



Title I, Part A District Coordinator Webinar

April 27, 2023



Kentucky Department of
E D U C A T I O N

Logistics

- Submit questions or comments in the chat or send an email to erin.sudduth@education.ky.gov.
- The webinar will be recorded and posted on the Title I Documents and Resources webpage.

Recap from March Webinar

- Parent and family engagement policies
- Requirements of the school-level policy
- Requirements of the school-family compact
- Policy and compact best practices

Agenda

- Review and discussion of new [Title I, Part A Carryover Information](#) document available on the Kentucky Department of Education (KDE) Title I, Part A Documents and Resources webpage.
 - Background information and explanation of terms
 - Title I, Part A 15% carryover limitation
 - Spending carryover funds/Carryover of required reservations
 - Carryover limitation waiver
 - Creating a process for monitoring carryover

Obligation

- Point at which a party has entered into a binding commitment to pay out money.
- [34 CFR 76.707](#) of the Education Department General Administrative Regulations (EDGAR) outlines when obligations are made.
 - Personal services by an employee of the state or subgrantee – Obligation occurs when the services are performed.
 - Personal services by a contractor who is not an employee of the state or subgrantee – Obligation occurs on the date on which the state or subgrantee makes a binding written commitment to obtain the services.
 - Travel – Obligation occurs when the travel is taken.
 - Rental of real or personal property – Obligation occurs when the state or subgrantee uses the property.

Period of Performance

- Total amount of time funds from a federal grant are available for obligation.
- Title I, Part A has a 27-month period of performance
 - Initial grant period = 15 months
 - Begins July 1 of the federal fiscal year *Note, districts cannot draw down on funds until the consolidated application has been approved in the Grant Management Application and Planning (GMAP) system.
 - Tydings period = 12 months
 - Granted automatically under the Tydings Amendment of section 421(b)(1) of the General Education Provisions Act (GEPA) and [34 CFR 76.709](#) of EDGAR.

Carryover Limitation

- Section 1127(a) of the Every Student Succeeds Act (ESSA) states that not more than 15% of the Title I, Part A funds allocated to a district for any fiscal year may remain available for obligation for one additional fiscal year.
- Districts must ensure that at least 85% of Title I, Part A funds are obligated for activities that occur no later than Sept. 30 of the following fiscal year.
- As stated in ESSA 1127(c), this carryover limitation does not apply to districts that receive less than \$50,000 in Title I, Part A funds for the fiscal year.

2022-23 Period of Performance

- July 1, 2022
 - Initial grant period begins
 - Districts with approved applications may begin obligating funds
- Sept. 30, 2023
 - Initial grant period ends
 - At least 85% of total allocation must be obligated
 - Remaining funds become “carryover funds”
- Oct. 1, 2023
 - Tydings period begins
 - No more than 15% of total allocation may be carried over
- Sept. 30, 2024
 - Tydings period ends
 - 100% of total allocation must be obligated
 - Unobligated funds revert to U.S. Treasury

Carryover of Required Reservations

- Funds which are required to be reserved and spent on a specific purpose retain their character and must be spent on their original designated purpose when carried over to the subsequent fiscal year.
 - Parent and family engagement [See ESSA 1116(a)(3)]
 - Homeless and McKinney-Vento [See ESSA 1113(c)(3)(A)]
 - Equitable services for participating private schools [See ESSA 1117(a)(4)(B)]

Carryover Limitation Waiver

- ESSA 1127(b) allows KDE to waive the carryover limitation for districts once every three years if:
 - It determines that a district's request is reasonable and necessary; or
 - Supplemental appropriations for this subpart become available.
- Districts receive notification and instructions on how to request a waiver in the fall.
- KDE maintains a list of districts that have received a waiver and when the district is eligible to request another waiver.

Waivers to the Carryover Limitation due to COVID-19

- The U.S. Department of Education (USED) granted a waiver of the 15% carryover limitation requirement to all states for the 2019-20 school year.
- KDE requested and was granted waivers for two additional school years.
 - 2019 – 2020 (Project 310F)
 - 2020 – 2021 (Project 310G)
 - 2021 – 2022 (Project 310I)
- Allowed KDE to grant a district's carryover request more than once in a three-year period.

Carryover Waiver Eligibility Table

The dates in this table refer to the state fiscal year (FY) and the corresponding school year (SY).

Most Recent Carryover Waiver Received	Project Number	Eligible for Another Carryover Waiver
FY 2020 (SY 2019-20) Received in September 2020	310F	FY 2023 (SY 2022-23) Eligible to request September 2023
FY 2021 (SY 2020-21) Received in September 2021	310G	FY 2024 (SY 2023-24) Eligible to request September 2024
FY 2022 (SY 2021-22) Received in September 2022	310I	FY 2025 (SY 2024-25) Eligible to request September 2025

Waiver Ineligibility

- KDE does not have the authority to grant a district an additional carryover waiver during the three-year window.
- In the event a district with more than 15% carryover at the established deadline does not receive a carryover waiver due to ineligibility will have their allocation reduced by the exact amount exceeding the 15% limitation and the funds will be made available to other districts per ESSA 1126(c).

Example

	Amount	Percent of Total Allocation
1. Total SY 2021-22 allocation (funds become available July 1, 2021)	\$1,000,000	
2. Minimum obligation for initial grant period (July 1, 2021 – Sept. 30, 2022)	\$850,000	85%
3. Maximum amount district may carry over into the next fiscal year (Oct. 1, 2022 – Sept. 30, 2023)	\$150,000	15%
4. Actual amount district obligated for the initial grant period (July 1, 2021 – Sept. 30, 2022)	\$700,000	70%
5. Amount unobligated as of Sept. 30, 2022	\$300,000	30%
6. Amount by which the district is over the carryover limitation (Line 5 – Line 3) *This amount would be available for KDE to reallocate to other districts as provided under ESSA 1126(c)	\$150,000	

Process for Monitoring Carryover

- [2 CFR 200.303](#) requires non-federal entities establish and maintain effective internal control over the federal award.
- The creation and implementation of written processes is an example of an internal control.
 - A policy alone is not sufficient.
 - High-level view of the various functions necessary to accomplish a specific task.
 - Outlines specific steps the district is required to take to receive an end result.
- A process to monitor carryover and the expenditure of funds is one of several processes KDE reviews during monitoring.

Guiding Questions

- Who is responsible for monitoring the expenditure of program funds?
- How often will the remaining balances be checked? How will updates on the remaining balances be shared with the applicable parties?
- How will the district keep track of the period of performance for each grant and ensure the “oldest” funds are used first?
- How will you ensure staff are familiar with the process? How will you ensure it's being implemented with fidelity?

Questions?

Upcoming Webinar Dates

- Thursday, May 25, 10-11 a.m. ET
- Thursday, June 29, 10-11 a.m. ET
- Thursday, July 20, 10-11 a.m. ET
- Thursday, Aug. 31, 10-11 a.m. ET
- Thursday, Sept. 28, 10-11 a.m. ET
- Thursday, Oct. 26, 10-11 a.m. ET