# Title I, A Fiscal Issues

Application Issues Administrative Issues and Fiscal Issues



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### **Agenda**

- Title I, Part A Program Overview
  - Intent and Purpose
  - Targeted Assistance vs Schoolwide
- Internal Controls
  - Edgar and Risk Assessment
- Application issues
  - Planning (PS3001/Commissioner Priorities)
  - Campus Selection &

  - Campus Eligibility Campus Allocations

- Fiscal Requirements
  - Supplement/Supplant Maintenance of Effort

  - Comparability of Services
- Administrative Issues
  - Allowable Expenditures
  - Time & Effort
  - Testing of Expenditures Amendments

  - SRSA/REAP
  - Coordination of Funds
  - Consolidation of Funds
    - Administrative
    - Schoolwide Program
  - Carryover

# Title I, Part A

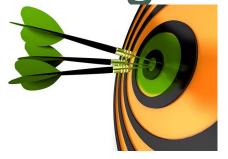
### Program Overview

### Intent and Purpose of Title I, Part A

To provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.



### Targeted Assistance vs Schoolwide



#### **Targeted Assistance**

#### **Schoolwide**



Funds may be used to serve identified students only (as per your local criteria in CIP)

Limited Flexibility
Staff paid with Title I, Part A funds may only
serve Targeted Students
Supplies purchased with Title I, Part A funds
may only be used by/for Targeted Students
Maintain records that funds are spent
only for Title I, Part A participating students

Funds may be used to serve all students to upgrade entire educational program

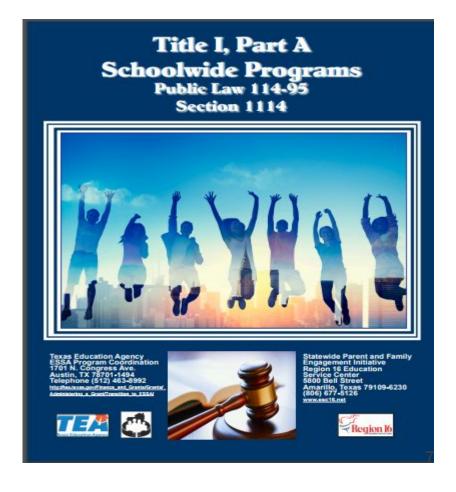
Greater flexibility
Not required to document that
particular expense is supplemental
Funds are used to upgrade program
(see <u>Schoolwide Guidance</u>)

### Schoolwide Program

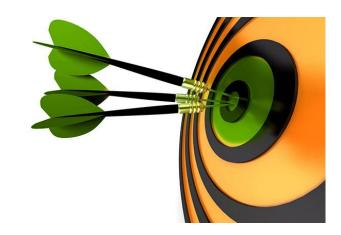
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- Funds are used to upgrade the entire educational program of the school to raise academic achievement for all students.
- The campus has 40% or higher low income (Ed-Flex waiver ended July 1, 2017)
- Statute requires one year of planning to become a Title I SW program, unless external technical assistance provider signs off that lesser time meets planning requirements



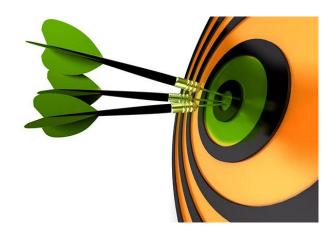


### Targeted Assistance Program



- A targeted assistance campus is one that receives Title I, A funds yet is ineligible for a schoolwide program or has chosen not to operate a Title I, A schoolwide program.
- Services are provided to a select group of children—those identified as failing, or most at risk of failing, to meet the State's challenging content and student performance standards
- The campus has less than 40% low income percentage.

### Targeted Assistance Program



- Supplemental services to eligible children identified as having the greatest need for special assistance
- Local Education Agency (LEA) establishes multiple, educationally related, objective criteria to determine which children are eligible to participate in Title I, A.

## Internal Controls

### **EDGAR & Risk Assessments**

### **EDGAR**

### **Internal Controls**

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Written Policies & Procedures Required by **EDGAR**:



- Written Cash Management Procedures §200.302(b)(6) & §200.305
- Written Allowability Procedures §200.302(b)(7)
- Written Conflicts of Interest Policy §200.318(c)
- Written Procurement Procedures §200.319(c)
- Written Method for Conducting Technical Evaluations of Proposals and Selecting Recipients - §200.320(d)(3)
- Written Travel Policy §200.474(b)

### **Internal Controls**

- effective internal controls
- Your LEA is not limited to the policies and procedures previously listed
- Your LEA must have policies and procedures for any need
  - Examples
    - Written policies and procedures for the use of credit cards
    - Written policies and procedures for segregation of duties
- What other policies and procedures does your LEA have?

### RISK ASSESSMENT

### Risk Assessment

rules.

Each LEA has been assigned a <u>risk level</u> to determine the likelihood that LEA may fail to comply with applicable

Learn your risk level by accessing GFFC Reports & Data Collections through your TEAL account.

- GFFC Reports & Data Collections
- Select "Risk Assessment Level" from report title menu
- Select "2017-2018" from the school year menu.



### Risk Assessment

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#### Effect of Risk Level:

- Differentiated Grant Negotiation medium/high risk level = more stringent
  grant negotiation review
- Subrecipient Monitoring higher risk level = more likely to be selected for monitoring



# Application Issues

### District Reservation, Campus Selection, Eligibility & Allocation

### **TEA Strategic Priorities**

Every child, prepared for success in college, a career or the military. Strategic priorities Recruit, support, Improve **Build** a foundation of Connect high school retain teachers and low-performing reading and math to career and college principals schools Increase transparency, fairness and rigor in district and campus academic and financial performance Enablers Ensure compliance, effectively implement legislation and inform policymakers Strengthen organizational foundations (resource efficiency, culture, capabilities, partnerships)

### **Planning**



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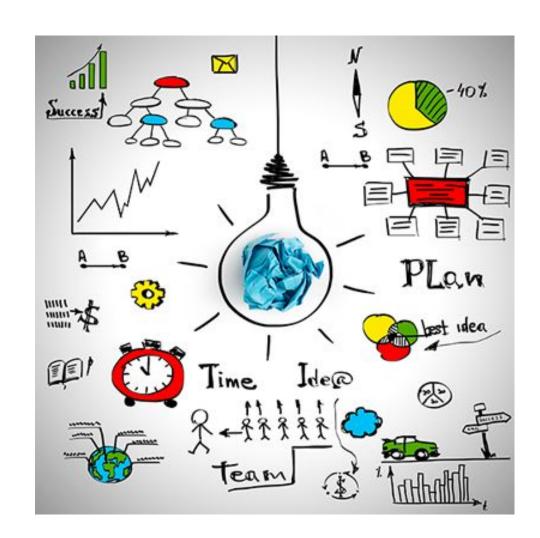
Schedule PS3001 Needs Assessment, Priorities & Program Outcomes

- Timely and Meaningful Consultation
- Data Driven Comprehensive Needs Assessments
- LEA Prioritizes Needs
- Prioritized identified needs are reviewed to determine Program Outcome goals
- Identify the funds budgeted to support TEA's Strategic Priorities & goals
- Identify activities related to applicable priorities and goals.

### **Planning**

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- Planning team consisting of all stakeholders
  - o Federal Programs, compliance, budget, finance
- Prepare program budget
- Documentation of the Process
  - Meeting documentation
  - Working papers
  - General ledgers



### **District Reservations**



Before allocating funds to campuses, LEAs must first determine district reservations:

#### Required Reservations

- Equitable Services to PNPs (must be set aside first)
- Parent & Family Engagement (1% min. if \$500,000+ entitlement; ≥ 90% to campuses)
- Homeless Children/Youth (Req'd of all LEAs)
- Neglected/Delinquent Children (if applicable)

#### Allowable Reservations

\*based on LEA Needs Assessment\*

- Program Administration
- Early Childhood Education
- Foster Care Transportation
- Incentives & Rewards
   (up to 5% for teachers @ Priority/Focus campuses)
- Choice Transportation
- Professional Development

### **Allocation of Funds**



- 1. Which campuses are eligible?
- 2. Which campuses will be served?
- 3. What is the per-pupil amount for each served campus?



# Title I-A Campus Eligibility



### Title I, A Campus Selection

An LEA may use Title I, A funds only in eligible school attendance areas and must use the same poverty measure for all campuses.



#### Campus Selection (ESSA)

#### Poverty Measures - LEA may choose from these options:

- 1. The number of children ages 5 to 17 in poverty as counted by most recent census data
- 2. Number of children eligible to receive free or reduced lunch
- 3. Number of children in families receiving assistance under TANF (Temporary Assistance for Needy Families)
- 4. The number of children eligible to receive medical assistance under Medicaid program or
- 5. A composite of any of the above indicators

# \*See handout\*

#### Single Attendance Area

#### What is it?

\*\*LEA with a total enrollment of less than 1,000 students (whether or not there are campuses with duplicated arades)

\*\*LEA with 1,000 or more students ONLY IF there are no campuses with duplicated grades

#### Requirements:

- \*\*All campuses in Single Attendance Area are eligible campuses to receive Title I-A services/funds
- \*\*Single Attendance Area may choose to serve any or all of their campuses regardless of rank order
- \*\*To be eligible for a Schoolwide Program, a campus in Single Attendance Area must have a low-income percentage of 40% or more (exception: Ed-Flex Waivers; Feeder Pattern, Previous Year SW eligibility)



#### Multiple Attendance Area

#### What is it?

\*\*LEA with 1,000 or more students WITH duplicated arades

#### Requirements:

- 1. Rank all campuses in order of <u>percentage</u> (not number) of low-income students <u>residing</u> in the school attendance areas. An attendance area is eligible if the percentage is greater than or equal to the LEA's percentage as a whole.
- 2. LEA must serve in rank order those campuses with lowincome percentage ≥ 75%. \*NEW\* LEA imay nclude high schools @ 50%+ in this group (optional)
  3. If funds remain after serving all campuses ≥ 75%
- poverty, the LEA must:
  - a. Rank remaining eligible campuses either by grade span or by LEA as a whole and
  - b. Serve these campuses in rank order either within the selected grade span grouping or by descending percentage.

\*If an LEA has no campuses above 75% poverty, LEA may rank district-wide or by grade span groupings.

### Campus Selection (ESSA)

#### Poverty Measures - LEA may choose from these options:

- The number of children ages 5 to 17 in poverty as counted by most recent census data
   Number of children eligible to receive free or reduced lunch
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- 5. A composite of any of the above indicators

### Single Attendance Area

#### What is it?

\*\*LEA with a total enrollment of less than 1,000 students (whether or not there are campuses with duplicated grades)

#### OR

\*\*LEA with 1,000 or more students ONLY IF there are no campuses with duplicated grades

#### Requirements:

- \*\*All campuses in Single Attendance Area are eligible campuses to receive Title I-A services/funds
- \*\*Single Attendance Area may choose to serve any or all of their campuses regardless of rank order
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### Multiple Attendance Area

#### What is it?

\*\*LEA with 1,000 or more students WITH duplicated grades

#### Requirements:

- Rank all campuses in order of <u>percentage</u> (not number) of low-income students <u>residing</u> in the school attendance areas. An attendance area is eligible if the percentage is greater than or equal to the LEA's percentage as a whole.
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- 3. If funds remain after serving all campuses ≥ 75% poverty, the LEA must:
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  - Serve these campuses in rank order either within the selected grade span grouping or by descending percentage.

\*If an LEA has no campuses above 75% poverty, LEA may rank district-wide or by grade span groupings.

### Campus Selection

#### Other Options @ LEA Discretion

#### 35% Rule

Any campus may be identified as eligible if 35% of children are from low-income families

Sec 1113 (b)(1)(A)

#### Optional Method

Use TI-A funds in otherwise ineligible school if % of low-income ENROLLED is ≥ the % of children in a participating campus in LEA

Sec 1113 (b)(1)(B)

#### **Prior Year**

Designate & serve a campus
that is not eligible for TI-A
but was eligible & served in
preceding year
(only for one add'l year)

Sec 1113 (b)(1)(C)

#### Skip

Elect to "skip" an eligible campus or one with a higher % of low-income if ALL are met:

- 1) Comparability requirements met
- Campus receives supplemental State/Local funds spent according to TI-A requirements
- Funds spent from other sources are ≥ the amount they would have rec'd in TI-A \*\*Still must provide TI-A to PNP students\*

Sec 1113 (b)(1)(0)

#### Feeder Pattern

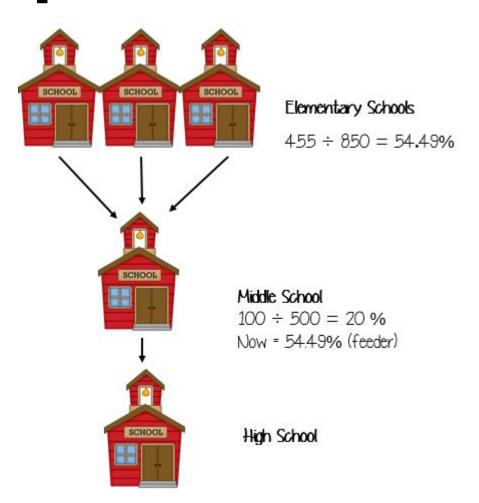
Allows LEAs to project number of low-income students in middle and high schools based on count in an elementary feeder school

Sec 1113 (a)(5)(B)

### Feeder Pattern Example:

Feeder Campus	Enrollment	Low-Income	
Elem #1	300	150	
Elem #2	285	140	
Elem #3	250	165	
TOTAL	835	455	

 $455 \div 835 = 54.49\%$ 





# Title I-A Campus Selection



### Reservation of Funds: Remember...





Consult with PNPs before making decisions affecting eligible PNP students





# Title I, A Campus Allocations



# Allocating Title I, A funds *General Rule*

- Charter schools allocate based on total nur children from low-income families enrolle
- LEA must first allocate funds to eligible ses that exceed 75% poverty in rank order radless of grade span.

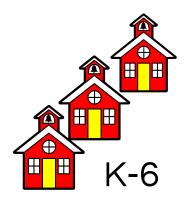
### Single Attendance Example

Campus	Low-Income %	Residing Enrollment	# Low- Income	Per-Pupil Allocation	Total Allocation
Rose Elementary (K-6)	51%	540	275	\$200	\$55,000
Daisy Middle School (7-9)	50%	600	300	\$250	\$75,000
Bluebonnet High School (10-12)	36%	475	171	Not Served	\$0
Total Campus Allocation					\$130,000

<sup>\*</sup>A Single Attendance district may allocate funds without regard to rank order.

### Multiple Attendance Allocations

A Multiple Attendance Area district must allocate funds to campuses in rank order on the basis of the total number of low-income students residing in <u>each</u> attendance area.







## Multiple Attendance District Allocation Options



An LEA is not required to allocate the same per pupil amount to each area or school.

- The LEA must <u>not</u> allocate to schools with lower poverty rates a higher per pupil amount than it allocates to schools with higher poverty rates.
- In determining the per pupil allocation, remember the purpose of Title I,
   A funding to enable children who are most at risk to meet the state's performance standards

## Multiple Attendance Example

Campus	Low- Income %	Residing Enrollment	# Low- Income	Per-Pupil Allocation	Total Allocation
Rose Elementary (K-6)	51%	540	255	\$200	\$51,000
Lily Elementary (K-6)	42%	515	216	\$185	\$39,960
Orchid Elementary (K-6)	64%	520	333	\$210	\$69,930
Daisy Middle School (7-9)	50%	600	300	\$200	\$60,000
Bluebonnet High School (10-12)	36%	475	171	Not Served	\$0
	Total C	Campus Alloc	ations		\$220,890

### Title I - Rank & Serve - \*New with ESSA

- Under NCLB, multiple attendance LEAs (i.e. with more than one EL, MS, or HS campus or with 1,000 or more students Brownwood, San Angelo, SF Del Rio and TLCA) were to rank campuses from highest to lowest poverty % and were required to serve those with ≥75% low-income.
- Under ESSA, those same districts may choose to lower the threshold to 50% for high schools.

NCLB Ranking	– Strict Perce	entage	ESSA Ranki	ing by % (50%	HS)
School	% Poverty	# Students	School	% Poverty	# Students
Albemarle EL	92%	82	Albemarle EL	92%	82
Lincoln MS	87%	90	Lincoln MS	87%	90
Roosevelt EL	79%	40	Roosevelt EL	79%	40
Scott EL	74%	56	Washington HS	70%	160
Washington HS	70%	160	Brennan HS	52%	92
Toshiba Charter EL	59%	119	Scott EL	74%	56
Key MS	58%	47	Toshiba Charter EL	59%	119
Brennan HS	52%	92	Key MS	58%	47
Smith HS	49%	15	Smith HS	49%	15

## Allocating Title I, A Funds Special Considerations



- LEA that opts to serve schools at or below 75% poverty using grade span groupings may determine different per pupil amounts for different grade spans as long as those amounts do not exceed the amount allocated to any school above 75% poverty.
- Per pupil amounts within grade spans may also vary as long as the LEA allocates to areas or schools with higher poverty rates a higher per pupil amount than it allocates to schools with lower poverty rates.

## SC5000 - ESSA Application

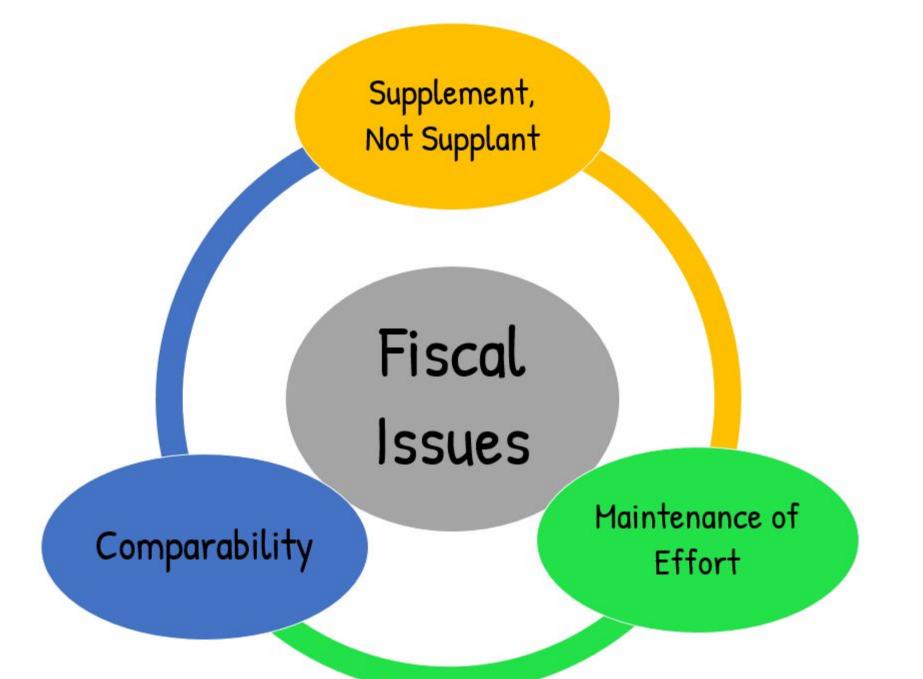
SC5000 - Title I, Part A Campus Selection

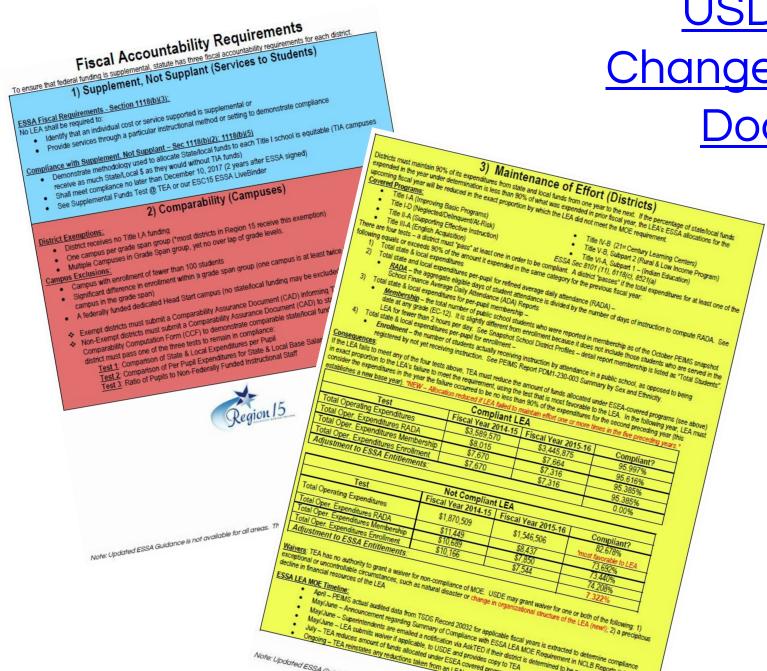
#	Total Campus Enroll.	Campus Low Inc %	Basis of Eligibility	Title I, Part A Campus Status	# Students Served TA Campus	TA Prog Assur	SW Prog Assur	Other	Consolidated Funds	Per Pupil Amt
001	- Smith H	ligh School								09-12
1.	147	40	Residing	SW			Х		Title-I A Only	\$381.88
041	- Smith J	unior High	:							06-08
2.	146	56	Residing	SW			Х		Title-I A Only	\$366.13
101	- Smith E	lementary								EE-05
3.	274	76	Residing	SW			Х		Title-I A Only	\$372.46
Tot	als									
Tit	le I, A Er	ntitlement	Amount	\$ 136,07	9	Total (	Campu	s Allocation	\$ 130,033	j

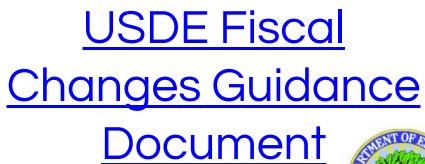
## SC5000 - Basis of Eligibility

- 1. **None** no students enrolled; 0% low-income
- 2. **Residing** most campuses use this
- 3. **Enrolled** used for charter schools or magnet schools
- 4. **Ed-Flex** waiver used to operate Schoolwide campus
- 5. <u>One Year Transition</u> now ineligible for Title I (this choice allows one more year of Title I service)
- 6. <u>SWP</u> Schoolwide Previous Year use when low income % drops below threshold (TEA prefers this choice over Feeder Pattern)
- 7. <u>Feeder Pattern</u> use when low income % is below threshold but feeder schools are eligible
- 8. Optional Method (Rare) see Campus Selection Other Options handout
- 9. <u>Direct Certification</u> use for Community Eligibility Provision

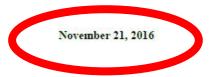
# Fiscal Issues







Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA)



## Supplement, Not Supplant

#### 1) Supplement, Not Supplant (Services to Students)

#### ESSA Fiscal Requirements - Section 1118(b)(3):

No LEA shall be required to:

- Identify that an individual cost or service supported is supplemental or
- Provide services through a particular instructional method or setting to demonstrate compliance

#### Compliance with Supplement, Not Supplant - Sec 1118(b)(2); 1118(b)(5)

- Demonstrate methodology used to allocate State/local funds to each Title I school is equitable (TIA campuses receive as much State/Local \$ as they would without TIA funds)
- Shall meet compliance no later than December 10, 2017 (2 years after ESSA signed)
- See Supplemental Funds Test @ TEA or our ESC15 ESSA LiveBinder

- Non-Regulatory Guidance delayed...
- Supplement, not supplant requirement retained.
- Language is revised that <u>seems</u> to remove the three supplanting presumptions for Targeted Assistance & District-Level Initiatives:
  - 1. Program is required by state/local law
  - 2. Program was funded in prior years with state/local funds
  - 3. Program is being provided to non-Title I students with state/local funds



Section 1118 (b)(3)

Special Rule states that **no LEA shall be required to**:

- Identify that an individual cost or service supported is supplemental or
- Provide services through a particular instructional method or setting to demonstrate compliance



#### Compliance with Supplement, Not Supplant:

- LEAs must annually demonstrate that the methodology it uses to allocate state/local funds to each Title I campus ensures that the school receives all of the state/local funds it would otherwise receive it it were not a Title I school.
- In multiple sessions, we have mentioned the Supplemental Funds Test this is one way you could do this. See template in our ESSA Live Binder
  (Fiscal Requirements tab) <a href="www.esc15.net/essalivebinder">www.esc15.net/essalivebinder</a>

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#### Excerpt from Tami's ACET Notes - Cory Green's General Session:

<u>Supplemental Funds Test:</u> TEA's Grants website provides examples. You don't have to follow that. It may be more complicated than it has to be.

Example: LEA with 1 EL and 1 HS (less than 200 enrollment) - they
allocate strictly per pupil and it is OKAY! Does not have to be detailed.
Just show a methodology of your formula. Especially for small
districts - examples on TEA's website are way too complicated for
small LEAs.

Federal statute requires that LEAs receiving Title I, A funds must continue to maintain fiscal effort with State and Local funds.

#### 3) Maintenance of Effort (Districts)

Districts must maintain 90% of its expenditures from state and local funds from one year to the next. If the percentage of stateflocal funds expended in the year under determination is less than 90% of what was expended in prior fiscal year, the LEA's ESSA allocations for the upcoming fiscal year will be reduced in the exact proportion by which the LEA did not meet the MOE requirement.

Covered Programs:

- Title I-A (Improving Basic Programs)
- Title I-D (Neglected/Delinquent/At-Risk)
- . Title II-A (Supporting Effective Instruction)
- Title III-A (English Acquisition)

- Title IV-B (21st Century Learning Centers)
- Title V-B, Subpart 2 (Rural & Low Income Program)
- Title VI-A, Subpart 1 (Indian Education)

ESSA Sec 8101 (11), 6118(c), 8521(a)

There are four tests – a district must "pass" at least one in order to be compliant. A district "passes" if the total expenditures for at least one of the following equals or exceeds 90% of the amount it expended in the same category for the previous fiscal year:

- Total state & local expenditures
- 2) Total state and local expenditures per-pupil for refined average daily attendance (RADA) -
  - <u>RADA</u> the aggregate eligible days of student attendance is divided by the number of days of instruction to compute RADA. See School Finance Average Daily Attendance (ADA) Reports
- Total state & local expenditures for per-pupil membership
  - <u>Membership</u> the total number of public school students who were reported in membership as of the October PEIMS snapshot
    date at any grade (EC-12). It is slightly different from enrollment because it does not include those students who are served in the
    LEA for fewer than 2 hours per day. See Snapshot School District Profiles detail report membership is listed as "Total Students"
- Total state & local expenditures per-pupil for enrollment
  - Enrollment the number of students actually receiving instruction by attendance in a public school, as opposed to being
    registered by not yet receiving instruction. See PEIMS Report PDM1-230-003 Summary by Sex and Ethnicity.

#### onsequences:

If the LEA fails to meet any of the four tests above, TEA must reduce the amount of funds allocated under ESEA-covered programs (see above) in exact proportion to the LEA's failure to meet the requirement, using the test that is most favorable to the LEA. In the following year, LEA must consider the expenditures in the year the failure occurred to be no less than 90% of the expenditures for the second preceding year (this establishes a new base year). "NEW – Allocation reduced if LEA failed to maintain effort one or more times in the five preceding years."

	Compliant LE	Α	11-11
Test	Fiscal Year 2014-15	Fiscal Year 2015-16	Compliant?
Total Operating Expenditures	\$3,589,570	\$3,445,875	95.997%
Total Oper. Expenditures RADA	\$8,015	\$7,664	95.616%
Total Oper. Expenditures Membership	\$7,670	\$7,316	95.385%
Total Oper. Expenditures Enrollment	\$7,670	\$7,316	95.385%
Adjustment to ESSA Entitlements:	1517.7		0.00%

	Not Compliant	LEA	a garagana
Test	Fiscal Year 2014-15	Fiscal Year 2015-16	Compliant?
Total Operating Expenditures	\$1,870,509	\$1,546,506	82.678% *most favorable to LEA
Total Oper. Expenditures RADA	\$11,449	\$8,437	73.692%
Total Oper. Expenditures Membership	\$10,689	\$7,850	73.440%
Total Oper. Expenditures Enrollment	\$10,166	\$7,544	74.208%
Adjustment to ESSA Entitlements			7.322%

Waivers: TEA has no authority to grant a waiver for non-compliance of MOE. USDE may grant waiver for one or both of the following: 1) exceptional or uncontrollable circumstances, such as natural disaster or change in organizational structure of the LEA (new!); 2) a precipitous decline in financial resources of the LEA

#### ESSA LEA MOE Timeline:

- April PEIMS actual audited data from TSDS Record 20032 for applicable fiscal years is extracted to determine compliance
- May/June Announcement regarding Summary of Compliance with ESSA LEA MOE Requirement in NCLB Reports is transmitted
- May/June Superintendents are emailed a notification via AskTED if their district is determined to be non-compliant
- May/June LEA submits waiver if applicable, to USDE and provides copy to TEA
- July TEA reduces amount of funds allocated under ESEA covered programs
- Ongoing TEA reinstates any reductions taken from an LEA's allocation, upon notification by USDE of waiver granted

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#### 3) Maintenance of Effort (Districts)

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#### **Covered Programs:**

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- Title I-D (Neglected/Delinquent/At-Risk)
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Test	Fiscal Year 2014-15	Fiscal Year 2015-16	Compliant?
Total Operating Expenditures	\$3,589,570	\$3,445,875	95.997%
Total Oper. Expenditures RADA	\$8,015	\$7,664	95.616%
Total Oper. Expenditures Membership	\$7,670	\$7,316	95.385%
Total Oper. Expenditures Enrollment	\$7,670	\$7,316	95.385%
Adjustment to ESSA Entitlements:			0.00%

	Not Compliant	LEA	1 63 00 0-
Test	Fiscal Year 2014-15	Fiscal Year 2015-16	Compliant?
Total Operating Expenditures	\$1,870,509	\$1,546,506	82.678% *most favorable to LEA
Total Oper. Expenditures RADA	\$11,449	\$8,437	73.692%
Total Oper. Expenditures Membership	\$10,689	\$7,850	73.440%
Total Oper. Expenditures Enrollment	\$10,166	\$7,544	74.208%
Adjustment to ESSA Entitlements:			7.322%

<u>Waivers</u>: TEA has no authority to grant a waiver for non-compliance of MOE. USDE may grant waiver for one or both of the following: 1) exceptional or uncontrollable circumstances, such as natural disaster or change in organizational structure of the LEA (new!); 2) a precipitous decline in financial resources of the LEA

#### ESSA LEA MOE Timeline:

- April PEIMS actual audited data from TSDS Record 20032 for applicable fiscal years is extracted to determine compliance
- May/June Announcement regarding Summary of Compliance with ESSA LEA MOE Requirement in NCLB Reports is transmitted
- May/June Superintendents are emailed a notification via AskTED if their district is determined to be non-compliant
- May/June LEA submits waiver if applicable, to USDE and provides copy to TEA
- July TEA reduces amount of funds allocated under ESEA covered programs
- Ongoing TEA reinstates any reductions taken from an LEA's allocation, upon notification by USDE of waiver granted



#### **New waiver under ESSA!**

A change in the organizational structure of the LEA

CATEGORY	FUNCTION
Instruction	11
Instructional Leadership (previously Administration)	21
Instructional Leadership (previously Administration)	12
Curriculum Development and Instructional Staff Development	13
School Leadership	23
Guidance and Counseling Services	31
Social Work Services	32
Health Services	33
Student (Pupil) Transportation	34
Deficits for Co-curricular/Extracurricular Student Body Activities	36
<b>Deficits</b> for Food Services	35
General Administration	41
Plant Maintenance and Operation	51
Data Processing Services	53

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#### Expenditures included for MOE calculations must be:

- From State and local funds for free public education; and
- For administration, instruction, attendance and health services, pupil transportation services, operation and maintenance of plant, fixed charges, and net expenditures to cover deficits for food services and student body activities.

Expenditures **excluded** for MOE calculations are any:

- Expenditures for community services, capital outlay, debt service or supplemental expenses made as a result of a Presidentially declared disaster; and
- Expenditures made from funds provided by the Federal government.

## **MOE Timeline**

WHEN DATA IS REVIEWED	DETERMINATION YEAR	SCHOOL YE	ARS (	COMPARED	FUNDING IMPACTED  (IF NON-COMPLIANT)
Ci 201/	FY15	FY15		FY14	FY17
Spring 2016	(2014-15)	(2014-15)	VS	(2013-14)	(2016-17)
C: 2047	FY16	FY16		FY15	FY18
Spring 2017	(2015-16)	(2015-16)	VS	(2014-15)	(2017-18)
C: 2049	FY17	FY17		FY16	FY19
Spring 2018	(2016-17)	(2016-17)	VS	(2015-16)	(2018-19)



**Change with ESSA**: No penalty for failing to meet MOE as long as there has not been another failure in the last five years.

#### TEXAS EDUCATION AGENCY

### Compliance with NCLB LEA Maintenance of Effort Requirement FY 2016

TEA posted these FY16 reports to GFFC Reports on May 15, 2017

If LEA had failed all 4 tests, funding for 2017-18 would have been impacted.

Region	CDN	LEA Name		Status	Adjustment (b)
15				COMPLIANT	0.000 %
Line Nbr	Function		Comparison Year	Current Year	
(a)	Code	Function Code Description	2014-2015	2015-2016	Test Result (c)
01	11	Instruction	\$4,850,117	\$5,085,035	
02	12	Instructional Resources and Media Services	\$148,075	\$149,835	
03	13	Curriculum and Instructional Staff Development	\$39,423	\$52,623	
04	21	Instructional Leadership	\$0	\$0	
05	23	School Leadership	\$527,763	\$507,458	
06	31	Guidance and Counseling Service	\$246,525	\$244,721	
07	32	Social Work Services	\$0	\$0	
08	33	Health Services	\$53,128	\$54,453	
09	34	Student (Pupil) Transportation	\$243,119	\$219,000	
10	35	Food Services (Deficit only)	\$0	\$0	
11	36	Cocurricular/Extracurricular Activities (Deficit only)	\$0	\$0	
12	41	General Administration	\$495,118	\$567,742	
13	51	Plant Maintenance and Operations	\$973,232	\$962,064	
14	53	Data Processing Services	\$307,229	\$284,503	
15		Total Operating Expenditures (Add 01-14)	\$7,883,729	\$8,127,434	Pass
16		Refined Average Daily Attendance	893.887	881.053	
17		Total Operating Expend. per Pupil (Refined ADA) (15/16	\$8,820	\$9,225	Pass
18		Membership	963	955	
19		Total Operating Expend. per Pupil (Membership) (15/18	\$8,187	\$8,510	Pass
20		Enrollment	964	958	
21		Total Operating Expend. per Pupil (Enrollment) (15/20)	\$8,178	\$8,484	Pass

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In this example, the LEA is <u>not subject to sanctions</u> for failing MOE in fiscal year (FY) 2016

Compliance review fiscal year	FY 2016	Noncompliant
1st preceding fiscal year	FY 2015	Compliant
2 <sup>nd</sup> preceding fiscal year	FY 2014	Compliant
3 <sup>rd</sup> preceding fiscal year	FY 2013	Compliant
4 <sup>th</sup> preceding fiscal year	FY 2012	Compliant
5 <sup>th</sup> preceding fiscal year	FY 2011	Compliant

### **Maintenance of Effort**

- In this example, the LEA <u>is</u> subject to sanctions for failing MOE in fiscal year (FY) 2016.
- Sanctions: TEA reduces the 2017-18 school year (FY2018) covered program allocations in the exact proportion by which the LEA fails to meet the requirement by falling below 90%

Compliance review fiscal year	FY 2016	Noncompliant
1st preceding fiscal year	FY 2015	Compliant
2 <sup>nd</sup> preceding fiscal year	FY 2014	Compliant
3 <sup>rd</sup> preceding fiscal year	FY 2013	Noncompliant
4 <sup>th</sup> preceding fiscal year	FY 2012	Compliant
5th preceding fiscal year	FY 2011	Compliant

## Maintenance of Effort Resources

- TEA has developed an Excel tool for LEAs to use in determining compliance with the ESSA LEA MOE requirement.
- The calculation performed by the ESSA MOE determination calculation tool is an estimate only and does not duplicate TEA's exact calculation process.
- The results of TEA's calculation will be the basis of the final MOE determination.

#### Link on TEA Website for MOE Calculation Tool:

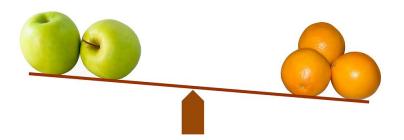
https://tea.texas.gov/WorkArea/linkit.aspx?LinkIdentifier=id&ItemID=25769809 316&IibID=25769809318

## Comparability

## **Comparability**

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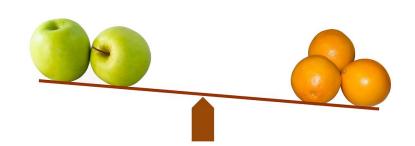
LEAs must demonstrate that Title I schools are receiving state and local funds to provide services that are at least equal to or greater than services provided at non-Title I schools.



## Comparability

#### **Two Parts:**

- <u>Comparability Assurance Document</u> All LEAs that receive Title I-A funding must complete and submit the <u>Comparability Assurance Document</u> (<u>CAD</u>)
- Comparability Computation Form All NON-EXEMPT LEAs must submit a CCF.
- Due November 30, 2017.



#### **LEA Exemptions:**

- LEA receives no Title I-A funding
- One campus per grade span group (most ESC15 LEAs receive this exemption)
- Multiple campuses in grade span group, yet no overlap of grade levels

Comparability Resources on the TEA website

\*TEA will provide training modules early this week.\*

## Administrative Issues

## Allowable Expenditures

## **Allowable Costs**

- Comprehensive Needs Assessment (CNA)
  - Does the expenditure tie back to a need?
- Campus Improvement Plan (CIP)
  - Does the expenditure have an activity in the CIP



- How will the campus measure the impact on student achievement?
- Are the needs of students at risk of not meeting State Standards being met?



## Allowability of Costs (200.403-405)

- a. Necessary and Reasonable
  - Necessary for the performance of the program
  - Reasonable: does not exceed that which would be incurred by a prudent person under the circumstances
  - Allocable to the award
- b. Conforms to limitations or exclusions
- c. Consistent with policies and procedures

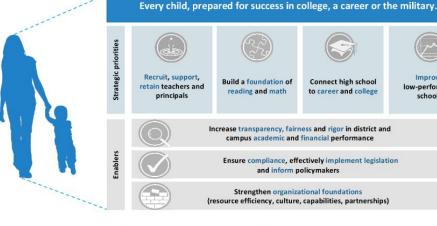


## Allowability of Costs (200.403-405)

- d. Treated Consistently
  - A cost cannot be assigned as a direct cost for the same purpose that it has been allocated as an indirect cost
- e. Determined in accordance with Generally Accepted Accounting
  - Principles
- f. Not used to meet cost sharing requirements
- g. Adequately documented



## **TEA Strategic Priorities**











Build a foundation of reading and math

Increase transparency, fairness and rigor in district and campus academic and financial performance

Ensure compliance, effectively implement legislation and inform policymakers

Strengthen organizational foundations (resource efficiency, culture, capabilities, partnerships)



#### Priority #1—Recruit, Support, and Retain Teachers and Principals

Every Student Succeeds Act (ESSA) Federal Funding Programs

Recommended Initiatives and Best Practices	State & Local	ESSA								
		Title I				Title II		Title III	Title IV	
		A*TT	1003 (a)* †	C.	D.	A*	B+1	A.	A*	B*1
Recommended Uses of ESSA Funds			a 100 0				was the same	100 100 100		
Instructional leadership development focused on the observation / feedback cycle	X	X	X	X	X	X	X	X	X	
Principal support and supervision	X	X	X	X	X	X	X	X	X	
Strategic Compensation	X	X	X	X	X	X	X	X	X	
Teacher leader / Master teacher programs	X	X	X		3 8	X	X	3 8		
Other Best Practices		Total Control			100			100		
Teacher mentoring and coaching	X	X	X		X	Х	X	X	X	
Induction programs for new teachers	X	X	X	-	X	Х	Х	A 400 A	X	
Systemic Human Resources Office improvements, including targeted recruiting and effective screening of teacher and principal employment applicants	х	Х	х		29	×	Х	95 ye		
Instructional coaching for teachers and principals, to include teacher mentoring, for serving students with disabilities.	х	х	х		х	×	Х	Х	х	
Instructional coaching for implementing tiered behavior intervention models.	X	X	X	X	3 6	Х	X	2 2	X	X

<sup>\*</sup>Specific program requirements must be met for eligible teacher, student and/or parent participation, the instructional focus of funded activities, and supplemental uses of funds. LEAs and schoollevel activities must be aligned and should be appropriately scaled to meet LEA or campus needs.

† Not included in 2017-2018 ESSA Federal Consolidated Application # Title I, Part A refers to schoolwide programs

<sup>\*\*</sup> ALL staff =certified teachers; tutors during school day, before and after school, evenings, and weekends; specialized instruction support staff; principals; other school leaders.

### Supplement, Not Supplant

#### Title I, Part A

- For compliance: LEA shall demonstrate a
  methodology used to allocate State and Local funds to each
  school, this ensures that schools receive all the State and Local
  funds it would otherwise receive if it were not receiving Title I funds
- Supplemental Funds Test
- TEA website at http://tea.texas.gov/grants/schoolwidefundingandaccounting1/

### Supplement, Not Supplant

#### Title I, Part A

- LEA does not have to identify individual costs or services as supplemental or,
- Provide services through a particular instructional method or in a particular instructional setting to demonstrate compliance
- Activities still must be addressed in the CNA, CIP, and Evaluation

All Other ESSA grants still have the Supplement, Not Supplant requirements



#### Resources

- Texas Education Agency Grants
  - The <u>New EDGAR</u> page at TEA
    - PDF version of the New EDGAR
    - New EDGAR Regulations FAQ
    - General and Fiscal Guidelines

#### The <u>Administering a Grant</u> page at TEA

- Prior Approval, Disclosure, and Justification Forms under the New EDGAR
- Budgeting Costs Guidance Handbook



# **Testing of Expenditures**

### Testing of Grant Expenditures

#### Payroll transaction attributes tested

- Was the position approved in the budget?
- Was the job description signed, dated, and did it describe activities that are allowed in the grant? Was it updated to reflect current job duties?
- Was the position supported by laws, rules, regulations and the grant application?
- Is the program/activity/strategy that is being funded described in the district/campus improvement plan?





### Testing of Grant Expenditures

#### Payroll transaction attributes tested

- Did the payroll records match the source(s) of funding?
- Did the teacher/paraprofessional meet the state certification(teacher) or highly qualified(paraprofessional) requirements?
- Was the payroll cost incurred within the allowable grant period?





# Tracking Personnel Expenses 200.430(i)

Payroll transaction attributes tested

 All employees must maintain documentation showing that their salaries are allocable to a federal program 200.403(a);

 That documentation must be based on records that accurately reflect the work performed





#### Time and Effort Documentation

Payroll transaction attributes tested

- T & E documentation maintained for the employee worked on a single cost objective or was 100% funded by the grant
- T & E documentation maintained for the employee worked on a multiple cost objectives
- After-the-fact distribution of actual activity
- Accounted for the total activity for which the employee was compensated
- Time Allocation agrees to the Payroll Cost Allocation

#### Substitute System of Time and Effort

#### Conditions for Employee Participation

- Must currently work on a schedule that includes multiple activities or cost objective that must be supported by monthly PARs
- Must work on specific activities or cost objectives based on a predetermined, consistent schedule
- May not work on multiple activities or cost objectives at the exact same time (example – federal program director)

# Testing of Grant Expenditures



#### Non-Payroll transaction attributes tested

- Was the expenditure reasonable and necessary to further the statutory purpose, or did it pertain to a required or authorized activity?
- Was the cost of the goods or services chargeable or assignable to the grant in accordance with the relative benefits received?
- Was the expenditure supplemental to other non-federal programs? (Depends on the program)
- Did the accounting record include an original and complete internal accounting document (i.e., executed contract, purchase order, payment authorization form, expense reimbursement form, travel reimbursement form, etc.)?

# Testing of Grant Expenditures



Non-Payroll transaction attributes tested

- Did the accounting record include an original and complete third-party document (i.e., utility billing statement, itemized receipt, itemized invoice, etc.)
- Was an approved purchase order issued prior to the invoice date?
- Did the accounting record indicate that the transaction was approved by a(n) authorized individual(s)?
- Was the item approved in the program budget per the grant application? (Note if the cost and/or activity was approved on a specific line item or schedule, where applicable.)
- Did the purchase meet the appropriate procurement standards?

# **AMENDMENTS**

#### **Amendments**

- After TEA approves the district's grant application, the district can amend if changes occur to the approved program.
- Amendments need to be made when significant changes are made to the program BEFORE you spend the funds.
- EX: Adding a new position, open a new object code, etc.
- Amendment Submission Guidance:

Administering a Grant on TEA website

"When to Amend a Grant"



# SRSA/REAP

#### **REAP/Transferability**

#### **NEW**

- Title V, Part A Funding Transferability P.L. 114-95 Sec. 5102 to Sec. 5103
- Title V, Part B
  - Subpart 1 Small Rural Schools Achievement Program (SRSA) - P.L. 114-995 Sec. 5202
    - SRSA Grant
    - Alternative Fund Use Authority for SRSA eligible LEAs (REAP)
  - Subpart 2 Rural and Low Income Schools Program (RLIS) –
     P.L. 114-995 Sec. 5221 to Sec. 5225



#### Title V, Part A - Funding Transferability

- The purpose is to allow LEAs the flexibility to target Federal funds to the programs and activities that most effectively address the unique needs
- LEA may transfer all or any lesser amount of funds **TO** the following(5103(b)):
  - Title I, Part A
  - Title I, Part C
  - Title I, Part D
  - Title II, Part A
  - Title III, Part A
  - Title IV, Part A
  - Title V, Part B NEW

#### **FROM** the following (5103(b)(2)):

- Title II, Part A
- Title IV, Part A



#### Funding Transferability - continued

- Funds that are redirected from applicable fund sources and expended for alternative uses, must be operated under the rules, regulations, and guidelines of the program to which they are being redirected.
- Before an LEA may transfer funds from a program subject to equitable services requirements, it must engage in timely and meaningful consultation with appropriate private school officials (Section 5103(e)(2)). With respect to the transferred funds, the LEA must provide private school students and teacher equitable services under the program(s) to which, and from which, the funds are transferred, based on the total amount of funds available to each program after transfer.

#### **REAP and Funding Transferability**

- Funds are not physically transferred on the SAS between fund codes or budget columns.
- Funds maintain their original fund code, class/object code, and other required account code structure following generally accepted accounting principles
- Only the allowable uses of the funds are redirected to allowable alternative uses.
- An LEA must apply the Title I set-aside provisions to funds it transfers to its Title I allocation





#### Title V, Part B - Rural Education Initiative

Also cited as the Rural Education Achievement Program (REAP)

The purpose 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
- 2. receive formula allocations in amounts too small to be effective in meeting their intended purposes.

### Title V, Part B - Subpart 1 - SRSA

- The purpose of the Small, Rural School Achievement (SRSA)
   program is to provide rural LEAs with financial assistance to function initiatives aimed at improving student academic achievement.
- The SRSA Program provides funds to very small, rural LEAs
  - The USDE awards these grants directly to eligible LEAs
    - More information can be found at <a href="https://www2.ed.gov/programs/reapsrsa/index.html">https://www2.ed.gov/programs/reapsrsa/index.html</a>
  - SRSA-eligible LEAs also qualify for the Alternative Fund Use Authority §(a) & (c)) that provides additional flexibility in how they can expend federal education funds.
    - This Alternative Fund Use Authority is what was previously know as REAP-flex

#### SRSA - continued

#### NEW

- All eligible LEAs will need to apply every year through G5
- USDE opens up the SRSA application period generally in April
- LEAs that are dual eligible for SRSA and RLIS have to decide which grant without knowing the funds for either.



#### Title V, Part B, Subpart 2 - RLIS

- The purpose of the Rural and Low-Income School Program (RLIS) is to provide financial assistance to rural districts to meet local academic needs.
- RLIS funds a variety of activities including teacher recruitment and professional development, support for education technology, parental involvement activities, and more.

 NEW – This grant application will have a new PS3002 which looks like the PS3001

Texas Education Agency

#### **REAP Resources**

- Resources for Subpart 1 REAP and Subpart 2 REAP on TEA website for
  - Statute
  - Policy Guidance
  - Eligibility List

**REAP Resources** 

# **Coordination of Funds**

#### **Coordination of Funds**

- Title I, Part A programs must coordinate and integrate Federal, State, and local services and programs, including programs supported under the ESEA, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.
- The CIP must demonstrate how the campus will coordinate and integrate federal, state, and local services and programs.
- Coordinating funds is when a campus pays for an activity using multiple fund sources and tracks each portion to an allowable program expenditure.



# **Consolidation of Funds**

#### Administrative/Schoolwide

#### **Administrative**

#### **Consolidated Administrative Funds**

- A school district in Texas may elect to consolidate administrative funds from any of the programs under ESEA/ESSA and any other programs designated by the United States Secretary of Education.
- This request and approval is accomplished through the ESEA/ESSA
   Consolidated Application submittal and approval process.

Part 1: Available funding		
	Title I, Part A	Title I, Part C Migrant
NOGA ID Number		
Current FY Planning Amount		
Maximum Entitlement		
Estimated Carryover		
Actual Carryover		
Reallocation Funds		
Total Funds Available		
Prior Year Project	▼ PYP	PYP
Consolidated Administrative Funds	C Yes C No	C Yes C No



#### **Consolidated Administrative Funds**

- TEA website has more information on advantages, eligible programs, documentation required, etc.
- This web page, which is divided into five parts, provides details about how LEAs can take advantage of the flexibility offered by consolidating their administrative funds and administering their ESSA programs as a whole
- Specific Form to complete

<u>Consolidated Administrative Funds</u> or <a href="http://tea.texas.gov/grants/consolidatedadmin1/">http://tea.texas.gov/grants/consolidatedadmin1/</a>



# Schoolwide Programs

#### Schoolwide Programs

- Campuses with 40% or more poverty may use Title I, A funds alor with other Federal, State, and local funds to upgrade the entire educational program in school to improve the academic performance of all students. This also includes the Ed-Flex Schoolwide campuses.
- The campus must conduct a comprehensive needs assessment of the entire school
- Using data from the needs assessment develop a comprehensition
- A School must also evaluate and update the comprehensive plc on an annual basis.



#### Schoolwide Programs - continued

- A campus is not required to identify specific students as eligible to participate in a schoolwide program, or to demonstrate that the services provided in the school with Title I, A funds are supplemental to services that would otherwise be provided.
- A campus may consolidate funds from Federal, State, and local sources to implement its comprehensive plan to unarada its entire educational program.





# Consolidated Options for Schoolwide Programs

1. <u>Full Consolidation</u> – this option involves pooling some or all of your campus's federal funds with some or all of your eligible state and local funds and provides the most flexibility in terms of operating a schoolwide program.



- Federal Consolidation this option involves pooling some or all of your campus's federal funds, but does not involve state or local funds.
- 3. <u>Title I, Part A</u> this option does not pool funds, but allows you campus to use its Title I, Part A allocation on a schoolwide basis.



# Resources for Consolidation of Funds for Schoolwide Programs



 More detailed information is available on the TEA website: <a href="http://tea.texas.gov/grants/schoolwideoptions/">http://tea.texas.gov/grants/schoolwideoptions/</a>



#### SEC. 1127. CARRYOVER AND WAIVER.

- (a) LIMITATION ON CARRYOVER- Notwithstanding section 421(b) of the General Education Provisions Act or any other provision of law, not more than 15 percent of the funds allocated to a local educational agency for any fiscal year under this subpart (but not including funds received through any reallocation under this subpart) may remain available for obligation by such agency for one additional fiscal year.
  - (b) WAIVER- A State educational agency may, once every 3 years, waive the percentage limitation in subsection (a) if —
  - (1) the agency determines that the request of a local educational agency is reasonable and necessary; or
  - (2) supplemental appropriations for this subpart become available.
  - (c) EXCLUSION- The percentage limitation under subsection (a) shall not apply to any local educational agency that receives less than \$50,000 under this subpart for any fiscal year.

https://www2.ed.gov/policy/elsec/leg/esea02/pg3.html#sec1127



An LEA that does not obligate all of the Title I, A funds that it was allocated for a given fiscal year may carry over the unobligated funds and obligate them during the succeeding fiscal year.



- Title I, A funds are available for a maximum of 27 months (15 + 12)
- The rules in effect when the funds are obligated apply
- Funds transferred into Title I, A are included in base.
- Carryover funds do not affect the base on which reservations are calculated—e.g., 1 percent for parent involvement
- Carryover applies as of September 30—not the end of the state's fiscal year.
- Funds that exceed the carryover limit may be reallocated by the State Education Agency.

How may carryover funds be used?

- An LEA has considerable discretion in using carryover funds:
  - Add to LEA's district reservations
  - Allocate to campuses with the highest poverty
  - Provide additional funds for specific activities—e.g., school improvement

What if an LEA does not spend all of the funds it was required to reserve for a specific purpose in a given year?

- The LEA must carry over the unspent funds and spend them for the specific purpose in the following year—in addition to the reservation for the following year.
- Unspent funds from required reservations are included in the carryover limitation





How does the carryover provision apply to equitable services for private school students?

- If an LEA provides equitable services for private school students, any carryover funds would be additional funds for the LEA's Title I, A program in general the following year.
- If the LEA does not provide equitable services, it must carry over the unobligated funds and spend them to provide equitable services the following year—in addition to the services private school students are entitled to in the following year.

2016-2017 is the last year for carryover of equitable services funds

### **Carryover Limitation**



Title I is limited to a 15% carryover

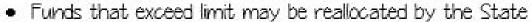
no more waivers with ESSA

Excess Carryover As Risk Indicator

- 25% or more, for grants other than Title I under ESSA
- Federal Carryover reports are available in the GFFC Reports and Data Collections

#### Carryover Funds

- Carryover does not affect the base on which reservations are calculated the following year
- Carryover applies as of September 30 (not the end of state's fiscal year)





- No more than 15% may be carried forward
- If entitlement is less than \$50,000, there is no limit
- May waive limitation once every 3 years, if reasonable and necessary

Limitations Use of Funds

- District may use their discretion (exceptions: Reservations & Private Non-Profit - see below)
  - May allocate to highest poverty campus(es)
  - · May add to reservations
  - May be used as additional funds for specific activities

 Carryover ended 2017-18 unless extenuating circumstances and LEA is unable to obligate all funds within grant period in a responsible manner, funds may remain available for the provision of equitable services under the respective program during subsequent school year. LEA must consult with appropriate PNP in determining how such carryover funds will be used. Private Non-Profit Required Reservations

 Must carryover and spend for the same purpose in the following year (ie money required to be reserved for Parent Involvement must be spent in Parent Involvement PLUS the required amount for the following year.

Guidance: document: NON-REGULATORY GUIDANCE: FISCAL CHANGES AND EQUITABLE SERVICES REQUIREMENTS UNDER THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965 (ESEA), AS AMENDED BY THE EVERY STUDENT SUCCEEDS ACT (ESSA)

# **Contact Information**

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