

# FY23 Cross Functional Monitoring (CFM) Pre-Recorded Webinar Series

**Title II, Part A**

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# Presenters



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## Title II, Part A Specialists



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# Agenda

## Title II, Part A Guidance for Monitoring of Indicators 1-5

- Indicator 1
- Indicator 2
- Indicator 3
- Indicator 4
- Indicator 5.1, 5.2 and 5.3



Note: Please view the pre-recorded webinar for the Federal Programs Overarching Indicators for a more in-depth review of indicators 1-5

# Indicator 1

## Monitoring the Program and Effectiveness

1.2 – Monitoring the implementation of the Title II, Part A program

1.3 – Monitoring the effectiveness of FY22 Title II, Part A

Summary data (source documentation **and** written analysis of data collected) that was collected to determine the effectiveness of the FY22 Title II, Part A funded activities as determined in the LEA's FY23 Title II, Part A Program Information tab data collection forms submission.

# Indicator 1

## Evidence/Documentation

- 1.2 – Documentation will provide evidence that the LEA is monitoring the Title II, Part A program.
  - Examples may include sign in sheets, agendas, emails, purchase orders, periodic certification, consultation with stakeholders, etc.
- 1.3 Effectiveness documentation that includes data **and** an analysis of the data to describe the effectiveness of the funded activities

IIA Funded Activity	Data Collected	Analysis of Data	Effectiveness
Mentors <b>Example</b>	<ul style="list-style-type: none"><li>• Attrition rate of new teachers at the end of the school year.</li><li>• Surveys completed by mentors and mentees.</li></ul>	The attrition rate decreased from 4.6% in FY21 to 2.6% in FY22. Survey responses from mentees reflected mentors had a positive influence on new teaches.	Effective – Maintain

# Indicator 1

## Common Misunderstandings

### Indicator 1.3

- Not including all funded items in the previous year
- Data not included
- Written analysis (narrative) not provided
- Providing evidence base rather than effectiveness



# Indicator 2.1

## Evidence-base and Stakeholders



### 2.1.A LEA FY23 CLIP approval

### 2.1.B Evidence Base

Documentation to support the selection of evidence-based interventions for each Title II, Part A funded action step in the FY23 CLIP

### 2.1.C Stakeholders

FY23 Documentation showing all required stakeholders applicable to LEA were involved in the CLIP preparation (sign-in sheets or surveys with stakeholder names **and** roles)

# Indicator 2.1

## Evidence/Documentation

### 2.1.B - Evidence base

Sample evidence base document:

IIA Funded Act.(must include all PD and CSR in FY23 CLIP)	Evidence base descriptor provided in FY23 CLIP	Link to evidence base source document
Instructional Coaches	Promising	<a href="https://www.tandfonline.com/doi/abs/10.1080/19415257.2018.1452781">https://www.tandfonline.com/doi/abs/10.1080/19415257.2018.1452781</a>

Example

### 2.1.C Stakeholders

**Title II, Part A required stakeholders:** teachers, principals/other school leaders, paraprofessionals, parents, community partners, Charter School leaders, specialized instructional support personnel and other relevant organizations or partners.



# Indicator 2.1.B

## Common Misconceptions

### 2.1.B Evidence base

- Based on activities in the budget instead of CLIP (use the CLIP)
- Not including links to the documents used to determine evidence base
- Not aligning the evidence base documents with the description provided in the CLIP (strong, moderate, promising and demonstrates a rationale/logic model)
- Providing effectiveness rather than evidence

### 2.1.C Stakeholders

- Not including all required stakeholders (use Title II, Part A checklist)
- Not identifying the role of each stakeholder
- Not providing documentation of topics covered with stakeholders

# Indicator 3

## Equitable Services

The LEA conducts monitoring of its programs for both implementation and effectiveness of funded strategies/activities at the LEA, school, and program levels to ensure compliance with Uniform Grant Guidance and Federal program requirements.

LEAs must offer equitable services to private schools whose physical location is within the geographic boundaries of the service area of the approved grant application.

# Indicator 3

## Evidence/Documentation

### All LEAs must provide:

- 2022 and 2023 Invitations
- Good faith effort
- Initial consultation

### LEAs with participating private schools:

- Form A
- Form B
- Nonprofit status
- Verification of K-12 enrollment
- Needs assessment
- Plan and budget
- Ongoing consultation
- Complaints if applicable

# Indicator 3

## Common Misconceptions

- LEAs sending invitations through ES4PS only and not receiving a response. **The LEA must demonstrate good faith effort by contacting the private school through multiple methods.**
- Not sending an invitation to all private schools within the LEA's geographic boundaries each year.
- Not providing current nonprofit status for all participating private schools.
- No evidence of ongoing consultation with private schools.
- Not providing evidence of a needs assessment and implementation plan for services.
- Not providing private school expenditure documentation

# Indicator 4

## Maintenance of Effort

- GaDOE calculates Maintenance of Effort (MOE) for all LEAs (including those LEAs consolidating funds).
- While this applies to Title II, Part A, this is calculated and determined by the Finance and Business Office (FBO).
- Title I, Part A will check MOE for all federal programs.



# Indicator 5.1

## Internal Controls

Required Internal Controls to be in writing (include updated content/citations, consistent across all federal programs, consistent with practice):

- **Allowability** 2 CFR §200.302(b)(7)
- **Segregation of Duties** GAO-14-704G - 10.03, 10.12-10.14
- **Procurement Procedures** 2 CFR §200.319(c)
- **Method for Conducting Technical Evaluations** of Competitive Proposals and Selecting Recipients 2 CFR §200.320(d)(3)
- **Conflict of Interest Policy** 2 CFR §200.318(c)

# Indicator 5.1

## Internal Controls (cont.)

**Required Internal Controls to be in writing (include updated content/citations, consistent across all federal programs, consistent with practice):**

- **Personal Compensation Policies** – Time and Effort to include salaries, substitutes and stipends. 2 CFR §200.430 and GaDOE Rule 160-3-3-.04
  - **Stipend** policy must include: Process for payment is consistent across federal programs and federal/non-federal programs, Reference to SBOE citation, Incorporates/aligns with SBOE content, Includes process for how stipends are paid, Align to LEA or school initiative or individual PD Plan Skills, knowledge, or practices gained have been implemented/demonstrated in classroom/work setting, Beyond regular contract hours, days, or school year)
- **Travel Policy** 2 CFR §200.474(b)

### **Recommended Internal Controls**

- **Suspension and Debarment** – check for procedures if purchases above \$25,000 threshold
- **Written Transferability Procedures** - procedures to ensure transferred funds are drawn down appropriately

# Indicator 5.1

## Internal Controls – Evidence/Documentation



- LEAs are encouraged to **train all personnel** on the internal controls.
- LEAs should **develop (or revise) internal controls that are broad and apply to multiple programs** – not a specific program. Remember that ‘Title I’ is not interchangeable for ‘Title II’; however, the use of ‘Federal Programs’ is inclusive of the Title II, Part A grant.
- LEAs may publish a Federal Programs Manual or Handbook (not required) which includes required internal controls. If a manual is provided, LEAs should identify the section of the document where each internal control can be located.
- LEAs should **create internal controls which address a position or office** rather than a specific person.
- LEAs should review/revise internal controls as needed to **ensure that the LEA is following its current internal controls**. Internal controls should include a date of the last time they were revised and/or reviewed.
  - LEAs who have been monitored in recent years and were required to revise their internal controls should ensure that these approved revised internal controls from the Corrective Action Plan (CAP) are reflected in the FY23 Internal Controls.



# Indicator 5.1

## Internal Controls – Common Misconceptions

- Citations are outdated or not included
- Includes the name of another LEA
- Includes unallowable language for noncompetitive procurement (sole source)
- Addresses a specific person instead of a specific role
- Internal controls are partial, unorganized, borrowed or inconsistent with current practices.

# Indicator 5.1

## Expenditures



- Title II, Part A specialists will request source documentation for specific expenditures based on FY22 and FY23 expenditure reports and payroll reports.
- The expenditure reports should be detailed to show specific function and object codes for each Title II, Part A expenditure.
- The Title II, Part A Specialists will email a list of the specific expenditures selected for monitoring prior to monitoring.

# Indicator 5.1

## Expenditures – Evidence/Documentation

Title II, Part A Specialists will review:

- FY22 and FY23 Expenditure Detail reports
- Documentation to support the allowability of GaDOE selected sample expenditures
- FY22 and FY23 Payroll Reports
- Approved FY22 and FY23 Title II, Part A budgets
- FY23 Transfer of Funds
- FY23 Consolidation of Funds
- Time stamped SAM document for applicable expenditures
- Copy of single audit for last two years
- FY22 Title II, Part A Completion Report – does it match the function codes, object codes, and amounts in the approved budget?

# Indicator 5.1

## Expenditures - Common Misconceptions

- Expenditures are not aligned with approved Title II, Part A budget by function and object code (FY22 or FY23)
- Segregation of duties not evident
- Unallowable participants and activities
- Expenditures are not necessary, reasonable, or allocable
- All required source documentation not provided (See suggested source documentation in Title II, Part A handbook appendix)
- Contract oversight not provided
- Does not follow LEA procurement procedures
- Time and effort does not reflect after the fact authorization, allowability, and budget alignment
- Corrective Action Plan (CAP) not Implemented (if applicable)
- General Ledger does not align with the Title II, Part A Completion Report

# Indicator 5.2

## Inventory

- Budgets and Completion Reports will be reviewed by Title II, Part A Specialists from **FY19** to **FY23** to see if items were purchased in object codes 615 or 616.



# Indicator 5.2

## Inventory – Evidence/Documentation

**Internal Controls for equipment, this applies to all LEAs, even if no equipment purchased.**

- Property records with all required descriptors
- Procedures stating an annual physical inventory is taken
- Procedures for adequate safeguards to prevent loss, damage or theft
- Investigative procedures for loss, damage or theft
- Adequate procedures for maintaining equipment
- Disposition procedures

Other documentation reviewed if equipment has been purchased:

- Purchase orders
- Annual physical inventory
- Sale for highest return
- Adequate safeguards
- Compliance with disposition

# Indicator 5.2

## Inventory – Evidence/Documentation (cont.)

### Property records must include:

- Item Description
- Cost
- Source of funding – FAIN number (this changes each year)
- Date of purchase
- Vendor Serial number or ID number
- Location of equipment
- Use of equipment
- Condition of property
- Disposition/disposal date

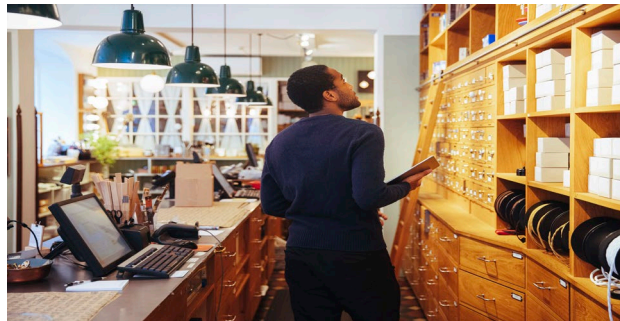
Other documentation reviewed if equipment has been purchased:

- Purchase orders
- Annual physical inventory
- Sale for highest return
- Adequate safeguards
- Compliance with disposition

# Indicator 5.2

## Inventory – Common Misconceptions

- Not realizing equipment was purchased in the past five years (review completion reports for FY19-FY22 and FY23 budget)
- Equipment was purchased, but not on inventory list
- Physical inventory not conducted per internal controls
- LEA uses the same FAIN number for multiple years
- All required information not included on property inventory list





# Indicator 5.3

## Cash Management

- Written Cash Management Internal Controls
- Transfer procedures
- Title II, Part A Coordinator approval of drawdowns.



# Indicator 5.3

## Cash Management – Evidence/Documentation

- ❑ Written cash management internal controls that describe procedures to ensure the LEA:
  - ❑ does not overdraw
  - ❑ minimizes the time elapsed between the transfer of funds and disbursement
  - ❑ requests for federal funds are evaluated and approved by program coordinator
  - ❑ drawdowns are only for immediate needs
  - ❑ reconciles drawdown requests and maintains supporting documentation for each drawdown
- ❑ If transferring Title II, Part A funds, funds must be drawn down before funds are drawn down from the receiving program. Drawdown dates for each program will be checked during monitoring.
- ❑ Expenditure detail reports to support each drawdown The amount of each drawdown should match the total of expenses during that time period.

# Indicator 5.3

## Cash Management – Evidence/Documentation (cont.)

- ❑ GaDOE will pull DE0147s for the LEA or request DE0147 Fund Requisitions if the LEA uses a different form
- ❑ Title II, Part A Coordinator approval of each drawdown This could include email approval or copies of documents signed with approval
- ❑ Drawdowns are only for immediate needs (reimbursement of expenditures)
- ❑ Completion report matches budgeted categories Review the completion report before it is submitted and do a budget amendment if the completion report does not match your budget.

# Indicator 5.3

## Cash Management – Common Misconceptions

- No evidence of Title II, Part A Coordinator authorizing drawdowns. **This could include email approval or copies of documents signed with approval.**
- Completion report does not match the approved Title II, Part A budget. **A budget amendment should be done if the completion report does not match your approved budget.**
- Title II, Part A funds are not drawn down before funds are drawn down from the transferred program.
- Expenditure reports from the transferred program are not provided for drawdowns.

# Title II, Part A Team



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