Federal Programs Handbook

An Overview of Grant Programs Authorized Under the Elementary and Secondary Education Act, as Amended by Every Student Succeeds Act

REVISED June 2021

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SECTION 1: ABOUT THIS HANDBOOK

The **Federal Programs Handbook** is intended to provide a general overview of the federal programs authorized under the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA). If contradictions are found between this document and the regulations and guidance outlined in the ESEA, as amended by the ESSA, regulations and guidance provided by the U.S. Department of Education (USED) take priority and authority. This handbook is subject to change at any time given updates in federal or state legislation or guidance.

PSUs are responsible for local program implementation. This resource should be used in conjunction with applicable guidance provided on USED’s website (www.ed.gov). Any questions not addressed in the handbook should be directed to an assigned North Carolina Department of Public Instruction (NCDPI) Program Administrator within the Federal Program Monitoring and Support Division.

**NOTE:** In North Carolina, public charter schools operate independently of other local school administrative units. Except where otherwise noted, in most sections of this document the term “PSU” refers to both local school administrative units, Lab schools, and public charter schools.

SECTION 2: FEDERAL PROGRAM MONITORING AND SUPPORT DIVISION

The North Carolina Department of Public Instruction (NCDPI), provides oversight to all PSUs. The Federal Program Monitoring and Support Division (FPMS) at DPI supports over $600,000,000 in federal funds provided to PSUs each year. The primary role of FPMS is to provide grants administration, program monitoring, data collection and reporting. The goal of FPMS is to facilitate the necessary technical assistance to ensure not only compliance, but quality programs for students.

**How can we help?**

The staff of the Federal Program Monitoring and Support Division provides oversight for several programs and initiatives that contribute to the success of students in North Carolina each year.

**Federal Grant Programs (authorized under the ESEA as Amended under the ESSA)** *

- Title I, Part A (Improving Basic Programs)
  - Comprehensive Support and Improvement
  - Targeted Support and Improvement
  - Innovative Partnership Grants
- Title I, Part C (Education of Migratory Children and Youth)
- Title I, Part D (Neglected, Delinquent, and At-Risk Youth)
- Title II, Part A (Supporting Effective Instruction)
- Title III, Part A (English Language Acquisition)
- Title IV, Part A (Student Support and Academic Enrichment)
- Title IV, Part B (21st Century Community Learning Centers)
- Title V, Part B, Subpart 2 (Rural Low-Income Schools)
Federal Initiatives

- Foster Care Education
- Innovative Partnership Grants (IPG)
- National ESEA Distinguished Schools Program
- Federal Teacher Loan Forgiveness Program
- Comparability Reporting
- Annual Prayer Certification
- Education Flexibility Partnership Act (Ed-Flex Authority)
- 21st CCLC Federal Data Collection System (21DC)
- Migrant Student Interstate Exchange Initiative (MSIX)
- 21 Annual Performance Report (21APR)
- Committee of Practitioners (COP)
- Section 504
- Early Childhood Program
- Parent and Family Engagement
- Private School Equitable Services

State Initiatives

- NCStar - School Improvement Planning
- Extended Learning and Integrated Student Supports Competitive Grants Program

SECTION 3: COMPREHENSIVE CONTINUOUS IMPROVEMENT PLAN

Overview

Each PSU should develop a comprehensive district plan to ensure that federal funds, used as a whole, accomplish the overall goals and objectives of the district. PSUs apply for their Federal funds through a consolidated application process to DPI. The application requires PSUs to identify the methods through which the intent and purpose(s) of each Federal program will be integrated into the PSUs’ existing academic achievement targets and efforts towards continuous improvement. Responses as to how the PSU will meet Federal program requirements, as defined in ESSA, are submitted into a consolidated application through the lens of the PSUs’ ability to use multiple federal resources to solve problems of student learning. Where unique and targeted Federal funding streams exist (e.g., homeless, migrant, and rural), PSUs must expand on the identified needs for these populations or schools within the applicable sections of a consolidated application. This may require PSUs to delve more deeply into the root causes of the academic deficiencies of schools and populations.
NOTE: *For public charter schools and Lab schools, the comprehensive plan should be developed at the school level.*

To assist PSUs with plan development, DPI utilizes a web-based planning and grants management system, the Comprehensive, Continuous Improvement Plan (CCIP). CCIP consists of a Funding Application for each Title received within the consolidated shell. The Funding application contains the needs assessment, goals, and strategies, action steps and budget amounts for all grants the PSU receives. The Funding Application(s) contain a budget, nonpublic services, and other related pages. The budget will be submitted into the pre-BAAS program by the PSU, this budget will populate into CCIP automatically.

The goals of using CCIP are to:

- Reduce the administrative burden placed on organizations (PSUs and non-PSUs) when applying for grant funding.
- Increase transparency of grant activities to ensure funds are spent in accordance with federal and state guidelines.
- Develop one project that will consolidate the planning and application process to reduce duplication of information across the state.

CCIP may be utilized to apply for federal funds as part of a Consolidated Funding Application as well as Competitive Funding Applications as follows:

- **Consolidated Funding Application**
  - Title I-A (PRC 050)
    - Comprehensive Support and Improvement (CSI-PRC 105)
  - Title I-C (PRC 051)
  - Title I-D, Subpart 1 (PRC 047)
  - Title I-D, Subpart 2 (PRC 050)
  - Title II (PRC 103)
  - Title III-Language Acquisition (PRC 104)
  - Title III-Significant Increase (PRC 111)
  - Title IV-A (PRC 108)
  - Title V – RLIS (PRC 109)

- **Competitive Funding Applications**
  - McKinney-Vento
  - 21st Century Community Learning Centers (21st CCLC)
  - Extended Learning and Integrated Student Support (ELISS)

The Division provides trainings for CCIP throughout the year. Additional information including User Guides and Frequently Asked Questions regarding CCIP are available to the public and are accessible at: CCIP Homepage. If you need assistance between the offered trainings, please contact your Regional Program Administrator contact.
General Submission Requirements

A User Access Administrator (UAA) account must be established to allow local staff to enter plan components and the funding application on CCIP. To establish a UAA account, email Anita Harris at anita.harris@dpi.nc.gov and provide the following information:

- First and Last Name
- NCID Username (not password)
- Phone number (format xxx-xxx-xxxx)

The following outlines the general sequence of steps to submit the Consolidated Funding Application through CCIP:

1. Conduct Equitable Service Consultation (February – May)
2. Submit ESSR data in Power School for Title I, Part A component. (May-July)
3. Submit required information for Comprehensive Needs Assessment and Goals and Strategies in funding application Consolidated Related Documents. (June-September)
4. Submit applicable program budgets to DPI through the Pre-Budgeting and Amendment System (BAAS) platform. The submitted budget will populate the Budget Details page in CCIP. Title I school allocations must reflect school location codes in district budget. (June-September)
5. Enter required information in each section of the Consolidated Funding Application. (June-September)
6. Ensure that all program areas in which an allotment was received have a completed funding application in CCIP. (June-September)
7. Once all errors have been cleared, submit the application through the appropriate approvals: (June-September)
   a. Draft Completed
   b. Fiscal Representative Approved
   c. Chief Administrator Approved
8. Create and submit Equity plan and Comparability Report (November-December)

Any changes to the plan during or after an approval process require the application to be resubmitted.

All Related Documents must be uploaded into the CCIP either in the Consolidated Related Documents section or the Related Documents section for each federal grant for which the PSU is eligible. Please note that some documents are required while others may be optional depending on how the PSU determines its federal funds will be used.

Assurances and Prayer Certification

Sec. 8306 of the ESEA as amended by the ESSA requires that PSUs shall have on file with the State educational agency a single set of assurances, applicable to each program for which a plan or application is
submitted. Each PSU will acknowledge general assurances addressing all federal programs and specific program assurances where an allocation is received.

In addition, Sec. 8524 of the ESEA as amended by the ESSA requires that, as a condition of receiving ESEA funds, a sub-grantee or sub-recipient must certify in writing to its state educational agency (SEA) that it has no policy that prevents, or otherwise denies, participation in constitutionally protected prayer in public schools.

The Single Set of Assurances and Prayer Certification is available in a single template in CCIP. The local Superintendent will review and complete this certification and upload the document into the Consolidated Related Documents section of CCIP.

**Stakeholder Consultation**

The Consolidated Planning Tool and Funding Application must be developed with timely and meaningful consultation with teachers, principals, other school leaders, paraprofessionals, specialized instructional support personnel, charter school leaders (in a local educational agency that has charter schools), administrators (including administrators of programs described in other programs authorized under the ESEA), other appropriate school personnel, and with parents of children in schools served under this part. The stakeholder consultation should guide the creation of the Comprehensive Needs Assessment (CNA), Goals, and Plan Relationships. In addition, plans must be developed in consultation with private school officials as required under section 1117 and 8501 of the ESEA, as amended by the ESSA. For more information on private school consultation requirements, refer to the [Private School Consultation and Equitable Services](#) section.

**NOTE:** The PSU creates a plan based on a planning allotment. This amount is not the “actual” allotment. PSUs should be aware that there may be an increase or decrease in the planning vs. actual allotments.

**Comprehensive Needs Assessment**

The consolidated plan must be developed based on a district-wide Comprehensive Needs Assessment (CNA). The CNA is a systematic analysis of data from several dimensions (i.e., student achievement, demographics, perceptions, and school processes). Based on the analysis of this data, the district must create a prioritized list of needs. The needs identified will be used to create goals the district will seek to achieve using federal funds.

This process is required for both the school and district level; however, only the district CNA is required to be included in CCIP. An optional district CNA template can be found in the document library of CCIP and is available through [NCStar](#).

**Goals and Strategies**

After the district has completed the Comprehensive Needs Assessment (CNA) and the prioritized needs, local staff will begin developing their annual goals and strategies. These goals and strategies must be directly linked to the prioritized needs of the PSU and should be measurable (SMART goals) to
demonstrate that the strategies being implemented by the district are working, not in general, but specifically in the schools within the district, and there is data to support their success.

Fiscal resources matching the goals and strategies must be checked off on the document based on the district CNA. All consolidated funding sources must be identified in the goals and strategies document. If you need assistance matching fiscal resources to goals and strategies, please contact your Regional Program Administrator.

**NOTE: Under the ESSA, there is a general transition away from “scientifically researched-based” strategies to “evidence-based” activities, strategies, and interventions (collectively referred to as “interventions”).** For more information on evidence-based interventions, see Appendix A of the Non-Regulatory Guidance for Title II, Part A.

Program Specific Worksheets

Some programs require data unique to their legislation and the Consolidated Application houses these data requirements. For example, Title I, Part A requires rank order of schools based on poverty percentages. This requirement is not required by other programs.

In addition, some programs require other data to be submitted unique to their legislation. The Consolidated Funding Application allows these data to be uploaded in the applicable program sections within CCIP. For example, Title I, Part A of the ESEA, as amended under the ESSA requires that states and school systems ensure that low-wealth, minority, learning disabled and/or English language learners are taught by effective, experienced teachers who have met all state licensing requirements to the same extent as are students who do not fall into these categories. PSUs must develop and upload into CCIP an Equity Plan that describes how the PSU will accomplish this requirement.

For program specific requirements, refer to the Appendices of this document.

Resources

- [ESSA Dear Colleague Letter on Tribal Consultation](#) (September 26, 2016)
- [Documents Library of CCIP](#)

**SECTION 4: PRIVATE SCHOOL CONSULTATION AND EQUITABLE SERVICES**

**Overview**

Section 1117 of Title I, Part A and section 8501 of Title VIII of the ESEA, as amended under the ESSA require that timely and meaningful consultation occur between the PSU and private school officials prior to any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate in federal programs. Ongoing consultation must continue throughout the implementation and assessment of activities supported with federal funds.
Consultation Requirements

In addition to the equitable services provisions under Title I, Part A contained in ESEA section 1117, several other federal programs include equitable services requirements. The equitable services requirements that apply to those programs are contained in ESEA section 8501 and include the following:

- Title I, Part C (Education of Migratory Children and Youth)
- Title II, Part A (Supporting Effective Instruction)
- Title III, Part A (English Language Acquisition)
- Title IV, Part A (Student Support and Academic Enrichment)
- Title IV, Part B (21st Century Community Learning Centers)

The following topics must be discussed during the ongoing consultation process:

- How the children’s needs will be identified
- What services will be offered
- How, where, and by whom the services will be provided
- How the services will be academically assessed and how the results of that assessment will be used to improve those services
- The size and scope of the equitable services to be provided to the eligible private school children, the proportion of funds that is allocated for such services, and how that proportion of funds is determined
- The method or sources of data that will be used to determine the number of children from low-income families in participating school attendance areas who attend private schools
- How and when the agency will make decisions about the delivery of services to such children, including a thorough consideration and analysis of the views of the private school officials on the provision of services through a contract with potential third-party providers
- How the local educational agency will provide in writing to such private school officials an analysis of the reasons why the local educational agency has chosen not to use a contractor, if the agency disagrees with the views of the private school officials on the provision of services through a contract
- Whether the agency shall provide services directly or through a separate government agency, consortium, entity, or third-party contractor
- Whether to provide equitable services to eligible private school participants by: 1) creating a pool or pools of funds with all of the funds allocated under programs covered under section 8501(b); or 2) on a school-by-school basis based on each of the proportionate share of funds available to provide services in each school
- When services will be provided, including the approximate time of day
- Whether to consolidate and use Title I funds provided in coordination with eligible funds available for services to private school children under applicable programs, as defined in section 8501(b)(1)
to provide services to eligible private school children participating in programs

Districts must complete an Affirmation of Private School Consultation form for each private school in the district. This documentation is required to be uploaded into CCIP under the Consolidated Documents section.

The district must maintain documentation demonstrating three direct notification attempts (i.e., certified-mail, school visit, email, phone call, etc.). If private school officials do not provide such affirmation within a reasonable period, the district will indicate on the Affirmation of Private School Consultation form that they have documentation of three direct notification attempts and received with no response from the private school.

Please refer to our DPI-Equitable Services website for additional and up to date information.

Equitable Services website

SECTION 5: FISCAL PROCEDURES

Overview

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

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).

Allocations for Federal Programs

The U.S. Department of Education (USED) provides official formula-based allocations to states by July 1st of each year for most federal programs. Once received by DPI, each federal program follows its specific procedures outlined in the Allotment Policy Manual (APM) to determine allocations to subgrantees in North Carolina. Policies in the APM were developed by DPI and approved by the SBE to comply with all applicable regulations for each federal program.

The School Finance Division presents these allocations to the SBE as soon as they are available, typically in July and August, for review and approval. Based on these allocations, PSUs will create budgets that will be integrated into their application for funds. Once the applications and budgets are approved in the CCIP system, each PSU will receive official grant award notices (GANs). Please note that GANs must be maintained on file at the local level for audit reviews.
To support PSUs with planning efforts before official formula-based allocations are received from USED, NCDPI will create an estimated allocation spreadsheet that includes all PSUs and programs for which preliminary estimates are feasible. These estimates are based on preliminary allocation information posted by USED during the months leading up to final allocations in July or August. PSUs are encouraged, but not required, to use these estimates. Planning allotments are uploaded into BAAS prior to the application opening in the June timeline.

**Budgets**

PSUs work with approved third-party vendors to post budgets and to account for program expenditures by object and purpose code, to electronically interface with the Budget and Amendment Approval System (BAAS), which is managed by NCDPI. The BAAS system is connected to NCDPI’s Cash Management System, which in turn, is connected to the NC Department of the State Treasurer. Transactions in BAAS generate a report which automatically feeds entries to the external General Ledger (GL) and North Carolina Accounting System (NCAS). The NCDPI Cash Management Section then draws the funds down from the State Treasurer account according to the NCAS and GL data. The PSUs accounting systems are automatically linked to BAAS to track their approved use of state and federal funds which pass through NCDPI. Budgets must be submitted to BAAS using the Uniform Chart of Accounts (COA). The submitted budget will take 24-48 hours to become visible in BAAS. Once the initial budget has been recognized by BAAS, it will populate into the budget section of CCIP.

In some districts, Title I/ Federal Program Directors enter budgets into the PSU budgeting system, while in others the budgets may be submitted by the Finance Officer or outside finance agency. It is important that program and finance staff work together to determine when budgets are submitted and the process for communicating any changes that may occur during the year.

The Division of School Business at DPI assigns all funding streams (whether federal, state, or local) to a unique Program Report Code (PRC). Federal funds must be budgeted in PRCs assigned to each program as follows:

<table>
<thead>
<tr>
<th>Program</th>
<th>Description</th>
<th>PRC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title I, Part A</td>
<td>Improving Basic Programs</td>
<td>050</td>
</tr>
<tr>
<td>Title I, Part C</td>
<td>Education of Migratory Children and Youth</td>
<td>051</td>
</tr>
<tr>
<td>Title I, Part D, Subpart 1</td>
<td>Neglected, Delinquent, and At-Risk Youth (State Agencies ONLY)</td>
<td>047</td>
</tr>
<tr>
<td>Title I, Part D, Subpart 2</td>
<td>Neglected, Delinquent, and At-Risk Youth (PSUs)</td>
<td>050</td>
</tr>
<tr>
<td>Title II, Part A</td>
<td>Supporting Effective Instruction</td>
<td>103</td>
</tr>
<tr>
<td>Title III, Part A</td>
<td>English Language Acquisition</td>
<td>104</td>
</tr>
<tr>
<td>Title III, Part A</td>
<td>Significant Increase</td>
<td>111</td>
</tr>
<tr>
<td>Title IV, Part A</td>
<td>Student Support and Academic Enrichment</td>
<td>108</td>
</tr>
<tr>
<td>Title IV, Part B</td>
<td>21st Century Community Learning Centers</td>
<td>110</td>
</tr>
</tbody>
</table>
Each PRC has a unique Chart of Accounts (COA) to document which purpose or object codes in the budget system represent allowable expenditures according to the requirements of that particular funding source. The account code structure consists of four dimensions. The dimensions and descriptions are as follows:

1) Fund Code - consists of one numeric digit. The fund is an independent fiscal accounting entity with a self-balancing set of accounts. (e.g., federal fund code is 3).

2) Purpose Code - consists of four numeric digits and describes the purpose for which the activity exists or the type of balance sheet account. (e.g., Instructional Services code is 5000).

3) Program Report Code (PRC) - consists of three numeric digits. The program report code describes the funding for each activity, classifying expenditures by program to determine cost. (e.g., PRC 110 for 21st CCLC awards; PRC 050 for Title I, Part A awards).

4) Object Code - consists of three numeric digits. The object is the service or commodity obtained as the result of a specific expenditure. (e.g., Teacher's Salary Certified/Licensed is code 121; Supplies and Materials is code 411).

Sub-recipients may request additional object and/or purpose codes for division management to consider by completing the Chart of Accounts Revision Request Form.

**NOTE: All budgets must be submitted under approved account codes in the COA.**

**Budget Amendments**

Budget amendments/revisions (changes to the budget) can be submitted anytime during the approved grant period. Budget amendment approvals are completed in BAAS. Budget amendments along with appropriate justification narrative submitted in the budgeting system will be reviewed and approved by Program Administrators, who will verify that the request meets the requirements of the grant. Please note, detailed justifications provided in budget amendments are required.

In general, federal funds may be used only to cover costs that (1) comply with the approved grant application and budget (allowable use) and (2) are reasonable and necessary for the proper and efficient
performance and administration of the grant. “A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.” (EDGAR 2 CFR Part §200.404).

Throughout the year, PSUs should submit ongoing budget amendments to ensure resources are allocated to support high student achievement. Budgets and budget amendments are processed in the order they are received by Federal Program Administrators.

If a PSU makes a substantial change in their budget, the application in CCIP must be updated to reflect the changes and submitted prior to approval. Please contact your regional Program Administrator prior to placing a change comment in CCIP.

**NOTE:** Budget amendments must be submitted periodically to ensure that no current budget exceeds more than 10% of actual expenditures.

**Time and Effort Records**

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.

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. 2 CFR 200.430i requires the following as Standards for Documentation of Personnel Expenses:

(1) Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

   (i) Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
   (ii) Be incorporated into the official records of the non-Federal entity;
(iii) Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensated activities (for IHE, this per the IHE’s definition of IBS);

(iv) Encompass federally-assisted and all other activities compensated by the non-Federal entity on an integrated basis, but may include the use of subsidiary records as defined in the non-Federal entity’s written policy;

(v) Comply with the established accounting policies and practices of the non-Federal entity (See paragraph (h)(1)(ii) above for treatment of incidental work for IHEs.); and

(vi) [Reserved]

(vii) Support the distribution of the employee’s salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.

(viii) Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes, provided that:

   (A) The system for establishing the estimates produces reasonable approximations of the activity actually performed;

   (B) Significant changes in the corresponding work activity (as defined by the non-Federal entity’s written policies) are identified and entered into the records in a timely manner. Short term (such as one or two months) fluctuation between workload categories need not be considered if the distribution of salaries and wages is reasonable over the longer term; and

   (C) The Non-Federal entity’s system of internal controls includes processes to review after-the-fact interim charges made to a Federal award based on budget estimates. All necessary adjustment must be made such that the final amount charged to the Federal award is accurate, allowable, and properly allocated.

(ix) Because practices vary as to the activity constituting a full workload (for IHEs, IBS), records may reflect categories of activities expressed as a percentage distribution of total activities.

**Time and Effort Supporting Documentation Examples (using Semi-Certifications and PARs)**

<table>
<thead>
<tr>
<th>Cost Objective</th>
<th>Criteria</th>
<th>Supporting Documentation Examples</th>
</tr>
</thead>
</table>
| Single Cost Objective| • Employee works solely on a single Federal award or cost objective.                        | • Semi-annual certification
|                      |                                                                                             | • Signed after-the-fact by the employee or a supervisory official having firsthand knowledge of the work performed by the employee. |
### Multiple Cost Objectives

- More than one Federal award;
- Federal award & non-Federal award;
- Indirect cost activity & direct cost activity;
- Two or more indirect activities that are allocated using different allocation bases; or
- Unallowable activity & a direct or indirect cost activity

### Personnel activity reports (PAR)

- Reflect an after-the-fact distribution of the actual activity of the employee;
- Account for the total activity for which each employee is compensated;
- Be prepared at least monthly & coincide with one or more pay periods; and
- Signed after-the-fact by the employee & a supervisory official having firsthand knowledge of the work performed by the employee.

### Multiple Cost Objectives with Fixed Schedule (Substitute System)

- Currently work on a schedule that includes multiple activities or cost objectives that must be supported by monthly personnel activity reports;
- Work on specific activities or cost objectives based on a predetermined schedule; and
- Not work on multiple activities or cost objectives at the exact same time on their schedule.

### Substitute System

- Indicate the specific activity or cost objective that the employee worked on for each segment of the employee’s schedule;
- Account for the total hours for which each employee is compensated during the period reflected on the employee’s schedule; and
- Be certified at least semi-annually & signed by the employee & a supervisory official having firsthand knowledge of the work performed by the employee.

### Stipend and Extra Duty Pay

- Pay for extra work beyond an employee’s regular contract

### Written Agreement

- Indicates the extra work to be performed;
- Date(s) of performance;
- Amount to be paid to the employee; and
- Signed by the employer & the employee to show the acceptance of the terms; AND
- Semi-annual Certification, PAR, or other documentation that substantiates the time worked;

### 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. Internal controls can be defined as a process, implemented by a PSU designed to provide reasonable assurance...
regarding the achievement of objectives in the following categories: effectiveness and efficiency in operations, reliability of reporting for internal and external use, and compliance with applicable laws and regulations (2 CFR §200.1). Per Government Accountability Office’s (GAO) *Standards for Internal Control in the Federal Government* (the “Green Book”), internal controls are comprised of the plans, methods, policies, and procedures used to fulfill the mission, strategic plan, goals, and objectives of the entity. Internal control serves as the first line of defense in safeguarding assets. In short, internal control helps managers achieve desired results through effective stewardship of public resources.

These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States or the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). Internal controls over the Federal award must provide reasonable assurance that the PSU is compliantly managing the Federal award. Internal controls also help reduce fraud, waste, and abuse in the use of Federal funds. PSUs must adequately safeguard all assets and assure that they are used solely for authorized purposes.

The PSU must implement internal controls to address various areas identified in the Uniform Guidance. Table 1, the required areas for which internal controls need to be implemented. While the internal controls in Table 1 do not need to be documented; addressing the topics in writing may reduce the risk of not adhering to the requirements.

**Table 1: Required Internal Controls**

<table>
<thead>
<tr>
<th>Internal Control</th>
<th>Authorizing Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accounting</td>
<td>Accounting</td>
</tr>
<tr>
<td>Records</td>
<td>Records – 2 CFR §200.302(b)(3)</td>
</tr>
<tr>
<td>Reconciliation Reporting</td>
<td>Reconciliation – 2 CFR §200.302(b)(5)</td>
</tr>
<tr>
<td></td>
<td>Reporting – 2 CFR §200.302(b)(2)</td>
</tr>
<tr>
<td>Basic Considerations</td>
<td>2 CFR§200.402-411</td>
</tr>
<tr>
<td>Contract Oversight</td>
<td>2 CFR §200.318(b)</td>
</tr>
<tr>
<td>Drawdown Procedures</td>
<td>2 CFR §200.305(b)(3)</td>
</tr>
<tr>
<td>Expenditure Authorization by Program</td>
<td>2 CFR§200.303</td>
</tr>
<tr>
<td>General Provisions for Selected Items of Cost</td>
<td>2 CFR§200.420-476</td>
</tr>
<tr>
<td>Period of Performance</td>
<td>2 CFR 200.309, 200.403(h); 34 CFR §76.707</td>
</tr>
<tr>
<td>Records Retention</td>
<td>2 CFR §200.334, 200.335; 34 CFR §81.31(c)</td>
</tr>
<tr>
<td>Source Documentation</td>
<td>2 CFR §§200.302(b)(3), 200.403(g)</td>
</tr>
<tr>
<td>Supplement Not Supplant</td>
<td>ESSA, IDEA</td>
</tr>
<tr>
<td>Suspension and Debarment</td>
<td>2 CFR §200.212, 2 CFR Part 180</td>
</tr>
</tbody>
</table>
Internal Controls & Written Policies and Procedures

As defined by the GAO, written policies and procedures are one form of internal control. Some written policies and procedures are required, see Required Internal Control and Written Policy and Procedure chart below, and others are recommended as a best practice. Some written policies and procedures are captured in PSU board policies and some are documented in the PSU’s internal written procedures.

Written policies and procedures governing the PSU implementation of federal grants should be reviewed routinely and revised as needed. If, while monitoring and audits, a revision of internal controls is required, PSUs must take prompt action.

As a best practice, written procedures for financial management should address:

- PSU accounting system(s)
- How budgets are loaded onto the system
- Process for comparing budgets to expenditures
- Process for drawing down funds
- Process and authorizations for budget revisions
- Period of performance and when obligations are made
- Process for carryover
- Process for completing reports
- Incorporation of state agency requirements, as applicable

Uniform Guidance requires written policies and procedures for some areas as noted in the table 2 below.

Table 2: Written Policy and Procedure Chart:

<table>
<thead>
<tr>
<th>Required Internal Control</th>
<th>Requirement</th>
<th>Authorizing Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash Management</td>
<td>Written Procedures that minimize the time elapsing between the transfer of funds and disbursement by the non-Federal entity, and financial management systems that meet the standards for fund control and accountability as established in 2 CFR 200.305.</td>
<td>§200.302(b)(6), §200.305</td>
</tr>
<tr>
<td>Allowability</td>
<td>Written Procedures for determining the allowability of costs in accordance with subpart E of this part and the terms and conditions of the Federal award.</td>
<td>§200.302(b)(7)</td>
</tr>
<tr>
<td>Equipment Management</td>
<td>Written Procedures for managing equipment must meet the following requirements (summarized): (1) Property records must be maintained that include a</td>
<td>§200.313(d)</td>
</tr>
<tr>
<td>Section</td>
<td>Description</td>
<td>Rule Reference</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------</td>
<td>------------------</td>
</tr>
<tr>
<td>description of the property, a serial number or other identification number, the source of funding, who holds title, the acquisition date, and cost, percentage of Federal participation in the project costs, the location, use and condition of the property, and any ultimate disposition data.</td>
<td>§200.318(c)</td>
<td></td>
</tr>
<tr>
<td>(2) A physical inventory every two years.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(3) Safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(4) Adequate maintenance procedures.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(5) Proper sales procedures, if applicable.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conflict of Interest</td>
<td>Written Standards of Conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. ... The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions.</td>
<td>§200.318(c)</td>
</tr>
<tr>
<td>Procurement (Specific levels described in §200.67, §200.88, §200.320 – subject to change.)</td>
<td>Written Procedures for procurement transactions. These procedures must ensure that all solicitations: (1) Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition.... (2) Identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.</td>
<td>§200.319(d)</td>
</tr>
<tr>
<td>Procurement: Competitive Proposals</td>
<td>Written Method for conducting technical evaluations of the proposals received and making selections.</td>
<td>§200.320(e)(2)(ii)</td>
</tr>
<tr>
<td>Compensation–Personal Services (Time and Effort, Stipends, Bonuses etc.)</td>
<td>Written Policy to address whether compensation and allowability of costs of compensation are allowable including procedures to determine if the cost is reasonable for the services rendered and conforms to the established written policy of the non-Federal entity. Policy must be consistently applied to both Federal and non-Federal activities.</td>
<td>§200.430(a)(1)</td>
</tr>
</tbody>
</table>
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.

Procurement Requirements Using Federal Funds for Services and Goods*

<table>
<thead>
<tr>
<th>Procurement Method</th>
<th>Goods</th>
<th>Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Micro-Purchase - No required quotes;</td>
<td>$10,000 or less</td>
<td>$10,000 or less</td>
</tr>
<tr>
<td>however, must consider price as</td>
<td>Must use more restrictive</td>
<td></td>
</tr>
<tr>
<td>reasonable, and, to the extent</td>
<td>$10,000 federal threshold</td>
<td></td>
</tr>
<tr>
<td>practical, distribute equitably among</td>
<td>unless PSU self-certifies a</td>
<td></td>
</tr>
<tr>
<td>suppliers</td>
<td>higher micro-threshold. See</td>
<td></td>
</tr>
<tr>
<td></td>
<td>self-certification section</td>
<td></td>
</tr>
<tr>
<td></td>
<td>below.</td>
<td></td>
</tr>
<tr>
<td>Small Purchase Procedures</td>
<td>$10,000.01 - $90,000</td>
<td>$10,000.01 - $250,000</td>
</tr>
<tr>
<td>(Informal) – Obtain/document quotes</td>
<td>Must use more restrictive</td>
<td>State does not have competitive bidding</td>
</tr>
<tr>
<td>from a reasonable number of qualified</td>
<td>$90,000 state threshold instead of</td>
<td>requirements for service contracts. PSUs</td>
</tr>
<tr>
<td>sources (at PSUs three)</td>
<td>$250,000 federal threshold,</td>
<td>utilize UG process (or local if more</td>
</tr>
<tr>
<td></td>
<td>for LEA’s, LAB, ISD, regional schools. Charter Schools are not subject to State procurement laws.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>for LEA’s, LAB, ISD, regional schools. Charter Schools are not subject to State procurement laws.</td>
<td></td>
</tr>
<tr>
<td>Sealed Bids / Competitive Bids (Formal)</td>
<td>$90,000.01 or more</td>
<td>$250,000 or more</td>
</tr>
<tr>
<td></td>
<td>Must use more restrictive</td>
<td>Service contracts subject to state</td>
</tr>
<tr>
<td></td>
<td>$90,000 state threshold instead of</td>
<td>competitive bidding requirements. PSUs must</td>
</tr>
<tr>
<td></td>
<td>$250,000 federal threshold</td>
<td>utilize UG process (or local if more</td>
</tr>
<tr>
<td></td>
<td></td>
<td>restrictive)</td>
</tr>
</tbody>
</table>
Self-Certification Option for Higher Micro-Purchase Threshold

The updates to the Uniform Guidance did not change the micro-purchase threshold; the current micro-purchase threshold remains $10,000. A subrecipient does not need to solicit competitive price or rate quotations when awarding a micro-purchase if it considers the price to be “reasonable based on research, experience, purchase history or other information and documents it files accordingly”.

However, 2 CFR 200.320 provides PSUs with the ability to raise, via annual self-certification, the micro-purchase threshold to a “higher threshold consistent with State, local, tribal laws and regulations” and which cannot exceed $50,000. State and local procurement laws must be addressed in any higher threshold that is established. (2 CFR 300.17 and 2 CFR 300.18) PSUs are subject to different procurement requirements and the thresholds allowed will be different.

PSUs are subject to North Carolina procurement laws, under the new Uniform Guidance requirements, a PSU that completes the annual self-certification may raise the micro-purchase threshold of $10,000 via annual self-certification up to the North Carolina State threshold of $30,000 for the purchase of “goods” or the purchase of “construction or repair work”, and to $50,000 for service contracts other than those subject to the Mini-Brooks Act. Local and tribal procurement laws may be more restrictive and must be addressed in certifying a higher threshold.

Charter Schools are not subject to North Carolina procurement laws. Under the new Uniform Guidance requirements, a Charter School that completes the annual self-certification may raise the micro-purchase threshold of $10,000 via annual self-certification up to the $50,000 threshold. Local procurement laws may be more restrictive and must be addressed in certifying a higher threshold.

A PSU must maintain documentation supporting the self-certification of a higher micro-purchase threshold and must make such documentation available to a Federal awarding agency or auditor upon request in accordance with 2 C.F.R. 200.334. When self-certifying a higher micro-purchase threshold, a

PSU self-certification must include:

1. a justification for the threshold;
2. a clear identification of the threshold amount; and
3. supporting documentation of any of the following:

*Table was developed by the UNC School of Government.*
• a qualification as a low-risk auditee, in accordance with the criteria in § 200.520 for the most recent audit;
• an annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or
• for public institutions, a higher threshold consistent with State law.

The self-certified micro purchase threshold only applies to federal awards received after November 12, 2020, the effective date of the Uniform Guidance revisions.

Under the Uniform Guidance, NCDPI does not need to approve a PSU’s self-certification to a higher micro-threshold. However, to ensure that NCDPI can effectively monitor compliance with procurement requirements during standard fiscal monitoring activities, NCDPI plans to establish a process for PSUs to provide formal notice to NCDPI of approved increases in their micro-purchase threshold. Additional information may be required to substantiate compliance with the self-certification process during normal monitoring activities.

To ensure smooth implementation of these new requirements, NCDPI recommends following:

1. The self-certification should be approved by the PSU’s Board. UNC SOG recently suggested a resolution process to self-certify.
2. Self-certification procedures should be clearly documented.
3. Responsibility for implementing the annual self-certification procedures should be clearly assigned.
4. If a PSU does not qualify as a low-risk auditee, the PSU should be sure to address all elements of the required risk assessment, which should result in a systematic way of identifying, mitigating, and managing financial risks.

If you have any questions about the updates to the Uniform Guidance micro-purchase requirements, please send an email to Shirley.McFadden@dpi.nc.gov.

**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 tydings 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
Suspension and Debarment

Applicants should exercise caution in selecting subcontractors to implement program components. Subgrantees may not contract with any party which is debarred, suspended, excluded from or ineligible for participation in federal programs under EDGAR 2 CFR Part §200.213, “Debarment and Suspension.” Non-federal entities are subject to the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR part 180.

- These regulations restrict awards, sub-awards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities
- CFR §180.220 Procurement contracts included as covered transactions:
  - Any contract or subcontract expected to equal or exceed $25,000 must be checked against the System for Award Management (SAM) for suspension or debarment (including contracted tutors)
  - Evidence of the verification can be in the form of a date/time stamped print screen or other digital method that is readily available

North Carolina also has a debarred list. These files contain a list of vendors debarred from doing business with the State of North Carolina, including their location, date of debarment, and reason for debarment. NC Debarred Vendors

Resources

- System for Award Management (SAM)
- NC Debarred Vendors
- Code of Federal Regulations
- Education Department General Administrative Regulations
- Allowable Costs Under Federal Grants Checklist

Fiscal Monitoring Reviews

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 risk factors include each of the following performance factors and rated as low, medium, or high risk in the order as listed in the descriptions:

<table>
<thead>
<tr>
<th>Risk Assessment Factor</th>
<th>Descriptions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior Monitoring Findings</td>
<td>• Review performed with no deficiencies</td>
</tr>
<tr>
<td></td>
<td>• Minor deficiencies/No review performed</td>
</tr>
</tbody>
</table>
### Additional Factors

- Significant deficiencies
- No findings noted/Minor deficiencies
- Multiple findings noted
- Significant findings

<table>
<thead>
<tr>
<th>Quality of Annual Financial Reporting</th>
<th>Staffing</th>
<th>Years Since Last Monitoring Visit</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Significant deficiencies</td>
<td>• No changes</td>
<td>• One to two years</td>
</tr>
<tr>
<td>• No findings noted/Minor deficiencies</td>
<td>• Minor staff changes</td>
<td>• Three years</td>
</tr>
<tr>
<td>• Multiple findings noted</td>
<td>• Significant staff changes</td>
<td>• Four or more</td>
</tr>
</tbody>
</table>

Additional factors are also considered, such as reports of mismanagement or fraud, review of audit reports, implementation of new systems such as new accounting or payroll systems, etc.

Based on the results of the risk assessment, Fiscal Monitors select a subset of the PSUs from the list identified for program monitoring to perform on-site monitoring reviews. MAC will also conduct desk and transaction 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

The desk reviews, will address:

- Allowable Costs
- Internal Controls Related to Allowable Costs

Transaction reviews:

- 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.

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.
SECTION 6: DATA COLLECTION AND REPORTING

Districts are required to collect and submit data each year related to the outcomes achieved through federal programs. Timely and accurate data collection and submission is critical for improved educational planning, policymaking, management, and program outcomes.

**PowerSchool-Federal Data Collection**— PowerSchool collects data for federal programs under the Federal Program Monitoring section.

**How to register for the Federal data collection modules**— Access to the Federal data collections within PowerSchool is managed by the PSU Power School Administrator. Please contact the PowerSchool administrator in your PSU to request access.

**Federal Program Monitoring Data Collection Schedule**— Terminology used in schedule:

- **USED** = US Department of Education
- **CEDARS** = Common Education Data Analysis and Reporting System, NC's PreK-13 State Longitudinal Data System. The system is composed of various DPI source data collection systems, a student and staff identification system, a centralized data repository, and associated reporting and analysis (i.e., business intelligence) tools.

**PowerSchool-Eligible Schools Summary Report (ESSR)**— PowerSchool-ESSR system collects Title I School eligibility and program model information to determine poverty percentage. The school data is also used for the Title I grant application in the Federal Program Monitoring and Support Division (FPMS) grants management system, CCIP. **ALL** PSUs, both those that receive Title I funds and those that do not receive Title I funds, must report ESSR data through this PowerSchool module. In PowerSchool menu, found under Federal-Title I.

[essr.pdf](#)

**PowerSchool-Targeted Assistance Schools (TAS)**— PowerSchool-TAS system collects information on students who are eligible and those who receive services under TAS. All PSUs and charter schools with Title I Schools implementing a TAS program must report TAS data through this PowerSchool module. In PowerSchool menu, found under Federal-Title I.

[tas.pdf](#)

**PowerSchool-Student Participation**— PowerSchool-Student Participation collects count by grade level of children served with Title I Part A funds in private schools, neglected, and delinquent facilities during the school year. It includes October headcount. In PowerSchool menu, found under Federal-Title I.

[PowerSchool (SIS)](#)

**PowerSchool-Homeless**— PowerSchool-Homeless collects information on homeless students and services provided by PSUs. All PSUs and charter schools must report Homeless data through this module, even if there are no homeless children to report. In PowerSchool menu, found under Federal-Title X.
SECTION 7: MONITORING

Overview

DPI is required by federal statutes to maintain oversight regarding the use of federal funds. DPI must ensure that districts and schools use federal funds to implement programs and activities that continuously improve in quality from year to year and that address the needs of the students served in these programs. Throughout the school year, districts and schools must maintain appropriate electronic documentation to support compliance with applicable federal program requirements. Compliance is the first step toward program quality; monitoring is the springboard to providing technical assistance.

Why do we monitor?

1. **Building Relationships** – We’re in this together.
   The North Carolina Department of Public Instruction’s main objective is to raise student achievement for North Carolina’s public-school children. Through cooperative assessment of the federal programs between the State and PSUs, the quality of services to students will be strengthened and improved.

2. **Technical Assistance** – We’re here to help.
   State monitoring team members provide technical assistance during review visits and throughout the year. It is not the State's intent to dictate how the PSU will run its Title programs, but rather to answer questions, facilitate dialogue, and exchange ideas and information for program improvement while, at the same time, meeting all federal requirements.

3. **Compliance** – It’s the law.
   Monitoring federal programs helps ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education. Compliance monitoring is intended to be a collaborative partnership between the State and PSUs to ensure compliance with the ESEA as amended by the ESSA.

Program Monitoring Reviews

Each PSU will be monitored by DPI at least once every four years. A PSU will receive at least a thirty-day notice prior to being monitored by DPI. Information regarding monitoring including monitoring schedule, monitoring instrument, and other resources can be found on the Federal Program and Monitoring support website.

The Federal Program Administrators at NCDPI conducts a risk assessment analysis to determine when a monitoring will be conduct for each program.

Risk Assessment Factor Description Weighting

<table>
<thead>
<tr>
<th>Risk Factor</th>
<th>Description</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title I Allocation</td>
<td>What is the amount of Title I funds received?</td>
<td>10%</td>
</tr>
<tr>
<td>Prior Monitoring</td>
<td>How many years since the last review?</td>
<td>15%</td>
</tr>
<tr>
<td>Programmatic Findings</td>
<td>What were the results of the last review?</td>
<td>20%</td>
</tr>
<tr>
<td>Number of Federal Funds</td>
<td>How many federal grants are received?</td>
<td>10%</td>
</tr>
<tr>
<td>-------------------------</td>
<td>--------------------------------------</td>
<td>-----</td>
</tr>
<tr>
<td>Federal Program Director/School Leader</td>
<td>How many years has the Federal Programs Director/School Leader been employed by PSU?</td>
<td>15%</td>
</tr>
<tr>
<td>Chief Financial Officer/Outside Agency</td>
<td>How many years has the CFO/Outside Agency been employed by the PSU?</td>
<td>10%</td>
</tr>
<tr>
<td>Low-Performing Schools</td>
<td>What percent of schools are CSI, TSI, &amp;IPG</td>
<td>20%</td>
</tr>
</tbody>
</table>

PSUs are ranked from most risk to least risk. PSUs and charters are scheduled for monitoring by rank order within each of the eight State Board of Education districts by the Division Leadership.

The Cross-Program Consolidated Monitoring Instrument reviews all ESSA formula-funded programs using elements for PSUs.

Each Element is marked with ratings as described in the following Rating Rubric:

<table>
<thead>
<tr>
<th>Rating Rubric</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Meets Requirements</strong></td>
</tr>
<tr>
<td>Compliance Element is 100% met and supported by all required evidence.</td>
</tr>
<tr>
<td>All required documents are provided and support compliance.</td>
</tr>
<tr>
<td>Interviews support processes, documentation, and implementation.</td>
</tr>
<tr>
<td>Compliance is consistent at district and schools sampled.</td>
</tr>
</tbody>
</table>

It is the goal of the Division to send the final draft of the monitoring report to the sub-grantee within thirty (30) business days of the monitoring visit. DPI requires PSUs to provide written responses to any elements marked as “Findings” within thirty business days. All findings must be cleared before funding for the next fiscal year can be approved. DPI does not require the PSUs to provide a written response for any indicator marked “Meets Requirements with Recommendations.” While compliance requirements
have been met, the report provides recommendations to increase program effectiveness. If all elements are marked as “Meets Requirements,” then no response from the PSU is required. Monitoring reports must be maintained on file at the local level for future audits and monitoring reviews.

SECTION 8: TECHNICAL ASSISTANCE AND SUPPORT

The following table provides a *sample* calendar of technical assistance and support activities provided by DPI each year. The schedule of activities for any given year are based on local needs and the availability of state resources. Please note that the annual conference and spring institute are offered in collaboration with the North Carolina Association of Compensatory Educators (NCACE).

<table>
<thead>
<tr>
<th>June</th>
<th>November</th>
</tr>
</thead>
<tbody>
<tr>
<td>CCIP Opens</td>
<td>Submit Comparability by December 1st</td>
</tr>
<tr>
<td>Update District PFE Policy</td>
<td>N or D Headcount-PowerSchool</td>
</tr>
<tr>
<td>Update School Level PFE Policies</td>
<td>Ensure Parent Compacts have been reviewed, signed, and collected</td>
</tr>
<tr>
<td>Update School Level Parent &amp; Family Compact</td>
<td>Ensure dissemination of LEA PFE policy and School PFE plans.</td>
</tr>
<tr>
<td>Complete Consolidated Application in CCIP</td>
<td>Distribute District and School Report Cards (NCDPI provided)</td>
</tr>
<tr>
<td>Complete Corresponding Consolidated Budgets in BAAS</td>
<td>All established PSUs must have submitted their initial application or funds are deemed waived</td>
</tr>
<tr>
<td>N or D Annual Collection-PowerSchool submitted by June 30th</td>
<td>CCIP Opens for CSI</td>
</tr>
<tr>
<td>CCIP Opens 1st of June</td>
<td></td>
</tr>
<tr>
<td>TAS schools begin to identify students to be served</td>
<td></td>
</tr>
<tr>
<td>Spring Submission of NC Star Comprehensive Plan Report (CSI and TSI schools)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>July</th>
<th>December</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carryover Budgets Due (PRC 105, 115, 163, 164, 168, 169, 170)</td>
<td>Submit Comparability by December 1st</td>
</tr>
<tr>
<td>15% Carryover Limit Preliminary List (Title I only)</td>
<td>Monitor implementation of Parent and Family Engagement Plans</td>
</tr>
<tr>
<td>Semi-Annual Certifications</td>
<td>Submit N or D Headcount</td>
</tr>
<tr>
<td>Complete Consolidated Application in CCIP</td>
<td>CCIP Open for CSI</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>November</th>
<th>December</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submit Comparability by December 1st</td>
<td>Submit Comparability by December 1st</td>
</tr>
<tr>
<td>N or D Headcount-PowerSchool</td>
<td>Monitor implementation of Parent and Family Engagement Plans</td>
</tr>
<tr>
<td>Ensure Parent Compacts have been reviewed, signed, and collected</td>
<td>Submit N or D Headcount</td>
</tr>
<tr>
<td>Ensure dissemination of LEA PFE policy and School PFE plans.</td>
<td>CCIP Open for CSI</td>
</tr>
<tr>
<td>Distribute District and School Report Cards (NCDPI provided)</td>
<td></td>
</tr>
<tr>
<td>August</td>
<td>January</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Complete Corresponding Consolidated Budgets in BAAS</td>
<td>January</td>
</tr>
<tr>
<td>ESSR - if new schools or new grade configuration</td>
<td>Collect Semi-Annual Certifications for Title I personnel</td>
</tr>
<tr>
<td>CCIP Remains Open</td>
<td>Establish a plan and timeline for working with other federal programs in the district to coordinate the consolidated application in the next year.</td>
</tr>
<tr>
<td>TAS schools continue to identify students to be served</td>
<td>CCIP Opens for CSI*</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>August</strong></td>
<td><strong>January</strong></td>
</tr>
<tr>
<td>Submit Consolidated Application in CCIP, if not previously done</td>
<td>Collect Semi-Annual Certifications for Title I personnel</td>
</tr>
<tr>
<td>Submit Corresponding Consolidated Budgets in BAAS, if not previously done</td>
<td>Establish a plan and timeline for working with other federal programs in the district to coordinate the consolidated application in the next year.</td>
</tr>
<tr>
<td>Update Parent/Guardian Notification Letters for Right to Know, Testing, TSI/CSI status</td>
<td>CCIP Opens for CSI*</td>
</tr>
<tr>
<td>School Level Title I Stakeholder Meetings</td>
<td></td>
</tr>
<tr>
<td>Review/Revise PFE Policies in consultation w/parents- Should this include the School-Parent Compact as well?</td>
<td></td>
</tr>
<tr>
<td>Develop a system to collect and organize documentation related to the State Monitoring Review</td>
<td></td>
</tr>
<tr>
<td>Discuss w/ District Staff Comparability Requirements to adjust prior to October</td>
<td></td>
</tr>
<tr>
<td>CCIP Final Deadline August 31, 2021</td>
<td></td>
</tr>
<tr>
<td>TAS schools send notification letter to parents advising them that their child has been identified for Title I services (notification letter, permission-to-serve form, denial-of-services form)</td>
<td></td>
</tr>
<tr>
<td><strong>September</strong></td>
<td><strong>February</strong></td>
</tr>
<tr>
<td>---------------</td>
<td>-------------</td>
</tr>
<tr>
<td>Waiver Requests</td>
<td>Equitable Services Consultations</td>
</tr>
<tr>
<td>School Level Title I Stakeholder Meetings</td>
<td>Coordinate with early childhood programs to plan transition of preschool students</td>
</tr>
<tr>
<td>Collect School Documentation (invitations, sign-in sheets, presentations etc.) of annual parent meetings by the end of September</td>
<td>All New PSUs must have submitted an initial grant application, or it is deemed they are waiving funds</td>
</tr>
<tr>
<td>Review and Update Title I Personnel Lists by school</td>
<td>CSI Grant Due in CCIP</td>
</tr>
<tr>
<td>Collect Principal Attestation Statements</td>
<td></td>
</tr>
<tr>
<td>Review and Update Parent/Guardian Notification of Parent’s Right to Know to be sent by the end of October</td>
<td></td>
</tr>
<tr>
<td>Identify Data Collection Method for Comparability Calculations</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>October</strong></th>
<th><strong>March</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>N or D Headcount-PowerSchool</td>
<td>Equitable Services Consultations</td>
</tr>
<tr>
<td>Submit Student Participation headcount through PowerSchool</td>
<td>District/School Level Allocation/Budget Discussions</td>
</tr>
<tr>
<td>Review/Design evaluations for Title I funded PFE planes and Professional Development Activities for impact on Student Achievement.</td>
<td>Gather F/R and/or CEP data for ESSR report</td>
</tr>
<tr>
<td>Calculate Comparability based on October data</td>
<td></td>
</tr>
<tr>
<td>Review and Update Needs Assessment</td>
<td></td>
</tr>
<tr>
<td>Fall Submission of NCStar Comprehensive Plan Report (Required of Low-Performing and CSI/TSI)</td>
<td></td>
</tr>
</tbody>
</table>
NCFEPA Conference (NC Association of Federal Education Program Administrators)

<table>
<thead>
<tr>
<th>April</th>
<th>May</th>
</tr>
</thead>
<tbody>
<tr>
<td>Equitable Services Consultations</td>
<td>ESSR Completion-PowerSchool</td>
</tr>
<tr>
<td>Direct Certification Data Collected April 1</td>
<td>N or D Annual Collection-PowerSchool</td>
</tr>
<tr>
<td>ESSR Completion-PowerSchool</td>
<td></td>
</tr>
<tr>
<td>Review Homeless &amp; Foster Care Use of Funds w/ POC for # of students and amount of reservation in Title I</td>
<td>Complete CNAs</td>
</tr>
<tr>
<td>Submit NCStar CNA</td>
<td>District/School Level Title I plan discussions</td>
</tr>
<tr>
<td>Consult and Coordinate with Early Childhood/Pre-K staff to update MOU</td>
<td>Stakeholder Consultations</td>
</tr>
<tr>
<td>Stakeholder Consultations</td>
<td>Regional Meetings</td>
</tr>
</tbody>
</table>

**Contact Information**

The Division routinely utilizes listserv messages to ensure that local staff have up-to-date information as quickly as possible. Make sure your contact information is provided to your Regional Program Administrator and to the Division’s Administrative Secretary, Richard Trantham at Richard.trantham@dpi.nc.gov to receive updates and other information throughout the year.

Section 9: APPENDICES

**APPENDIX 1: GLOSSARY OF GENERAL TERMS AND ACRONYMS**

<table>
<thead>
<tr>
<th>125% RULE</th>
<th>125% RULE</th>
</tr>
</thead>
<tbody>
<tr>
<td>A school or school attendance area whose student population is below 35% poverty may still be eligible for Title I funds. If using this rule, the PSU divides its total allocation per low-income child by the number of low-income children in the school district/charter. Then multiply this per-child amount by 125%. When applying this rule, the PSU completes this calculation before reserving any funds (See Set-Asides).</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>35% RULE</th>
<th>35% RULE</th>
</tr>
</thead>
<tbody>
<tr>
<td>A school or school attendance area whose student population is at least 35% poverty is eligible for Title I funds. Schools must be served in rank order.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>75% RULE</th>
<th>75% RULE</th>
</tr>
</thead>
<tbody>
<tr>
<td>A school or school attendance area whose student population is at or above 75% poverty must be served in rank-order first when building eligibility of per-child amount allocations.</td>
<td></td>
</tr>
<tr>
<td><strong>ALLOTMENT</strong></td>
<td>An Allotment is the amount of state or federal funds allocated by the State to PSUs to spend on specific grant program activities. To lawfully spend money in a program report code (PRC) a PSU must have an allotment from DPI which has been approved through an application process. For federal funds, a cash request cannot be submitted unless an approved allotment is available.</td>
</tr>
<tr>
<td><strong>AT RISK</strong></td>
<td>At risk students are those students that are failing or at risk of failing to meet state academic standards.</td>
</tr>
<tr>
<td><strong>BAAS</strong></td>
<td>BAAS is the Budget and Amendment Approval System (BAAS) at DPI. All PSUs and public charter schools must submit budgets and amendments for federal funds through BAAS for approval by appropriate DPI program staff. <a href="https://schools.nc.gov/baas">https://schools.nc.gov/baas</a></td>
</tr>
<tr>
<td><strong>BUDGET</strong></td>
<td>The budget provides details of the intended use of funds. The budget must be developed to apply for federal funds and must use appropriate account codes for each federal grant.</td>
</tr>
<tr>
<td><strong>CARRYOVER</strong></td>
<td>Under the equitable services provision of the Title I statutes, the Title I program for private school participants must begin at the same time as the Title I program for public school participants. The PSU must carry over any unspent funds that should have been used to provide equitable services for private school students and add them to the proportional share of funds for the private school participants for the next school year. However, it is the intent to expend current year funds on current year students.</td>
</tr>
<tr>
<td><strong>CEP</strong></td>
<td>Section 104(a) of the Healthy, Hunger Free Kids Act of 2010 amended the National School Lunch Act to provide an alternative to household eligibility applications for free and reduced-price meals in high poverty PSUs and schools. This alternative is referred to as the Community Eligibility Provision (CEP). The overall purpose of the CEP is to improve access to nutritious meals for students in high poverty areas by providing meals to all students “at no cost” to the students. <a href="https://childnutrition.ncpublicschools.gov/information-resources/eligibility/community-eligibility-provision-cep">https://childnutrition.ncpublicschools.gov/information-resources/eligibility/community-eligibility-provision-cep</a></td>
</tr>
<tr>
<td><strong>CCIP</strong></td>
<td>The Comprehensive Continuous Improvement Planning tool is a web-based tool that is used to apply for federal grants. <a href="https://ccip.schools.nc.gov">https://ccip.schools.nc.gov</a></td>
</tr>
<tr>
<td><strong>CCIP – Fiscal Representative</strong></td>
<td>Allows the user to mark an application Fiscal Representative Approved and inherits all permissions from the Data Entry role.</td>
</tr>
<tr>
<td><strong>CCIP – Chief Administrator</strong></td>
<td>Allows the user to mark an application Chief Administrator Approved and inherits all permissions from the Data Entry role.</td>
</tr>
<tr>
<td><strong>CCIP – UAA</strong></td>
<td>The User Access Administrator role is established for grants included in CCIP. The role allows one to create, update, and delete users/roles for an organization. This role does NOT give the user any access to edit the Funding Application or Planning Tool.</td>
</tr>
</tbody>
</table>
### CNA
Comprehensive Needs Assessment

The Comprehensive Needs Assessment (CNA) provides a framework which:

- provides districts and schools with a clear view of their strengths, areas for improvement, challenges, and successes;
- enables a systematic review of practices, processes, and systems within a school district;
- assists district and school leadership in determining needs, examining their nature and causes, and setting priorities for future action;
- guides the development of a meaningful district or school plan and suggests benchmarks for evaluation; and
- most importantly, it is a cornerstone of continuous improvement, ensuring the best possible outcomes for all students.


### CSI
Comprehensive Support and Improvement

North Carolina must identify schools for comprehensive support and improvement as defined in the ESSA state plan. Listed below are the three categories of identification:

- CSI–Lowest Performing Schools (CSI-LP)
- CSI–Low Graduation Rates (CSI-LG)
- CSI–Additional Targeted Support Not Exiting Such Status (CSI-AT)

For the 2018–19 identification year, only CSI-LP and CSI-LG schools are identified. CSI-AT schools will first be identified in the 2021–22 school year.

[https://www.dpi.nc.gov/media/4612/download](https://www.dpi.nc.gov/media/4612/download)
[https://www.dpi.nc.gov/media/6940/download](https://www.dpi.nc.gov/media/6940/download)

### EDDIE
The Educational Directory and Demographical Information Exchange system contains school district and school information such as PSU numbers, school numbers, administrative contacts, school types, grade levels, calendar types, program types, addresses, and more.


### ELISS
Extended Learning and Integrated Student Support Competitive Grant

| **ESSA** | Every Student Succeeds Act  
https://www.ed.gov/essa?src=rn |
| **ESSR** | The Eligible Schools Summary Report lists the poverty percentages for all schools in a district. Read-only data from ESSR is viewed on the Building Eligibility page in the Title I application.  
https://www.dpi.nc.gov/media/4525/download |
| **ESSER** | Elementary and Secondary Schools Emergency Relief Funds  
| **FEDERAL FUNDS** | Funding sources which come from the federal government are established through PRCs as a separate funding source. Transactions for these funds are always posted to the current fiscal year, as the federal funds have no prior year reporting. |
| **FY** | The state Fiscal Year (FY) is the period between July 1 and June 30 of any given year. |
| **GRADE SPAN** | When an PSU opts to serve schools below 75% poverty, the PSU may choose to serve grade spans (K-5, 6-8, 9-12), if the grade span is served in rank order. |
| **Grandfather** | The percentage of poverty at each school is calculated based on the ESSR submitted through PowerSchool. School poverty percentages can change from year to year. If the fluctuation of poverty percentage causes a school not to qualify to receive Title I funds, the Grandfather Clause allows the school to operate the same program (TAS/SW) it operated the previous year. The Grandfather Clause is only applicable for one year. |
| **IPG** | Innovative Partnership Grant  
The purpose of the IPG is to carry out the State Educational Agency’s statewide system of technical assistance and support for Entities which have schools identified as schools in need of Comprehensive Support and Improvement (CSI) under the State’s federally approved plan for The Every Student Succeeds Act (ESSA). This competition provides additional fiscal resources, technical support, and regular school visits to improve student achievement and ultimately to assist these schools with exiting the federal identification and status of CSI. |
<p>| <strong>MEP</strong> | The Migrant Education Program provides funds to help migrant students and youth meet high academic challenges by overcoming the obstacles created by frequent moves, educational disruption, cultural and language differences, and health-related problems. <a href="https://www.dpi.nc.gov/districts-schools/federal-program-monitoring/migrant-education">https://www.dpi.nc.gov/districts-schools/federal-program-monitoring/migrant-education</a> |
| <strong>NCStar</strong> | NCStar is a tool provided free of charge to schools to use for continuous school improvement. To use this tool, training is required. <a href="https://www.indistar.org">https://www.indistar.org</a> |
| <strong>Object Code</strong> | Object means the service or commodity obtained as a result of a specific expenditure. Seven major object categories are used in our Chart of Accounts: <a href="https://www.dpi.nc.gov/districts-schools/district-operations/financial-and-business-services/school-district-finance-operations/chart-accounts#supporting-documents-fy-2020-2021">https://www.dpi.nc.gov/districts-schools/district-operations/financial-and-business-services/school-district-finance-operations/chart-accounts#supporting-documents-fy-2020-2021</a> |
| <strong>POVERTY BAND</strong> | Districts may develop Poverty Bands to provide differentiated per pupil allotments when serving schools in rank order by poverty percentage. Ranking of schools or attendance areas must be based on the greatest to lowest percentage of children from low-income families attending the school. |
| <strong>POWERSCHOOL</strong> | PowerSchool collects data for federal programs under the Federal Program section. Subcomponents include data collection such as the Eligible Schools Summary Report (ESSR), Targeted Assistance Students, and Homeless Students. <a href="https://www.dpi.nc.gov/educators/home-base/powerschool-sis">https://www.dpi.nc.gov/educators/home-base/powerschool-sis</a> |
| <strong>PPA</strong> | The Per Pupil Amount of Title I funds determines the funds generated by a school based on the number of low-income children. |
| <strong>PRAYER CERTIFICATION ASSURANCES</strong> | Section 8524(b) of ESSA requires that, as a condition of receiving funding under this act, each PSU must provide written certification annually that the PSU does not have a policy that prevents or otherwise denies participation in constitutionally protected prayer in public elementary and secondary schools. |</p>
<table>
<thead>
<tr>
<th><strong>PRC</strong></th>
<th>A Program Report Code is the number assigned to a source of funding, if that funding is to be distributed to the PSUs via the allotment system for state and federal funds.</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSU</td>
<td>Public School Unit - Defined as a district, charter, or lab school.</td>
</tr>
<tr>
<td>Purpose Code</td>
<td>Purpose means the reason for which something exists or is used. Purpose includes the activities or actions that are performed to accomplish the objectives or a local school administrative unit. For budgeting and accounting purposes, expenditures of a local school administrative unit are classified into five purpose as follows: <a href="https://www.dpi.nc.gov/districts-schools/district-operations/financial-and-business-services/school-district-finance-operations/chart-accounts#supporting-documents-fy-2020-2021">https://www.dpi.nc.gov/districts-schools/district-operations/financial-and-business-services/school-district-finance-operations/chart-accounts#supporting-documents-fy-2020-2021</a> 5000 - Instructional Services 6000 - System-wide Support Services 7000- Non-Programmed Charges 8000 - Non-programmed Charges 9000 - Capital Outlay</td>
</tr>
</tbody>
</table>
| Rank Order | Each year (usually in May), LEAs must submit the Eligible Schools Summary Report (ESSR) data to determine which schools are eligible for Title I funding. The data must be entered on the Federal Programs Section in PowerSchool prior to applying for Title I funds since the ESSR data is used to determine school allocations from year to year.  
A PSU must rank all its schools according to their percent of poverty. The ranking is based on the percentage (not the number) of low-income children in each school. |
<p>| REVERSION | When funds expire and are pulled back from the PSU and returned to the US Treasury. |
| REVISIONS | Revisions or amendments to the budget can be made before or after successfully submitting and securing approval on the initial budget. |
| RLIS | The Rural, Low-Income Schools program is part of the Rural Education Achievement Program (REAP) and provides additional funds to help address the unique learning needs for the states most rural PSUs. |</p>
<table>
<thead>
<tr>
<th>SCHOOLWIDE PROGRAMS (SW)</th>
<th>Schoolwide Programs (SW) are outlined in Section 1114 of ESSA. This model allows the most flexibility in the use of Title I funds. To operate a SW program, the school must be at least 40% poverty and must have a Schoolwide Plan.</th>
</tr>
</thead>
<tbody>
<tr>
<td>SET-ASIDES</td>
<td>Reservations of funds earmarked for specific services and programs at the district level to support Title I schools.</td>
</tr>
<tr>
<td><strong>TSI</strong></td>
<td>Targeted Support and Improvement North Carolina must identify schools for targeted support and improvement as defined in the ESSA state plan. These schools receive support at the local level for the identified underperforming subgroups. Listed below are the two categories of identification:</td>
</tr>
</tbody>
</table>
|                        | ● TSI – Consistently Underperforming Subgroups (TSI-CU)  
                        | ● TSI – Additional Targeted Support (TSI-AT) |
| **TAS**                | Targeted Assistance School (TAS) programs are described in Section 1115 of ESSA. TAS qualify for Title I funding by having a percentage of poverty of at least 35%. In this model the students most at risk for not being successful with North Carolina’s challenging curriculum will be identified. The procedure for identifying students must be clearly defined. A list of students who qualify and a list of students being served must be maintained and regularly updated in PowerSchool. The students who are identified as at risk of failing do not have to be students of poverty. |

**APPENDIX 2: TITLE I, PART A**

**Overview**

This program provides financial assistance through State educational agencies (SEAs) to local educational agencies (PSUs) and public schools with high numbers or percentages of poverty to help ensure that all children meet challenging State academic content and student academic achievement standards.

PSUs target the Title I funds they receive to public schools with the highest percentages of children from low-income families. Unless a participating school is operating a schoolwide program, the school must focus Title I services on children who are failing, or most at risk of failing, to meet State academic standards. Schools enrolling at least 40 percent of students from low-income families are eligible to use Title I funds for schoolwide programs that serve all children in the school.

**Supplement, Not Supplant**
To ensure that Title I, Part A funds are used to provide services that are in addition to the services normally provided by a school district for participating children, the district must use these funds to supplement, not supplant regular non-Federal funds.

PSUs are required to establish a methodology of distributing state and local funds to all schools in a Title I neutral manner.

To view the full USED Non-Regulatory Informational Document for Title I Supplement, not Supplant, click HERE.

**Comparability**

PSUs may receive Title I, Part A funds only if it uses State and local funds to provide services in Title I schools that are “comparable” to services provided in non-Title I schools. Comparability is one indication that the PSU is using Title I funds to supplement and not supplant other funding sources. In North Carolina, PSUs must determine comparability annually to receive Title I, Part A funds [Section 1118(c)].

PSUs are required to submit a comparability report through the CCIP system. PSUs gain access to the CCIP on November 1st. The report must be submitted through the CCIP application to the Division by December 1st of the same year. For more information, please review the Comparability Documents (Title I Resources).

**Community Eligibility Provision**

Section 104(a) of the Healthy, Hunger Free Kids Act of 2010 amended the National School Lunch Act to provide an alternative to household eligibility applications for free and reduced-price meals in high poverty PSUs. This alternative is referred to as the Community Eligibility Provision (CEP). The overall purpose of the CEP is to improve access to nutritious meals for students in high poverty areas by providing meals to all students “at no cost” to the students.

Although the USDA, and not the U.S. Department of Education (ED), administers the National School Lunch Program (NSLP), there is a connection between Community Eligibility and programs operated under Title I, Part A (Title I) of the Elementary and Secondary Education Act of 1965, as amended (ESEA), because State educational agencies (SEAs) and PSUs often use NSLP data to carry out certain Title I requirements. Under section 1113 of the ESEA, a PSU must rank its school attendance areas or schools based on the percentage of economically disadvantaged students to determine a school’s eligibility to receive Title I funds, to allocate funds to selected schools, and to calculate the amount generated for Title I services to eligible private school students.

**Parent and Family Engagement**

Involving families as full partners in the education of their children is a cornerstone of ESSA. When families support learning, children are more successful in school and school success helps children become successful adults. Each PSU and school must develop a Parent and Family Engagement
Policy to communicate to parents the PSU’s expectations for the engagement of parents and families. Parents and families must be actively involved in planning, implementing, and reviewing the school and district Parent and Family Engagement Policy. In consultation with parents and families, both district and school policies must be reviewed and revised, if needed, on an annual basis. Parent and Family Engagement Policy and Activities must be shared with parents and families on an annual basis. Communication with families should occur in the native language of the family, to the extent practicable, with interpreters utilized as necessary.

PSUs receiving Title I funds must prepare and disseminate annual report cards for the district and each of its schools. PSUs must also annually notify the parents/guardians of each student attending any Title I school that they may request information regarding certain professional qualifications of the student's classroom teachers (Parent’s Right to Know – Section 1112 (e)) as well as grade level assessments given at the school. Notification is also required when a student is being educated four or more weeks by someone who has not met the licensure requirements of North Carolina.

Each Title I school must jointly develop with parents a school-parent compact as a component of its written parent and family engagement policy. A school-parent compact is a written agreement between the school and the parents of children participating in Title I, Part A programs that typically identifies the activities that the parents, the entire school staff, and the students will undertake to share the responsibility for improved student academic achievement. The compact must be unique to each school. At a minimum, the school-parent compact must include:

- The school’s responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables children to meet the State’s student academic achievement standards;
- Ways in which parents and families will be responsible for supporting their children’s learning (e.g., monitoring attendance, homework completion, or television watching; volunteering in their child’s classroom; or positive use of extracurricular time); and
- The importance of communication between teachers and parents and families on an ongoing basis through, at a minimum:
  - Parent/family-teacher conferences to discuss the compact;
  - Frequent reports to parents and family on their child’s progress; and
  - Reasonable access to staff, opportunities to volunteer and participate in their child’s class, and observation of classroom activities.

For more information and resources on parent and family engagement contact your program administrator and/or visit the following sites:

Multi-Tiered Systems of Support (MTSS) for Families - multi-tiered-systems-support-mtss-families
Early Learning - nc-foundations-early-learning-and-development
Students and Families - students-families
Curriculum and Standards Info for Parents - curriculum-and-standards-info-parents
Local Equity Plan

A component of the PSU Title I plan under Section 1112(b)(2) of the ESSA requires public school units to describe how the PSU will identify and address, as required under State plans as described in section 1111(g)(1)(B), any disparities that result in low-income students and minority students being taught at higher rates than other students by ineffective, inexperienced, or out-of-field teachers. While no specific template is required, local staff may want to develop the local plan based on the template DPI used to develop the state plan to ensure equitable access to excellent educators (state-plan-ensure-equitable-access-excellent-educators).

Homeless Education

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

Identification of Students

Title IX, Part A protects all students who do not have a fixed, regular, and adequate nighttime residence. Students living in the following situations may qualify under the law as homeless:

- doubled-up or sharing the housing with others due to an economic hardship
- runaway/homeless youth shelters (even if parents invite the youth home);
- hotels or motels;
- shelters, including domestic violence shelters;
- transitional housing shelters;
- cars, abandoned buildings, parks, the streets, or other public spaces;
- campgrounds or inadequate trailer homes
Every PSU must designate a homeless liaison to determine a student’s eligibility under the law. The homeless liaison’s primary role is to assist families and school personnel in ensuring that students who are experiencing homelessness can enroll and succeed in school.

**Foster Care Provisions**

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.

**Title I Preschool Program**

Schoolwide programs must include plans for assisting preschool children in the transition from early childhood programs, such as Title I preschool, Head Start, NC Pre-K and other community preschool programs, to local elementary school programs. In addition, targeted assistance programs may also include services to assist preschool children in the transition to elementary school programs.

Under the ESEA, as amended by the ESSA, preschool services to eligible children have been an allowable use of Title I funds. Providing enriching early childhood experiences can help ensure that children in Title I schools and programs have the foundation to meet academic standards and to experience success throughout elementary and secondary school. When preschool is high-quality, it may prevent the need for remediation by addressing children’s educational needs early.

**Funding Preschool Programs**

PSUs are permitted to fund preschool programs for children who are younger than the age of five by August 31, the kindergarten eligibility cutoff date, with Title I funds under three models:

1. A Title I school may use a portion of their Title I allocation to operate a preschool program;
2. An PSU may reserve an amount from its total allocation to operate a preschool program for eligible children in the PSU as a whole or for a portion of the PSU; or
3. An PSU may reserve an amount from its total allocation and use those funds to support other comparable public early childhood education programs to operate Title I preschool programs such as Head Start.
Title I funds may be used in conjunction with funds from other public early childhood education programs to operate a Title I Pre-K program. The proportion of Title I funds in blended classrooms is determined by the percent of Title I children enrolled in the classroom. Title I children may be dually enrolled with State funded Pre-K, if the eligibility requirements are met for both programs, with Title I eligibility being considered first. From a funding perspective, this means that two funding sources are utilized to fund a child’s slot.

**Eligibility**

Children living within the local program’s designated attendance area are eligible to apply for enrollment in the Title I preschool program. Selection is based on academic need. To identify those with the greatest need, local programs design a selection process that utilizes multiple criteria, such as parent interviews, teacher observations, and developmentally appropriate measures of child development (developmentally appropriate measures of child development – the most commonly used in NC are the Brigance Early Childhood Screen or DIAL- Developmental Indicators for the Assessment of Learning). Family income may also be used to determine eligibility, but not as the sole determinant.

**Curriculum**

Curricula used in Title I preschools must be comprehensive, research-based, and aligned with North Carolina’s Early Learning Standards. The learning experiences offered in a Title I preschool promote growth in all developmental domains. Children’s progress is monitored by teachers in an ongoing manner. This process of formative assessment includes multiple means such as observing, collecting work samples, and talking with families, which provides a picture of the whole child. Teachers use this data to guide teaching and learning to meet the individual needs of every child. Family engagement is an integral component of all Title I preschool programs. Communication between home and school strengthens the family’s knowledge and understanding of their child’s development and allows parents and teachers to work together to plan appropriate learning experiences. Teachers use a variety of methods to involve parents in the education of their child, including home visits, conferences, and written/electronic communication.

**Resources:**

- [Title I Preschool NC Standards and Procedures](nc-foundations-early-learning-and-development)
- [Title I and Education of Migrant Children and Youth](https://www.migranteducationprogram.org)

**Title I and Education of Migrant Children and Youth**

Migrant children are eligible for Part A services on the same basis as other children who are selected to receive services. Because PSUs that receive migratory children normally do so on a regular basis, PSUs should consider their needs when planning, or helping schools to plan, Part A services. Regardless of whether an PSU receives migrant funds, the district and school comprehensive needs assessment should include the needs of identified migrant students to ensure that the needs of this highly mobile population are addressed along with other at-risk students within school plans for the schools they attend. For more information, visit the [Migrant Education Program](https://www.migranteducationprogram.org) website.
**Title I and Neglected, Delinquent, or At-Risk Youth**

Two federal grant programs covered under Title I Part D (The Prevention and Intervention Program for Children and Youth Who Are Neglected, Delinquent, or At-Risk) assist the education of certain disadvantaged children. Districts must submit data annually to identify eligible neglected or delinquent facilities residing within PSU boundaries.

Subpart 2 funds may be used by PSUs in collaboration with local facilities for neglected or delinquent youth to:

- To carry out high-quality education programs that prepare children and youth to complete high school, enter training or employment programs, or further their education
- To provide activities that facilitate the transition of such children and youth from the correctional program in an institution to further education or employment
- To operate dropout prevention programs in local schools for children and youth who are at-risk of dropping out or youth returning from correctional facilities

In addition, Subpart 2 funds may be used for:

- Dropout prevention programs that serve at-risk children and youth. An at-risk child or youth means a school-aged individual who is at-risk of academic failure, has a drug or alcohol problem, is pregnant or is a parent, has previously come into contact with the juvenile justice system, is at least 1 year behind the expected grade level for the age of the individual, is a migrant or an immigrant, has limited English proficiency, is a gang member, has previously dropped out of school, or has a high absenteeism rate at school
- Coordination of health and social services for children and youth who are at-risk (e.g., day care, drug and/or alcohol abuse counseling and mental health services) if there is a likelihood that providing such services will help these children complete their education
- Special programs that meet the unique academic needs of children and youth who are at-risk, including vocational and technical education, special education, career counseling, curriculum-based entrepreneurship education and assistance in securing of student loans or grants for postsecondary education
- Programs providing mentoring and peer mediation

For more information regarding Neglected, Delinquent, or At Risk, contact your program administrator or visit the monitoring-neglected-and-delinquent-students website.

**Carryover Limitation**

Under ESEA, as amended by ESSA, no more than fifteen percent (15%) of the Title I, Part A funds allocated to an PSU for any fiscal year may be carried over into the next fiscal year. Funds more than 15% must be encumbered or expended by September 30 of each year. This percentage limitation does not apply to an PSU that receives an allocation of less than $50,000 under subpart 2 of Part A.
If an PSU determined by the SEA that the carryover of Title I allocation exceeds the allowable percentage, the PSU/charter may request a waiver from the State education agency (SEA) once every three years to waive the carryover limitation if

1. the request is reasonable and necessary; or
2. supplemental appropriations become available.

Under the Education Flexibility Partnership Act of 1999 (Ed-Flex), states may be granted the authority to approve waivers more than once in three years. DPI intends to apply to the USED to continue its Ed-Flex authority in future years. For updates on DPI’s Ed-Flex authority, go to the education-flexibility-program.

A PSU has considerable discretion in using carryover funds, however carryover must be expended according to the following:

- Adding carryover funds to the PSU’s current-year allocation and distributing them to participating areas and schools in accordance with allocation procedures, ensuring equitable participation of private school children.
- Allocating to schools with the highest concentrations of poverty in the PSU, thus providing a higher per-pupil amount to those schools while ensuring equitable participation of private school children.
- Providing additional funds for specific activities such as school improvement activities.
- Providing additional funds to any of the activities supported by the reservations outlined in § 200.77 of the Title I regulations. If an PSU adds carryover funds to a reservation to which equitable services apply (e.g., parental involvement), the PSU must also provide equitable services from the carryover funds.

**Note:** Unexpended funds from the parent and family engagement reservation and funds earmarked for equitable services to private schools must be carried forward and expended for the same purpose in the following year.

**Title I Schoolwide Plan Requirements**

1. Schoolwide Plan must be developed within the first year, unless
   - School operated a Schoolwide program prior to the enactment of ESSA
   - PSU/School determines a lesser period is needed to create the plan
2. Plan developed in consultation with the following stakeholders:
   - Parents
   - Community members (if determined they have a role in carrying out the plan)
   - Teachers
   - Principal/Assistant Principal
   - Other School Leaders
   - Paraprofessionals
   - District office – to the extent feasible
   - Tribes or Tribal organization
• Specialized Instructional Support Personnel
• Technical Assistance Providers
• Other School Staff
• Students – only for secondary schools served

3. Schoolwide Comprehensive Plan remains in effect for the duration of school’s participation in a schoolwide program. Although this plan remains in place, it shall be regularly monitored and revised based on student needs.

4. The Schoolwide Comprehensive Plan must be made available to PSU, parents, and the public. The language used in the plan needs to be understandable to everyone. The format must be uniform and provided in home languages.

5. When appropriate and applicable, the plan needs to be developed in coordination and integration with Federal, State, and local services, resources, and programs (examples: Programs supported under ESSA, violence prevention programs, nutrition programs, housing programs, Head Start programs, Adult Education Programs, CTE programs)

6. The Schoolwide Plan is based on a Comprehensive Needs Assessment (CNA). The CNA must at least include:
   • Analysis of student academic achievement
   • Identification of at-risk or failing students

7. The Schoolwide Plan must include a description of:
   • Strategies that the school will implement to address needs identified by CNA. Include how the strategies will
     o Provide opportunities for all children to meet the challenging State academic standards
     o Use methods and instructional strategies that strengthen the academic program in the school, increase the amount and quality of learning time, and help provide enriched and accelerated curriculum – may include programs, activities, and courses necessary to provide a well-rounded education.
     o Address the needs of all children in the school, but particularly the needs of those at risk of not meeting the challenging State academic standards, through activities which may include –
       ▪ Counseling, School-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students’ skills outside the academic subject
       ▪ Preparation for and awareness of opportunities for postsecondary education and the workforce, which may include career and technical education programs and broadening secondary school students’ access to coursework to earn postsecondary credit while still in high school (such as Advanced Placement, International Baccalaureate, dual or concurrent enrollment, or early college high schools);
       ▪ Implementation of a schoolwide tiered model to prevent and address problem behavior, and early intervening services, coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.);
- Professional development and other activities for teachers, paraprofessionals, and other school personnel to improve instruction and use of data from academic assessments, and to recruit and retain effective teachers, particularly in high need subjects; and
- Strategies for assisting preschool children in the transition from early childhood education programs to local elementary school programs;

- If programs are consolidated, the specific State educational agency and local educational agency programs and other Federal programs that will be consolidated in the schoolwide program.

### NCDPI Federal Programs Allowable and Unallowable Costs Expenditure Guidance

<table>
<thead>
<tr>
<th>Line Item</th>
<th>Examples of Allowable Costs</th>
<th>Examples of Unallowable Costs</th>
</tr>
</thead>
</table>
| Instructional/Professional/Support Staff | ● Title I Teacher  
● Academic/Instructional Coaches  
● Tutoring  
● Counselors/Behavior Support  
● Family and Community Engagement Coordinator/Liaisons  
● Title I Instructional Paraprofessionals (teacher assistants)  
● Bookkeeper for Title I, Part A grant work | ● Entire salary unless the individual’s entire responsibility is Title I, Part A  
● Time and work in non-Title I schools or with non-Title I students  
● Principal/Assistant Principal salaries. |
| Administrative/Indirect Cost | ● Title I Director / Coordinator  
● Professional Development Coordinator  
● McKinney-Vento Homeless Liaison | ● Entire salary unless the individual’s entire responsibility is Title I, Part A  
● Administrative cost is not to exceed 12% of allotment  
● Indirect rate greater than the percentage assigned to the Public School Unit (PSU) |
| Employer Provided Benefits | ● Social Security  
● Local Retirement System  
● Hospitalization Insurance  
● Workers’ Comp. Insurance  
● Dental Insurance  
● Life Insurance | ● Volunteer contribution accounts (ex. 401K)  
● If the provided benefits do not match the PSUs policy for benefits system-wide  
● If a salary object code is not attached under the same site code |
| Contracted Services         | ● Professional Development Providers  
● Consultants to upgrade curriculum, instruction, and | ● Substitutes for teachers not attending Title I, Part A funding professional development  
● Extended contracts beyond the life of the grant |
<table>
<thead>
<tr>
<th>Supplies and Materials</th>
<th>student supports (instruction/behavior)</th>
</tr>
</thead>
<tbody>
<tr>
<td>● Third-party providers of Title I supports and initiatives (including software licenses)</td>
<td></td>
</tr>
<tr>
<td>● Dual or concurrent enrollment programs</td>
<td></td>
</tr>
<tr>
<td>● Substitutes for teachers attending Title I, Part A funded professional development opportunities</td>
<td></td>
</tr>
<tr>
<td>● Presenters and interpreters for parent and family engagement events</td>
<td></td>
</tr>
<tr>
<td>● Grants administration activities (including translation services)</td>
<td></td>
</tr>
<tr>
<td>● Contracted instructors that meet state certification requirements (including for equitable services in participating private schools)</td>
<td></td>
</tr>
</tbody>
</table>

**Supplies and Materials**

- Supplies and materials needed to carry out Title I activities according to needs assessment
- Academic assessments to gauge impact of Title I initiatives
- Computers and software for use by Title I students
- Should we make a Technology Section for 461/462 purchases?
- Materials and refreshments (just materials here move refreshments to food) for Title I parent engagement activities/meetings
- Supplies for students experiencing homelessness
- Office supplies for administration of the grant
- Printing/coping for Title I related activities

- Supplies and materials for non-Title I schools and students
- Alcohol, gifts, awards, fundraising cost, gift cards, meals, and souvenirs
- Supplies and materials not used 100% within a Title I program
| Professional Development/Travel | Professional development registration and travel costs for admin and staff engaged in Title I activities  
  | Course reimbursement to advance Title I initiatives  
  | Travel associated with provision of Title I services  
  | Transportation to allow for student access to Title I related initiatives if not available otherwise  
  | Transportation costs to maintain educational stability for students in foster care  
  | Food and beverage reimbursement  
  | Out of state travel not approved by NCDPI – Federal Programs Division  
  | Credit courses not specific to Title I |
| Food and Beverages | Expenditures on food must be reasonable in cost, necessary to accomplish program objectives, and an integral part of the instructional program  
  | Nutritional snacks for students in extended day programs  
  | Nutritional snacks for children in childcare while parents are participating in grant activities  
  | Parent and family engagement activities in which refreshments are necessary to encourage participation and meet program objectives  
  | Full meals for parents or students  
  | Regarding trainings, refreshments or food are not allowed  
  | Refreshments or meals at an awards banquet or event  
  | Gratuities and Tips  
  | Incentives |
| Software Purchases | Software that is currently being used at a school and is approved from Title I funds is only allowable if it has always been paid from Title I funds.  
  | Software must be renewed in the same school year that it is intended for use.  
  | As with other budget codes, purchases/renewals that  
  | Paying for software for the upcoming school year from current Title I funds is not allowed.  
<p>| Supplanting – switching the funding stream |</p>
<table>
<thead>
<tr>
<th><strong>Equipment</strong></th>
<th>• Equipment is an allowable cost, however the PSU must determine that (1) the equipment is reasonable and necessary to operate Title I programs effectively; (2) existing equipment has not been sufficient to support the need and (3) the costs are reasonable</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Supplanting – switching the funding stream</td>
</tr>
<tr>
<td><strong>Entertainment/Social Events</strong></td>
<td>• No allowable costs</td>
</tr>
<tr>
<td></td>
<td>• Costs associated with any type of entertainment, banquets, recreation, or social events are not allowable</td>
</tr>
<tr>
<td><strong>Incentives</strong></td>
<td>• Minimal-cost incentives or instructionally related items to be used in the classroom are acceptable incentives for participation in program activities or recognition. These items should be tied to instructional strategies and activities.</td>
</tr>
<tr>
<td></td>
<td>• Gifts or items that appear to be gifts, souvenirs and memorabilia or promotional items, door prizes, gift cards, cash, food</td>
</tr>
</tbody>
</table>

*Referencing EDGAR- The Uniform Guidance 2 CFR § 200, the following rules apply to federal expenditures.

**Budgeting Codes**

**Site Codes**

000 = District-wide Initiatives (Shared between Title I schools)
810 = Administrative Set-Aside
840 = Preschool - Early Education
860 = Equitable Services for Private Schools

**Fund Code**

3 = Federal Grant Fund

**Purpose Codes**

The reason for which something exists and/or used to accomplish the objectives of a PSU. For budgeting and accounting purposes, expenditures are classified into five purposes as follows:
- 5000 Instructional Services
- 7000 Ancillary Services
- 9000 Capital Outlay
- 6000 System-Wide Support Services
- 8000 Non-Programmed Charges

Object Codes

Are the result of a specific expenditure, directly part or related to the purpose, and the next set of digits after the purpose code. There are seven major object categories in the chart of accounts:

- 100 Salaries
- 200 Employer Provided Benefits
- 300 Purchased Services
- 400 Supplies and Materials
- 700 Transfers
- 500 Capital Outlay
- 600 Reserved for Future Use

Resources


Education Department General Administrative Regulations (EDGAR) and Other Applicable Grant Regulations https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html

Types of Title I Programs

- Title I Targeted Assistance Program (TA) – Funds may be spent on allowable Title I, Part A activities for participating, targeted Title I students, their teachers, and families only in targeted assistance schools.
- Title I Schoolwide Program (SW) – Funds may be spent on allowable Title I activities for any students, teachers, and families of students enrolled in the school.

Title I Set Asides

PSUs are allowed to reserve funds at the district level for earmarked purposes that align to the following categories:

- Administrative (not to exceed 12% of planning allotment)
- School Improvement Interventions (CSI/TSI Schools)
- Financial Incentives or Rewards for recruitment and retention for CSI/TSI schools (5% maximum)
- Professional Development for Teachers in Title I schools
- Parent and Family Engagement (1% minimum for allotments above $500,000)
- Homeless Children and Youth Services (Section 1113(c)(3)(A) – Comparable to Title I PPA)
- Foster Care Transportation
Set Asides are to be used to support district level activities. Due to ESSA per pupil expenditures requirements, any expenditure that can be linked to a certain school or a small group of schools must be budgeted at the school site code and cannot be included in the district set aside amounts (with the exception of N or D, Early Learning, and CSI/TSI). An example is the hiring of lead teachers or instructional facilitators. If the positions are assigned to a school or a set group of schools, the position must be at the school level or cost allocated over the group of schools assigned. This position could only be included as a district set aside if, depending on the PSU size and need, a small number are hired to service all Title I schools in the district. They would not have a set schedule at schools, but rather would respond to the needs that arise in the district.

Resources

- [DRAFT Updated Title I, Part A Equitable Services Non-Regulatory Guidance](March 11, 2019)
- [Crosswalk between draft Title I, Part A guidance on equitable services and prior non-regulatory](March 28, 2019)
- [Schoolwide Program Non-regulatory Guidance, September, 2016](pdf, 202kb)
- [Community Eligibility Provision Guidance](community-eligibility-provision-cep)
- [Local Equity Plans](state-plan-ensure-equitable-access-excellent-educators)
  - Local Educational Agency Plan
  - Equity Plan Webinar (2/28/17)
  - FAQs (2/28/17)

APPENDIX 3: TITLE I, PART C

Overview

The Migrant Education Program (MEP) serves children and youth who fulfill the following criteria:

- Age 3-21;
- Have not yet received a high school diploma or its equivalent;
- Have moved into a school district within the last 36 months;
- Whose parents, guardians, spouses, or selves have moved due to economic necessity and have worked in agricultural production or fishing within the last 36 months

Currently, the North Carolina Migrant Education Program (NCMEP) administers 31 PSU-based programs in 30 counties. In addition, students are served in non-program counties through the efforts of Regional Recruiters and summer mini-grant opportunities.
Students who have moved during the past 12 months and who are most at risk for not meeting state standards are given Priority for Services (PFS). The staff at the state level collaborate with locally based programs to conduct a Comprehensive Needs Assessment (CNA) and design programs to fit students' needs.

**Identification of Students**

All PSUs are encouraged to use the State Occupational Survey to assist the State in identifying potentially eligible students. After potential students are located, they are interviewed by a program recruiter, who will complete a Certificate of Eligibility (COE), the document that establishes a student's eligibility for services. If a PSU does not receive direct Title I, Part C (MEP) funding, a regional recruiter will conduct interviews of potentially eligible students.

**Use of Funds**

In general, Title I, Part C (MEP) funds may be used to provide supplemental services that improve outcomes for migratory children and Out of School Youth (OSY). The services must be based on a comprehensive needs assessment and aligned to the DPI Service Delivery Plan (SDP). DPI conducts a comprehensive needs assessment to guide the design of the MEP Service Delivery Plan on a statewide basis every three years. PSUs operating MEPs must, in turn, conduct a local assessment of needs to:

1. Prioritize the needs of migratory children and youth
2. Ensure those needs relate to priorities established by the SEA
3. Design services based on the unique needs of students in the local program

The Service Delivery Plan at the SEA and the PSU must be designed to assist migrant children and youth in meeting the performance targets adopted by the SEA for all children (e.g., reading and math, high school graduation, school readiness, etc.). In addition, funds may be used to provide supplemental services through activities included, but not limited to:

- Academic instruction
- Remedial and compensatory instruction
- Bilingual and multicultural instruction
- Vocational instruction
- Career education services
- Special guidance; counseling and testing services; health services
- Preschool services

**Resources**

- **Non-Regulatory Guidance for Title I, Part C, Education of Migratory Children (March 2017)**
- **National Certificate of Eligibility (COE) Instructions**
- **NC Service Delivery Plan**
- **North Carolina Migrant Program Education Webpage**
Appendix 4: Title I, Part D

Overview

Title I, Part D, provides funds to support neglected and delinquent youth. The purpose of the funds is:

- To improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging State academic content standards and challenging State student academic achievement standards that all children in the State are expected to meet;
- To provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment; and
- To prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education.

Under the ESEA, as amended by the ESSA, Title I, Part D consists of two subparts:

- Subpart 1 provides financial assistance to State agencies to operate educational programs for children in institutions for neglected or delinquent children and for youth in adult correctional facilities. The State agencies in North Carolina that are eligible for funds are the Department of Juvenile Justice and the Department of Corrections (for incarcerated youth).
- Subpart 2 funds are allocated to PSUs based on annual caseload data of the number of children and youth living in local institutions for delinquent children and adult correctional institutions.

Use of Funds

Except in institution-wide projects, Subpart 1 funds must be used to supplement services targeting the most at-risk children and youth. Following are examples of supplemental services that may be provided:

- Hire additional teachers, aides, educational counselors, and other staff members to provide additional instruction in areas of greatest need
- Train teachers, aides, and other staff members who are actively involved in providing Title I services
- Procure needed educational materials and equipment for Title I instruction, including books, computers, audiovisual equipment and supplies, and classroom materials for industrial arts and vocational training
- Hire transition coordinators or buy new equipment to assist students’ transitions (e.g., purchasing scanners to scan individualized education program (IEP) documents)

Resources
Appendix 5: Title II, Part A

Overview

The Title II, Part A program is designed, among other things, to provide students from low-income families and minority students with greater access to effective educators. Under the ESSA, the term "educators" has been broadened to include teachers, principals, and other school leaders.

The purpose of the program is to develop, implement, and evaluate comprehensive programs and activities to address the learning needs of all students, including children with disabilities, English learners, and gifted and talented students through effective instruction. Title II, Part A grants may be used for innovative and evidence-based activities to attract, select, place, support, and retain excellent educators in every classroom in every school more effectively.

Use of Funds

The following are examples of how Title II, Part A funds may be used:

- Support peer-led, evidence-based professional development in PSUs and schools. Section 8101(42) of ESEA defines “professional development,” specifically noting that the professional development activities are sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused.
- Establish, improve, or support school-based residency programs for teachers and school leaders.
- Develop high-quality educator induction and mentorship programs that where possible are evidence-based and are designed:
  - To improve classroom instruction
  - To improve student learning and achievement
  - To increase the retention of effective teachers, principals, or other school leaders.
- Establish and continuously improve human capital management systems, including educator evaluation and support systems.
- Support “time banks” or flexible time for collaborative planning, curriculum writing, peer observations, and leading trainings; which may include using substitute teachers to cover classes during the school day (ESEA sections 2101(c)(4)(B)(v) and 2103(b)(3)(E))
- Compensate teachers for their increased leadership roles and responsibilities (ESEA sections 2101(c)(4)(B)(vii)(I) and 2103(b)(3)(B))
- Promote educator equity through activities such as creating incentive for effective educators to teach in high-needs schools and developing and implementing initiatives to assist in recruiting, hiring, and retaining effective teachers.
Historically, PSUs have used most of Title II, Part A funds to support reductions in class size and to provide professional development. When using Title II, Part A funds for professional development and class size reduction, the PSU must use funds on evidence-based activities. (ESEA section 2103(b)(3)(D) and (E)). While the ESEA definition of “evidence-based” states that “at least one study” is needed to provide strong evidence, moderate evidence, or promising evidence for an intervention, PSUs, and other stakeholders should consider the entire body of relevant evidence and whether there is evidence that an intervention has substantially improved an important education outcome. For more information on evidence considerations, refer to the USED Non-Regulatory Guidance for Title II, Part A: Building Systems of Support for Excellent Teaching and Learning in Appendix A.

Resources

- USED Non-Regulatory Guidance for Title II, Part A: Building Systems of Support for Excellent Teaching and Leading
- What Works Clearinghouse™

Appendix 6: Title III, Part A

Overview

The purpose of Title III, Part A, among other things, is to help ensure that children who are English Learners (ELs), including immigrant children and youth, attain English proficiency, and develop high levels of academic achievement in English so that all English Learners can meet the same challenging State academic standards that all children are expected to meet.

Identification of English Learners

Under Title VI of the Civil Rights Act of 1964 (Title VI) and the Equal Educational Opportunities Act of 1974 (EEOA), all States and PSUs must ensure that ELs can participate meaningfully and equally in educational programs and services. To meet their obligations under Title VI and the EEOA, PSUs must, for example:

- Identify and assess all potential EL students in a timely, valid, and reliable manner
- Provide EL students with a language assistance program that is educationally sound and proven successful, consistent with Castañeda v. Pickard and the Supreme Court decision in Lau v. Nichols
- Provide sufficiently well prepared and trained staff and support the language assistance programs for EL students
- Ensure that EL students have equal opportunities to meaningfully participate in all curricular and extracurricular activities
- Avoid unnecessary segregation of EL students
- Ensure that EL students who have or are suspected of having a disability under the Individuals with Disabilities Education Act (IDEA) or Section 504 of the Rehabilitation Act of 1973 are identified, located, and evaluated in a timely manner and that the language needs of students who need special education and disability related services because of their disability are considered in evaluations and delivery of services
• Meet the needs of EL students who opt out of language assistance programs
• Monitor and evaluate EL students in language assistance programs to ensure their progress with respect to acquiring English proficiency and grade level content knowledge, exit EL students from language assistance programs when they are proficient in English, and monitor exited students to ensure they were not prematurely exited and that any academic deficits incurred in the language assistance program have been remedied
• Evaluate the effectiveness of a school district’s language assistance program(s) to ensure that EL students in each program acquire English proficiency and that each program is reasonably calculated to allow EL students to attain parity of participation in the standard instructional program within a reasonable period of time
• Ensure meaningful communication with limited English proficient (LEP) parents

Use of Funds

In general, Title III funds may be used to provide supplemental services that improve the English language proficiency and academic achievement of ELs, including through the provision of language instruction educational programs (LIEPs) and activities that increase the knowledge and skills of teachers who serve ELs. All services provided to ELs using Title III funds must supplement, and not supplant, the services that must be provided to ELs under Title VI, EEOA, and other requirements, including those under State or local laws. Therefore, just as prior to enactment of the ESEA, as amended by the ESSA, Title III funds cannot be used to fulfill an PSU’s obligations under Title VI and the EEOA. The following are examples of how Title III, Part A funds may be used:

• Assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, local educational agencies, and schools in establishing, implementing, and sustaining effective language instruction educational programs designed to assist in teaching English Learners, including immigrant children and youth.
• Assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, and local educational agencies to develop and enhance their capacity to provide effective instructional programs designed to prepare English Learners, including immigrant children and youth, to enter all English instructional settings.
• Promote parental, family, and community participation in language instruction educational programs for the parents, families, and communities of English Learners.

Resources

• Non-Regulatory Guidance: English Learners and Title III

Appendix 7: Title IV, Part A

Overview

The Student Support and Academic Enrichment (SSAE) program, authorized under subpart 1 of Title IV, Part A of the ESSA, is intended to help increase the capacity of local educational agencies (PSUs), schools, and local communities to: 1) provide all students with access to a well-rounded education; 2) improve
school conditions for student learning; and 3) improve the use of technology in order to improve the academic achievement and digital literacy of all students.

Use of Funds

A PSU that receives at least $30,000 in SSAE program funds must complete a comprehensive needs assessment. For Title IV A application purposes, the same needs assessment can be referred to for a three-year period. The focus of these funds includes, at a minimum, a focus on well-rounded education, student health and safety, and effective use of technology. Based on the results of that assessment, the PSU must (if they receive $30,000 or more) use:

- At least 20 percent of funds for activities to support well-rounded educational opportunities (ESEA section 4107)
- At least 20 percent of funds for activities to support safe and healthy students (ESEA section 4108)
- A portion of funds for activities to support effective use of technology (ESEA section 4109)
- 15% of that portion can be allocated for technology infrastructure.
- If a PSU receives less than $30,000, then the PSU may choose to place any amount in one of the three focus areas. The 20-20-Portion Rule would not apply in this case.

Within each of these areas, PSUs have broad flexibility to use the SSAE program funds for a variety of activities to improve student outcomes and address the opportunity gaps identified through the needs assessment. Sample activities are as follows:

- Programs and activities to improve instruction and student engagement in STEM subjects
- Programs and activities that use music and the arts, which may include dance, media arts, theater, and visual arts, as tools to support student success through the promotion of constructive student engagement, problem solving, and conflict resolution
- Interventions that build resilience, self-control, empathy, persistence, and other social and behavioral skills
- Use of technology for blended learning
- Use of technology for personalized professional development for educators

Title IV-A Carryover

There is no carryover limit for Title IV A as is the case with Title I, but as with any federal fund allocation, it is highly encouraged to obligate those funds in the year they were awarded. If there are carryover funds for Title IV A, then they must be carried over to the same portion they were set aside for in the previous year.

NOTE: Title IV Part A funds may be used for a broad array of activities. Please refer to the USED guidance document for a more expansive list of allowable activities.
Resources

- USED Non-Regulatory Guidance Student Support and Academic Enrichment Grants
- USED Parent and Educator Guide to School Climate Resources (April 10, 2019)

Appendix 8: Title IV, Part B

Overview

The purpose of the Title IV, Part B, 21st Century Community Learning Centers (CCLC) program is to provide federal funds to establish or expand community Learning centers that operate during out-of-school hours with three specific purposes:

1. Provide opportunities for academic enrichment, including providing tutorial services to help students (particularly students in high poverty areas and those who attend low-performing schools) meet state and local student performance standards in core academic subjects such as reading and mathematics.

2. Offer students a broad array of additional services, programs, and activities, such as youth development activities, service learning, nutrition and health education, drug and violence prevention programs, counseling programs, arts, music, physical fitness and wellness programs, technology education programs, financial literacy programs, environmental literacy programs, mathematics, science, career and technical programs, internship or apprenticeship programs, and other ties to an in-demand industry sector or occupation for high school students that are designed to reinforce and complement the regular academic program of participating students.

3. Offer families of students served by 21st CCLCs opportunities for active and meaningful engagement in their children’s education, including opportunities for literacy and related educational development.

Use of Funds

The USED offers formula funds to SEAs who in turn offer competitive grants to eligible entities. Public or private organizations awarded a grant may use funds only to cover costs that (1) comply with the approved grant application and budget and (2) are reasonable and necessary for the proper and efficient performance and administration of the grant. Activities may include:

- Personnel and personnel benefits
- Staff development and training
- Supplies and materials for students
- Leasing vehicles and other transportation costs (purchasing vehicles is not allowable)
- Rental space, if necessary
Overview

The Rural Education Achievement Program (REAP) under Title VI, Part B of the ESEA, as amended by the ESSA, is designed to address the unique needs of rural school districts. These districts frequently lack personnel and resources needed to compete for federal competitive grants and often receive formula allocations that are too small to be used effectively.

Use of Funds

**Subpart 1- Small, Rural School Achievement Program (SRSA)**

The SRSA program authorizes the USED to award formula grants directly to eligible PSUs. Recipients may use program funds to conduct activities under the following ESEA programs:

- Title I, Part A (Improving Basic Programs Operated by PSUs)
- Title II, Part A (Supporting Effective Instruction)
- Title III (Language Instruction for Limited English Proficient and Immigrant Students)
- Title IV, Part A (Student Support and Academic Enrichment)
- Parent Involvement Activities

In addition, the Alternative Uses of Funds Authority (formerly referred to as REAP-Flex) is a flexibility provision that allows eligible PSUs to combine funding under certain programs to carry out local activities under other specified Federal programs. Eligible PSUs will indicate within the Title II and Title IV applications, if the SRSA flexibility with be utilized.

**Subpart2- Rural and Low-Income Schools (RLIS)**

RLS is designed to address the needs of rural, low-income schools. USED awards formula grants to SEAs, which in turn award subgrants to eligible PSUs on a formula basis. The funds are to be used to carry out activities specified allowed under the following programs:

- Title I, Part A (Improving Basic Programs Operated by PSUs)
- Title II, Part A (Supporting Effective Instruction)
- Title III (Language Instruction for Limited English Proficient and Immigrant Students)
- Title IV, Part A (Student Support and Academic Enrichment)
- Title IV, Part B (21st Century Community Learning Centers)
Appendix 10: Homeless Education – McKinney Vento

Overview

Under ESSA, homeless education is included in Title IX, Part A. The Education of Homeless Children and Youth Program entitles children who are 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 who are not already enrolled. This includes reviewing and revising any laws, regulations, practices, or policies that may act as barriers to the enrollment, attendance, or success of homeless children and youth
- 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 providing transportation to and from the student’s school of origin at the parent’s/guardian’s or unaccompanied youth’s 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

Identification of Students

Title IX, Part A protects all students who do not have a fixed, regular, and adequate residence, such as students living in the following situations:

- doubled-up or sharing the housing with others due to an economic hardship
- runaway/homeless youth shelters (even if parents invite the youth home);
- hotels or motels;
- shelters, including domestic violence shelters;
- transitional housing shelters;
- cars, abandoned buildings, parks, the streets or other public spaces;
- campgrounds or inadequate trailer homes
- abandoned in a hospital

Every PSU and charter school must designate a homeless liaison to determine a student’s eligibility under the law. The homeless liaison’s primary role is to assist families and school personnel in ensuring that students who are experiencing homelessness can enroll and succeed in school.
Use of Funds

Funds are provided by formula to SEAs which in turn offer competitive grants to PSUs to enhance the support provided to children and youth experiencing homelessness in their district. Activities may include, among others, the following:

- Tutoring, supplemental instruction, and enriched educational services that are linked to state achievement standards
- Expedited evaluations of the strengths and needs of homeless children and youths, including needs and eligibility for programs and services
- Professional development and other activities for educators and pupil services personnel
- Assistance to defray the excess cost of transportation for students under section 722(g)(4)(A)
- Early childhood education programs, not otherwise provided through Federal, State, or local funding, for preschool-aged homeless children
- Before- and after-school, mentoring, and summer programs
- Education and training for the parents and guardians of homeless children and youths about the rights of, and resources available to, their children and other activities designed to increase the meaningful involvement of parents and guardians of homeless children and youths in the education of their children
- Development of coordination between schools and agencies providing services to homeless children and youths, as described in section 722(g)(5) [42 U.S.C. § 11432(g)(5)]
- Specialized instructional support services (including violence prevention counseling) and referrals for such services
- Activities to address the needs of homeless children and youths that may arise from domestic violence and parental mental health or substance abuse problems
- Adaptation of space and purchase of supplies for any non-school facilities made available under subsection (a)(2) [services provided with subgrant funds] to provide services under this subsection
- Provision of school supplies, including those supplies to be distributed at shelters or temporary housing facilities, or other appropriate locations
- Provision of other extraordinary or emergency assistance needed to enable homeless children and youths to attend school and participate fully in school activities

Resources

- USED Guidance on Homeless Education (March 2017)
- Homeless Liaison Toolkit
- National Center for Homeless Education