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

FY20 GCEL Conference
Title II, Part A Education Specialists
March 2020

The contents of this presentation were developed under a grant from the U.S. Department of Education. However, those contents do not necessarily represent the policy of the U.S. Department of Education, and you should not assume endorsement.
We can help you!

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ESSA Section 2001 – Purpose

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What is the purpose of Title II, Part A?

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

(1) increase student achievement consistent with the challenging State academic standards;

(2) improve the quality and effectiveness of teachers, principals, and other school leaders;

(3) increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools;

(4) provide low-income and minority students greater access to effective teachers, principals, and other school leaders.
Supplement Not Supplant
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Funds made available under Title II, Part A shall be used to supplement and not supplant non-federal funds that would otherwise be used for activities authorized under Title II, Part A (Sec. 2301)

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

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

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

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Period of Performance (27 months)
  • Original - July 1 - September 30 (15 months)
  • Carryover – October 1 - September 30 (12 months)

How Period of Performance Influences Purchasing:
  • Generally, purchases should occur and be paid for within the original 15 months. Purchases should benefit the current fiscal year.
  • Multi-year contracts/ licenses that extend beyond the period of performance are allowable. Multi-year contracts may be more cost effective. However, the contract should include language clarifying “pending funding availability”. It is a best practice to align contracts/ licenses to period of performance.
Agenda
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• Section I: Title II, Part A Budget Resources
• Section II: Completing The Grant Budget
• Section III: Budget Tips and Reminders
• Section IV: Title II, Part A Budget Updates
SECTION I:
Title II, Part A
Budget Resources
Budget Resources
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Budget Resources
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Title II, Part A Supporting Effective Instruction Grant

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

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

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

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Refer to Title II, Part A Handbook
### Evidence-Based

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

<table>
<thead>
<tr>
<th>Section 8101 [20 USC 7801] Definitions: (21) EVIDENCE-BASED.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>(A) IN GENERAL.</strong> —Except as provided in subparagraph (B), the term “evidence-based”, when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that—</td>
</tr>
<tr>
<td>(i) demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on—</td>
</tr>
<tr>
<td>(I) strong evidence from at least 1 well-designed and well-implemented experimental study; or</td>
</tr>
<tr>
<td>(II) moderate evidence from multiple experimental studies; or</td>
</tr>
<tr>
<td>(III) promising evidence from well-designed and well-implemented quasi-experimental study with statistical control of extraneous variables.</td>
</tr>
<tr>
<td>(ii) demonstrates a rational basis for the effectiveness of such activity, strategy, or intervention, such as evidence from large-scale studies of student performance and outcomes; and</td>
</tr>
<tr>
<td>(II) 11 includes ongoing efforts to examine the effects of such activity, strategy, or intervention.</td>
</tr>
<tr>
<td><strong>(B) DEFINITION FOR SPECIFIC ACTIVITIES FUNDED UNDER THIS ACT.</strong> —When used with respect to interventions or improvement activities or strategies funded under section 1003, the term “evidence-based” means a State, local educational agency, or school activity, strategy, or intervention that meets the requirements of subclause (I), (II), or (III) of subparagraph (A)(i).</td>
</tr>
</tbody>
</table>

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

**Sec 2103(b)(3)(D&E)**
Evidence-Based Resources

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

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

Websites:
What Works Clearinghouse
http://ies.ed.gov/ncee/wwc
Evidence for ESSA
http://www.evidenceforessa.org/
Best Evidence Encyclopedia
http://www.bestevidence.org/
Time and Effort Quick Guide

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**SAMPLE SCENARIOS TO ASSIST TITLE II, PART A LEA COORDINATORS IN DETERMINING DOCUMENTATION FOR PERSONNEL EXPENSES**

<table>
<thead>
<tr>
<th>Personnel Expenditure</th>
<th>Funding Source(s)</th>
<th>Job Description</th>
<th>Required Time and Effort Documentation</th>
<th>Required Allowability Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salary/Additional Compensation for Teacher or School Leader Mentor (2213 - 199)</td>
<td>Fully or Partially Funded by Title II, Part A and other funding source(s)</td>
<td>Teacher Mentor or Leader Mentor provides mentoring to teacher recipient or assistant principal/principal (single cost objective).</td>
<td>Periodic Certification identifying the mentor name, job title (teacher/mentor, principal/mentor, teacher leader mentor). If teacher, must include position, site/school, funding source(s), and authorizing signature.</td>
<td>Allowability Documentation: Document that connects the name of the mentor, name of mentee, and amount of support. If teacher is included, must include position/site/school, amount of support for mentoring services. Job description must be attached in ConApp. Procedures for awarding salary/allowability compensation. Funds may be used to compensate teacher leader mentors and leader mentors for increased leadership roles and responsibilities. ESSA 2103 (b)(3)(B)</td>
</tr>
</tbody>
</table>

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**Important Definitions**

(Excerpted from 200.12) To ensure the following are complete to verify the work performed:

- Periodic/Seminar must be completed to verify the work performed.
- Personnel Activity Record must be completed to support the employee's salary and wages.
- Single Cost Objective only if employee is working full, from each of the following:
- Multiple Cost Objectives if employees are working part-time.

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**Title II, Part A Time and Effort Quick Guide**

**Documenting Personnel Expenses**

**Funded by Title II, Part A**

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**Notes:**

- This quick guide is not intended to replace the Title II, Part A LEA Handbook or Federal Law or Guidance.
- The guidance below is intended to assist LEAs in appropriately documenting personnel expenses for individuals for whom any part of their salary and wages is charged to Title II, Part A. Charges to Title II, Part A for salaries and wages must be based on records that accurately reflect the work performed. These records must:
  - Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated.
  - Be incorporated into the official records of the non-Federal entity.
  - Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities.
  - Support the distribution of the employee's time and effort between Title II and the non-Federal entity.

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**Disclaimer:**

This information is intended to assist local education agencies in meeting federal requirements for Title II, Part A. It is not intended to replace the Title II, Part A LEA Handbook or Federal Law or Guidance. This document is not a legal document and should not be used as such. It is subject to change and does not represent official policy.

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**Contact Information:**

Georgia Department of Education

Richard Woods, Georgia’s School Superintendent | Georgia Department of Education | Educating Georgia’s Future
Drawdown of Federal Funds §200.305(b)

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What is your role in requesting grant drawdowns?

- Review and revise LEA internal controls that reflect actual practice based on guidance
- Review and make appropriate adjustments before authorizing grant drawdowns prior to the LEA finance officer requesting funds
- Ensure that funds drawn down align with the LEA’s general ledger
- LEAs should not draw down more than expended
SECTION II: Completing The Title II, Part A Grant Budget
PRIORITIZING FUNDS – 2102 (b)(2)(C)

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

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

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

The LEA must comply with providing equitable services to private schools located within the LEA’s geographic boundaries for Title II, Part A.
Prioritizing Funds
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Prioritize funds to:
- Address needs of the students, teachers and principals
- Select interventions/strategies that meet the purpose of the grant
  - Increase student achievement AND improve teacher/principal quality and effectiveness AND increase the # who are effective
  - AND provide low income and minority students greater access to effective teachers/principals
- Select interventions/strategies that are allowable under the grant

Prioritize funds by:
- Allocating to LEA schools
- Allocating to CSI/TSI schools
- CSI/TSI Link
Attachment: Prioritizing Funds to School Level

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

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

<table>
<thead>
<tr>
<th>LEA Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount of Title II, Part A Funds Reser</td>
</tr>
<tr>
<td>Brief rationale for how the LEA allocated Title II, Part A funds</td>
</tr>
<tr>
<td>LEA School Name</td>
</tr>
</tbody>
</table>
## FY20 Title II, Part A Equitable Services Worksheet

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

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

<table>
<thead>
<tr>
<th>LEA Name</th>
<th>LEA Enrollment</th>
<th>Private School Enrollment</th>
<th>LEA and Private School Enrollment</th>
<th>1(^{\text{st}}) Original Allocation</th>
<th>Admin Reservation</th>
<th>% of Allocation Reserved</th>
<th>Remaining Allocation</th>
<th>PPA</th>
<th>Total allocated to Private school</th>
<th>Remaining for LEA</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td>$0</td>
</tr>
</tbody>
</table>

1. \(^{\text{st}}\) Original Allocation is the initial grant award from the SEA.

### ESSA: Explanation must be attached if LEA makes carryover available to private schools.
Transferring Funds
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Transferring funds is a LEA decision, but LEAs must notify GaDOE by indicating in either the Online CLIP or S-CLIP. Benefits of transferring funds include:

• When transferring funds, the LEA chooses the amount to transfer, either 100% or a lesser amount allowing the LEA to fund LEA initiatives

• Transferring funds can be maximized and have increased availability by being moved into ESSA programs with no carryover limitation

• Transferring funds streamlines administration for LEAs and schools
  • CLIP, I&P, SWP, budgeting, monitoring, completion reports

• When transferring funds, LEAs can still carry out intent of original grants using the increased flexibility afforded by consolidation of federal and state funds
Transferring Funds
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Title II, Part A and Title IV, Part A
Transfers

Number of LEAs

LEA's Transferring out of Title II, Part A
LEA's Transferring into Title II, Part A
LEA's Transferring out of Title IV, Part A
LEA's Transferring into Title IV, Part A

2017  2018  2019  2020
Transferability and Equitable Services

• ESEA section 5103(e)(2) gives LEAs flexibility to transfer some or all of their funds under certain ESEA programs to other eligible ESEA programs.

• LEAs do not need prior approval from GaDOE to exercise the transferability authority, but before an LEA can transfer funds from Title II, Part A, it MUST engage in timely and meaningful consultation with appropriate private school offices.

(Updated Non-Regulatory Guidance 10.7.19)
Updated Non-Regulatory Guidance (10.07.19)
Providing Equitable Service to Eligible Private School Children, Teachers, and Families

**OBLIGATION OF FUNDS**

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

B-26. What is the purpose of the obligation of funds requirement given that an LEA may carry over funds from a given fiscal year and spend those funds in the succeeding fiscal year? The purpose of this requirement is to ensure that an LEA obligates the funds available under Title I to provide equitable services in the fiscal year for which the funds are appropriated so that eligible students, teachers and other educational personnel, and families receive the services to which they are entitled in a timely manner. This provision reinforces the requirement that an LEA conduct timely consultation with private school officials to design appropriate equitable services so that those services can begin at the beginning of the school year for which the funds are appropriated.
B-27. May an LEA carry over unobligated funds despite the statutory requirement regarding obligation of funds?
If an LEA is providing equitable services as required and meeting the obligation of funds requirement in ESEA section 1117(a)(4)(B), it generally should not have any, and certainly not significant, carryover. The ESEA, however, does not prohibit carryover of funds for equitable services and, in most cases, requires it. The following are examples of circumstances that could result in carryover of equitable services funds and how an LEA would use such carryover:

<table>
<thead>
<tr>
<th>Reason for Carryover</th>
<th>Use of Carryover</th>
</tr>
</thead>
<tbody>
<tr>
<td>Services for eligible children in one or more private schools are delayed (e.g., based on a natural disaster, delayed consultation, inability to employ qualified personnel, or unexpected procurement challenges). As a result, the LEA is unable to fully provide required equitable services, and some funds are unobligated at the end of the Federal fiscal year.</td>
<td>The LEA must use the funds to provide equitable services to eligible children in the affected private schools the following year.</td>
</tr>
</tbody>
</table>
New ES4PS Quick Guide for Toggling Years located on Ombudsman Webpage

https://www.gadoe.org/School-Improvement/Federal-Programs/Pages/State-Ombudsman.aspx
Writing Succinct Budget Descriptions

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Well developed descriptions:

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

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

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

Well Developed

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

Well Developed

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

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

Well Developed

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

Well Developed

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

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

Title II, Part A funded job examples:
• Mentors
• Teacher Leaders
• Instructional Coaches
• School Level Professional Development Coordinator
• District Level Professional Development Coordinator
Monitoring Program Performance Requirements

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**ESSA Section 2102(2)(D)**

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

**2 CFR 200.328(a) Monitoring and Reporting Program Performance**

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

**2 CFR 200.301 Performance Measurement (Effectiveness)**

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

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

<table>
<thead>
<tr>
<th>School Year</th>
<th>2020-2021</th>
<th>LEA Name</th>
<th>LEA Coordinator</th>
</tr>
</thead>
</table>

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

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

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

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<table>
<thead>
<tr>
<th>School Year</th>
<th>Column 1</th>
<th>Column 2</th>
<th>Column 3</th>
<th>Column 4</th>
<th>Column 5</th>
<th>Column 6</th>
<th>Column 7</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019-2020</td>
<td>LEA Name</td>
<td>LEA Coordinator</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Goal/Need:** Select from the dropdown the need aligned to the Title II, Part A funded strategy in Column 2.

**Title II, Part A Funded Strategy**
- Reading consultant for each elementary school to provide PD, modeling and feedback to improve teachers’ proficiency with teaching reading.
- PD provided to 6-8 teachers on using benchmark data to determine students’ literacy needs.
- PD provided to high school ELA teachers on strategies to increase student Lexile scores.

**Allowability:**
- Title II, Part A Funded Strategies
  - PL activities must align to ESSA Definition Sec. 8101(42) & SBOE Rule 160-3-3-.04
  - Select from the dropdown the ESSA local use of funds that most closely authorizes the strategy. [Sec. 2103]

**Effectiveness Data:**
- List data to be collected to monitor and measure effectiveness of funded strategies.
- List person(s) responsible for collecting, coordinating and analyzing data to measure effectiveness.

**Administration:**
- Timeline for collecting coordinating and analyzing data.

**Effective & Next Steps:**
- AT THE END OF FY20...
  - Select from the dropdown to assert the level of effectiveness of the IIA funded strategy. Provide a brief year-end summary of data and an analysis supporting the effectiveness assertion including the LEA's next steps for this funded strategy in the analysis.

---

**Example 1:**
- **DIP Goal 1**
- **Use of Funds:**
  - ELA Benchmark data
  - Student Lexile Data from Georgia Milestones Assessment
  - Student ELA scores from Georgia Milestones Assessment

**Example 2:**
- **DIP Goal 1**
- **Use of Funds:**
  - Math Benchmark data
  - Student math proficiency levels on Georgia Milestones Assessment

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**Select End of Year Effectiveness Explanation:**
SECTION III: Title II, Part A Budget Tips And Reminders
What can I do to get my budget approved quickly?

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**TITLE II, PART A**

FY21 BUDGET REVIEW CHECKLIST

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Approve</th>
<th>Revise</th>
<th>N/A</th>
<th>Status</th>
<th>Original Budget Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Must include end of year data summary (column 7), analysis and next steps</td>
<td></td>
<td></td>
<td></td>
<td>In FY20 Attached</td>
<td></td>
</tr>
<tr>
<td>and be uploaded in the attachment tab of the Consolidated Application.</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>(Ineffective strategies should not be funded in FY20 without adjustments)</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>6</strong> FY20 Approved CLIP LEA has an approved CLIP including Prayer</td>
<td></td>
<td></td>
<td></td>
<td>Online CLIP</td>
<td></td>
</tr>
<tr>
<td>Certification and GEPA 427.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>7</strong> REQUIRED ATTACHMENT: EFFECTIVENESS</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>FY21 TITLE II, PART A BUDGET EFFECTIVENESS</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>If applicable, LEA submits a plan outlining how the LEA will monitor for</td>
<td></td>
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<tr>
<td>effectiveness of all Title II, Part A funded strategies.</td>
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<tr>
<td>• Not required for admin. costs in functions 2230 and 2300.</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>• Not required for LEAs that transfer/consolidate 100% of funds.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>8.a</strong> PRIORITIZING FUNDS FOR COMPREHENSIVE &amp;</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TARGETED SUPPORT AND IMPROVEMENT (CSI &amp; TSI Schools) All LEAs must</td>
<td></td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>prioritize Title II, Part A funds to schools that are (1) state identified</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>[comprehensive (CSI) and/or targeted (TSI)] unless other</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>School-Level Prioritization of Funds Worksheet Uploaded</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LEA Level No TSI/CSI</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LEA has CSI</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>
What can I do to get my budget approved quickly?

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

FY20 GCEL Conference

- **USE THE BUDGET CHECKLIST & WRITE COMPLETE SUCCINCT DESCRIPTIONS**
- Use the Georgia LUA Chart of Accounts and Title II, Part A Function and Object Code Quick Guide
- Only budget items allowable under the Title II, Part A local use of funds (including content/focus and intended participants of the PD or in-service training – avoid acronyms)
- Only budget items that align with goals, equity gaps, and/or S-CLIP response
- Include evidence base for Professional Development (2213) and Class Size Reduction (1000)
- Ensure items are necessary, reasonable, allocable, and consistent with grant and 2 CFR requirements (including supplement v supplant)
- If coordinating funds for purchases include the percent funded by Title II, Part A (for example: contracts, personnel, equipment, and software)
- Ensure correct restricted indirect cost rate
- If applicable, include funding for identified CSI/ TSI Schools
- Label budget attachments consistently and identify grant
Allowability Essential Questions
Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved
FY20 GCEL Conference

<table>
<thead>
<tr>
<th>Essential Questions for Identifying and Planning for Title II, Part A Funded Activities/Strategies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the activity/strategy meet the purpose of Title II?</td>
</tr>
<tr>
<td>How is it the activity/strategy aligned to the District Comprehensive Needs Assessment and</td>
</tr>
<tr>
<td>District Improvement Plan?</td>
</tr>
<tr>
<td>Is the activity/strategy one of the ESSA Title II, Part A Local Use of Funds Types of Activities?</td>
</tr>
<tr>
<td>Teaching and Leading (2016)? If applicable, is each participant allowable under the Use of Funds?</td>
</tr>
<tr>
<td>Is the activity/strategy evidence-based using the Title VIII data?</td>
</tr>
<tr>
<td>If professional development, does the PD align with the Title II priorities?</td>
</tr>
<tr>
<td>Will the LEA be able to determine and report how the chosen strategy impacted principal or other</td>
</tr>
<tr>
<td>school leader effectiveness? How will the LEA measure effectiveness?</td>
</tr>
<tr>
<td>Is the activity/strategy supplementing (not supplanting) non-federal funds that would otherwise</td>
</tr>
<tr>
<td>be used for activities authorized under Title II?</td>
</tr>
<tr>
<td>Does the activity/strategy comply with the Code of Federal Regulations (2 CFR Part 200, 34 CFR</td>
</tr>
<tr>
<td>Part 76, 34 CFR Part 81)?</td>
</tr>
</tbody>
</table>

Reminder: All Title II, Part A funded strategies and activities must be aligned to an action step in the CLIP.
ESSA’s Professional Development Definition

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FY20 GCEL Conference

ESSA states explicitly that professional development is not stand-alone, one day or short-term workshops. Professional Development must be sustained, intensive, collaborative, job-embedded, data-driven and classroom-focused.
Everyone wants Title II, Part A money – what’s allowable?

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

FY20 GCELC Conference

Refer to Title II, Part A Handbook
# Title II, Part A Allowable Participants for PD

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

### Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved

FY20 GCEL Conference

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

<table>
<thead>
<tr>
<th>Internal Controls</th>
<th>Required in Writing</th>
</tr>
</thead>
<tbody>
<tr>
<td>§200.61-62 Establish and maintain effective internal control over the federal award</td>
<td>Allowability Procedures - §200.302(b)(7)</td>
</tr>
<tr>
<td>that provides reasonable assurance that the non-federal entity is managing the</td>
<td>Procurement Procedures (specific levels) - §200.319(c)</td>
</tr>
<tr>
<td>federal award in compliance with federal statutes, regulations, and the terms and</td>
<td>Procurement: Competitive Proposals - Method for Conducting Technical Evaluations of</td>
</tr>
<tr>
<td>conditions of the federal award.</td>
<td>Proposals and Selecting Recipients - §200.320(d)(3)</td>
</tr>
<tr>
<td>Internal control is “a process, effected by a LEA’s management personnel,</td>
<td>Conflict of Interest Policy - §200.318(c)</td>
</tr>
<tr>
<td>designed to provide reasonable assurance regarding the achievement of objectives</td>
<td>Compensation – Personal Services (Time and Effort) §200.430</td>
</tr>
<tr>
<td>in the following categories:</td>
<td>Equipment Management Procedures §200.313(d)</td>
</tr>
<tr>
<td>• Effectiveness and efficiency of operations</td>
<td>Cash Management Procedures - §200.302(b)(6) and §200.305</td>
</tr>
<tr>
<td>• Reliability of financial reporting</td>
<td>Segregation of Duties §200.303(a)</td>
</tr>
<tr>
<td>• Compliance with applicable laws and regulations&quot;</td>
<td>Travel Policy - §200.474(b)</td>
</tr>
<tr>
<td>Standards for Internal Control in the Federal Government, GAO-14-794G (The Green Book)</td>
<td>Stipend Policy - §200.403(c), §200.404(e), and GaDOE Rule 160-3-3-.04</td>
</tr>
</tbody>
</table>

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

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**Recommended & Required Internal Controls for LEAs**

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

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

Internal Control Quick Guide located in Title II, Part A Handbook
Required Components of Stipend Policy:

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

2 CFR §200.403(c), §200.404(e)
Internal Controls - Time and Effort
Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved
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Essential Components of Time and Effort Policies and Procedures:

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

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

Reminder: Charges must be based on records that accurately reflect the work performed, must supported by system of internal controls, and meet the other general requirements in 2 CFR 200.430(i)
Internal Controls Help Prevent Fraud
Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved
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Who commits fraud:
• School employees
• School officials
• Grant managers
• Central office staff

How Fraud is Committed:
• Misapplication
• Grant fraud
• Procurement fraud
• Bribery/kickbacks
• Theft/embezzlement

Office of the Inspector General
Fraud Indicators
Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved
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- No separation of duties
- Lack of internal controls
- Lack of audits or repeat findings
- Lack of documentation for questioned costs
- High turnover of personnel
- Unexplained entries in accounting records
- Unusually large amounts of cash payments
- Inadequate or missing documentation
- Altered records
- Inventories and financial records not reconciled
- Unauthorized transactions
- Unreasonable costs

Office of the Inspector General
Your Role in Preventing Fraud
Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved
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As the Grant Manager:
• Develop and maintain detailed Internal Controls
• Train everyone on your Internal Controls
• Review and question all documentation
• Request adequate information

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

Office of the Inspector General
Reminders Closing Out FY20 and Going Into FY21

• The LEA’s FY21 identified needs and action steps (not strengths and challenges) in the approved FY21 CLIP will determine the allowable activities that may be budgeted for Title II, Part A

• This is the time of year to be sure that all charges to the grant are allowable, all participants are allowable, and all professional development (PD) aligns with the ESSA PD definition

• Now is the time of year to ensure all source documentation for FY20 expenditures is being collected and filed (Refer to Title II, Part A Handbook)
Reminders Closing Out FY20 and Going Into FY21

• This is also the time of year to ensure all records for time and effort (annual or periodic certifications, time logs) are being collected and filed (Refer to Title II, Part A Handbook)

• Teachers who serve as mentors may complete work during the school day. The submission of a mentor job description with the budget submission should illustrate that the work is above and beyond what is required of the contracted position.
SECTION IV:
Title II, Part A
Budget Updates
Title II, Part A Budget Updates
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• SBOE approved (02.20.20) Title II, Part A reallocations based on FTE and Poverty counts for new, expanding, or closing charters.
• Updated GANS are available in the attachment tab of each LEA’s ConApp.
• Data Collection Forms are currently being reviewed for FY21.
Questions
Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved
FY20 GCEL Conference
Evaluation
Rejection, It Hurts! How to Get Your Title II, Part A Budget Approved
FY20 GCEL Conference

Please use the QR code to complete an evaluation of this session.