



Title I, Part A District Coordinator Webinar

October 29, 2019

Logistics

- ▶ To submit a question, send an email to tara.rodriguez@education.ky.gov
- ▶ The webinar will be recorded and posted on the Title I Documents and Resources webpage.



Review of September Webinar Topics

▶ District fiscal responsibilities

- Carryover
- Comparability



Agenda

- ▶ **Updates and reminders**
 - **Monitoring**
 - **Comparability**
- ▶ **Monitoring, findings and recommendations**
- ▶ **Updated guidance on Equitable Services**
- ▶ **Census 2020**
- ▶ **National ESEA Conference February 4-7, 2020**



Updates and Reminders

- ▶ **Consolidated Monitoring notifications were sent to ten districts. On-site monitoring will begin in January.**
- ▶ **Eight districts were selected for distance monitoring.**
- ▶ **Comparability reports due November 1**



State Agency Responsibility



- ▶ **The state educational agency is responsible for the oversight of federal grants.**
 - Approving applications [ESSA 1112(a)(3)(B)]
 - Monitoring programs [2 CFR 200.331]
 - Providing technical assistance [ESSA 1111(c)]
 - Submit accurate data to USED [ESSA 1111(h)]
- ▶ **KDE must ensure the proper use of grant funds and that programs support the purpose and intent of Title I.**

Monitoring

- ▶ Not a gotcha
- ▶ Technical assistance to support continuous improvement
- ▶ Two monitoring processes: Consolidated monitoring and Distance (desk) monitoring
- ▶ Title I consolidated monitoring
 - Involves review of evidence and on-site visit
 - District, Title I schools and participating private schools
- ▶ Distance (desk) monitoring
 - Mostly focuses on district-level processes such as comparability and supplement not supplant
 - No site visit unless necessitated by findings



CFR 200.331 Requirements for Pass-Through Entities (Risk assessment)



(b) Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in paragraphs (d) and (e) of this section, which may include consideration of such factors as:

(1) The subrecipient's prior experience with the same or similar subawards;

(2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program;

(3) Whether the subrecipient has new personnel or new or substantially changed systems; and

(4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency).

Source: [Code of Federal Regulations 200.331](#)

CFR 200.331 Requirements for Pass-Through Entities (Monitoring required)



(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:

(1) Reviewing financial and performance reports required by the pass-through entity.

(2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.

Source: [Code of Federal Regulations 200.331](#)

Selection for monitoring (Consolidated and Distance) is based on risk (CFR 200.331)



▶ Consolidated Monitoring Risk Assessment

- Includes Title I-specific risk factors and a common pool which consists of factors like size of award
- Monitoring occurs on a 5-year rotation
- Districts with the highest risk score within each year's rotation selected for monitoring

▶ Distance Monitoring Risk Assessment

- Based on Title I data
- Districts with the highest risk score selected for distance monitoring
- All 172 districts eligible. Not on rotational basis.

Frequently Asked Question

- ▶ My district was selected for Title I distance monitoring last year. Could we be selected for consolidated monitoring this year?



Consolidated Monitoring



- ▶ Consolidated monitoring typically includes several programs:
 - Alternative Education Programs
 - Career and Technical Education
 - Gifted and Talented
 - IDEA—Special Education Services
 - Preschool services
 - Title I, Part A
 - Title II, Part A
 - Title III/English Learner and Immigrant Students
 - Title IV Part A (Distance/desk monitoring only)
 - Title V, Part B (Rural Education Achievement Program)

Statewide Consolidated Monitoring

- ▶ Each of the programs conducts its process in its normal manner while visiting the district.
- ▶ The Title I monitoring team will create Actions Needed reports for districts and Title I schools. Title I Actions Needed forms are not posted to the web page. They contain program strengths, findings and recommendations.
- ▶ After the monitoring visit, the monitoring team also will collaborate to create a consolidated report with strengths that were observed across programs and recommendations.
- ▶ The consolidated report will be presented to the district and posted on KDE's website.



Consolidated Monitoring Web Page



Non-Public School Ombudsman

School Improvement Grants

Statewide Consolidated Monitoring ▾

Title I, Part A - Improving Academic Achievement of the Disadvantaged

Title I, Part C - Education of Migratory Children

Title I, Part D - Children and Youth Who Are Neglected, Delinquent or At-Risk

Title IX, Part A - Education for Homeless Children and Youth

Title V, Part B - Rural Education Achievement Program (REAP)

Title III English Learners

STATEWIDE CONSOLIDATED MONITORING

2018–19 Consolidated Monitoring Process

Published: 9/26/2019 2:05 PM

A group of ten districts were selected and a monitoring lead coordinated with a district contact person to schedule the visit for all individual programs.

The districts monitored and the final reports provided from the Statewide Consolidated Monitoring visit in 2018-19 are shown below:

- [Bourbon County](#)
- [Caverna Independent](#)
- [Christian County](#)
- [Franklin County](#)
- [Glasgow Independent](#)
- [Montgomery County](#)
- [Raceland Independent](#)
- [Shelby County](#)
- [Silver Grove Independent](#)
- [Simpson County](#)

Distance Monitoring

- ▶ Distance monitoring for Title I
- ▶ Typically no site visit unless findings necessitate a follow-up visit
- ▶ Actions Needed forms will describe strengths, findings, and recommendations
- ▶ All findings must be satisfied. Districts must submit evidence they have made required changes to bring program components into compliance.



Findings and Recommendations on Actions Needed Forms

- ▶ **Findings:** Compliance issues that must be addressed by a deadline.
- ▶ **Recommendations:** Intended to improve program effectiveness. Actions are not required to address recommendations.
- ▶ **Failure to satisfactorily address a finding will result in further actions as allowable under the Code of Federal Regulations (CFR) Sections 200.338-200.342.**



Code of Federal Regulations 200.207 Specific Conditions

- ▶ **Additional specific award conditions may be imposed under certain circumstances. Examples of additional award conditions are**
 - **Requiring additional, more detailed financial reports;**
 - **Requiring additional project monitoring;**
 - **Requiring the non-Federal entity to obtain technical or management assistance**

Source: [Code of Federal Regulations 200.207 Specific Conditions](#)



Code of Federal Regulations 200.338: Remedies for Noncompliance



§200.338 Remedies for noncompliance.

If a non-Federal entity fails to comply with Federal statutes, regulations or the terms and conditions of a Federal award, the Federal awarding agency or pass-through entity may impose additional conditions, as described in §200.207 Specific conditions. If the Federal awarding agency or pass-through entity determines that noncompliance cannot be remedied by imposing additional conditions, the Federal awarding agency or pass-through entity may take one or more of the following actions, as appropriate in the circumstances:

- (a) Temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or pass-through entity.
- (b) Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
- (c) Wholly or partly suspend or terminate the Federal award.
- (d) Initiate suspension or debarment proceedings as authorized under 2 CFR part 180 and Federal awarding agency regulations (or in the case of a pass-through entity, recommend such a proceeding be initiated by a Federal awarding agency).
- (e) Withhold further Federal awards for the project or program.
- (f) Take other remedies that may be legally available.

Source: [Code of Federal Regulations 200.338](#)

Code of Federal Regulations: Termination

- ▶ **200.339 Termination of federal award**
- ▶ **200.340 Notification of termination requirement**
- ▶ **200.341 Opportunities to object, hearings and appeals**
- ▶ **200.342 Effects of suspension and termination**



Updated Equitable Services Non-Regulatory Guidance

- ▶ Equitable Services Non-Regulatory Guidance updated and recently issued
- ▶ Updated topics include allowable uses of funds, obligation of funds to ensure services occur in a timely manner, carryover of unobligated funds, and calculation of the share of Title I funds available for equitable services.



Census 2020

How the 2020 Census Affects Children

- ▶ The 2020 Census count impacts the federal funds that communities receive each year for programs and services that are critical for schools, students, and younger children, such as:
 - Special education, Head Start, after-school programs, and classroom technology.
 - Food assistance, including free and reduced-price school lunches.
 - Maternal and child health programs.

Source: [2020 Census: Why 2020 Matters for Schools](#)



Census Timeline

- ▶ The [Important Dates web page](#) provides the timeline for the Census, including these dates:
 - January 2020: The Census Bureau begins counting the population in remote Alaska.
 - April 1, 2020: Census Day is observed nationwide. By this date, every home will receive an invitation to participate in the 2020 Census.
 - December 2020: The Census Bureau delivers apportionment counts to the President and Congress as required by law.



Census for Educators

- ▶ [The Census web page for educators](#) provides new Statistics in Schools resources that spotlight the 2020 Census and the importance of counting everyone, especially children
- ▶ Web site includes actions educators can take to promote Statistics in Schools and a full count of children in the 2020 Census



National ESEA Conference 2020

- ▶ Conference focused on ESEA federal programs
- ▶ View the [session descriptions and schedule](#)
- ▶ February 4-7, 2020 in Atlanta, Georgia
- ▶ Hosted by the National Association of ESEA State Program Administrators
- ▶ Registration is now open! Visit the [National ESEA Conference web site](#) for more information



Resources

- ▶ [Code of Federal Regulations 200.519](#) (also discusses risk in federal programs)

