



TITLE I PROGRAM DIRECTORS TRAINING

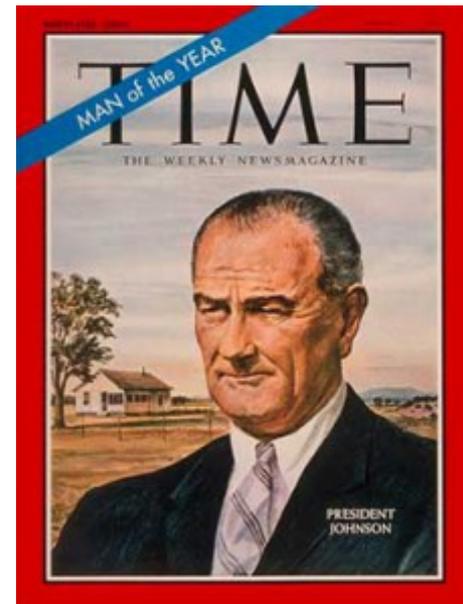
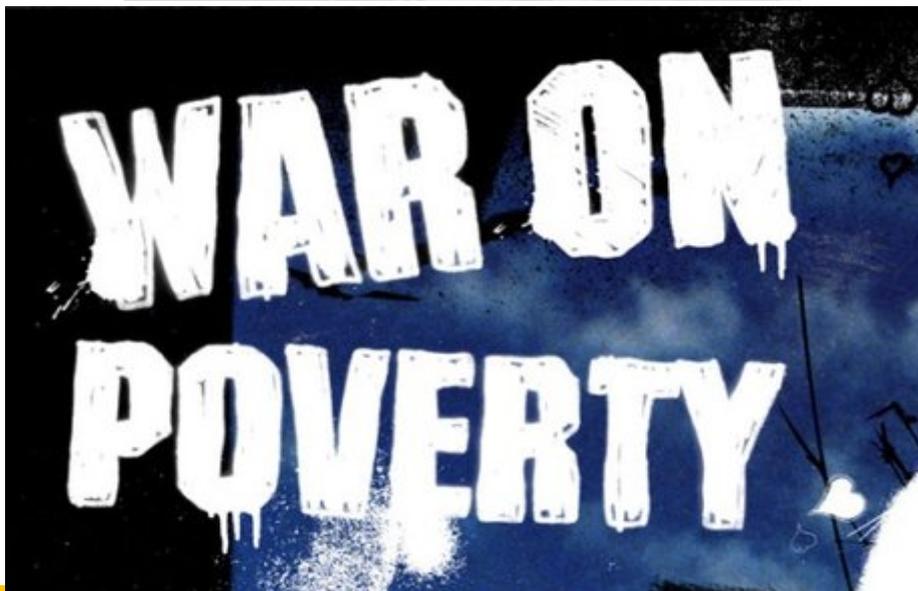


Developed by the Office of Supplemental Educational Programs



WAR on POVERTY: 50 Years Later...

WAR ON POVERTY
50
Years





WAR on POVERTY: 50 Years Later...



https://www.youtube.com/watch?v=V_3zmBUCVcl

Goals and Objectives

- I. To provide an overview of Title I requirements that must be implemented in schools and districts.
- II. To enable the program director to implement Title I policies at the school and district level.
- III. To provide technical assistance and support to the Title I program director and others responsible for Title I program design and implementation.

Agenda

1. Overview of *Elementary and Secondary Education Act*
2. Intents and Purpose of Title I
3. Eligibility
4. Comprehensive Needs Assessment
5. Program Requirements
 - * Targeted Assistance and Schoolwide
6. Family and Community Engagement
7. Paraprofessionals
8. Professional Development
9. Serving Nonpublic School Students
10. Title I Fiscal Responsibilities



Title I, Part A: Intent and Purpose

Public Law 107-110 Section 1111-1127: Improving the Academic Achievement of the Disadvantaged

Improving Basic Programs Operated by Local Education Agencies (LEA) to provide **supplemental** funding to state and LEAs for resources to help schools with high concentrations of students from low-income families provide a high quality education that will enable all children to meet the state's student performance standards.



New Jersey
DEPARTMENT OF EDUCATION

Signing of the *Elementary and Secondary Education Act (ESEA) of 1965*



<http://www.youtube.com/watch?v=QQzCV1UdPLc>



Title I - A Brief History

- 1965 - *Elementary and Secondary Education Act (ESEA)*
- 1981 - *Educational Consolidation and Improvement Act (Chapter 1)*
- 1988 - Reauthorized – focus on accountability
- 1994 - *Improving America's Schools Act (Title I)*
- 2001 - *No Child Left Behind Act*
- 2008 - New Rules – CFR 200
- 2010 - Secretary's Blueprint for Reform
- 2011 - *ESEA Flexibility Waivers*
- 2013 - Renewal of *ESEA Flexibility Waivers*
- 2015 - Renewal of *ESEA Flexibility Waivers*
- 2015- Reauthorization- *Every Student Succeeds Act (ESSA)*



Scope of Title I-Nationwide

- Federal allocation of over \$14 billion
 - Title I represents the largest federal *elementary* and *secondary* education program
- Over 66,000 schools
- Over 50 million students served

*US Department of Ed-Data Express (<http://eddataexpress.ed.gov/index.cfm>)



Scope of Title I in New Jersey

- Allocation of \$306,628,577
- 398,948 students served (9,122 nonpublic) in 2013-2014)
- Supplemented instructional programs in English Language Arts, Mathematics, Science, Social Studies and CTE
- Provided support services: guidance, medical, dental, eye care (Title I Schoolwide and Homeless)



DETERMINING TITLE I ELIGIBILITY



School Eligibility

Eligible School Attendance Area (§ 1113)

- The proportion of economically disadvantaged students in a school determines the amount of ***funds*** that may go to a school.
- Any student enrolled in an eligible school may receive Title I ***services*** if they are low achieving.
- Districts must distribute and account for all Title I funds.
- nonpublic school students in served school attendance areas must receive an equitable share.



School Eligibility

1. Select poverty criteria: Community Eligibility Provision (CEP), Free/Reduced Lunch, TANF, Medicaid, Composite, Feeder Method
2. Rank Schools: Based on the percentage (not number) of children from low-income families
3. Serve Schools
 - 75% rule
 - Poverty rate at/above district poverty rate
 - Grade-span grouping
 - Poverty rate below 35%
 - *Per pupil expenditure calculated at 125% or 1.25 times the district per pupil amount*
 - Poverty rate \geq 35%



COMPREHENSIVE NEEDS ASSESSMENT (CNA)



Comprehensive Needs Assessment

ESEA § 1112(a)(b)(1)(A-E)

- Ongoing process, not one-time event
- Centerpiece for planning
- Organized & systematic set of procedures
- Determine needs, examine root causes, and set priorities for future action



Comprehensive Needs Assessment

ESEA § 1112(a)(b)(1)(A-E)

Purpose:

- Examine multiple data sources to identify priority academic needs and direction for a school
- Collect data related to student achievement
- Identify strengths and challenges in key areas that impact student achievement
- Specify priorities to address students' academic achievement in meeting challenging state academic standards



Comprehensive Needs Assessment

ESEA § 1112(a)(b)(1)(A-E)

MUST be based on academic achievement data for ALL students in school, including following subgroups:

- Economically Disadvantaged
- Racial & Ethnic Groups
- Students with Disabilities
- English Language Learners (ELLs)
- Migrant Students
- Homeless Students



Comprehensive Needs Assessment

ESEA § 1112(a)(b)(1)(A-E)

CNA: The Process:

- Establish A Schoolwide Planning Team/Stakeholder Group
- Clarify Vision for Reform
- Create School Profile
 - Demographic data
 - Poverty-rate
 - General education program
 - Staffing
- Identify Data Sources (and collect data)
- Analyze Data

Identify Data Sources

Types of Data

- Student Achievement
- School Climate & Culture
- Student Attendance
- College & Career Readiness
- Family & Community Engagement Activities
- School Operations & Management
- Professional Development
- Teacher Readiness & Qualifications
- School Schedules/Course Offerings
- Perceptions/Expectations
- Early Learning Readiness

Sources of Data

- Surveys
- Focus Groups
- State & Local Assessments
- Lesson Plans & Student Work
- Curriculum & Assessment
- Materials
- Observations Reports





Data Analysis

Final Step in Comprehensive Needs Assessment

- Discover 'Root' Causes:
 - Patterns, Trends, & Anomalies/Outliers
- Identify Gaps, Needs, & Goals
- Identify Emergent Needs: Areas of Priority
 - Student Achievement
 - Student Needs
 - Staff Needs
 - District Needs
 - Community Needs



Data Analysis

Disaggregate Data:

- Gender
- Race & Ethnicity
- Economically Disadvantaged
- English Language Learners (ELLs)
- Students with Disabilities
- Migrant Students
- Homeless Students

Triangulate Data:

- Example: When analyzing student achievement results, triangulate test scores with:
 - Lesson Plans
 - Curriculum Materials
 - Assessment Materials

Establish process for other stakeholders to review data and team's findings



TITLE I PROGRAM DESIGN



OVERVIEW – Title I, Part A

TARGETED ASSISTANCE (TA) ESEA § 1115

- Title I funds “target” lowest-performing students.
- Entrance and exit criteria based on multiple, objective, and uniform criteria
- Children who have the greatest academic need receive Title I services
- Districts may need to prioritize the student selection to provide a meaningful program

SCHOOLWIDE (SW) ESEA § 1114

- Title I funds upgrade school’s educational program to meet the state’s academic standards.
- **40 percent** of students must be from low-income families.
- A comprehensive needs assessment must be conducted.
- The school must engage its stakeholder group when developing the schoolwide plan



Supplement Not Supplant

Targeted Assistance Programs

Presumption of Supplanting

- The district used the Title I funds to provide services that the district was required to make available under federal, state, or local law.
- The district used Title I funds to provide services it provided with state/local funds in the prior year(s).
- The district used Title I funds to provide services for Title I students that it provided with state/local funds for non-Title I students.



Supplement Not Supplant

ESEA § 1120A (b)(1)

Schoolwide Programs

Presumption of Supplanting

Programs/services do not have to be supplemental – Title I funds used to support the program must be supplemental.

- District cannot reduce schools' state/local funding based on an increased Title I allocation.
- State/local funding to schools must be sufficient to support the school's basic educational program.
- Documentation that schools have enough state/local funds to fully operate without federal funds.
- District must be able to isolate the state/local funds needed for schools in current year and prior years.



Targeted Assistance Programs (TAS)

- Title I funds are used only for services for eligible children who are failing or **MOST** at risk of failing to meet state standards.
- Eight (8) required program components.
- Must identify student eligibility for services.



Targeted Assistance Programs (TAS)

Establish entrance and exit criteria based on multiple, objective, and uniform criteria such as:

- Assessment results, teacher recommendations, and parent recommendations.
- Children who have the greatest academic need receive Title I services.
- Districts must prioritize student selection to provide a meaningful program.



Targeted Assistance Programs (TAS)

Eight Essential Components

1. Assist students in reaching state standards
2. Based on effective means for improving student achievement
3. Ensure appropriate planning
4. Use instructional strategies effectively by minimizing pull-out and offering in-class support or extended day and summer programs
5. Coordinate with and support regular education programs such as pupil services (counseling, mentoring) and transition programs
6. Offer instruction by highly qualified staff
7. Provide professional development
8. Use strategies to increase parental involvement



Targeted Assistance Programs (TAS)

Instructional and Programmatic Strategies

- In-class support
- Extended day/year programs
- Summer programs
- Transition programs
- Coaches (limited to Title I funded teachers & eligible students)
- Test prep classes
- Specified professional development
- Response to Intervention (RTI) – Tiers 2 & 3 ONLY!
- Pull-out programming



BRAINSTORM





Scenario 1

A district wants to purchase an assessment tool with Title I, Part A funds for the sole purpose of identifying its Title I students.

Is this an allowable use of Title I, Part A funds?



Scenario 2

A district has five (5) elementary schools, each of which has a 0.5 Full-Time Equivalent (FTE) Reading Interventionist. The district proposes to use its Title I, Part A allocation to fund the Reading Interventionist at a 1.0 FTE at its two (2) Title I-funded schools.

Is this an allowable use of Title I, Part A funds?



Scenario 3

A district funds a Title I Math Intervention Program. A parent of a student with a disability requests that their child participate in the Title I Math Intervention program. However, the student's IEP already requires additional mathematics supports.

Would this student be allowed to participate in the Title I Math Intervention program?



Scenario 4

The school wants to contract with a reading expert to provide onsite professional development on techniques and assessment tools to help low-achieving students achieve lifetime results. The school would like every teacher to participate in the professional development. Is this allowable?

Is this allowable?



Scenario 5

The school would like to purchase computer software with Title I funds to supplement its instructional program for Title I students. The school identified 60 students eligible for Title I services. However, the software can accommodate up to 100 users at no additional cost. The school plans to allow non-Title I students to use this software as well. Is this allowable?

Is this allowable?



Scenario 6

A Title I school with a TAS program would like to use Title I funds to hire a data analyst, a Math Coach, and a Literacy Coach. Is this allowed?

Is this allowable?



Title I Schoolwide

ESEA § 1114





Schoolwide Program (SW)

- Initial eligibility - minimum student poverty rate of 40% (applies to “non-categorized” schools)
- Entrance and Exit criteria are **NOT** required
- Three Core Elements
 1. Comprehensive Needs Assessment
 2. Schoolwide Plan (essential “10” required components)
 3. Evaluation/Annual Review



Schoolwide Programs (SW)

Comprehensive Needs Assessment

Five-Step Process:

- Establish Stakeholder/Planning Team
- Clarify Vision for Reform
- Create School Profile
- Identify Data Sources (and collect data)
- Analyze Data



Schoolwide Programs (SW)

Comprehensive Needs Assessment

Data-Driven Decision Making

Purpose: Enables schools to identify strengths and weaknesses, in order to specify priority needs and plan activities to help improve student achievement and meet state academic standards. The following can be used:

- State assessments
- District commercial tests and other data
- Teacher tests and observations
- Surveys and stakeholder input



Schoolwide Programs (SW)

Comprehensive Needs Assessment

- Includes the input of all stakeholder groups
 - Teachers, administrators, families, community members, students (secondary), and technical assistance providers
- Ongoing process that is summarized in the schoolwide plan
- Foundation for the use of Title I funds
- Expenditures not supported by comprehensive needs assessment are not “necessary and reasonable.”



Schoolwide Programs

10 Required Components

COMPREHENSIVE NEEDS ASSESSMENT	INCREASED PARENTAL INVOLVEMENT
SCHOOLWIDE REFORM STRATEGIES	TRANSITION OF PRESCHOOL CHILDREN
HIGHLY QUALIFIED TEACHERS	TEACHER DECISIONS REGARDING ASSESSMENT
PROFESSIONAL DEVELOPMENT	ASSISTANCE TO AT-RISK STUDENTS
RECRUITMENT AND RETENTION OF HIGHLY QUALIFIED TEACHERS	COORDINATION & INTEGRATION OF SERVICES & PROGRAMS



Schoolwide Plan

- Annual requirement
- Uploaded to Schoolwide folders on NJDOE Homeroom
- “**Non-categorized**” schoolwide programs complete a *Title I Schoolwide Plan*
- “**Categorized (Priority/Focus)**” schoolwide programs complete a *School Improvement Plan (SIP)*



Schoolwide Plan

Stakeholder Engagement

- Developed with the involvement of parents and other members;
- Provide all students in the school the opportunity to meet the state's proficient and advanced levels of student academic achievement;
- Use effective methods and instructional strategies that are grounded in scientifically based research; and
- Strengthen the core academic program in the school.



Schoolwide Plan

Reform Strategies

- Provide all students in the school the opportunity to meet the state's proficient and advanced levels of student academic achievement
- Use effective methods and instructional strategies that are grounded in scientifically based research
- Strengthen the core academic program in the school



Schoolwide Plans

Family and Community Engagement

- Schoolwide plans must contain strategies to actively involve families and the community in assisting children to do well in school.
- Families and communities must be involved in the planning, implementation, and evaluation of the schoolwide program.



Schoolwide Programs

Evaluation/Annual Review

Schoolwide programs must—

- Annually evaluate the implementation of, and results achieved using data from the State's annual assessments and other indicators of academic achievement;
- Determine whether the schoolwide program has been effective in increasing the achievement of students in meeting the State's academic standards, especially the lowest achieving students; and
- Revise the plan, as necessary, based on the results of the evaluation, to ensure continuous improvement of students in the schoolwide program.



FACTORS to CONSIDER





Scenario 1

A school operating a schoolwide program wants to increase the number of 12th grade students who attend their summer academic-support program. Any 12th grade student who has perfect attendance is given the option to select one of two incentives: (1) Participation in a field trip; or (2) Receipt of a \$25 gift card.

Is this allowable?



Scenario 2

A school operating a schoolwide program decides to provide teachers with professional development for curriculum enhancement. This activity was not articulated in the Comprehensive Needs Assessment or Schoolwide Plan for that school.

Is this allowable?



Scenario 3

In a school operating a schoolwide program, the amount of state funding budgeted for professional development activities for teachers and principals is reduced by 10%, and Title I funds are used to make up this difference. This information is included in the school's Schoolwide Plan.

Is this allowable?

time for

a break!



FAMILY AND COMMUNITY ENGAGEMENT





Why Family and Community Engagement?

- It is required by law.
- It helps raise student achievement.



Family and Community Engagement

- Applies to all Title I districts & schools.
- Comprehensive and based upon families' needs.
- Benefits the greatest number of Title I families who have children being served in Title I programs.
- At least one-percent (1%) reserve of Title I allocations \geq \$500,000 .



Family and Community Engagement

Statutory Authority: **ESEA § 1118** (Parent Involvement)

- Parent Requirements:

- District Parental Involvement Policy
- School Parental Involvement Policy
- School-Parent Compact

- Required Parent Notifications:

- Right-to-Know Letter
- Highly-Qualified Status of Teachers and Paraprofessionals
- Title I Annual Parent Meeting
- Parent Notification Letter (for TAS)



Some examples of allowable expenses for parental involvement activities

- Family literacy training
- Parenting skills building
- Meetings to engage parents in planning, development, and evaluation of Title I programs
- Professional development for parents to enable all children in the school to meet State performance standards, during the regular school year and the summer



Some examples of allowable expenses for parental involvement activities

- Reasonable expenditures for refreshments or food at parent workshops and trainings.
- ESL and GED preparation courses for adults; evening classes that develop practical skills, such as computer proficiency.
- Equipment and books to create a lending library collection for parents.
- Equipment and supplies for a parent resource room to be used for parent workshops and other training sessions.



Title I Parental Involvement Notification Requirements for Districts

<http://www.ed.gov/family-and-community-engagement>

<http://www.state.nj.us/education/title1/program/parent/resources/Requirements.pdf>

* Includes sample templates



PARAPROFESSIONALS



Paraprofessional Requirements

ESEA § 1119(g)

Instructional paraprofessionals in Targeted Assistance (if Title I funded) and Schoolwide programs (all) **MUST** meet one of the following criteria:

- Hold an Associate's Degree or higher;
- Completed two years of college coursework; or
- Passed a rigorous test showing the ability to assist with the teaching of reading, writing, and mathematics.



Paraprofessional Duties

ESEA § 1119(g)(2)

1. Provide one-on-one tutoring when a student is not being instructed by a teacher.
2. Assist with classroom management.
3. Provide instructional assistance in a computer lab.
4. Conduct parental involvement activities.
5. Provide support in a library/media center.
6. Act as a translator.
7. Provide instructional support under the direct supervision of a certificated teacher.



PROFESSIONAL DEVELOPMENT



Professional Development

ESEA § 1114(b)(1)(D) & ESEA § 1115(d)(1)(3)

- Must be sustained, high-quality, classroom-focused training in core content areas and strategies that work.
- Use of Title I funds for PD will vary depending upon Title I program.
- Funded Title I teachers, principals, paraprofessionals, and other staff may participate (incidentally).



Professional Development

Allowable Uses

- Strategies tied to the State's academic standards, state student performance standards, and consistent with the needs assessment.
- Activities involving parents in the education of their children.
- Activities addressing the needs of teachers in Title I schools with a focus addressing students most “academically” at-risk.
- Activities incorporating teaching strategies in the CCSS/CCCS areas for meeting the needs of “academically” at-risk students.



SERVING ELIGIBLE NONPUBLIC SCHOOL STUDENTS



Equitable Services Provision

ESEA § 1120

Requires districts receiving Title I funds to provide services to:

- Eligible nonpublic students
- Teachers of eligible nonpublic school students
- Families of eligible nonpublic school students



Equitable Services

Why?

- Census poverty data includes low-income families with nonpublic school children.
- Census poverty data used to determine districts' Title I allocations.
- Child Benefit Theory: Funds benefit child **ONLY**.



Child Benefit Theory

34 CFR § 200.66

- Title I services benefit the “individual” child, **NOT** the entire school.
- Services are provided by the district, **NOT** the nonpublic school.
- Child Benefit Theory complies with interpretations of the First Amendment on the separation of church and state. **Funds may never go to the nonpublic school!**



Equitable Services Provision

Third-Party Providers:

- The district guides the design of the program;
- Same grade span as served public school;
- Must have a Board approved contract;
- Contract must contain at a minimum:
 - Detailed description of services;
 - Contract amount (cannot be exceeded);
 - Number of students to be served;
 - Monthly billing with supporting documentation; and
 - End of Year Report.



Equitable Services Provision

- **Step 1:** Locating Resident Nonpublic Students
- **Step 2:** Counting Nonpublic Students
 - Enrollment data, Income data
- **Step 3:** Generating Nonpublic Allocation



Equitable Services Provision

Step 1: Locating Resident Nonpublic Students

- Resident nonpublic schools
- Bordering nonpublic schools
- Transportation Documents (Busing routes, Aid-in-Lieu)



Equitable Services Provision

Step 2: *Counting Resident Nonpublic Students*

- **Enrollment data:** Match resident nonpublic students to their public school attendance area.
- **Low-income data:** Contact schools enrolling resident nonpublic students:
 - Various methods: survey, extrapolation, proportionality
 - Beginning in 2015-2016, district must determine if nonpublic school participates in CEP.



Equitable Services

Step 3: *Generating Nonpublic Allocations*

- **Who:** Nonpublic students who: 1) live in the attendance area of a Title I public school; and 2) come from low-income families.
- **How:** District enters enrollment and low-income numbers into its annual, *ESEA-NCLB* Consolidated application.
- **How much:** The same per-pupil amount as public school students residing in the Title I attendance area.



Equitable Services

Nonpublic Student Participation

- Resides in the participating attendance area of the school district.
- Selected on the same basis as targeted assistance students.
- The district consults with nonpublic school official(s) and establishes clearly defined entrance and exit criteria to meet the needs of eligible nonpublic school children using multiple, educationally related, objective criteria.



Equitable Services

Allocating Funds

District reserves off the top –

- Districtwide Instructional Program
 - Parental Involvement
 - LEA Professional Development
- Amount of funds is proportional to the number of nonpublic school children from low-income families residing in public school attendance areas.



Equitable Services *Consultation*

Consultation between the public school and nonpublic schools, during the design and development of the programs:

- Must be timely and meaningful.
- Must take place on an annual basis, and be documented by the district: (Sign-in sheets, agenda, written affirmation).
- Must continue throughout the year, to ensure the needs of nonpublic school students are being met.
- Occurs before the school district makes any decision that affects the opportunities of eligible nonpublic school children, teachers, and other educational personnel to participate.



Equitable Services

Delivery of Services

- Under control and supervision of the public school.
- The public school maintains control of all materials, supplies, equipment, and property acquired with Title I funds for the benefit of eligible nonpublic school students.
- Services for nonpublic school children must begin at the same time as services for public school children.



Equitable Services

Delivery of Services

Key word is services. No public funds are distributed to nonpublic schools, only services and materials.



Equitable Services

Delivery of Services

Examples

- Instructional services outside the regular classroom
- Extended learning time (before/after school and in the summer)
- Family literacy programs
- Counseling programs
- Early childhood
- Home tutoring
- Computer-assisted instruction



Equitable Services

Delivery of Services

- Materials and supplies purchased with Title I funds may ONLY be used by the “identified” Title I students in the Title I program.
- Must be supplemental and may not replace or supplant services that would, in the absence of Title I, be provided by the nonpublic school to participating nonpublic school children.



Equitable Services

Evaluation

The district in conjunction with nonpublic school officials **MUST** define ‘annual progress’ for nonpublic school Title I participants. If annual progress is not met, the district in conjunction with nonpublic officials must modify the Title I program.



Equitable Services

Equipment/Materials/Supplies

District Responsibilities:

- Retain title to equipment, materials, and supplies;
- Exercise continuing administrative control of equipment, materials, and supplies; and
- Identify and inventory all equipment, materials, and supplies.



Equitable Services

Equipment Identification

- Must be affixed to equipment (e.g., barcodes, tags, etc.)
- Must specifically denote:
 - District Name;
 - Federal program under which purchased; and
 - Year of purchase.



Equitable Services

Equipment Inventory

At a minimum, include the following:

- Description of item/property;
- Serial, model, or other ID number (bar code or local identifying number);
- Funding source of item/property;
- Titleholder (name of funding title/grant program);
- Acquisition Date & Acquisition Cost;
- Records showing maintenance procedures (in good condition);
- Percentage of federal participation in cost; and
- Location of item/property.



TITLE I FISCAL RESPONSIBILITIES



NJDOE is Here to Help!

“The most terrifying words in the English language are:

“I’m from the government and I’m here to help.”

President Ronald Reagan



Uniform Grant Guidance

Why?

- 2009: \$110 billion in improper payments
- 2010: \$125 billion in improper payments
- 2011: \$115 billion in improper payments
- Payments in error over a three-year period include:
 - \$180 million to 20,000 individuals who were dead
 - \$230 million in benefits to 14,000 fugitive or jailed felons who were not eligible



Uniform Grant Guidance

Intent of Uniform Grant Guidance (UGG)

- Streamline the federal government's guidance on Administrative Requirements, Cost Principles, and Audit Requirements for federal awards.
- Reduce administrative burden.
- Promote flexibility.



Uniform Grant Guidance

2 CFR 200

- Easy Link to guidance in readable format
 - <http://grants.complianceexpert.com/agency-guidance-and-regulations?qr=1>
- Sweeping changes to put all grant recipients on the same guidance
 - Purchasing
 - Responsible Person
 - Limited Use of Sole Source
 - Internal Controls
 - Allowable Costs
- Effective Date for New Jersey – Any grant starting July 1, 2015



Grant Information

Uniform Grant Guidance Solutions

New

Under the Uniform Grant Guidance, we may see:

- Timelines and deliverables
- Sub-budgets for each objective
- Need to tie financial spending to objectives
- Level of risk (determined by NJDOE)
- Specified performance expectations



Internal Control Procedures

- Strong internal controls provide reasonable assurance that a grantee is managing its awards in compliance with federal statutes, regulations, and the terms and conditions of the federal grant.
- UGG § 200.303 and 200.61 emphasize the importance of having documented internal controls.



Internal Control Procedures

- Written policies and procedures are required which address:
 - Cash Management Procedure - § 200.302(b)(6) & 200.305
 - Allowability Procedures - § 200.302(b)(7)
 - Conflicts of Interest Policy - § 200.318(c)
 - Procurement Procedures - § 200.19(c)
 - Method for Conducting Technical Evaluations of Proposals and Selecting Recipients - § 200.320(d)(3)
 - Travel Policy - § 200.474(b)



Standard Operating Procedures

- Disbarred Vendors
- Procurement
- Sole Source
- Competitive Contracting under UGG
- EWEG Draw Down



Procurement

Just Remember:

***“No law or ordinance is
mightier than understanding.”***

Plato



Procurement

Uniform Guidance 2 CFR 200.415, Required Certifications

- The certification required by the Uniform Grant Guidance is required for requests for payments by subgrantees and grantees, not by contractors that are requesting payment from a subgrantee or grantee.
- However, as part of a non-Federal entity's internal controls, that entity might want to require similar certifications from its contractors. If a non-Federal entity chose to impose this requirement on its contractors, the non-Federal entity would be assured that any certification it provides that is based on a payment to a contractor is also supported equal protections for the Federal dollars. ***We reiterate that the Uniform Grant Guidance does not impose this certification requirement on contractors.***

Who will be the Accountability Officer?



Procurement

Purchase Order Procedures

- UGG § 200.317-.326 list procurement requirements.
- Written procurement policies must require purchases to be necessary and reasonable, and adequately documented.
- Procurement procedures must also reflect applicable State, and local laws and regulations.



Procurement

Uniform Grant Guidance 2 CFR § 200.320

Procurement by micro-purchases.

- Acquisition of supplies or services, the **aggregate dollar** amount of which does not exceed \$3,000 (October 1, 2015 went to \$3,500) To the extent practicable, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers.
- May be awarded **without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.**



Procurement

Uniform Grant Guidance 2 CFR § 200.320

Procurement by small purchase procedures.

- Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold (\$100,000).
- Price or rate quotations must be obtained from an adequate number of qualified sources.



Procurement

Uniform Grant Guidance 2 CFR § 200.320

New Jersey Thresholds only important if more restrictive

18A:18A-3(a) and (c) Limits for bid and quote not important if
Greater than Federal (always the more restrictive applies)

- Bid Threshold with QPA - \$40,000
- Quote Threshold with QPA - \$6,000
- Bid Threshold without a QPA - \$29,000
- Quote Threshold without a QPA - \$4,350

FEDERAL UNDER \$3,000 Aggregate

State Limit for Bid is less than Federal of \$150,000



Procurement

Uniform Grant Guidance 2 CFR § 200.320(f), Methods of Procurement – Sole Source

(f) Procurement by noncompetitive proposals. Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- (1) The item is available only from a single source;
- (2) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- (3) The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or
- (4) After solicitation of a number of sources, competition is determined inadequate.

***** Watch Vendor Names in Grant Application *****



Allowable Costs

Covered in Subpart E: Cost Principles
200.400 of the Uniform Guidance
Protect allowable costs

Internal policies may need revision to better align with the UGG and to protect allowable costs.



Allowable Costs

Uniform Grant Guidance 2 CFR 200.430

WAGES

§ 200.430 Compensation—Personal services

- Must account for Non-Charged Time (Issue was with charging over 100% to multiple grants)
- If you use the prescribed model, you should be covered



Time Sheets / PARS

Who got in Trouble

- 2006 – Columbus - \$2.3 million
- 2008 – Detroit - \$49 million
- 2009 – Houston - \$238 million
- 2010 – Philadelphia - \$123 million



Allowable Costs

Uniform Grant Guidance 2 CFR 200.439

EQUIPMENT

Property records must be maintained that include:

1. a description of the property,
2. a serial number or other identification number,
3. the source of funding for the property (including the FAIN),
4. who holds title,
5. the acquisition date, and cost of the property,
6. percentage of Federal participation in the project costs for the Federal award under which the property was acquired,
7. the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.



Allowable Costs

Equipment – Continued

- A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.
- A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated.
- Adequate maintenance procedures must be developed to keep the property in good condition.



Allowable Costs

Considerations Before Buying Equipment

- Is the equipment reasonable and necessary for the efficient performance of the federal award?
- Is the Title I eligible school operating a targeted assistance or a schoolwide program?
 - Equipment must be acquired exclusively for the use of Title I students in a targeted assistance environment and must be mentioned in school improvement plans, if applicable.
 - Equipment purchased for use in schoolwide programs must be mentioned in schoolwide plans.



Allowable Costs

Considerations Before Buying Equipment

- Capitalization Thresholds
 - UGG § 200.439 establishes an equipment capitalization threshold of \$5,000 per unit.
- N.J.A.C. 6A:23A-8.1 (f)(3)(i) provides an equipment capitalization threshold of \$2,000 or more per unit.
- The “more restrictive” threshold of \$2,000 applies to federal grants awarded to districts by NJDOE.



Allowable Costs

Computing Devices

- Most computing devices cost less than \$2,000 per unit.
- Grantees must maintain “effective control over, and **accountability for, all funds, property and other assets.**”
 - Pursuant to UGG § 200.302(b)(4), grantees must maintain effective control and “**safeguard all assets** and assure that they are used solely for authorized purposes” regardless of cost.
- NJDOE requires districts to maintain an inventory log of items acquired with federal funds that are more expensive to replace than to track.



Selected Items of Cost

- Special rules for specific expenses
- Still subject to basic guidelines
- Examples:
 - Alcohol: Never allowable
 - Salaries and Wages:
Allowable if time distribution
 - Meetings and conferences:
Allowable if dissemination of
technical information





Allowable Costs

Uniform Grant Guidance 2 CFR 200.421

Advertising and public relations (§ 200.421)

Advertising is not allowable, except for:

- Hiring of personnel for the grant
- Procurement of goods and services for the grant
- Disposal of scrap (per the grant program)
- Program outreach (new)
- Social media advertising for personnel (new)



Allowable Costs

Uniform Grant Guidance 2 CFR 200.456

MEALS

§ 200.456 Participant support costs

- Participant support costs as defined in § 200.75
- Participant support costs are allowable with the prior approval of the Federal awarding agency.



Allowable Costs

Uniform Grant Guidance 2 CFR 200.438

ENTERTAINMENT

§ 200.438 Entertainment costs

Costs of entertainment, including amusement, diversion, and social activities and any associated costs are unallowable, **except where specific costs that might otherwise be considered entertainment have a programmatic purpose** and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency.



Allowable Costs

Uniform Grant Guidance 2 CFR 200.474

TRAVEL

§ 200.474 Travel costs

- (2) The costs are reasonable and consistent with non-Federal entity's established travel policy.
- (c)(1) Temporary dependent care costs (as dependent is defined in [26 USC 152](#)) **above and beyond regular dependent care that directly results from travel to conferences is allowable provided that:**
 - (i) The costs are a direct result of the individual's travel for the Federal award;
 - (ii) The costs are consistent with the non-Federal entity's documented travel policy for all entity travel; and
 - (iii) Are only temporary during the travel period.



Accounting Codes

- The Uniform Minimum Chart of Accounts “Chart of Accounts” for New Jersey School Districts as required by N.J.A.C. 6A:23A-16.2, designates the use of specific codes for the provision of NCLB instruction and support services.
- The Chart of Accounts can be found at <http://www.nj.gov/education/finance/fp/af/coa/coa.pdf>
 - Title I: 231-239
 - IDEA: 250-259
 - Title II: 270:279
 - Title III: 241-245



Comparability

ESEA § 1120A(c) / ESSA § 1118

- Any district, charter school or renaissance school must complete the report
- Report in EWEG at bottom of screen where NCLB/ESEA/ESSA Application is located
- Due the first Friday in December for the current year (Dec 2015 is 2015-2016 Report)
- Must pass because it verifies a part of supplanting



Supplement Not Supplant

ESEA § 1120A(B)

Shall use funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from non-Federal sources And not to supplant such funds

ESSA § 1118

- To demonstrate compliance with paragraph (1), a local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving assistance under this part.
- Does this mean school level budgets across the board? More to come ...



Board Resolutions – Grant Applications

- Board approvals are required for the submission of grant applications.
- Board approvals for the submission of amendment applications.
 - Districts must certify in the assurances of these applications that board resolution will promptly be obtained, and that the certified board resolutions and board minutes will remain on file and be available upon request.
- Districts are asked to produce these board resolutions during fiscal audits of titled programs.



Board Resolutions –Staff

UGG § 200.430 Compensation—personal services

Compensation for personal services includes all remuneration, paid currently or accrued, for services of employees rendered during the period of performance under the Federal award, including but not necessarily limited to wages and salaries. Compensation for personal services may also include fringe benefits which are addressed in § 200.431 Compensation—fringe benefits. Costs of compensation are allowable to the extent that they satisfy the specific requirements of this part, and that the total compensation for individual employees... follows an appointment made in accordance with a non-Federal entity's laws and/or rules or policies and meets the requirements of Federal statute, where applicable...

NJDOE Requirements

Appointment of Personnel Paid 100% or Partially with Federal Funds:

- Name
- Salary
- Work Location
- Funding Percentage for Each Program
- Note: Anytime a change of funding source occurs, the event must be recorded in the board of education meeting minutes. A revised certification must be prepared and signed by the appropriate parties.



Select Expenditures and Support Needed

General Purchases – Uniform Grant Guidance Rules

- Must have good controls in place
- Cash Management (EWEG Draw down policies and support)
- Written procedures by districts that determine allowability
- *Must have conflict of interest policy*
- *Cost Price Analysis softened (more to come)*

***REMEMBER – Money spent in Individual Schools
should EQUAL amount in Step 4 of Eligibility***



Select Expenditures and Support Needed

Employee Benefits

- TPAF/FICA reimbursement applies only to teachers' contracted salaries, supervisors and program directors
- TPAF/FICA reimbursement report does not apply to aides, secretaries or clerical, stipends, substitute teachers, or summer teachers
- All other benefits based on actual cost, not budgeted percentages



Select Expenditures and Support Needed

Employee Benefits – TPAF/FICA Reimbursement Report

Salaries	Title 1	Other Federal	Total	Rate	Total
Contractual Salaries	352,808.00	-			
	352,808.00	-	352,808.00	6.68%	23,567.57
Amounts subject to SS	352,808.00	-	352,808.00	7.65%	26,989.81
Amounts only subject To Medicare			-	1.45%	-
	352,808.00				\$ 50,557.39



Selected Items of Cost

Student Incentives

- Districts may use Title I funds to provide “*non-monetary*” rewards of “*nominal*” value (e.g., plaque, gift certificate, or book, etc.) in an effort to recognize Title I students for good performance.
- Title I funds may NOT be used to pay students a stipend or provide some other type of award as an incentive for student participation in a Title I program



Selected Items of Cost

Parent Incentives

- To encourage parents of Title I students to participate in school activities in the evening, districts may use Title I funds for light refreshments.
- Note: Other necessary and reasonable expenditures for parent involvement include child care and transportation to enable parents to attend “*school-related*” meetings and training sessions



Helpful Questions to Ask When Analyzing Costs

- Is the proposed cost consistent with federal cost principles? OMB A-87, Attachment B
- Is the proposed cost allowable under the relevant program? (Title I, *IDEA*, etc)
- Is the proposed cost consistent with an approved program plan and budget? (EWEG)
- Is the proposed cost consistent with program specific fiscal rules? (Supplement not Supplant)
- Is the proposed cost consistent with EDGAR?



Expending Funds

- Documentation required for both school-level and district-level expenditures
- Documentation must explain:
 1. *How is the expenditure reasonable and necessary to carry out the intent and purpose of the program?*
 2. *What need, as identified in the comprehensive needs assessment, does the expenditure address?*
 3. *How would the program, activity, or strategy be funded if the Title I were not available?*



Expending Funds

Documentation must explain:

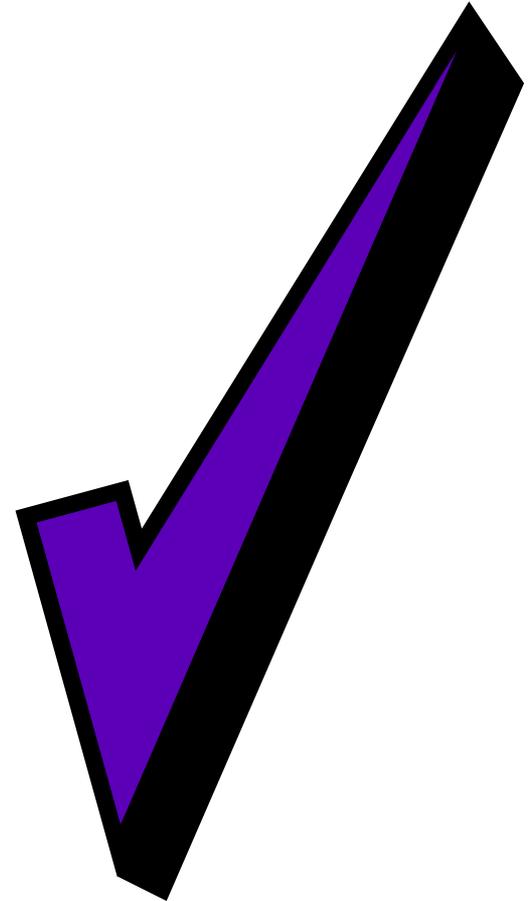
- If for a schoolwide program, how will the expenditure upgrade the entire educational program on the campus, especially the lowest achieving students?
- How is the expenditure supplemental to other nonfederal programs?
- How will the expenditure be evaluated to measure a positive impact on student achievement?



Allowable Costs

All Costs must be:

- Necessary
- Reasonable
- Allocable
- Legal under state and local law





Allowable Costs

Necessary & Reasonable

A district hires a limousine to transport teachers to a professional development workshop held in Washington D.C.





Allowable Costs

Necessary & Reasonable

A district along the shore hires a boat to transport parents to a Parent Involvement meeting held in Atlantic City





Allowable Costs

Necessary & Reasonable

A district brings 5 staff to a professional development conference in Dublin, Ireland on how to teach low performing students





Nonpublic Expenditures

- Same Fiscal Rules Apply
 - Only your district's students
 - Students who need extra services
- NO longer just supplies/computer – SERVICES ARE REQUIRED
- Carryover
 - Funds not spent in prior year (Discretion)
 - Automatic flow of district carryover in EWEG



Nonpublic Expenditures

Third-Party Provide Contracts

- Administrative costs in contract count against the district's 5% cap
- Who pays the administrative costs?
Off the top of the district's allocation or other Title I funds (USDE Non-Regulatory Guidance)



Nonpublic Expenditures

Third-Party Provider Contracts - Required Components

- When bid, the specifications should have the Stephens Amendment wording
- Vendor Complaint Policy
- Entity providing parental involvement activities
- Renting/Ownership of Supplies, Trailers, etc.
- Breakout of invoices to include:
 - Instructional Salaries and Benefits
 - Instructional Supplies
 - Rental of books, supplies, trailers
 - Administrative Charges/Profit



Final Expenditure Reports

- Must be consistent with budget (amendments filed through EWEG)
- CANNOT:
 - Move more than 10% of **total funds** without State approval
 - Add a budget category without State approval
 - Carryover more than 15% of **total amount** received more than once every three years without State approval (Must have good reason)



Carryover of Funds

Set Asides

Some Carryover Funds are Restricted to the Original Intent and Purpose of the Funding

**** Accounting Tracking Required ****

- Parental Involvement
- Priority/Focus Interventions



Schoolwide Programs

Monitoring Elements

- Approved plans that address all schoolwide components
- **Benchmark for State and Local Funding of School (not normally tracked)**
- Time sheets (except in a blended resource fund, e.g., Fund 15 for former Abbott districts)



Frequently Asked Questions

Time Sheets and Salaries

Q: Multiple Federal Grants – If someone works on multiple federal grants, must their salary be allocated to all the grants since it is one large federal pot of money?

A: *Yes, since each is a separately funded program.*



Fiscal News from Washington

New Haven Audit Report from Office of Inspector General

Supplanting in a Schoolwide Program

<http://www.ed.gov/about/offices/list/oig/auditreports/a02f0005.pdf>



Fiscal News from Washington

William Floyd Audit Report from Office of Inspector General

- Unsupported Expenses
- Unsupported Adjusting Journal Entries
- Supplanting of Textbooks
- Weak Internal Controls

<http://www.ed.gov/about/offices/list/oig/auditreports/a02f0030.pdf>



Fiscal News from Washington

City of Detroit and Parent Involvement Fund 2005

- Disallowed Charges for Entertainment, Promotional Items, and Public Relations
- Need to be necessary, reasonable, allocable, and documented
- Disallowed items include advertising for an event and live musical entertainment at parent volunteer function

<http://www.ed.gov/about/offices/list/oig/auditreports/a05f0018.pdf>



Fiscal News from Washington

City of Detroit - Revisit in 2008

- Over \$131 million in 2005 and \$126 Million in 2006
- No Time Sheets – Almost \$50 Million
- Teaching non-Title I students – even though most of Detroit is schoolwide some schools are not (no plan submitted) and OIG looked to these schools and found staff being funded who were teaching non-Title I identified students. Detroit argued they could have been schoolwide if they did a plan and the OIG rejected this argument
- Over \$21 million for adjusting entries for employees who were charged to other programs and then charged to Title I
- Gift cards they could not show went to students
- \$150,000 for martial arts training



Fiscal News from Washington

OIG Audit - St. Louis

- Lost 125 Computers
- Serving Ineligible Schools
 - <http://www.ed.gov/about/offices/list/oig/areports.html>



Fiscal News from Washington

OIG Audit

Kiryas Joel Union Free School District

- Supplanted funds by charging rent to lease building for public school
- Could not Support Salaries for After School Program

<http://www.ed.gov/about/offices/list/oig/areports.html>



Fiscal News from Washington

Philadelphia

- Findings totaling \$138,376,068
- Unsupported salaries (some direct and some through adjusting entries)
- School police paid from Title I Funds
- Supplanting (moving company, etc)
- No backup for school choice charges of \$1.3M
- Weak internal controls



Fiscal News from Washington

Maryland – Title I ARRA Funds

- Findings totaling \$540,013
- \$8,736 in gifts to staff
- \$4,352 in Dinner Cruises in Baltimore Harbor
- Lack of Receipts for Expenses
- \$200,323 in Unsupported Title I and IDEA Salaries
- 3,922 for tablets with no controls over them or applications that are downloaded (Items against policy – 22%)



Fiscal News from Washington

Former Charles County Public Schools (Maryland) Title I Coordinator.

- Used Title I funds for technology items (e.g., computers, video games consoles, portable media players, tablet computers, and televisions) for herself, family, and friends
- Sentenced to 27 months in prison and 36 months of supervised release.
- Ordered to pay more than \$115,300 in restitution for theft.



Fiscal News from Washington

- Former Detroit Public Schools **contract accountant and school board candidate**, and her daughter, a **Detroit Public Schools teacher**, convicted of program fraud conspiracy, money laundering conspiracy, and tax charges
- Between 2004 and 2008, offenders **obtained in excess of \$530,000 from the Detroit Public Schools**
- Offenders set up a sham company for books and educational materials that were never provided to schools.
- Offenders conspired to launder the fraud proceeds and to defraud the IRS and failed to report the money fraudulently obtained from the Detroit Public Schools as income on their tax returns.
- United States Attorney Barbara L. McQuade said, “Anyone who considers stealing from our school children should take note that we are scrutinizing records and conduct, and will prosecute wrongdoers.”



Common Audit Findings

- Lack of time sheets (or signature of employees/supervisors)
- Improper payroll distribution (not pro-rated)
- Purchase orders not indicating Title I (and adjusting entries to reclassify amounts)



Common Audit Findings

- Policies not being updated for current law
- Supplanting on purchases of non-salaried items
- Not spending at the schools approved in the application
- Not liquidating within timelines (now less than prior year)



Resources

Available Research & Where to Find It

- OMB Uniform Guidance

<http://grants.complianceexpert.com/agency-guidance-and-regulations?qr=1>

- EDGAR

<http://www.ed.gov/policy/fund/reg/edgarReg/edgar.html>

- ESEA / No Child Left Behind

www.ed.gov/legislation/ESEA02/index.html

- CONTACT US: anthony.hearn@doe.state.nj.us
titleone@doe.state.nj.us



Conclusion

Remember:

- *“If you take the money, you are responsible for knowing the rules and regulations concerning the grant.”*
- If you need further help contact Anthony Hearn
 - (609) 633-2492
 - anthony.hearn@doe.state.nj.us



Web Site Resources

NJ Department of Education

<http://www.state.nj.us/education/title1>

<http://www.nj.gov/njded/grants/nclb/>

Title I Parental Involvement Notification:

<http://www.state.nj.us/education/title1/program/parent/resources/Requirements.pdf>

US Department of Education Guidance

<http://www.ed.gov/print/programs/title1parta/legislation.html>

NCLB Consolidated Subgrant Reference Manual

<http://www.nj.gov/njded/grants/entitlement/nclb/nclbrefman.pdf>

USDE Uniform Grant Guidance

<http://www2.ed.gov/policy/fund/guid/uniform-guidance/index.html>

<http://www2.ed.gov/policy/fund/guid/uniform-guidance/granteepresentation.pdf>

Community Eligibility Provision

<http://www.fns.usda.gov/sites/default/files/SP19-2014os.pdf>



US Department of Education

Non-Regulatory Guidance

- Targeted Assistance
- Schoolwide Programs
- Parental Involvement
- Paraprofessionals
- Private School Children

Web site: <http://www.nj.gov/njded/title1/leg/>



ESSA Timeline

- December 10, 2015: Signed into law by President Obama
- August 1, 2016: *ESEA* Flexibility Waiver expires
- 2016-2017 School Year: Title I funds expended consistent with *NCLB*
- 2017-2018 School Year: Title I funds expended consistent with *ESSA*



Transitioning to ESSA

- Every Student Succeeds Act (ESSA) Webpage

http://www.ed.gov/essa?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=

- Frequently Asked Questions(FAQs)

http://www2.ed.gov/policy/elsec/leg/essa/faq/essa-faqs.pdf?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=

- ESSA Resource Webpage

http://www2.ed.gov/policy/elsec/leg/essa/index.html?utm_content=&utm_medium=email&utm_name=&utm_source=govdelivery&utm_term=

- Submit ESSA Transition Questions:

- Email: at essa.questions@ed.gov using the subject "ESSA Transition Question".
- Write: U.S. Department of Education, Office of Elementary and Secondary Education, 400 Maryland Avenue, S.W., Washington, DC 20202.



Every Student Succeeds Act (ESSA)





When in Doubt, Reach Out!!



609-943-4283

titleone@doe.state.nj.us