## Grant Management Best Practices

A Consultant's Perspective

## Single Audits and Governmental Accounting and Auditing Conference

Austin September 25-26, 2023



Grants Specialist ESSA, ESSER, State, & Federal Grants Comprehensive Needs Assessment Strategic Planning www.hinsleyassociates.com Phone: 903-474-3245

## Building a World Class Team





# TEA CEQS TASBO ACET Auditors



## Networking

Other Consultants

## 6 Common Problems of Managing Grants

1. Not Conducting a Thorough Comprehensive Needs Assessment

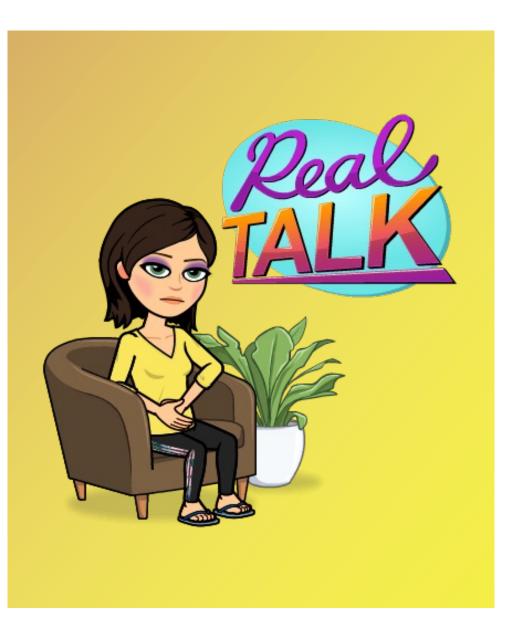
2. Lack of Communication

3. Failing to Allocate in the Local Finance Software

4. Forgetting to Add Carryover and Reallocation to the Local Budget

5. Lack of Updated Procedures

6. Not Spending Funds



## **Common Problems**

Not Conducting a Thorough Comprehensive Needs Assessment

Example: Regurgitating the TAPR.



Facilitate the Comprehensive Needs Assessment with all required stakeholders involved.





### **Required Stakeholders**

#### "District & Campus-Level Planning & Decision-Making Process"

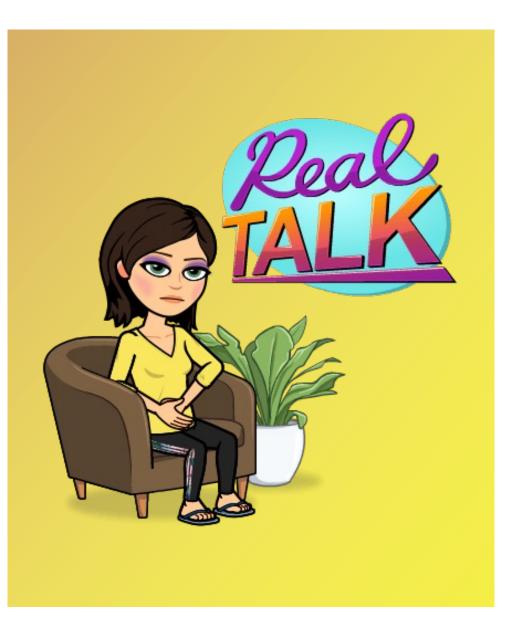
Documentation	Federal In addition to TEC requirements.	State - TEC 11.251 BQ Legal BQA Legal BQB Legal	Local Policy
<ul> <li>Notice of Meeting (or meeting invitation)</li> <li>Agenda</li> <li>Sign-in Sheet with signatures designating roles.</li> <li>Minutes</li> <li>Handouts</li> </ul>	<ul> <li>Students</li> <li><u>To the extent</u> <u>possible</u>, <u>stakeholders</u> <u>representing the</u> <u>interest of students:</u></li> <li>Tribes</li> <li>Civil Rights</li> <li>English learners</li> <li>Homeless</li> <li>Foster Care</li> <li>Migrant</li> <li>Incarcerated students</li> <li>Other underserved students</li> </ul>	<ul> <li>Parents (of Students enrolled in the district, and who are not employees of the district)</li> <li>Campus-level Professional Staff</li> <li>District-level Professional Staff</li> <li>Teachers (2/3 of the elected Professional Staff must be classroom Teachers)</li> <li>Staff Member responsible for working with Students with Disabilities</li> <li>Administrators</li> <li>Community Members representative of the district's diversity (at least 18 years of age and resides in the district)</li> <li>Business Representatives representative of the district's diversity (can be located in, or</li> </ul>	<ul> <li>BQ Local</li> <li>BQA Local (District)</li> <li>BQB Local (Campus)</li> </ul>

STEP 1: Engage with Stakeholders

#### PLANNING THE LOGISTICS

Careful attention must be given to planning so that participants will have a positive experience and achieve the objectives of the training. Throughout this guide, you will find checklists, handouts, and templates for your use. They are provided in a variety of formats: Word, PDF, and/or PowerPoint. A list of the **Tools for Download** is provided in the Appendix. They may also be downloaded at <u>www.hinslevassociates.com/cna-members</u>. Enter the password: CNA2023





## **Common Problems**

## Lack of Communication

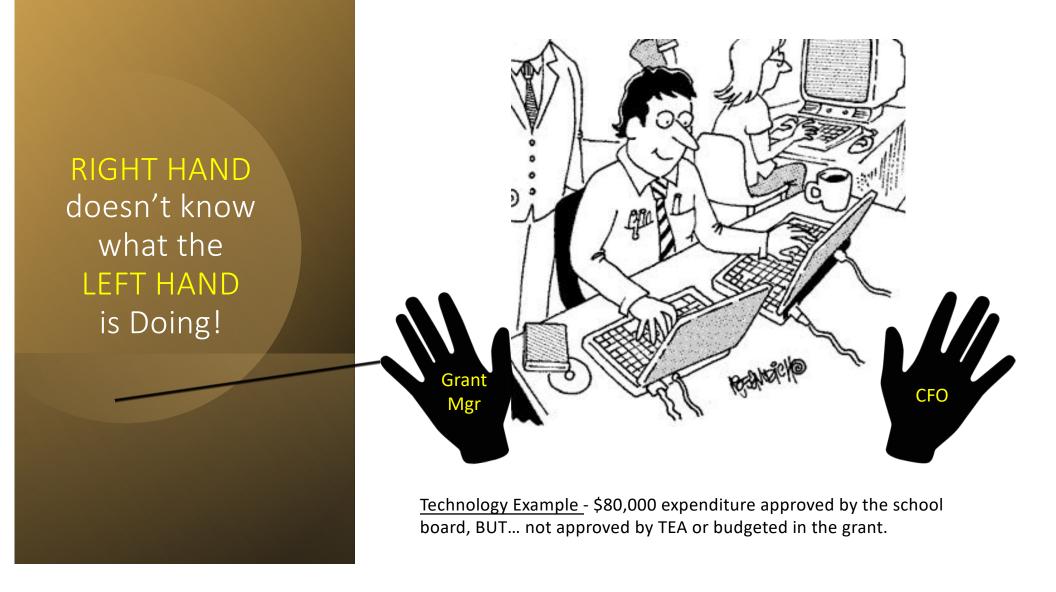
Example 1: Grant Manager makes a different plan than the Superintendent and/or CFO.

Example 2: Directors'/Principals lack access to viewing budgets.

### Time with the CFO









Google Drive 1-Pagers for Each Grant Folders for Each Grant Planning Meetings Collaboration Transparency



### COVID-19 Health Support Grant, Cycle 3

#### Fund 289 05/01/2021-03/31/2023

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#### **ALLOWABLE ACTIVITIES**

Direct & Indirect Costs Allowed

1. PPE (including but not limited to masks, gloves, gowns, & face shields)

2. Hygiene and cleaning supplies

3. Portable high-efficiency particulate air (HEPA) fan/filtration systems or other small items that may allow for improved air circulation

4. Public health events that include students and other community members and are aimed at providing opportunities APPLICATION DUE DATE Nov. 7, 2022

> LAST AMENDMENT Jan. 3, 2023

#### DOCUMENTATION

1. Update Needs Assessment

2. District Leadership Meeting: Item on Agenda, Sign-in Sheet, Minutes

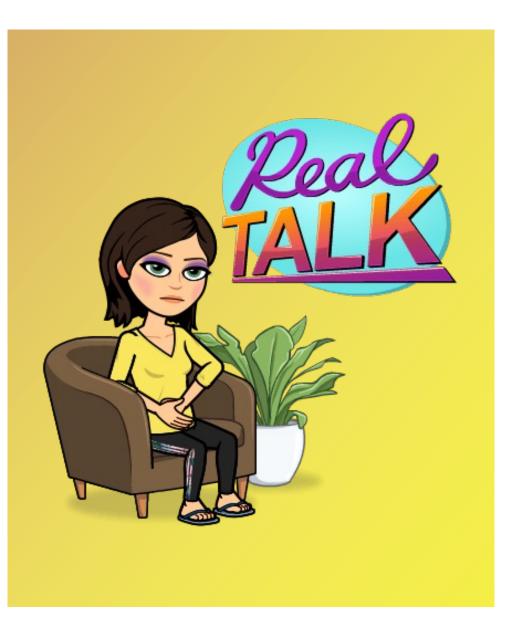
Name	$\uparrow$
	1-Contracts & Invoices
	2-APM-State & Federal Grants Manual
	3-Finance & Payroll
	4-Monthly "To-Do" Lists
	5-Documentation
	6-ESSER II
	7-ESSER III
	8-COVID-19 Health Support Grant 22-23
	9-SPAT Grant
	10-School Safety Standards Grant
	11-SAFE Grant
	2019-2021 Instructional Continuity Grant
	Title IV Compliance
	USDE ESSER Annual Report
POF	eGrants Checklist.pdf

State Fiscal Report TEMPLATE

## Google Shared Drive

### Files for Each Grant

Name	<b>↑</b>
	Compliance Reports-Health Grant
۲	Agenda_10-24-22_COVID-19 Health Grant Mtg
ŧ	Budget Setup-COVID-19 Health Grant, Cycle 3
PDF	COVID-19 Health Grant, Cycle 3 Infographic.pdf
8	Minutes_10-24_Health Grant Mtg
8	Sign-in Sheet_10-24-22_Health Grant Mtg
PDF	Signed_COVID-19 Health Support Grant Agreement.pdf



## **Common Problems**

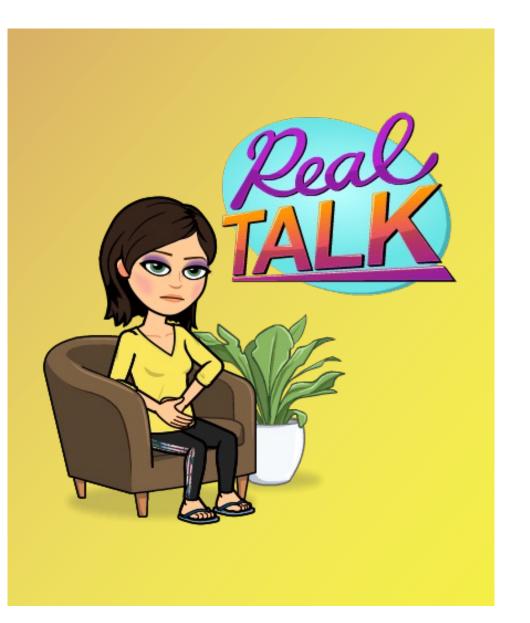
Failing to Allocate in the Local Finance Software

Example: Budget not entered because it was not communicated to the CFO in the expected format.



Provide Budget Setup Template with Funding Codes. Send grant budget schedule to CFO.

File Edit View Insert Format Data Tools Extensions Help													
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							610	0 Pay	vroll				
;	Allowable activites: Sala Items 1-6 in dropdown list. (SUPPLANTING IS ALLO			•			ate secur	ity office	ers, scho			ed activities h	ave been met first. See
5	6100 (Payroll) (List POSITION & # of FTEs)	FUND	FUNCT	OBJECT	LOCAL OPTION CODE (XX)	ORG	FISCAL YEAR Pre-Award 2023-24 (4) 2024-25 (5)	PROG INTENT	LOCAL OPTION CODE (X)	LOCAL OPTION CODE (XX)	Amount Budgeted	Amt. budgeted to Pre-Award Allowed from Oct. 27, 2022 to Stamp-in Date	ALLOWABLE ACTIVITY Select # (1-11) from dropdowr list below. (Items 1-6 are required to meet minimum compliance with Safety Standards. Once met, funds can then be used for Items 7-11.)
	District Peace Officer (FTE=1)	429	52	6100	0	999	4	99	0	00	\$64,300	\$0	9. district peace officers, private security officers, school marsha
	TOTAL Budgeted tor 6100										\$64,300	\$0	
					62	200 (	Conti	racte	d Sei	rvice	S		
)	Allowable activities: See Dr (SUPPLANTING IS ALLOWE			t be one								-	
1	6200 (Contracted Services) (List Vendor Names)	FUND	FUNCT	OBJECT	LOCAL OPTION CODE (XX)	ORG	FISCAL YEAR Pre-Award 2023-24 (4) 2024-25 (5)	PROG INTENT	LOCAL OPTION CODE (X)	LOCAL OPTION CODE (XX)	Amount Budgeted	Amt. budgeted to Pre-Award Allowed from Oct. 27, 2022 to Stamp-in Date	ALLOWABLE ACTIVITY Select # (1-11) from dropdown list below. (Items 1-6 are required to meet minimum compliance with Safety Standards. Once met, funds can then be used for Items 7-11.)
2	VENDOR is Nantze. Equipment name is Verkada.	429	52	6299	0	999	4	99	0	00	\$85,700		7. security cameras and equipment
	VENDOD is Nontro												6)other required rule components around emergency



## **Common Problems**

Forgetting to Add Carryover and Reallocation to the Local Budget

Example: Grant manager amends the grant but forgets to notify the CFO – B/ESL Program.



H&A monitors the grant, completes amendments as needed, including carryover and reallocation. Update Budget Setup Template. Send updated grant budget schedule to CFO. 2022-2023 ESSA Consolidated Federal Grant Application

( Instructions

Program Budget BS6001 - Program Budget Summary and Support

Statutory Authority: Elementary and Secondary Education Act of 1965, as amended by Every Student Succeeds Act

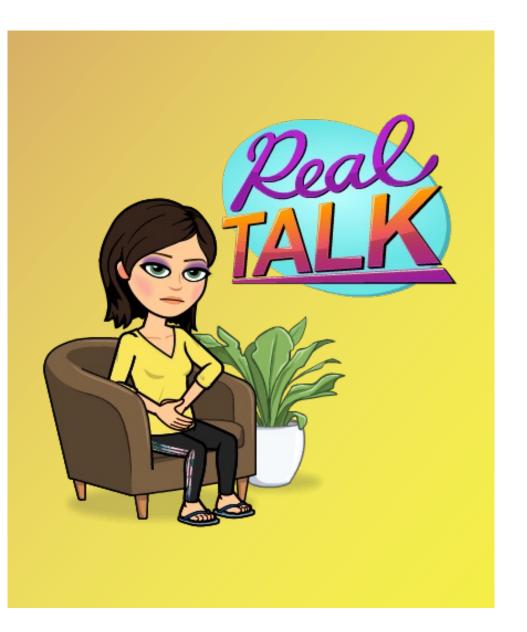
#### Part 1: Available Funding

View List of SSA Members

Available Funding								
Description	Title I, Part A	Title I, Part C Migrant	Title I, Part D Subpart 1	Title I, Part D Subpart 2	Title II, Part A	Title III, Part A ELA	Title III, Part A Immigrant	Title IV, Part A - SSAEP
1. Fund/SSA Code	211				255			289
2. Planning Amount								
3. Final Amount	\$358,843				\$59,231			\$25,746
4. Carryover	\$0				\$17,034			\$11,210
5. Reallocation	\$3,942				\$6,702			\$3,868
Total Funds Available	\$362,785				\$82,967			\$40,824

#### Part 2: Budget Summary

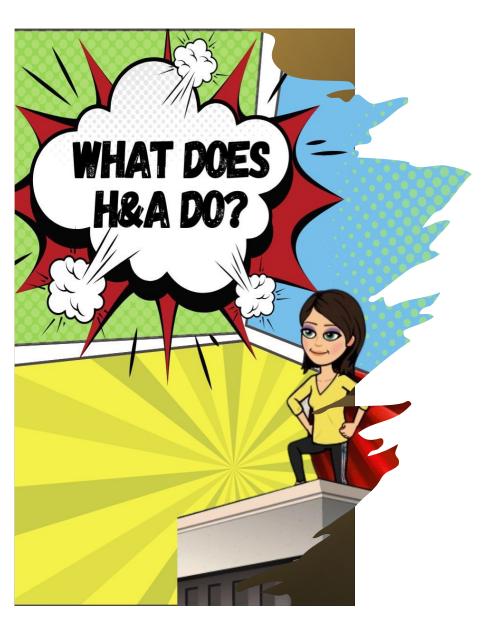
A. Budgeted Costs									
Description	Class/ Object Code	Title I, Part A	Title I, Part C Migrant	Title I, Part D Subpart 1	Title I, Part D Subpart 2	Title II, Part A	Title III, Part A ELA	Title III, Part A Immigrant	Title IV, Part A - SSAEP
1. Consolidated Administr Funds	ative	🔿 Yes 🔾 No	Yes No	Yes No	Yes No	🔿 Yes 🔾 No	Yes No	Yes No	🔿 Yes 🔾 No
2. Payroll Costs	6100	\$290,580				\$82,967			\$40,824
3. Professional and Contracted Services	6200	\$70,405							
4. Supplies and Material	6300	\$600							
5. Other Operating Costs	6400	\$1,200							
6. Debt Services	6500								
7. Capital Outlay	6600								
8. Operating Transfers Out	8911								
Total Dire	ect Costs	\$362,785				\$82,967			\$40,824
9. Indirect Costs									
Total Budge	ted Costs	\$362,785				\$82,967			\$40,824
Total Funds Available Minus Total Costs		\$0				\$0			\$0
10. Payments to Member Districts of SSA	6493								



## **Common Problems**

Lack of Updated Procedures

Examples: APMs not updated / not matching local TASB policy / not knowing local policy; No SNS (Title I, Part A) documentation.

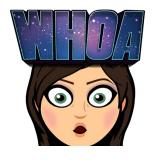


Assist with updating the APM.

Provide Timelines, Templates, Checklist to assist with internal processes.

### Administrative Procedures Manual

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13. EMPLOYEE SHALL SERVE A PROBATIONARY PER. District of Anobation	18/11
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THE EIGHT YEARS OF OURSE IN PUBLICE IN STRAG OF FORTIGH	
BOARD'S DECISION TO TERMINATE THE EMPLOYM THE CONTRACT TERM SHALL BE FINAL AND NAY 8 years in TY,	<u>i</u>
3/13/01 Legal Springs-TASB- Paul Liks Some one who has taught 5 of the 3/13/04 Baskin isn't	Prof
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contract only must be the the 1st 3/15/04 10: Ramey	prof
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Note to Self: Don't act shocked!

### TEMPLATES

Name	<u>↑</u>
	1 - Ads & Notices
	2 - CNA - Comprehensive Needs Assessment
	3 - Local Policy (Public Notice; Translation)
	4 - SCE - State Comp Ed
	5 - Title I (SNS Exemption; Annual Mtg)
	6 - ESSER
	7 - Monthly Tasks
	CIP Checklist
	Professional Development
E	MAKE A COPY

#### **TEMPLATE ISD**

Every Student Succeeds Act (ESSA) Title I A, Program

#### Supplement/Not Supplant Compliance Requirement

Under ESSA Title I, Part A, the district must demonstrate a Supplement/Not Supplant Methodology that is used to allocate State and Local funds to campuses and that the allocation process is equitable.

#### Title | Part Statute:

#### Section 1118 (b)(1)

All LEA shall use Federal funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under this part, and not to supplant such funds.

#### TEA Guidance on Supplement/Not Supplant

Based on TEA guidance, districts who have 1 campus per grade span with no duplication of grades, will not be required to demonstrate a methodology for Supplement/Not Supplant.

MY DISTRICT ISD will not be required to demonstrate a methodology for Supplement/Not Supplant because the district has 3 campuses with no duplication of grade spans.

- MY DISTRICT High School Grades 9-12
- MY DISTRICT Junior High School, Grades 6-8
- MY DISTRICT Elementary Grades Pre-K-2

Printed Name of Authorized Official

Title

Date

Signature of Authorized Official

### Supplement Not Supplant (SNS) Exemption

Additional Flexibility for Title I, Part A

Taken from TEAs Supplement Not Supplant Handbook,

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**Question 22**: If the LEA has an SNS methodology that allocates its State and local funds so that all of its campuses receive the State and local funds they would receive in the absence of Title I, Part A funding, are the campuses then allowed to spend Title I funds on things that may violate the "traditional" presumptions of supplant?

**Response**: Yes. The Title I, Part A statutory SNS Methodology replaces the "traditional" presumptions of **supplant** as a way of demonstrating compliance with the SNS requirement. Therefore, if the LEA has an SNS methodology that has all of the required components included and ensures all of its campuses receive the State and local funds they would receive in the absence of Title I, Part A funding, then the campuses have met the SNS requirement. No further SNS demonstration is required for those campus-level funds. **The LEA should keep in mind that all Title I expenditures must still be for activities that**—

•support a need that is identified in the Comprehensive Needs Assessment;

•are included in the Campus Improvement Plan;

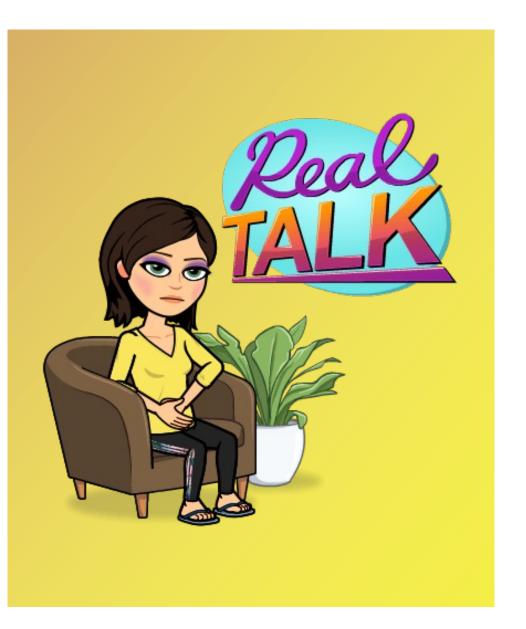
•are reasonable in cost;

•are necessary to carry out the intent and purpose of the Title I, Part A program;

•are allocable under the grant; and

•are allowable under Title I, Part A.

The LEA must ensure that the expenditures meet all EDGAR requirements and that all district policies and procedures are followed.



## **Common Problems**

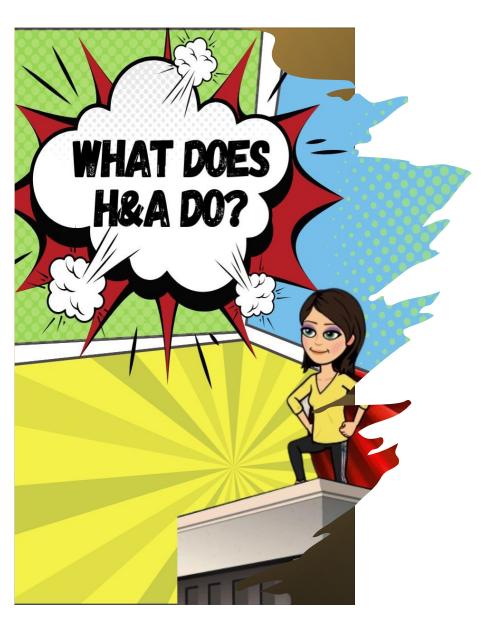
## Not Spending Funds

Examples: Lots of reasons why !!

## Not Spending Funds

- Staff leave mid-year and not replaced
- Not communicating with Dept. Heads or Principals regarding funds available
- Procedures so restrictive funds cannot be utilized (procurement/approved vendors)
- P.O.s being denied because funds were not set up in the local finance software
- I paid for that. No wait! You paid for that!
- Other reasons





Communicate regularly with CFO/grant contacts.



- Sept. 1 (Perkins V) Perkins V: Strengthening Career and Technical Education for the 21st Century Grant Application DUE!
- Sept. 1 (ESSA) ADC & Consolidated Federal Grant Application DUE!
- Sept. 13 (Title I, 1003) School Improvement Grant Application OPENS!
- Sept. 15 (RLIS) 2023-2024 Rural & Low-Income Schools ADC/eGrant Application OPENS!
- Sept. 15 (Indirect Cost Rate) Survey DUE! See Aug. 22, 2023 TEA Bulletin.
- Sept. 21 (SAFE Grant) Safety & Facilities Enhancement Grant Application DUE!
- Sept. 26 (Accountability) 2023 Accountability Ratings Published (TEAL).
- Sept. 28 (Random Validations for 22-23) ESC technical assistance deadline if LEA receives "Improvement Needed" status regarding any items.
- Sept. 29 (ESSA) 2022-23 Consolidated Compliance Report DUE!
- Sept. 29 (RLIS) 2022-23 Rural & Low-Income Schools Compliance Report DUE!
- Sept. 29 (Random Validations for 22-23) If the LEA receives "Improvement Needed" status on a program requirement, the LEA will be required to submit documentation for 2023-2024 for the same requirement. The documentation must be submitted in the FPC RV WorkApp System.

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- Sept. 30 (CRSSA/ESSER II) End of performance period for CRRSA ESSER II funds, last day to obligate funds. Sept. 30 - CARP/ESSER III) NOGA End Date before Carryover.

#### H&A WILL:

- Complete the 2022-2023 ESSA Consolidated Compliance Report.
- Complete the 2022-2023 RLIS Compliance Report (if applicable).
- Provide Annual Title I, Part A Meeting Powerpoint (if requested).
- Assist with 2023-2024 ESSA/RLIS Budget Setup.
- Complete the 2023-2024 RLIS Grant Application (if eligible).
- Amend grants, if needed.
- Assist with audits

#### THE LEA WILL:

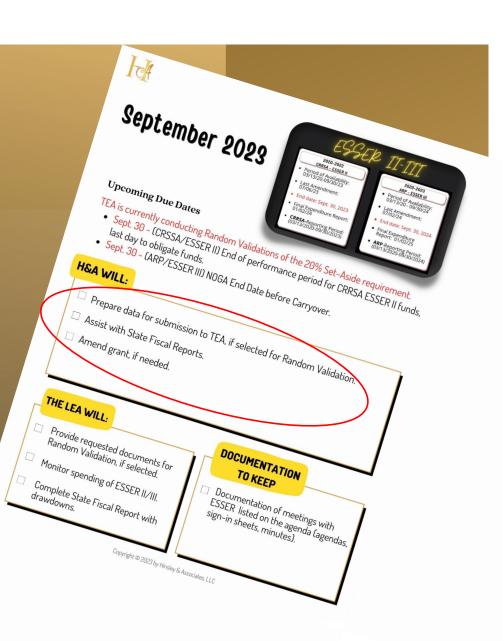
#### Notify parent/guardian IF the school district has assigned an inappropriately certified or uncertified teacher to the same classroom for more than 4 consecutive weeks. ESSA Section

- 1112 (e)(1)(B)

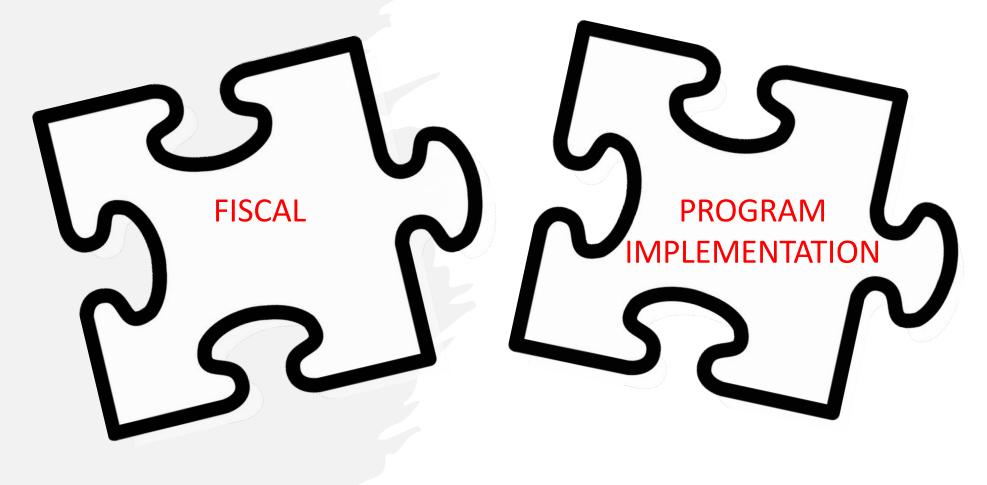
- Review the requirements for Parent & Family Engagement. There are separate requirements for the LEA -vs- Campus Genool levels. Add ID&R and PFS Action Plans for Migrant to the District
- Improvement Plan as an appendix. (If part of a SSA, check with the Service Center.
- Keep documentation of meetings with name of grant on the agenda, sign-in sheets, minutes, etc.

#### **CAMPUS WILL:**

Conduct Annual Title I Meetings. Conduct Parent & Family Engagement training. Distribute district and campus Parent & Family Engagement policies. Distribute School-Parent compacts. Conduct Parent-Teacher Conferences where schoolparent compacts are discussed (required at the elementary level). ESSA Section 1116 (d) (2)(A) Make campus plans available to parents and familie



## Types of Monitoring



## Types of Monitoring

### 1. Local Audit

- 2. TEA Fiscal Reports
- 3. USDE Annual Reports (B.A.R.)
- 4. Single Program Audit Local Auditor
- 5. Single Program Audit TEA
- 6. Random Validations
- 7. Compliance Reports
- 8. Special Collections

## Types of Monitoring



Random Validation Process	2022-2023	2023-2024				
Number of Requirements Selected per Program	<ul> <li>Title I, Part A = 3 Requirements</li> <li>Title I, Part A = Supplement, Not Supplant (SN</li> <li>Title I, Part C = 3 Requirements</li> <li>Title I, Part A = 3 Requirements</li> <li>Title IV, Part A = 3 Requirements</li> <li>Title IV, Part A = 3 Requirements</li> <li>Title V, Part A = 3 Requirements</li> <li>Title V, Part A = 3 Requirements</li> <li>EdFlex - Title I, Part A Schoolwide Eligibility W</li> <li>Private School Equitable Services (PNP) = 4 Re</li> <li>Unsafe School Choice Option (USCO) = 1 Requirements</li> </ul>	aiver = 1 Requirement quirements				
Random Selection of LEAs*	<ul> <li>For the "Big 4" random validations (Title I, Part A; Title I, Part C; Title II, Part A; and Title IV, Part A), we will not select from the LEAs selected for random validation in the previous year.</li> <li>For all non-"Big 4" random validations, the LEAs selected for random validation in the previous year could be selected for random validation in the new year.</li> <li>LEAs selected for RLIS may be selected for up to 2 random validation in the same year.</li> </ul>					
LEA Notification of Selection	Phase 1: Early October Phase 2: Late November Method of Notification: Email from FPC RV Work/ Contacts and Corresponding ESC Contacts	App System to FPC RV WorkApp System				
ESC Technical Assistance and Support Timeline	Phase 1: 2 weeks Phase 2: 2 weeks					
LEA Documentation Submission	LEAs submit documentation in FPC RV WorkApp S	ystem				
LEA Documentation Submission Timeline	Phase 1: 2 weeks; Mid-October Phase 2: 2 weeks; Mid-December					
TEA Documentation Review Timeline	Phase 1: 14 weeks Phase 2: 6 weeks	Phase 1: 13 weeks Phase 2: 6 weeks				
LEA Notification of Results	Mid-March: Email from FPC RV WorkApp System Corresponding ESC Contacts	to FPC RV WorkApp System Contacts and				
Resources	<u>Random Validation Resources Webpage</u> O Program-Specific Random Validation Handbooks     Process Overview Recorded Training Video & Training Slides     Program-Specific Random Validation Recorded Training Videos & Training Slides					

\*Subject to change based on number of LEAs available for selection.

Federal Program Compliance Division

Random Validation Process Comparison: 2022-2023 & 2023-2024

V1.0 07/06/2023 2

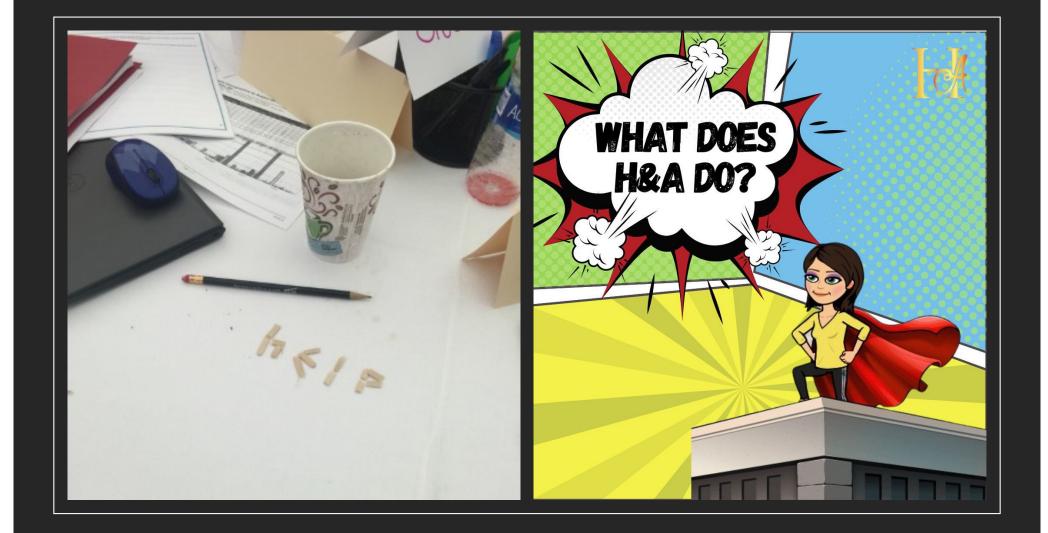
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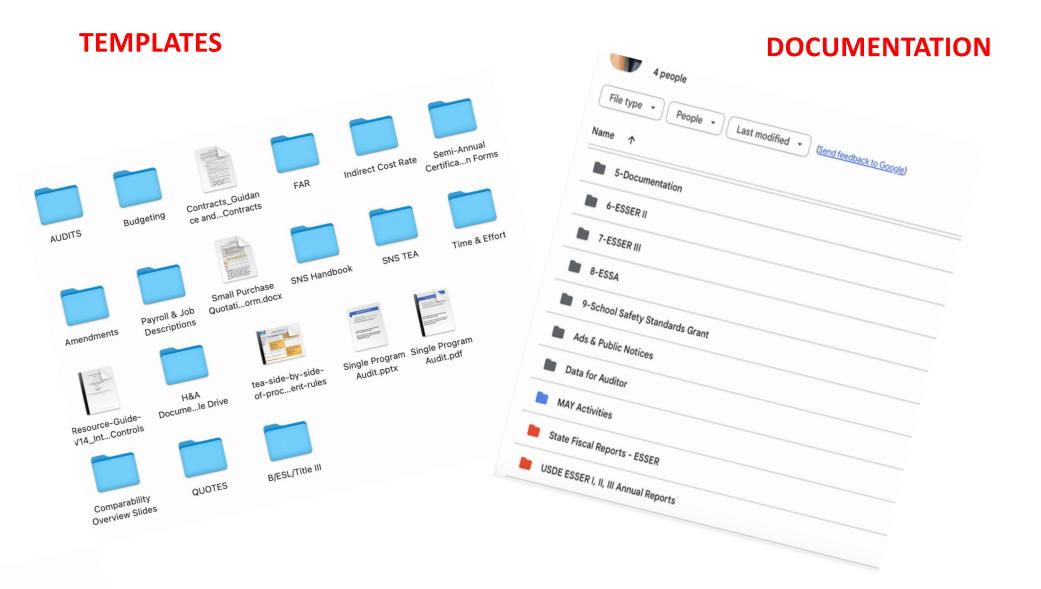
Federal Program Compliance Division



#### Random Validation Process Comparison: 2022-2023 & 2023-2024

Random Validation Process	2022-2023	2023-2024
Programs Selected for Monitoring	Title I, Part A – Improving Basic Programs     Title I, Part A – Supplement, Not Supplant (SN     Title I, Part C – Education of Migratory Childre     Title I, Part D – Prevention and Intervention fc     Title II, Part A – Student Supporting Effective Instructic     Title V, Part A – Student Support and Academ     Title V, Part B – Rural and Low-Income School:     EdFlex – Title I, Part A Schoolwide Eligibility W     Private School Equitable Services (PNP)     Unsafe School Choice Option (USCO)	n (MEP) r Delinquent, Neglected, and At-Risk Youth m ic Enrichment s Program (RLIS)
2-Phase Process	Phase 1 Programs     Original Part A     Title I, Part A - Supplement, Not Supp Phase 2 Programs     EdFlex - Title I, Part A Schoolwide Elig     Title I, Part D     Title V, Part B     Private School Equitable Services (PNI     Unsafe School Choice Option (USCO)	ibility Waiver
Number of LEAs Selected	<ul> <li>Title 1, Part A = 60 LEAs (12 LEAs from 5 ESCs)</li> <li>Title 1, Part A – Supplement, Not Supplant (SNS) = 40 LEAs (2 LEAs from each ESC)</li> <li>Title 1, Part C = 54 LEAs (LEAs (LEAs from 5 ESCs)</li> <li>Title 1, Part D = 20 LEAs (Randomly selected from across the state, regardless of ESC)</li> <li>Title 1, Part A = 45 LEAs (up to 12 LEAs from 5 ESCs)</li> <li>Title 1, Part A = 45 LEAs (up to 12 LEAs from 5 ESCs)</li> <li>Title 4, Part A = 50 LEAs (Randomly selected from across the state regardless of ESC)</li> <li>Title 4, Part B = 28 LEAs (Randomly selected from across the state regardless of ESC)</li> <li>EdFlex – Title 1, Part A Schoolwide Eligibility Waiver = 5 LEAs (Randomly selected from across the state, regardless of ESC)</li> <li>Private School Equitable Services (PNP) = 23 LEAs (2 LEAs from each ESC, if applicable)</li> <li>LEAs (2 LEAs from each ESC, if applicable)</li> </ul>	TBD based on ESSA Consolidated Application Data
Random Validation Process	s Comparison: 2022-2023 & 2023-2024	V1.0 07/06/2023 1





### 



#### TEA Compliance Reports:

- ESSA Consolidated Compliance Report
- Gun-Free Schools Report
- Title IV, Part A Data Collections
- Rural & Low-Income Schools Compliance Reports

#### ESSER Grants Reporting

- Justification Forms
- Prior Approval Forms
- USDE ESSER Annual Reports
- TEA ESSER Fiscal Reports
- RIPICS & Use of Funds Plans

#### TEA Random Validations Monitoring the past two years: ESSER II

- 2 LEAs- How the LEA determined needs caused by COVID-19
- 2 LEAs- How the LEA Prioritized Needs in Determining the Use of the ESSER II Grant Funds

#### ESSER III

• 4 LEAs- 20% Set-aside to Address Learning Loss

#### **Best Practices for Administering a Grant**

The following strategies support effective grant management.

	Expand Al
Get organized early with a management plan.	•
Identify all administrative responsibilities.	▼
Have clear, written policies and procedures.	▼
Use a system of checks and balances and dual sign-offs for fund requests.	•
Revisit the grant's program guidelines and calendar dates regularly.	▼
Request payment regularly and accurately.	▼
Get prior approval before conducting activities that specifically require it.	•
Maintain good financial and programmatic records, as well as documentatio and submit timely reports.	on, ▼
Monitor activities and records.	•
Amend the application if changes are needed.	▼
Respond quickly to corrective action and audit resolution requirements.	•
Seek support from your regional Education Service Center (ESC).	•
Contact the appropriate TEA division as early as possible should there be an concerns or problems.	y 🔹

## Grant Management Best Practices

## from TEA's Website

## We Do Better When We Know Better







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www.hinsleyassociates.com



