

Title I COVID-19 Frequently Asked Questions (FAQ)

<https://achieve.lausd.net/Page/16662>

AS of August 21, 2020

Below are frequently asked questions about the Title I program and the use of funds during the COVID-19 period. Please check back often as these FAQs may be updated as we move forward during this period. Previous versions of the FAQs no longer applicable have been removed or revised. Ensure that the followed practice is based on the most current FAQs posted. Frequently Asked Questions Categories:

Title I Purchases: FAQ 1-5

School Site Council Approval: FAQ 5-7

School Plan for Student Achievement (SPSA): FAQ 8-9

Time and Effort Documentation for Professional Development (PD), Intervention: FAQ 10-15

Repurposing Federal Equipment and Supplies for COVID-19 Distance Learning: FAQ 16

(In light of the UTLA-LAUSD Side Letter for COVID-19, please check with your Staff Relations or the Office of Labor Relations if you have any questions regarding the contract and for questions regarding Title I-funded activities, please contact your Local District Title I Coordinators or Federal and State Education Program Office (213) 241-6990.)

1. Why can't individual schools carryover Title I funds to the next year especially in light of the COVID-19 pandemic and school closures? Revised 8/2/2020

- a. Each year [although the 2019-20 year was an exception due to a statewide waiver granted by the United States Department of Education (USDE)] the District is limited to 15% that can be carried over in any given year.
- b. School allocations already include anticipated carry-over from the previous year which is factored into the per pupil allocation.
- c. Schools that diligently implement and regularly monitor their expenditures according to their SPSA, will expend their funds within the given year.
- d. The District receives a Title I entitlement annually, and likewise, schools receive an annual allocation. The purpose of these funds is to close achievement gaps for academically at-risk students. By allowing carryover at the school site, it encourages people to not serve these students in the year the funds were allocated, thereby resulting in students falling further behind.

2. What happens to schools' unspent Title I funds for the prior year? Revised 8/2/2020

In keeping with past practice, anticipated unspent Title I funds were added to the 2020-21 school allocations. Any additional unspent funds are swept up at the end of the year and may be redistributed in the new school year to all Title I schools as a second allocation.

3. When are the 2019-2020 Categorical Equipment Inventories due? Revised 8/2/20

FSEP extended the deadline to August 21, 2020, due to the uncertainty of the return date for schools. Schools can submit their 2019-2020 Categorical Equipment Inventories (CEI) to FSEP by this due date. Please note that failure to submit a CEI on or before the deadline will have an impact on shopping carts for non-payroll commitment items.

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4. Will schools be able to purchase equipment throughout the 2020-21 school year with Title I funds? Added 8/2/2020

Because of the COVID-19 pandemic and school closure, the Title I Office made a one-time exception to the January 30th deadline for equipment purchases during the 2019-20 school year. However, schools will need to follow all deadlines and procedures as outlined in the program and budget handbook and the Title I Cheat Sheet for the 2020-2021 school year. The deadline for equipment purchases is January 30th for the 2020-21 school year. In addition, all schools whose SSC has approved to purchase equipment to support the Title I Program at the school site will need to have a current Categorical Equipment Inventory (CEI) submitted to FSEP. Please see question #3 regarding CEI deadline.

5. Is SSC approval needed if schools want to do a Budget Adjustment Request (BAR)?

Yes, a school with Title I funds needs to consult with and seek approval from the SSC to complete a Title I budget adjustment. The school should complete a SPSA Modification along with a BAR (if needed). To conduct a virtual SSC meeting, please see the guidance from PCS or contact your LD PACE Administrator.

6. In this time of social distancing, the Principal can sign the forms but is the expectation to get the SSC Chairperson signature for the SPSA Modification and/or School Budget Signature page? What will serve as evidence of approval? Revised 8/17/2020

A school that is submitting a 2020-2021 SPSA Modification and/or BAR and held a virtual SSC meeting will have two options to meet evidence of approval:

Option 1: If possible and while adhering to LA County Public Health and District guidelines, the school can obtain the SSC signature for both the SPSA Modification and Budget Signature Form.

Option 2: The current SPSA Modification has a field for the Principal to certify in lieu of obtaining the SSC Chairperson's signature. The Principal can certify that the SPSA modification has been prepared and approved in accordance with Education Code 64001(i) and all corresponding documentation is on file at the school site. The certification on the SPSA modification will also be in lieu of obtaining the SSC Chairperson's signature on the Budget Signature Form.

All other required signatures must be obtained and only follow one of the two options when submitting a modification and/or BAR.

Please seek guidance from PCS or contact your LD PACE Administrator for additional guidance or clarity on all documentation that must be on file at the school site.

7. How do I hold a virtual SSC meeting?

Please reach out to your LD PACE Administrator.

8. If the SPSA describes in-person professional development and/or interventions but the school now plans to hold Zoom meetings, does the school need to modify their SPSA?

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No, it does not. It is understood that because of COVID-19 restrictions, having meetings or interventions through virtual learning is equivalent to in-person learning. The only caveat to not needing to change the plan is that the intent and purpose of the strategy in the plan still matches the intent and purpose of the virtual learning. Please see question #10 and #14 Time and Effort Reporting.

9. If a school budgeted PD Teacher Release Days to hold a training during the school day, but now with the implementation of distance learning it does not need to get substitutes for teachers. Can the school pay them Teacher X-Time (non-tutor) instead?

No, you cannot. Unfortunately, these are two different commitment items and therefore, the school will need to submit a budget adjustment and a SPSA Modification to make the change. This means that the school must hold a virtual SSC meeting.

10. What documents does a school need to maintain in order to pay teachers for attending Title I PD after their regular 6-hour paid work day or providing Title I intervention after their regular 6-hour paid work day? (Revised 4-28-20)

Schools will still need to complete the required documents described in BUL-2643.9 along with the COVID-19 Periodic Certification. This certification contains an additional attestation from the Principal stating “I certify that this activity was completed outside of the teachers’ contracted instructional work minutes and office hours.”

Please remember that Title I funds can only be used to pay attendees above and beyond their regular 6-hour paid work day for participating in a Title I activity. For example, schools may pay teachers for planned Title I activities on a school day only if the activities occur outside of the school’s approved regular school day bell schedule that was in place prior to the COVID-19 shutdown (not minimum day, shortened day, or banked Tuesday schedules).

For questions regarding the UTLA Side-Letter, please contact Staff Relations and for questions regarding Title I-funded activities time and effort documentation, please contact your Local District Title I Coordinators, or the Federal and State Education Programs Office (Karen Ryback, Gerardo Cervantes, or Jose Jarquin)

11. What documents does a school need to maintain in order to pay administrators for attending, facilitating and/or supervising a Title I activity (PD or Intervention)?

In keeping with past practices and based on HR’s Guidelines for Extra Duty Pay for Certificated Administrators, administrators must complete a Request for Extra Duty Pay for Certificated Administrators and have it signed by the Local District Superintendent. This completed form along with the required documents described in BUL-2643.9 must be maintained at the school site for audit purposes. During this COVID-19 period and virtual learning, the administrator’s duties may be slightly different as it relates to the supervision of intervention. The determination of reasonableness may be based on the description of services described in the Request for Extra Duty Pay form. All Admin X-time must be described in the SPSA with the specific activity and administrators can only be paid for off-basis days and/or Saturdays. If the activity for the

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Admin X-Time is not described in the SPSA, a virtual SSC must be held so that a SPSA Modification and/or BAR can be submitted to the local district.

12. If schools are conducting a Title I PD remotely, do they still need to maintain sign-in/out sheets to document attendance?

The answer is yes. While the systems for collecting time and effort documentation will have to be different in a remote context, the requirement remains the same. Administrators must follow the guidelines from BUL-2643.9. Below are some options that could help with the sign-ins/outs:

OPTION 1:

- Create a google sign-in form, make sure that all of the required information is included on the sign-in form and provide the link at the beginning of the training.
- In this case you would probably also want to have the participants complete a google sign-out form since it's not easy to change entries once they are entered. If you do that, you could provide the sign out form link (with all the same information required to sign-ins) at the end of the training.

OPTION 2:

- Disseminate electronic version of the sign-in/out sheet for the specific training to each expected participant (making sure to follow what needs to be included in sign-in/out sheets per time and effort requirements)
- After the PD, have each attendee submit to you their sign-in/out form electronically to process payment.

The advantage with Option 1 is that all attendees will be signed in and signed out on one form, so you know who attended the training, and google forms have time stamps, so you know what time people signed in and signed out.

13. What are schools required to keep for time and effort documentation if teachers are providing Title I interventions remotely?

The documents required for remote interventions are sign-in/out sheets for the intervention teacher(s), an intervention flyer describing the intervention, and the COVID-19 Periodic Certification signed by the Principal. See question #12 for the sign-in/out sheet options.

14. What information is required to be included in a sign-in/out form?

The following information is needed for the sign-in sheet for Title I funded PD or Title I funded Intervention:

- Name of School
- School Year

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- Training/Activity Description
- Funding Program and Code (for example, Title I and 7S046)
- Training/Activity Date
- Total Number of Hours of the training/activity
- Employee Name
- Employee Number
- Time In
- Time Out

15. Along with attending PD and Intervention, can Title I funds be repurposed to pay teachers for planning and reviewing data? (revised 4/24/2020)

Yes, these funds can continue to be used for planning and reviewing data along with attending PD and conducting Intervention. Teacher X-Time (non-tutor) can be used to pay teachers for planning or reviewing data through the virtual learning mode as long as it is above and beyond their regular 6-hour paid work day for participating in a Title I activity. If this strategy is described in the plan, the school can move forward with the strategy but if it is not, a SPSA Modification needs to be completed which means that a virtual SSC meeting must be held. Also, Time and Effort documentation, which is described in questions #10-#14, is required to be completed.

16. During this COVID-19 school closures, can Title I equipment be lent to students for distance learning? (Added 6/4/2020)

The answer is yes. Generally, equipment purchased with federal funds may only be used to carry out the purpose of the federal program for which they were purchased and for the intended beneficiaries. In response to questions regarding the use of equipment for distance learning, the United States Department of Education (USDE) provided guidance dated April 29, 2020 titled "Fact Sheet for Repurposing Federal Equipment and Supplies to Combat COVID-19."

The guidance stated the following: "To combat the impact of COVID-19 on the learning environment, the USDE is providing school districts an exception to the allowable cost requirements of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. For example, a school district might distribute unused laptops that it purchased to provide academic enrichment in its paused before- and after-school program to assist students in accessing online instruction in their home. This authority is temporary during the national emergency caused by the COVID-19 pandemic. When the national emergency ends, schools reopen, and students once again begin attending schools in person, the equipment must be returned for use in the Department grant programs for which they were purchased.

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To take advantage of this flexibility, grantees and subgrantees must clearly mark the equipment being repurposed with pertinent identifying information. In addition, grantees and subgrantees must maintain an inventory of the equipment and supplies being repurposed to facilitate proper return, including the following:

- (1) a description and itemization of the type of equipment or supplies being temporarily repurposed.
- (2) the source (Federal program(s) funds involved) from which the temporarily repurposed equipment was purchased and the amount of Federal funds used for the purchase.
- (3) where the equipment or supplies are assigned for use during the duration of the COVID-19 national emergency.
- (4) the date on which the equipment or non-consumed supplies are returned for Federal program purposes.

Additionally, equipment that is lost or damaged must be replaced with non-Federal funds to ensure continued benefit to the Department grant program.”

In response to this guidance, the Title I Office has created a “COVID-19 Federal-Funded Equipment Check Out/In” form for schools to use when distributing federal-funded equipment (7S046, 70S46, 7E046, 7T691, SIG, etc.) and a job aid for completing the form. Here is some general but pertinent information:

- The Check Out/Check In form will be collected by FSEP. The due date is still to be determined (TBD). In the meantime, schools need to track all federal-funded equipment that have been distributed for distance learning during the COVID-19 period.
- Equipment and Supplies are defined as any federal-funded equipment such as laptops, chromebooks, iPads, printers, hot spots, etc. This guidance applies to all federal-funded equipment regardless of cost and not just the ones listed in the Categorical Equipment Inventory (CEI).
- If a school has already developed a check out/check in form, they can continue to use that form as long as all of the required information is included in the school generated form.
- FSEP is aware that the distribution of federal-funded equipment occurred prior to the USDE guidance dated on April 29, 2020. We ask that the school do their best to list the equipment that has already been and continue to be distributed during the COVID-19 period.
- These records must be maintained for five years by the school.

If you have questions, please contact FSEP at 213-241-6990.

Update Professional Development Pay Rates and Criteria
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Fact Sheet for Repurposing Federal Equipment

Fact Sheet for Repurposing Federal Equipment

Job Aid for completing the "COVID-19 Federal-Funded Equipment Check Out/In" Form

Job Aid for completing the "COVID-19 Federal-Funded Equipment Check Out/In" Form

COVID-19 Federal-Funded Equipment Check Out and Check In Form.xls

COVID-19 Federal-Funded Equipment Check Out and Check In Form.xls

For additional information, please contact Gerardo Cervantes at (213) 241-6990 or email to gac0313@lausd.net