FDOE GRANTS MANAGEMENT UPDATES

2018 FASFEPA/ECTAC FALL FORUM

September 12, 2018

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Reasonable, Necessary, Allowable & Allocable

Reasonable

- 2CFR § 200.404

Cost is reasonable if it does not exceed amount a prudent person would pay under circumstances prevailing at time of purchase. Consider:

- Whether ordinary and necessary for operation of program
- Sound business practices/arms-length bargaining
- Market prices for comparable goods & services
- Whether individuals acted prudently
- Whether individuals deviated from established practices

Necessary and Allowable

Allowable - The cost is an authorized use of program funds under the applicable statute and grant award

Necessary - The cost is needed for the operation and performance of the program

Allocable

- The cost benefits the program in proportion to the amount paid by the program.
- The cost is allocable in accordance with the relative benefits received.
- De Minimis exception

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BUDGET AMENDMENTS

When is an amendment required?

Green Book requires an amendment if there is a change in:

- Scope, goals, or objectives
- Project evaluation scope
- Deliverables
- Work task
- Key or types of personnel/project director
- Obtaining services of third party
- Increase in project amount

Exercises

- Budget Review
- Can I justify this Expense as Allowable, Reasonable & Necessary?

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Monitoring

Why do we Monitor?

- To ensure that programs are following all obligations
- To provide assurances of regulatory compliance
- To provide technical assistance

Types of Monitoring

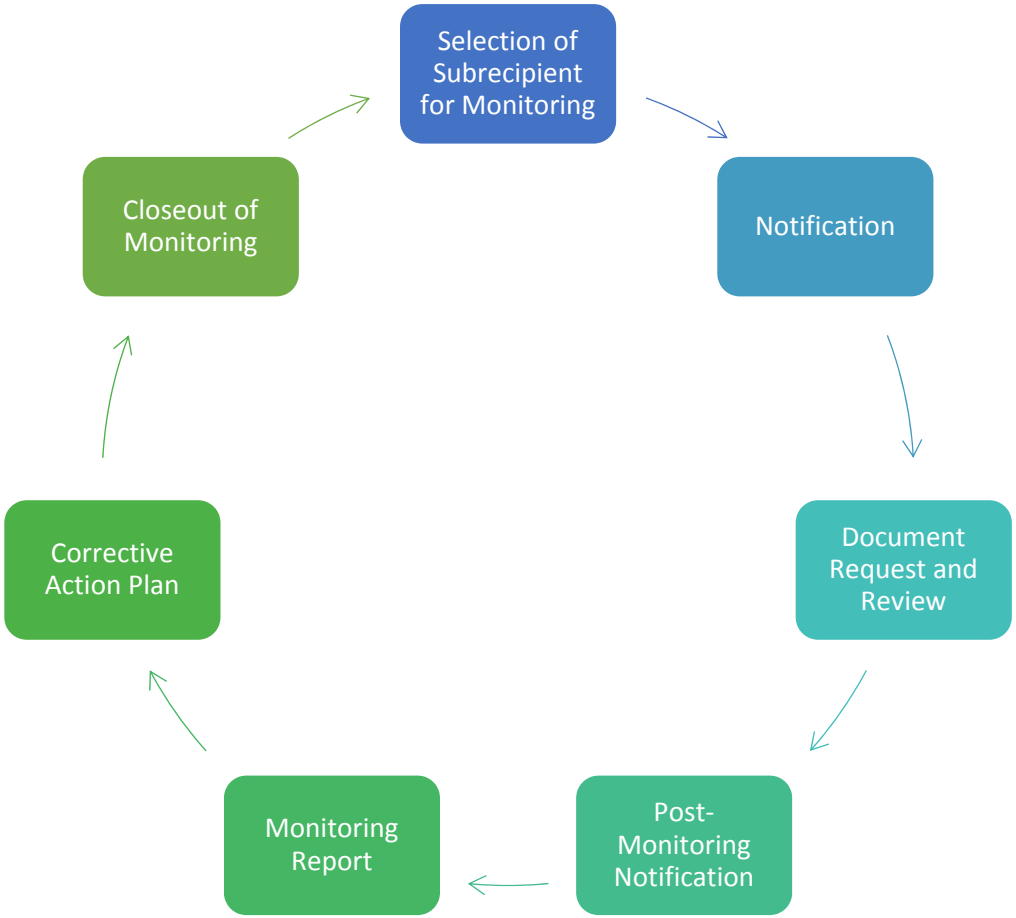
On-Site Monitoring

Desktop Monitoring

Pre-Award Review

Limited Scope Monitoring

Overview of the General Monitoring Process



Selection of Subrecipient for Monitoring

- Typically the selection is made through the use of a risk assessment.
  - DOE 610
  - DOE 620
  - Other metrics

On-Site Monitoring

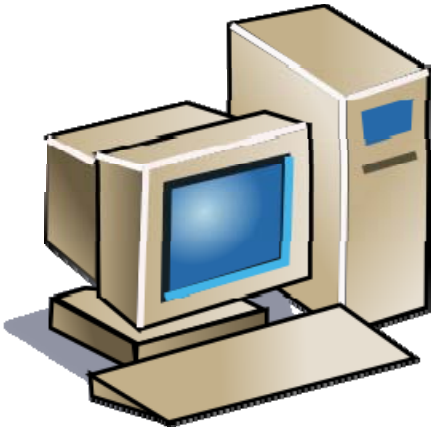
- Includes:
  - An entrance interview
  - Documentation review
  - Site visit(s)
  - An exit interview

Site Visit(s)

- Observe program activities
- Interview staff
- Check inventory items
- Review documentation kept on-site

Desktop Monitoring

- Same as on-site monitoring, except:
  - No site visit
  - No entrance or exit interview
  - Larger initial document request
  - Smaller second document request



Pre-Award Review

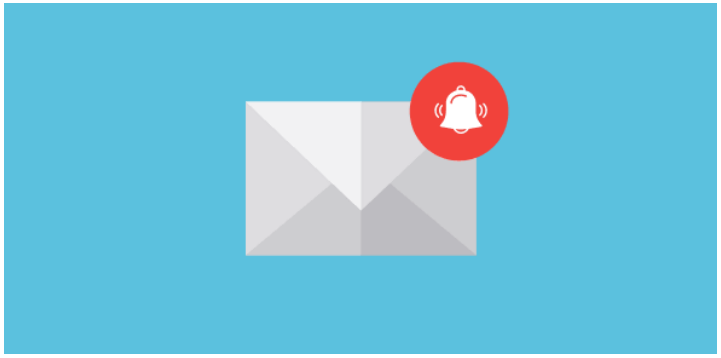
- Review of required policies and procedures
- Applies to all new and continuing programs
- Report emailed after documentation review
- Corrective action may be required

Limited Scope Monitoring

- Monitoring of a specific topic for a specific subrecipient
- More focused than other types of monitoring
- Follows other steps of on-site or desktop monitoring

Post-Monitoring Notice

- A narrative of the potential findings observed or discovered during the monitoring activities
- Sent via email after the monitoring
- Each potential finding requires a response



Monitoring Report

- A formal report of findings of noncompliance
- Incorporates the subrecipient's responses to the post-monitoring notice
- Provides recommendations
- Sent to the agency head and appropriate staff via mail and email

Corrective Action Plan

- Required if there are any findings of noncompliance
- Outlines how the subrecipient will correct findings
- Provides a timeline

Closeout of Monitoring Process

- Corrective action plan is submitted and approved
- All findings have been resolved
- A letter is mailed and emailed to the agency head and appropriate staff

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Supplement-Not-Supplant
ESSA – Traditional

Traditional Presumptions of Supplanting

For Non-Title I Programs, the following presumptions of supplanting apply:

1. Required to be made available under other federal, state, or local laws.
2. Provided with Non-federal funds in the prior year.
3. Same services were provided to other students using non-federal funds.

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Supplement-Not-Supplant
ESSA – Title I

Title I – SNS under ESSA

ESSA Sec. 1118(b)

- Title I, Part A funds must be used to supplement, not supplant state and local resources
- No presumptions
- To demonstrate compliance, the LEA shall demonstrate that the methodology used to allocate state and local funds to each school receiving assistance under this part ensures that the school receives all the State and local funds it would otherwise receive if it were not receiving Title I funds.

Title I – SNS under ESSA

ESSA Sec. 1118(b)(3)

No LEA shall be required to

- Identify individual costs or services as supplemental
- Provide services through a particular instructional method or in a particular instructional setting to demonstrate compliance.

Title I – SNS under ESSA
CAUTION

- ED will apply a specific cost test to DISTRICT-WIDE costs
- Is there a state-mandated requirement?
- Same services provided to non-Title I students using other funds

ED claims this would indicate violation of the methodology test in the statute.

Title I – SNS under ESSA

ESSA sec. 1118(b)(4):

The Secretary may not prescribe the specific methodology a LEA uses to allocate State and local funds to Title I schools.

Title I – SNS under ESSA Exclusion

- ESSA sec. 1118(d)
- SEA or LEA may exclude from a supplanting determination supplemental state or local funds expended for programs that meet the intent and purposes of Title I, Part A.

Title I – SNS under ESSA Exclusion (cont.)

34 C.F.R. 200.79 – a program meets intent and purposes, if it either:

- Is implemented in a school with at least 40 % poverty;
- Is designed to promote schoolwide reform and upgrade the entire educational operation of the school; is designed to meet the educational needs of all students in the school, particularly those who are not meeting state standards; and
- Uses the state assessment system to review the effectiveness of the program; OR

Title I – SNS under ESSA Exclusion (cont.)

- Serves only students who are failing, or most at risk of failing, to meet state standards;
- Provides supplementary services to participating students designed to improve their achievement; and
- Uses the state assessment system to review the effectiveness of the program.

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