that the conference is part of a sustained and comprehensive secular professional development plan for the teacher, then Title II, Part A funds may be expended to pay for the portion of the costs of the conference that, as determined by the LEA, represent the secular professional development in which the teacher participated. In this case, the LEA would pay or reimburse the teacher for attendance at the conference.

Note: If the conference contains both secular and non-secular events, the attending teacher must provide the LEA with information clearly delineating secular and non-secular activities prior to attending the conference. The LEA will determine the percentage of the conference representing secular professional development in which the teacher participated. The LEA should consider all expenses related to attending the conference (airplane ticket, hotel registration, etc.) to determine the amount to reimburse the teacher for attending at the conference. 34 CFR §76.532(a)(1-2)

Title IX, Part E Non-Regulatory Guidance F-6
May a LEA reimburse a private school for materials it has purchased or services it has procured to implement an ESEA/NCLB program?
No. Only the LEA may obligate and expend Federal funds on behalf of private school students and teachers. Thus, the LEA must purchase materials or procure services on behalf of the private school students and teachers. However, a LEA may use Federal funds to reimburse an individual private school teacher, administrator, or other educational personnel for professional development that the LEA has pre-approved and that meets the reasonable and necessary cost principles of the Office of Management and Budget (OMB) 2 CFR Part 200.

Title IX, Part E Non-Regulatory F-7
May a LEA use funds to provide stipends to private school teachers?
Yes. As with any other costs, the use of funds for stipends must be allowable under the program and reasonable and necessary for the proper operation of the grant program. For example, if a professional development program is conducted during after-school hours or during the summer, stipends may be needed to compensate teachers for their participation outside their regular employment hours. In addition, stipends for private school teachers must be available on the same basis as for public school teachers, and the stipends must be paid to private school teachers for their own use. However, the stipends must not be paid to the private school or be for the benefit of the private school.