

# **New Director's Institute July 29, 2021**

## **Opening Session Day 2**

**NCDPI  
Federal Program Monitoring & Support Division**

# Welcome & Introductions





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# House Keeping

## Wifi Information

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# Fiscal Procedures

Pg 11-13

# Fiscal Procedures

- General fiscal guidelines apply to all federal grants that DPI administers and as such, all local finance officers and program directors should be familiar with them. The Fiscal Guidance document was designed by the School Finance Division at DPI to assist PSUs and other subgrantees in administration of federal grants.



# Uniform Grant Guidance (UGG)

- Regulations from the Office of Budget and Management (OMB), codified as Title 2 of the Code of Federal Regulations (2CFR) Part 200, govern all federal grants awarded by the USED to the state or to PSUs and other subrecipients awarded on or after December 26, 2014. Refer to the page for details on Uniform Grant Guidance (UGG) and the revised Education Department General Administrative Regulations (EDGAR).



# Homeless

pages 40 and 60-61

- Under ESSA, homeless education is included in Title IX, Part A. The Education of Homeless Children and Youth Program entitles children experiencing homelessness to a free, appropriate public education and requires schools to remove barriers to their enrollment, attendance, and success in school. The goals of the program are to:
  - Provide immediate enrollment of homeless children and youth not already enrolled in school. This includes reviewing and revising any laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, and success of a student
  - Provide school stability for students experiencing homelessness by allowing them to remain in their school of origin when this is in the child's or youth's best interest and provide transportation to and from the student's school of origin at the parent's/guardian's or the homeless liaison request
  - Ensure that homeless students are provided services in such a way that they are not isolated or stigmatized
  - Promote school success and completion for homeless students
  - Support collaboration between school districts and community agencies serving homeless students

# Homeless

pages 40 and 60-61

## *The McKinney-Vento Act*

A federal educational law for the identification of and the serving of homeless children and youth in LEAs, including charter schools, lab schools, virtual schools, etc.

➤ ***Main themes of the law include:***

- School access
- School stability
- Support for academic success
- Child-centered, best-interest decision making
- Critical role of the local homeless education liaison
- Critical role of the office of the state coordinator

➤ ***Key rights of students include:***

- Right to immediate enrollment even when records not present
- Right to remain in the school of origin, if in the student's best interest
- Right to receive transportation to and from the school of origin
- Support for academic success
- And other rights

# Homeless Continued...

pages 40 and 60-61

## *State & Local Program Priority Areas*

- Compliance
  - Conduct, Oversee, & Monitor
- Data Collection
- Training, Technical Assistance, & Professional Development
- Needs Assessments, Plans
- Policy Review and Development
- Disputes
- Collaboration
- Funding
  - Title I Set-Aside Funds
  - Subgrants
  - Mini-grants
  - ARP I (Subgrantees & Mini-grantees)
  - ARP II



## Homeless Continued...

pages 40 and 60-61



SCHOOL YEAR	AVERAGE ANNUAL COUNTS CHILDREN & YOUTH IDENTIFIED IN NC SCHOOLS
2006-2007SY	12,000
2007-2008SY	17,000
2008-2009SY	19,000
2009-2010SY	23,000
2010-2011SY	26,000
2011-2012SY	28,000
2012-2013SY	27,000
2013-2014SY	27,000
2014-2015SY	27,000
2015-2016SY	27,000
2016-2017SY	28,000
2017-2018SY	31,000
2018-2019SY	37,000
2019-2020SY	28,000
2020-20221SY	24,000

# Foster Care

page 41

- Under the ESEA, as amended by the ESSA, there are specific provisions for students in Foster Care that took effect in December of 2016. Regarding Title I, Part A, funds can be used to implement strategies and programs to remove the barriers incurred through a child being in foster care. Typically, the greatest need is determining the best school for the student to attend to ensure academic success.
- This determination cannot be determined based on cost or difficulty of transportation, rather the decision must be determined in the best interest of the student.
- Excess transportation costs are an allowable expense under Title I, Part A and should be included in the funds set aside for foster care, if the PSU decides to use funds for this reason. PSU's must enter the foster care contact into the CCIP application, Title I Grant Details section.

# EVERY STUDENT SUCCEEDS ACT (ESSA)

## Foster Care

- Established protections for children in foster care under Title I, Part A (Title I).
- These provisions complement the requirements of the Fostering Connections to Success and Increasing Adoptions Act of 2008 (Fostering Connections Act) and further promote the purpose of Title I – to ensure that all children receive a high-quality education and to close achievement gaps between student groups. Together these laws strengthen opportunities for educational agencies and child welfare agencies to jointly determine the most effective practices to remove enrollment barriers and promote school stability and success for students.

# <https://serve.uncg.edu/projects/nc-foster-care/>

On December 10, 2015 the President signed into law the [Every Student Succeeds Act of 2015 \(ESSA\)](#), which reauthorizes the Elementary and Secondary Education Act (ESEA). The Every Student Succeeds Act establishes new protections for children in foster care under Title I, Part A (Title I). These provisions complement the requirements of the Fostering Connections to Success and Increasing Adoptions Act of 2008 (Fostering Connections Act) and further promote the purpose of Title I – to ensure that all children receive a high-quality education and to close achievement gaps between student groups. Together these laws strengthen opportunities for educational agencies and child welfare agencies to jointly determine the most effective practices to remove enrollment barriers and promote school stability and success for students.

## Ensuring Educational Stability for Children in Foster Care

Joint guidance from the U.S. Departments of Education and Health and Human Services about implementation of the foster care provisions of the Every Student Succeeds Act (ESSA) was released on June 23, 2016. This link, <http://www2.ed.gov/policy/elsec/leg/essa/index.html> will guide you to a 28-page guidance document as well as to two Dear Colleague Letters. The document delivers a strong message that the unique needs of children in foster care must be addressed. These provisions went into effect December 10, 2016, at which time state and local child welfare and education agencies began conversations about their shared responsibility to support the school stability and success of students in foster care. The foster care provisions of ESSA, coupled with the school stability provisions of the Fostering Connections Act, envision shared responsibility for school stability and success between child welfare and education agencies. This joint guidance offers details about the requirements under the new law, provides examples from around the country about "what's working" to support students in foster care, and will be a critical resource in implementation efforts.



NC Foster Care Program resources

# Title I Pre-K Memorandum of Understanding (MOU)

Handbook Reference pages 41-42



# Title I Preschool

- YES! Title I Funds May Be Used For Preschool
- YES! The ESEA as amended by ESSA requires a Memorandum of Understanding with HS and other ECE programs, if feasible
- YES! You will find resources for all things Title I Preschool in the Federal Programs Handbook on pp. 41 and 42
- YES! Room 102 of the Breakout Sessions will have a Preschool Overview
- Yes! We are committed to support and serve you





# Time and Effort

pages 14-16

- Compensation for personal services, 2 CFR 200.430, by an individual employed by the PSU includes all remuneration, paid currently, or accrued, for services of employees rendered during the period of performance under the Federal award, including but not necessarily limited to wages and salaries. Compensation may also include fringe benefits. Costs of compensation are allowable to the extent that they satisfy the specific requirements noted below and that the total compensation for individual employees:
- Is reasonable for the services rendered and conforms to the established written policy of the non-Federal entity consistently applied to both Federal and non-Federal activities.
- Follows an appointment made in accordance with the non-Federal entity's laws or written policies.
- Is determined and supported by appropriate documentation.

# Time and Effort



- Uniform Guidance no longer explicitly requires semi-annual certifications or personnel activity reports (PARs) as support for compensation expenses.
- PSUs may continue to use their current internal control system of semi-annual certifications, PAR reports, or approved substitute systems but are not required to use these controls.
- If a PSU decides not to use semi-annual certifications or PAR reports, the PSU is still required to maintain auditable "time and effort" documentation that describes how each employee, paid in part or whole from federal funds, has spent his or her compensated time.

# Internal Controls

- PSUs must establish and maintain effective fiscal control and fund accounting procedures (i.e., internal controls) for federal funds in accordance with the Code of Federal Regulations 2 CFR 200.303.

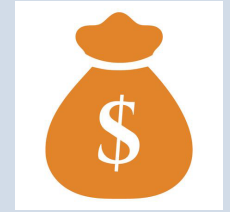
# Procurement

Handbook Reference p. 20-22

# Methods of Procurement

- Procurement transactions (purchases) of both goods and services must be conducted in a manner to provide open and free competition.
- Procurement transactions must consider price, quality, service, and other factors important to the subgrantee as set out in the Uniform Guidance in 2 CFR § § 200.218- 200.227.

# Grant Award Notifications GANS



Page 22

## **SY 2021-22 Grant Award Notification Letters**

- This year the Grant Award Notification (GAN) letters will be located within CCIP.
- In order to ensure the PSU information is correctly represented on the GAN, an organizational section is being added to the Consolidated Application within CCIP. This section will open soon and will be located at the beginning of the Consolidated Application. Some PSU have already submitted their FY22 Consolidated Application. Any submitted application will be returned to the PSU automatically by the CCIP system when the new section deploys.
- The PSU will need to complete the organizational section of the application and resubmit. If you have any questions, please contact your regional program administrator.



# Period of Performance Flexibility

- The intent of federal funds is to benefit students in the fiscal year in which the grant is awarded, as indicated on the Grant Award Notice (GAN). The award notice is for 15 months, with a tidings waiver for an additional 12 months for a total of 27 months. Regarding purchases that cross grant periods (software, computers, equipment), DPI is providing flexibility as follows:
  - Purchases may extend beyond one year to take advantage of cost reductions if the students in the current fiscal year receive benefit from the purchase
  - Leases and licenses – If instructional software subscriptions are purchased after January, the PSU will need to provide explanation within the budget description indicating how students in the current fiscal year will benefit from the purchase

# Fiscal Monitoring

pages 23-24



- The fiscal monitoring reviews are performed in a similar manner to the program reviews. Fiscal Monitors within the Monitoring and Compliance (MAC) Section housed under the Internal Audit Office perform a risk assessment based on the PSUs and charter schools each year.
- The Fiscal Monitoring Report will be sent the PSUs/charter schools within sixty (60) of the on-site review. PSUs must respond to any Corrective Actions. When all compliance issues are sufficiently resolved, a closing letter is issued.

# Full Fiscal Onsite Monitoring Reviews

- The full on-site monitoring reviews (or their virtual alternatives) will focus on the following areas:
  - Allowable Costs
  - Procurement (Contracted Services)
  - Personal Services (Time and Effort)
  - Property Standards (Equipment and Inventory)
  - Cash Management
  - Internal Controls
  - Period of Performance

# Fiscal Desk Reviews

- The desk reviews, will address:
  - Allowable Costs
  - Internal Controls Related to Allowable Costs

# Transaction Reviews

- Transaction reviews will address:
  - - The transactions will be selected randomly on a bi-annual basis to begin with and move into a quarterly basis, or more frequently, once data techniques and resources allow
    - Transactions will be reviewed for allowable costs.

*Facing Challenges...*



*...Exceeding Expectations*

North Carolina Association of Compensatory  
Educators Conference  
October 27-28, 2021



# Questions

