



Federal Programs 3 / 18 / 2021

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Mission:

To support innovative and high quality schools

We are a group of visionary choice advocates, accountants, analysts, billing-gurus, designers, forward thinkers, backwards thinkers, never-ending learners, former teachers and forever students. Most of all, we're here to help your school grow, innovate and succeed.

Independent organization serving charter schools and related entities in Pennsylvania for over 15 years.

Office located in Glenside

Advisors to boards, school leaders, and business managers

Currently serving more than 50 clients, providing:

- Full-service back office support
- Accounting and financial services
- District billing services
- Strategic planning consulting
- Compliance and reporting support
 - Including PIMS reporting
- Capital financing services
- Charter applications and renewal
- Audit preparation

About Us

Abigail Dubinchik, Director of Compliance at Charter Choices

Thank you to Division of Federal Programs for joining us today!!

Cindy Rhoads, Regional Coordinator Division of Federal Programs at PDE

Kenneth Krawchuk, Regional Coordinator Division of Federal Programs at PDE

Updates / Reminders

ENSURE COMPLIANCE OF YOUR LEA'S FEDERAL PROGRAMS

2021 Virtual Conference

PAFPC and DFP are holding the annual conference on May 4 and 5, 2021.

Counts toward monitoring risk assessment requirement to attend at least one DFP sponsored training/event per year.

Go to <https://www.pafpc.org/page/2021annualhome> to register!

Topics will include:

- ESSA program updates
- Federal Stimulus program updates
- Parent/Family engagement
- UGG/Federal programs fiscal management overview
- LEA highlight sessions

Time and Effort Requirements

Semi-Annual Certifications

- If an employee works on a single cost objective OR if an employee works on multiple cost objectives AND their schedule doesn't change
- After the fact
- Account for total activity
- Signed by employee OR supervisor
- Every six months (twice a year)

Personnel Activity Reports (PARs)

- If an employee works on multiple cost objectives AND their schedule varies week to week
- After the fact
- Account for total activity
- Signed by employee
- Prepared at least monthly and coincide with one or more pay periods

NEW! Time and Effort Procedures

LEA must have written time and effort procedures that include directions for:

- (1) Completion of time and attendance reporting
- (2) Approval process that is required
- (3) Processing of personnel charges to federal awards
- (4) Internal review process that will be established to ensure effective internal control over the federal awards

Note: If you are being monitored for the 2020-21 SY this is a requirement for 2020-21 Program/Fiscal and ESSER Monitoring. However, if you get marked as Not Met and if this is only finding for this year, you won't be monitored again next year just because of this.

If you are not being monitored you are still required to put this in place so do this as soon as possible!

DFP does have a sample template if you need an example.

Parent and Family Engagement

Conduct virtual meetings with your stakeholders! Now is the time to start planning your end of year meetings and surveys.

Many requirements should be annually reviewed with your parents/families BEFORE your next consolidated application is submitted. Monitors will want to see documentation during next year's monitoring process.

Documentation examples: agendas, sign-in sheets, any handouts, surveys and tallied results, mailing proof, etc. Try to offer meetings at flexible times for parents!

PFE requirements for next year:

- Discussion on how to spend Title I, II, III, IV funds for FY22. If receive more than \$500,000 in Title I (including transfer) make sure to ask for input on the required 1% PFE set-aside.
- Discussion on planning of Title I, II, III, IV programming for FY22.
- Annual review and update of LEA/School PFE policy, School-Parent-Student compact, equity plan, Schoolwide plan/school improvement plan, effectiveness of PFE activities, staff professional development needs

Parent and Family Engagement

Fall Title I Meeting	Spring Title I Meeting
Discussion of school's Title I, II, III, IV programs.	Discussion on how to spend Title I, II, III, IV funds, and if applicable PFE set aside monies
Distribution of LEA and School PFE policies, SW plan, School-Parent-Student compact, Student handbook, equity plan	Discussion on planning of Title I, II, III, and IV activities
Distribution of RTK letters (2 letters) – all students must receive the general parent RTK letter within the 2 weeks of start of school (need multiple methods of distribution and dated), and students in classrooms of non-ASC teachers who have been teaching for more than 4 consecutive weeks	Annual review and update of LEA and School PFE policies, School-Parent-Student compact, and equity plan (remember to put dates on documents to show proof or review along with the agenda/sign-in)
Providing training materials/information: <ul style="list-style-type: none"> • State standards, assessments, curriculum • Literacy training • Using technology • Education of copyright piracy • Other information as requested by parents and family members 	Annual review, update, and evaluation of SW/SIP plan, effectiveness of PFE activities, school needs assessment, staff professional needs
Providing documents to parents that are translated to languages specific to the school	Surveys for parent and family input!
Discussion of ways parents and family members can be involved including involvement in professional development opportunities	



Required Set-Asides

PFE: If you receive more than \$500,000 in Title I (including Transfers!), you are required to set-aside 1% of funds towards Parent and Family Engagement activities.

- Must be spent, so if you do not utilize it, school will need to request carryover at end of the grant period.
- What has been working for your LEA? How do you spend this funds?

Homeless: LEA must set aside an amount of their Title I funds towards homeless expenses.

- Does not need to necessarily be spent at the end of the grant period.
- LEA must keep the set aside available throughout grant obligation, but can reallocate towards other expenses at time of budget revision and FER.

Upcoming Deadlines

Funding Adjustments due April 16, 2021

QTR3 Cash on Hand due April 16, 2021

Other To Do's:

- If you are on the schedule for monitoring, start collecting your documentation and prepare!
- Finalize your Time and Effort procedures.
- Ensure you have up to date time and effort reporting for federally funded staff (don't forget to include personnel covered by ESSER).
- Begin ESSER II planning and applications aligning with your school's budget season!

Funding Adjustments

SUBMIT IN EGRANTS BY APRIL 16, 2021

Awards

Only Title I and II awards receive a final allocation. No adjustments for Title III and IV.

DFP has opened the funding adjustments in eGrants = if you do not see yours, reach out to your Administrative Technician.

Even if you didn't have any changes to your funds, all LEAs are required to submit a funding adjustment in eGrants. This must be submitted by April 16, 2021 otherwise LEA could receive risk assessment points.

Keep in mind:

- Last chance to Transfer Title II or IV funds to Title I.
- Be cognizant of unspent PD costs.
- If you carried over 2019-20 funds and did not include in your consolidated application, ensure that you reflect this properly in the funding adjustment!

Performance Goals

Now is the last chance for SY 2020-2021 to make any changes to your Performance Goals.

Recommend to review and consider making changes. Remember next December/January you will be required to report on the progress toward meeting your performance goals. If COVID has impacted the measurement tool, consider other activities your LEA is conducting this year.

Other tips for Performance Goals:

- Make sure your Performance Goals are measurable
- Follow the money! What do you fund under your Title I program?
- Backup documentation can be something you already have in place – you will need this later on!

EGRANTS!

At this point, your funding adjustment applications should be opened in eGrants with the final amounts. If this is not the case, contact your Administrative Technician at DFP!

As mentioned earlier, there are no adjustments to Title III and IV, however, when you are completing your funding adjustment you can make adjustments to those grants as applicable.

Consider the following:

- Each subgrant must be completed before submitting the complete Funding Adjustment application.
- All subgrant pages must be checked off before being able to submit the subgrant.
- Review all pages, however, take note of transferability, budget, performance goal, Title I selection of schools sections.

Monitoring

VIRTUAL! UTILIZE FEDMONITOR!

Overview Items

- Erin Derr will be holding monitoring office hours beginning March 3rd and will occur every other Wednesday until the end of April from 2-4 PM!
- All LEAs being monitored should have received the monitoring notification letters (with monitor name and fedmonitor access) at this point. If you have not been in touch with your monitor yet, do so as soon as possible.
- Monitoring process has not changed due to being virtual. Monitor based on a four-year cycle and subgrantee risk assessment.
- Who is being monitored:
 - 2019-20 Cycle 4 LEAs
 - 2019-20 Medium and High-Risk LEAs
 - 2020-21 Medium and High-Risk LEAs
- If you would like to find out your subgrantee risk assessment details, contact Erin Derr or your Regional Coordinator

What am I being Monitored on?

2019-20 Cycle 4 LEAs	2019-20 Medium/High Risk LEAs	2020-21 Medium/High Risk LEAs	2019-20 and 2020-21 Medium/High Risk LEAs
Documentation for 2019-20	Documentation for 2019-20	Documentation for 2020-21	Documentation for 2019-20 and 2020-21
2019-20 Program	2019-20 Program	2020-21 Program	2019-20 Program
2019-20 Fiscal	2019-20 Fiscal	2020-21 Fiscal	2019-20 Fiscal
		ESSER	2020-21 Program
			2020-21 Fiscal
			ESSER

Make sure your Fedmonitor account has all the assessments you will be monitored on!

Responsibilities and Workflow

- Complete the Assessment tool in Fedmonitor at least two weeks prior to the Virtual Monitoring Visit.
- Have documentation available in digital format on a shared drive or easily accessible location to address each of the required monitoring components.
 - **documentation can also be uploaded to Fedmonitor**
- Provide the monitor access to the shared drive to be able to review the evidence during or after the visit to facilitate the completion of the Fedmonitor report.
 - LEAs are strongly encouraged to provide monitor with link to access documentation prior to the virtual visit.
- LEA is strongly encouraged to create file folders that **align with the order of the Monitoring Tool** to facilitate the review of the documents during the Virtual Monitoring.
- LEA Staff available during the virtual visit should include, at a minimum, the federal programs coordinator, business manager and any appropriate staff that will need to be available to answer questions.
 - Should also include building principal
 - Parent interviews are optional

5. Performance Goal Reporting Verification

[UGG 200.328](#)

1. LEA has submitted the Performance Goal Output Report, for the prior year, for Title IA. **Please note: the LEA does not need to provide copies of the Consolidated Application. The monitor will view prior to monitoring. By checking this as met you are ensuring compliance with this requirement.**

More Tips

- If you decide to use another source for getting documentation to your monitor, please still remember that Fedmonitor must be completed 1-2 weeks prior to your virtual visit (typically monitors will discuss with you when!). You still need to answer all questions and mark Met, Not Met, N/A with type of evidence provided.
- Funding Adjustment does not have to be completed prior to monitoring – Monitor will look at most recently submitted.
- We do try to submit FA before monitoring – helps us with tracking of expenses and considering that QTR 3 is closing shortly with quarterly reporting due mid April.

Title IV Waivers

Normally, an LEA must conduct a Comprehensive Needs Assessment every 3 years for allocations of \$30,000 or more and must include stakeholders in the development of this assessment.

- Even if transfer some or all of Title IV into Title I, the LEA is still required to develop a Comprehensive Needs Assessment.
- Consolidated Application Requirement to include the stakeholders meeting date!

However, for monitoring for 2019-20 and 2020-21 it may look a little different:

2019-20	2020-21
LEA must have applied in eGrants for 2019-20 programs waivers (last summer)	PDE got a blanket waiver that applies to ALL LEAs
Will waive Title IV: <ul style="list-style-type: none">• Needs Assessment• Minimum Percentages – (20%, 20%, and some)• 15% limit on technology infrastructure	Waives Title IV: <ul style="list-style-type: none">• Needs Assessment• Minimum Percentages – (20%, 20%, and some)• 15% limit on technology infrastructure
If you selected the waivers and got approved, then you do not need to provide documentation for monitoring.	For monitoring 2020-21 LEA's, you do not have to provide the documentation for these 3 areas – can select N/A and write explanation.

Organization and Naming Conventions

HUGE FACTORS in how well this can go electronically!

Align ordering to monitoring instrument and name based on component and number in what you are referencing.

For example:

Component I: Appropriately State Certified



2019-2020 Assessment - Program > Title IA: Program > Component I: Appropriately State Certified

Note: you must click the Save button at the bottom of the page to save your data.

For any box that is checked under suggested evidence of implementation you MUST provide documentation. If you do not provide the appropriate checked documentation you may be found out of compliance.

The Local Education Agency (LEA) will ensure that all teachers and paraprofessionals working in a program supported with Title I funds meet applicable State certification and licensure requirements.

[Section 1111\(c\)\(6\)](#)

Requirements	Met	Not Met	N/A	Suggested Evidence of Implementation
1. Teachers and paraprofessionals working in a Title I program are appropriately state certified.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<div><input checked="" type="checkbox"/> List of staff working in the Title IA program and their certifications.</div> <div><input type="checkbox"/> Samples of valid level I or II certificated with appropriate content areas aligned with class schedules.</div> <div><input type="checkbox"/> Emergency permits unacceptable except for Charter Schools - 25% rule</div> <div><input type="checkbox"/> Report by the LEA data system on staff qualifications</div>
Desk monitoring only: Upload list of staff working in the Title IA program and their certifications.				<div>Title I Program Component I.1 a.docx </div> <div>Title I Program Component I.1 b.pdf </div>

ESSER Monitoring

EVEN IF YOU ARE NOT BEING MONITORED FOR YOUR ESSER FUNDS THIS YEAR, KEEP THE FOLLOWING IN MIND!

Prepare!!

Even if your LEA is not being monitored for ESSER this year, prepare for monitoring in the future!

If purchasing equipment and/or computing devices, be sure to keep inventory records and tracking, purchase orders and receipts, and conduct inventory reviews every two years.

Must adhere to Uniform Guidance Requirements.

Procurement Procedures

Procurement Method §200.320	Goods/Supplies	Services	Requirements
Micro-purchase (No quotes required)	Less than \$10,000 <i>Note: Must use more restrictive \$0 Federal threshold instead of no state requirements under \$11,500</i>	Less than \$10,000 <i>Note: Must use more restrictive \$0 Federal threshold instead of state exemption for services</i>	<ul style="list-style-type: none"> consider price to be reasonable distribute equitably among suppliers to the extent practical
Small Purchase Procedures (Relatively simple and informal)	\$10,000 - \$21,300 <i>Note: Must use more restrictive \$10,000 Federal threshold instead of \$21,300 state threshold</i>	\$10,000 - \$249,999 <i>Note: Must use more restrictive \$10,000 Federal threshold instead of state exemption for services</i>	<ul style="list-style-type: none"> obtain/document price or rate quotations from a reasonable number of qualified sources (at least three per 24 PS 8.807.1) written or documented quotes
Sealed Bids (Formal advertising)	\$21,300 or more <i>Note: Must use more restrictive \$21,300 state threshold instead of \$250,000 Federal threshold</i>	N/A	<ul style="list-style-type: none"> bids are publicly solicited firm fixed price contract awarded to the responsible bidder lowest in price cost or price analysis for purchases in excess of the Simplified Acquisition Threshold (\$250,000)
Competitive Proposals (Formal RFPs)	N/A	\$250,000 or more <i>Note: Must use more restrictive \$250,000 Federal threshold instead of state exemption for services</i>	<ul style="list-style-type: none"> conducted with more than one source submitting an offer price is not used as a sole selection factor fixed price or cost-reimbursement type contract is awarded cost or price analysis for purchases in excess of the Simplified Acquisition Threshold (\$250,000)
Non-competitive proposals	Appropriate only when these circumstances apply: <ul style="list-style-type: none"> Available only from a single source (sole source) Public emergency Expressly authorized by awarding or pass-through agency in response to written request from district After soliciting a number of sources, competition is deemed inadequate 		<ul style="list-style-type: none"> solicitation from only one source used only when qualifying circumstances apply fixed price or cost-reimbursement type contract is awarded



Documentation

- ESSER expenditures listing
- Time and effort documentation
- Time and effort procedures
- Inventory records for equipment (over \$5,000) and computing devices/special purpose equipment (\$300 to \$4,999). Make sure you indicate on the inventory listed that items were paid with ESSER funds.
- Procurement Procedures or Policy
- ESSER Quarterly Reporting – there has been two so far – one was due November 27, 2020 and second was due March 5, 2020 – make sure you are keeping up with these!

Any questions?!

*Please feel free to email me at
abby@charterchoices.com*

143K Rising

143K Rising provides the 143,000 charter school students and their families a platform to share their stories and contact their elected officials.

Please share this link with anyone on your team who may be able to assist with getting this information disseminated to your families.

<https://143krising.com/>



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