

NEW COORDINATOR'S DAY TWO TRAINING

There's More to This Than Money!

**Office of Federal and State Accountability
Consolidated Finance and Applications Team**

August 2021



ROLES AND RESPONSIBILITIES

Responsibilities of Finance and Applications Team

- Review and approval of the following applications:
 - *Title I, Part A – Improving Academic Achievement of the Disadvantaged*
 - *Title II, Part A- Supporting Effective Instruction*
 - *Additional Target Support and Improvement*
 - *Comprehensive Support and Improvement*
 - *Title IV, Part A - Student Support and Academic Enrichment (SSAE)*
 - *Title V- Small, Rural School Achievement*
 - *Neglected and Delinquent*
- Calculate allocations/Track Claims
- Track the 15% carryover threshold-Title I
- Issue GANS
- Process grant close out
- Manage GEMS
- Approve budgets in GAPS
- Provide technical assistance
- Advocate for parent and family engagement and private schools

PROJECT ASSIGNMENTS- Title I, II, IV,V

<i>Jennifer Rhodes</i>	<i>Jewell Stanley</i>	<i>Leslie Bloss</i>	<i>Marcus Corbett</i>	<i>Theresa Gregory</i>	<i>Sharay Mosley</i>	<i>Sarah Wagers</i>	<i>Martha Walker</i>
Florence 1	Abbeville	Aiken	Marlboro	Anderson 1	Dillon 3	Barnwell 19	Allendale
Kershaw	Charleston	Clarendon 2	Spartanburg 5	Anderson 2	Dillon 4	Barnwell 29	Bamberg 1
Laurens 55		Clarendon 4	Spartanburg 6	Anderson 3	Fairfield	Barnwell 45	Bamberg 2
Richland 1		Erskine	Spartanburg 7	Anderson 4	Horry	Chester	Beaufort
		Florence 2	York 1	Anderson 5	Jasper	DJJ	Berkeley
		Florence 3	York 2	Calhoun	Lee	Dorchester 2	Cherokee
		Florence 4	York 3	Colleton	McCormick	Dorchester 4	Chesterfield
		Florence 5	York 4	Darlington	Oconee	Greenwood 50	Edgefield
		Greenville		Georgetown	Saluda	Greenwood 51	Laurens 56
		Greenwood 52		Lancaster		Marion	Lex/Rich 5
		Hampton		Orangeburg		Newberry	Lexington 1
		Pickens		Spartanburg 3		Palmetto Unified	Lexington 2
		Richland 2		Spartanburg 4		Spartanburg 1	Lexington 3
		SC Public Charter		Sumter		Union	Lexington 4
		Williamsburg					Spartanburg 2

ALLOWABLE USE OF FUNDS

What are the allowable costs in the federal grants?

Levels of Complexity:

- ESEA Law and Regulations
- ESEA Program Guidance
- Education Department General Administrative Regulations (EDGAR)
 - 2 CFR Part 200– Basic allowability
 - 34 CFR Part 76 – General allowability for the USDE
- USED Policy Letters



Determining Allowability

Cost must be:

- ✓ Necessary
- ✓ Reasonable
- ✓ Allocable
- ✓ Conform to EDGAR
- ✓ Meet Terms and Conditions of the Grant Award
- ✓ Consistent with State and Local Policies
- ✓ Provided Consistent Treatment
- ✓ Adequately Documented
- ✓ Supplemental



Updates from Brustein and Mansevit

- Title I funds may not be used for the following:
 - Refreshments for professional development or staff meetings (see EDGAR page 301)
 - Purchasing items for Public Relations purposes (canvas bags, t-shirts). (see EDGAR 200.421)

GRANTS HOUSEKEEPING

Claiming Reminder

- It is imperative that districts submit quarterly claims. Submitting timely claims is not only a good fiscal practice but can save from problems at the end of a grant. Claims will be tracked on a quarterly basis. Sharay Mosley will be in communication with districts regarding claims.
- Reminder-The GAPS system shuts down automatically at closeout dates. The Title I office has no power over this automatic shut down. Do not wait until the midnight hour to try to submit claims.

|Claiming Criteria
Office of Federal and State Accountability
Consolidated Finance and Application's Team

Grant	Claiming Percentage Expectation Y1/Q1 July 1-September 30	Claiming Percentage Expectation Y1/Q2 October 1- December 31	Claiming Percentage Expectation Y1/Q3 January 1- March 31	Claiming Percentage Expectation Y1/Q4 April 1- June 30
<i>Title I</i>		40%	60%	85%
<i>Title II</i>		15%	30%	50%
<i>Title IV</i>		15%	30%	50%
<i>Title V</i>		15%	30%	50%

Grant	Claiming Percentage Expectation Y2/Q1 July 1- September 30	Claiming Percentage Expectation Y2/Q2 October 1- December 31	Claiming Percentage Expectation Y2/Q3 January 1- March 31	Claiming Percentage Expectation Y2/Q4 April 1- September 30
<i>Title I</i>	85%	90%	95%	100%
<i>Title II</i>	60%	75%	90%	100%
<i>Title IV</i>	60%	75%	90%	100%
<i>Title V</i>	60%	75%	90%	100%

Amendments

- Title I Coordinator *initiates* amendments. Amendments must be approved prior to implementation.
- Title I Coordinator informs project manager that an amendment is needed. Title I Coordinator initiates a revision within GEMS under “Revision Started”.
- Title I Coordinator resubmits the project to their project manager for approval and makes appropriate changes in GAPS.
- Title I Coordinator *communicates* with finance director that an amendment is forthcoming in GAPS.
- Once district finance submits the amendment, SCDE will approve in GAPS.
- *Communication is key to ensure effective processing of amendments.*

GRANTS ACCOUNTING PROCESS CHANGES

Grants Accounting Process Change

- State Fiscal Year: July 1 – June 30
- Federal Fiscal Year: October 1 – September 30
- SCDE receives two GANs from USED: Partial GAN on July 1, Full GAN on October 1
- Allocations are calculated, loaded into GEMS in May/June/July so districts can begin planning
- There is a new procedure here at SCDE where Grants Accounting will not load a grant into GAPS until we have the final GAN from USED.
- Therefore, applications will be approved but a district will have to wait until October to load the budget into GAPS.
- Indirect Cost Rates will be edited for both new and old grants at the time of final allocations.

UPDATES AND DUE DATES

Updates

Awarded: Preliminary

- 2022 Title I Allocations
- 2022 Title II Allocations
- 2022 Title IV Allocations
- 2022 N&D Allocations

To be Awarded:

- 2022 REAP Allocations
- All Final and School Improvement Allocations

Due Dates

- Title I due - July 1
- Title II due - July 31
- Title IV due - August 31

Closeout:

- 2019 Expiring grants- September 30, 2021
- 2020 Expiring grants- September 30, 2021

**TITLE IV- STUDENT
SUPPORT AND ACADEMIC
ENRICHMENT GRANT**

Background

- Under subpart 1 of Title IV, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as reauthorized by the Every Student Succeeds Act of 2015. The South Carolina Department of Education first introduced this grant as the 18 Title IV grant.

Overview

The (SSAE) program is intended to improve student academic achievement by increasing the capacity of state educational agencies, local educational agencies (LEAs), schools, and local communities to:

- 1) provide all students with access to a well-rounded education, 2) improve school conditions for student learning, and 3) improve the use of technology in order to improve the academic achievement and digital literacy of all students.

Three Content Areas

Well Rounded- at least 20% of funds

Safe and Healthy- at least 20% of funds

Technology- no more than 15% of funds

Content Area 1 – Well Rounded

- Improving access to foreign language instruction, arts, and music education
- Supporting college and career counseling, including providing information on opportunities for financial aid through the early FAFSA
- Providing programming to improve instruction and student engagement in science, technology, engineering and mathematics (STEM), including computer science, and increasing access to these subjects for underrepresented groups
- Promoting access to accelerated learning opportunities including Advanced Placement (AP) and International Baccalaureate (IB) programs, dual or concurrent enrollment programs and early college high schools
- Strengthening instruction in American history, civics, economics, geography, government education, and environmental education

Content Area 2 – Safe and Healthy

- Promoting community and parent involvement in schools
- Providing school-based mental health services and counseling
- Promoting supportive school climates to reduce the use of exclusionary discipline and promoting supportive school discipline
- Establishing or improving dropout prevention
- Supporting re-entry programs and transition services for justice-involved youth
- Implementing programs that support a healthy, active lifestyle (nutritional and physical education)
- Implementing systems and practices to prevent bullying and harassment
- Developing relationship building skills to help improve safety through the recognition and prevention of coercion, violence, or abuse
- Establishing community partnerships

Content Area 3 – Technology

- Supporting high-quality professional development for educators, school leaders, and administrators to personalize learning and improve academic achievement
- Building technological capacity and infrastructure
- Carrying out innovative blended learning projects
- Providing students in rural, remote, and underserved areas with the resources to benefit from high-quality digital learning opportunities
- Delivering specialized or rigorous academic courses and curricula using technology, including digital learning technologies and assistive technology

ALLOCATIONS TO LEAS

Background

In general, the Department allocates the SSAE program funds to States by formula based on each State's share of funds under Title I, Part A of the ESEA. (ESEA section 4103(b)).

SEAs award SSAE subgrants to LEAs by formula in the same proportion as to the LEAs' prior year's Title I, Part A allocations. (ESEA section 4105(a)(1))

LEA Allocations

- Reservation- State Administration- 1% of total
- Reservation- State Level Activities- 2% of total
- LEA Allocations- 97%- Remainder of total

Period of Performance

- Each grant is open for a 27-month period
 - 2019 Grant: July 1, 2018 – September 30, 2021*
*(Extended one year due to COVID-19)
 - 2020 Grant: July 1, 2019 – September 30, 2021
 - 2021 Grant: July 1, 2020 – September 30, 2022
 - 2022 Grant: July 1, 2021- September 30, 2023
- The state's fiscal year ends June 30th. Therefore, claims through June 30th of each year must be submitted in GAPS by August 15th.

NEEDS ASSESSMENT (NA)

NA: Stakeholder Involvement

- Teachers
- Principals
- Other School Leaders
- Instructional Support Personnel
- Private School Administrators

Online Application

Based on needs assessment and allocation awarded.

Follow guidance from USED and SCDE when developing plan.

Online application should be completed and submitted by your Superintendent by August 31st.

ALLOWABLE USE OF FUNDS

Supplement, Not Supplant

- Title IV funds may be used only to supplement educational program activities provided with state and local funds.

- The LEA may not use Title IV funds to pay for activities that, in the absence of these funds, would be provided with state and local funds.

FISCAL MANAGEMENT

Records Retention

- All financial and programmatic records and supporting documents must be kept for five years after the expiration of the grant.
- If any litigation, claim, negotiation, audit or other action involving the records arises, records must be retained until resolution or until the end of the regular 5-year period, whichever is later.

Amendments

An amendment is required when:

- There is an increase/decrease in the total grant
- There is a change in the scope of an activity
- There is a change in function/object code

- Step #1: District updates the online application in GEMS.
- Step #2: SCDE reviews amendment and either sends it back to the district for edits or approves.
- Step #3: Upon receiving approval, district completes the amendment in GAPS.
- Step #4: SCDE approves the amendment in GAPS.
- **REMEMBER: The amendment should be approved before the activity takes place.**

*The last day to submit a budget amendment is approximately June 5th.

Drawdown of Funds

- Districts are expected to encumber and draw down funds in a timely manner.
 - At least quarterly
 - Can drawdown monthly
 - Claims are tracked quarterly

Transferability of Funds

- LEAs may transfer funds to other ESSA programs.
- The funds transferred become subject to all rules and regulations for the grant they are transferred into.
- LEAs must consider how the transfer will impact the required set-asides (Title I) and equitable services.

MONITORING

On-Site Monitoring

- The Consolidated Oversight and Monitoring Team visits LEAs to review the criteria included in the monitoring protocol.
- LEAs are monitored both on risk and a monitoring cycle.

On-Site Monitoring – Helpful Hints

- Document Title IV meetings (agenda, sign-in sheet and minutes)
- Make sure charges are for approved activities in the GEMS plan

LUNCH

TITLE II, PART A

SUPPORTING EFFECTIVE INSTRUCTION

Background

- Title II, Part A Improving Teacher Quality State Grant was originally authorized as the Eisenhower Professional Development program and Class Size Reduction program under the Elementary and Secondary Education Act (ESEA) of 1965
- Reauthorized as the No Child Left Behind Act (NCLB) in 2001
- Reauthorized as the Every Student Succeeds Act (ESSA) in 2015

Overview

- The purpose of the Title II, Part A grant is:
 - To increase student achievement consistent with challenging State academic standards
 - To improve the quality and effectiveness of teachers and principals
 - To increase the number of teachers and principals who are effective in improving student academic achievement in schools
 - To provide low-income and minority students greater access to effective teachers and principals

Three Guiding Principles

- Support for Educators
- Educator Equity
- Strengthening Title II, Part A Investments

Principle 1 - Support for Educators

- Multiple pathways to teaching and leading
- Induction and mentorship
- Meaningful evaluation and support
- Strong teacher leadership
- Transformative school leadership (state level)

Principle 2 – Educator Equity

- State Plans under ESSA must indicate how low-income and minority children are not served at disproportionate rates by ineffective, out-of-field or inexperienced teachers.” (Section 1111 (g)(1)(B))

“Ineffective Teacher” Definition

- An **ineffective teacher** will be defined as a teacher on an annual or continuing contract who has received a “not met” rating for one year OR a teacher on an induction contract who has received a “not met” rating for two consecutive years as outlined in Expanded ADEPT system guidelines.

“Inexperienced Teacher” Definition

- An **inexperienced teacher** is defined as an educator who has three or fewer years of teaching experience as indicated on their SC license. In SC, districts may keep their teachers on induction contracts for up to three years.

“Out-of-Field Teacher” Definition

- An **out-of-field teacher** is defined as a teacher who is teaching one or more courses or classes in a subject for which they do not have the appropriate certification.
- *Required Credentials for Professional Staff Members in the Instructional Programs of South Carolina’s Public Schools*, updated annually, establishes the acceptable certification credentials for educators working in various settings and roles.

Principle 3 – Strengthening Title II, Part A Investments

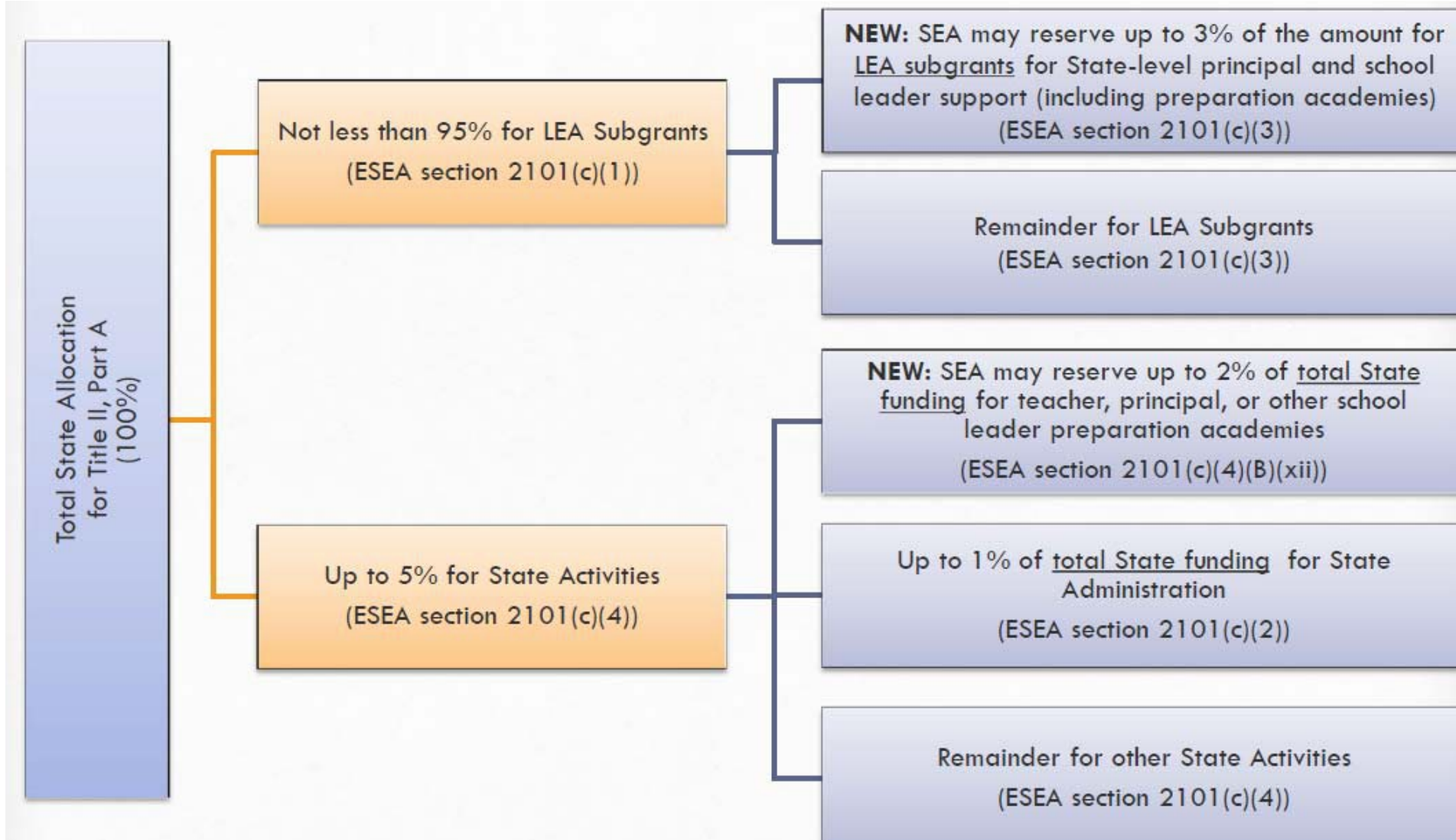
- Chosen interventions must align with **identified needs**
- The **evidence base** and the **district capacity** are considered when **selecting a strategy**
- There is a robust **implementation plan**
- Adequate resources are provided so the **implementation** is well-supported
- Information is gathered regularly to **examine** the strategy and to **reflect** on and **inform** next steps

ALLOCATIONS TO LEAS

Background

- Eisenhower Math and Science allocation
 - Based on Title I allocations and total population
- Class Size Reduction allocation
 - Based on both poverty and total population
- Under ESSA, the allocation to LEAs is now based solely on the weighted formula using Census data (80% poverty and 20% population).

LEA Allocations



Period of Performance

- Each grant is open for a two year period
- The state's fiscal year ends June 30th. Therefore, claims through June 30th of each year must be submitted in GAPS by August 15th. A final expenditure report for funds spent by September 30 is due to the SCDE no later than November 15.
- Work with your district finance staff to ensure timely submissions.

Maintenance of Effort (MOE)

- MOE is typically calculated by the district Title I or Finance office.
- Districts are required to maintain fiscal effort for Title II.
- If a district does not meet MOE and a waiver is not granted, Title funding will be reduced.

NEEDS ASSESSMENT (NA)

What is a Needs Assessment?

- A systematic effort to acquire an accurate, thorough picture of the strengths and areas for improvement of a district.
- A process of collecting information and then using that data to structure decisions that will determine priorities/goals.
- A way to determine what is happening that is impacting student learning and hypothesize what the root cause might be.

Purpose for Title II

The LEA must assure that information is gathered concerning the needs of its teaching force and school leaders in order to support all students in meeting challenging State content and standards.

- To determine the needs of the LEA as it relates to the grant requirements.
- To maintain an annual action plan of improvement.

NA: Stakeholder Involvement

- Teachers
- Principals
- Other School Leaders
- Paraprofessionals
- Instructional Support Personnel
- Charter School Leaders
- Private School Administrators

Needs Assessment

- Establish a timeline
- Engage stakeholders
- Summarize and analyze data to identify strengths and areas for growth
- The needs assessment will reflect a wide array of needs, not all of which may be able to be addressed with limited fiscal resources. Prioritize the needs where Title II is likely to produce the most positive results in teaching practice and the achievement of students.

NA – Suggested Data Sources

- Local, State and National Assessments
- Teacher Surveys
- PD course schedule, participation and evaluations
- Student Discipline
- Equity Data
- Induction feedback
- Audit Reports/Monitoring Reports

Online Application

- Based on needs assessment and allocation awarded.
- Follow guidance from USED and SCDE when developing plan.
- Online application should be completed and submitted by your Superintendent by July 31st.

ALLOWABLE USE OF FUNDS

Necessary and Reasonable

- Reasonable means costs:
 - Should not exceed that which would be incurred by a prudent person under similar circumstances.
 - Should be in the LEA plan.
 - Reflect sound business practices.
 - Reflect market prices for comparable goods and services for the geographic area.

Supplement, Not Supplant

- Title II funds may be used only to supplement educational program activities provided with state and local funds.
- The LEA may not use Title II funds to pay for activities that, in the absence of these funds, would be provided with state and local funds.
- Title II funds may be used to fund only the PD activities that supplement those mandated locally or by the state, and can supplement those discretionary PD activities that the LEA would fund in the absence of other local and/or state funding.

Supplement, Not Supplant

- In the following instances, it is presumed that supplanting has occurred if:
 - The LEA used Federal funds to provide services that were required under other Federal, State or local laws.
 - The LEA used Federal funds to provide services that were provided with non-Federal funds in the prior year.

Allowable Uses of Funding

- I. Initiatives to recruit and retain highly effective (HE) teachers
- II. Professional development to increase teacher knowledge and improve instruction in the classroom
- III. Professional development to improve the quality of instructional leadership teams, principals and other school leaders
- IV. Multiple career paths
- V. Teacher advancement initiatives

I. Recruit and Retain HE Teachers

- Signing bonuses
- Differential pay
- Recruitment fair registrations and travel
- Induction programs
- Teacher mentors
- Class size reduction
- Incentives for teachers and principals who have a record of success

Class Size Reduction

LEAs may reduce class size by creating additional classes in a particular grade or subject and placing qualified teachers hired with program funds in those classes.

- Federal funds cannot be used to meet state or local class size requirements.
- The school and grade level for CSR must be documented in the Needs Assessment and listed in the online application.
- CSR cannot be used for gifted or SPED programs.

Class Size Reduction

Although maximum class sizes have been suspended by the Legislature, whether there is a concern for supplanting can be determined using the following guidelines:

K-3: **30:1**

4, 5 and 6 (ELA and Math): **30:1**

4, 5 and 6 (Other Subjects): **35:1**

7, 8 (ELA and Math): **30:1**

7, 8 (Other Subjects): **35:1**

9-12 (150/day max, Academic Courses) **35:1**

9-12 (24/day max, Music and PE) **40:1**

Supplement, Not Supplant Test

- Run PowerSchool report for the grade
- Subtract the federally funded teacher(s) from the total number of teachers for that grade
- Divide the number of students by the number of state funded teachers assigned to the grade level
- If calculation is **at or below** the guideline – activity is supplemental
- If calculation is **above** the guideline – activity is supplanting

Class Size Reduction

- Be very cautious when applying funds to a position that was previously funded with state or local dollars.
- Maintain documentation supporting a reduction of funds.
- Contact SCDE for guidance.

CSR – Required Documentation

- CSR Worksheet
- School master schedule in chart format for each school that has a CSR teacher
- Daily schedules or teachers grouped by grade level or content area
 - Self Contained: Grade level, total number of students in each class
 - Departmentalized: Course name for each class, total number of students in each class
- Semi-annual certification(s)

II. Professional Development Definition

The term “professional development” means activities that –

- 1. Are an integral part of the district strategies for providing educators....with the knowledge and skills necessary to enable students to succeed in a well-rounded education and to meet challenging state standards; and
- 2. Are sustained (not stand-alone, 1-day, or short term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused.

II. PD - Teachers

- Improve content knowledge
- Improve instructional practices such as:
 - Addressing the needs of students with different learning styles
 - Improving student behavior in the classroom
 - Involving parents in their child's education (especially limited English proficient)
 - Understanding and using data and assessments to drive instruction
 - Integrating technology into instruction
- Supplements, stipends and substitutes

Professional Development Travel

- Travel costs are allowable for transportation, lodging and meals. The charges should be consistent with those normally allowed in like circumstances in non-federally-sponsored activities.
- State policy for meals MUST be followed.

Meals	Depart Before	Return After	In-State	Out-of-State
Breakfast	6:30am	11:00am	\$8.00	\$10.00
Lunch	11:00am	1:30pm	\$10.00	\$15.00
Supper	5:15pm	8:30pm	\$17.00	\$25.00
Daily Maximum			\$35.00	\$50.00

- Lodging – GSA rates (www.gsa.gov/perdiem)

PD – Additional Compensation

- **Supplements**: funds received for providing services above and beyond salary; commonly used for funding mentors and paying teachers to provide professional learning
- **Stipends**: given to certified personnel for having successfully completed PD that has occurred outside of the employee's contracted hours
- **Substitutes**: can be funded from Title II for time teachers are out of the classroom attending a Title II funded PD

PD - Supplies

Title II funds can be used to purchase PD supplies that are reasonable and necessary to carry out the PD.

- MAY purchase professional learning books for a book study on a topic that aligns with the needs assessment
- MAY NOT purchase books to stock a professional learning reference library
- MAY purchase 15 graphing calculators for 15 teachers to use during PD on math content
- MAY NOT purchase a classroom set of graphing calculators for the teacher to implement the strategies learned

III. PD - Leadership

- Under section 2103 (b)(3)(E) of ESEA, as amended by ESSA, districts may use Title II funds to provide PD for:
 - Teachers
 - Instructional leadership teams
 - Principals
 - Other school leaders

School Leader Definition

- Section 81010 (44) of ESEA, as amended by ESSA, defines “school leader” as a principal, assistant principal or other individual who is:
 - A. An employee of an elementary or secondary school, district or other entity operating an elementary or secondary school
 - B. Responsible for the daily instructional leadership and managerial operations in the elementary or secondary school building

PD - Leadership

- Professional development to help principals and superintendents become outstanding managers and educational leaders
- Development and support of academics to help talented aspiring principals or superintendents

IV. Multiple Career Paths

- PACE program
- CATE Work Based Certification Program
- Teach for America
- EPI

V. Teacher Advancement

- Promote professional growth
- Emphasize multiple career paths
 - Mentor training
 - Additional certifications (Montessori, GT, ESOL, etc.)
 - National Board
 - Advanced degrees

Non-Allowable Expenses

- Food
- General substitute teachers
- Instructional materials
- Evaluator training (supplanting issue)
- MAP testing and other benchmark testing
- Technology /equipment
- Recruitment giveaways with district logo

What's "Somewhat" New With Title II?

- **Instructional Services Provided by Libraries**

ESSA supports professional development intended to improve the instructional services provided by effective school library programs.

- **Instructional Services Provided by School Counselors**

ESSA supports professional development intended to improve the instructional services provided by effective school counseling programs such as:

- Ensuring students achieve academically and are college- and career-ready
- How to teach and address the needs of students with different learning styles. In particular, the needs of students with disabilities, students with special learning needs and English learners. This also includes training in methods to improve student behavior in the classroom and to identify early interventions to help students.

What's "Somewhat" New With Title II?

- **Supporting Students Affected by Trauma and/or Mental Illness**

ESSA supports the provision of in-service training for school personnel in techniques and support related to identifying and supporting students affected by trauma or mental illness, including the use of referral mechanisms, partnerships with outside organizations, or addressing school conditions for learning such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism.

- **Training to Recognize/Prevent Sexual Abuse**

ESSA supports the provision of training for all school personnel, including teachers, principals, other school leaders, specialized instructional support personnel, and paraprofessionals, regarding how to prevent and recognize child sexual abuse.

PRIVATE SCHOOLS

Private Schools

Private school teachers, principals and assistant principals are eligible to participate in the Title II, Part A program.

- Private school must hold non-profit status to be eligible
- Two options:
 - Participate with district
 - Receive allocation which remains managed by the district

Invitation to Participate

Invitations should be:

- Sent to private schools within the geographic boundaries of the district
- For involvement in the next fiscal year
- Mailed in a timely fashion in order to allow the participants the opportunity to take part in the annual needs assessment
- Mailed by USPS registered receipt

*Can coordinate mailing with other Federal programs

Calculating Private School Allocations

- The equitable allocation is based on the LEA's **total** Title II, Part A allocation.

$$\begin{array}{r} \text{Total Public School Students} \\ + \text{ Total Participating Private School Students} \\ \hline \text{Total Number of Students} \end{array}$$

$$\text{Title II Allocation} / \text{Total \# of Students} = \text{Per Pupil Amount}$$

$$\text{Per Pupil Amount} \times \text{\# of Students Enrolled in the Participating Private School} = \text{Private School Allocation}$$

Calculation Examples for Private School Allocations

Formula to Determine Amount for Equitable Services			
	Example	Example	Example
A. Number of Students	A	B	C
A ¹ District student enrollment	9,800	5,798	8,991
A ² Participating private school enrollment	464	540	254
A ³ Total number of students (A ¹ + A ²)	10,264	6,338	9,245
B. Title II Part A Total Allocation	306,141	284,508	372,316
D. Per Pupil Rate	\$29.83	\$44.89	\$40.27
E. Equitable Services			
E ¹ Amount district must reserve for equitable services for participating private schools (A ² x D). For more than one private school, multiply the per pupil rate by the individual school enrollment from A ² .	13,841.12	24,240.60	10,228.58

Private Schools

Needs Assessment

- Ensure timely and meaningful consultation
- Document the meeting
 - Meeting notification
 - Sign-in sheet
 - Minutes

Private Schools

Needs Assessment

Private school officials should provide input into the planning of the LEA's program activities.

- How students' needs inform the professional learning needs of teachers and principals
- What services will be offered
- How, where, and by whom the services will be provided
- How the services will be assessed

Private Schools

Permissible Uses of Funds

- Title II funds may be used for professional development activities for teachers, principals and headmasters to address the specific needs of their students.
 - **All funds must be under the control and supervision of the public agency responsible for providing the equitable services.**
- To the extent that teachers attend a faith based conference, Title II funds may be expended to pay for the portion of the conference costs determined to represent the secular PD in which the teacher participated.

Private Schools

Permissible Uses of Funds

- Private schools may not use Title II funds for class size reduction because a private school's contracts for its teachers would be inconsistent with the requirements of ESEA section 8501 (d) regarding public control of funds and the supervision and control of employees or contractors.

Private Schools

Reimbursement

- Districts cannot reimburse private schools directly
- Only the district may obligate and expend federal funds
 - District must procure services
 - District must purchase materials
 - District must reimburse individual teachers/principals
- District must ensure expenses are reasonable, necessary and allowable.

CHARTER SCHOOLS

Charter Schools

- Charter schools in South Carolina are public schools – either charter is held by district or SCPCSD or TCIE
- If your district holds the charter, treat the charter school as any other school in your district
- If part of SCPCSD or TCIE, the charter school will receive Title II services through SCPCSD or TCIE

PROFESSIONAL QUALIFICATIONS

Highly Qualified

- With the reauthorization of ESEA, HQ requirements were removed from law.
- LEAs should hire teachers who are properly certified for their teaching assignment.
- States began defining IOI in 2017-18 and began reporting data with the 2018-19 school year.

Parents Right to Know

- This requirement has not been removed from law.
- Must notify parents in a format that is understandable and in a medium that will reach all parents (if possible, provide in a language the parent will understand)
- Ensure the notification includes the principal's contact information, the school or LEA name, and the date of notification.

Parents Right to Know

- Must notify parents that they may request the following information regarding their child's teacher:
 - Whether the teacher has met the SC certification requirements for the grade level and subject area in which the teacher provides instruction
 - Whether the teacher is teaching under an emergency or other provisional status through which SC qualifications or certification criteria have been waived
 - The college major and any graduate certification or degree held by the teacher
 - Whether the student is provided services by the paraprofessionals, and if so, their qualifications

20-Day Letter

- LEAs are required to notify parents of children in Title I schools when their child is assigned to or taught for 20 or more consecutive days by a teacher who is not properly certified for the teaching assignment.

Transferability of Funds

- LEAs may transfer funds from: Title II or Title IV
- LEAs may transfer funds to: Title I, Migrant, Neglected and Delinquent, Title II, Title III, Title IV, Title V
- The funds transferred become subject to all rules and regulations for the grant they are transferred into.
- LEAs must consider how the transfer will impact the required set-asides (Title I) and equitable services.

RISK ASSESSMENT OVERVIEW

Risk Assessment

- A systematic process of evaluating the potential risks that may be involved in a projected activity or undertaking.
- Required by law
- LEAs are assigned points based on the following elements:
 - Key Personnel Turnover
 - Required Reporting
 - Programmatic Compliance
 - Fiscal Compliance
 - Performance Outcomes
 - Level of Technical Assistance

Risk Assessment

- Rating Scale
 - Low Risk 9-18
 - Medium Risk 19-28
 - High Risk 29 and above

The results of the agency wide rating may impact technical assistance and monitoring.

High Risk

- LEAs designated *high risk* may be subject to:
 - Annual Monitoring
 - Written Reporting
 - Program Implementation
 - Corrective Action
 - Increased Technical Assistance
 - Onsite Technical Assistance
 - Required Attendance at Trainings
 - Invoice Review Prior to Drawdown of Funds

Medium Risk

- LEAs designated *medium risk* may be subject to:
 - Monitoring
 - Interim Program Onsite or Desk Monitoring
 - Written Reporting
 - Program Implementation
 - Increased Technical Assistance
 - Onsite Technical Assistance
 - Required Attendance at Trainings

Low Risk

- LEAs designated *low risk* may be subject to:
 - Monitoring
 - As Designated by Monitoring Cycle

MONITORING

On-Site Monitoring

- SCDE's Consolidated Oversight and Monitoring Team
- LEAs are monitored both on risk and a monitoring cycle.
- Approximately one-third of LEAs are monitored on-site each year.

On-Site Monitoring – Helpful Hints

- Document Title II meetings (agenda, sign-in sheet and minutes)
- Retain signed mail receipts from private schools
- Use an online survey for teachers' professional development needs; keep a copy of the results on file
- Make sure charges are for approved activities in your district plan
- Ensure the district and school websites are up-to-date



TITLE V- RURAL AND LOW-INCOME SCHOOLS

REAP/RLIS

Overview

The purpose of the Title V grant is to address the unique needs of rural school districts that frequently lack the personnel and resources needed to compete effectively for Federal competitive grants; and who receive formula grant allocations in amounts too small to be effective in meeting their intended purposes.

Title V-Rural Low Income Schools Program Grant Description

- The grant is noncompetitive, and eligibility is determined by statute.
- Awards are issued annually to state education agencies (SEAs), which make sub-grants to local education agencies (LEAs) that meet the applicable requirements.
- Awards are made to all SEAs that apply and meet the applicable requirements of the act. (CFDA Number 84.358B)

Title V: Eligibility for the Rural Low Income School (RLIS Program)

A local educational agency shall be eligible to use Title V funding if the LEA meets the following criteria:

- the total number of students in average daily attendance at all of the schools served by the local educational agency is fewer than 600; or
- each county in which a school served by the local educational agency is located has a total population density of fewer than 10 persons per square mile; and all of the schools served by the local educational agency are designated with a locale code of 32, 33, 41, 42, or 43
- 20 percent or more of the children ages 5 through 17 years served by the local educational agency are from families with incomes below the poverty line; and all of the schools served by the local educational agency are designated with a locale code of 32, 33, 41, 42, or 43

Needs Assessment

- A needs assessment must be conducted and must clearly demonstrate a need in the area in which funds are to be spent.
- This assessment should include stakeholders such as teachers, administrators, other school personnel, parents, community members, and even students when feasible.
- The assessment summary narrative should include a discussion of the data that indicated the need.

Online Application

- The online application should be based upon the needs assessment and allocation awarded.
- The guidance from USED and SCDE should be followed when developing this plan.

Supplement, Not Supplant

- Title V funds may be used only to supplement educational program activities provided with state and local funds.
- The LEA may not use Title V funds to pay for activities that, in the absence of these funds, would be provided with state and local funds.

Allowable Use of Funds

Grant funds awarded to local educational agencies under this subpart shall be used for any of the following:

- Activities authorized under part A of Title I.
- Activities authorized under part A of Title II.
- Activities authorized under Title III.
- Activities authorized under part A of Title IV.
- Parental involvement activities.

Examples of Title V Activities Based Upon Title I Allowability

Activities to support

- Teacher Incentives
- Professional Development
- Substitute Teacher
- Technology
- Instruction

Examples of Title V Activities Based Upon Title II Allowability

Activities that support:

- Instructional staff
- Administrator Salaries
- Stipends
- Fringe Benefits
- Contracted Services
- Supplies, Materials, Equipment
- Travel

Examples of Title V Activities Based Upon Title III Allowability

Activities which support:

- Upgrading program objectives and effective instructional strategies
- Improving the instruction of English learners
- Immigrant students

Examples of Title V Activities Based Upon Title IV Allowability

Activities to support:

- Well-rounded education
- Safe and Healthy students
- Effective Use of Technology

Records Retention

- All financial and programmatic records and supporting documents must be kept for five years after the expiration of the grant.
- If any litigation, claim, negotiation, audit or other action involving the records arises, records must be retained until resolution or until the end of the regular five-year period, whichever is later.

Amendments

An amendment is required when any of the following occur:

- There is an increase/decrease in the total grant.
- There is a change in the scope of an activity.
- There is a change in function/object code.

Amendment

Procedure:

1. The district updates the online application in GEMS.
2. SCDE reviews the amendment and either sends it back to the district for edits or approves.
3. Upon receiving approval, the district completes the amendment in GAPS.
4. The SCDE approves the amendment in GAPS.

The last day to submit a budget amendment is approximately June 5th.

REMEMBER: The amendment should be approved before the activity takes place.

Drawdown of Funds

Districts are expected to encumber and draw down funds in a timely manner.

- At least quarterly
- Can drawdown monthly

The final expenditure claim for each fiscal year must be submitted in GAPS by November 15th.

Transferability of Funds

- LEAs may transfer funds to other ESSA programs.
- The funds transferred become subject to all rules and regulations for the grant they are transferred into.
- LEAs must consider how the transfer will impact the required set-asides (Title I) and equitable services.
- The SCDE Title V program managers must be notified in writing about the LEA's intent to transfer funds to another grant prior to submitting an application and budget.

On-Site Monitoring

The Consolidated Oversight and Monitoring Team visits LEAs to review the criteria included in the monitoring protocol.

LEAs are monitored both upon risk and during a monitoring cycle.

On-Site Monitoring – Helpful Hints

Document Title V meetings (agenda, sign-in sheet and minutes)

Make sure charges are for approved activities in the GEMS plan

Thank you for participating!

Please reach out to us if you have any questions:

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