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FY19 Title II, Part A Fall Budget Technical Assistance Webinar

Title II, Part A Education Program Specialists

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Title II, Part A FY19 Fall Budget Webinar GaDOE Specialists




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Title II, Part A FY19 Fall Budget Webinar Agenda



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Veteran and New Coordinators

- Closing Out FY18
- FY19 Budget Entry
- Lessons Learned from FY18
- Updates for FY19

New Coordinators

- Overview of Fundamentals

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Closing Out FY18

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Title II, Part A FY19 Fall Budget Webinar Reminders

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Reminders Closing Out FY18 and Going Into FY19

- FY18 Original Allocations were RESTORED to original July 2017 funding levels THEN ADJUSTED to account for actual enrollment in new and significantly expanding charters.
- LEAs **MUST** complete a FY18 budget amendment prior to September 30, 2018.
- For LEAs who have transferred or consolidated funds – OPTIONAL: Please consider budgeting at the central office level in PD 2213 810. Allow the total to become carryover and then use the funds in FY19 as planned in FY19 CLIP (IIA use, consolidation, and/or transfer)

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Title II, Part A FY19 Fall Budget Webinar Reminders

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Reminders Closing Out FY18 and Going Into FY19

- Review FY18 expenditures for allowability prior to closing out the year
- Charges to the grant are allowable and align with the ESSA PL Definition.
- Participants who receive professional learning are allowable under ESSA.
- Charges that have been reclassified into Title II, Part A are supported by source documentation.
- Drawdowns match expenditures and adjustments made if needed

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Title II, Part A FY19 Fall Budget Webinar  **Reminders**

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Reminders Closing Out FY18 and Going Into FY19

- If your LEA transferred funds, ensure your LEA has drawn down the total amount transferred
- Review the FY18 completion report prior to submission for accuracy. The FY18 completion report is due on or before October 31, 2018. New charters in FY18 requiring assistance should reach out early to Grants Accounting for support.
- Review FY18 source documentation to complete column 8 of the FY18 Title II, Part A Budget Attachment: Effectiveness for upload with the FY19 Budget

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Title II, Part A FY19 Fall Budget Webinar  **FY18 Budget Attachment: Effectiveness**


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Title II, Part A FY19 Budget Attachment: Effectiveness
Upload to Consolidated Application Attachments Tab
Due October 1, 2017 (required prior to Budget Approval)


Directions:
The Georgia Department of Education requires local education agencies (LEAs) to determine the effectiveness of Title II, Part A funded activities (201A Section 230(a)(2) and 2 CFR 200.301).
• The FY18 Title II, Part A Budget Attachment: Effectiveness below must be completed (Columns 1-7) for each Title II, Part A funded strategy/action step. The FY18 Title II, Part A Budget Attachment: Effectiveness must be uploaded to the Consolidated Application with the FY18 Title II, Part A Budget.
• Columns 8, Effectiveness & Next Steps, to be completed at the end of FY18. The completed FY18 Title II, Part A Budget Attachment: Effectiveness (Columns 1-8) must be uploaded to the Consolidated Application with the FY19 Title II, Part A Budget. The data and analysis of data supporting the effectiveness described in Column 8 must be maintained in the LEA files.

Fiscal Year	LEA Name	LEA Condition
Column 1 Strategy/Action Step	Column 2 Title II, Part A Funded Strategy/Action Step	Column 3 Priority Needs
Column 4 Under which federal use of funds is the strategy/action step implemented? (See 201A)	Column 5 • Funding • Milestone • Priorities (See 201A)(2)	Column 6 • Evidence Based • Research • Responsible for Collecting, Coordinating and Analyzing Data
Column 7 Responsible for Collecting, Coordinating and Analyzing Data	Column 8 Effectiveness & Next Steps	Effectiveness & Next Steps

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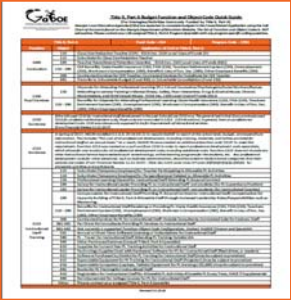
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FY19 Budget Entry



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Title II, Part A FY19 Fall Budget Webinar
Title II, Part A Budget Code Quick Guide



UPDATED
for
FY19

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Budget Code 2213

Function 2213

Is the professional development cost for instructional staff?

YES

NO

Code costs to Function 2213

Code costs to same functional category as employee's salary

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Title II, Part A FY19 Fall Budget Webinar
Budget Review Checklist

TITLE II, PART A
FY19 BUDGET REVIEW CHECKLIST

LEA Name: _____


Program/Initiative	Agreement	Revision	N/A	Status	Original Budget Comments
100% CONSOLIDATION (Fund 150, 1000 881) 100% CONSOLIDATION (Fund 400, 1000 881) 100% Funds used for consolidation - No private schools participate in equitable services. Example: Completed CAP, Privatization of funds, intents and purposes. For Fund 400, specialists must review unsubmitted schools budget before approving Title II, Part A Budget. PARTIAL CONSOLIDATION (Fund 150 or Fund 400) Funds used for consolidation and LEA initiatives. Example: All budget checklist items for LEA initiatives.	Schools & Programs Selected <input type="checkbox"/> Schools/Programs Available <input type="checkbox"/>	Schools & Programs Not Selected <input type="checkbox"/> Schools/Programs Budget Not Completed <input type="checkbox"/>	<input type="checkbox"/>	Fund 150 <input type="checkbox"/> Fund 400 <input type="checkbox"/>	
CONSOLIDATED ADMINISTRATION (2230 882) - Less than or equal to 10% for administrative activities for Title II, Part A, consolidated for administrative purposes. Costs must be reasonable, necessary, allocable under one or more of the following: 1) The Consolidation of LEA Administrative Funds; LEA Level Form has been uploaded in the	Document Uploaded <input type="checkbox"/>	Document Not Uploaded <input type="checkbox"/>	<input type="checkbox"/>	Review <input type="checkbox"/>	

<http://www.gadoe.org/School-improvement/Teacher-and-Leader-Effectiveness/Pages/LA-Resources.aspx>

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Budget Attachment: Class Size Reduction (CSR)




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Using Title II, Part A to Support Class Size Reduction

- Class Size Reduction is one of many strategies an LEA might implement to address needs in student academic achievement.
- Class Size Reduction as a strategy has conflicting findings about effectiveness. LEAs must do their research to find a study consistent with their planned implementation.
- Title II, Part A funds used to implement CSR must supplement non-federal funds that would otherwise be used to reduce class size.

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Title II, Part A FY19 Fall Budget Webinar
Budget Attachment: Class Size Reduction (CSR)




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- CSR Teachers must be supplemental to those required by State Board rule 160-5-1-.08, Class Size, or class size maximum officially established by Charter LEAs or Strategic Waiver School Systems
- Documentation (submitted as attachments in the Consolidated Application) to verify Title II, Part A funds expended to reduce class size are supplementing non-federal funds
 - FY19 Class Size Reduction Workbook
 - Appropriate worksheet (Self-Contained Classes or Departmentalized Classes) completed for each school implementing CSR
 - Master schedule in *chart format* for schools implementing CSR
 - Title II, Part A – elementary, middle, and high schools
- Official verification of LEA established class size maximums (2018-19) for Charter LEAs and Strategic School Waiver Systems

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Title II, Part A FY19 Fall Budget Webinar
Budget Attachment: Class Size Reduction (CSR)




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School District Name		School Year		School Name		First Semester		Second Semester			
Grade	Course	LEA Maximum Class Size	Total Number of Students Enrolled in Course	Total Instructional Segments Required to meet LEA Maximum Class Size	Instructional Segments Filled With State or Local Funds	Average Instructional Segment Size Before Reducing Class Size with Federal Funds	Number of non-Federally Funded Instructional Segments	Additional Instructional Segments Filled with Federal Funds	Total Number of Instructional Segments (State/Local Funded + Federal Funded)	Fiscal Average Segment Size	Number of Instructional Segments Funded by Title I
			4200/02	4200/02	4200/02	4200/02	0	0	4200/02	4200/02	0
			4200/02	4200/02	4200/02	4200/02	0	0	4200/02	4200/02	0
			4200/02	4200/02	4200/02	4200/02	0	0	4200/02	4200/02	0
			4200/02	4200/02	4200/02	4200/02	0	0	4200/02	4200/02	0
			4200/02	4200/02	4200/02	4200/02	0	0	4200/02	4200/02	0

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Budget Attachment: Class Size Reduction (CSR)



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Master schedule in *chart format** must include :

- Daily schedule - Grouped
- Teacher name/ classes highlighted
- For each class
 - Grade Level/ Subject
 - # of Students Enrolled
 - Total
 - Total By Delivery Model
 - Regular
 - Gifted
 - Special Education
 - EIP
 - REP



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Title II, Part A FY19 Fall Budget Webinar
Title II, Part A Funded Job Descriptions




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4 ATTACHMENT(D): FY19 Title II, Part A FUNDED POSITIONS
 If applicable, job descriptions for all FY19 Title II, Part A funded positions (except CSR teachers) are uploaded in the attachment tab of the Consolidated Application prior to budget approval. The percent of the position funded is included in the budget description. (See Job Description Checklist below for criteria.)

FY19 Title II, Part A Funded Positions		Job 1 Title	Job 2 Title	Job 3 Title	Job 4 Title	Job 5 Title	
Title of Position							
Percent Funded							
Description Attached	<input type="checkbox"/>	Description Attached	<input type="checkbox"/>	Description Attached	<input type="checkbox"/>	Description Attached	<input type="checkbox"/>
Position Approved	<input type="checkbox"/>	Position Approved	<input type="checkbox"/>	Position Approved	<input type="checkbox"/>	Position Approved	<input type="checkbox"/>
Revision Required	<input type="checkbox"/>	Revision Required	<input type="checkbox"/>	Revision Required	<input type="checkbox"/>	Revision Required	<input type="checkbox"/>

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Administrative Costs



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TITLE II, PART A
 FY19 BUDGET REVIEW CHECKLIST

Requirement	Approve	Revise	N/A	Status	Original Budget Comments
ADMINISTRATIVE COSTS If budgeted, LEA-budgeted amounts for administrative costs do not exceed 10% of the original grant amount. If costs exceed 10%, the LEA has uploaded a justification for why the amount is reasonable and necessary in the Attachments Tab of ConApp. Administrative costs include all costs in function codes 2230 and 2300 and should not be charged to other function codes.	Less than 10% <input type="checkbox"/> 10% with justification <input type="checkbox"/>	Revise amount reserved or uploaded justification <input type="checkbox"/>	Not budgeted or not <input type="checkbox"/>		Administrative costs for Title II, Part A include ALL costs in function codes 2230 and 2300.

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Lessons Learned from FY18

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Lessons from FY18 Title II, Part A Monitoring

- Lack of appropriate Source Documentation
 - PL (sign-in sheets, agendas, certificate of completion, etc.)
 - Travel (hotel receipts, meeting agendas, per diem, etc.)
- Travel Allowability – State and LEA Policies/Procedures
- Unallowable Title II, Part A expenses (participants)
- Mismatch between expenditure detail reports, drawdown submissions and completion reports
- Internal Controls
 - Partial, unorganized written procedures
 - Written procedures not being followed
 - Lack of communication about written procedures
- Clear connection between needs, budget, expenditures

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Coordination of Funds

- Consolidation -Fund 400 (ESSA Section 8203)
 - 2 LEAs
- Consolidation -GaDOE Pilot – Fund 150
 - 9 LEAs
- Transfer of Funds (ESSA Section 5103)
 - Transfer In – 5 LEAs
 - Transfer Out – 20 LEAs

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Coordination of Funds



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- **Before transferring...**
 - **Ensure that the LEA can spend 100% of transferred funds**
 - Funds transferred to another program cannot be transferred back
 - Funds transferred to another program are subject to the set-asides of the program into which the funds are transferred
 - Funds transferred to another program are subject to the carryover limitations of the program into which the funds are transferred


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SCENARIO	ALLOCATION	REMAINING	CARRYOVER
Funds Remain in IIA	\$25,000	\$5,000	\$5,000
Funds Transferred to Title I	\$75,000 T1 (\$25,000 from IIA)	\$15,000	Title I C/D 15% \$11,250 T1 \$0 - T2
Funds Consolidated No Transfer	\$50,000 T1 50% \$25,000 T2 25% \$25,000 T4 25%	\$20,000 \$10,000 - T1 50% \$5,000 - T2 25% \$5,000 - T4 25%	Title I 15% Limit \$7,500 - T1 \$5,000 - T2 \$5,000 - T4
Funds Consolidated After Transfer (IIA to IA)	\$75,000 T1 75% \$25,000 T4 25%	\$30,000 \$15,000 - T1 75% \$5,000 - T4 25%	Title I 15% Limit \$11,250 - T1 \$0 - T2 \$5,000 - T4

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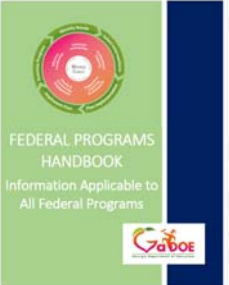
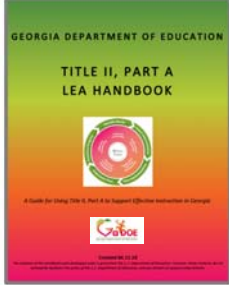
Updates for FY19

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New Overarching & Program Guidance




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New Publication on Evidence-Based Strategies



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Also available in Chapter 9 of the
 Federal Programs Handbook



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Sample Logic Model		USA Number			
Year	Intervention	Short-Term Outcomes	Medium-Term Outcomes	Long-Term Outcomes	Impact

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Working with Private Schools




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- More private schools than ever are joining the program and, while they are able to participate in more Use of Funds, all expenditures must meet Use of Funds, PL Definition and be based on Student Needs.
- Sharing required information
- Online Forms
- Change in Submission Dates
- *Non-Profit Status* - Can be searched online
- *Enrollment* - as of October 2, 2018
- *Geographic Location*

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Title II, Part A FY19 Fall Budget Webinar
Determining Private School Participation



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Equitable Services and Private School, Nonprofit Status

The Department of Education is pleased to announce that the Department will be providing equitable services to private schools that are eligible for Title II, Part A funding. This funding is available to private schools that are eligible for Title II, Part A funding.


How to Demonstrate Nonprofit Status

Private schools may be demonstrating one of the following:

- 1. The school is a 501(c)(3) nonprofit organization.
- 2. The school is a 501(c)(6) nonprofit organization.
- 3. The school is a 501(c)(29) nonprofit organization.
- 4. The school is a 501(c)(28) nonprofit organization.
- 5. The school is a 501(c)(27) nonprofit organization.
- 6. The school is a 501(c)(26) nonprofit organization.
- 7. The school is a 501(c)(25) nonprofit organization.
- 8. The school is a 501(c)(24) nonprofit organization.
- 9. The school is a 501(c)(23) nonprofit organization.
- 10. The school is a 501(c)(22) nonprofit organization.
- 11. The school is a 501(c)(21) nonprofit organization.
- 12. The school is a 501(c)(20) nonprofit organization.
- 13. The school is a 501(c)(19) nonprofit organization.
- 14. The school is a 501(c)(18) nonprofit organization.
- 15. The school is a 501(c)(17) nonprofit organization.
- 16. The school is a 501(c)(16) nonprofit organization.
- 17. The school is a 501(c)(15) nonprofit organization.
- 18. The school is a 501(c)(14) nonprofit organization.
- 19. The school is a 501(c)(13) nonprofit organization.
- 20. The school is a 501(c)(12) nonprofit organization.
- 21. The school is a 501(c)(11) nonprofit organization.
- 22. The school is a 501(c)(10) nonprofit organization.
- 23. The school is a 501(c)(9) nonprofit organization.
- 24. The school is a 501(c)(8) nonprofit organization.
- 25. The school is a 501(c)(7) nonprofit organization.
- 26. The school is a 501(c)(6) nonprofit organization.
- 27. The school is a 501(c)(5) nonprofit organization.
- 28. The school is a 501(c)(4) nonprofit organization.
- 29. The school is a 501(c)(3) nonprofit organization.

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Determining Private School Participation



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Working with Private Schools




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- Equitable Services Meetings in Fall (9:00-3:00)
 - October 25 – Fulton County
 - October 26 – Walton County
 - October 31 – Archdiocese of Atlanta
 - November 1 – Cherokee County
 - November 6 – Mitchell County
 - November 7 – Coffee County
 - November 8 – Houston County
 - November 9 – Savannah-Chatham
 - November 16 – CSRA RESA

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Title II, Part A FY19 Fall Budget Webinar
Updates to Internal Controls



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Procurement Level Updates for FY19

Methods of Procurement	Thresholds
Micro-purchase* (2 CFR §200.67, 48 CFR Subpart 2.1)	Up to \$10,000
Small Purchase (2 CFR §200.320)	\$10,001 to \$250,000
Simplified Acquisition Threshold* (2 CFR §200.88, 48 CFR Subpart 2.1)	\$250,000+

*48 CFR, Volume 1, Chapter 1, Subpart 2.1 (Definitions) – Updated periodically for inflation

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Title II, Part A FY19 Fall Budget Webinar
Procurement – Chapter 4 of FP Handbook



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UPDATES


- GaDOE has clarified with the US Office of Management and Budget that 'aggregate', as it applies to micro-purchases, means aggregate in a single purchase.

REMINDERS

- To the extent practicable, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers.
- FY18 Controls will apply to FY18 Expenditures; FY19 Controls will apply to FY19 Expenditures

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Title II, Part A FY19 Fall Budget Webinar
FY19 Monitoring Updates



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UPDATES

- Monitoring Cycle was updated to reflect districts in the Consolidation of Funds Pilot
- Superintendents have been notified of FY19 Monitoring
- FY19 Monitoring Document is available online – It may still be subject to minor updates
- FY19 Federal Programs Monitoring Webinar – Aug. 21.
- FY19 Title II, Part A Monitoring Trainings have been scheduled for the week of August 27.

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Title II, Part A FY19 Fall Budget Webinar
Title II, Part A Training Sessions



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Regional Training Structure

1 Hr - CFM Equity/ PQ/ Data Validation/ PLP PLGs


2 Hrs - CFM Title II, Part A

1.5 Hrs New Title II, Part A Coordinators Q & A

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Title II, Part A Training Sessions




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Monitoring and New Coordinators

- Tuesday, August 28, 2018 - Regional
 - GaDOE – Atlanta
 - Pioneer RESA – Cleveland
 - Liberty County Performing Arts Center – Hinesville
 - Dougherty County Schools Board Room- Albany
- Wednesday, August 29, 2018 - Regional
 - Twiggs County BOE – Jeffersonville
 - Dalton Public School Annex at City Park – Dalton


Regional Registration: <https://goo.gl/forms/Xadf3eY6ADqIm6022>



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Title II, Part A FY19 Fall Budget Webinar
Title II, Part A Training Sessions



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 2017-2018

• Wednesday, September 5, 2018 – Webinar

- 9:00-10:00 CFM Equity/ PQ/ Data Validation/ PLP PLGs
<https://attendee.gotowebinar.com/register/610758210681272835>
- 10:30-12:30 CFM Title II, Part A
<https://attendee.gotowebinar.com/register/9163487528220412163>
- 1:30-3:00 New Title II, Part A Coordinators Q & A
<https://attendee.gotowebinar.com/register/1207152009284747267>

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Overview of Fundamentals

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Fiscal Topics

- Purpose
- GAN/Allocations
- Internal Controls
 - Procurement
 - Sole Source
 - Suspension and Debarment
 - Drawdowns
 - Supplement not Supplant
 - Period of Performance
 - Time and Effort
- Source documentation
- Private Schools
- Flexibility
- Definitions
- Program Allowability
- Items of Cost

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Title II, Part A FY19 Fall Budget Webinar
ESSA GAN/ Allocations

Budget & Effectiveness

- LINK: GaDOE Portal Login (Login/ Password Required)

FY18 Title II, Part A Allocation


- FY18 Title II, Part A Budget Allocations - Original/Original Data (08.16.2017)
- FY18 Title II, Part A Budget Allocations - Recalculation/Updated Data (10.16.2017)
- FY18 Title II, Part A Budget Allocations - Adjusted (07.27.18)
- FY18 Indirect Cost Rates (06.2017)

FY19 Title II, Part A Allocation

- FY19 Title II, Part A Budget Allocations - Projections (06.08.18)
- FY19 Title II, Part A Budget Allocations - Original (08.01.18)
- FY19 Indirect Cost Rates (03.2019)

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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.

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Internal Controls – Chapter 4 of FP Handbook




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- §200.61-62 Establish and maintain effective internal control over the federal award that provides reasonable assurance that the non-federal entity is managing the federal award in compliance with federal statutes, regulations, and the terms and conditions of the federal award.
- Internal control is “a process, effected by a LEA’s management personnel, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:
 - Effectiveness and efficiency of operations
 - Reliability of financial reporting
 - Compliance with applicable laws and regulations”

Standards for Internal Control in the Federal Government, GAO-14-794G - 09.10.2014

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2 CFR Part 200 Required Procedures – Chapter 4 of FP Handbook



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Which internal controls need to be in writing?

Written policies and procedures:

- Cash Management Procedures - §200.302(b)(6) and §200.305
- Allowability Procedures - §200.302(b)(7)
- Equipment Management Procedures § 200.313(d)
- Conflict of Interest Policy - §200.318(c)
- Procurement Procedures (specific levels) - §200.319(c)
- Procurement: Competitive Proposals - Method for Conducting Technical Evaluations of Proposals and Selecting Recipients - §200.320(d)(3)
- Compensation – Personal Services (Time and Effort) §200.430
- Travel Policy - §200.474(b)
- Segregation of Duties §200.303(a)

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Internal Controls Quick Guide



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Title II, Part A Internal Controls Quick Guide
Internal Controls for Program Implementation and Compliance

Recommended & Required Internal Controls for LEA


** The 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.

Cost Principles

Allowability	2 CFR §§200.302(b)(7), 200.403(a) The LEA must have written procedures to review any expenditures charged to the grant to ensure they are necessary, reasonable and allocable.
Supplemental Use of Funds	ESEA Sec. 2123(b) The LEA must ensure all expenditures are supplemental in nature.
Source Documentation	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.

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Title II, Part A FY19 Fall Budget Webinar
Procurement - FP Handbook Chapter 4



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 Georgia's School Superintendent
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Are you familiar with procurement levels?


Methods of Procurement	Thresholds	Requirements
Micro-purchase* (2 CFR §200.67, 48 CFR Subpart 2.1)	Up to \$10,000	
Small Purchase (2 CFR §200.320)	\$10,001 to \$250,000	2 price or rate quotations
Simplified Acquisition Threshold* (2 CFR §200.88, 48 CFR Subpart 2.1)	\$250,000+	RFP – sealed bids

*48 CFR, Volume 1, Chapter 1, 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.

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Title II, Part A FY19 Fall Budget Webinar
Procurement – Sole Source - FP Handbook Chapter 4



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Did you know that it is not uncommon for a LEA to Sole Source a purchase when they shouldn't?


Noncompetitive Proposals (2 CFR 200.320(f))
 Procurement through solicitation of a proposal from only one source and may be used ONLY when one or more of the following circumstances apply:

- The item is available only from a single source;
- The public emergency for the requirement will not permit a delay resulting from competitive solicitation;
- The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to written requests from nonfederal entity; or
- After soliciting a number of sources, competition is determined inadequate.

Sole Sourcing Should Be Limited!
 Sole source letters from vendors are problematic.

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Title II, Part A FY19 Fall Budget Webinar
Suspension and Debarment - FP Handbook Chapter 4



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Are you keeping track of suspension and debarment verification from sam.gov?

2 CFR §200.213


- Non-federal entities are subject to the non-procurement debarment and suspension regulations implementing 2 CFR part 180 and Executive Orders 12549 and 12689.
- 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 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)


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Title II, Part A FY19 Fall Budget Webinar
GaDOE Guidance on Drawdown of Federal Funds
§200.305(b) - FP Handbook Chapter 4



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What is your role in requesting Grant Drawdowns?



- Read the GaDOE Position Paper.
- Review LEA internal controls.
- Review and authorize grant drawdowns prior to the LEA finance officer request for funds.
- Make appropriate adjustments during each drawdown.

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Title II, Part A FY19 Fall Budget Webinar
Supplement Not Supplant - FP Handbook Chapter 4




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How do you know when you are supplanting?

- 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 or not 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 is supplanting.
 - Were state or local funds used in the past year to pay for the program or activity? If they were, it is supplanting.

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Title II, Part A FY19 Fall Budget Webinar
Period of Performance - FP Handbook Chapter 4



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How does the period of performance relate to purchases?

- Period of Performance
 - Original - July 1, 2018-September 30, 2019 (15 months)
 - Carryover – October 1, 2019-September 30, 2020 (12 months)
- Reminders:
 - Contracts/ licenses must benefit the current fiscal year.
 - Multi-year contracts/ licenses that extend beyond the period of performance are allowable.
 - Multi-year contracts and licenses should include language clarifying "pending funding availability".
 - LEAs must continue to receive contract deliverables prior to payment.
 - It is a best practice to align contracts/ licenses to period of performance.

See the Federal Programs Handbook for more information

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Title II, Part A FY19 Fall Budget Webinar
Period of Performance Flexibility - FP Handbook Chapter 4
(2 CFR §200.77, 200.309, 200.403(g); 34 CFR §76.707)



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The intent of federal funds is to benefit students, teachers and school leaders in that fiscal year through the grant period as indicated on the Grant Award Notice (GAN). Regarding purchases that cross grant periods (software, computers, equipment), GaDOE is providing flexibility as follows:

- Purchases may extend beyond one year to take advantage of cost reductions, IF the students, teachers and school leaders in the current fiscal year receive benefit from the purchase.
- Leases and licenses – If instructional software subscriptions are purchased after January, the LEA will need to provide explanation within the budget description indicating how students in the current fiscal year will benefit from the purchase. Professional Learning and/or recruitment software and/or licensing do not require an explanation within the budget description.
- PL Registration – To maximize cost efficiency, LEAs may take advantage of early bird professional development registration where early bird registration occurs in the original grant period and the actual professional development occurs in the carryover period. Supporting documentation should be kept on file.

In general and to reduce risk of non-compliance, GaDOE strongly advises that LEAs align all purchases to the original grant period as much as possible. GaDOE recognizes that each purchase is circumstantial and encourages LEAs to carefully plan purchases weighing all options and maximizing benefits to LEA students and staffs as good stewards of taxpayer dollars.

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Title II, Part A FY19 Fall Budget Webinar
Time and Effort Updates – Chapter 4 of FP Handbook



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Do staff have to fill something out at the end of the year?


- All Federal Programs are following Education Law Firm Brustein and Manasevit's recommendations for easing the burden of reporting while staying in compliance.
 - Periodic Certification – Single Cost Objective LEA staff/ supervisors may complete annually
 - Personnel Activity Report (PAR) – Multiple Cost Objectives LEA staff/ supervisors may complete quarterly

LEAs must follow their existing internal controls or modify internal controls to new guidance.

- **Title II, Part A Only** – Teachers who also serve as mentors may complete work during the school day. The submission of a mentor job description should illustrate that the work is above and beyond what is required of the contracted position. (Periodic Certification)

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Title II, Part A FY19 Fall Budget Webinar
FY19 Title II, Part A Private School Allocations
– Chapter 5 of FP Handbook




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What do I need to know about private schools?

- The number of participating private schools has increased.
- New resources and updated guidance can be found on the ombudsman webpage.
- According to law and fiscal guidance, budgeted costs for total public and private grant administration **MUST** be determined in consultation with private schools. Even if a LEA doesn't believe it is reserving money, if the LEA reserves administrative funds and provides equitable services, there is some associated cost.

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Title II, Part A FY19 Fall Budget Webinar
FY19 Title II, Part A Private School Allocations
– Chapter 5 of FP Handbook




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What do I need to know about private schools?

- All information about LEA allocations and budget should be made available to private schools upon request.
- In Georgia, Title II, Part A asks that LEAs limit the use of administrative funds to 10%. Any LEAs wishing to use more than 10% must submit documentation describing how the funds will be used with a justification for how this amount is reasonable and necessary.
- **LEAs with participating private schools MUST upload a budget attachment** showing the totals allocated to private schools. This required template can be found on the Title II, Part A webpage.
- Someone in the LEA will use the Private School application in the MyGaDOE portal to update private school information. You should have access.

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Title II, Part A FY19 Fall Budget Webinar
Private Schools – Chapter 5 of FP Handbook



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What are examples of administrative activities?

- A portion of Title II, Part A allocations for the private school may be directed to the LEA for administrative services.
- Title II, Part A limits administrative costs to 10% of the grant (**includes any budgeted items in Functions 2230 and 2300 for Title II, Part A**). Administrative costs over 10% require justification.
- LEAs and private schools must consult and agree on administrative costs.


Possible Administrative Activities

- Grant management
- Processing purchase orders
- Conference registrations
- Negotiating contracts – 3rd party
- Conducting meetings
- Accounting activities
- Collecting travel documentation
- Processing reimbursements
- File maintenance
- Onsite inventory of equipment
- Program implementation and monitoring

How can my budget impact private schools?

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Redesigned Teacher Resource Link #GATeacherResources



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One-stop shop for teachers!


Georgia's Redesigned Teacher Resource Link

How can teachers access the Redesigned TRL?

Teachers access the Redesigned Teacher Resource Link by clicking on the TRL tab within SEDS.

	COHERENT INSTRUCTIONAL RESOURCES	More than 28,000 K-12 downloadable resources
	CONTENT	Essential Toolkit K-5 resources includes: curriculum maps, frameworks, glossaries, and teacher guidance documents
	QUALITY	Instructional resources align to state standards & focus on grade level or resource type
	SHOPPING CART OF RESOURCES	User-friendly search menu, filtered resources to store, save, & share.

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FY19 Title II, Part A Fall Budget Technical Assistance Webinar

Title II, Part A Education Program Specialists

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