

# ESEA: Title V, Part B 2022-2023 Annual Report

## Rural Education Achievement Program



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# Title V, Part B Program Staff

Georgia Department of Education

Federal Programs Division

Title V, Part B  
Rural Education Achievement Program

Eric McGhee, Grants Program Manager

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## Georgia's System of Continuous Improvement



Georgia's System of Continuous Improvement guides the work of the Georgia Department of Education (GaDOE) to ensure that the work of the agency is aligned across all divisions, departments, and programs. The Georgia's Systems of Continuous Improvement framework focuses on the systems and structures (the "what") that must be in place for sustained improvement in student outcomes. It also utilizes a problem-solving model (the "how") to provide a clear process for identifying improvement needs, planning for improvement, and implementing, monitoring, and evaluating the improvement efforts. This framework is designed to provide meaningful support to schools and districts in the school improvement process.



## Grant Implementation Overview

In Georgia, the Georgia Department of Education (GaDOE) sets policy, develops guidance and provides training and technical assistance for Georgia LEAs. A Grants Programs Manager and one Education Program Specialist provide technical assistance to all Title V, Part B grantees in the state. Training is coordinated at a state level and delivered through (a) virtual learning series, (b) collaborative federal program sessions and webinars, and (c) Grants Unit only webinars. The GaDOE publishes an annual LEA Title V, Part B Handbook and maintains a public website containing resources to support LEAs in the implementation and oversight of the Title V, Part B program. In addition, the Federal Programs website contains the overarching handbook addressing overarching requirements for all federal programs.

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The Federal grant (15-month grant cycle) is cyclical in nature, beginning in July and ending September of the following year. In Georgia, LEAs begin by completing an internal Comprehensive Needs Assessment and consolidated federal grant application called the Consolidated LEA Improvement Plan (CLIP) and Consolidated Application, respectively. The application is maintained in the Georgia Longitudinal Data System (LDS) and is supported by regional Continuous Improvement Teams (CITs). Once approved, LEAs submit a budget based on their formula-based allocation. Then LEAs administer the grant, submitting budget adjustments/amendments, as needed. Although LEAs can carryover 100% of allocated funds, it is expected that LEAs, in the best

interests of teachers and students, draw down funds regularly throughout the year and expend all funds as budgeted. LEAs' work is supported by the Title V, Part B Education Program Specialist; however, LEAs requiring targeted support may be further assisted by Continuous Improvement Teams (CIT) comprised of staff across three GaDOE Divisions (Federal Programs, School and District Effectiveness, and Teaching and Learning).

LEAs are formally monitored for compliance through GaDOE Cross-functional Monitoring (CFM) every five years, and/or depending on annual risk assessment results more frequently. The Title V, Part B Education Program Specialist, along with the Program Manager and other members of the Grants Unit, are cross trained and are scheduled to monitor the Title V, Part B program in their assigned LEAs; a practice which encourages objectivity and fosters a stronger alignment of expectations and technical assistance.

LEAs receiving findings as part of the cross-functional monitoring completed corrective actions to ensure they have internal controls and protocols that ensure compliance with federal law, federal regulations (EDGAR), and federal and state guidance. Based on the GaDOE 5-year cross-functional monitoring cycle, any LEA that does not participate in CFM completes an annual self-monitoring review.

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The Georgia Department of Education (GaDOE) provides continual training, professional development, and support to Title V, Part B grant recipients throughout each fiscal year. In addition to providing individualized face-to-face training at the request of local educational agencies (LEAs), GaDOE provides periodic online trainings on topics such as development of a comprehensive needs assessment, developing the annual plan based on identified needs, budgeting funds, completing the annual evaluation, monitoring requirements, and more. In addition, training materials are available via the website, the federal programs handbook, and other disseminated print materials. The Title V, Part B Program Specialist works with RLIS grantees on an ongoing basis via email, telephone, virtual and face to face meetings to provide individualized technical assistance to districts.

In Georgia, LEAs are required to have an external audit each year. Any audits from prior fiscal years that require program review are reported by the Georgia Department of Audits to GaDOE and GaDOE program staff resolve these audits. These are resolved directly with the LEAs.

LEAs conclude the federal fiscal year with a completion report, finalized in the Grants Accounting Online Reporting System (GAORS).

# RLIS Objectives and Outcomes

Title V, Part B of Every Student Succeeds Act, or ESSA, provides funding to address the unique needs of rural local education agencies (LEAs) that:

1. Lack the personnel and resources needed to compete effectively for Federal competitive grants.
2. Receive formula grant allocations often too small to be effective in meeting their intended purpose.

There are two separate grant programs within Title V, Part B:

- The Small Rural School Achievement Grant Program (SRSA) (Section 5211) is funded directly by the U.S. Department of Education (US ED).
- The Rural and Low-Income School Program (RLIS) (Section 5221) provides federal funds to the Georgia Department of Education (GaDOE) which allocates funds to rural LEAs serving concentrations of poor students.
- Under ESSA, LEAs may be found eligible for both programs and must select either SRSA or RLIS.

The Georgia Department of Education's (GaDOE) strategic plan outlines nine strategic goals to ensure that each Georgia student is afforded a high quality and holistic public education. The Rural and Low-Income Schools Program (RLIS) aligns with and supports strategic goals 1, 2, 3, 6 and 7 as described in Georgia's Strategic Plan, and as listed below, to support the academic goals of both the state as a whole and LEAs. LEAs develop their individual goals based upon needs identified through Georgia's Systems of Continuous Improvement framework. LEAs' progress is determined based on their schools meeting established performance indicators, which are assessed annually through state-administered assessments and local performance assessments.

The strategic goals that align with the RLIS program are:

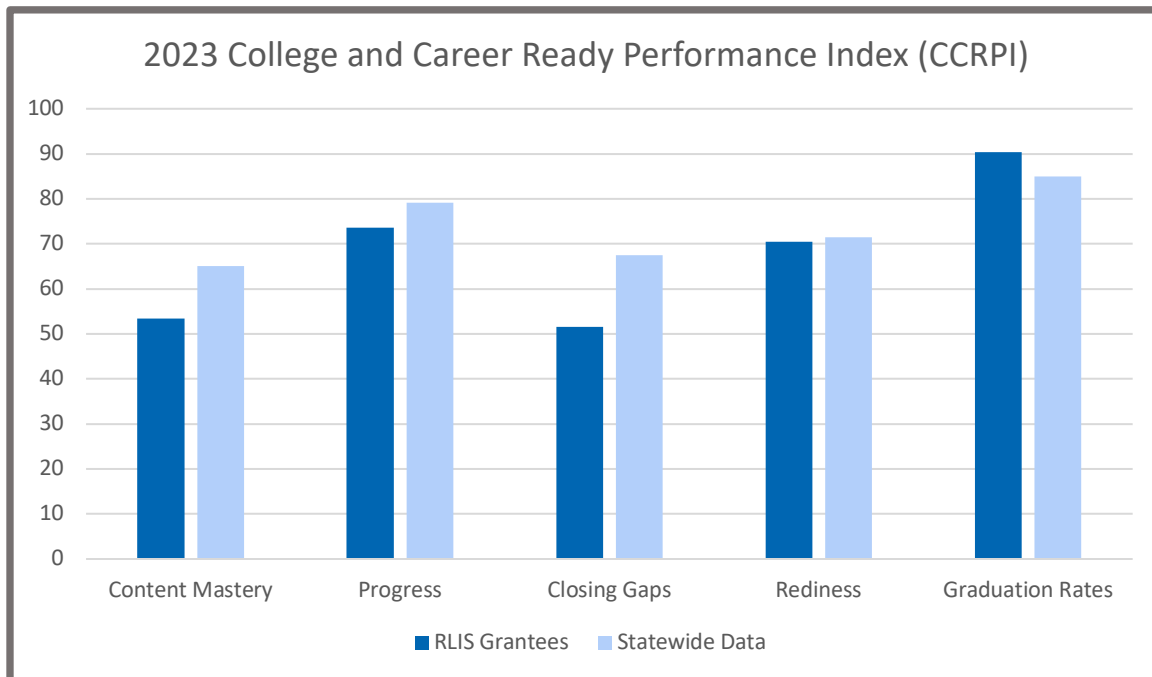
- Revise/develop and implement viable academic standards that engage learners with essential knowledge, skills, and enduring concepts;
- Increase the percentage of K-5 students with a strong knowledge of foundational skills and concepts;
- Increase the percentage of high school graduates who are college and / or career ready;
- Increase LEA, leader, and teacher effectiveness through high-quality service and support; and
- Increase the number of schools with a safe, healthy, and positive learning climate.

## RLIS LEA CCRPI Score Distribution

Under the federal Every Student Succeeds Act (ESSA), each U.S. state is required to have a statewide accountability system that complies with federal requirements, providing information on how well schools are performing.

The College and Career Ready Performance Index (CCRPI) meets that requirement in Georgia, as well as satisfies requirements for school accountability in state law. The CCRPI is Georgia's annual tool for measuring how well its schools, districts, and the state itself are preparing students for the next educational level. It provides a comprehensive roadmap to help educators, parents, and community members promote and improve college and career readiness for all students.

The CCRPI includes five main components: Content Mastery, Progress, Closing Gaps, Readiness, and Graduation Rate (high school only).



The 2023 College and Career Ready Performance Index (CCRPI) scores show improvements in Content Mastery, with the highest component scores in Progress and Readiness.

The CCRPI no longer includes an overall, 0-100 score for schools, districts, or the state. This change was first implemented in 2022 under an addendum received from the U.S. Department of Education, and made permanent this year under an amendment to Georgia's Every Student Succeeds Act (ESSA) plan.



Each CCRPI component – Content Mastery, Progress, Closing Gaps, Readiness, and Graduation Rate for high schools – still has a 0-100 score. The change was made to increase transparency and provide a more complete picture of school performance, ensuring that challenges and opportunities are not hidden behind a single score. Overall, schools scored highest on the Readiness and Progress components. Readiness includes literacy scores; data on the percentage of students succeeding in “beyond the core” instruction, Career Pathways and accelerated enrollment; college and career readiness; and student attendance. Progress measures how much growth students demonstrate in English language arts and mathematics and how well English learners are progressing toward English language proficiency.

Scores were lower for Closing Gaps, which measures how well schools meet annual improvement targets for student subgroups, and Content Mastery, which includes student scores on statewide assessments in English language arts, mathematics, science, and social studies. However, Content Mastery scores improved from 2022 to 2023 – with the statewide score increasing from 64.7 to 65 for high schools.

In 2023, there were 154 Distinguished and Reward Schools in the state of Georgia and 35 of these schools were receiving Title V, Part B funds. The Distinguished Schools designation recognizes the highest-performing Title I schools in Georgia, while the Reward Schools designation recognizes Title I schools making the most significant improvements. Distinguished Schools are among the highest-performing 5% of Title I Schoolwide and Title I Targeted Assistance schools based on the combined ELA and math content mastery scores from the statewide assessments of the most recent year.

## 2022-2023 State Education Agency (SEA) Allocation

SEA allocations are determined using a formula outlined in ESSA. The state formula is based on the number of students in average daily attendance served by the eligible local educational agency (LEA). The GaDOE sets aside 5% of the amount of the grant for State administrative costs.

<b>FY 23 Allocation Information</b> <b>LEAs eligible for the Rural and Low-Income School Program</b>	
<b>FY23 Total Title V, Part B allocation to GADOE from USED</b>	<b>\$ 7,991,578</b>
<b>FY23 Title V, Part B Administration set aside - 5%</b>	<b>(\$399,578)</b>
<b>Total Title V, Part B Allocation to Districts</b>	<b>\$7,592,000</b>
<b>Per Pupil Average based on ADA Recount- RLIS eligible only LEAs</b>	<b>\$29.46</b>
<b>Number of LEAs receiving RLIS funds</b>	<b>97</b>

*Source: US Department of Education Grant Award Notification, award number S358B220010*

# Use of Funds

The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESEA) authorizes two Rural Education Achievement Program (REAP) programs: the Small, Rural School Achievement (SRSA) program and the Rural and Low-Income School (RLIS) program. RLIS funds may be used for any allowable activities under Title I, Part A, Title II, Part A, Title III, and Title IV, Part A, as well as parental involvement activities. Both SRSA and RLIS funds must be used to supplement, and not supplant, any other Federal, State, or local education funds. An LEA may only use REAP funds for allowable costs, as defined in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements (Uniform Guidance, [2 C.F.R. Part 200](#)), which include, among other things, the requirement that costs be reasonable and necessary for the accomplishment of program objectives. However, the question of allowability is fact specific, for example, whether a use of funds is reasonable and necessary and supplements but does not supplant other uses of funds depends on the specific circumstances in the LEA.

Title V, Part B provides funds for rural and low-income districts to be used for supplemental activities authorized under the following federal formula grants:

**Title I, Part A** (Improving Basic Programs Operated by LEAs)

**Title II, Part A** (Improving Teacher Quality)

**Title III** (Language Instruction for English Learners and Immigrant Students)

**Title IV, Part A** (Student Support and Academic Enrichment Grants)

Parent Involvement Activities

*ESEA SEC. 5222. [20 U.S.C. 7351a] Uses of Funds*

# 2022-2023 Rural and Low-Income Schools Program LEA Eligibility

Title V, Part B awards grants to eligible local educational agencies based on formula. A local educational agency is eligible to receive a grant if:

1. 20 percent or more of the children ages 5 through 17 served by the local educational agency are from families with incomes below the poverty line based on data provided by the United States Census Bureau and United States Department of Education (USDE).; and
2. All the schools served by the agency are designated with a local code of 32,33, 41, 42, or 43, as determined by the National Center for Education Statistics based on the geographic location of each individual school in the LEA.

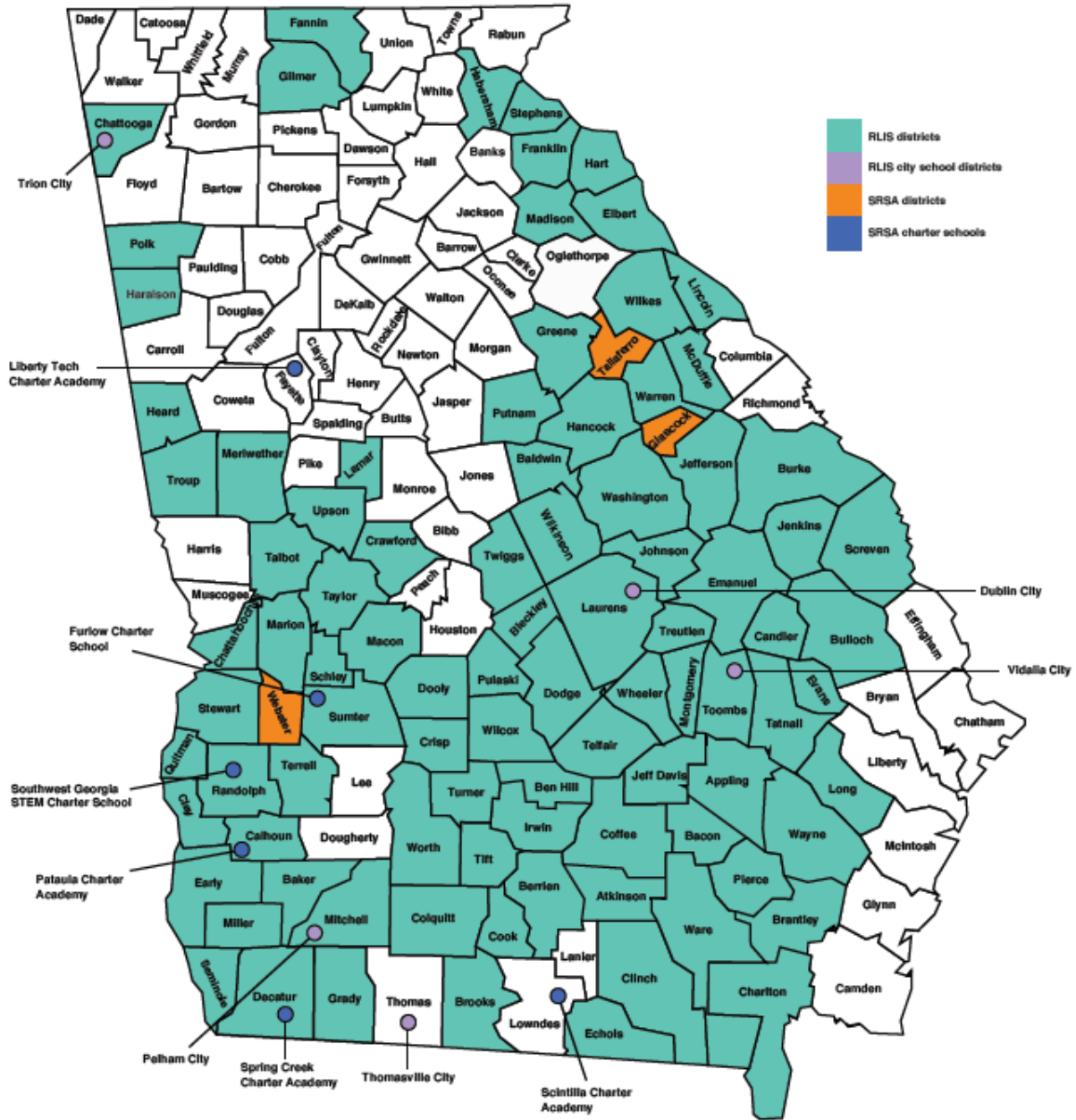
Rural Education Initiative Eligibility	
Districts Eligible for RLIS allocation	97
Dual Eligible Districts (SRSA and RLIS)	7
SRSA Eligible Only	7

*Source: REAP Fiscal Year 2023 Eligibility Summary; US Department of Education*

7 LEA's Eligible for SRSA Only
Glascocock County
State Charter Schools II- Furlow Charter School
State Charter Schools II- Liberty Tech Charter Academy
State Charter Schools II- Pataula Charter Academy
State Charter Schools II- Southwest Georgia S.T.E.M. Charter
State Charter Schools II- Spring Creek Charter Academy
State Charter Schools- Scintilla Charter Academy



# FY23 Title V, RLIS State Map



## 2022-2023 LEA Allocations

Allocations are received from the United States Department of Education (ED) in early summer, after which allocations to LEAs are determined by GaDOE and approved by the State Board of Education. Eligible LEAs may obligate Title V, Part B funds during the federal fiscal year for which the funds were appropriated and during the succeeding federal fiscal year. The funding period gives the eligible LEAs 27 months to obligate their funds. It is the expectation of the US ED and the GaDOE that Title V, Part A, RLIS funding be expended during the year in which it is allocated. There are no carryover limitations placed on Title V, Part B funds.

Grantee	LEA	Eligible ADA	FY23 Title V-B Allocation
1	APPLING COUNTY SCHOOL DISTRICT	3268	\$96,259
2	ATKINSON COUNTY SCHOOL DISTRICT	1557	\$45,862
3	BACON COUNTY SCHOOL DISTRICT	1980	\$58,321
4	BAKER COUNTY SCHOOL DISTRICT	276	\$8,130
5	BALDWIN COUNTY SCHOOL DISTRICT	4719	\$138,999
6	BEN HILL COUNTY SCHOOL DISTRICT	2833	\$83,446
7	BERRIEN COUNTY SCHOOL DISTRICT	2886	\$85,007
8	BLECKLEY COUNTY SCHOOL DISTRICT	2384	\$70,221
9	BRANTLEY COUNTY SCHOOL DISTRICT	3201	\$94,286
10	BROOKS COUNTY SCHOOL DISTRICT	2092	\$61,620
11	BULLOCH COUNTY SCHOOL DISTRICT	10394	\$306,157
12	BURKE COUNTY SCHOOL DISTRICT	3954	\$116,466
13	CALHOUN COUNTY SCHOOL DISTRICT	469	\$13,814
14	CANDLER COUNTY SCHOOL DISTRICT	2102	\$61,915
15	CHARLTON COUNTY SCHOOL DISTRICT	1584	\$46,657
16	CHATTAHOOCHEE COUNTY SCHOOL DISTRICT	868	\$25,567
17	CHATTOOGA COUNTY SCHOOL DISTRICT	2505	\$73,785
18	CLAY COUNTY SCHOOL DISTRICT	182	\$5,361
19	CLINCH COUNTY SCHOOL DISTRICT	1224	\$36,053
20	COFFEE COUNTY SCHOOL DISTRICT	7170	\$211,193
21	COLQUITT COUNTY SCHOOL DISTRICT	8616	\$253,785
22	COOK COUNTY SCHOOL DISTRICT	2970	\$87,482
23	CRAWFORD COUNTY SCHOOL DISTRICT	1575	\$46,392
24	CRISP COUNTY SCHOOL DISTRICT	3531	\$104,006
25	DECATUR COUNTY SCHOOL DISTRICT	4254	\$125,302
26	DODGE COUNTY SCHOOL DISTRICT	2870	\$84,536
27	DOOLY COUNTY SCHOOL DISTRICT	1124	\$33,108
28	EARLY COUNTY SCHOOL DISTRICT	1723	\$50,751
29	ECHOLS COUNTY SCHOOL DISTRICT	812	\$23,918
30	ELBERT COUNTY SCHOOL DISTRICT	2904	\$85,538
31	EMANUEL COUNTY SCHOOL DISTRICT	3869	\$113,962
32	EVANS COUNTY SCHOOL DISTRICT	1767	\$52,047
33	FANNIN COUNTY SCHOOL DISTRICT	2790	\$82,180
34	FRANKLIN COUNTY SCHOOL DISTRICT	3527	\$103,888

35	GILMER COUNTY SCHOOL DISTRICT	3973	\$117,025
36	GRADY COUNTY SCHOOL DISTRICT	4308	\$126,893
37	GREENE COUNTY SCHOOL DISTRICT	2420	\$71,281
38	HABERSHAM COUNTY SCHOOL DISTRICT	6642	\$195,641
39	HANCOCK COUNTY SCHOOL DISTRICT	734	\$21,620
40	HARALSON COUNTY SCHOOL DISTRICT	3121	\$91,929
41	HART COUNTY SCHOOL DISTRICT	3356	\$98,851
42	HEARD COUNTY SCHOOL DISTRICT	1974	\$58,144
43	IRWIN COUNTY SCHOOL DISTRICT	1570	\$46,245
44	JEFF DAVIS COUNTY SCHOOL DISTRICT	2892	\$85,184
45	JEFFERSON COUNTY SCHOOL DISTRICT	2151	\$63,358
46	JENKINS COUNTY SCHOOL DISTRICT	1060	\$31,222
47	JOHNSON COUNTY SCHOOL DISTRICT	1014	\$29,867
48	LAMAR COUNTY SCHOOL DISTRICT	2570	\$75,700
49	LAURENS COUNTY SCHOOL DISTRICT	6107	\$179,882
50	LINCOLN COUNTY SCHOOL DISTRICT	1066	\$31,399
51	LONG COUNTY SCHOOL DISTRICT	3711	\$109,308
52	MACON COUNTY SCHOOL DISTRICT	1086	\$31,988
53	MADISON COUNTY SCHOOL DISTRICT	4803	\$141,473
54	MARION COUNTY SCHOOL DISTRICT	1214	\$35,759
55	MCDUFFIE COUNTY SCHOOL DISTRICT	3330	\$98,086
56	MERIWETHER COUNTY SCHOOL DISTRICT	2204	\$64,919
57	MILLER COUNTY SCHOOL DISTRICT	739	\$21,767
58	MITCHELL COUNTY SCHOOL DISTRICT	1239	\$36,495
59	MONTGOMERY COUNTY SCHOOL DISTRICT	871	\$25,655
60	PIERCE COUNTY SCHOOL DISTRICT	3418	\$100,678
61	POLK COUNTY SCHOOL DISTRICT	7413	\$218,351
62	PULASKI COUNTY SCHOOL DISTRICT	1210	\$35,641
63	PUTNAM COUNTY SCHOOL DISTRICT	2871	\$84,566
64	QUITMAN COUNTY SCHOOL DISTRICT	265	\$7,806
65	RANDOLPH COUNTY SCHOOL DISTRICT	710	\$20,913
66	SCHLEY COUNTY SCHOOL DISTRICT	1191	\$35,081
67	SCREVEN COUNTY SCHOOL DISTRICT	2063	\$60,766
68	SEMINOLE COUNTY SCHOOL DISTRICT	1250	\$36,819
69	STEPHENS COUNTY SCHOOL DISTRICT	3779	\$111,311
70	STEWART COUNTY SCHOOL DISTRICT	402	\$11,841
71	SUMTER COUNTY SCHOOL DISTRICT	3478	\$102,445
72	TALBOT COUNTY SCHOOL DISTRICT	443	\$13,049
73	TATTNALL COUNTY SCHOOL DISTRICT	3528	\$103,918
74	TAYLOR COUNTY SCHOOL DISTRICT	1271	\$37,437
75	TELFAIR COUNTY SCHOOL DISTRICT	1526	\$44,949
76	TERRELL COUNTY SCHOOL DISTRICT	1124	\$33,108
77	TIFT COUNTY SCHOOL DISTRICT	7441	\$219,176
78	TOOMBS COUNTY SCHOOL DISTRICT	2721	\$80,147
79	TREUTLEN COUNTY SCHOOL DISTRICT	1049	\$30,898
80	TROUP COUNTY SCHOOL DISTRICT	11655	\$343,300
81	TURNER COUNTY SCHOOL DISTRICT	1097	\$32,312
82	TWIGGS COUNTY SCHOOL DISTRICT	698	\$20,560
83	THOMASTON-UPSON COUNTY SCHOOL DISTRICT	3898	\$114,816
84	WARE COUNTY SCHOOL DISTRICT	5774	\$170,074
85	WARREN COUNTY SCHOOL DISTRICT	619	\$18,233

86	WASHINGTON COUNTY SCHOOL DISTRICT	2913	\$85,803
87	WAYNE COUNTY SCHOOL DISTRICT	4742	\$139,676
88	WHEELER COUNTY SCHOOL DISTRICT	887	\$26,127
89	WILCOX COUNTY SCHOOL DISTRICT	1136	\$33,461
90	WILKES COUNTY SCHOOL DISTRICT	1304	\$38,409
91	WILKINSON COUNTY SCHOOL DISTRICT	1103	\$32,489
92	WORTH COUNTY SCHOOL DISTRICT	2984	\$87,894
93	DUBLIN CITY SCHOOL DISTRICT	2201	\$64,831
94	PELHAM CITY SCHOOL DISTRICT	1321	\$38,910
95	THOMASVILLE CITY SCHOOL DISTRICT	2576	\$75,876
96	TRION CITY SCHOOL DISTRICT	1233	\$36,318
97	VIDALIA CITY SCHOOL DISTRICT	2319	\$68,306

Source: FY23 SPREADSHEET FOR SMALL, RURAL SCHOOL ACHIEVEMENT PROGRAM AND RURAL LOW-INCOME SCHOOL PROGRAM; Georgia Department of Education

## Maintenance of Effort

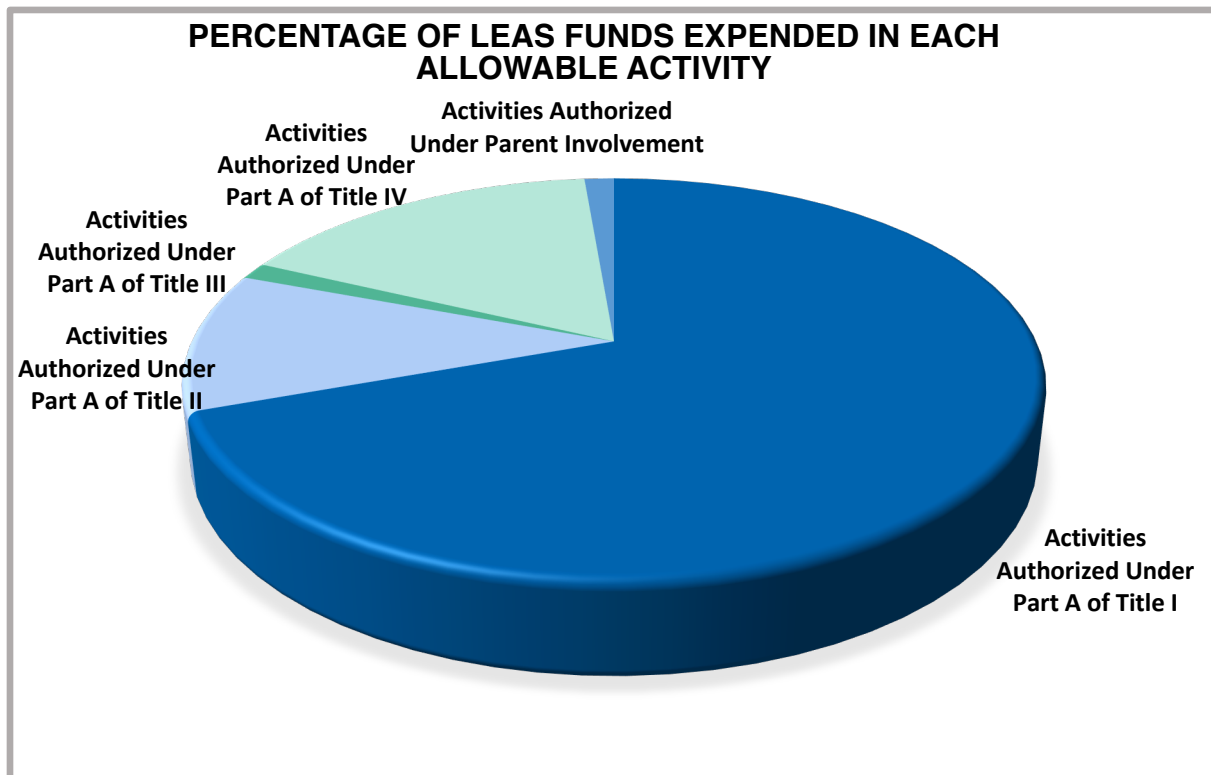
ESSA addresses the LEA’s responsibility to maintain local funding. If a LEA fails to maintain fiscal effort, the State Education Agency may be required to reduce the current year allocation. When notified by the GaDOE Finance Division that an LEA has failed to maintain effort, GaDOE Title I, Part A program staff completes the necessary waiver on behalf of the LEA. In FY23, all LEAs met maintenance of effort.



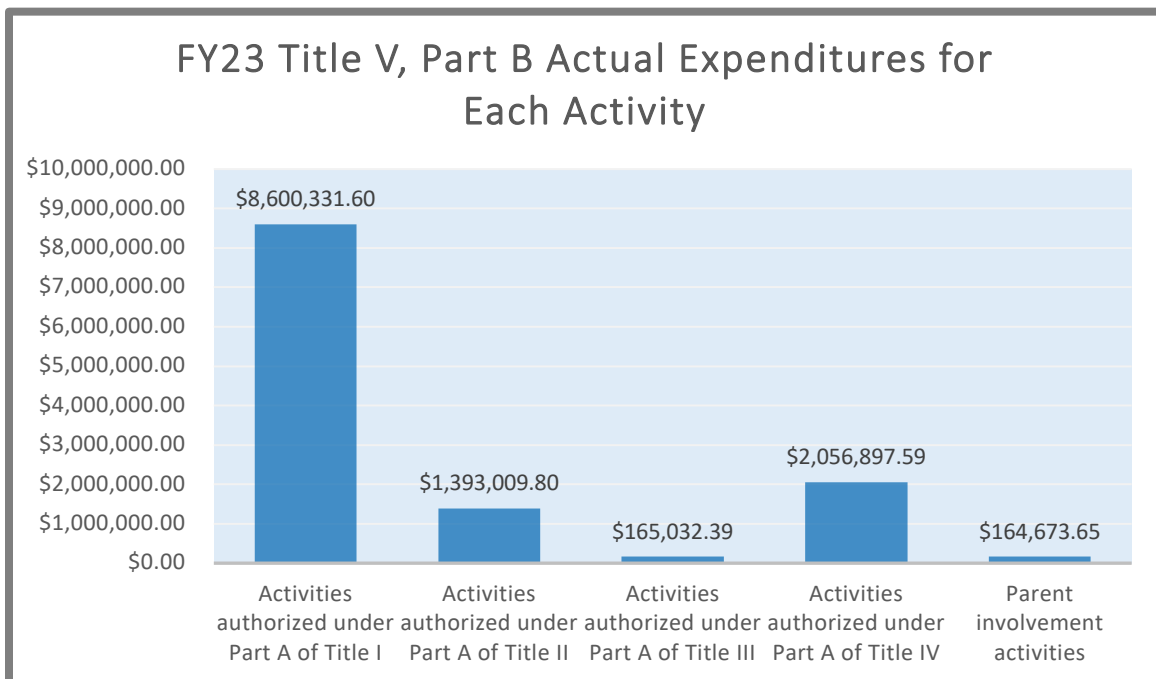
# 2022-2023 Title V, Part B Expenditures

Source: FY24 Annual Evaluation Report submitted by LEAs

Each LEA receiving Title V, Part B funds may choose to expend funds for any of the authorized activities under the allowed federal formula programs authorized under ESSA. Funds must supplement activities implemented in the district based on identified needs. At the end of each fiscal year, after submitting the Program Completion Report to Grants Accounting, districts must submit an Annual Evaluation Report indicating the activities for which the district expended funds, and the amount of funds expended for each activity or program. The following pie chart reports the percentage of RLIS districts participating in each of the allowed federal formula programs in FY23. It should be noted that many activities overlap across the federal programs for which Title V, Part B funds may be expended. For example, professional learning is allowable for more than one of the programs or activities, so an LEA may report this activity under Title I or Title II. The decision of where to report each activity is the decision of the district.



Each LEA reports the actual amount of funds expended for each authorized activity during the fiscal year. During budget development, the LEA reports the amount of anticipated expenditures for each activity, and after the fiscal year has ended the LEA reports the actual expenditures for each activity. The actual expenditures must align with the Program Completion Report submitted to Grants Accounting on October 30 of each fiscal year. The expenditures reported include the current year allocation plus any carryover funds from the previous year, and any funds transferred into Title V, Part B from either Title IV, Part A or Title II, Part A or a combination thereof. The chart below reports the amount of funds expended under Title V, Part B for each of the five authorized activities.



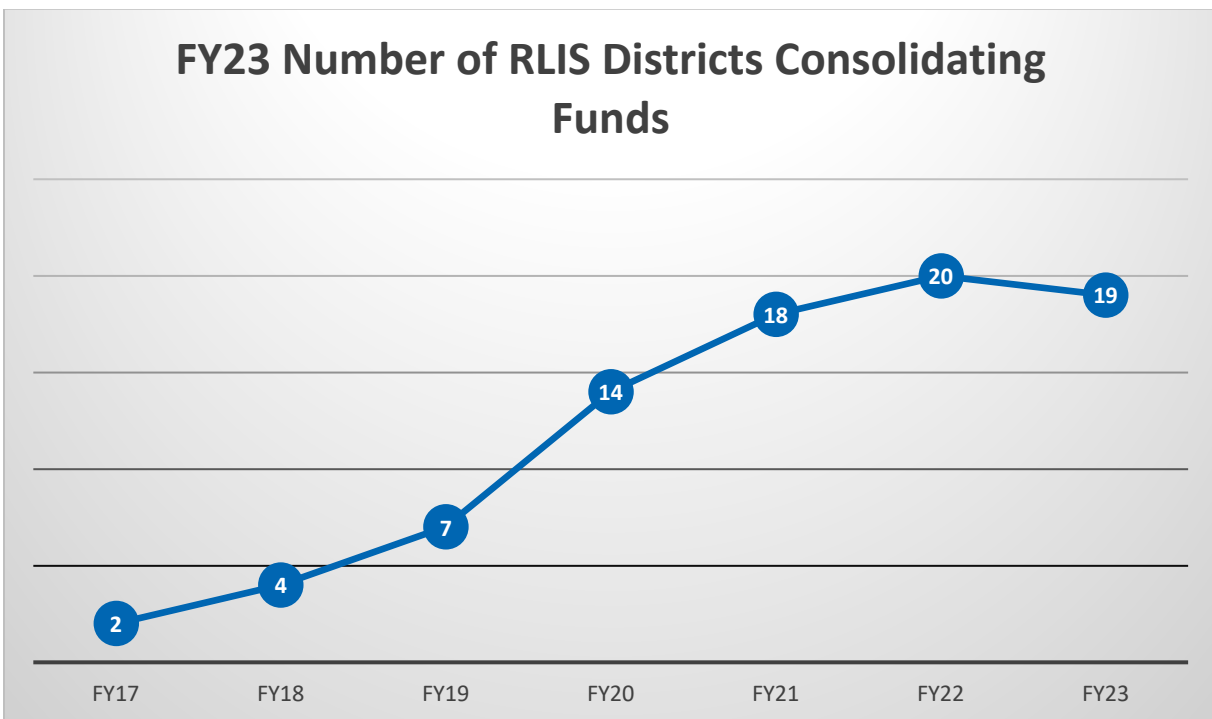
Source: FY24 Annual Evaluation Report submitted by LEAs

## Title V, Part B Consolidation of Funds

Under ESSA, LEAs are granted some flexibility in determining how they can best meet the needs of their LEA. This includes the ability to coordinate funds through a *traditional* budget, consolidate federal funds, consolidate federal and state funds or transfer funds into Title V, Part B.

**Consolidation:** Title I schools running a schoolwide program may choose to consolidate funds. By consolidating eligible federal funds in a schoolwide program, a school can more effectively design and implement a comprehensive plan to upgrade the entire educational program in the school as identified through a comprehensive needs assessment.

*Source: Consolidation of Funds Cohort Directory; Georgia Department of Education*



The chart above indicates how interest grows each year in Consolidation of Funds. Most of the RLIS districts who participated in consolidation chose to include Title V, Part B funds in the consolidation budget; however, some did not consolidate these funds and budgeted them outside of consolidation to fund district initiatives. Consolidating funds offers greater flexibility in meeting the academic needs of students.

## Title V, Part B Transferability 2022-2023

ESEA allows LEAs the flexibility to target eligible Federal funds to the programs and activities that most effectively address the unique needs of LEAs. The LEA may transfer all or any lesser amount of their Title II, Part A or Title IV, Part A allocations into Title V, Part B. Title V, Part B funds may not be transferred out and into another federal program. When funds are transferred into Title V, Part B, the funds become Title V, Part B funds and must adhere to the provisions in ESSA for the implementation of the Title V, Part B program activities and expenditure of funds. Title V, Part B allocations may be spent for activities authorized under certain federal formula programs as previously stated in this report, including Title II, Part A and Title IV, Part A.

Number of RLIS Districts Participating in Transferring Funds Into Title V, Part B	Title II, Part A Funds Transferred Into Title V, Part B	Title IV, Part A Funds Transferred Into Title V, Part B	Total Funds Transferred Into Title V, Part B
<b>25</b>	<b>\$2,520,685</b>	<b>\$2,568,532</b>	<b>\$5,089,217</b>

*Source: FY23 GaDOE Consolidated Application Transferability Report*

## Supplement Not Supplant

Title V, Part B funds must supplement and not supplant all local, state, and other federal funds. In general, when considering whether a proposed RLIS activity is supplemental, an LEA should determine whether it would have funded this activity with other federal, state, or local funds if no REAP funds were available. If the result of this determination is that no other federal, state, or local funds are available to fund the proposed activity, then the LEA may be able to use REAP funds for those activities, provided they are an allowable use of RLIS funds.

There are three situations when it will be presumed that supplanting has occurred:

- if the activity is one that would ordinarily be covered with other federal, state, or local funds (for example, in most cases, standard textbook purchases would ordinarily be covered with state or local funds),
- if the LEA previously funded the activity with other federal, state, or local funds, or
- if the activity is state-mandated or required by federal law (e.g., provision of certain services to English learners required by federal civil rights laws).

The burden of proof lies with the LEA in ensuring that no Title V, Part B expenditures are supplanting local, state, or other federal funds.

## Monitoring of Title V Part B

As the state pass through entity, GaDOE is responsible for overseeing the successful implementation of Title V, Part B in LEAs who receive an allocation and implement activities using RLIS funds. According to the Uniform Grants Guidance (2 CFR 200.328), monitoring by the non-federal entity must cover each program, function, or activity.

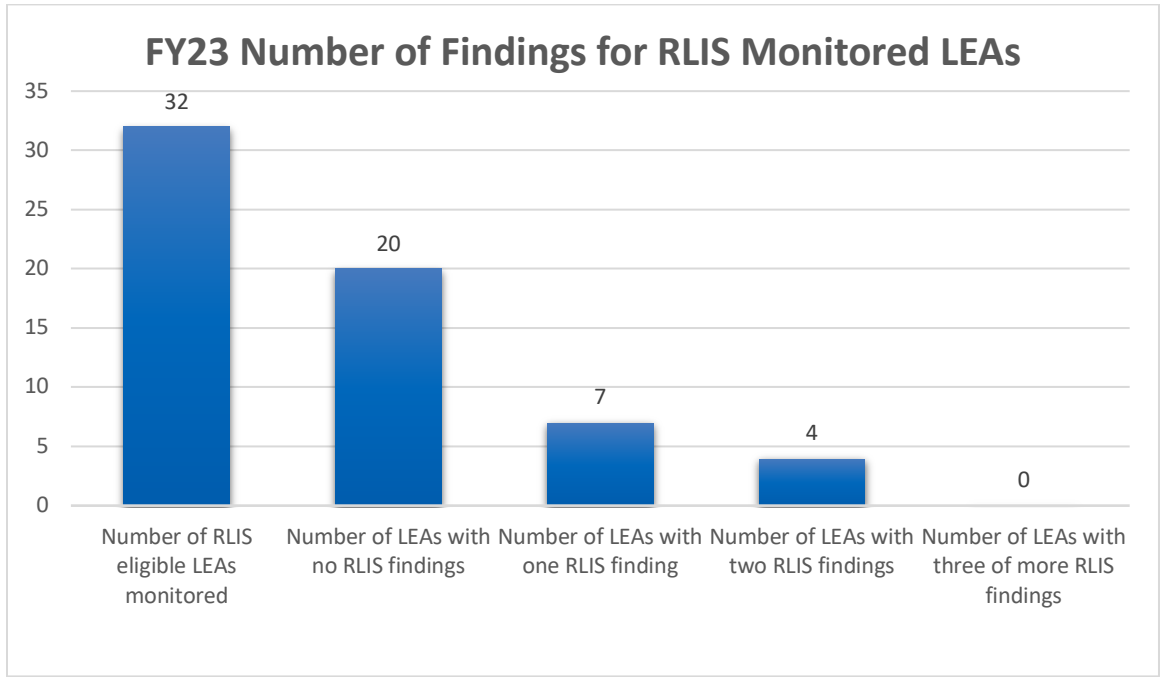
LEAs are monitored on a five-year cycle. As part of the annual review process in determining which LEAs are to be monitored, the Division of Federal Programs conducts a risk assessment using a combination of elements defined by GaDOE. An LEA's risk assessment rating is determined by using both its risk rating, based on a set of established High-Risk Elements developed by the Division of Federal Programs and a risk rating from GaDOE's Financial Review Division.

During the summer of each year, the Division of Federal Programs completes a risk assessment to determine if an LEA falls into the high-risk category. The results of the risk assessment determine which LEAs may be added to the regular CFM cycle for that year. The SEA has the responsibility to monitor high-risk LEAs (§ 200.331(b)(1-4)). The Division of Federal Programs defines high-risk as:

- LEAs showing evidence of serious or chronic compliance problems.
- LEAs with financial monitoring/audit findings; and/or LEAs with a high number of complaints from parents and other stakeholders about program implementation.
- Other elements that may cause an LEA to be determined high-risk include size of allocation and new federal programs or fiscal management personnel in the LEA.
- High-risk does not necessarily mean an LEA is not meeting the requirements of the program, federal regulations, or administrative procedures. It does mean that an LEA may be at a higher risk of having program elements that could cause it to not meet requirements associated with federal rules, regulations, and administrative procedures.

# 2022-2023 Title V, Part B Monitoring Findings

GaDOE monitors on a 5-year cycle and adds LEAs who are High Risk according to the annual risk assessment. The chart below addresses the FY23 Cross Functional Monitoring cycle. The most common areas for findings are in expenditures and written internal control procedures. GaDOE staff commonly find errors in internal controls and lack of supporting documentation that illustrate compliance with statute and applicable regulations.



Source: FY23 GaDOE Cross Functional Monitoring Reports

# Monitoring Analysis

Title V, Part B monitors districts for the following indicators:

1. LEA Monitoring of Programs
2. Consolidated LEA Improvement Plan (CLIP) and Schoolwide, Targeted Assistance Plans
3. Internal Controls, Expenditures, Inventory, Cost Principles, Drawdowns
4. Title V, Part B, Rural and Low-Income Schools Programs

Most findings centered around internal controls as evidenced by a lack of completeness and clarity in the written procedures in the LEA. Written procedures are essential to operating federal programs and to maintain compliance with federal law and regulations. Other findings included equipment management and cash management drawdown procedures. The districts all completed a Corrective Action Plan in response to the specific findings to revise and strengthen these procedures and the documentation maintained at the district as evidence of compliance with the law.