



Title II, Part A Updates

Lynn Kemper, Title II Education Consultant
ECTAC December 2017 Quarterly Meeting



Will there be funding for 2018-19 Title II, Part A (?)

- Currently, neither the House nor the Senate have Title II included as part of the federal budget.
- This does not mean it won't be added at a later date.
- Congress may or may not re-appropriate Title II funds for 2018-19 school year.

2017-18 Application Update

- 47 – Award letters issued
- 17 – Program approval; currently with grants management
- 13 – Received feedback; district still working on edits
- 0 – Not reviewed

2017-18 Monitoring

- Work papers were released via email on 11/27/2017
- Districts will submit via online monitoring system
 - Hopeful for a January 2018 opening

2017-18 FINAL allocations

- Final allocations will be released later this month around the same time as the certified roll letters.
- Districts should submit one amendment to include both of these updates/changes.
- Email with specific directions will be sent.

Friendly Reminder:

Supplement, Not Supplant

- From the assurances section of this year's application:

“The LEA assures that funds received will be used to supplement and, to the extent practical, increase the level of funds that would be made available from nonfederal sources; in no case will such funds be used to supplant funds from nonfederal sources, in accordance with section 2301.”

Friendly Reminder:

Supplement, Not Supplant

ESSA SEC. 2301:

“SEC. 2301. SUPPLEMENT, NOT SUPPLANT.

“Funds made available under this title shall be used to supplement, and not supplant, non-Federal funds that would otherwise be used for activities authorized under this title.

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Friendly Reminder:

Supplement, Not Supplant

- This is also outlined on page D-23 of the Green Book:

Supplement, Not Supplant

In accordance with program-specific authorizing laws and regulations implementing those laws, federal funds must generally be used to increase, to the extent practical, the level of nonfederal funds that would be available in the absence of federal funds, and in no case to replace these nonfederal funds.

- Title II, Part A funds cannot be used to *replace*, or off-set, state and local investments in education.

How do I know if I am supplanting?

Is this expense something that, in the past, was paid with general revenue, state funds, or local funds?

If Title II, Part A funds were to go away completely, would the district continue to fund this activity/position using other revenue sources?

Is the LEA using Title II, Part A funds to provide something that is required by local, state law or policy, or other federal law?

How do I know if I am supplanting?

- If the answer to any of the previous questions is “YES,” then supplanting may be occurring.
- If you are still unsure if you may be supplanting, please let me know. We can look at your Title II, part A activities together and discuss.

2017-18 Equitable Services: Consultation Process Reminder

- In accordance with [section 8501\(c\)\(3\)](#), consultation must occur before the LEA and private schools make any decisions that affect the opportunities for eligible private school children, teachers and other educational personnel to participate in Title II, Part A programs.
- LEAs should begin planning consultation dates/times **now** for the 18-19 school year. Consultation should begin in early Spring.

2017-18 Equitable Services: Consultation Process Reminder

- Pursuant to [section 8501\(c\)\(3\)](#), consultation should continue throughout the implementation and assessment of activities.

2017-18 Equitable Services: Consultation Process Reminder

- Please read the Equitable Services technical assistance document for ESSA regulation guidance on:

- Notification Requirements
- Consultation and Planning
- Documentation of Consultation
- Determining Allocations
- Roll Forward
- Allowable Activities
- Control of Funds and Reimbursement
- Record Keeping
- FAQs



2017-18 Equitable Services

- **Do not withhold allocation amounts from private schools** – send preliminary allocation amounts ASAP; update private schools with final allocation amounts when received

2017-18 Equitable Services

- Additional consultation(s) should occur once final allocations are received to discuss allocation changes (and possible program/activity changes due to changing dollar amounts).

2017-18 Equitable Services

- It is recommended that districts share their equitable services allocation calculation with private schools as well.

Example of Formula to Determine Amount for Title II, Part A Equitable Services	
A. Number of Students	
A1. LEA Enrollment	900
A2. Participating Private Schools Enrollment	100
A3. Total Enrollment = A1 + A2	1,000
B. Title II, Part A Allocation	
B1. Total LEA Allocation	\$1,000,000
B2. Administrative Costs (for public and private school programs)	\$50,000
B3. LEA Allocation Minus Admin Costs = B1 – B2	\$950,000
C. Per Pupil Rate	
C1. B3 divided by A3	\$950
D. Equitable Services	
Amount LEA must reserve for equitable services for private school teachers and other educational personnel = A2 x C1	\$95,000

2017-18 Equitable Services

- Administrative, Indirect Costs

Indirect Cost and Administrative Costs

Indirect cost is defined in 2 CFR §200.414, Indirect (F&A) costs.

School Districts - The Florida Department of Education has been given the authority by the U.S. Department of Education to negotiate indirect cost proposals and to approve indirect cost rates for school districts. School districts are not required to develop an indirect cost proposal, but if they fail to do so, they will not be allowed to recover any indirect costs. Amounts from zero to the maximum negotiated rate may be approved for a program or project by the Department of Education's Comptroller. Indirect costs shall only apply to federal projects. Additional information and forms are available at <http://www.fldoe.org/comptroller/>.

(green book – section C-16)

2017-18 Equitable Services

■ Administrative, Direct Costs

Indirect Cost vs. Direct Cost for Administrative and Clerical Staff

2 CFR §200.413 (c), the salaries of administrative and clerical staff, should normally be treated as indirect (F&A) costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

1. Administrative or clerical services are integral to a project or activity;
2. Individuals involved can be specifically identified with the project or activity;
3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
4. The costs are not also recovered as indirect costs.

(green book – section C-16)

2017-18 Equitable Services

- Administrative, Direct Costs:
 - May be portions of salaried positions related to the running of the grant/infrastructure
 - Manages grant documents
- Direct admin costs are NOT salaried positions responsible for delivery of program activities or services

2017-18 Equitable Services

Administrative, Direct Costs:

- All or a percentage of some salaried positions may be considered direct admin cost, dependent on a detailed position description.
- A title alone is not sufficient to differentiate between direct admin and program delivery.

Administrative Direct Cost?

- **Instructional Coaches to Support Beginning Teachers and New Teachers** – The LEA will implement the use of instructional coaches to increase the effectiveness of beginning teachers as well as teachers that are new to the district. The instructional coach at each school will provide embedded professional learning to each beginning teacher as well as those teachers who are new to the district.

Administrative Direct Cost?

- **Instructional Coaches to Support Beginning Teachers and New Teachers –**

These positions are generally NOT direct admin costs.

The coaches provide program delivery and support to teachers; the coaches do not manage Title II grant documents directly.

Administrative Direct Cost?

- **Curriculum Specialists:** Curriculum specialists create curriculum maps, modules, and resources that help teachers determine how best to carry out standards-aligned instruction. In addition, curriculum specialists design and facilitate professional learning to help teachers understand how to use those maps, modules, assessments, and other best practices to enhance their instruction and improve their craft.

Administrative Direct Cost?

- **Curriculum Specialists:**

These positions are generally NOT direct admin costs.

The specialists provide program delivery and support to teachers; the specialists do not manage Title II grant documents directly.

Administrative Direct Cost?

- **Director of Leadership Development** - This position was created to expand the capacity of principals and assistant principals to perform as effective leaders in their schools within the district. Director will support and facilitate monthly contact and/or meetings to review, support, and oversee administrative recruitment progress goals, hiring, and leadership plans-of-action.

Administrative Direct Cost?

- **Director of Leadership Development –**
This position is generally NOT a direct admin cost.

The director provides program delivery and support to district leadership; the director does not manage Title II grant documents directly.

Administrative Direct Cost?

- **Director of Professional Development** - ensures the PD dept. provides a variety of high-quality, impactful, and relevant PD opportunities that align with the four strands of the FLDOE PD Protocol Standards (planning, learning, implementing, and evaluating). In addition, assesses system-wide staff development needs, sets specific goals, supports, directs, and plans PD activities to meet specific district, charter, and private school needs, and evaluates effectiveness of implemented programs.

Administrative Direct Cost?

- **Director of Professional Development -**

This position is generally NOT a direct admin cost.

The director provides program delivery and support by planning, organizing, and evaluating PD within the district; the director does not manage Title II grant documents directly.

Administrative Direct Cost?

- **Title II-A Grant and Program Director** – administers and monitors all aspects of the Title II-A program. Position is responsible for preparing the application and amendments of the project and ensures compliance with the program description, implementation, and budgets.

Administrative Direct Cost?

- **Title II-A Grant and Program Director – All or a percentage of this position may be considered direct admin cost.**

The director manages Title II grant documents directly, but part of the position description mentions that the director “...ensures compliance with the program description, implementation.”

Administrative Direct Cost?

- **Title II-A Grant and Program Director – continued**

All or a percentage of this position may be considered direct admin cost.

In addition, the job title “grant and program director” means that some responsibilities for this position may be associated with the program delivery of activities or services.

Administrative Direct Cost?

- **Equitable Services Program Coordinator** – assists in coordinating equitable share consultations with private and charter schools; manages reimbursements for private school teachers for secular professional development courses/training; meets with private schools regularly to provide ongoing consultation services.

Administrative Direct Cost?

- **Equitable Services Program Coordinator**
All or a percentage of this position may be considered direct admin cost.

In this scenario, we would need more information about the responsibilities for this position. Does this person have any responsibility for direct services to teachers/principals? If so, that portion of their salary would not be considered direct admin cost.

Administrative Costs

- If you are still unsure which of your budget items are considered direct admin cost, please let me know. We can look at your budget together and make determinations based on position descriptions.



Questions?

You may also email questions to Lynn.Kemper@fldoe.org

Contact Information

Lynn Kemper

Lynn.Kemper@fldoe.org

850/245-7804