FY20 Title III, Part A Budgeting Webinar

Everything you need to know to prepare and monitor your Title III program budget!

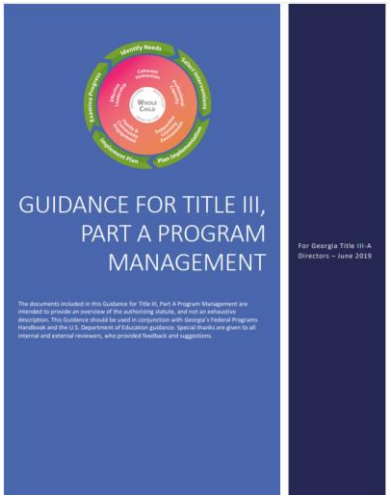
August 16, 2018
1:00 p.m.

Georgia Department of Education

What do I need to know before budgeting Title III Funds?

- Title III, Part A Statute - requirements for a language instruction program that supplements the core ESOL language program
- July 12, 2019 Federal Programs Budget Training PPT Title III Specific Information (Slides #185 - 228)
- Schools' Civil Rights Obligations to English Learners and their Families. (ESOL Language Program Requirements)
- ESOL QBE/FTE allocations – GaDOE Budget Services/QBE Reports/Allotment Sheets

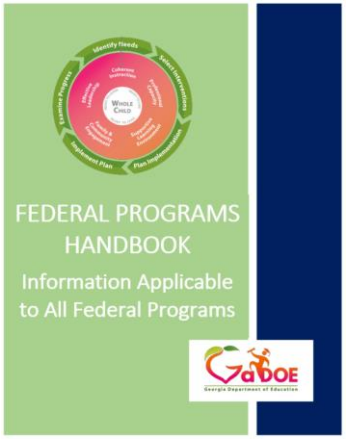
Title III Program Management Resources



Title III Program Management

- Title III, Part A Statute: (Printing in landscape orientation recommended)
- Title III "Pink Book" Cover
- NonRegulatory Guidance: English learners and Title III of the ESEA as amended by the ESSA, 9-23-2016
- Addendum to the Sept 23, 2016 Non-Regulatory Guidance: English learners and Title III of the ESEA as amended by the ESSA, 1-2-2019
- FY20 Title III, Part A Language Programs Management Guidance
- 2019 Federal Programs Conference Title III Program PPT
- Title III, A Non-Regulatory Guidance Equitable Services for Private Schools

Title III Program Management Resources



Title III Budget Development Tools

- FY20 Chart of Accounts
- FY20 Budget Guiding Questions
- FY20 Federal Programs Overall Budget Training - Title IIIA Section
- FY20 Title IIIA Budget Webinar **(16 Aug 2019)**
- FY20 Effectiveness Level Template (Fillable Form)
- Title III-recommended Logic Model Template
- Field Trip Approval Form
- Indirect Cost Rate Calculator

Immigrant Grant Guidance

- Immigrant Definition and Allocation Rules
- Immigrant Funds - Allowable Activities

Critical Summary

- Title III is federal funding that supplements (goes above and beyond) your State ESOL funding, which is based on your ESOL FTE.
- Title III funds **may not** fund anything necessary to run your basic, high-quality ESOL program (see Budget Training PPT)...NOR can Title III fund anything that is required by **other** Title programs **or** the Office for Civil Rights.
- To use Title III funds on something required by a different law, by OCR or that is otherwise provided to non-ELs, would likely constitute "supplanting".

FY20 Title IIIA English Language Acquisition Grants from USDE for LEAs

$14,882,185

95% English learner subgrant

$14,138,076

5% Immigrant subgrant

$744,109

How was the FY20 LEA Title III, Part A EL subgrant calculated?

$14,138,076

EL portion of USDE Title III SEA grant is divided by the total EL student population in Georgia (public + private) as of March 2019.

123,143

FY20 English Learner Per Pupil Allocation = $114.81

123,143

Number of EL students in each LEA is multiplied by the PPA to see which LEAs meet the $10,000 minimum Title III subgrant

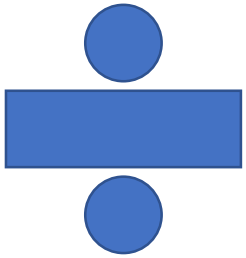
89 EL students are needed to earn the minimum $10,000 Title III subgrant.

94 / 120

Per English Learner Allocation

Total amount of Title IIIA English Learner grant

$14,138,076



Total number of EL students in eligible LEAs (March FTE)

120,337

Per EL student Allocation Amount

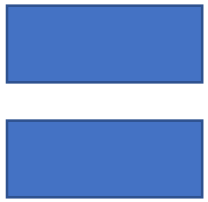
$117.49

Per EL student Allocation Amount

$117.49

Number of EL students in LEA (March FTE)

_____?



LEA Title IIIA Allocation Amount

_____?

Grant Award Notification

FAIN: S365A190010

See Federal Programs' Budget Webinar July 12, 2019

Important Budget Dates

- **July 1, 2019 - September 30, 2020**

  FY20 15-month Grant Period of Performance

- **October 1, 2019**

  FY20 Budget submission - fiscal year begins

- **October 2019**

  FY19 Completion Report Submitted

- **November 2019 - September 30, 2020**

  Carryover received and budgets amendments due

Period of Performance

- 15 months to spend original allocation (June, July, August)
- 27 months to spend any carryover funds
- Funds intended to benefit EL & Immigrant students in the fiscal year for which they were granted per EL Program Plan
- Purchases may extend beyond one year to take advantage of cost reductions *IF the students in the current fiscal year receive benefit from the purchase*.
- **Leases/Licenses/Subscriptions**: IF instructional software subscriptions are purchased after January, the LEA **must** provide explanation within the budget line description indicating how students in the current fiscal year will benefit from the purchase

Title III-A English Learner Program Requirements

Title IIIA Statute

GaDOE Georgia Department of Education

Title III requires that you…

- Provide effective, additional language instruction to select EL students beyond your State ESOL program – an effective LIEP.
- Provide effective, ongoing sustained EL-focused professional learning related to teachers, administrators, and any other staff in contact with EL students.
- Develop effective, additional activities/strategies to enhance the Title III LIEP by engaging EL parents and community members in it.

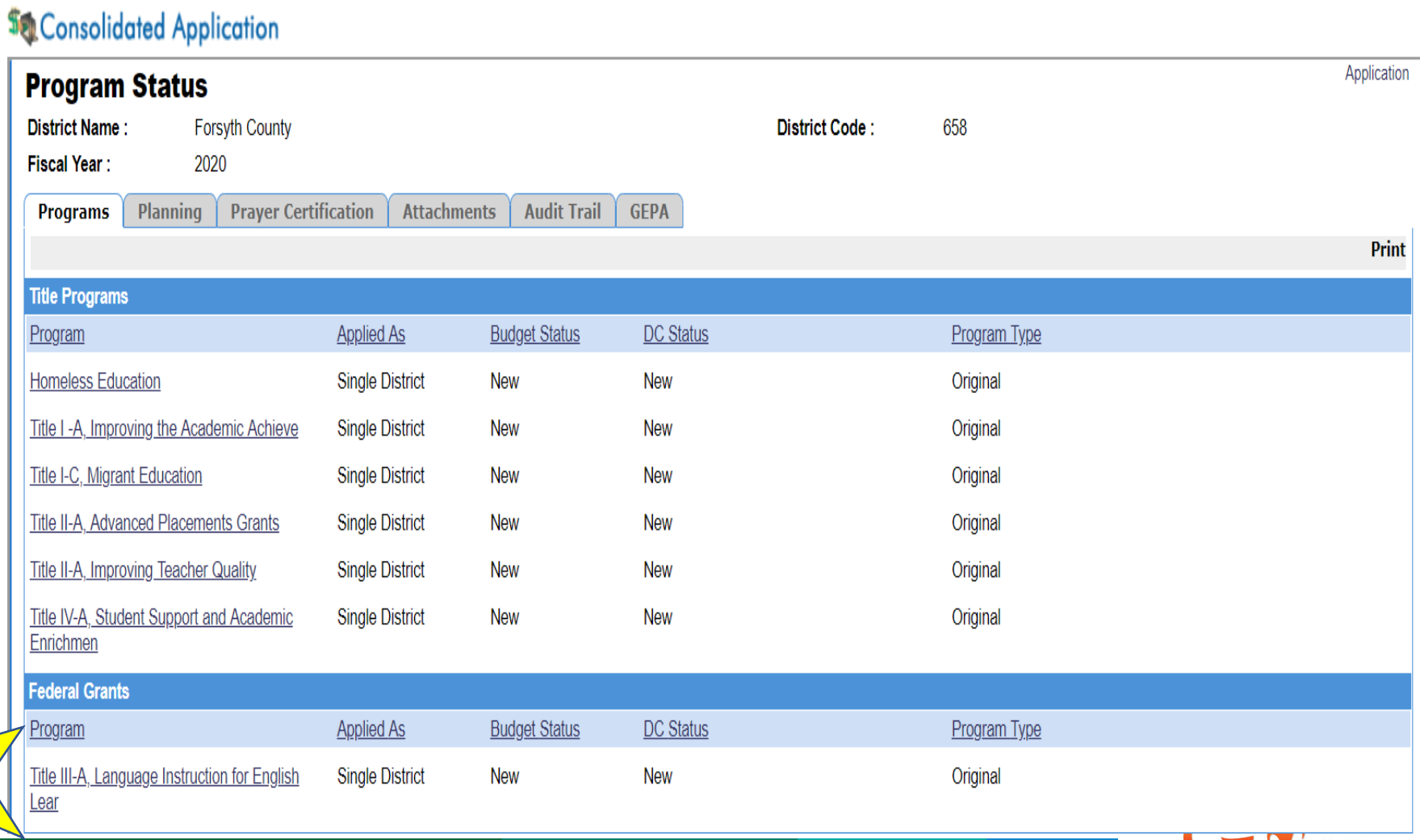
Presumption of Supplanting:

1. Are the expenditures or activities required by other Federal, State, or local laws?
2. Were the expenditures or activities funded in previous years by other programs or non-federal funds?
3. Would the expenditures or activities happen in the absence of Federal funds?

Steps before Submitting Budget

1. Program Assurances
2. Program Information Tab
3. Budget Building
4. Attachments

Add Budget: Title III-A Language Instruction for English Learners



Do you know what assurances you are giving the state?

Consolidated Application

Assurances

District Name : Forsyth County
Fiscal Year : 2020
Status : New (Date: Aug 7 2019 9:54AM)

District Code : 658
Program : Title III-A, Language Instruction for English Lear - Original
Superintendent Sign off date :

Program Information | Budget | Audit Trail | Assurances | Programs | Attachments

Print

Assurances

Need to accept Assurances to Sign Off

General Assurances :

Program Specific Assurances :

Title III, Part A - Language Instruction for English Learners

The LEA assures compliance with standardized, statewide EL entrance and exit procedures and screens all students who may be English learners within 30 days of enrollment [Sec. 3113(b)(2)].

The LEA assures compliance with Sec. 1112(e) (Parent's Right-To-Know) prior to, and throughout, each school year as of the date of application [Sec. 3116(b)(4)(A)].

The LEA assures that it is not in violation of any State Law, including State constitutional law, regarding the education of English learners, consistent with Sections 3125 (State ESOL code) and 3126 (Federal Civil Rights) [Sec. 3116(b)(4)(B)].

The LEA assures that consultation took place with teachers, researchers, school administrators, and parents and family members, community members, public or private entities, and institutions of higher education, in developing and implementing its educational plan for English learners [Sec. 3116(b)(4)(C).

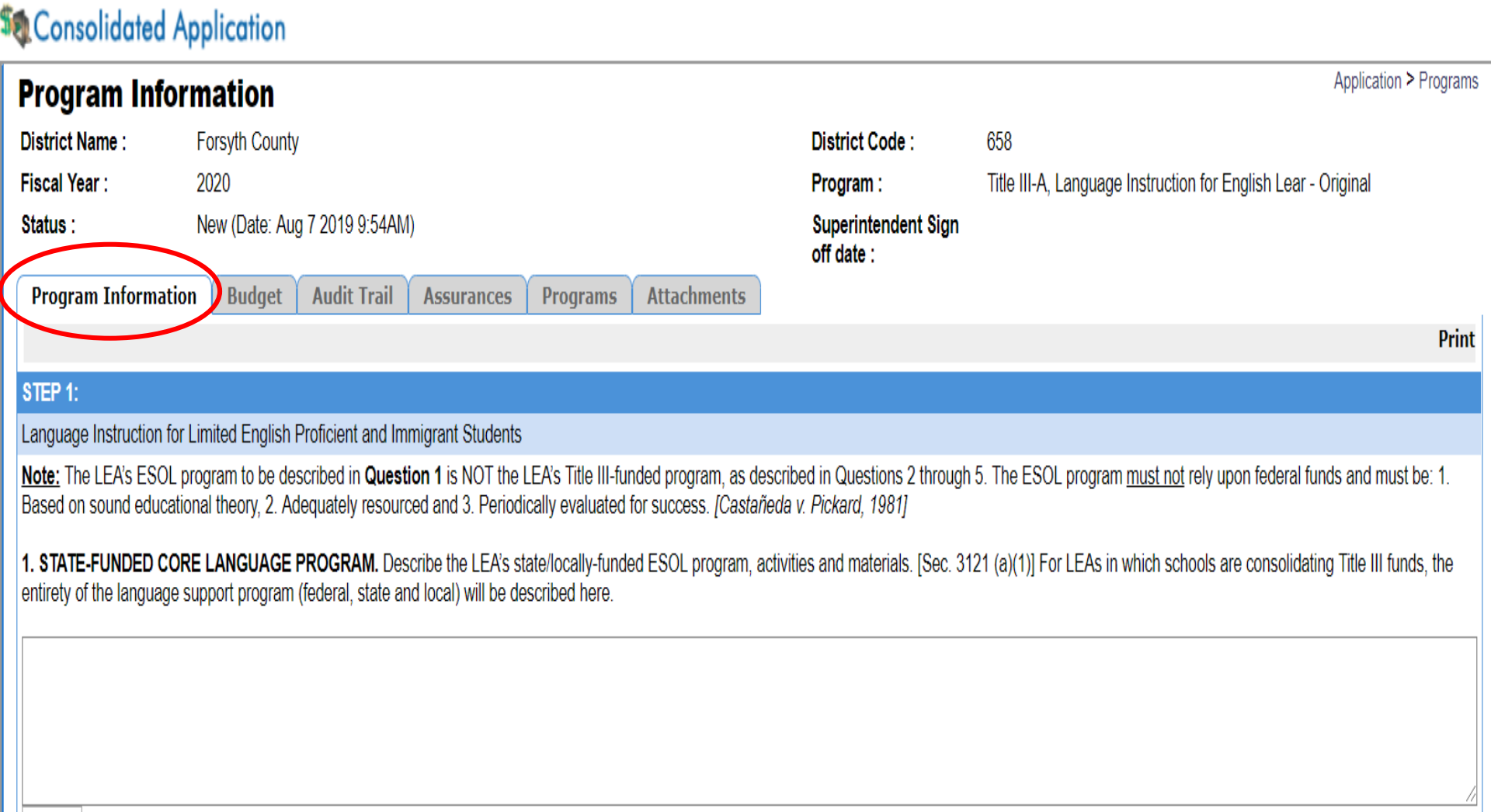
The LEA assures that, if applicable, it will coordinate activities and share relevant data under its plan with local Head Start and Early Head Start agencies, including migrant and seasonal head Start agencies, and other early childhood education providers [Sec. 3116(b)(4)(D)].

The LEA assures that all teachers in any Title III-funded language instruction educational program are fluent in English and any other language used for instruction, including having written and oral communications skills [Sec. 3116(c)].

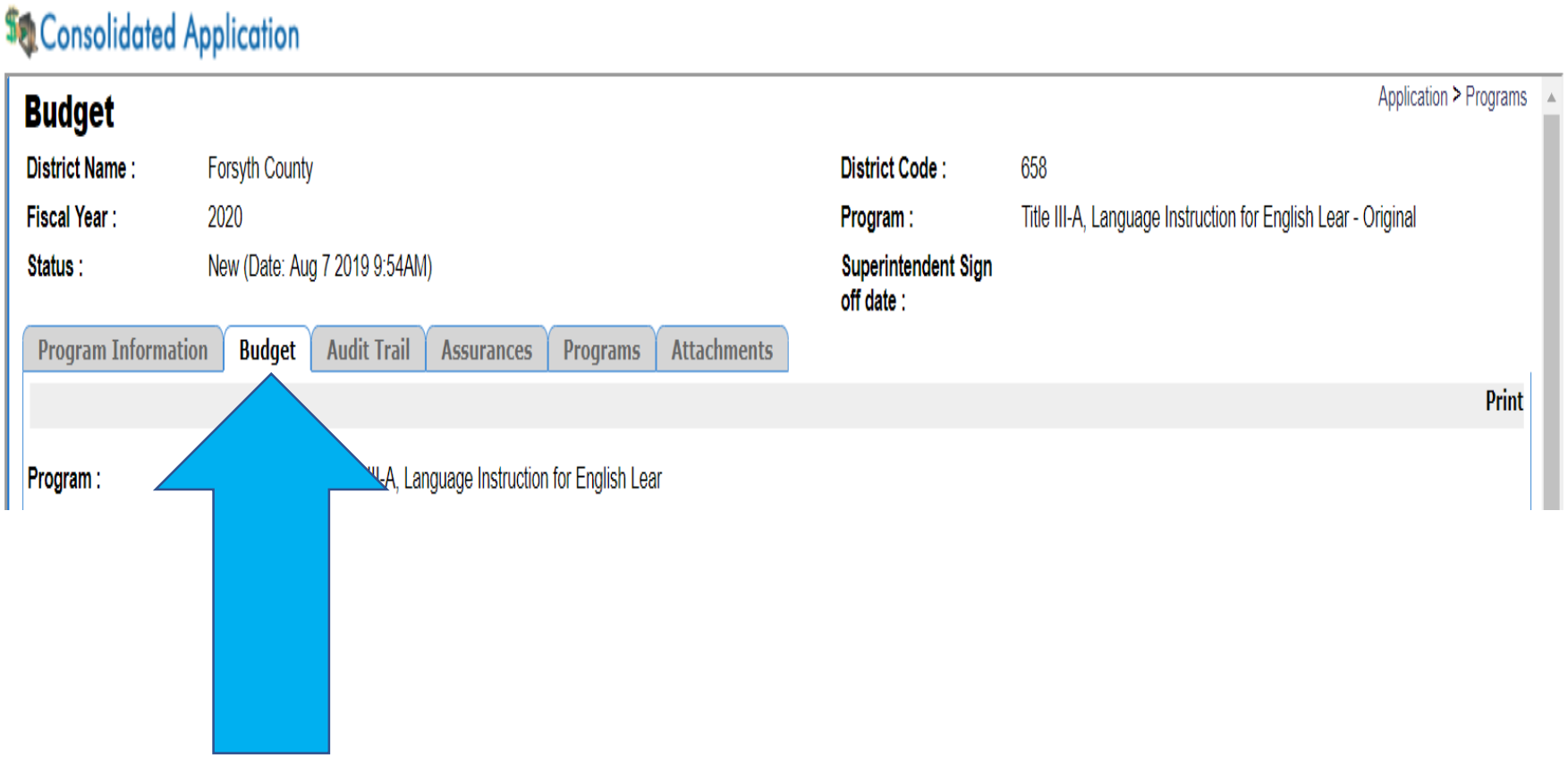
The LEA assures that it assesses the English proficiency of all English learners consistent with Sec. 1111(b)(2)(G) [Sec. 3113(b)(3)(B)].

The LEA consults with officials of private schools in a timely and meaningful manner to make available equitable Title III, Part A services to eligible English learners and immigrant children attending private schools located within the LEA's geographical boundaries [Section 9501].

Title IIIA Program Information Tab



Budget Tab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Budget
Application > Programs
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Program Information
Budget
Audit Trail
Assurances
Programs
Attachments
Print
Program :
III-A, Language Instruction for English Lear

TIPS for Successful Budgets!

- Budgets must be based on the annual needs assessment, be evidenced-based and be reflected in the EL Program Plan (budget worksheet).
- Collaborate with appropriate LEA staff to plan budgets and braid funds with other federal programs, when necessary.
- Follow Federal Programs Budget Requirements
- Follow Title III specific guidelines & tools

Tools for Building the

Federal Programs Chart of Accounts

- Functions
- Objects

Budget Guiding Questions Chart

- Clarity
- Comprehensiveness
- Consistency
- Specificity

- Indirect Cost Worksheet Calculator
- Field Trip Form
- Effectiveness Templates

Which Function Codes Match our EL Program Plan?

Georgia Department of Education
FY20 Title III Chart of Accounts

	A	B	C	D	E	F	G	H
1	Object Codes	1000 Instruction	2100 Pupil Services & Family Engagement	2210 Improvement of Instructional Services.	2213 Instructional Staff Training	2230 General Administration	2300 Audit Cost and Indirect Cost	2700 Student Transportation Services

Answers to Question #2

Answers to Question #4

Answers to Question #3

Answers to Question #3

Answers to Question #2

24	292 - Life Insurance
25	300 - Purchased Professional/Tech Svcs.
26	430 - Repair, Maint. Services
27	432 - Repair and Maint-Tech Related
28	441 - Rental of Land, Buildings
29	519 - Student Transportation Purchased From Other Sources
30	530 - Communications, telecommunications
31	532 - Web-based Subscriptions & Licenses
32	580 - District Staff Travel
33	595 - Other Purchased Svcs.
34	610 - Supplies
35	611 - Supplies: Technology Related

2	110 - Instructional Staff/Coach
3	113 - Substitute (for teachers)
4	114 - Substitute (for parapros)
5	116 - Professional Dev.Stipends
6	140 - Aides, Paraprofessionals
7	142 - Clerical
8	172 - Elementary Counselor
9	173 - Secondary Counselor
10	176 - School Social Worker
11	177 - Family Services, Parent Coordinator
12	180 - Bus Drivers
13	190 - Other Management Personnel

14	191 - Other Administrative Personnel
15	199 - Other Salaries and Compensation
16	210 - State Health Insurance
17	220 - FICA
18	230 - TRS
19	250 - Unemployment Compensation
20	260 - Workers' Compensation
21	280 - Benefit in Lieu of Soc.Security
22	290 - Other Employee Benefits
23	291 - Dental Insurance

36	612 - Computer Sofware that is Actually Owned on Hard Disk
37	615 - Expendable Equipment - calculators, VCRs, DVD players
38	616 - Expendable Computer Equip. <$5,000 - computers, printers, disk drives, smartboards
39	620 - Energy
40	641 - Textbooks
41	642 - Books (Non-Textbooks) & Periodicals
42	810 - Registration Fees
43	880 - Fed. Indirect Cost Charges
44	881- Schoolwide Allocations

Which Object Codes do we need for our EL Program Plan activities, strategies, and programs?

Overarching Question for Functions 2230 + 2300: Have I exceeded the 2% CAP for Direct Administrative Costs?

Function	Object	Description Questions Checklist	Title III Documentation
2230 – General Administration of Grant	**142** Salary of Secretarial Staff	☐ Are the secretary's duties related directly to the management of the grant? ☐ Is this position partially or fully funded in Title IIIA? ☐ Does the job description clearly indicate Title III grant management duties in the Title IIIA portion? ☐ Has the job description been uploaded?	• Periodic Certification or split fu time logs • Job Description
	190 Other Management Personnel	☐ Is the Title IIIA director's salary partially or fully funded in Title IIIA? ☐ Does the job description clearly indicate Title IIIA grant management duties in the Title IIIA portion? ☐ Has the job description been uploaded?	• Periodic Certification or split fu time logs? • Job Description
	191 Other Administrative Personnel	☐ Is the Title IIIA director's salary partially or fully funded in Title IIIA? ☐ Does the job description clearly indicate Title IIIA grant management duties in the Title IIIA portion? ☐ Has the job description been uploaded?	• Periodic Certification • Job Description
	200 Benefits	☐ Are these for the personnel listed above?	
	430 Repair & Maintenance	☐ Is this for Title IIIA purchased equipment that is being used to administer and manage the grant?	• P.O.s
	432 Repair & Maintenance – Technology	☐ Is this for Title IIIA purchased equipment that is being used to administer and manage the grant?	• P.O.s
	580 Travel	☐ Is this the director's travel to grant management conferences and trainings?	• Travel Documentation • Federal Programs Handbook policies/procedures
	611 Supplies – Technology	☐ Are these reasonable & necessary to manage the grant?	• P.O.s

Using the Guiding Questions!

Functions 2230 & 2300 Cont.

	615 & 616 Expendable Equipment	☐ Are these reasonable & necessary to manage the grant? ☐ Are LEA Federal Programs inventory procedures followed?	• P.O.s • Federal Programs Handbook policies/procedures
	810 Dues and Fees	☐ Is this subscription necessary to manage the grant? ☐ Is this a conference registration for the Title IIIA director to attend a conference focused on managing the grant?	• P.O.s • Federal Programs Handbook policies/procedures
	882 Consolidation of Administrative Funds*	☐ If the LEA is consolidating admin funds, have we budgeted all the 2% of the original allocation here? ☐ Did we round up or round down? (must round down any 2% amounts with cents)	NO DOCUMENTATION NEEDED!
2300 **Audit Cost & Indirect Costs**	**300** Purchased Professional Services	☐ Audit Costs	• P.O.
	880 Federal Indirect Costs	☐ IF the LEA is charging Indirect Costs to Title IIIA, does the Indirect Cost Rate match the LEA's negotiated Federal Programs' Indirect Cost Rate? ☐ Have we attached Title III's Indirect Cost Worksheet?	• Copy of LEA's negotiated Indirect Cost Rate • Indirect Cost Worksheet (downloaded from Title IIIA website)

**Only for LEAs with GaDOE approval to consolidate administrative funds.*

Direct vs. Indirect Admin Funds

- 2% CAP of the **original allocation** for direct admin expenses
  - Includes DIRECT Admin Costs + Audit Costs.
  - Includes both Functions 2230 + 2300
  - Does not include Indirect costs
  - If consolidating administrative costs, put the entire 2% in #2230/882
- Indirect Cost rate must match the LEA's negotiated FY20 Title IA indirect cost rate. (see worksheet)
  - Charging indirect costs to the Title IIIA grant is **not** required

Common Budget Errors: Functions 2230 & 2300 - Admin

- More than the 2% CAP on the **original** allocation amount
  - Rounded up instead of down, when cents involved…
- Used wrong codes
- Lack of job description for personnel
- Didn't split-fund the job description
- Didn't use the correct Indirect Cost rate
- Didn't upload Indirect Cost worksheet

Function Codes for EL Focused PD

Georgia Departm Education
FY20 Title III Ch Accounts

	A	B	C	D	E	F	G	H
1	Object Codes	1000 Instruction	2100 Pupil Services & Family Engagement	2210 Improvement of Instructional Services.	2213 Instructional Staff Training	2230 General Administration	2300 Audit Cost and Indirect Cost	2700 Student Transportation Services

Answers to Question #2

Answers to Question #4

Answers to Question #3

Answers to Question #3

Answers to Question #2

Function 2210 vs. 2213

- In general, **Function #2213** should be used for **professional development of instructional staff:** *teachers, paraprofessionals, principals, assistant principals and instructional coaches*.
- **Function #2210** is for the *Improvement of Instructional Services* and should not be used for any PD costs.
  - Instructional coaches developing EL curriculum for ESOL 55.XXXXX courses or LEA curriculum maps with EL language objects & scaffolds

Function	Object	Description Questions Checklist	Title III Documentation
2210 – Improvement of Instruction - Includes all activities that enhance the instructional experience of the students. This includes technology	**190 or 191** Teachers, Other Management and other Administrative Personnel	☐ What is this position? ☐ Is this fully funded or split-funded? ☐ What is the Title III portion and who is paying the other portion? ☐ Is there a corresponding Job Description uploaded in the ConAPP for this position? ☐ How does this position accomplish the intents and purposes of the grant? ☐ Why is this position necessary? ☐ Is the salary reasonable & adheres to LEA Federal Policies/Procedures?	• Job Description • Periodic Certification Forms • Time Logs, if split-funded • Daily work schedule
services, academic coaches, online learning programs for the students, etc.	**199** Other Salaries & Compensation	☐ Is this additional compensation for someone providing EL-related professional development or doing curricular work to school/district staff? ☐ How many staff members are getting this additional compensation? ☐ What is the hourly rate? ▪ Does the hourly rate match the District's Federal Programs' hourly rate for additional compensation? ☐ How many hours (or days) of additional work does this include? ☐ How does this align with the District's Title IIIA EL-focused PD Plan? ☐ Have we uploaded an informal job/work description? ☐ Did we specify the timeframe for the work? Before school, after school, summer, Saturday school, etc.? ☐ Did we label the level of effectiveness for this activity/strategy/program?	• Informal job description • Time logs • Agendas, Notes, Other documentation • Deliverables / Artifacts from the work accomplished • Federal Programs Handbook policies/procedures • Effectiveness data / evidence
	200 Benefits	☐ Are all types of benefits included in this Object Code? ☐ Who are all these benefits for? ☐ Do the benefits match the personnel in this section?	
	300 Purchased Professional Services	☐ How do the contracted services improve instruction for ELs? ☐ Who is being contracted? ☐ What is the contract cost? ☐ What deliverables does the contract include? ☐ Is the contracted vendor a system employee? ☐ Has SAM been checked, if contract is ≥$25,000? ☐ Is the label the level of effectiveness for this activity/strategy/program in the descriptor?	• Dated/Timed/Signed PD Participants • Signed Periodic Certification • Copy of contract • Federal Programs Handbook policies/procedures • Effectiveness data / evidence • Other documentation as needed

Function	Object	Description Questions Checklist	Title III Documentation
2213 – Instructional Staff Training Activities associated with the professional development and training of instructional personnel. These include such activities as in-service training (including mentor teachers), workshops, conferences, demonstrations, courses for college credit (tuition reimbursement), and other activities related to the ongoing growth and development of instructional personnel. Training that supports the use of technology for instruction should be	**113** Substitute for Teacher	☐ Are the substitutes for teachers attending a Title IIIA-funded PL training? (regular substitutes for ESOL teachers are not allowed in Title IIIA ex. Sick, maternity, medical or personal leave)	• Substitute periodic certification
	114 Substitute for Paraprofessional	☐ Are the substitutes for paraprofessionals attending a Title III training? (regular substitutes for ESOL teachers are not allowed in Title IIIA ex. Sick, maternity, medical or personal leave)	• Substitute periodic certification
	116 PD Stipends	☐ Are these Professional Development Stipends to teachers for participating in an EL-focused Professional Development Course or Workshop? ☐ What is the stipend amount? (reasonable/necessary) ☐ Does the Stipend amount match the District's established stipend written in its Financial Policy?	• Source Documentation (agendas, sign-in sheets, rosters, course completion verification, etc.) for Professional Learning • Federal Programs Handbook policies/procedures
	199 Other Salaries & Compensation	☐ Is this additional compensation for someone providing EL-related professional development to school/district staff? ☐ How many teachers are getting this additional compensation? ☐ What is the hourly rate? ▪ Does the hourly rate match the District's Federal Programs' hourly rate for additional compensation? ☐ How many hours (or days) of additional work does this include? ☐ How does this align with the District's Title IIIA EL-focused PD Plan? ☐ Have we uploaded an informal job/work description? ☐ Did we specify the timeframe for the work? Before school, after school, summer, Saturday school, etc.? ☐ Did we label the level of effectiveness for this activity/strategy/program?	• Informal job description • Time logs • Agendas, Notes, Other documentation • Deliverables / Artifacts from the work accomplished • Federal Programs Handbook policies/procedures • Effectiveness data / evidence
	200 Benefits	☐ Are all types of benefits included in this Object Code? ☐ Who are all these benefits for? ☐ Do the benefits match the personnel in this section?	

included in this code. The incremental costs associated with providing substitute teachers in the classroom (while regular teachers attend training) should be captured in this function code. All costs should be charged to this code regardless of whether training services are provided internally or purchased from external vendors. It should be noted that the salary of a teacher who is attending training would still be reported in function 1000.	**300** Purchased Professional Services	☐ Who is being contracted? ☐ For what are they being contracted? ☐ Has the district checked the suspension/debarment list for federal programs for this company/individual if expense is over $25K with one vendor? ☐ How do these services accomplish the intent and purposes of the grant? ☐ How are these services reasonable & necessary? ☐ Did we label the level of effectiveness?	• P.O.s • Signed Contract • PD Attendance Rosters, Agendas, Handouts • Federal Programs Handbook policies/procedures • Effectiveness data / evidence
	580 Travel	☐ Who is traveling? ☐ Where are they traveling? ☐ What is the conference name? ☐ How does that accomplish the intent/purposes of the grant? ☐ Applicable effectiveness label for the activity/strategy/program (matching EL PD Plan effectiveness label)	• Travel Documentation • Federal Programs Handbook policies/procedures • Effectiveness data / evidence for the larg activity/strategy/program this travel was component of....
	595 Other Purchased Services	☐ Are these purchased services for Title III PD only? ☐ How do these purchased services improve teachers' practice? ☐ What is the purchase cost? ☐ What does that include? ☐ Has SAM been checked, if contract is ≥$25,000? ☐ Applicable effectiveness label for the activity/strategy/program (matching EL PD Plan effectiveness label)	• P.O.s • Dated/Timed/Signed PD Participants • P.O.s or invoices • Service Description • Federal Programs Handbook policies/procedures • Other documentation as needed • Effectiveness data / evidence for the larg activity/strategy/program this travel was component of....
	610 Supplies	☐ What are the supplies to be purchased? ☐ How do they accomplish the intent/purposes of the grant? ☐ Who is using them?	• P.O.s • Internal control processes (only for Title programs) • Federal Programs Handbook policies/procedures

Common Budget Errors: Functions 2210 & 2213 - PD

- ESOL teacher monthly meetings – required for an ESOL program, not Title IIIA
- Title IIIA director's travel to conferences focused on grant administration (GCEL & Summer F.P. Conf), not on instruction of ELs (GATESOL, KSU/ESOL, UGA CLASE) – must be coded in 2230 instead
- Paying for ESOL teachers' travel to conferences funded locally or with other federal funds

Common Budget Errors

- Paying for certifications or PD that was paid for last year with other federal or local funds
- Paying for ESOL teacher training to administer the K-WAPT and WIDA Screener and ACCESS
- Paying Instructional Coaches to administer the ELP screeners & assessments (unless working with participating private schools after contracted hours)
- Paying for ESOL Coaches to work with principals to schedule EL students in ESOL courses

Common Budget Errors: PD Travel

- Unreasonable/unnecessary/excessive travel expenses: lodging, meals per diem, taxi fees, flight upgrades, etc.
- Not following Federal Programs and state guidelines
- Traveling to a non-EL-focused PD activity

Function Codes for the Supplemental Language Instruction Program

Georgia Department of Education
FY20 Title III Chart of Accounts

	A	B	C	D	E	F	G	H
1	Object Codes	1000 Instruction	2100 Pupil Services & Family Engagement	2210 Improvement of Instructional Services.	2213 Instructional Staff Training	2230 General Administration	2300 Audit Cost and Indirect Cost	2700 Student Transportation Services

Answers to Question #2

Answers to Question #4

Answers to Question #3

Answers to Question #3

Answers to Question #2

	Object	Des	
Use s to ion s	**140** Aides and Paraprofessionals	☐ Is the aide or Learners? ☐ Is the p teache ☐ Is the ☐ Wha por ☐ Is th ☐ Do ☐ Did em tim am ☐ Did	☐ Is the level of effectiveness for this labeled in the descriptor?
	199 Other Salaries and Compensation	☐ Who ☐ Is this workin ☐ What is t ☐ Is this rat this type of w ☐ How many hours	

610
Supplies

- ☐ Have we specified the resources, and named them?
- ☐ Have we indicated that these are consumable instructio resources only for ELs' language instruction in the supplemental Title III program (LIEP)?
- ☐ Are these instructional resources that enhance/expand existing language program (ESOL)?
- ☐ Have we explained how other federal funds and/or loca funds provide these supplies for regular ed students?
- ☐ Do these resources benefit the ELs in this grant period?

611
plies, Technology Related
x: flash drives,
itor stands,
iPads below
ization
ld)

- ☐ Do other federal funds and/or local funds provide these technology related supplies/resources for regular ed students?
- ☐ How many will be purchased?
- ☐ What is the "per-unit" cost?
- ☐ Who will use them?
- ☐ Have we mentioned that headsets will or will n ur fo assessment?
- ☐ Does the LEA have inventory procedures t waste & abuse of pilferable items?

ations/We
Based
scriptions &
Licenses

- ☐ What is the name of the instructional softwar
- ☐ How many licenses will be purchased?
- ☐ What's the per unit price (reasonable?)?
- ☐ Do regular education students use this same softwa is the software funded for them?
- ☐ Will only ELs use this software?
- ☐ Is it designed to increase the academic English language proficiency of English Learners?
- ☐ What is the subscription year for these licenses? (It mus benefit the ELs in this grant period)
- ☐ Has the level of effectiveness for these interventions be labeled?
- ☐ Has it been effective with your EL students?

nglish

	615 Expendable equipment	☐ Do regular education students use this same resource? How is it purchased for them? ☐ What is the "per-unit" cost? ☐ Who will be using them? Will only ELs use these electronic devices? ☐ How is it reasonable & necessary? ☐ Does the LEA have inventory procedures to prevent fraud, waste & abuse of pilferable items?	• P.O.s • Signed/dated yearly inventory review • Internal control processes (only for EL use in the Title III program) • Inventory processes • Federal Programs Handbook policies/procedures
	616 Expendable Computer Equipment (ex: Chromebooks)	☐ How many computers? Printers? ☐ What is the per unit cost? ☐ How is it reasonable & necessary? ☐ Who will be using them? ▪ Will only ELs use this expendable equipment? ☐ Do regular education students receive these items through local or other federal funding sources? ☐ Does the LEA have inventory procedures to prevent fraud, waste & abuse of pilferable items?	• P.O.s • Internal control processes (only for EL use in the Title III program – district designed) • Signed/dated yearly inventory review • Inventory processes • Federal Programs Handbook policies/procedures
	641 Textbooks (Printed)	☐ Are these supplemental textbooks (i.e. the District has already purchased ESOL textbooks)? ☐ Are they designed to increase the academic English language proficiency of English Learners? Are they effective in doing so? ☐ What is the name of the books and/or the vendor? ☐ How many will be purchased? ☐ What is the per unit cost? (to demonstrate reasonableness)	• P.O.s • Internal control processes (only for EL use in the Title III program – district designed) • Federal Programs Handbook policies/procedures
	642 Books (other than textbooks) and Periodicals	☐ Are these print resources other than textbooks? ☐ Are these resources supplemental to the LEA's ESOL program? ☐ What are they? (Name them) ☐ How will they be used? ☐ How many will be purchased? ☐ What is the per unit price?	• P.O.s • Documentation that supports the supplemental nature of the purchased resources • Internal control processes (only for EL use in the Title III program – district designed) • Federal Programs Handbook policies/procedures •

Function	Object	Description Questions Checklist	Title III Documen
2700 - Transportation	**180** Bus Drivers	☐ Where are the bus drivers taking the students? ☐ Which students? ☐ Why? ☐ How many hours? Hourly rate? ☐ Has the Field Trip Form been completed & uploaded, and pre-approved? ☐ Has the summer school been approved? ☐ Is the cost reasonable & necessary? ☐ Is this activity split-funded with other federal programs? ▪ If so, does this cost represent the share of EL population in the activity?	• Bus driver periodic cer • Field Trip Forms in Co Attachment • List of EL students par activity requiring tran • Evidence that these El represent the same sh activity that is indicate transportation costs.
	519 Student Transportation Purchased from Another LUA	☐ Why are the student transportation services purchased from other sources? ☐ What are the sources? ☐ How do they support the Title III language programs? ☐ How is this reasonable & necessary?	• Contracts • Date/Time services rer • Description of services
	595 Other Purchased Services	☐ What are the other purchased services? ☐ How do they support the Title III language programs? ☐ Are they reasonable & necessary? ☐ Does your district pay one transportation cost or pay the drivers and fuel separately? ☐ Has the Field Trip Form been completed, uploaded, and pre-approved?	• Contracts • Date/Time services rer • Description of services • Federal Programs Han • Approved Field Trip Fo as Attachment • Federal Programs Han
	620 Energy	☐ Transportation bus fuel costs for what? ☐ For whom? ☐ Why? ☐ Are the fuel costs reasonable & necessary? ☐ Has the Field Trip Form been completed, uploaded, and pre-approved?	• Approved Field Trip Fo as Attachment • Federal Programs Han

Common Budget Errors: Function 1000 (LIEP)

- Private School set aside doesn't match the posted equitable services allocation for the private schools
- Purchasing ESOL classroom equipment & supplies
- Not uploading job descriptions (formal & informal per job)
- Not specifying the split-funded sources on job descriptions
- Not including the subscription year for digital language learning resources' licenses

Common Budget Errors: Function 2700 (Transportation)

- When using several federal programs to fund transportation & summer school – not clarifying the share of costs aligned to the share of population
- Paying for ESOL teachers' & ESOL Coordinator's travel from school to school (this is ESOL, not Title IIIA)

Function Code for EL Parent Activities that Enhance the LIEP

Georgia Department of Education
FY20 Title III Chart of Accounts

	A	B	C	D	E	F	G	H
1	Object Codes	1000 Instructio	2100 Pupil Services & Family Engagement	2210 Improvement of Instructional Services.	2213 Instructional Staff Training	2230 General Administration	2300 Audit Cost and Indirect Cost	2700 Student Transportation Services

Answers to Question #2

Answers to Question #4

Answers to Question #3

Answers to Question #3

Answers to Question #2

Description Questions

- ☐ Does this clerical position solely supp programs?
- ☐ Is this position fully or partially funded
- ☐ Is a job description attached that clearly duties for the Title IIIA funded portion?

- ☐ Does the District use local/other state (QB funds to provide a student advisor or couns for English Learners?
- ☐ Will this position be above & beyond the EL c already provided?
- ☐ Will the person in this position only work with E participating in the EL language program?
- ☐ Is this position fully or partially funded?
- ☐ Is a job description attached that clearly shows onl duties for Title IIIA funded portion?

- ☐ Does the District use local/other state (QBE/FTE) or f funds to provide a school social worker specifically for English Learners?

- ☐ How will this position be above & beyond the school social workers already provided?
- ☐ Will the person in this position only work with EL students participating in the Title III language programs?
- Is this position fully or partially funded?
- Is a job description attached that clearly shows only Title IIIA duties for Title IIIA funded portion?

s this a Parent Involvement position supplemental to Title I?
ow?
his position fully funded or split-funded?
, what is the Title III portion and who is paying the other
on?
e Job Description been uploaded?
Title IIIA duties clearly specified in the Title IIIA

ditional compensation for someone working with
providing other services to students?
are these teachers working with?
onal compensation for an employed teacher
ontract hours or a non-employed teacher?
urly pay rate?
te the federally approved district rate per
his type of work?
Or how many days?
s?
n informal job/work description?
neframe for the work? Before school,
Saturday school, etc.?
f effectiveness for this
m?

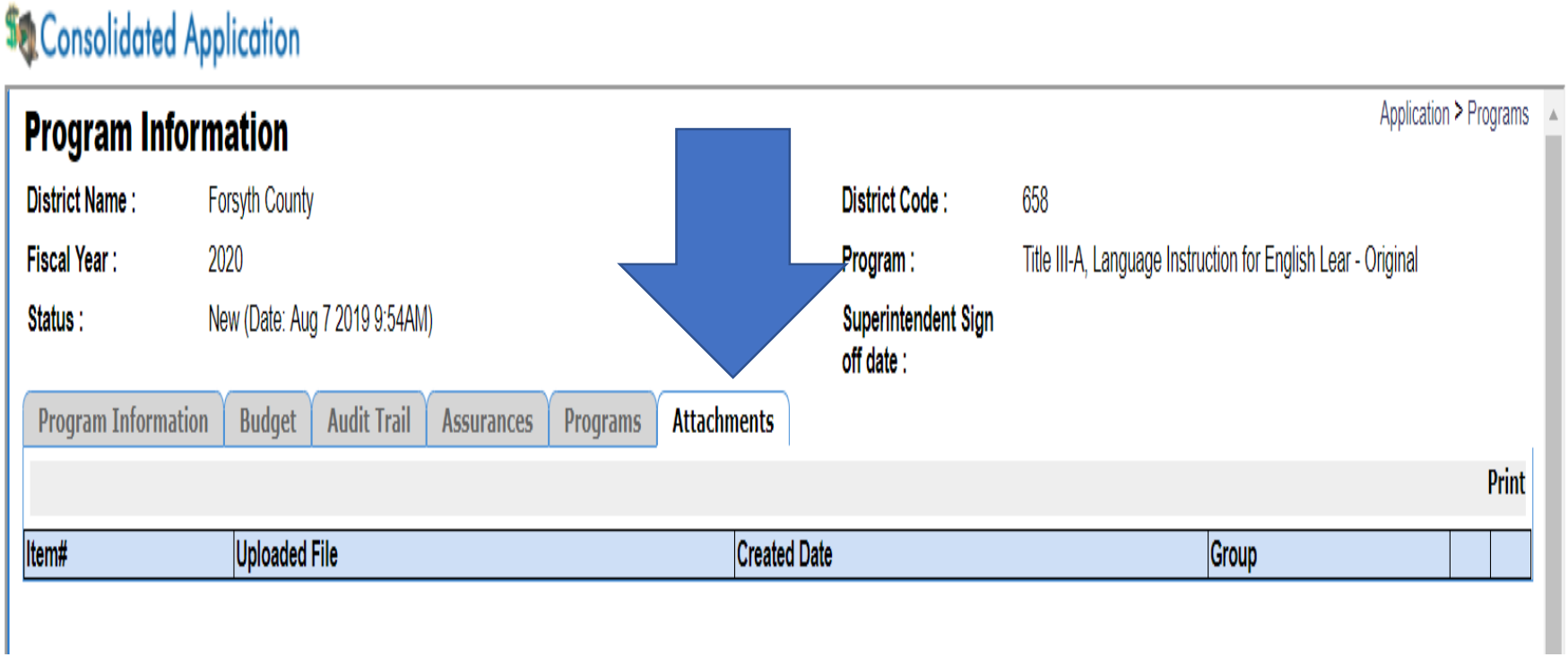
ncluded in this Object Code?
for?
ersonnel in this section?
ia
ntract?

	Contracted Professional Services	☐ What are the deliverables – how many hours of service/training is in the contract? ☐ What is the rate of pay? ☐ Has SAM been checked if the cost is ≥ $25,000? ☐ Is the contracted vendor a system employee or not? ☐ Is the label the level of effectiveness for this activity/strategy/program in the descriptor?	• Parent Sign in sheets for contracted workshops/training • Agendas • Invitations/flyers • Effectiveness data / evidence
	580 District Staff Travel	☐ Who is traveling? ☐ Why are they traveling? ☐ Where are they traveling? (specify) ☐ How is it related to the EL Parent Engagement program? ☐ How does it enhance the Title IIIA LIEP? ☐ Is the label the level of effectiveness for this activity/strategy/program in the descriptor?	• Travel Documentation • Federal Programs Handbook policies/procedures • Effectiveness data / evidence
	610 Supplies	☐ What supplies? Have we specified them? ☐ For which parent engagement program are these supplies? ☐ How are they necessary for the activity/strategy/program? ☐ How are they reasonable & necessary? ☐ If we have participating **private schools**, have we specified the ELP screening & assessment materials for these schools only? ☐ Did we stay within the equitable services allocation amount?	• P.O.s • Internal control processes (only for use in Title IIIA programs) • Federal Programs Handbook policies/procedures
	611 Supplies, Technology Related (ex: flash drives, monitor stands, Kindles, iPads below capitalization threshold)	☐ Do other federal funds and/or local funds provide these technology related supplies/resources for regular ed students? ☐ How many will be purchased? ☐ What is the "per-unit" cost? (reasonableness) ☐ Who will use them? ☐ Why are they necessary?	• P.O.s • Internal control processes (only for use in Title IIIA programs) • Signed/dated annual inventory review • Inventory processes • Federal Programs Handbook policies/procedures
	615 & 616 (expendable equipment / expendable computer equipment)	☐ How many items? ☐ What is the per unit price? ☐ Is it reasonable & necessary? ☐ Who will be using them?	• P.O.s • Internal control processes (only for use in Title IIIA programs) • Inventory processes • Signed/dated annual inventory review

Common Budget Errors: Function 2100 (EL Parent Engagement)

- Funding ESOL parent meetings and/or parent-teacher conferences
- Regular EL parent meetings (Under the ESSA this is a Title IA requirement now – not Title IIIA)
- Translation/interpretation services for regular school communication or Title IA or IDEA program
- Lack of clarity regarding how the parent activities enhance the EL student's supplemental language instruction program

Budget Attachment Tab



OPTIONAL: Effectiveness Template and/or the Logic Model Template for strategies funded under 1000, 2100, 2210, 2213.

1. Formal Job Description(s) for all Title III-funded or partially-funded staff.

2. Informal Description of Title III work coded as additional compensation (Object code 199).

Field Trip Request Form

Title III Budget Attachments

Selecting Evidence-Based Interventions

Page 113 of the Federal Programs Handbook

- LEAs must specify in the budget line item description whether the strategy/intervention is supported by a **strong, moderate, or promising evidence base or demonstrates a rationale** that is documented by a logic model on file with the LEA.
- This requirement applies to these budget function codes: 1000, 2100, 2210, 2213, 2400, 2900.
- Supporting documentation will be reviewed during monitoring visits.

Remember the Federal Programs' Handbook & Budget Webinar!

Identifying the Level of Effectiveness

1. EL Program Plan attachments

May attach a completed Effectiveness Level template or RATIONALE/ Logic Model template, (as needed) for each Title III-funded program/activity.

See Title III website for FY20 templates.

2. Budget line item descriptor(s)

LEA must label the *Level of Effectiveness Evidence* for each strategy, activity and intervention in Functions 1000, 2100, 2210 & 2213 (*Strong, Moderate, Promising, or Logic Model*).

See Federal Program Handbook, Overarching Requirements, **Chapter 9, pp. 117-125.**

Common Budget Errors: Attachments

- None attached, but some needed
- Unclear, incomplete job descriptions
- Split-funded positions unclear which duty aligns with which source fund
- Field Trip Form missing or incomplete
  - Field trip is not language focused for ELs
  - Field trip is not pre-approved
- Indirect Costs Worksheet not attached, when applicable

Common Budget Errors: Effectiveness Label

- Missing
- Incomplete
- Indicating Strong, Moderate, or Promising when no research evidence exists – It should have been Logic Model / Rationale

Ready to Submit the Budget?

- ❑Is the CLIP approved?
- ❑Are all outstanding audit and monitoring findings cleared?
- ❑Are all the EL Program Plan questions answered thoroughly?
- ❑Does the budget align with the Program Plan?
- ❑Does each description in the budget line items give enough detail and clarity to demonstrate federal cost principles (allowable, allocable, necessary, reasonable)?
- ❑Have I used the LEA's negotiated rate for Indirect Costs, if these are being charged to the grant?

Ready to Submit the Budget?

- ❑Are the Function & Object Codes used correctly? (See FY20 Budget tools!)
- ❑Is the set-aside amount for private schools' equitable services equal to the FY20 proportionate share posted on the Ombudsman website (p. 25)?
- ❑Are the necessary attachments uploaded?
- ❑Does the budget include all the information as described in the *Budget Guiding Questions Chart*?

Managing the Expenditure of the Title IIIA Funds

After the Budget is Approved

- Develop a good relationship with your Finance Department!
- Your finance department should enter the budget, as approved by the GaDOE, into the local financial accounting system and update it as budget amendments are submitted and approved.
- Implement approved budget activities within the grant period of performance
- Do not purchase anything that isn't in the approved budget.
- Do not use Title III-A funds to purchase items or services for non-ELs, including those who are not served in ESOL or who have exited EL status and are in the two-year monitoring phase.

After the Budget is Approved (Cont.)

- Spend and draw down your Title III funds in a timely manner. The funds are intended to benefit the current year's students.
- **Best Practice**: Review, sign and date each draw down request prior to submission to the GaDOE. This will provide an extra level of budget monitoring to help you catch possible errors.
- Submit a budget amendment whenever changes are necessary.

After the Budget is Approved (Cont.)

- Title III-A requires that an amendment be submitted whenever there is a change in the budget. For example, if you submitted a budget for after school tutors for $3,000 (1000-199) but later discover that the cost of the tutors will be $3,455, a budget amendment must be submitted.
- Once the amendment has been approved by the GaDOE, share it with your finance department so they can update the budget as entered into the local accounting system.

After the Budget is Approved (Cont.)

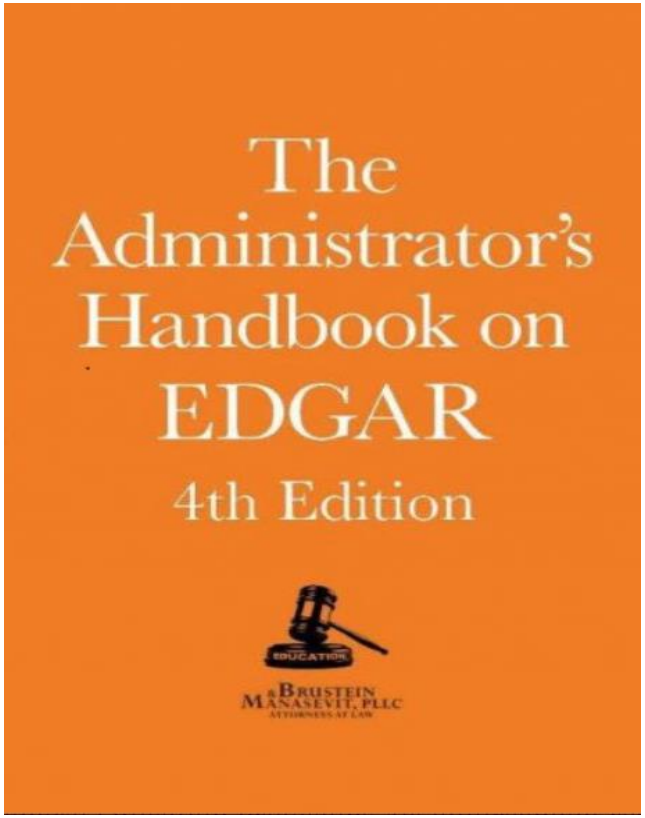
- Request Expenditure Detail reports from your finance office on a regular basis.
  - Review to ensure that expenditures have been coded to the correct function/object codes, as approved by the GaDOE.
  - Review to ensure that expenditures within each function/object code do not exceed the approved budget.
  - If errors are identified, work with your finance office to correct the errors.
  - Remember: The expenditure detail report must match the most recently GaDOE approved budget!

Title III operates much like other Federal Programs

- **Overarching Requirements**
- Alignment to the CLIP
- Financial Management Procedures
- Period of Performance
- Function and Object Codes
- Internal Controls
- Procurement
- Suspension and Debarment
- Inventory Controls
- Time and Effort
- Evidence-based
- Self-monitoring

Uniform Grant Guidance

- The LEA Title III Director is expected to manage Title III expenditures by adhering to the Uniform Grant Guidance in the Administrator's Handbook on EDGAR, 4th Edition (2018).



See 2CFR Part 200!

Internal Controls

- The LEA establishes and implements procedures for ensuring that federal **funds are expended according to program requirements, evaluated, and monitored for effectiveness**, and that **expenditures adhere** to **Federal Cost Principles** as outlined in 2 CFR Part 200, Subpart E.
    1. **Allocable**
    2. **Allowable**
    3. **Necessary**
    4. **Reasonable**

See Title III Program Guide Appendix G!

Supporting Documentation

See Title III Program Guide Appendix F!

- The LEA maintains *Detailed Expenditure Reports* that are organized by funding source, site, function, and object
- LEA maintains financial control
- LEA maintains source documentation for all expenditures:
  - Purchase Orders,
  - invoices,
  - contracts, contract deliverables,
  - subscriptions,
  - agendas,
  - receipts,
  - travel authorizations,
  - pre-approval,
  - tutoring documentation,
  - time-sheets,
  - student sign-in sheets, and
  - administrative costs

Sample Source Documentation

Tutoring	Inventory	Professional Learning
Time & Effort	Procedures & Processes	Evidence of Effectiveness*

See Title III Program Guide

Time & Effort

- Flexibility (pg. 27 in the DOE's Federal Programs Handbook)
- Required for anyone paid with Title III-A funds (including salaried personnel, tutors, bus drivers, substitutes, etc.)
- Twice a year OR once a year as detailed in your district's written procedures (Split Time Logs are monthly)
- Supporting documentation for the activity (tutors, additional compensation, etc.)
- Individual personnel activity record (PAR) signed by employee or supervisor with knowledge of the work performed
- Group PAR signed by supervisor with knowledge of the work performed
- Time logs can be submitted to Title III Director quarterly or monthly, per LEA procedures.

Procurement

Richard Woods,
Georgia's School Superintendent
"Educating Georgia's Future"
gadoe.org

Page 27 of the Federal Programs Handbook

Micro-purchase* (2 CFR §200.67, 48 CFR Subpart 2.1)	Up to $10,000	NEW! *OMB Memo M-18-18*
Small Purchase (2 CFR §200.320)	$10,001 - $250,000	2 price or rate quotations
Simplified Acquisition Threshold* (2 CFR §200.88, 48 CFR Subpart 2.1)	$250,001+	RFP – sealed bids

48 CFR Subpart 2.1 (Definitions) – Updated periodically for inflation

- 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.

Suspension & Debarment

- Non-federal entities are subject to the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR part 180.
- These regulations restrict awards, sub-awards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities.

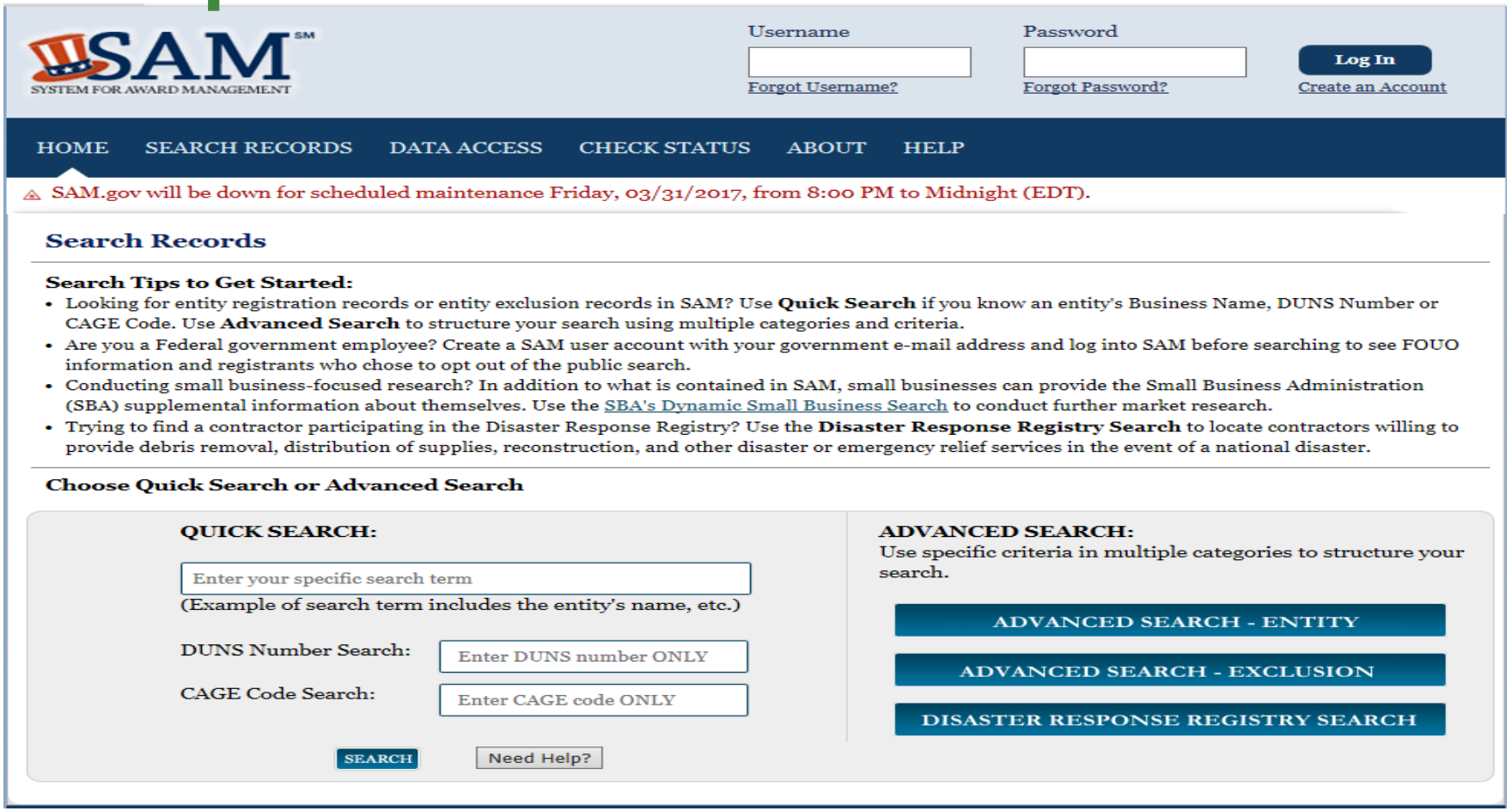
2 CFR §200.213

Suspension & Debarment Cont.

2 CFR 180.220 Procurement contracts included as covered transactions:

- Any contract or subcontract expected to equal or exceed $25,000 must be checked against the System for Award Management (SAM) for suspension or debarment (includes contracted tutors)
- Evidence of the verification can be in the form of a date/time stamped print screen or other digital method that is readily available
- Documentation should include who checked, when it was checked and the query criteria

SAM – Checking Suspension/Debarment



Title III-A Carryover

- Districts are expected to spend 100% of the original Title III-A allocation during the 15-month period of performance, per EL Program Plan.
- After the plan has been implemented, any unexpended funds may be carried over to the next fiscal year and must be 100% expended that year, NO exceptions.
- After the 27 months, any unexpended carryover funds are returned to the GaDOE.
- IF you didn't get an allocation this year, but had one last year, you need to open the Carryover budget from last year in this year's Program Page. And budget the carryover, even though you don't have an allocation this year.

Amendment Process
EDGAR 2 CFR Part 200.308

- After initial budget approval, any transfer of funds from one function or object code to another requires an approved budget amendment
- Must write the word **AMEND Increase** or **AMEND Decrease** **or** **AMEND NEW** in the Budget Line Item Description and specify why the increase or decrease. Budget line items cannot remain the same in an amended section.
- Changes must be supported in the CNA/DIP and align to the EL Program Plan (**NOTE:** You will need to update the EL Program Plan if major changes are made to the original budget!)
- Amendments are subject to a comprehensive review process, including the original budget.
- Amendments may be submitted until the end of the federal fiscal year (Sept. 30).

Title IIIA Completion Report

- Finance office will (most likely) create and submit the Title III-A Completion Report by October 31 of each year.
- **Best Practice:** Review the Completion Report prior to submission. It is very important that there are no over-expenditures in any function/object code area.
  - If you discover over-expenditures, submit a budget amendment before Sept. 30!
  - When the fiscal year closes on September 30, changes cannot be made.
- The Title IIIA Completion Report must match the final, approved amended Title IIIA budget.

Title III-A Program Specialists

Northeast Region	Northwest Region
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Central Region	**South Region**
Ms. Dely Roberts droberts@doe.k12.ga.us 470-421-9976	Ms. Tammie Smith tsmith@doe.k12.ga.us 678-794-3667

Contact Information by Region

EL Language Programs Help Desk

ESOL & Title III, Part A Questions & Support

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