# PELL Meeting May 9, 2019



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# Keeping your Title III Application Revision from becoming a search and rescue mission

### **Session Goals:**

- To increase participant understanding of the need for application revisions
- To improve efficiency of the application revision process





### Ground zero

### What Is Your Role?

Raise your hand if...

...you are responsible for completing the work in GME

...you are responsible for completing the work in ALEAT/IAP

### **Revision Pre-Test**

How many revisions are allowed each fiscal year?

How much carryover does Title III allow?

How much can LEAs spend on direct administrative expenses?

How much can LEAs budget for indirect costs?

Are application revisions allowed during the completion report process?





### Requirements

### EDGAR 2 CFR 200.308 (b)

 Recipients are required to report deviations from budget or project scope or objective, and request prior approvals from Federal awarding agencies for budget and program plan revisions, in accordance with this section.

### Title III Part A Sec. 3116(a-b)

• Each eligible entity desiring a subgrant from the State educational agency under section 3114 shall submit a plan to the State which describes the effective programs and activities implemented to assist English learners and promote parent and family engagement in the education of English learners.



## Original Application vs Revision

### Consider the timeline

- Original Application = a plan for spending
- Plans may change throughout the school year

Grant applications are fluid; Unlimited Application Revisions track the changes until the project end date or completion report is initiated; Completion Reports memorialize your expenditures

Expenditures at Completion Report time MAY be disallowed if not evidenced in the approved grant application





# WHY Revise an Approved Application

WHEN to Revise an Approved Application

## **Scenarios Creating Mandatory Revisions**

FINAL Allocation announcement

Incoming carryover (ALL unspent previous year funds)

Addition of new consortia members

**Indirect Cost Rate approval** 

Maintenance of Effort (MOE) reductions

Transferability adjustments



### Scenarios for LEA-initiated Revisions

Dollars allocated in the budget differ from actual expenditures (Fiscal change)

Previously approved activity or service has changed or will be eliminated (Programmatic change)

NEW activity or service will be added (Programmatic change)





# WHY Revise an Approved Application WHEN to Revise an Approved Application

HOW to Revise an Approved Application



Even with a mountain of information, sometimes we need to bring in the dogs



### LEA Integrated Action Plan (LIAP)

### **REMEMBER: Needs come before the funds**

A new or revised need has been identified

- Create a new strategy and action step -OR- Revise an existing strategy and action step
- Add appropriate Title III funding tag (tags are specific to fiscal year)
- Extend dates for LIAP Action Steps, as needed

Include sufficient, yet concise, details to fully describe the activity or program

- Eliminate unnecessary fiscal information (dollar amounts, quantities, etc.)
- Explain how the activity improves outcomes for ELs
- Provide details to confirm supplement not supplant (SNS)



## **Funding Application**

Needs are identified – let's add the money!

RECOMMENDED: Preserve the narrative from the ORIGINAL Application

Be economical with your words

Call attention to the change

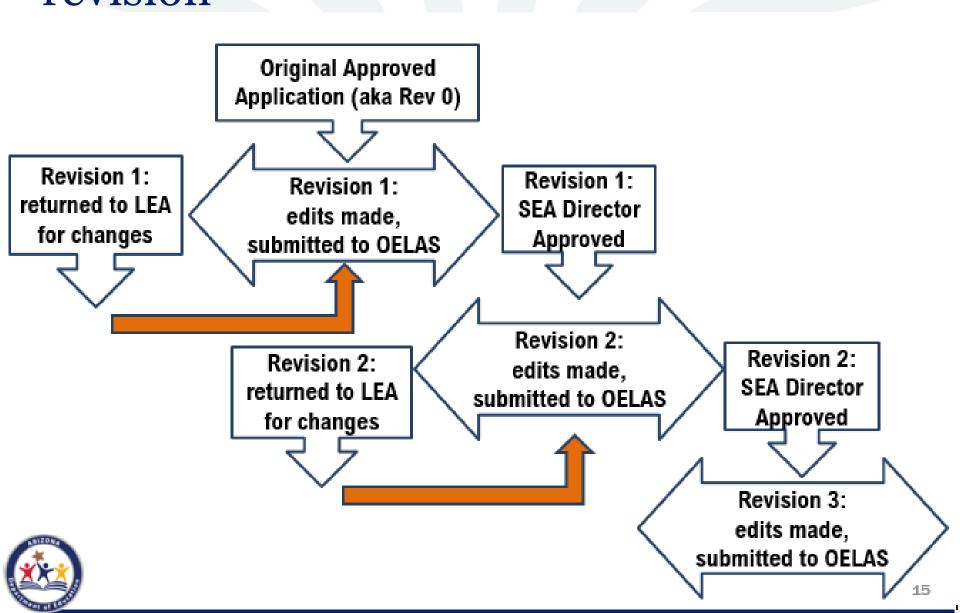
- Clearly label the revision number
- Use different font color or highlight the revision

Double-check the math

Comply with USFR coding



# Resubmissions are not the same as a new revision



# Sample Narrative #1

Object Code	Function Code	Project Time (FTE)	Quantity	Salary, Rental,or Unit Cost	
6100 - Salaries	1000 - Instruction		1	\$65,238.56	\$65,238.56

### Narrative Description

Annual salaries @ 70% each for 5 HQ EL Instructional Associates. EL Instructional Associates support instruction by working with identified EL students under the direct supervision of a highly qualified EL classroom teacher.

1 @ \$ 10,248.51 1 @ \$ 10,875.82

1@ \$ 11,540.91

1@\$11,540.91

1@\$13,256.56

Total cost = \$ 57,462.71

### Revision #2:

- Increase of \$7,775.85 to add an additional EL Instructional Associate.
- This is a part-time staff member.
- This is a new position in the district.
- No previous funding has been used to fund this position.

EL Instructional Associate support by working exclusively with identified EL students under the direct supervision of a highly qualified EL certified teacher at \$7,775.85.

Adjusted total = \$57,462.71 + \$7,775.85 = \$65,238.56



# Sample Narrative #2

Object Code	Function Code	Project Time (FTE)		Salary, Rental,or Unit Cost	
6500 - Other Purchased Services	2300,2400,2500,2900 - Support Services (General, School, Central Services, Other)		1	\$963.00	\$963.00

### Narrative Description

(\$912.00) Funds to supplement travel and related costs for the Grant Coordinator, Principals, and EL Coordinator to attend professional development training for the purpose of ensuring program compliance with Title III guidelines. These expenditures shall be used exclusively for Title III Coordinators to attend training specific to English Learners' academic needs and Title III compliance, e.g., EL Coordinator Boot Camp and Practitioners of English Language Learning (PELL) training.

Mileage reimbursement for professional development paid for by Title III will be reimbursed at the IRS approved rate; hotel and per diem costs will be paid based on state guidelines and hotel availability.

(See LEA Integrated Action Plan - Principle 1)

### Revision 1 (10/16/18):

Decreased funding for travel and related costs by \$34.00 to reflect actual costs. Moved \$34.00 to 6300-2500. New Total: \$878.00

### Revision 2 (3/15/19):

Increased funding for Admin travel and related costs by \$85.00 to supplement expenses.

New Total: \$963.00



# Alignment

Ensure every funding request has a correlated action step and Title III funding tag in the LIAP

Ensure alignment with the GME narratives and detailed LIAP descriptions

Make sure when you summarize for GME, the message stays the same

Review comprehensive LIAP details to identify all programs/services/ materials being provided across all funding sources to ensure SNS for Title III





WHY Revise an Approved Application



WHEN to Revise an Approved Application



HOW to Revise an Approved Application



# Looking for the Feedback



## SEA Specialist Returned Not Approved

Start with the History Log (HL)

Look for fiscal and programmatic feedback from application review

Make all changes and/or provide clarification based on OELAS feedback

If requested to post a comment in the HL, make sure to check the box on 'Create Comment' page and select your Regional Specialist as the recipient

Call OELAS for assistance if feedback is unclear

REMEMBER: Keeping the details in the LIAP reduces or eliminates the need for applications to be returned



## Don't lose the treasures in your revision!

PD and Parent Engagement must still be included

New expenditures must meet SNS criteria

Expenditures must be reasonable, allowable and allocable





### Help is out there!



# There is a wealth of information in Title III section of the OELAS website

http://www.azed.gov/oelas/title-iii/

### Contact us for help

Main Line 602.542.0753

Title III Fiscal Specialist 602.542.0794

**OELAS** Regional Specialists



# THANK YOU!



