

Title I- Tips to Success

Office of Federal and State Accountability
Consolidated Finance and Applications Team

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Agenda

- 15% Carryover
- Impact of ESSER
- Timely Approvals-Checklists
- Procurement
- Supplement Not Supplant



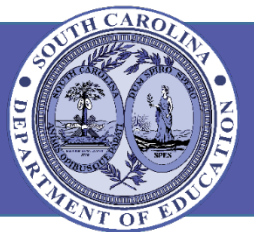
15% Carryover – Title I

Section 1127(a) of the Elementary and Secondary Education Act (ESEA) prohibits an LEA from carrying over to the next fiscal year more than 15 percent of its Title I, Part A allocation if the LEA's Title I allocation equals or exceeds \$50,000.00.



Tips to Meet the 15%

- Purposeful Planning
- Superintendent support
- Collaboration between program and finance
- Tracking of expenditures (monthly; quarterly)
- Timely and meaningful amending projects
- Collaboration with CFA program manager and team lead



Peer Talk

- How can the LEA prepare to meet the 15%?
- How did/does ESSER affect Title I/Title I 15%
- How can CFA assist the LEA?

- Share Out



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Requesting a Waiver

- Determine LEA's eligibility for a waiver (*granted every three years*) by contacting Jennifer Rhodes.
- If eligible, formally submit a waiver request letter addressed to Jewell Stanley. Send the letter to Jennifer Rhodes' email.
- SCDE will formally respond with an approval status letter.



What happens if I do NOT meet my 15%?

- LEA will forfeit any funds that are in excess of your 15%
- Excess funds will be reallocated to other districts according to SCDE's re-allocation criteria
- A new GANs with the reduced allocation must be issued
- GEMS and GAPS must be updated to reflect change
- Subrecipient Risk Assessment will be affected



Impact of ESSER



Planning for the Future- The End of ESSER

- Which Title works best?
- Impact to Title I projects
- Supplement Not Supplant
- Purposeful Planning
- Stakeholder Involvement
- Collaboration
- Impact to MOE- preparation



Timely Approvals



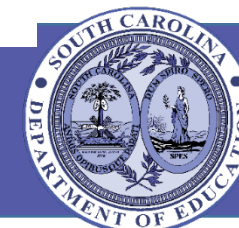
Tips to Timely Title I Project Approval - Checklist

Preliminary Title I LEA Project Approval Checklist

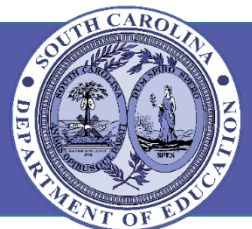
District _____ Completion Date of the initial checklist _____



Contacts	Yes	No	NA
Ensure that all contacts have been updated (Title I, Parenting, Foster Care).			
Eligibility 	Yes	No	NA
LEA and school poverty percent has been calculated and verified.			
All K-12 schools (public and charter) have been listed, ranked by percent based on Pupils in Poverty.			
Eligible and served schools have been marked.			
Schools to be served are eligible.			
Private school poor count and allocations are correct.			
Higher ranked schools receive > or = to PPA of lower ranked school.			
Total public allocation + total private allocation = total amount allocated to the schools.			
School Data Collection Page	Yes	No	NA
Selection of eligible Title I schools were determined by one of the following: 35% rule or district average.			
Any skipped school is receiving additional funds equal to what the school would have received from Title I.			
Private Schools Page	Yes	No	NA
All private schools in the geographical boundary are listed and participation status is clearly indicated. (Check participation letters)			
Calculation of private school proportion has been determined.			
LEA Set Aside Page	Yes	No	NA
The LEA set-aside at least 1% of its new allocation for parental involvement activities. (If LEA receives >= \$500,000)			
The LEA set-aside funds for the homeless.			
Total set-aside + total amount allocated to the school = Total amount requested			
Additional set asides have been filled out including activity, use of funds, and project activity cost.			
District implementing activity is listed.			
The activity title has been properly stated.			



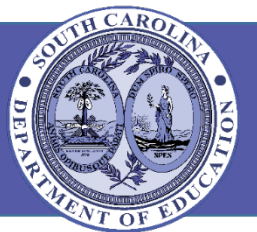
LEA Set Aside Page (Continued)	Yes	No	NA
A description of sites to be served has been provided.			
A brief description of the program to be implemented has been provided. The description includes 1) how the need and purpose of this district program was determined, 2) the targeted student population to be served, and 3) the timeframe that this program will be implemented.			
Describe how this program is supplementing and not supplanting state and locally funded programs and services.			
Appropriate activities have been completed for the district set-aside instructional program.			
The activities are allowable and reasonable.			
Items noted are allowable expenditures under this program and supplemental in nature.			
Staff and FTEs are sufficient to effectively operate the activities			
Allocations to the Served Schools			
All schools with > 75% poverty are served before serving any schools at or <75%.			
Budget Page	Yes	No	NA
Ensure that the indirect cost amount does not exceed the maximum allowance.			
School funding amounts match the Allocation to the Served School Page			
Tags have been assigned to each activity (Reform Strategies, Use of Funds, Identified Needs, and Data).			
Reform strategies 1-11 have been addressed with appropriate activities which meet the requirement of the strategies.			
Items noted are allowable expenditures under this program and supplemental in nature for LEA set asides.			
The activities are allowable and reasonable and are based on identified need in the needs assessment summary located in the Related Documents section.			
Staff and FTEs are sufficient to effectively operate the activities.			
Professional development is included which meets the definition/requirements of the law.			
Each professional development listed reflects the topic, the consultant's name (if applicable), number of days, and who will be involved in the training.			
Budget Overview Page			
Review page to ensure that the budget is balanced.			



Budget Plus/Minus	Yes	No	NA
Review page to track funding changes within the amendment process. (Not applicable for initial application review.)			
Maintenance of Effort	Yes	No	NA
Review page to ensure it has been completed. If district <i>Does Not Meet</i> MOE, contact Greg King			
Related Documents	Yes	No	NA
The needs assessment is appropriate, indicates a review of test data and other appropriate data sources, and identifies the needs based on the data.			
Use of Title I funds to address the identified need matches the identified need.			
Supplement Not Supplant Methodology is uploaded			
District Assurances	Yes	No	NA
Assurances 1–32 are checked and have an electronic signature of the LEA superintendent.			
Assurances have been marked to assure the district and school will comply with the requirements.			



Procurement



Federal Procurement Requirements

- All procurement transactions using ***federal funds*** must be conducted in a manner providing **full and open competition** consistent with 2 CFR 200.319(a) and §200.320
- ***Noncompetitive procurements*** can only be awarded in accordance with §200.320(c).



Noncompetitive Procurement with Federal Funds

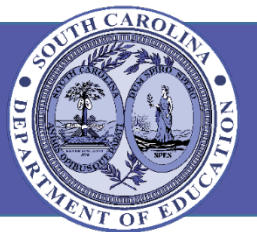
Can only be awarded if one or more of the following apply:

1. The acquisition of goods or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold

- Procurement policy adopted by the subrecipient
- If the District is more restrictive, must use the most restrictive
- Do not split procurement to meet

2. The item is available only from a single source

- *Sole source procurement*
- Vendor has sole source letter (*This does not mean good/ service qualifies as sole source.*)



Noncompetitive procurement (Continued)

3. The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation

- Emergency Procurement (involves time constraint - leaves no time for competition)

4. The Federal awarding agency or pass-through entity expressly authorizes a noncompetitive procurement in response to a written request from the non-Federal entity

5. After solicitation of a number of sources, competition is determined to be inadequate



Best Practices- Planning is KEY

Spring Planning for FY25 Grants (continuity of services or new activities)

- Review timelines for schoolwide submissions, purchases, and procurement. May need to revise the timeline if the district seeks to contract with a vendor.
- Survey schools to see which vendors they would like to use for the upcoming year to determine if the district may exceed the micro-purchase threshold.
- Reach out to the SCDE program manager prior to competition if implementing a new, innovative activity so the activity will be approved in the application.



Best Practices- Planning is KEY

Spring Planning for FY25 Grants (continuity of services or new activities)

- Remember that purchases that **exceed** the micro-purchase threshold must:
 - Follow the district's procurement policy
 - Seek competition (**start as soon as possible**)
 - Do you need to seek sealed bids or solicit a proposal?
 - **Sealed bids-** Bidder conforms with all the material terms and conditions of the invitation and is the lowest price.
 - **Request for proposal (RFP)-** Identifies all evaluation factors and their relative importance. Awarded to the responsible offeror whose proposal is most advantageous to the recipient/subrecipient with price and other factors considered.
 - Only seek Non-Competitive Procurement Approval if necessary

No matter the method used for procuring goods or services, it must be necessary, reasonable, and allocable to the grant.

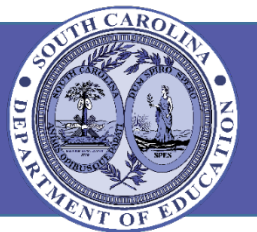


How is procurement reflected in my GEMS project?

- Budget narratives
 - Vendor names
- Uploading Noncompetitive Procurement forms



Supplement Not Supplant



Supplement, Not Supplant

According to federal guidance:

LEAs may use Title I funds only to supplement or increase the level of funds that would, in the absence of Title I funds, be made available from non-federal sources for the education of students participating in Title I programs.



Where it began and why do we do it?

Beginning in SY 2018-2019, Districts were asked to develop a methodology for demonstrating that Title I funded schools receive their fair share of state and local dollars (which the SCDE monitors)



Supplement, Not Supplant

- LEAs are required to submit a neutral methodology to demonstrate that all schools have received their fair share of state and local funding.
- Title I funds should not be used to meet other federal requirements (Title III, IDEA, etc.)



Are my activities supplemental?

- ? Is it required by the state, district, or federal statute or regulation? (Title III, IDEA, class size)
- ? Are the same services provided for in non-Title I schools or students with (non-supplemental) state/local funds?
- ? Were these activities paid for in prior years with state/local funds?



What's in a methodology?

The SEA must look at school budgets, staffing formulas, weighted per pupil distribution funds for instruction, MOE, comparability, and other factors affecting equity.



The bottom line...

Look at your state/local funding of schools, **in the absence of federal funding**, and determine if the schools are receiving funding or resources equitability.



Resources

- [Title I Checklist.docx](#)
- [NonCompetitive Procurement Request Form](#)



Questions



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Contact Information for Consolidated Finance and Applications (Title I/II/IV/V/N&D)

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