



Kentucky Department of

Our Children,

Our Commonwealth

Education

Title I, Part A District Coordinator Webinar

June 25, 2020



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.



Recap from May Webinar

- ▶ **Title I application in GMAP**
- ▶ **Questions from April webinar**
- ▶ **Upcoming training and technical assistance opportunities**



Agenda

- ▶ Updates and reminders
- ▶ Allowable costs and allowability process
- ▶ Parent and family engagement ideas and allowable expenditures



GMAP Due Date

- ▶ **FY21 Consolidated Application due date is June 30.**
- ▶ **All sections for each federal grant must be complete before the application can be submitted to KDE.**
- ▶ **Once submitted, consultants from each federal program will provide feedback, which may require additional attention at the district level.**
- ▶ **Funding will not be released to the district until every federal grant funding section receives an OK.**



Allowable Costs

- ▶ **Title I costs must be allowable under the Title I program. What this means is:**
 - **Costs must only benefit eligible students (eligible students = all students in a schoolwide program and identified students in a target assistance program).**
 - **Costs must be permissible under Title I and ESSA. For example, a school operating a schoolwide program should be able to demonstrate that a Title I cost is consistent with the school's needs assessment and schoolwide plan.**
 - **Costs must be necessary and reasonable.**



Allowability Procedures

- ▶ Required written procedures must address how you are ensuring that costs on the federal grant are allowed under the individual Federal program *and* in accordance with the cost principles established in the [Uniform Grant Guidance](#).



Written Allowability Procedures



- ▶ Required under CFR 200.302(b)(7)
- ▶ There are several factors that affect the allowability of costs (CFR 200.403). All costs must be:
 - Necessary, reasonable and allocable
 - Adequately documented
 - Conform with federal law and grant terms
 - Consistent with state and local policies
 - Consistently treated. A cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost
 - In accordance with generally accepted accounting principles
 - Not included as a cost or used to meet cost-sharing or matching requirements of any other federally financed program

Reasonable

Not excessive in cost and based on prudent and sound purchasing practices.

- ▶ Does the cost of the expense seem reasonable in comparison to other comparable examples I have encountered?
- ▶ What examples could I provide to any auditor to document the cost is reasonable?



Necessary

Essential for carrying out the needs-based, Title I, Part A program.

- ▶ Could the cost be deemed necessary for the operation of a quality, efficient Title I, Part A program?
- ▶ Is the need for the cost supported in the Needs Assessment, CDIP/CSIP, a statement in the GMAP application or another needs-assessment format?
- ▶ What examples could I provide to any auditor to document the cost is necessary?



Allocable

Cost is incurred specifically for the benefit of the program, distributed proportionately, an allowable activity and meets the program's intent.

- ▶ Does the cost meet the intent of the Title I, Part A program?
- ▶ What does guidance, statute, regulation or uniform guidance say about the allowability of this cost?
- ▶ Is the cost incurred proportionately by the program to provide needed support? For example, if a program pays 100% of the cost for the service, that program must receive 100% of the benefit.
- ▶ If costs are shared with another program, are both programs receiving benefit in an amount proportionate to what each program paid for the service?
- ▶ Are Title I funds being used to meet the requirements of other programs? Title I, Part A funds, for example, cannot be used to meet the requirements of another federal program.
- ▶ Is the category for this purchase listed in the [2020-21 KDE funding matrix chart](#) and/or allowable MUNIS codes in GMAP? If it's not listed, that may be because it is not allocable.
- ▶ What examples could I provide to any auditor to document the cost is allocable?



Documented

- ▶ **Could the reasonableness, necessity and allocability of the cost be documented through allowability procedures, the needs assessment, school or district plan, standard purchasing processes or district policy?**



Allowability

- ▶ Approval of a Title I application signifies the activities and budgeted amounts meet federal and KDE requirements and the district may begin to implement the activities in the approved application.
- ▶ KDE cannot approve funds for activities that are not defined or are vague.
- ▶ Narratives are required in GMAP to explain the purpose of the funds and identify the school(s) that will be using the funds.



Requirements to Receive Funds

Note: Release of new year funds is contingent upon the following:

District Funding Assurances completed in GMAP (Grant Management Application and Planning System), District Funding Assurances Statement uploaded in GMAP by the superintendent (not the designee), Federal Cash Request Statement of Assurances uploaded in GMAP and an approved consolidated GMAP application

Source: [KDE Federal Grants web page](#)



Parent and Family Engagement

- ▶ [KDE Title I Part A Handbook](#)
- ▶ [Systemic Family Engagement: A Comprehensive Guide to Implementing an Effective Title I Parent and Family Engagement Program](#)

