2018 Statewide Federal Grants Training

Department of Contracts, Grants and Financial Administration

Texas Education Agency

October 4, 2018
Austin ISD Performing Arts Center
Austin, Texas

October 8, 2018
ESC Region 17
Lubbock, Texas

October 12, 2018
ESC 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

Agenda (continued)

- 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

Cory Green

Associate Commissioner

Contracts, Grants and Financial Administration

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

Hurricane Grants Update

- 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

6

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

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

9

Competitive Grants

▸ 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

10

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

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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

13

Monitoring

▸ FY2019 (current year)

▸ TEA will require repayment for questioned costs
- ◦ Policies
- ◦ Procedures

14

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

LEA Input Question

Did you like the 27-month NOGA process?
- ▸ Yes
- ▸ No

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

▸ *THANK YOU to the 450 LEAs that have already submitted*

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Two Data Submission Systems

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

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Email Addresses

- ▸ ESSAsupport@tea.texas.gov

- ▸ GrantSupport@tea.texas.gov

- ▸ 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.

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LEA Contract Guidance Coming

▸ Guidance document in progress

▸ Estimated release Spring 2019

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Debriefing on USDE Performance Review of ESSA

Cory Green

Associate Commissioner

Contracts, Grants and Financial Administration

USDE Performance Review

- 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

Christina Villarreal

Department Chief of Staff

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Education Department General Administrative Regulations

▸ EDGAR ⟶ Uniform Guidance

▸ OMB revised rules and cost principles for all nonfederal entities

▸ Effective December 26, 2014

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

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Key Sections of EDGAR

▸ 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

31

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

Small Purchase

Sealed Bids or Competitive Proposals

Noncompetitive Proposals

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

36

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)

37

Small Purchase

Simple and informal method for purchases above $10,000 but less than $250,000

CAUTION

State Rules Apply
For purchases of $50,000 or more, competitive procurement is required

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

39

Noncompetitive Proposals

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

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Suspension and Debarment

Verification must be done by either:

▸ Checking SAM.gov; or
▸ Collecting a certification from the vendor

EDGAR Micro-Purchases and Increased Thresholds

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

OFFICE OF FEDERAL
FINANCIAL MANAGEMENT

June 20, 2018

M-18-18

MEMORANDUM FOR CHIEF FINANCIAL OFFICERS AND HEADS OF SMALL EXECUTIVE
AGENCIES

FROM: Tim Soltis

Deputy Controller, Office of Federal Financial Management

SUBJECT: Implementing Statutory Changes to the Micro-Purchase and the Simplified
Acquisition Thresholds for Financial Assistance

TEA Guidance

TEA

Texas Education Agency

Commissioner Mike Morath

1701 North Congress Avenue • Austin, Texas 78701-1494 • 512 463-9734 • 512 463-9838 FAX • tea.texas.gov

August 28, 2018

TO THE ADMINISTRATOR ADDRESSED:

SUBJECT: Implementing Statutory Changes to Micro-Purchase and the Simplified
             Acquisition Thresholds under the Education Department General Administrative
             Regulations (EDGAR)

Recent federal statutory changes have resulted in increases to the thresholds for micro-
purchases and small purchases under the procurement rules in EDGAR. The increased

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EDGAR Resources

www.tea.texas.gov

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DEPARTMENT OF
CONTRACTS, GRANTS & FINANCIAL ADMINISTRATION

SC3001 – Needs Assessment, Priorities and Outcomes

Didi Garcia

Director of Programs and Data Management

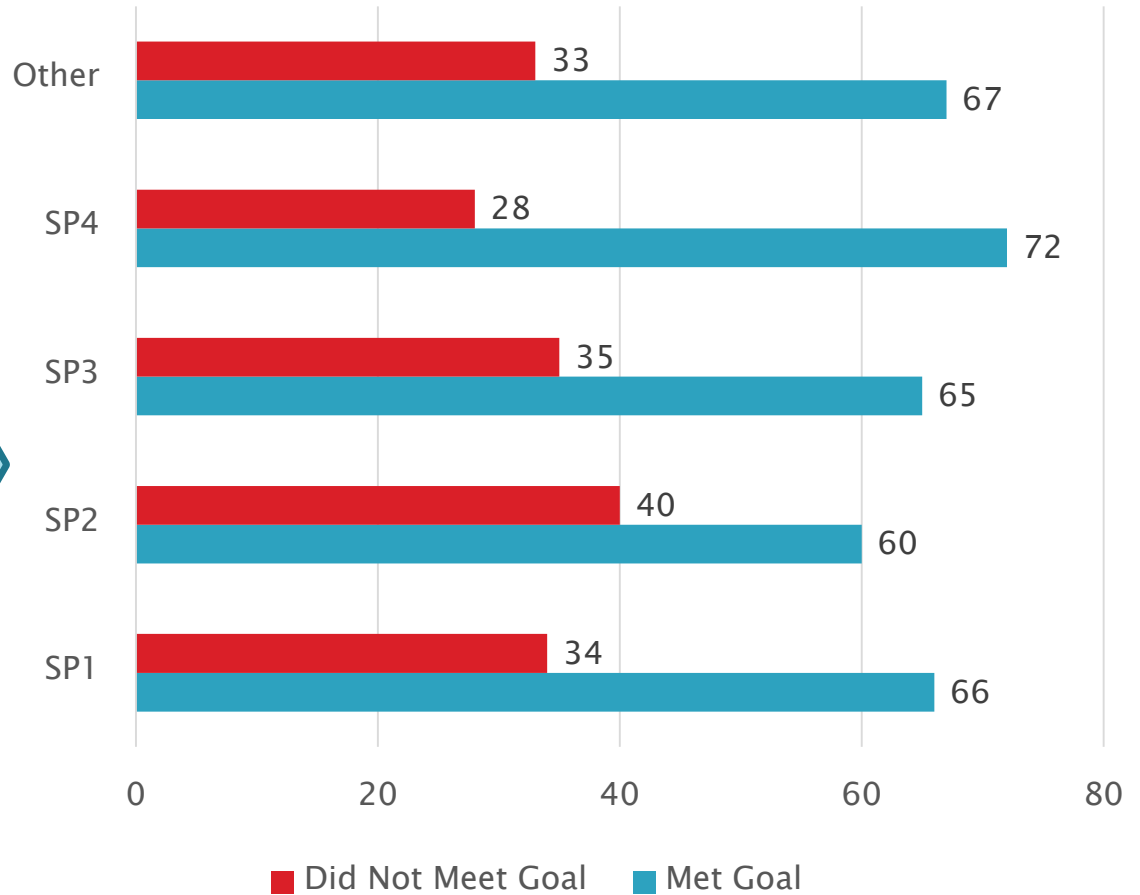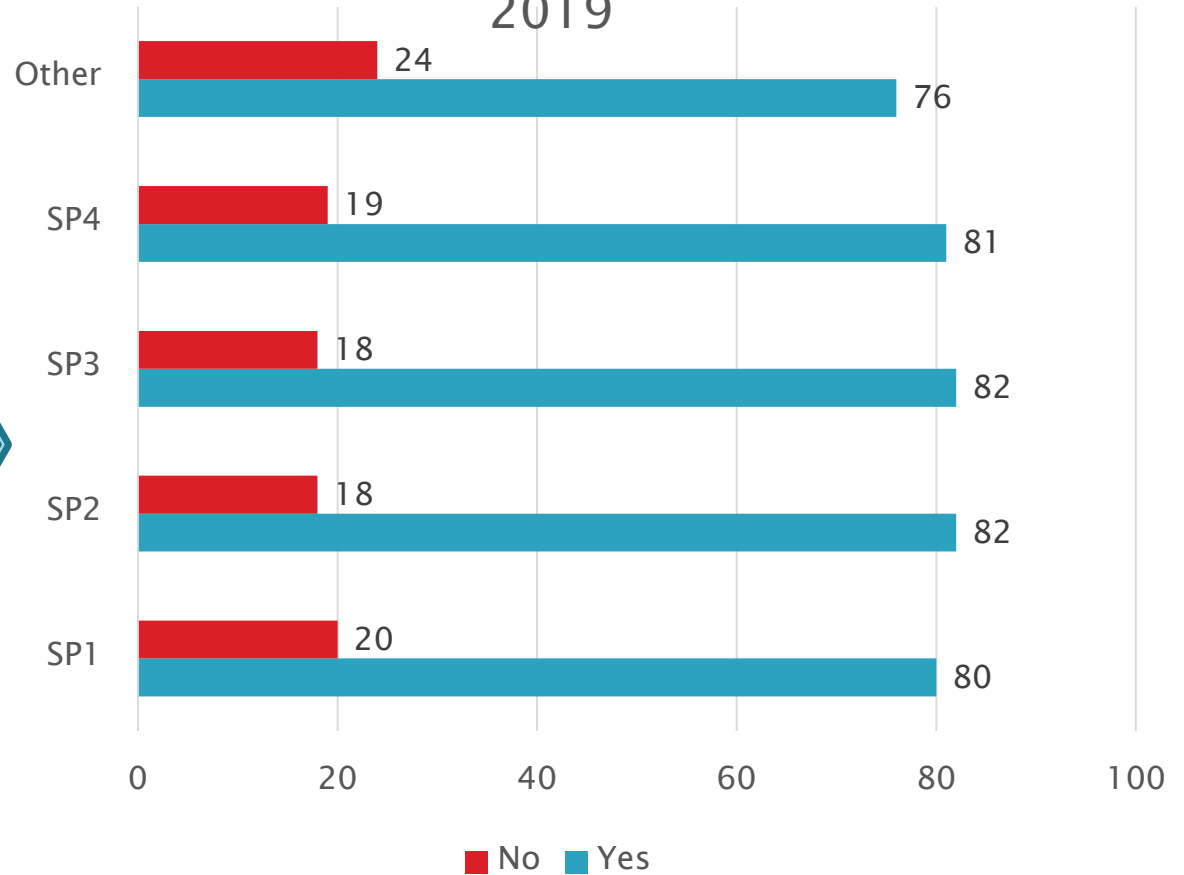Every child, prepared for success in college, a career or the military.

Strategic priorities

Recruit, support, and retain teachers and principals

Build a foundation of reading and math

Connect high school to career and college

Improve low-performing schools

Enablers

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)

46

PR3001 Results 2017-2018

% Meeting One-Year SMART Goal

Meeting One-Year SMART Goals

Category	Did Not Meet Goal	Met Goal
Other	33	67
SP4	28	72
SP3	35	65
SP2	40	60
SP1	34	66

■ Did Not Meet Goal   ■ Met Goal

48

% LEA Continue SMART Goal in 2018–2019

LEA Continue SMART Goal

|	No	Yes
Other	24	76
SP4	19	81
SP3	18	82
SP2	18	82
SP1	20	80

49

% LEA Spending 90% of Funds Budgeted on Activities for Strategic Priority
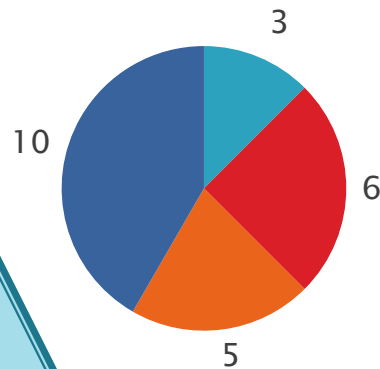
90% of Funds Budgeted on Activities for Strategic Priority

SP4: No 7, Yes 93
SP3: No 13, Yes 87
SP2: No 1, Yes 99
SP1: No 7, Yes 93

No   Yes

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LEAs Implementing Recommended Use of ESSA Funds
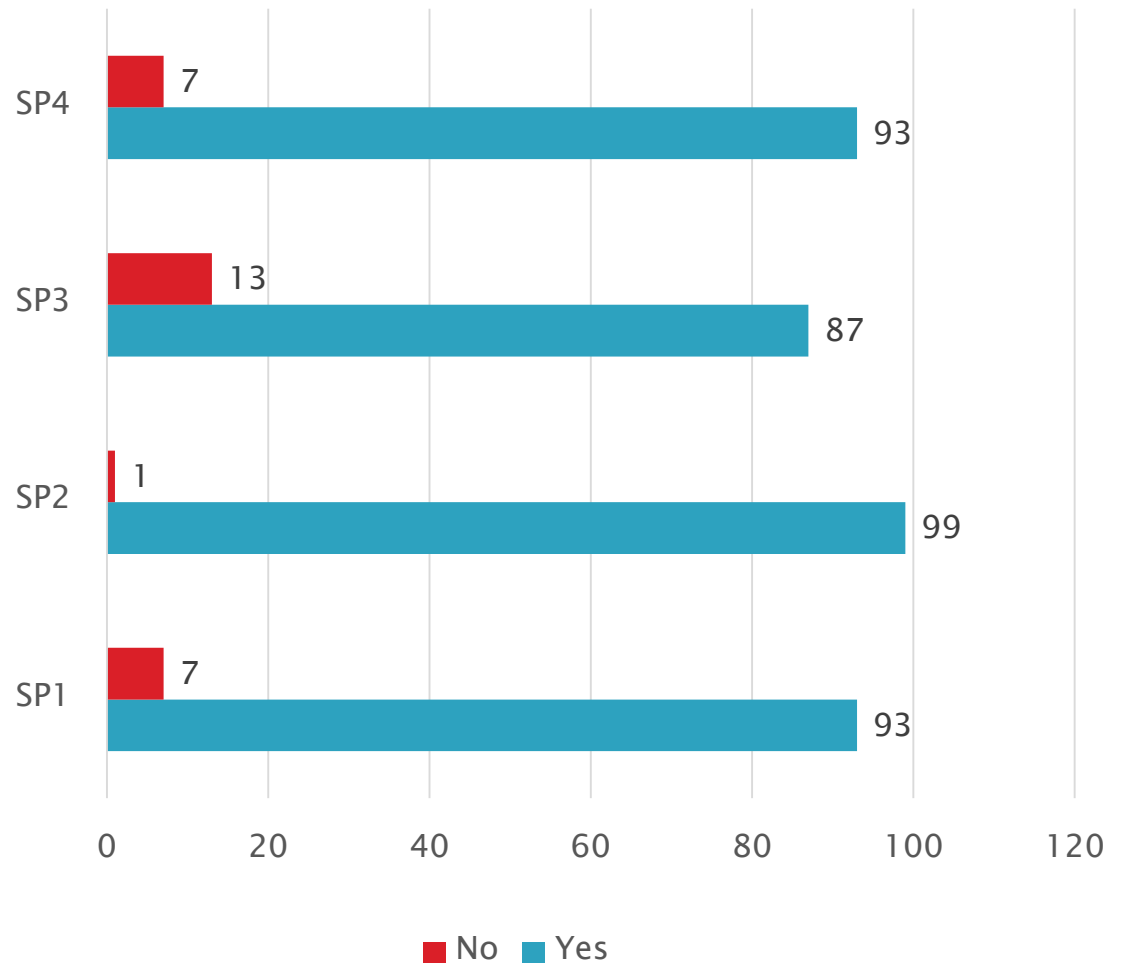
% of LEAs Implementing Recommended Use Of ESSA Funds for Strategic Priority
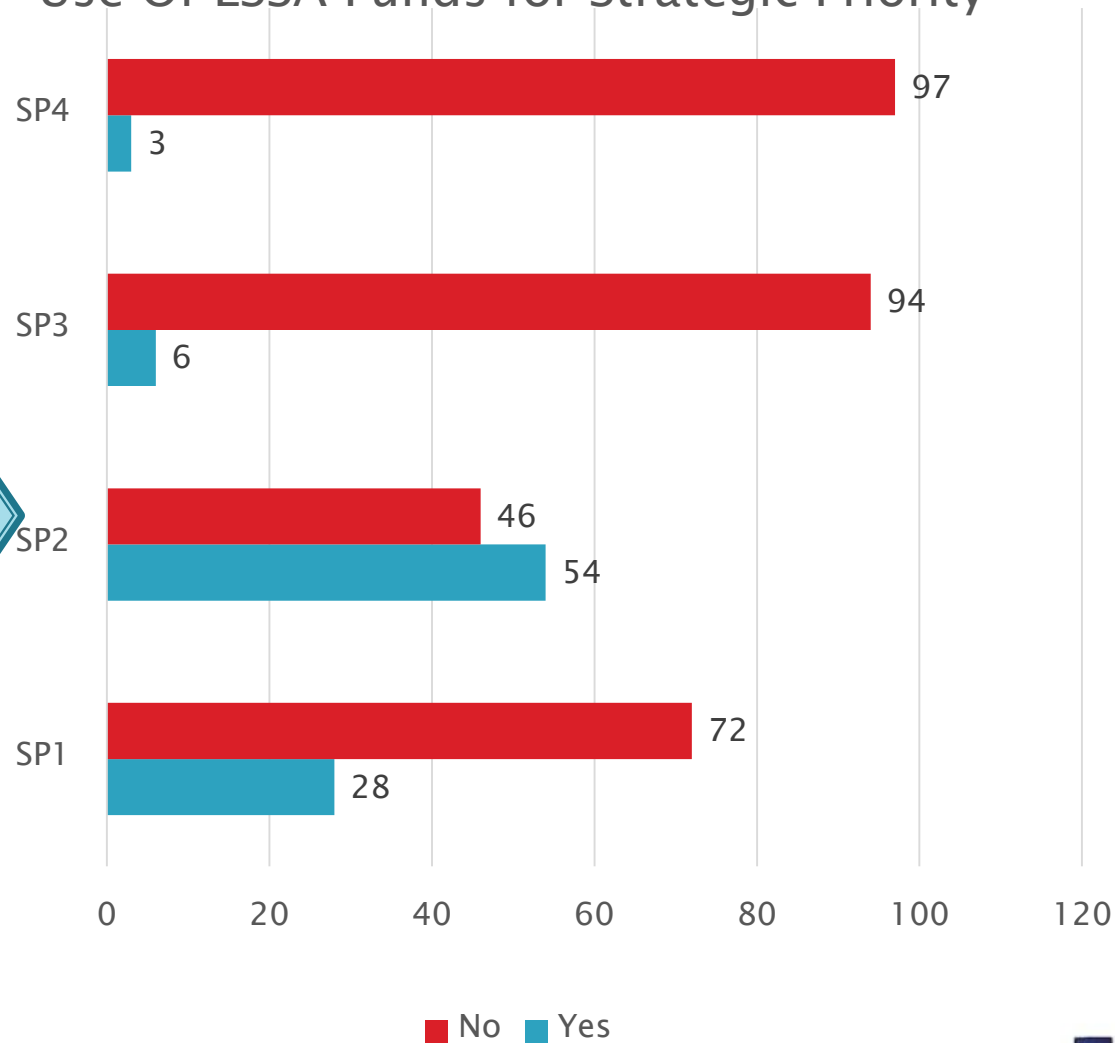
Strategic Priority	No	Yes
SP4	97	3
SP3	94	6
SP2	46	54
SP1	72	28

Legend: No (red), Yes (blue)

51

Strategic Priority 1
Recruit, Support, and Retain Teachers and Principals

Title I, Part A
3
10
6
5

Title I, Part C
0.1

Title II, Part A
5
10
10
8

Title III, Part A
0.3
1

Title IV, Part A
2
2
0.4

Strategic Priority 2
Build a Foundation of Reading and Math

Title I, Part A
8 9 1
7
5
18 40

Title I, Part C
0.1 0.1
0.4 0.4
0.5

Title II, Part A
0.1 2 2 2
11 9

Title III, Part A
0.5 0.8
0.1
0.7

Title IV, Part A
0.7 2
2
7 2

53

Strategic Priority 3
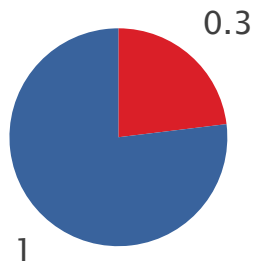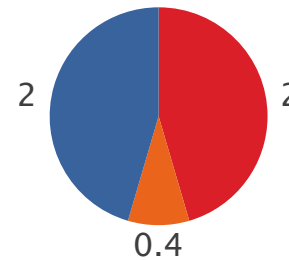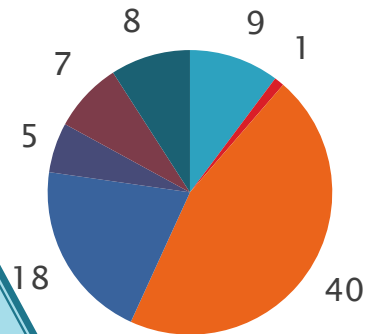Connect High School to Career and College

Title I, Part A
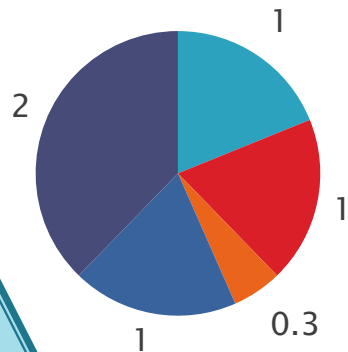
Title I, Part C
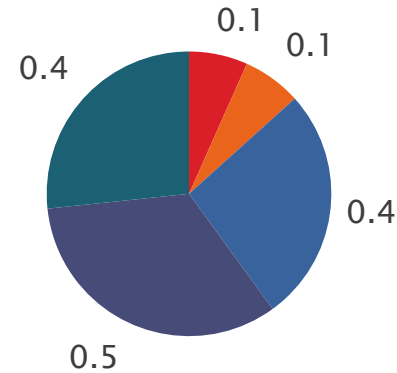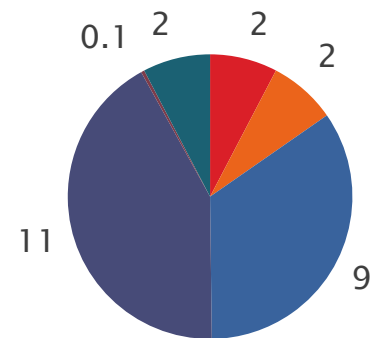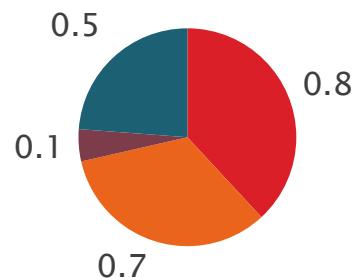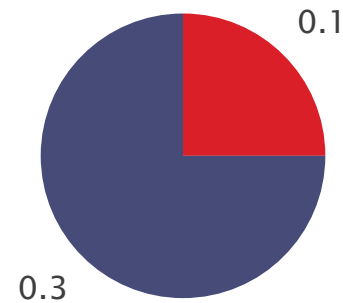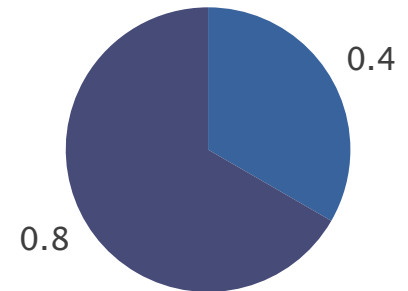
Title II, Part A

Title III, Part A
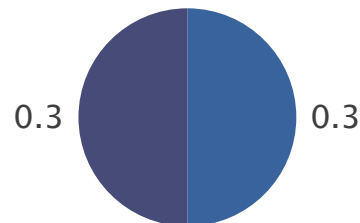
Title IV, Part A
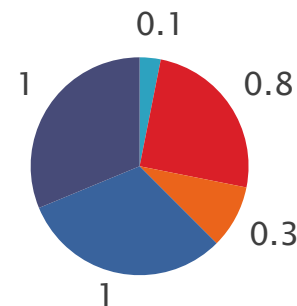
Strategic Priority 4
Improve Low Performing Schools

Title I, Part A

0.7   0.3
0.1   0.8
2
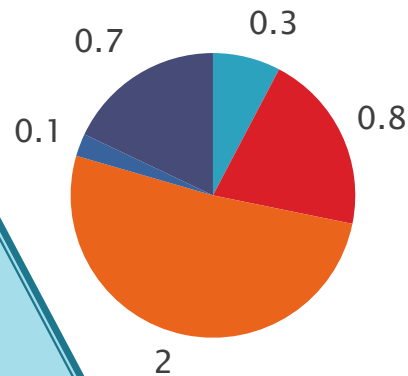
Title I, Part C

0

Title II, Part A

0.3
0.6
0.7

Title III, Part A

0.1   0.1
0.1

Title IV, Part A

0.1   0.1
0.6

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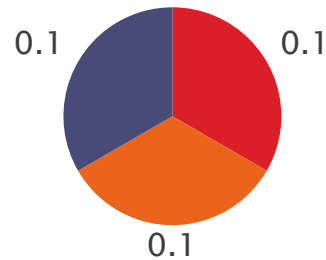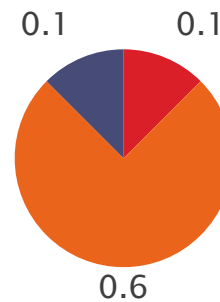
SMART Goals for Federal Grant Funds Resources
2018-2019

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

https://tea.texas.gov/Finance_and_Grants/Grants/Student_Achievement _SMART_Goals_for_Federal_Grant_Funds/

Title I, Part C of the Carl D. Perkins Act (2006) and Every Student Succeeds Act (ESSA) (2015) Federal Grant Programs

Recommended Initiatives and Best Practices	STATE & LOCAL	PERKINS*	ESSA									
			Title I*				Title II		Title III	Title IV	
			A*††	1003(a)* †	C*	D*	A*	B*†	A*	A*	B*†
Recommended Uses of Funds											
Instructional leadership development focused on the observation/feedback cycle	X	X	X	X	X	X	X	X	X	X	
Principal support and supervision	X	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	X			X	X			
Other Best Practices											
Teacher mentoring and coaching	X	X	X	X		X	X	X	X	X	
Induction programs for new teachers	X	X	X	X		X	X	X		X	
Systemic Human Resources Office improvements, including targeted recruiting and effective screening of teacher and principal employment applicants	X	X	X	X			X	X			
Instructional coaching for teachers and principals, to include teacher mentoring, for serving students with disabilities.	X	X	X	X		X	X	X	X	X	
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 school-level activities must be aligned and should be appropriately scaled to meet LEA or campus needs.											
Perkins funds must be used in accordance with the requirements of the Carl D. Perkins Act of 2006. Funding must go to benefit students in CTE. In areas where Perkins funds are allowed to be used, please ensure that the individuals who benefit from the activity are directly serving CTE students.											
** ALL staff =certified teachers; tutors during school day, before and after school, evenings, and weekends; specialized instruction support staff; principals; other school leaders.											
† Not included in 2018-2019 ESSA Federal Consolidated Application.				†† Title I, Part A refers to schoolwide programs.							

SC3001 Special Collection 2018-2019

2018-2019 – Special Collection

▸ 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.

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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. • List identified need(s) and select the associated TEA Strategic Priority(ies) – Maximum of 10 • Select "Not Aligned" to indicate a locally identified need. This will disable the Strategic Priorities.		☐	☐	☐	☐	☐
	Add Line **Remove Line**					

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Part 2: Programs, Activities, and Funds Budgeted

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

☐ ESSA	LEA applied as a member of an SSA for ALL ESSA funding sources	○Y ○N
☐ Rural and Low Income		
☐ School Improvement		
☐ Perkins	LEA applied as a member of an SSA for Perkins	○Y ○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 3rd 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 ▼	• Select program from dropdown • Enter one year SMART goal – Maximum of 5 • Enter baseline data • Enter 3-5 year goal • Enter data source			

Add Line   **Remove Line**

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Dropdown Validation Requirements

	Required Program Measure and Goal (2A)	"LEA applied for funds…" checkbox selections			
		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 – Maximum of 10 • Indicate if program or activity is new • Indicate TEA Strategic Priority associated with program or activity. • The TEA Strategic Priority must have been addressed in Part 1 Identified Needs	◯Y ◯N	☐	☐	☐	☐	☐
	Add Line Remove Line					

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.

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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: _____ Initial: ____ Last Name: _____ Title: _____

Telephone: _____ Ext: ____ Fax: _____

E-Mail: _____ Confirm E-Mail: _____

Submitter Information

First Name: Last Name:

Approval ID: Submit Date and Time:

Only the legally responsible party may submit this report. [Certify and Submit]

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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

https://tea.texas.gov/Finance_and_Grants/Grants/

Bulletin Archives

Department of Contracts, Grants, and Financial Administration publishes GovDelivery bulletins to subscribers.

You may sign up and subscribe to receive these bulletins at the TEA Email Updates page. You may access previously published bulletins at the link below:

Bulletin Archives

Go to https://public.govdelivery.com/accounts/TXTEA/subscriber/new to subscribe.

Most Common Audit Findings
for Federal Grants

Roger Hingorani

Senior Director

Federal Fiscal Monitoring Division

DEPARTMENT OF
CONTRACTS, GRANTS & FINANCIAL ADMINISTRATION

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

Internal Controls

▶ 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

Internal Controls

▶ 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 PS3101of the grant application were not budgeted/identified in the general ledger

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Internal Controls

▸ 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

Payroll Records

- 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

Time & 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 & Effort

- ▸ Time allocation did not agree with payroll cost allocation

- ▸ Did not maintain time and effort documentation to support stipends paid with federal funds

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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

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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

Procurement

▸ 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

Procurement

▸ Lack of executed agreement or contract with the vendor

▸ Documentation not provided to demonstrate compliance with Suspension and Debarment

Procurement

- ▶ 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/Grants/Federal_Fiscal_Monitoring/riskassessment/

Private Nonprofit (PNP) Equitable Services

LaNetra Guess

Director of Private School 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, Sec. 1117

Title VIII Equitable Services, Sec. 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 – 21st Century Community Learning Centers

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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 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		CDN		ESC	

LEA Contact		Phone	

Email		# Served PNP schools in the LEA	

Name of PNP school	

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
☐ Title I, Part A		
☐ Title I, Part C		
☐ Title II, Part A		

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Part 2: Excessive Carryover Waiver Justification

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

☐ Closure of LEA or PNP school(s)

☐ LEA/PNP school safety issue(s)

☐ LEA delayed access to program funds (due to statutory or TEA reasons)

☐ LEA delay in retaining staff and/or equipment/supplies to provide equitable services

☐ LEA and/or PNP delay in administering or planning equitable services

☐ New and/or changes in LEA/PNP administration

☐ Budgeted costs lower than anticipated

☐ PNP complaint/dispute(s) delayed services

☐ Natural disaster (hurricane, fire, flood, severe storm damage, etc.)

☐ Professional development activities and/or other pre-planned equitable services canceled late in the year

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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

☐ Parent Involvement Activities

☐ Professional Development

☐ Before and/or After School Academic Tutoring Services

☐ Other:

[ ]

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

[ ]

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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)

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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.

PNP and Title V, Part B - Rural Education Initiative (REAP) – *New ED Guidance (cont.)*

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 grade levels (i.e., K-12) in the same building, students and staff *may* receive equitable services.

Non-Regulatory Guidance, Early Learning in the ESSA, *Expanding Opportunities to Support our Youngest Learners* (2016)

PNP Random Validations Results

LEA Areas of Strength

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

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PNP Random Validations Results

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 collected

PNP Training Sessions

October 25 – ACET Conference

Online Registration Available Through ESCs
- November 8 –   ESC 20
- November 14 – ESC 4
- November 30 – ESC 13
- December 11 – TETN Meeting (Regions 1-3 & 14-19)
- December 13 – ESC 11

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

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

Anita Villarreal

State Director

Title I, Part A

DEPARTMENT OF
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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

2018-2019 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.

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2018-2019 Title I, Part A Program Validations Process

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 12, 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

2018-2019 Title I, Part A SWP Elements Validation

Submission Requirement:

- **new** CNA Summary
- **new** Navigation document
- **new** 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, 2019

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, 2019

Submission Requirement:

▸ Campus translation procedure.

Supplement, Not Supplant (SNS)

Vivian Smyrl

Title I, Part A Team Lead

Supplement, Not Supplant

▸ Revised SNS Handbook

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

Supplement, Not Supplant

▸ Revised SNS Handbook

  ◦ 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.

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Traditional SNS Requirement

▸ 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

Title I SNS Requirement

▸ 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

Title I SNS Requirement

▸ Exemptions from Methodology requirement

  ◦ Single campus (only one school in district)

  ◦ Single campus per grade span (no grade duplication)

Title I SNS Requirement

▸ Statement of Exemption

Example in Handbook (Section F)

Title I SNS Requirement

▸ Statement of Exemption

Must include:

◦ Statement of statute

◦ Reference to type of exemption from TEA guidance

◦ Statement of exemption

Title I SNS Requirement

▸ 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

Title I SNS Requirement

- 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

Title I SNS Requirement

▸ Methodology Components

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)

Title I SNS Requirement

▸ Methodology Components

  3. Mathematical calculation formula

    SHOW YOUR WORK!!!

Title I SNS Requirement

▸ Methodology Examples in Handbook (Section E)

- Simple per-pupil amount districtwide

- Per-pupil by grade span

- Weighted student formula

- Personnel/non-personnel costs

Title I SNS Requirement

▸ 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.

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Title I SNS Requirement

- Monitoring (Section C)
  - Monitoring Review by staff from Division of Federal Fiscal Monitoring
  - Random Validations

2019-2020 ESSA/IDEA/Perkins Consolidated Application

Cory Green

Associate Commissioner

DEPARTMENT OF
CONTRACTS, GRANTS & FINANCIAL ADMINISTRATION

Consolidated Application Concept
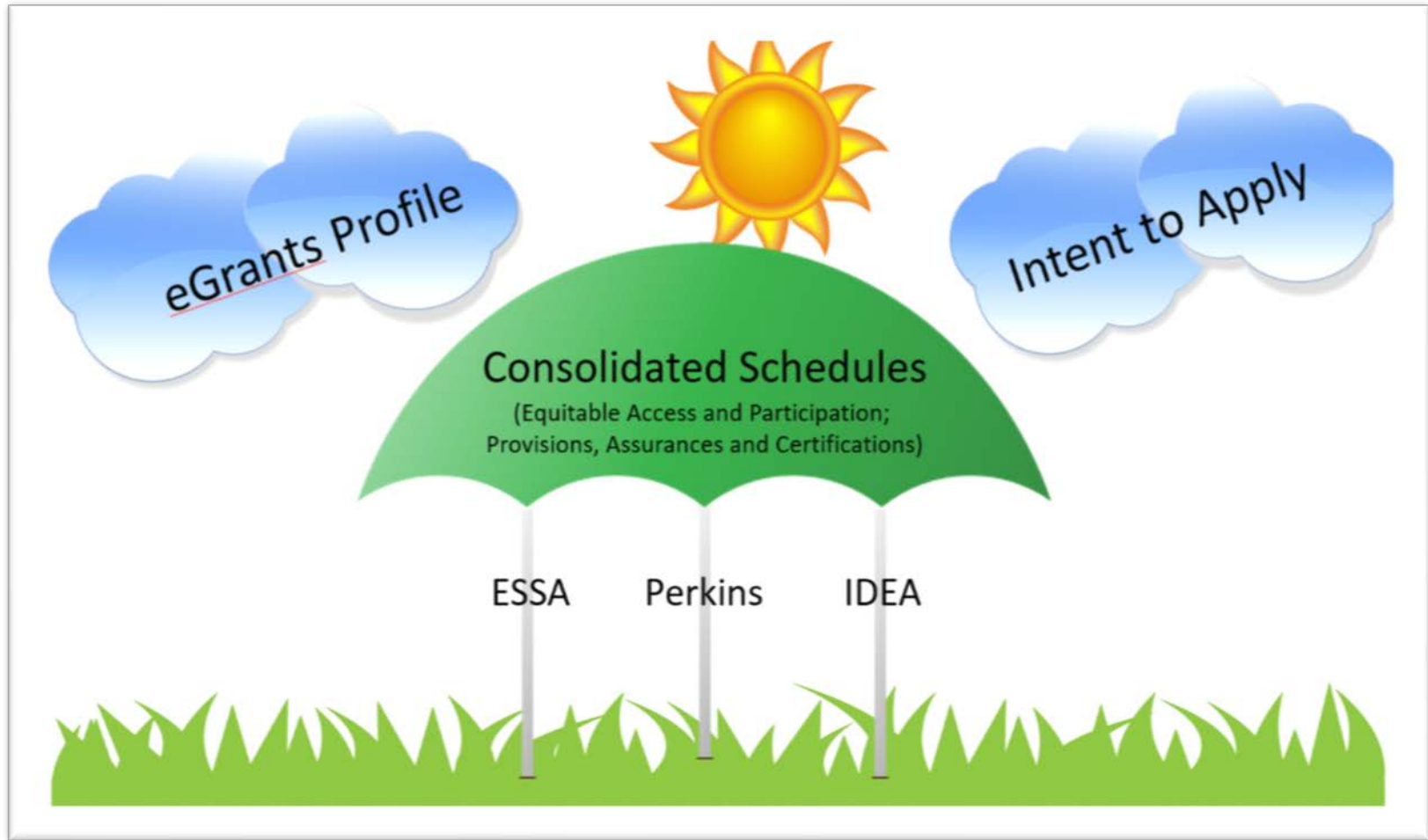
Questions?

Contact Information

Department of Contracts, Grants and Financial Administration

Texas Education Agency

GrantSupport@tea.texas.gov

(512) 463-8992

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