

In order to access formula Title funds under the Elementary and Secondary Education Act (ESEA), districts must submit an application to the State Education Agency (SEA) for review and approval. In Oregon, applications are completed through the Continuous Improvement Plan (CIP) Budget Narrative dashboard, which is accessed on the District Secure Website.

CIP Budget Narrative Prerequisites

Completion of the prerequisites is the first step in the application process. Districts must submit five prerequisites prior to being able to submit other sections in CIP Budget Narrative. Completion of the prerequisites also makes 20% of funds available within the Electronic Grants Management System (EGMS). Districts are able to access to 100% of funds once the CIP Budget Narrative application is approved.

Assurances and Prayer Certificate

The following documents must be signed by the superintendent and <u>submitted to ODE</u> by June 30 of each year:

- ESEA Statement of Assurances Assurances form a binding agreement between the local education agency, ODE, and the U.S. Department of Education that assures all legal requirements are met in accordance with state and federal laws, regulations, and rules.
- 2. ESEA Prayer Certificate As a condition of receiving funds under ESEA, school districts must certify, in writing, that no policy of the school district prevents, or otherwise denies participation in, constitutionally protected prayer in public elementary and secondary schools.



Contacts, Private Schools, and Consolidated Spending

The remaining prerequisites must be submitted to ODE by October 1 of each year:

- 3. Contacts Enter the names, email addresses, and phone numbers for the district/ consortia superintendent, fiscal, and Title program staff, as well as liaisons and POCs for McKinney-Vento and Foster Care. Contacts should be updated throughout the year when staffing changes occur.
- **4. Private Schools** All private schools participating in an equitable services program(s) are required to be listed in the CIP Budget Narrative. This includes out-of-district private schools that are only participating in Title I-A. The private school's name, private school's administrator, private school's prior year's enrollment and the date of consultation must be entered. The content of this section will determine whether an Equitable Services Worksheet appears in the CIP Budget Narrative for Title II-A and Title IV-A.
- **5. Consolidated Spending** Indicate whether the district/consortia wishes to accept or decline funds, as well as whether there is an intention to transfer any funds from Title II-A or Title IV-A into other programs. The district also enters its approved indirect rate here. For more on indirect rates, see the ESSA Quick Reference Brief on Administrative Costs.



It is important to note that in order for a consortia to be able to submit a budget narrative, all districts in the consortia must complete their individual prerequisites.

Common Narrative Requirements

While each Title program has a unique purpose and the content of the narratives varies, there are some common requirements across programs.

- Most ESEA programs require a comprehensive needs assessment as the basis for determining
 how to use federal funds. The district's larger needs assessment process, such as that completed
 for the Integrated Guidance application, meets this requirement and should inform the
 strategies and activities included in the CIP Budget Narrative.
- Costs for staff are generally an allowable use of federal formula funds. When including costs for staffing in any budget narrative, include the amount of FTE or hours worked and a brief description of responsibilities.
- In determining the allowability of a particular activity, districts/consortia must consider whether
 the activity is authorized under a particular Title program and the cost principles described in
 the Uniform Grants Guidance (UGG). This includes meeting the requirements of necessary,
 reasonable, and allocable and ensuring that supplanting does not occur.
- Include a brief description of any supplies or materials purchased with federal funds.

Revising Approved Narratives

Needs may change during the year. CIP Budget Narratives should be revised and resubmitted any time a **new activity** is added, or if the **change to an approved activity exceeds 10% in cost**.

Equitable Services

Each district or consortium that receives federal funds must annually consult with eligible, non-profit private schools in order to designate a portion of those funds to address the strengths and needs of private school students, as well as their teachers and families. Program eligibility and the types of services provided to private schools are determined during annual consultation and will vary depending on program. The services agreed upon during consultation are described in the CIP Budget Narrative for each participating school.

A district or consortium may set reasonable deadlines, taking into consideration private school schedules, for private school officials to submit information necessary to provide equitable services. A district or consortium must provide clear and sufficient notice of the deadline, identify potential consequences for not meeting the deadline, and give adequate time for private school officials to respond. When possible, deadlines should be set during consultation discussions. For more information, resources and tools for administering equitable services, please visit the ODE's Private School Participation Under ESEA webpage.

¹ Title I-A Equitable Services Non-Regulatory Guidance of ESEA, <u>Title VIII, Part F Non-Regulatory Guidance of ESEA</u>



Reconciling Budget Narratives

Reconciliation refers to the process of ensuring that actual spending aligns to the approved narrative. This process is important because it allows the district/consortia to:

- demonstrate that the award has been used as intended,
- identify transaction errors;
- ensure that award expenditures are complete; and
- plan for remaining funds as <u>carryover</u>.

Additionally, part of the ESEA monitoring process involves comparing approved narratives to expenditure reports. By implementing a regular routine for reconciliation, the district can avoid potential findings. **Reconciliation is required at least annually,** but recommended quarterly.

Methods for Reconciling

- Revise the narrative. For current narratives, it is possible to make revisions through the <u>CIP</u>
 <u>Budget Narrative dashboard</u>, and resubmit for approval.
- Submit a Carryover Revision Form. Approved Carryover narratives cannot be revised in CIP
 Budget Narrative. Instead, districts/consortia <u>must</u> complete the <u>Carryover Revisions Request</u>
 <u>form</u> and email it to the appropriate ODE program specialist/grant manager.
- Submit a reimbursement to ODE. If expenditures are identified during reconciliation that are
 not allowable or were charged to the wrong account, use the <u>Fiscal Return to the Oregon</u>
 <u>Department of Education</u> form to return the funds.

Recommendations for Practice

- Maintain focus on the result of the needs assessment. Activities should address needs and strategies identified through data analysis and engagement of staff, students, families, tribes², and community members.
- Follow CIP Budget Narrative guidelines by title program.
 - o For Titles I-A, II-A, IV-A and V-B use the CIP Budget Narrative checklists.
 - o For **Title IC** follow the Fiscal Management section of the Title IC <u>Director's Handbook</u>.
 - For **Title III** follow the Detailed/Budget Narrative Questions Template on the <u>Funding</u> webpage.
- Reflect on effectiveness. The district/consortia's use of funds represents an investment in students and staff. When planning, identify measures that will be used to determine the impact of selected strategies and activities. At the end of the school year, review how resources, including funding and staff, were allocated and to evaluate the impact of the investment.

² Under section 8538, an affected LEA is one that either: 1) has 50 percent or more of its student enrollment made up of AI/AN students; or 2) received an Indian education formula grant under Title VI of the ESEA, as amended by the ESSA, in the previous fiscal year that exceeds \$40,000. Consultation is required for all Title programs, not just Title VI.



• *Plan with sustainability in mind.* Federal funding is not guaranteed to be stable from year to year. While the use federal funds to support staffing costs is allowable, it is important to plan so that staffing is not disrupted when funding fluctuates.

Resources

- Education Department General Administrative Regulations
- <u>Electronic Code of Federal Regulations</u> (Part 200)
- Oregon Federal Funds Guide
- CIP Budget Narrative User Guide
- Carryover Narrative Revision Request Form
- CIP Budget Narrative Checklists
- ODE Reimbursement Form
- Administrative Costs Brief
- Carrying Over Federal Funds Brief
- Determining Allowability Brief
- Supplement not Supplant Brief
- Private School Participation Under ESEA