

District Coordinator Handbook for Title IV, Part A Student Support and Academic Enrichment

Office of Continuous Improvement and Support
Division of Student Success



DISCLAIMER

This handbook is provided as a resource for Kentucky Local Education Agencies (LEAs) administering the Title IV, Part A Student Success and Academic Enrichment grant. It is intended to provide coordinators with uniform practices to govern planning for, monitoring, implementing, and evaluating effectiveness of needs-based, supplementary activities, and initiatives of this Federal program.

This handbook is not intended to replace the legislation, regulations and U.S. Department of Education (USED) Non-Regulatory Guidance. Therefore, it is highly recommended that coordinators consult the appropriate resources available online for complete guidance and regulations. In addition, all LEAs and coordinators responsible for implementing this federal program must abide by current laws, regulations, and administrative procedures, USED guidance, and the Education Department General Administrative Regulations (EDGAR). This handbook is considered a working draft and is reviewed and updated as policies and procedures change and, at a minimum, is reviewed yearly. For more information, contact a Kentucky Department of Education (KDE) Title IV, Part A Education Program Consultant.

Ultimately, KDE expects LEAs to make the best decisions for their students, their staff and their community while taking into consideration related federal, state, and local requirements and local capacity (LEA human and fiscal resources).

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Purpose and Overview of Title IV, Part A

General Information

Title IV, Part A is a USED grant program that provides supplemental funding intended to improve students' academic achievement by increasing the capacity of states, LEAs, schools, and local communities to: 1. Provide all students with access to a well-rounded education; 2. Improve school conditions for student learning; and 3. Improve the use of technology in order to increase the academic achievement and digital literacy of all students (ESEA section 4101). The USED awards Title IV, Part A funds to state educational agencies (SEAs), which then subgrant funds to districts.

For all statutory requirements, additional resources and information regarding Title IV, Part A and federal guidance can be found on the KDE Title IV, Part A webpage. The LEA district coordinator should be familiar with the following guidance:

[Title IV, Part A Statute](#)

[Title IV, Part A Non-Regulatory Guidance](#)

[Education Department General Administrative Regulations \(EDGAR\)](#)

LEA Eligibility and Calculations of Allocations

The KDE calculates Title IV, Part A allocations based on the Title I, Part A formula. To receive a Title IV, Part A allocation for a given fiscal year, LEAs must have accepted, received and utilized the awarded Title I, Part A allocations the previous fiscal year (ESEA section 4105(a)(1)).

Declaration of Participation

The Declaration of Participation Report must be completed by your district in accordance with the Every Student Succeeds Act (ESSA). This report is used to identify the number of students enrolled in area private non-public and home schools. The district is required to list all private non-public schools and all home schools that are physically located in your school district's geographic boundaries, not just those participating. Include memberships of all private schools and all home schools, regardless of whether they will participate or are eligible to participate in Title IV, Part A. A grand total of the participants in each program are also required. Do not include private schools or home schools located outside your district's boundaries that are required to be contacted for Title I services. Public school membership information is already on file at KDE (per School Data Forms) and should not be included. The Declaration of Participation is completed in the spring and due around March 26 each year.

Proposed Timeline of Activities

This timeline serves as an example of when activities should occur throughout the year to ensure the effective management of the Title IV, Part A program. Some items within the timeline may be adjusted or revised to fit your district's needs.

| Suggested timeframe | Corresponding activity |
|---------------------|--|
| January – February | <ul style="list-style-type: none"> • Begin to develop a comprehensive needs assessment based on review of relevant district data, consultation with shareholders and review of other data sources. Use it to identify needs in providing well-rounded education opportunities for students, ensuring safe and healthy learning environments for students and effective use of technology. • Evaluate Goals and Objectives for the activities funded with Title IV, Part A. • Time and Effort semi-annual certifications for anyone being paid with Title IV, Part A funds. • Contact private school officials to determine intent to participate and set up consultation calendar for upcoming school year. • Consult with participating private school officials on the program implementation and effectiveness of the current services provided. • KDE on-site consolidated monitoring begins. |
| March – April | <ul style="list-style-type: none"> • Intent to Participate opens in GMAP for districts to complete. • Send participation letters to all non-public schools, including home schools, within the district boundaries. • Conduct consultation with participating non-public school staff regarding their needs and the Title IV, Part A allocation. • Complete an Activity Evaluation to determine if the activity is on target to reach goals/objectives or if any modifications need to be conducted. • Consult with stakeholders and gather their input/feedback on the program and activities being supported with Title IV, Part A funds and in developing the application for the upcoming year. • KDE on-site consolidated monitoring continues. |
| May - June | <ul style="list-style-type: none"> • Complete and submit the Title IV, Part A application and budget within GMAP for KDE review. • Consult with the private schools on implementation and effectiveness of services provided during current school year. • KDE on-site consolidated monitoring is completed. |
| July | <ul style="list-style-type: none"> • Districts with approved consolidated applications may begin spending new fiscal year funds on July 1 with the completion and submission of the District Funding Assurances and Federal Cash Request Assurances (due Sept. 30). Funds allocated for the new fiscal year may not be spent for activities that occur prior to July 1, even if the district’s application is approved. This spending requirement cannot be waived. • Set goal and objectives for activities funded by Title IV, Part A. • Time and Effort semi-annual certification completed by anyone being paid with Title IV, Part A funds. |
| August/September | <ul style="list-style-type: none"> • Establish service start date for participating private/non-public schools (same as public school start date) and begin services with current fiscal year funds. • District Funding Assurances must be completed in GMAP (due Sept. 30). • District Funding Assurances statement must be uploaded in GMAP by the superintendent (not designee) (due Sept. 30). • Federal Cash Request Assurances must be uploaded in GMAP (due Sept. 30). |

| Suggested timeframe | Corresponding activity |
|---------------------|---|
| | <ul style="list-style-type: none"> Funds expire on Sept. 30 each year for the 27-month grant. Ensure funds are encumbered by this date on previous grant award. |
| October | <ul style="list-style-type: none"> Districts selected for desk monitoring will be notified. |
| November – December | <ul style="list-style-type: none"> KDE desk monitoring begins. Consolidated State Performance Report (CSPR) and State Reporting – districts complete survey to provide data on amount of funds spent during previous school year and the degree in which programs are meeting their identified goals and objectives in each grant section. Complete an Activity Evaluation to determine if the goals and objectives are being met or if modifications are needed. Consult with stakeholders and provide updates as well as gather their input and feedback. |

Program Planning and Development

Stakeholder Consultation

During the design and development of its application, LEAs must engage in consultation with stakeholders in the area served by the LEA (ESEA section 4106(c)(1)). The stakeholders that are required as part of the consultation must include, but are not limited to the following:

- Parents
- Teachers
- Principals
- Students
- Charter school teachers, principals and other school leaders, when applicable
- Specialized instructional support personnel, including alternative education program staff
- Indian tribes or tribal organizations, when applicable
- Local government representatives
- Others with relevant and demonstrated expertise
- Community-based organizations

Comprehensive Needs Assessment

Districts receiving an allocation of at least \$30,000 must conduct a Comprehensive Needs Assessment at least once every three years (ESEA section 4106(d)). Districts must analyze available evidence to identify and prioritize local needs. The needs assessment must include valid, local data that demonstrates a need in an area that may be supported with Title IV, Part A funds. Districts must engage in timely and meaningful consultation with a broad range of stakeholders (see above) and should examine relevant data to understand students’ and schools’ most pressing needs, including the potential root causes of such needs. Please see Appendix C for the Sample Needs Assessment Process.

Prioritization of Funds

Each LEA establishes how it will prioritize the distribution of its Title IV, Part A allocation in five ways in accordance with ESEA section 4106(e)(2)(A) and may use multiple allocation methods. The district must use information from the needs assessment or other means if the district is not required to conduct a needs assessment to determine the best way to allocate funds in order to target the identified need(s).

Allocation methods:

1. Provide funding to schools with the greatest needs.
2. Target schools with the highest percentages or numbers of low-income students.
3. Comprehensive Student Support and Improvement status (CSI schools).
4. Targeted Support and Improvement status (TSI schools).
5. Identification as persistently dangerous public elementary or secondary school (currently not applicable).

Program Management

Funding Assurances

The District Funding Assurances are released in May each year and communication is sent in the commissioner's Monday email.

1. District Funding Assurances must be completed in GMAP (Due Sept.30)
2. District Funding Assurances statement must be uploaded in GMAP by the superintendent (not designee) (Due Sept. 30).
3. Federal Cash Request Assurances must be uploaded in GMAP (Due Sept. 30).

In accordance with ESEA section 4106(e) (2) and (f), a local school district or consortium of local school districts must assure in its application that it will:

1. Prioritize the distribution of funds to schools served by the local school district based on one or more of the following criteria:
 - a. Are among the schools with the greatest needs;
 - b. Have the highest percentages or numbers of children counted under section 1124(c) (i.e., children counted for purposes of basic grants to local school districts under Title I, Part A of the ESEA);
 - c. Are identified for comprehensive support and improvement under section 1111(c)(4)(D)(i) (i.e., are among the lowest-achieving schools);
 - d. Are implementing targeted support and improvement plans as described in section 1111(d)(2) (i.e., have consistently underperforming student subgroups; or
 - e. Are identified as a persistently dangerous public elementary school or secondary school under section 8532. (ESEA section 4106(e)(2)(A)).
2. For a local school district or consortium that receives \$30,000 or more, use:
 - a. Not less than 20%of funds to support one or more of the activities authorized under section 4107 pertaining to well-rounded educational opportunities;
 - b. Not less than 20%of funds to support one or more activities authorized under section 4108 pertaining to safe and healthy students; and
 - c. A portion of funds to support one or more activities authorized under section 4109(a) pertaining to the effective use of technology; including an assurance that it will not use

more than 15% of the remaining portion for purchasing technology infrastructure as described in section 4109(b). (ESEA section 4106(e)(2)(C)-(E)).

- d. Comply with section 8501-8504, regarding equitable participation of private school children and teachers. (ESEA section 4106(e)(2)(B)).
3. Complete an annual state report regarding how funds for the Title IV, Part A program are being used. (ESEA section 4106(e)(2)(F)).
4. Comply with all applicable requirements outlined in Sections 4106 - 4109 of the ESEA or its successor.
5. The district will maintain records that support their compliance with program requirements.

Supplement, Not Supplant

Section 4110 requires that Title IV, Part A program funds be used to supplement, and not supplant, non-federal funds that would otherwise be used for activities authorized under the Title IV, Part A program. This means that an LEA may not use Title IV, Part A program funds to carry out activities that would otherwise be paid for with state or local funds. In determining whether a particular use of funds would violate the non-supplanting requirement, LEAs should consider matters such as whether the cost involved is currently paid for using state or local funds or whether the cost involved is for an activity that is required by state or local law. In no event may LEAs decrease the amount of state or local funds used to pay the cost of an activity simply because of the availability of the Title IV, Part A program funds.

Program Evaluation and Progress Monitoring

ESEA section 4106(e)(1)(E) requires districts to describe in the application how the program will be periodically evaluated for effectiveness to reach the program objectives and outcomes. The district must come up with a reasonable, effective plan to evaluate and monitor the program for effectiveness to determine if any changes may need to be made in the program implementation, steps for continuous improvement, and next steps. Districts must document how they are evaluating the program, how often the program is being evaluated, and how the evaluation is being used to guide future decisions in the implementation process of the program. Program evaluation is extremely important as districts are required to report to the SEA the degree to which progress is being made toward meeting the objectives and outcomes (ESEA section 4104(a)(2)). Please see Appendix A for an example Activity Evaluation form.

Community Partnerships

ESEA section 4106(e)(1)(A) requires districts to list any partnerships with institutes of higher education, businesses, nonprofit organizations, community-based organizations, or other public or private entity with a demonstrated record of success in implementing activities that will be supported with Title IV, Part A funds. Districts are encouraged to reach out to any partners that may be able to support the program. When completing the application, districts need to list partner(s) that will be supporting the Title IV, Part A funded program and how the partnership will enhance student achievement. Some programs or activities may not involve a community partner, in which case, the district will just mark N/A in the box to indicate no partners are supporting the Title IV, Part A funded program. While districts may have partners with various groups to support multiple programs, only partnerships that are directly supporting the Title IV, Part A funded program should be listed within the application.

Recordkeeping

Districts participating in the Title IV, Part A funded program must maintain records showing they are complying with applicable statutes and regulations and that the activities implemented meet the program's purpose. In determining the documentation that must be maintained, KDE highly recommends reviewing the Title IV, Part A Monitoring Tool (Appendix D). The tool includes requirements and provides examples of the types of documentation that may be maintained for each. This document offers the opportunity to self-monitor your program as well.

Time and Effort

Time and effort documentation must be maintained for staff paid fully or partially with Title IV, Part A funds. Time and effort records prove that these staff work with the Title IV, Part A funded program in an amount proportionate to which they are paid from the program. Documentation must:

1. Be supported by a system of internal controls which provides reasonable assurance charges are accurate, allowable, and allocable to the program;
2. Be incorporated into official records;
3. Reasonably reflect total activity for which an employee is compensated;
4. Encompass all the employee's activities, both federal and non-federal;
5. Comply with established accounting policies and practices; and
6. Support distribution among specific activities or cost objectives.

Monthly and Semi-annual Certification

Monthly certification is completed when an employee's time is spent on multiple cost objectives. The employee must keep track of the time they spend on each cost objective each month. This is then signed by the employee and their immediate supervisor.

Semi-annual certification is completed when 100% of an employee's time is spent on a single cost objective. The semi-annual certification document needs to be signed and dated both by the employee and their immediate supervisor twice a year.

Sample time and effort reports may be found in Appendix B.

Use of Funds

Districts are allowed to use funds for allowable activities under the Well-Rounded Education, Safe and Healthy Students, and Effective Use of Technology component areas of the grant, as outlined in ESEA section 4107 – 4109 and also described in the [Title IV, Part A Non Regulatory Guidance](#). Districts that receive \$30,000 or more in Title IV, Part A funding must conduct a comprehensive needs assessment and also must allocate at least 20% in Well-Rounded Education, at least 20% in Safe and Healthy Students, and a portion in the Effective Use of Technology sections. The portion in Effective Use of Technology must be a reasonable amount to support a program or activity in this section.

Well-Rounded Education

The purpose of a well-rounded education is to provide an enriched curriculum and education experience to all students. Programs and activities supported in this section must be supplemental and may include:

- STEM
- Music and arts
- Foreign language instruction
- Accelerated learning programs
- Civics instruction
- College and career counseling
- Social Emotional Learning (SEL)
- Environmental education

Safe and Healthy Students

The purpose of this section is to improve school conditions for student learning. Funds may be used for any program or activity that fosters safe, healthy, supportive, and drug-free school environments, including direct student services and professional development and training for school staff.

Supplemental programs and activities in this section may include:

- Bullying and harassment prevention
- School dropout prevention
- Re-entry programs and transition services for justice involved youth
- Suicide prevention
- Drug and violence prevention
- School-based health and mental health services
- Healthy, active lifestyle, nutritional education
- Trauma informed classroom management
- Chronic disease management
- Physical activities
- Building school and community relationships

Effective Use of Technology

Programs and activities in this section of the grant must be used for increasing the effective use of technology to improve the academic achievement, academic growth, and digital literacy of all students. There is a special rule that states that no more than 15% of funds in this content area may be spent on technology infrastructure, which is defined as devices, equipment, software application, platforms, digital instructional resources and or/other one-time IT purchases. Supplemental ways funds may be used in this section:

- professional development training for teachers on:
 - utilizing educational programs in the classroom.
 - blended learning strategies.
 - educational platforms to deliver instruction.
- implementing digital citizenship initiatives that include strategies to address student safety.
- implementing school- and district-wide approaches to inform instruction, support teacher collaboration, and personalize learning including, but not limited to creating learning communities composed of students, fellow educators, museums, libraries, experts in various disciplines around the world, community organizations, and families.

Unallowable Uses of Funds

In determining how funds may be spent, the district first needs to ensure funds are supplemental and are following the “supplement, not supplant” provision. The second requirement is determining if the cost is:

1. Reasonable – not excessive in cost and based upon prudent and sound purchasing practices.
2. Necessary – essential for carrying out the needs-based Title IV, Part A program.
3. Allocable – cost is incurred specifically for the benefit of the program, distributed proportionately, an allowable activity, and meets the program’s intent.
4. Documented – the district can readily document the reasonableness, necessity, and allocability of the cost.
5. Compliant – with Cost Principles and the Federal Award.
6. Consistent – with Policies and Procedures applying uniformly to federal and non-federal activities and costs.

Federal funds cannot be spent on the following:

- Construction, renovation or repair of any school facility.
- Medical services for drug treatment or rehabilitation, *except for integrated student supports, specialized instructional support services, or referral to treatment for impacted students, which may include students who are victims of, or witnesses to, crime or who illegally use drugs.*
- Food or meals. *Light refreshments and snacks are allowed in certain circumstances.*
- Field trips for entertainment purposes.
- Anything that would NOT be directly related to education or transition (ex.: birthday parties, gift cards, entertainment).
- Direct reimbursements to private and non-public schools.

This is not an exhaustive list so if you have an expense that you are unsure would be allowable, please contact the Title IV, Part A program consultants.

Fiscal Responsibilities and Budgeting

GMAP and MUNIS Alignment

Once the district has an approved Consolidated Application, then the district’s finance officer will need to make sure the MUNIS budget is set up to match the categories and approved codes within GMAP. The MUNIS budget must be relatively close to the approved GMAP budget. Title IV, Part A has five budget categories. For FY21 (FFY20), those categories are: 552GA (Administrative Costs), 552GP (Private School), 552GS (Safe and Healthy Students), 552GT (Effective Use of Technology), and 552GW (Well-Rounded Educational Opportunities). If funds are allocated on one of the sections of the grant, then MUNIS must be set up to reflect funds in that category with the amounts listed under the codes that are approved in GMAP.

Release of Funds

Funds are released once the district has:

1. **An approved consolidated application**

The Education Department Administrative Regulations (EDGAR) [76.400](#) states SEAs must adhere to the following for subgrant grant applications:

- (a) *Review.* The state shall review the application.

- (b) *Approval – entitlement programs.* The state shall approve an application if:
- (1) The application is submitted by an applicant that is entitled to receive a subgrant under the program; and
 - (2) The applicant meets the requirements of the federal statutes and regulations that apply to the program.
- (c) *Approval - discretionary programs.* The state may approve an application if:
- (1) The application is submitted by an eligible applicant under a program in which the state has the discretion to select subgrantees;
 - (2) The applicant meets the requirements of the federal statutes and regulations that apply to the program; and
 - (3) The state determines that the project should be funded under the authorizing statute and implementing regulations for the program.
- (d) *Disapproval – entitlement and discretionary programs.* If an application does not meet the requirements of the federal statutes and regulations that apply to a program, the state shall not approve the application.

2. Completed the funding assurances

The district must complete the assurances in GMAP, print out a copy and take it to the district's local board for approval. The assurances statement must be uploaded by the superintendent (not the designee) after local board approval. The assurances are available in GMAP in early May and due Sept. 30.

3. Submitted the Federal Cash Request assurances

This must be submitted and uploaded into the GMAP District Documents Library by either the finance officer or superintendent who has authorization to request funds on behalf of the district. This is due Sept. 30.

Period of Availability

Title IV, Part A funds are available for obligation for a period of 27 months after July 1 of the year they are appropriated. This 27-month period includes the initial 15-month period of availability and an automatic 12-month extension permitted under the "Tydings Amendment." As an example, funds appropriated for federal fiscal year 2021 (School Year 22) first become available to the States on July 1, 2021 and remain available for obligation through Sept. 30, 2023.

When the period of availability for obligation ends (Sept. 30, 2023), grantees may not incur any further obligations, but they do have an additional 45-day liquidation period during which all outstanding obligations must be paid. Continuing the example above, School Year 22 funds may be drawn down until Nov. 17, 2023, to cover remaining unpaid obligations as of Sept. 30, 2023. On Dec. 26, 2023, the grant is considered closed and any remaining funds revert to USED.

Consolidated State Performance Report and State Reporting

In accordance with ESEA section 8303, districts are required complete the Consolidated State Performance Report (CSPR) reflecting the actual amount of funds spent in each of the three component areas of Well Rounded Education, Safe and Healthy Students, and Effective Use of Technology as well as funds spent for any private/non-public schools activities. LEAs are also required to report the degree to which they are making progress toward meeting the objectives and outcomes described in section 4106(e)(1)(E) as part of section 4104(a)(2). This data is collected via a survey sent to districts.

Equitable Services

Title IV, Part A funds are subject to equitable services requirements, as detailed in Title VIII of ESEA, and provided to private/non-public (PNP) schools located within the physical boundaries of the public school district. Districts must notify the PNP school officials within the district boundary in a timely manner of their right to participate in the federal program and set up a time to have meaningful consultation on the program and services that may be provided. Ongoing, meaningful consultation throughout the year is required.

Distribution of Funds and Equitable Services Requirement

Title IV, Part A requires local education agencies (LEAs) that receive \$30,000 or more in Title IV, Part A funds “use not less than 20 percent of funds received under this subpart” for each section of 4107 (well-rounded education) and 4108 (safe and healthy students), and “use a portion of funds received under this subpart” for section 4109 (effective use of technology).

The language – “funds received under this subpart” – means that these distribution requirements apply to an LEA’s total allocation, including any amount spent for equitable services to private school children and teachers. There is no requirement that the portion an LEA spends for equitable services separately meets these distribution requirements.

Example 1: *An LEA receives \$100,000 in Title IV, Part A funds.*

The distribution requirement for the LEA is:

- At least \$20,000 in Well-Rounded Education (includes private school services);
- At least \$20,000 in Safe and Healthy Students (includes private school services); and
- A reasonable portion in Effective Use of Technology (with no more than 15% of funds in this section spent on technology infrastructure, including private school services).

The district services three private schools that generate \$20,000 in equitable services. The district must ensure the distribution requirements between all three sections of the grant are met to include the service amount to private schools. If the private school is looking to utilize services for the purchase of technology infrastructure, the district must ensure both the district and private school total amounts do not exceed 15% of funds in the Effective Use of Technology section.

Example 2: *Brown County School District received \$100,000 in funds, and the equitable services portion is calculated at \$25,000 for services to three private schools.*

The district must spend at least \$20,000 in both the Well-Rounded Education and Safe and Healthy Students section of the grant, and a reasonable portion in Effective Use of Technology.

The private schools identified needing support in STEM instruction, training for teachers on trauma-informed practices and computers for their elementary school. Through consultation, the district and private school determined ways in which to provide services and resources that can reasonably meet the needs for both the district and private school. The district's distribution breakdown is:

- Administrative costs (2%): \$2,000
- Well-Rounded Education: \$37,5000 (\$11,000 private school services)
- Safe and Healthy Students: \$20,000 (\$10,000 private school services)
- Effective Use of Technology: \$40,500* (\$4,000 private school services for devices)

*The total amount that can be spent on devices in this example in the Effective Use of Technology section is \$6,075, which includes the combination of both the private school and district amounts spent in this section.

Determination of Funds Available for Equitable Services to Private Schools

Districts must reserve an equitable share of funds for PNP schools within the district boundary based upon the total enrollment of the PNP school and the district enrollment. The process for determining the equitable share of the LEA's entire Title IV, Part A allocation is similar to how the equitable share is determined with Title II, Part A.

| EXAMPLE OF FORMULA TO DETERMINE AMOUNT FOR TITLE IV, PART A EQUITABLE EXPENDITURES | |
|--|----------------------|
| A. Number of Students | |
| A1: LEA Enrollment | 900 |
| A2: Participating Private Schools Enrollment | 100 |
| A3: Total Enrollment = A1 + A2 | 1,000 |
| B. Title IV, Part A Allocation | |
| B1: Total LEA Allocation | \$25,000 |
| B2: Administrative Costs (for public and private school programs) | \$500 |
| B3: LEA Allocation Minus Admin Costs = B1-B2 | \$24,500 |
| C. Per Pupil Rate | |
| C1: B3 divided by A3 | \$24.50 |
| D. Equitable Services | |
| Amount LEA must reserve for equitable services for private school teachers and other educational personnel = A2 x C1 | \$2,450 ¹ |

Consultation

The LEA is required to notify the PNP schools within the district boundary of their ability to participate in the Title IV, Part A federal program. The LEA then must provide timely, meaningful consultation with the PNP schools that choose to participate. The consultation provides the LEA and PNP to review the needs of the PNP school, voice opinions and concerns and agree upon services that are reasonable, necessary, allocable and allowable under the Title IV, Part A program. After the initial consultation, there must be *ongoing consultation throughout the year*. The consultation should include topics such as:

- How the PNP school's needs are identified (e.g., what data was used to determine the need).

¹ See [ED 2016 Fiscal Changes Guidance](#), Q&A P-2.

- What services, programs, or resources will be offered.
- How, where, and by whom the services will be provided.
- How the services will be assessed and how the results of the assessment will be used to improve those services.
- The size and scope of the equitable services to be provided to the eligible private schoolchildren, teachers, and other educational personnel, the amount of funds available for those services, and how that amount is determined.
- How and when the services will be delivered, including a thorough consideration and analysis of the views of the private school officials on the provision of services through potential third-party providers.
- Whether the services will be provided directly through the LEA or through a third-party contractor.

Timing of Services

Equitable services must be provided during the fiscal year in which funds are obligated (ESEA section 8501(a)(4)(B)). This means that all services must be provided within the school year funds are received and cannot be carried over into the following school year.

Equitable Services LEA Fiscal Responsibilities

The LEA must maintain fiscal control of all resources or services provided to the PNP school that is participating in the Title IV, Part A program. Items purchased are property of the district, not the private/non-public school, and must be labeled and inventoried by the district. The district must maintain an inventory log of items purchased with federal funds for private school use. All services must be supplemental, secular, neutral and non-ideological in nature. Any professional learning, conference registration fees, resources, etc. must be paid by the district; non-public schools cannot be reimbursed.

Documentation Retention for Equitable Services Requirement

The district must maintain records and documentation of PNP notification, consultation and fiscal responsibilities. Examples of documentation the district may maintain include, but are not limited to:

1. Copy of the notification letter informing the PNP school of its ability to participate in the federal program along with the certified letter notification or other record to prove all PNP schools within the district boundary were notified.
2. Copy of the meeting minutes and documentation of information that was discussed during the consultation meeting with the PNP school that chose to participate, to include a sign-in sheet or record of those in attendance at the meeting.
3. Fiscal records showing the district made all purchases and maintains fiscal control of the program and services.
4. Inventory log maintained at the district level of items purchased with federal funds for private school use.

Equitable Services Additional Resources

For additional information and resources on the Equitable Services requirements, please see the [KDE State Ombudsman page](#).

Appendix A

Activity Evaluation

(This is a sample form. Districts can use this as a guide to review their activities stated in their respective applications.)

Name of school/location: _____

Date: _____

Name or type of activity: _____

Contact information: _____

Type of federal grant applied to the activity: _____

Target group of students: _____

Partnerships used to enhance activity objectives: _____

Learning objectives/goals for the activity: _____

If applicable, how the activity is correlated to the Needs Assessment:

Describe how success will be measured: _____

Mid-Year Evaluation (once the activity has been completed)

Describe what worked well, including what data supports this conclusion: _____

List any modifications with the activity to increase student achievement:

Appendix B

Time and Effort

SAMPLE: Semi-annual Time and Effort Certification

Kentucky Department of Education

Semi-Annual Certification for Salaries & Wages Charged to Federal Grants

Funding Source(s)*:

Supervisor: _____

All employees who are paid in full or in part with federal funds must keep specific documents to demonstrate the amount of time they spent on grant activities. Pursuant to 2 CFR 200.430(i)(1), charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed.

I understand that the positions(s) filled by the following employees are supported entirely by funds from the federal award for Title IV, Part A. I certify that ____% of the job duties of the employee(s) were related to activities in compliance with this grant award during the period from Jan. 1, 20__, through June 30, 20__.

The information recorded on this form is true and correct to the best of my knowledge.

Employee Name: _____

Position: _____

Title Funding(s) % _____

Supervisor Signature: _____

Date: _____

Must be signed by a supervisor having direct knowledge of the work performed by the employee.

*Funding Sources could have more than one source of funding. For example, the district may have an activity which is funded with one source and then supplemented by Title IV, Part A.

PERSONAL ACTIVITY REPORT (PAR)

Personnel Partially Paid from TITLE IV, Part A

School District _____

Month _____

Employee Name _____

Employee ID # _____

Payroll records must document staff at district and school level paid partially from Title IV, Part A funds.

- District personnel partially paid from Title IV, Part A funds must certify on a monthly basis that they worked a proportionate amount of time in each program from which they are paid.
- The certification must indicate the period covered by the certification and must be signed by the employee and the supervisor who has first-hand knowledge of the work performed.

| Reporting Period | PROGRAM | PROGRAM | PROGRAM | TOTAL HRS PER DAY | Reporting Period | PROGRAM | PROGRAM | PROGRAM | TOTAL HRS PER DAY |
|------------------|---------|---------|---------|-------------------|------------------|---------|---------|---------|-------------------|
| Day of Month | | | | | Day of Month | | | | |
| 1 | | | | | 16 | | | | |
| 2 | | | | | 17 | | | | |
| 3 | | | | | 18 | | | | |
| 4 | | | | | 19 | | | | |
| 5 | | | | | 20 | | | | |
| 6 | | | | | 21 | | | | |
| 7 | | | | | 22 | | | | |
| 8 | | | | | 23 | | | | |
| 9 | | | | | 24 | | | | |
| 10 | | | | | 25 | | | | |
| 11 | | | | | 26 | | | | |
| 12 | | | | | 27 | | | | |
| 13 | | | | | 28 | | | | |
| 14 | | | | | 29 | | | | |
| 15 | | | | | 30 | | | | |
| | | | | | 31 | | | | |
| TOTALS 1-15 | | | | | TOTALS 16-31 | | | | |

This certifies that the employee has completed work during the time period for the federal programs as indicated.

| | |
|---------------------|-----------------------|
| Employee Signature: | Supervisor Signature: |
| Date Signed: | Date Signed: |

District Personnel Activity Report (PAR) for Time and Effort



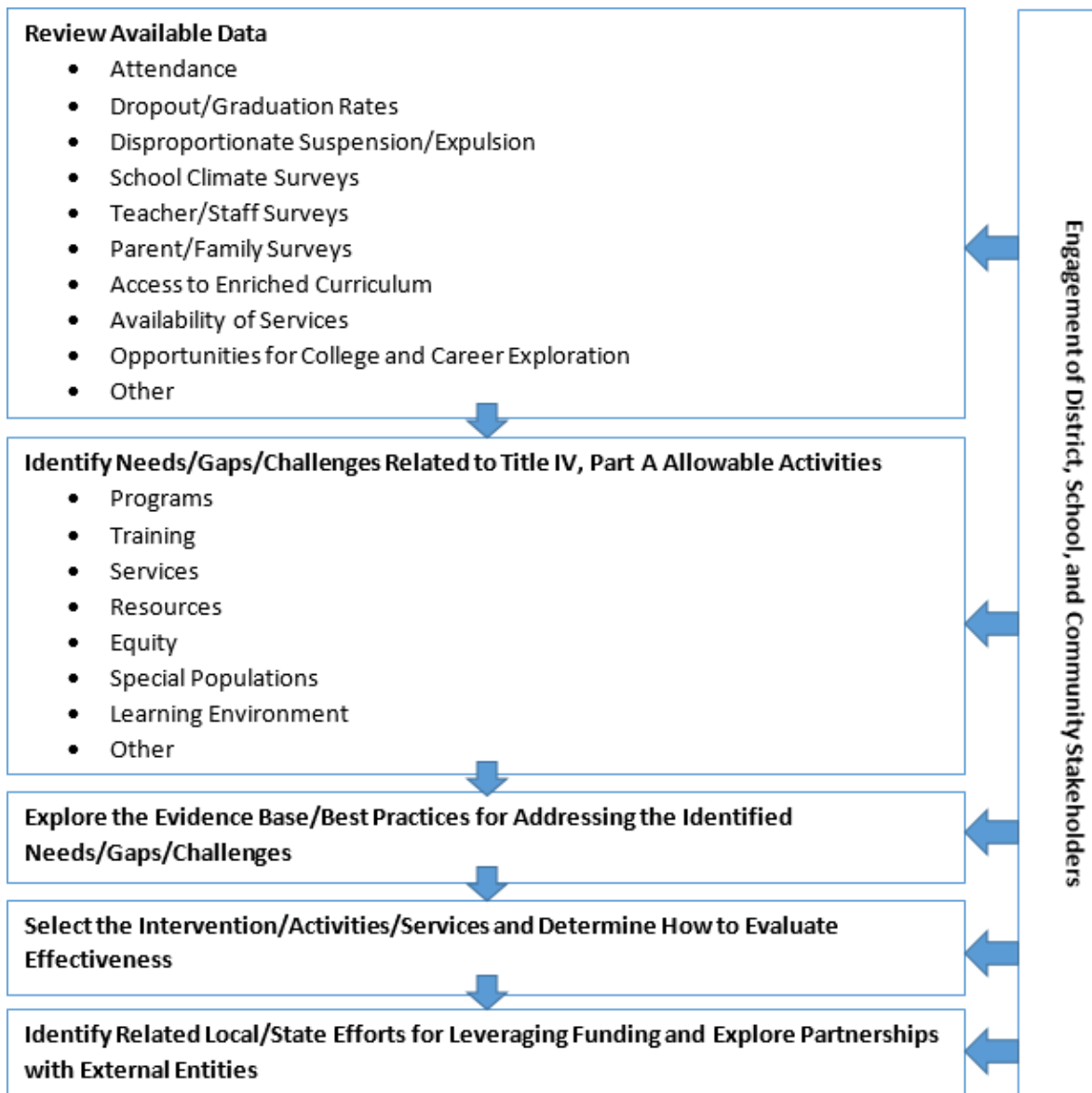
District/School: For the Month of:
 Employee: Year:
 Employee ID:
 Supervisor:

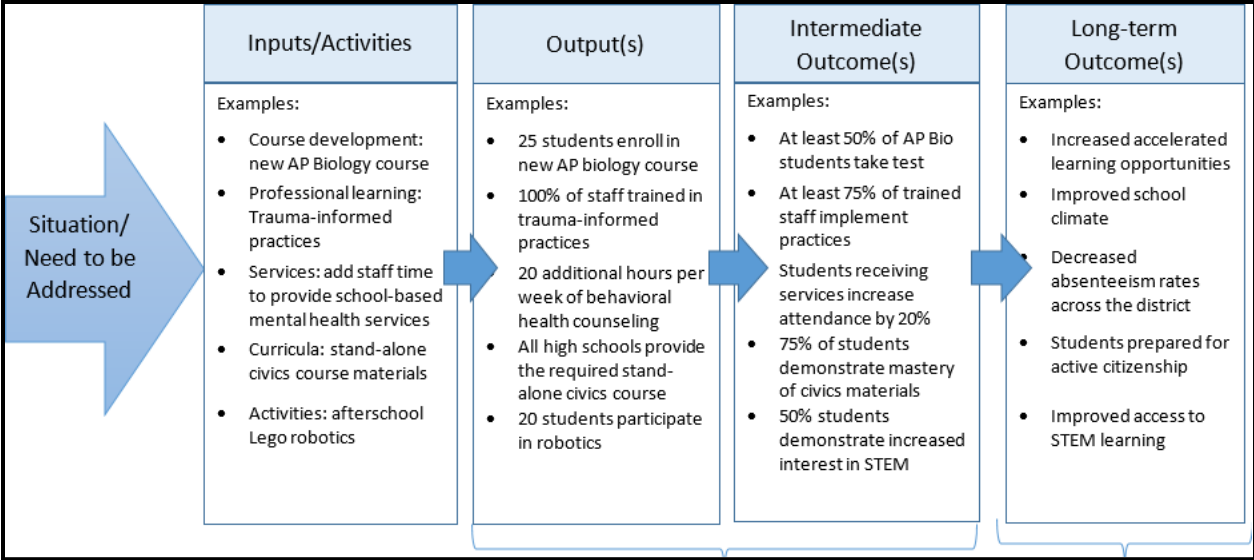
| PROGRAM or ACTIVITY | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | Total | % |
|----------------------------|--------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|------|--------|-------|-----|
| ex: - SRO | 75.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 75.00 | 75% |
| ex: SRO - Title IV, Part A | 25.00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 25.00 | 25% |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 0.00 | 0% |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 0.00 | 0% |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 0.00 | 0% |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 0.00 | 0% |
| Leave Time | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 0.00 | | |
| TOTAL | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100% | |

Appendix C

Sample Needs Assessment Process

The needs assessment process can help LEAs understand existing conditions in terms of gaps or challenges in services or activities and formulate a strategy for addressing those needs through the use of Title IV, Part A funds. A needs assessment is the most widely recognized approach for organizations of all kinds to prioritize and maximize limited resources. All LEAs are encouraged to undertake a needs assessment process, but it is only a grant requirement for LEAs that receive at least \$30,000 under Title IV, Part A. In order to develop a quality needs assessment, districts must engage stakeholders and look at district data to determine how to best utilize funds.





Appendix D

Title IV, Part A Monitoring Tool

As part of its responsibility outlined in ESEA section 4104(b)(1), the Kentucky Department of Education is required to monitor districts' program implementation. Districts are selected for monitoring based upon several factors, including the size of the Title IV, Part A award, timely submission of the consolidated application and other documents, length of time since the district has been monitored, and others. The purpose of monitoring will be to assist district Title IV, Part A coordinators, examine program design and effectiveness, ensure compliance with federal regulation, and support alignment to the approved Title IV, Part A portion of the consolidated application.

The following monitoring tool used by the KDE Title IV, Part A program consultants as part of the monitoring process ensures compliance with requirements outlined in the ESEA, Uniform Grant Guidance (UGG), and the Education Department General Administrative Regulations (EDGAR). The tool is being provided to the district coordinators to assist in evaluating the overall compliance of their program. This tool can be valuable in determining the degree to which program requirements are being fulfilled to strengthen program administration and quality.

During district monitoring events, the areas of review will include:

- Section 1: Program Development, Implementation, and Evaluation
- Section 2: Fiscal Management
- Section 3: Equitable Services to Private Schools

Program records and supporting documentation must be made available for review, and each monitoring indicator lists sample documentation which may be provided. Please note the sample documentation listed is not an all-encompassing list, as other forms of evidence may be provided.



| | | | |
|-------------------------------|------------------|-----------------------|------------------|
| District: | Superintendent: | Monitoring Dates: | Private Schools: |
| | | | Yes No |
| Title IV, Part A Coordinator: | Finance Officer: | KDE Program Monitors: | |
| | | | |

The following checklist is used in the evaluation of a district’s Title IV, Part A program. The Kentucky Department of Education (KDE) is required to conduct compliance reviews to ensure that school districts use funds in accordance with the authorizing statute. The objectives of the reviews are:

- To assess the degree to which program requirements are being fulfilled and make recommendations when appropriate; and
- To provide technical assistance and guidance to strengthen program administration and quality.

The tool itself is organized into sections that directly align with the Title IV, Part A sections of the Every Student Succeeds Act. Each section contains monitoring questions that will be evaluated individually. The list found under Evidence (within each monitoring question) contains

examples of documentation that may be submitted for review. Additionally, only documentation for the current school year must be submitted unless the program monitor(s) request(s) prior year information or it is applicable to the question.

During monitoring, the program monitor(s) will select an indicator for each monitoring item.

- Compliant means there is evidence that supports the approved application and compliance. The district provides sufficient evidence identified for meeting the compliance requirement and implementation of the approved Consolidated Application.
- Noncompliant means the district is unable to provide sufficient evidence identified for meeting the compliance requirement and implementation of the approved Consolidated Application.

On-site visits will include district staff, public and private schools receiving services under Title IV, Part A. Districts receiving federal funds must adhere to statute and federal grant requirements in the [Every Student Succeeds Act \(ESSA\)](#) and [Education Department General Administrative Regulations \(EDGAR\)](#) and other applicable grant regulations.

| Compliance Rating | |
|---|---|
| Compliant | Noncompliant |
| LEA provides sufficient evidence identified for meeting the compliance requirement and implementation of the approved LEA’s Consolidated Application. | LEA is unable to provide sufficient evidence identified for meeting the compliance requirement and implementation of the LEA’s approved Consolidated Application. |

| Section 1: Program Development, Implementation, and Evaluation | | | | | | |
|--|--|-----------------------|-------------------|----|-----|---|
| Compliance Requirement | | Example Documentation | Compliance Rating | | | Comments |
| | | | C | NC | N/A | C=Compliant, NC = Non-Compliant, N/A = Not Applicable |

Section 1: Program Development, Implementation, and Evaluation

| | | | | | | |
|-----|---|--|--|--|--|---|
| 1.1 | <p>STAKEHOLDER CONSULTATION</p> <p>All required stakeholders were consulted in the development and implementation of the district’s Title IV, Part A plan and periodic meetings were scheduled. Required stakeholders include parents, teachers, principals, other school leaders, specialized instructional support personnel, students, community-based organizations, local government representatives and others with relevant and demonstrated expertise.</p> <p>(ESEA section 4106 (c)(1-2))</p> | <ul style="list-style-type: none"> • Sign-in sheets • Stakeholder meeting minutes, agendas • Surveys/feedback (forms, emails, letters, etc.) • Meeting invitations • Letters/emails • Social media announcements | | | | |
| 1.2 | <p>NEEDS ASSESSMENT</p> <p>The LEA conducted a comprehensive needs assessment to examine the needs for improvement of access to, and opportunities for:</p> <ul style="list-style-type: none"> a) A well-rounded education for all students; b) School conditions for student learning in order to create a healthy and safe school environment; and | <ul style="list-style-type: none"> • CSIP/CDIP or other comprehensive needs assessment documents • Meeting dates, minutes and sign-in sheets • Documentation that contributed to the needs assessment (survey results, disciplinary records, course | | | | <p>(Required for districts that receive \$30,000 or more in Title IV, Part A funding. Must be conducted at least once every three years.)</p> |

Section 1: Program Development, Implementation, and Evaluation

| | | | | | | |
|------------|---|---|--|--|--|--|
| | <p>c) Personalized learning experiences supported by technology and professional development for the effective use of data and technology. (ESEA section 4106(d))</p> | <p>offerings, professional development schedules, etc.)</p> | | | | |
| <p>1.3</p> | <p>ACTIVITY EVALUATION The LEA evaluates the effectiveness of the activities and programs throughout the year based upon the objectives and district’s need based upon the comprehensive needs assessment. The district uses the periodic evaluation of data to determine effectiveness and future program planning. (ESEA section 4106(e)(1)(E))</p> | <ul style="list-style-type: none"> • Sample evaluations/Activity Evaluation Form • District planning documentation • Data review; PLC minutes • Surveys | | | | |

| Section 2: Fiscal Management | | | | | | |
|------------------------------|---|---|-------------------|----|-----|---|
| Compliance Requirement | | Evidence (Suggested documentation) | Compliance Rating | | | Comments/Submitted Documentation |
| | | | C | NC | N/A | C=Compliant, NC = Non-Compliant, N/A = Not Applicable |
| 2.1 | <p>ALLOCATIONS \$30,000 AND OVER</p> <p>Districts allocated and spent funds in all three sections of the grant with at least:</p> <ul style="list-style-type: none"> • 20% for Well-Rounded Education • 20% for Safe and Healthy Students • A portion for Effective Use of Technology <p>(ESEA section 4106(e)(2)(C-E))</p> | <ul style="list-style-type: none"> • MUNIS reports | | | | For districts receiving under \$30,000, write N/A. |
| 2.2 | <p>APPLICATION and BUDGET ALIGNMENT</p> <p>School(s) and district staffing patterns and financial expenditures/obligations to date are consistent with the approved Title IV, Part A GMAP application and budget. A separate accounting of Title IV, Part A funds is maintained in the MUNIS system and matches the categories set up in GMAP.</p> <p>(ESEA section 8306; 2 CFR 200.302)</p> | <ul style="list-style-type: none"> • Detailed MUNIS reports • Title IV, Part A approved GMAP budget | | | | |

Section 2: Fiscal Management

| | | | | | | |
|-----|--|--|--|--|--|--|
| 2.3 | TIME AND EFFORT REQUIREMENTS | <ul style="list-style-type: none"> • Written time and effort procedures for how the district will ensure that personnel charges to federal awards are accurate, allowable and properly allocated, including a process for after-the-fact review of interim charges made to the federal award based on budget estimates. • Documentation to support the allocability, veracity and accuracy of the work performed for all employees paid in whole or in part with Title IV, Part A funds. Signed, dated | | | | |
| | <p>The district has written procedures in place for time and effort. These written procedures should include instructions for:</p> <ul style="list-style-type: none"> • The completion of time and attendance reporting; • The approval cycle that is required; • The processing of personnel charges to federal awards; • The internal review process that will be established to ensure effective internal control over the federal award (2 CFR 200.430(i)); and • The necessary adjustment required so that the final amount charged to the federal award for the salary is accurate, allowable and properly allocated (2 CFR 200.430 (i)(8)). This justification must occur at least annually. <p>The district maintains documentation for any employees paid in full or in part with Title IV, Part A funds to support the allocability, veracity and accuracy of the work performed.</p> | | | | | |

Section 2: Fiscal Management

| | | | | | | |
|-----|--|---|--|--|--|--|
| | (2 CFR 200.430 (i). 2 CFR 200.430; 2 CFR 200.431) | semi-annual certification and/or monthly PAR reports, or another prior KDE-approved documentation system, should be provided. (Payroll charges must match the actual distribution of time recorded.) | | | | |
| 2.4 | <p>EQUIPMENT AND SUPPLIES</p> <p>Assets and equipment purchased with Title IV, Part A funds are appropriately tagged and clearly marked. The district has a system in place for marking items purchased with federal funds and disposal of items.</p> <p>(2 CFR 200.313; 2 CFR 200.314)</p> | <ul style="list-style-type: none"> • Inventory records • Reason for disposal and removal from master inventory • Copy of district protocols • Photos or samples of items tagged and labeled | | | | |
| 2.5 | <p>Internal Controls</p> <p>The district maintains adequate internal controls in the disbursement of Title IV, Part A funds.</p> | <ul style="list-style-type: none"> • Procurement policies and procedures • Signed invoices | | | | |

Section 2: Fiscal Management

| | | | | | | |
|------------------------------|--|--|--|--|--|--|
| Section 2: Fiscal Management | | | | | | |
| | (ESEA section 8306; 2 CFR 200.303) | | | | | |
| 2.6 | <p>Supplement/Not Supplant</p> <p>The district documents that Title IV, Part A funds supplement, not supplant, general funds or programs/activities required by state or local law.</p> <p>(ESEA section 4110 and 8306)</p> | <ul style="list-style-type: none"> • Expenditure reports • Signed assurances • MUNIS report • Board meeting minutes • School council general funds staffing allocations | | | | |
| 2.7 | <p>RETENTION REQUIREMENTS FOR RECORDS</p> <p>All Title IV, Part A records are kept for the current year and three previous years.</p> <p>(2 CFR 200.334)</p> | <ul style="list-style-type: none"> • Board policy • Title IV, Part A records (upon request) | | | | |

Private School Name: _____

Private School Title IV, Part A Coordinator: _____

| Section 3: Equitable Services to Private Schools | | | | | | |
|--|--|--|-------------------|----|-----|--|
| Compliance Requirement | | Evidence – Suggested Documentation | Compliance Rating | | | Comments/Action Required |
| | | | C | NC | N/A | C=Compliant, NC = Non-Compliant, N/A= Not Applicable |
| 3.1 | <p>PRIVATE/NON-PUBLIC SCHOOLS SERVED</p> <p>Are there private/non-public schools being served by Title IV, Part A? (Complete the following if non-public schools exist in the district <u>and</u> have elected to participate). (ESEA section 8501; 34 CFR 76.651)</p> | <ul style="list-style-type: none"> List of participating non-public schools List of all private schools in the district Letters to private or home schools; evidence of receipt (postal return receipt) Declaration of participation | | | | |
| 3.2 | <p>NON-PUBLIC SCHOOL CONSULTATION</p> <p>In consultation with the private/home school, the district completed the required Equitable Service Consultation packet. (ESEA section 8501)</p> | <ul style="list-style-type: none"> Signed consultation form | | | | |

Section 3: Equitable Services to Private Schools

| | | | | | | |
|-----|---|---|--|--|--|--|
| 3.3 | <p>ONGOING COMMUNICATION</p> <p>The district has two-way, ongoing communication with private schools served by Title IV, Part A in order to determine needs of those schools and whether those needs are being met.</p> <p>(ESEA section 8501; 2 CFR 76.652)</p> | <ul style="list-style-type: none"> • Records of consultation meetings (meeting minutes, sign-in sheet, agenda) • Evidence of regular consultation with private school officials (emails, phone call notes, meeting minutes, etc.) | | | | |
| 3.4 | <p>PROGRAM IMPLEMENTATION</p> <p>The district implements and oversees private school services. District verifies services provided are allowable and non-ideological.</p> <p>(ESEA section 8501(a)(2))</p> | <ul style="list-style-type: none"> • Consultation agenda • Surveys; consultation form; needs assessments; invoices; evaluation • Invoices for services | | | | |
| 3.5 | <p>FISCAL OVERSIGHT</p> <p>Expenditures have been made for the non-public school on an equitable basis and in accordance with the consultation packet and</p> | <ul style="list-style-type: none"> • Invoices • Detailed MUNIS • Title IV, Part A GMAP budget • Consultation packet | | | | |

Section 3: Equitable Services to Private Schools

| | | | | | |
|-----|---|---|--|--|--|
| | <p>approved GMAP application. The district maintains fiscal control over all services provided.</p> <p>(ESEA section 8501; 34 CFR 76.651)</p> | | | | |
| 3.6 | <p>EQUIPMENT AND SUPPLIES</p> <p>The district maintains documentation of items purchased on behalf of the private schools. Procedures have been established for the retrieval of Title IV, Part A purchases made on behalf of private schools when the materials are no longer needed for program purposes. The procedures require that retrieved purchases be distributed equitably among participating private schools.</p> <p>(ESEA section 8501(d); 34 CFR 76.661)</p> | <ul style="list-style-type: none"> • Disposal of equipment procedures • Inventory logs • Photos of labeled items purchased | | | |
| 3.7 | <p>PRIVATE SCHOOL PROGRAM EVALUATION</p> <p>The district evaluates the effectiveness of strategies and activities funded under Title IV, Part</p> | <ul style="list-style-type: none"> • Private school needs assessment • Evaluation forms • Evidence of program evaluation | | | |

Section 3: Equitable Services to Private Schools

| | | | | | | |
|-----|--|---|--|--|--|--|
| | A and uses this data to determine future program planning. (ESEA section 4106(e)(1)(E)) | (surveys, data, etc.) | | | | |
| 3.8 | COMPLAINT PROCEDURE Non-public school and home school officials have been notified of the district’s complaint procedure, in the event there is a question of equitability of services. (ESEA section 8501) | <ul style="list-style-type: none"> • Consultation packet • Interview • Copy of complaint procedure | | | | |

Appendix E

Title IV, Part A Performance Review Self-Assessment

As a recipient of Title IV, Part A grant funds from the U.S. Department of Education (USED), the Kentucky Department of Education (KDE) is required to conduct compliance reviews to ensure that school districts use funds in accordance with the authorizing statute. The objectives of the reviews are:

- To assess the degree to which program requirements are being fulfilled and make recommendations when appropriate; and
- To provide technical assistance and guidance to strengthen program administration and quality.

For monitoring, the areas of review will include: (1) program development, implementation and evaluation; (2) financial management; and (3) participation of private schools. Program records and supporting documentation must be made available for review and each monitoring indicator lists sample documentation that may be provided. Please note the sample documentation listed is not an all-encompassing list, as other forms of evidence may be provided.

Instructions: Please respond to each self-assessment question. For items requesting a brief response, please provide a narrative answer or submit responsive documentation and indicate in the response (a) the document(s) that are responsive to each question, and (b) the specific page or pages of the relevant documents that address each question. Please include each document file name in the “Submitted Documentation File Name(s)” column. In some cases, the same document may be responsive to multiple questions. In that case, you can submit the documentation once and refer to it in multiple questions (including page numbers for each section, as relevant).

I. Program Development, Implementation and Evaluation

| Requirement | District Response | Submitted Documentation File Name(s) |
|--|---|--------------------------------------|
| <p>A. STAKEHOLDER CONSULTATION All required stakeholders were consulted in the development and implementation of the district’s Title IV, Part A plan and periodic meetings were scheduled. Required stakeholders include parents, teachers, principals, other school leaders, specialized instructional support personnel, students, community-based organizations, local government representatives and others with relevant and demonstrated expertise. (ESEA section 4106 (c)(1-2))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Agendas</i> • <i>Meeting minutes</i> • <i>Sign-in sheets (Names and areas of representation should be included for all shareholder groups)</i> • <i>Meeting invitations</i> • <i>Surveys/feedback</i> • <i>Letters/emails</i> • <i>Social media announcements</i> | <p><i>Enter brief response here</i></p> | |

| Requirement | District Response | Submitted Documentation File Name(s) |
|---|---|---|
| <p>B. NEEDS ASSESSMENT</p> <p>The LEA conducted a comprehensive needs assessment to examine the needs for improvement of access to and opportunities for:</p> <ul style="list-style-type: none"> • A well-rounded education for all students; • School conditions for student learning in order to create a healthy and safe school environment; and • Personalized learning experiences supported by technology and professional development for the effective use of data and technology. <p>(ESEA section 4106(d))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>CSIP/CDIP or other comprehensive needs assessment documents</i> • <i>Meeting dates, minutes and sign-in sheets</i> • <i>Documentation that contributed to the needs assessment (survey results, disciplinary records, course offerings, professional development schedules, etc.)</i> | <p><i>enter brief response here</i></p> | |
| <p>C. ACTIVITY EVALUATION</p> | <p><i>enter brief response here</i></p> | |

| Requirement | District Response | Submitted Documentation File Name(s) |
|--|-------------------|---|
| <p>The LEA evaluates the effectiveness of the activities and programs throughout the year based upon the objectives and district’s need based upon the comprehensive needs assessment. The district uses the periodic evaluation of data to determine effectiveness and future program planning. (ESEA section 4106(e)(1)(E))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Sample evaluations/activity Evaluation form</i> • <i>District planning documentation</i> • <i>Data review; PLC minutes</i> • <i>Surveys</i> | | |

II. Financial Management

| Requirement | Yes | No | N/A | District Response | Submitted Documentation File Name(s) |
|---|-----|----|-----|----------------------------------|--------------------------------------|
| <p>A. ALLOCATIONS \$30,000 AND OVER</p> <p>Districts allocated and spent funds in all three sections of the grant with at least:</p> <ul style="list-style-type: none"> • 20% for Well-Rounded Education • 20% for Safe and Healthy Students • A portion for Effective Use of Technology <p>(ESEA section 4106(e)(2)(C-E))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Financial expenditures on detailed MUNIS</i> | | | | <i>Enter brief response here</i> | |
| <p>B. APPLICATION AND BUDGET ALIGNMENT</p> <p>School and district staffing patterns and financial expenditures/obligations to date are consistent with the approved Title IV, Part A GMAP application and budget. A separate accounting of Title IV, Part A funds is maintained in the MUNIS system and matches the categories set up in GMAP.</p> | | | | <i>enter brief response here</i> | |

| Requirement | Yes | No | N/A | District Response | Submitted Documentation File Name(s) |
|---|-----|----|-----|----------------------------------|--------------------------------------|
| (ESEA section 8306; 2 CFR 200.302) Suggested Documentation: <ul style="list-style-type: none"> • Detailed MUNIS reports • Title IV, Part A approved GMAP budget | | | | | |
| C. TIME AND EFFORT REQUIREMENTS The district has written procedures in place for time and effort. These written procedures should include instructions for: <ul style="list-style-type: none"> • The completion of time and attendance reporting; • The approval cycle that is required; • The processing of personnel charges to federal awards; • The internal review process that will be established to ensure effective internal control over the federal award (2 CFR 200.430(i)); and • The necessary adjustment required so that the final amount charged to the federal award for the | | | | <i>enter brief response here</i> | |

| Requirement | Yes | No | N/A | District Response | Submitted Documentation File Name(s) |
|--|-----|----|-----|-------------------|--------------------------------------|
| <p>salary is accurate, allowable and properly allocated (2 CFR 200.430 (i)(8)). This justification must occur at least annually.</p> <p>The district maintains documentation for any employees paid in full or in part with Title IV, Part A funds to support the allocability, veracity and accuracy of the work performed. (2 CFR 200.430 (i))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Written time and effort procedures for how the district will ensure that personnel charges to federal awards are accurate, allowable and properly allocated, including a process for after-the-fact review of interim charges made to the federal award based on budget estimates.</i> • <i>Documentation to support the allocability, veracity and accuracy of the work</i> | | | | | |

| Requirement | Yes | No | N/A | District Response | Submitted Documentation File Name(s) |
|--|-----|----|-----|----------------------------------|--------------------------------------|
| <p><i>performed for all employees paid in whole or in part with Title IV, Part A funds. Signed, dated semi-annual certification and/or monthly PAR reports, or another prior KDE-approved documentation system, should be provided. (Note: Payroll charges must match the actual distribution of time recorded.)</i></p> | | | | | |
| <p>D. EQUIPMENT AND SUPPLIES Assets and equipment purchased with Title IV, Part A funds are appropriately tagged and clearly marked. The district has a system in place for marking items purchased with federal funds and disposal of items. (2 CFR 200.313; 2 CFR 200.314)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Inventory records</i> • <i>Reason for disposal and removal from master inventory</i> • <i>Copy of district protocols</i> • <i>Photos or samples of items tagged and labeled</i> | | | | <i>Enter brief response here</i> | |
| <p>E. INTERNAL CONTROLS</p> | | | | <i>enter brief response here</i> | |

| Requirement | Yes | No | N/A | District Response | Submitted Documentation File Name(s) |
|--|-----|----|-----|----------------------------------|--------------------------------------|
| <p>The district maintains adequate internal controls in the disbursement of Title IV, Part A funds. (ESEA section 8306; 2 CFR 200.303)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Procurement policies</i> • <i>Signed invoices</i> | | | | | |
| <p>F. SUPPLEMENT/NOT SUPPLANT The district documents that Title IV, Part A funds supplement, not supplant, general funds or programs/activities required by state or local law. (ESEA section 4110 and 8306)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Expenditure reports</i> • <i>Signed assurances</i> • <i>MUNIS report</i> • <i>Board meeting minutes</i> | | | | <i>enter brief response here</i> | |
| <p>G. RETENTION REQUIREMENTS FOR RECORDS All Title IV, Part A records are kept for the current year and three previous years. (2 CFR 200.334)</p> <p>Suggested Documentation:</p> | | | | <i>enter brief response here</i> | |

| Requirement | Yes | No | N/A | District Response | Submitted Documentation File Name(s) |
|---|-----|----|-----|-------------------|--------------------------------------|
| <ul style="list-style-type: none"> • <i>Board policy</i> • <i>Title IV, Part A records (upon request)</i> | | | | | |

III. Participation of Private Schools

| Requirement | Yes | No | N/A | Submitted Documentation File Name(s) |
|---|-----|----|-----|--------------------------------------|
| <p>A. PRIVATE/NON-PUBLIC SCHOOLS SERVED Are there private/non-public schools being served by Title IV, Part A? (Complete the following if non-public schools exist in the district <u>and</u> have elected to participate). (ESEA section 8501; 34 CFR 76.651) If no is checked, no further action is required for this section.</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>List of participating non-public schools</i> • <i>Letters to non-public schools; evidence of receipt</i> • <i>Declaration of participation</i> | | | | |
| <p>B. NON-PUBLIC SCHOOL CONSULTATION The district consulted with participating non-public schools (NPS) and has completed the required Equitable Service Consultation packet. (ESEA section 8501)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Signed and dated consultation packet</i> | | | | |
| <p>C. ONGOING COMMUNICATION The district has two-way, ongoing communication with NPS served by Title IV, Part A in order to determine needs of those schools and whether those needs are being met. (ESEA section 8501; 2 CFR 76.652)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Records of consultation meetings (meeting minutes, sign-in sheet, agenda)</i> • <i>Evidence of regular consultation with private school officials (emails, phone call notes, meeting minutes, etc.)</i> | | | | |
| <p>D. PROGRAM IMPLEMENTATION</p> | | | | |

| Requirement | Yes | No | N/A | Submitted Documentation File Name(s) |
|---|-----|----|-----|--------------------------------------|
| <p>The district implements and oversees NPS services. District verifies services provided are allowable and non-ideological. (ESEA section 8501(a)(2))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Consultation agenda</i> • <i>Surveys; consultation form; needs assessments; invoices; evaluation</i> • <i>Invoices for services</i> | | | | |
| <p>E. FISCAL OVERSIGHT</p> <p>Expenditures have been made for the non-public school on an equitable basis and in accordance with the consultation packed and approved GMAP application. The district maintains fiscal control over all services provided. (ESEA section 8501; 34 CFR 76.651)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Invoices</i> • <i>Detailed MUNIS</i> • <i>Title IV, Part A GMAP budget</i> • <i>Consultation packet</i> | | | | |
| <p>F. EQUIPMENT AND SUPPLIES</p> <p>Procedures have been established for the retrieval of Title IV, Part A purchases made on behalf of private schools when the materials are no longer needed for program purposes. The procedures require that retrieved purchases be distributed equitably among participating private schools. (ESEA section 8501(d); 34 CFR 76.661)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Disposal of equipment procedures; inventory logs, photos or samples of items tagged and labeled</i> | | | | |
| <p>G. PRIVATE SCHOOL PROGRAM EVALUATION</p> | | | | |

| Requirement | Yes | No | N/A | Submitted Documentation File Name(s) |
|---|-----|----|-----|--------------------------------------|
| <p>The district evaluates the effectiveness of strategies and activities funded under Title IV, Part A and uses this data to determine future program planning. (ESEA section 4106(e)(1)(E))</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Private school needs assessment</i> • <i>Meeting minutes/sample evaluation forms</i> • <i>Data</i> • <i>Surveys</i> | | | | |
| <p>I. COMPLAINT PROCEDURE</p> <p>Non-public school and home school officials have been notified of the district’s complaint procedure, in the event there is a question of equitability of services. (ESEA section 8501)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>Consultation packet</i> • <i>Interview</i> • <i>Copy of complaint procedure</i> | | | | |