



# 2018 Statewide Federal Grants Training

October 4, 2018  
Austin Performing Arts Center  
Austin, Texas

October 8, 2018  
Education Service Center Region 17  
Lubbock, Texas

October 12, 2018  
Education Service Center Region 4  
Houston, Texas

# Agenda

- Updates on Federal Grants
- USDE Performance Review of ESSA
- EDGAR Compliance and Challenges
- SC3001 – Needs Assessment, Priorities and Outcomes
- Most Common Audit Findings for Federal Grants
- Private Nonprofit Schools and Equitable Services
- 2018-2019 Title I, Part A Monitoring
- Supplement, Not Supplant 2018-2019 Random Validations
- 2019-2020 ESSA/IDEA/Perkins Consolidated Application
- Q&A

## ■ Updates on Federal Grants



### Hurricane Grants Update

Project SERV – Awarded  
Federally declared counties

Restart – Awards still in process  
Federally declared counties

EIA – Awards still in process  
Any LEA enrolling a displaced student

HCY – Application to release next week  
LEAs enrolling displaced students who were also homeless (displaced at night time residence)

Restart II – coming later in the Winter

### Title I, Part A Comparability

Comparability Assurance Document (CAD) and Comparability Computation Form (CCF)  
Available: October 12, 2018

CAD will be an online survey, with an email confirmation  
CCF will be accessed and submitted via GFFC Reports and Data Collections Application

Due: November 16, 2018

### Expenditure Reporting (ER) Drawdowns

Timely and accurate

Less often, gives impression funds are not being used  
and are not necessary

### Competitive Grants

Review the “TEA Year in Advance – Competitive Grants” on a regular basis  
Cannot be emailed  
Must be hand delivered, mailed or couriered, and  
Must be received by 5 p.m. on the application due date

Review General and Fiscal Guidelines documents before submitting

TEA has reduced the number of reasons for disqualification, i.e., applications merely need to be received by 5pm on deadline, three copies submitted, and signed (not necessarily original) by Superintendent/CEO etc.

Blank fields and/or not including attachments will negatively impact an applicant's score and chances of receiving a grant

### **IDEA-B Formula and Preschool**

LEAs will receive an increase to their 2017-2018 supplemental awards.

Grants staff will begin budget adjustments for LEAs in November

Revised final expenditure reports now accepted through 10/30/19

### **Uses of Funds**

Comprehensive Needs Assessment

Documenting CNA, Identified Needs, and Use of Funds under ESSA

Evaluating Programs

### **Title IV, Part A Uses – School Safety**

#### Allowable

Metal detectors

Security

Training

#### NOT Allowable

Purchase Firearms

Purchase Ammunition

### **Monitoring**

FY2019 (current year)

TEA will require repayment for:

- questioned costs
- Policies
- Procedures

## 2018-2019 Final Amounts Release

Perkins Finals and Reallocation: November 9, 2018

ESSA Finals, Carryover, & Reallocation: November 26, 2018

IDEA Finals: December 10, 2018

Note: 27-month NOGA, No Carryover

## SC9000 – Annual Survey for Children in Local Facilities for Neglected/Delinquent Children

Available in eGrants starting October 22, 2018

Due December 5, 2018

## School Health and Related Services (SHARS)

Annual SHARS Reimbursement Report online survey  
due October 31, 2018

## Two Data Submission Systems

System	Reports
ESSA Reports	ESSA Programmatic Reports
GFFC Reports and Data Collections	Fiscal Compliance Reports

## Email Addresses

[ESSAsupport@tea.texas.gov](mailto:ESSAsupport@tea.texas.gov)

[GrantSupport@tea.texas.gov](mailto:GrantSupport@tea.texas.gov)

[GrantApplications@tea.texas.gov](mailto:GrantApplications@tea.texas.gov)

## School Safety Grants

Applied for 3 federal grant opportunities

To date, awarded 2 @ \$1M each

Still awaiting word on third

### **School Threat Assessment Teams**

This grant will be used to support the statewide development, implementation and operation of school threat assessment teams.

This statewide training program, which will be a collaborative effort between TEA, the Texas School Safety Center and SIGMA Threat Management, will properly equip school personnel with the skills needed to recognize, respond quickly to and prevent acts of violence across the state of Texas.

### **Statewide School Violence and Mental Health Training Program Grants**

An informal competitive grant program will assist Texas school districts in obtaining needed mental health training for staff and administrators. This training will serve the needs of students, while also providing awareness and connections to needed mental health services. The initial grants will be made available to three districts with recent school shooting events.

Additional school districts will be added to the grant program through a competitive application process over the next two years. All grant funds will be awarded to provide the training needed to meet the identified needs of the district to prevent school violence from occurring.

### **LEA Contract Guidance Coming**

Guidance document in progress

Estimated release Spring 2019

## **■ Debriefing on USDE Onsite Performance Review of ESSA**

- Online Self-Assessment Prior to Visit
- Date of Visit – August 7-10, 2018
- LEA Sites – San Antonio ISD and Edgewood ISD
- Potential Findings or Areas of Concern

## ▪ EDGAR Compliance and Challenges

### Key Sections of EDGAR

#### 34 CFR

- Part 75 – Direct Grant Programs
- Part 76 – State-Administered Programs
- Part 77 – Definitions that Apply to Dept Regs
- Part 81 – The General Education Provisions Act

#### 2 CFR Part 200 (Uniform Guidance)

- Subpart A – Acronyms and Definitions
- Subpart B – General Provisions
- Subpart C – Pre-Federal Award Requirements
- Subpart D – Post Federal Award Requirements
- Subpart E – Cost Principles
- Subpart F – Audit Requirements

### **200.403 Factors Affecting Allowability of Costs**

In order to be allowable, costs must be:

- Necessary, reasonable, and allocable
- Conform with federal law and grant terms
- Consistent with state and local policies
- Consistently treated
- In accordance with GAAP
- Not included as match or cost share
- Adequately documented

### **200.407 Prior Written Approval**

In order to avoid subsequent disallowance, subrecipients may seek prior written approval from TEA, or from the federal awarding agency (USDE) in advance of the incurrence of special or unusual costs.

### EDGAR Forms

- Conflict of Interest Disclosure
- Inventory Disposition Request
- Mandatory Disclosure
- Request to Add Program Income to Federal or State Grant Award and Expand Delivery of Programmatic Services

- Request for Approval of Special or Unusual Costs
- Request for Noncompetitive Procurement (Sole-Source) Approval
- Request for Other Noncompetitive Procurement Approval (Not Sole Source)

### Procurement Under EDGAR

2 CFR 200.318 – General Procurement Standards

2 CFR 200.319 – Competition

2 CFR 200.320 – Methods of Procurement to be Followed

2 CFR 200.213 – Suspension and Debarment

### Methods of Procurement

#### Micro-purchase

- Aggregate cost not to exceed \$10,000
- Price must be reasonable
- Distributed among qualified vendors, as applicable
- Intent is to reduce administrative burden for purchase of small items

#### Small Purchase

- Simple and informal method for purchases above \$10,000 but less than \$250,000
- Price or rate quotations from adequate number of sources (minimum of two or LEA policy)
- Use a selection matrix to document decision on vendor
- Choose the vendor that is most advantageous to the LEA (best fit)



*Even though EDGAR sets the threshold at \$250,000, state rules require any purchases of \$50,000 or more must use a competitive method of procurement*

### Sealed Bids or Competitive Proposals

- Under EDGAR, purchases at \$250,000 and above require competition
- A federal cost or price analysis is required
- Proposals must be solicited from an adequate number of qualified sources
- Read the requirements in 200.320 to determine which is more appropriate

## Noncompetitive Proposals

May be used only when one or more of these circumstances apply:

- The item is available only from a single source (sole source)
- The public exigency or emergency for the requirement will not permit a delay
- TEA expressly authorizes noncompetitive method in response to a written request from the subgrantee
- After solicitation of a number of sources, competition is determined inadequate

## Suspension and Debarment

Verification must be done by either:

Checking [www.SAM.gov](http://www.SAM.gov)

OR

Collecting a certification from the vendor



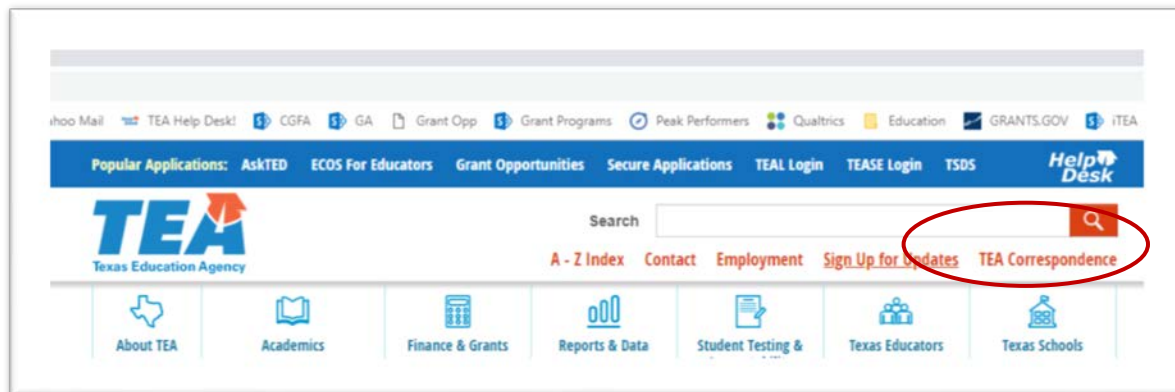
## EDGAR Micro-purchases and Increased Thresholds

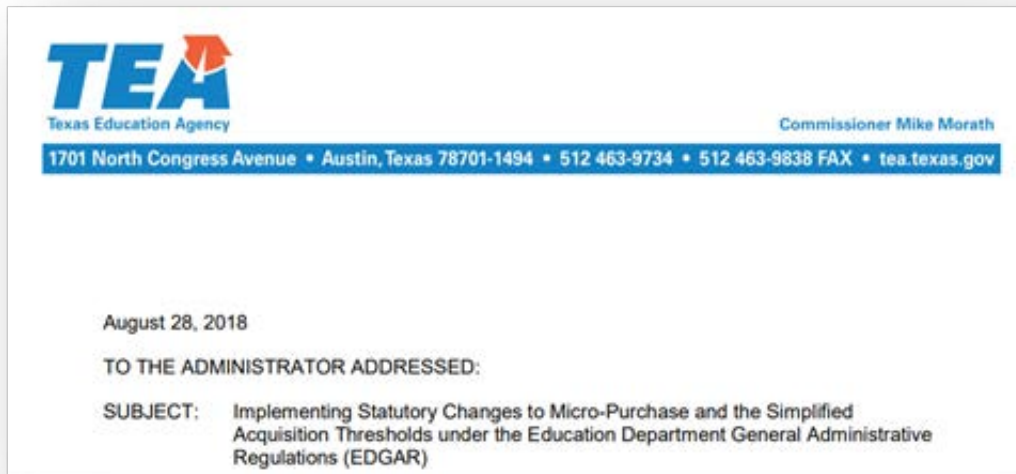
OMB Memo:

<https://www.whitehouse.gov/wp-content/uploads/2018/06/M-18-18.pdf>

TEA Statewide Guidance Letter on 8/28/18:

New Thresholds





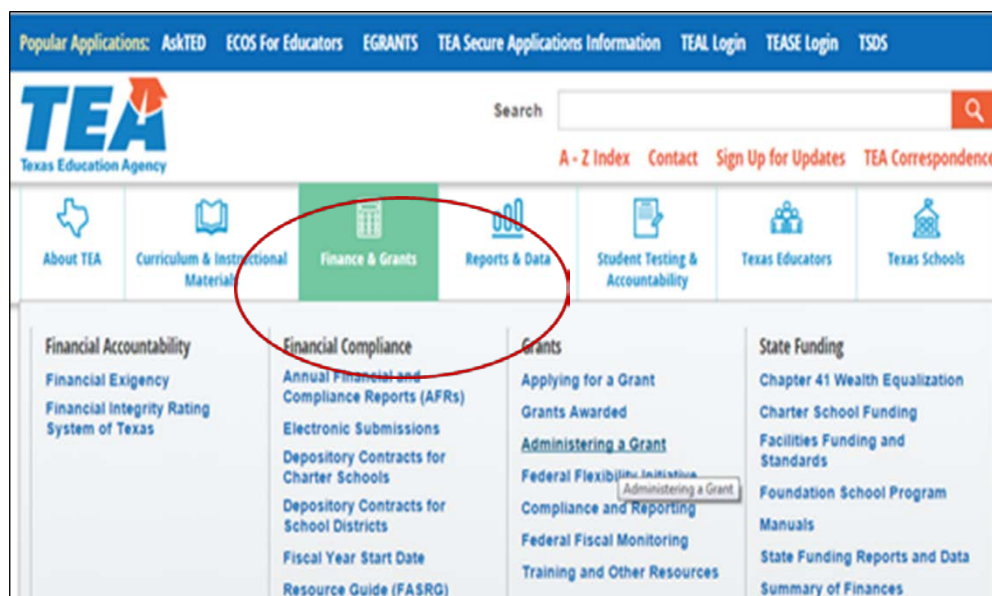
As of 7/1/18:

- \$10,000 for micro-purchases
- \$250,000 for small purchases

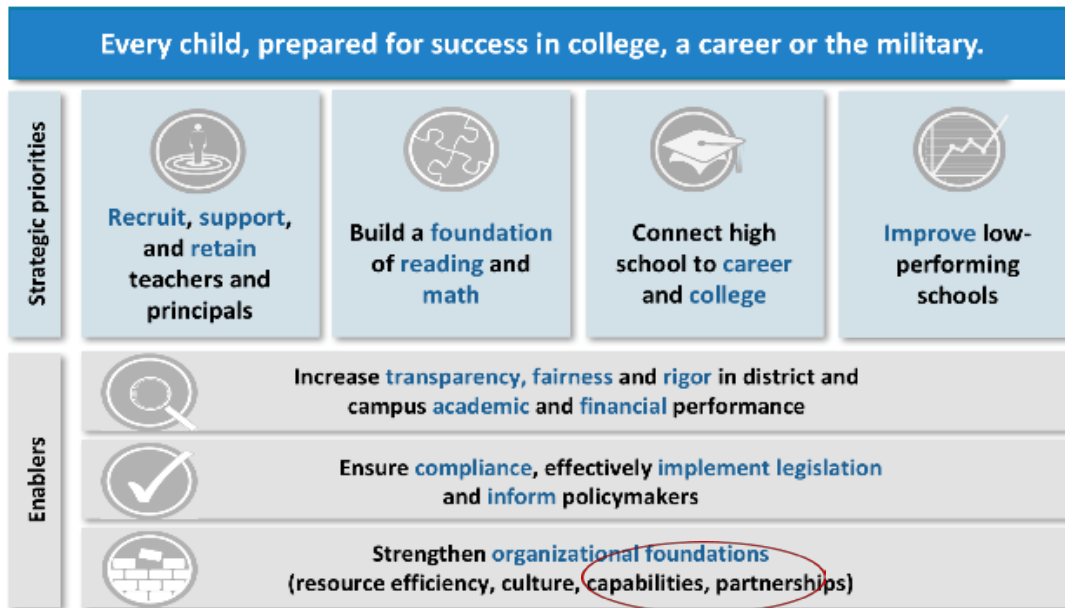


### EDGAR Resources

[www.tea.texas.gov](http://www.tea.texas.gov)



## ■ SC3001 – Needs Assessment, Priorities and Outcomes



### SMART Goals for Federal Grant Funds Resources – 2018-2019

## Student Achievement SMART Goals for Federal Grant Funds

This page will provide information about Schedule SC3001—Needs Assessment, Priorities, and Program Outcomes for ESSA and Perkins Federal Grant Programs, as it is available.

### Tools for LEAs

The following pages offer resources for continuous improvement planning, instructional best practices aligned to the State Consolidated Plan and TEA Strategic Priorities, and monitoring student outcomes.

[Strategic Priority #1: Recruit, Support, and Retain Teacher and Principals](#)

[Strategic Priority #2: Build a Foundation in Reading and Math](#)

[Strategic Priority #3: Connect High School to Career and College](#)

[Strategic Priority #4: Improve Low-Performing Schools](#)

## SC3001 Special Collection – 2018-2019

The purpose of the SC3001 - Needs Assessment, Priorities, and Program Outcomes is to capture data on LEA collaborative needs assessment and planning processes relevant to TEA's four Strategic Priorities.

This data will benefit student outcomes and the alignment of the use of its ESSA, Rural and Low Income, School Improvement, Perkins and other federal/state funding.

☐ LEA did not apply for funds from ANY of these programs: ESSA, Rural and Low Income, School Improvement, Perkins.

### TEA Strategic Priorities #1 - #4

[Help](#)

#### Purpose

After reviewing the relevant statewide data, meeting with the state's 20 regional Education Service Centers (ESCs), educators, parents, school board members, and employers, TEA has identified four Strategic Priorities, which will benefit student outcomes.

- #1: Recruit, Support, and Retain Teachers and Principals.
- #2: Build a Foundation in Reading and Math.
- #3: Connect High School to Career and College.
- #4: Improve Low-Performing Schools.

See also [TEA's Strategic Plan for 2019-2023](#) and [Student Achievement SMART Goals for Federal Grant Funds](#) documents available online.

Describe the LEA's identified needs below, and indicate the TEA Strategic Priority(ies) to which the LEA has aligned the use of its ESSA (programs in the ESSA Consolidated application), Rural and Low Income, School Improvement, Perkins, and other federal/state funding. Indicate locally-identified needs not aligned to TEA Strategic Priorities by selecting the "Not Aligned" checkbox.

## Part 1: List the LEA's Identified Needs by Strategic Priority and Program Outcomes

Identified Needs					
Identified Need	#1	#2	#3	#4	Not Aligned
1.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Part 2: Programs, Activities, and Funds Budgeted

LEA applied for funds from these programs in the <YYYY-YYYY> school year:

<input type="checkbox"/> ESSA	LEA applied as a member of an SSA for ALL ESSA funding sources: <input type="radio"/> Y <input type="radio"/> N
<input type="checkbox"/> Rural and Low Income	
<input type="checkbox"/> School Improvement	
<input type="checkbox"/> Perkins	LEA applied as a member of an SSA for Perkins: <input type="radio"/> Y <input type="radio"/> N

A. Program Measures and Goals				
Program	One Year Performance Measure (SMART goal)	Baseline Data	3-5-year Goal	Data Source(s)
Example: ESSA	The percentage of 3 <sup>rd</sup> grade students who meet or master grade level in reading and math will increase from 17% to 22% by May, 2018.	17%	37%	STAAR data
1. <input type="text"/>	<ul style="list-style-type: none"> <li>Select program from dropdown</li> <li>Enter one year SMART goal – <b>Maximum of 5</b></li> <li>Enter baseline data</li> <li>Enter 3-5 year goal</li> <li>Enter data source</li> </ul>			

## Dropdown Validation Requirements

		"LEA applied for funds..." checkbox selections			
	Required Program Measure and Goal (2A)	ESSA	RLIS	SI	Perkins
1	ESSA and Perkins	X	X	X	X
2	ESSA and Perkins	X	X		X
3	ESSA and Perkins	X		X	X
4	ESSA and Perkins	X			X
5	ESSA	X	X	X	
6	ESSA	X	X		
7	ESSA	X		X	
8	ESSA	X			
9	Perkins and (RLIS or SI)		X	X	X
10	Perkins and RLIS		X		X
11	Perkins and SI			X	X
12	Perkins				X
13	RLIS or SI		X	X	
14	RLIS		X		
15	SI			X	

### B. Programs or Activities

List the program or activity that addresses the needs identified in Part 1.	Is this a new program or activity?	#1	#2	#3	#4	Not Aligned
1. Enter program or activity – <b>Maximum of 10</b> • Indicate if program or activity is new • Indicate TEA Strategic Priority associated with program or activity. • <b>The TEA Strategic Priority must have been addressed in Part 1 Identified Needs</b>	<input type="radio"/> YES <input type="radio"/> NO	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<div> <input type="button" value="Add Line"/> <input type="button" value="Remove Line"/> </div>						

Not all Identified Needs reported in Part 1 are required to have an associated Program or Activity, but each TEA Strategic Priority indicated in Part 2B must be associated with an Identified Need and TEA Strategic Priority in Part 1.

C. Total Funds Budgeted to support TEA Strategic Priorities				
ESSA	Rural and Low Income	School Improvement	Perkins	Other
\$	\$	\$	\$	\$

- Each program selected in Part 2A must have a corresponding Total Funds Budgeted.
- Exception is for LEAs that are part of SSA for ESSA or Perkins. The system will allow members to enter a budgeted amount but not required. 0 will be allowed due to this exception.

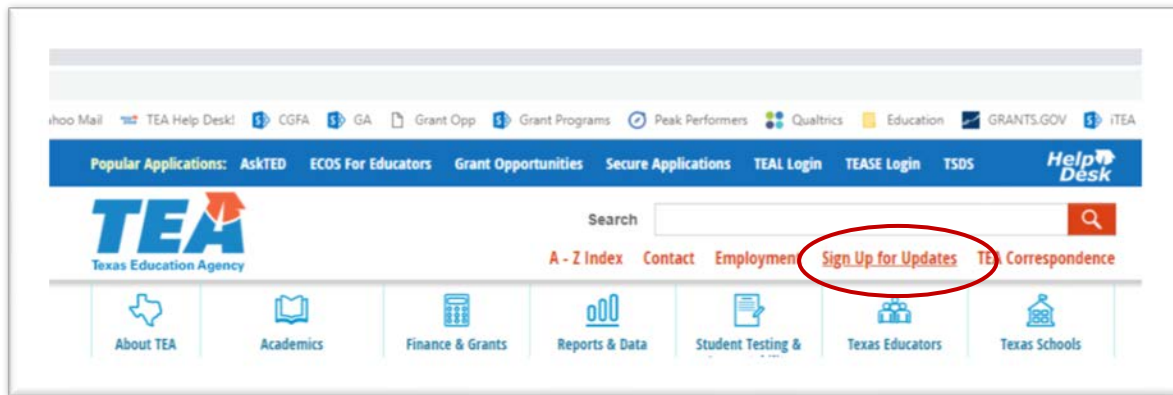
#### Part 4: Certification and Incorporation

Certification and Incorporation Statement	
I hereby certify that the information contained in this Special Collections Report is, to the best of my knowledge, correct and that the organization named above has authorized me as its representative to submit this data. I further certify that any ensuing program and activity will be conducted in accordance with all applicable Federal and State laws and regulations; application guidelines and instructions; provisions, assurances, and certification requirements; and the schedule submitted. It is understood by the applicant that this application constitutes an offer and, if accepted by the Texas Education Agency or renegotiated to acceptance, will form a binding agreement.	
Authorized Official	
First Name: <input type="text"/>	Initial: <input type="text"/> Last Name: <input type="text"/> Title: <input type="text"/>
Telephone: <input type="text"/>	Ext: <input type="text"/> Fax: <input type="text"/>
E-Mail: <input type="text"/>	Confirm E-Mail: <input type="text"/>
Submitter Information	
First Name: <input type="text"/>	Last Name: <input type="text"/>
Approval ID: <input type="text"/>	Submit Date and Time: <input type="text"/>
Only the legally responsible party may submit this report.	
<input type="button" value="Certify and Submit"/>	

#### Next Steps

- The report released on September 17, 2018.
- The report was taken down on September 20, 2018, due to technical errors.
- TEA is working on fixing the SC3001.
- Report expected to reopen on October 31, 2018.
- TEA will extend the due date.
- TEA will announce the due date once the report reopens.
- TEA will send out a bulletin when the report is reopened.

## CGFA Statewide Bulletins



To subscribe, go to [www.tea.texas.gov](http://www.tea.texas.gov) and click on the 'Sign Up for Updates' link.

To look up past bulletins sent from CGFA, go to our Bulletin Archives page at [https://tea.texas.gov/Finance and Grants/Grants/Bulletin Archives/](https://tea.texas.gov/Finance_and_Grants/Grants/Bulletin_Archives/)

## ■ Most Common Audit Findings for Federal Grants

### Areas of Findings

- Single Audit
- Internal Controls
- Payroll Records
- Time & Effort
- Procurement



### Single Audit

- Failed to file Single Audit reports with Federal Audit Clearinghouse (FAC)
  - 40 Districts in Fiscal Year 2016-2017
  - 28 Districts in Fiscal Year 2017-2018

### Internal Controls

- Chart of accounts, detailed general ledger, and payroll journal did not use the correct account codes as permitted in the Financial Accountability System Resource Guide (FASRG)
- Funds obligated outside of the grant period
- Total expenditures claimed for reimbursement exceeded the total expenditures recorded in the financial records

- Class object codes of expenditures claimed for reimbursement differed from the expenses recorded in the general ledger
- Lack of budgetary controls, budgets recorded in the general ledger did not match budgets approved in the grant application
- Encumbrances are not recorded in the general ledger
- Funds reserved under schedule PS3101 of the grant application were not budgeted/identified in the general ledger
- Lack of segregation of duties
- Lack of written policies and procedures to comply with EDGAR
- Expenditures are not supported by adequate source documentation

### **Payroll Records**

- Positions not approved in the application
- Did not maintain signed and dated job descriptions describing the duties/activities allowed under the program
- Did not maintain salary authorizations to support the payroll costs charged to the grant
- Did not maintain supplemental contract or agreement stipulating allowable program (Title I, Part A) work activities performed by the employees for tutoring or extra duty pay
- Did not maintain appropriate certification for teachers/paraprofessionals

### **Time & Effort**

- Employee paid with grant funds did not maintain time and effort documentation
- Semi-Annual certifications signed at the beginning of the certification period
- Policies and procedures did not identify the reporting periods for time and effort
- Periodic certification submitted for employees who worked on multiple cost objectives based on the percentage of employees' time budgeted/paid from the federal funds
- Time and effort documentation did not reflect 100% of activities the employee was compensated from.
- Time allocation did not agree with payroll cost allocation
- Did not maintain time and effort documentation to support stipends paid with federal funds

### **Substitute Time & Effort**

- Did not obtain approval from TEA for Management Certification to maintain substitute time and effort documentation
- Percentages allocated per substitute time and effort certification did not match percentages paid with grant funds

### **Procurement**

- Did not maintain adequate policies and procedures to comply with procurement standards

- Did not identify the method of procurement for its purchases
- Purchases did not adhere to appropriate procurement standards
- Did not obtain adequate number of quotations to support expenditures made with Small Purchase Procedures
- Procurement by Noncompetitive Proposal did not meet the one of the four allowed circumstances
- Lack of executed agreement or contract with the vendor
- Documentation not provided to demonstrate compliance with Suspension and Debarment
- Purchase made through purchasing cooperative without an agreement
- Purchase made through purchasing cooperative did not comply with federal procurement requirements

### Subrecipient Monitoring Links

- [https://tea.texas.gov/Finance\\_and\\_Grants/Grants/Federal\\_Fiscal\\_Monitoring/Monitoring\\_of\\_Single-Audit\\_Findings/](https://tea.texas.gov/Finance_and_Grants/Grants/Federal_Fiscal_Monitoring/Monitoring_of_Single-Audit_Findings/)
- [https://tea.texas.gov/Grants/Federal\\_Fiscal\\_Monitoring/riskassessment/](https://tea.texas.gov/Grants/Federal_Fiscal_Monitoring/riskassessment/)



## ■ Private Nonprofit (PNP) Equitable Services

### Equitable Services Are Required

Local educational agencies (LEAs) are required to provide services for eligible private nonprofit school students.

Equitable services provided by the LEA for private nonprofit school participants are designed to meet their educational needs and supplement the educational services provided by the private school.

### Equitable Services Must Be...

- Secular, neutral, and non-ideological for all educational services, materials, and equipment
- Equitable educational services compared to public school
- Provided in a timely manner
- Monitored and enforced by the Ombudsman

### What constitutes private non-profit status?

Under 34 CFR 77.1, the term “nonprofit” as applied to an agency, organization, or institution, means that it is owned and operated by one or more corporations or associations whose net earnings do not benefit, and cannot lawfully benefit, any private shareholder or entity.

### Eligible Programs for Equitable Services

- Title I, Part A Equitable Services, ESSA Section 1117
- Title VIII Equitable Services, ESSA Section 8501
  - Title I, Part C – Migrant
  - Title II, Part A – Supporting Effective Instruction
  - Title III, Part A – English Learners & Immigrants
  - Title IV, Part A – Student Support & Academic Enrichment
  - Title IV, Part B – 21<sup>st</sup> Century Community Learning Centers

### Consultation

‘Successful consultation begins well before the implementation of services, establishes positive and productive working relationships, makes planning effective, continues throughout implementation, and serves to ensure that the services provided meet the needs of eligible [PNP] students and teachers.’

*\*ED Fiscal Changes & Equitable Services Guidance*  
[Sec. 1117(b) & 8501(c)]

**Obligation of Funds**

LEA funds for educational services and other benefits to eligible PNP children shall be obligated within the same fiscal year in which they are received.

ESSA, Sections 1117(a)(4)(B) & 8501(a)(4)(B)

**Carryover of Unobligated Funds**

Extenuating circumstances only

- If TEA approves, funds may remain available for the provision of equitable services under the program (i.e., Title I, Part C; Title I, Part IV-B) during the subsequent school year
- LEA must consult with PNP officials to determine how funds will be spent in subsequent school year

Non-Regulatory Guidance: ESSA Fiscal Changes and Equitable Services Requirements, N-6 & N-7 (November 2017)



**Department of Contracts, Grants and Financial Administration  
LEA Provision of Private Nonprofit (PNP) Equitable Services  
PNP Excessive Carryover Waiver Request  
School Year 2017-2018**

In general, to ensure that equitable services are provided in a timely manner, an LEA must obligate the funds allocated for equitable services under all applicable programs in the year for which they are appropriated. [ESSA Sections 1117(a)(4)(B) and 8501(a)(4)(B)]. There may be extenuating circumstances, however, in which an LEA is unable to obligate all funds within this timeframe in a responsible manner. Under these extenuating circumstances, the funds may remain available for the provision of equitable services under the respective program(s) during the subsequent school year. In determining how such carryover funds will be used, the LEA must consult with appropriate private school officials. [ESEA sections 1117(b) and 8501(c)].

**Submission Deadline:**

Email this request form to [PNPOmbudsman@tea.texas.gov](mailto:PNPOmbudsman@tea.texas.gov) by **November 15, 2018**. Upon submission of carryover waiver request to TEA, it will be reviewed for approval. Submit one waiver request form per individual private non-profit school. TEA results of the request will be provided to the LEA within 30 days.

**Contact Information**

LEA Name	<input type="text"/>	CDN	<input type="text"/>	ESC	<input type="text"/>
LEA Contact	<input type="text"/>	Phone	<input type="text"/>		
Email	<input type="text"/>	# Served PNP schools in the LEA	<input type="text"/>		
Name of PNP school	<input type="text"/>				

**Part 1: PNP Participating Program(s) and Total LEA Equitable Services Amount of Carryover Waiver Request**

Equitable services program amount per PNP campus must be kept locally and shared with participating PNP schools.

Check participating program(s) requesting equitable services carryover waiver	Total calculated private school reservation (from PS3099)	Amount of requested carryover for equitable services
<input type="checkbox"/> Title I, Part A	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> Title I, Part C	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> Title II, Part A	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> Title III, Part A English Learner	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> Title III, Part A Immigrant	<input type="text"/>	<input type="text"/>
<input type="checkbox"/> Title IV, Part A	<input type="text"/>	<input type="text"/>

**Part 2: Excessive Carryover Waiver Justification**

Check the identified extenuating circumstance(s) in which the LEA is requesting PNP equitable services carryover.

- |   |  |
|---|--|
| <input type="checkbox"/> Closure of LEA or PNP school(s)  | <input type="checkbox"/> New and/or changes in LEA/PNP administration  |
| <input type="checkbox"/> LEA/PNP school safety issue(s)   | <input type="checkbox"/> Budgeted costs lower than anticipated   |
| <input type="checkbox"/> LEA delayed access to program funds (due to statutory or TEA reasons)                | <input type="checkbox"/> PNP complaint/dispute(s) delayed services   |
| <input type="checkbox"/> LEA delay in retaining staff and/or equipment/supplies to provide equitable services | <input type="checkbox"/> Natural disaster (hurricane, fire, flood, severe storm damage, etc.)                                      |
| <input type="checkbox"/> LEA and/or PNP delay in administering or planning equitable services                 | <input type="checkbox"/> Professional development activities and/or other pre-planned equitable services canceled late in the year |

**Part 2: Excessive Carryover Waiver Justification (Cont.)**

Provide specific details on the selected extenuating circumstance(s) selected in Part 2.

**Part 3: PNP Equitable Services Carryover Reduction Plan**

Check the identified LEA's plan to reduce the private nonprofit equitable services carryover amount. You must select at least one option. If you select **Other**, describe the planned activities in the space provided.

- ☐ Summer Program ☐ Other:
- ☐ Parent Involvement Activities
- ☐ Professional Development
- ☐ Before and/or After School Academic Tutoring Services

Provide specific details and dates for equitable services which will be provided to expend the carryover in 2018-2019.

**LEA Certification Statement**

On behalf of the LEA, I certify:

1. Acceptance and compliance with all PNP requirements in ESSA, Sections 1117 and 8501.
2. Submission date and the total LEA equitable services amount requested on the PNP Excessive Carryover Waiver to TEA will be shared with applicable PNPs no later than 7 days following waiver submission.
3. Results from TEA will be shared with applicable PNPs within 14 days of receiving the response.

Signature of LEA Official

**For TEA Use**

- ☐ Request for PNP excessive carryover waiver is approved.
- ☐ Request for PNP excessive carryover waiver is approved as specified below.

- ☐ Request for PNP excessive carryover waiver is not approved.
- ☐ More information is needed. See below.

Signature of Private School  
Equitable Services Director

## PNP and Transferability – New ED Guidance

**May LEAs leave only the PNP equitable share in its original program while transferring out all other LEA funds?**

- No. LEAs must calculate equitable service shares based on the total amount of funds available under a program after a transfer. *An LEA may not transfer funds to a specific program solely to provide equitable services, it may not retain funds solely for this purpose.*
- Funds transferred under this section are subject to each of the rules and requirements applicable to the funds under the provision to which the funds are transferred.

TEA ESSA PNP Equitable School Services and the Transferability Authority, Q8. (April 2018)

## PNP and Title V, Part B - Rural Education Initiative (REAP) – NEW ED Guidance

Small Rural Schools Authority (SRSA)

- Required by statute to engage in timely and meaningful consultation with PNP officials
- Applies only to Title II, Part A and Title IV, Part A program funds
- If using Alternative Fund Use Authority (AFUA), LEA must reserve total equitable services amount generated by PNP school.

Rural Low Income Schools (RLIS)

- LEA must be SRSA eligible
- Required by statute to engage in timely and meaningful consultation with PNP officials
- Equitable services reservation is based on funds remaining *after* transfer.

### May early childhood programs located in a PNP school participate and receive equitable services?

Equitable services may not be used in *stand-alone* PNP early childhood programs for students or staff. However, if a PNP has an early childhood program and any one or more school-age children (i.e., K-12 grade levels) in the same building, students and staff may receive equitable services.

Source: Non-Regulatory Guidance Early Learning in the Every Student Succeeds Act - Expanding Opportunities to Support our Youngest Learners

<https://www2.ed.gov/policy/elsec/leg/essa/essaelguidance10202016.pdf>

## PNP Random Validations Results

### LEA Areas of Strengths

- Documentation of ongoing consultation through the year
- Detailed timelines, expectations, and processes
- Evaluation of program effectiveness
- Review of data and PNP needs

### LEA Areas of Improvement

- Lack of written documentation
- Lack of LEA fiscal and program oversight
- No description of equitable services available for PNP school officials
- Social Security Numbers should not be collected

## PNP Training Sessions

- October 25 – ACET Conference
- Online Registration Available Through ESCs
  - November 8 – ESC 20  
[https://txr20.escworks.net/catalog/session.aspx?session\\_id=55473](https://txr20.escworks.net/catalog/session.aspx?session_id=55473)
  - November 14 – ESC 4  
[https://www.escweb.net/tx\\_esc\\_04/catalog/session.aspx?&session\\_id=1417161](https://www.escweb.net/tx_esc_04/catalog/session.aspx?&session_id=1417161)
  - November 30 – ESC 13  
<https://ecampus.esc13.net/login.html>
  - December 11 – TETN Meeting for Regions 1-3 & 14-19
  - December 13 – ESC 11  
[https://ontrac.esc11.net/session.asp?Wksp\\_Num=013291&sess\\_Num=023215](https://ontrac.esc11.net/session.asp?Wksp_Num=013291&sess_Num=023215)

## Resources



### U.S. Department of Education:

<https://www2.ed.gov/about/offices/list/oii/nonpublic/index.html>

### TEA PNP Webpage:

[https://tea.texas.gov/Finance\\_and\\_Grants/Grants/ESSA\\_Private\\_School\\_Equitable\\_Services](https://tea.texas.gov/Finance_and_Grants/Grants/ESSA_Private_School_Equitable_Services)

### Capacity Building:

<https://www.region10.org/programs/title-i-capacity-building-initiative/compliance/program-compliance/equitable-services-for-private-nonprofit-schools>

## ■ 2018-2019 Title I, Part A Monitoring

### 2018-2019 Title I, Part A Program Validations

1. Supplement Not Supplant Methodology
2. Schoolwide Program (SWP) Elements
3. Parent and Family Engagement (PFE) Policy
4. Documents Translation Procedure

### Title I, Part A Program Validations Process:

- Randomly select 2 LEAs from each region that were not selected for any of the other validations.
- Timeline for each validation will not overlap with the other validations.
- ESCs will be trained to be prepared to provide you assistance.

### Each Validation will include:

#### Timeline

- Guidance
- Validation Checklist
- TEA Title I, Part A Contact
- ESC Title I, Part A Contact

## Title I, Part A Supplement Not Supplant Methodology

**Purpose:** To monitor the Title I, Part A LEA's Supplement Not Supplant Methodology

**Timeline:** November 5, 2018–February 1, 2019

**Submission Requirement:** Submit either the LEA's methodology or Statement of Exemption

## 2017-2018 Title I, Part A SWP Elements Validation Results

Validated SWP Elements 1-3

Elements most frequently not met:

- Including parents in the development of the CIP
- Location of CIP
- Including parents in the development of the written PFE policy

## 2018-2019 Title I, Part A SWP Elements Validation

**Purpose:** To monitor the implementation of the Title I, Part A SWP requirements

**Timeline:** November 26, 2018–March 15, 2019

**Submission Requirement:**

- CNA Summary
- Navigation document
- CIP pages that address the Elements 1-3
- List of the individuals and their roles who assisted with the development of the CIP and the PFE written policy



## 2018-2019 Title I, Part A Parent and Family Engagement Policy Validation

**Purpose:** To monitor the required Title I, Part A SWP PFE written policy

**Timeline:** April 1–May 17, 2018

**Submission Requirement:** PFE written policy

## 2018-2019 Title I, Part A SWP Documents Translation Procedure

**Purpose:** To monitor the translation requirements of the Title I, Part A SWP documents

**Timeline:** April 15–May 24, 2018

**Submission Requirement:** Campus translation procedure

## ■ Supplement, Not Supplant (SNS)

Revised SNS Handbook

<https://tea.texas.gov/WorkArea/DownloadAsset.aspx?id=25769805407>

- Traditional SNS requirement (Section A)
- Title I SNS requirement (Section B)



### Traditional SNS Requirement

- Most federal programs with SNS provision still use traditional documentation.
- Program activities must be used to enhance, expand, or extend required activities.

### Presumptions of Supplanting:

- Provide services required by State or local law;
- Provide same services as those provided in prior school year with State or local funds;
- Provide same services in Federal and non-Federal programs.

## Title I SNS Requirement

- Most flexible and easily documented
- Applies to—
  - Title I, Part A
  - Title I School Improvement funds
  - Title I, Part C

### All LEAs that receive Title I funds must have one:

- Methodology for distributing State and local funds to all its campuses;

**OR**

- Statement of Exemption

### Exemptions from Methodology requirement

- Single campus (only one school in district)
- Single campus per grade span (no grade duplication)

Statement of Exemption – Example in Handbook (Section F)

### Statement of Exemption must include:

- Statement of statute
- Reference to type of exemption from TEA guidance
- Statement of exemption

### Methodology for State and Local Funds

- Districtwide basis or by grade span (EL, MS, HS)
- May exclude “Title I-like” supplemental State or local funds
- May exclude funds reserved at the district level that are not distributed to campuses
- 3 components

## Methodology Components

1. Statement of the methodology—In description of methodology, LEA must:
  - a. State whether distribution is districtwide or by grade span
  - b. State type of methodology used (per-pupil, weighted per-pupil, or personnel/non-personnel costs)
  - c. Include restatement of the statute/purpose of SNS
2. Criteria used—In description of methodology, LEA must include:
  - a. Per-pupil amount(s) for district or grade spans
  - b. Weights assigned (if any)
  - c. Classes of personnel/non-personnel costs (if applicable)
  - d. Other (specify)
3. Mathematical calculation formula – SHOW YOUR WORK!!!

## Methodology Examples in Handbook (Section E)

- Simple per-pupil amount districtwide
- Per-pupil by grade span
- Weighted student formula
- Personnel/non-personnel costs

Caveat: No specific guidance has been issued concerning SNS for district-level funds.

In absence of such guidance, TEA recommends applying traditional SNS documentation to rebut presumptions of supplant for district-level Title I funds.

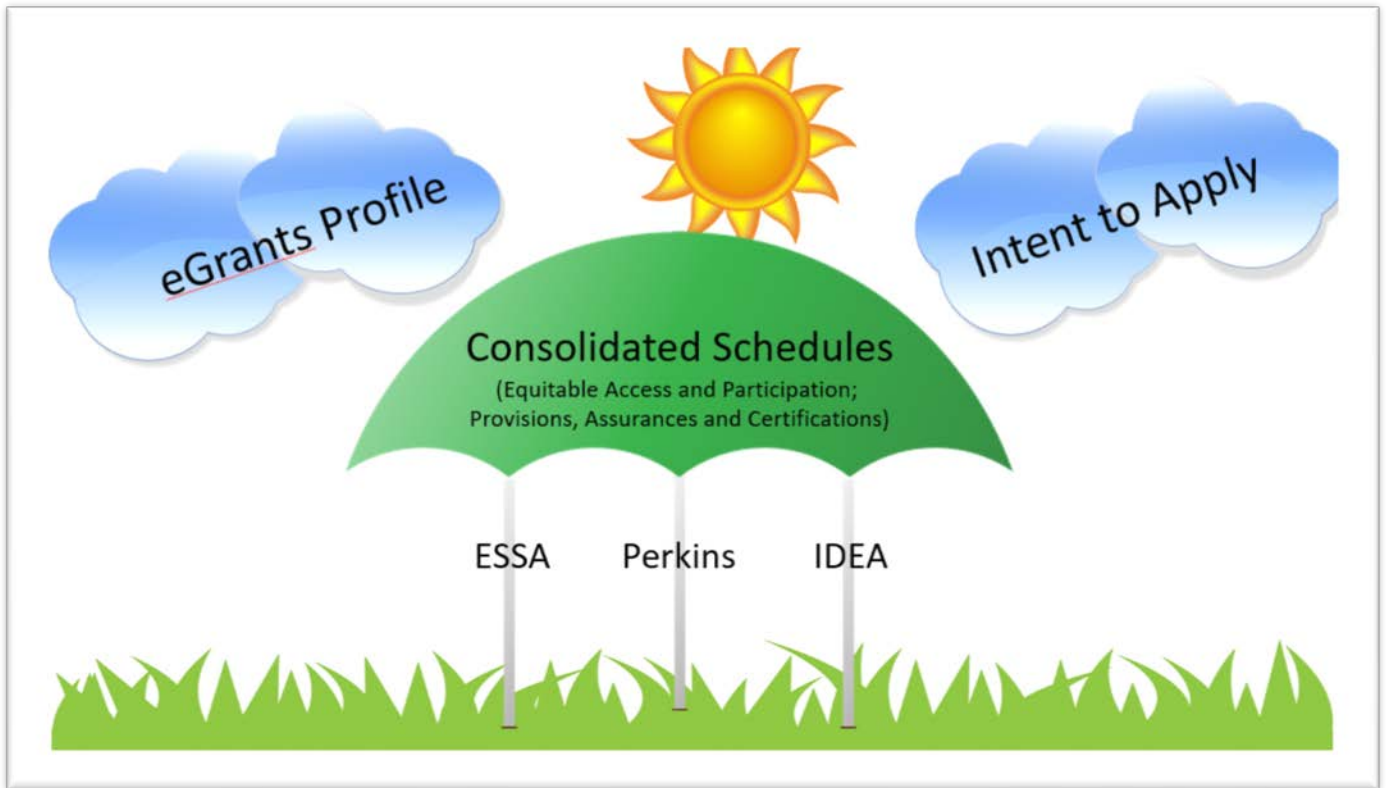
## Monitoring (Section C)

Monitoring Review by staff from Federal Fiscal Monitoring Division

Random Validations

- 2 LEAs per ESC region
- LEAs notified in November 2018
- Results to LEAs in December 2018
- Technical assistance from ESCs to correct
- Close-out by February 1, 2019

## ■ 2019-2020 ESSA/IDEA/Perkins Consolidated Application



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