



Federal Programs Annual Reminders

November 2023

Please note: New information is underlined

1. Time and Effort Logs
2. Parent Notification
3. School-Parent Compacts
4. Title I Parent & Family Engagement Policies
5. Qualified Paraprofessionals
6. Homeless
7. Schoolwide Eligibility
8. Title I Schoolwide Process
9. Non-Regulatory Guidance for Title I Fiscal Issues
10. Transact
11. Accountability under ESSA
12. Requests for Reimbursement
13. Indirect Cost Rates
14. Ensuring Educational Stability for Children in Foster Care
15. 2021-21 Allocations
16. ESEA Consolidated Application
17. ESEA/ESSA Reviewers & Title I Consultant Assignments
18. Title I Listserv

1. Time and Effort Logs (samples)

Federal funds may only be used for employee compensation if appropriate “time-and-effort” records are maintained. Time-and-effort reporting is important in ensuring that Federal program funds are used to pay only their proportionate share of personnel costs.

2 CFR 200.430(i)(1) states “Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must: (vii) Support the distribution of the employee’s salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.”

NDE recommends that subrecipients continue using the prior time and effort guidance from OMB circular A-87 to ensure adequate support of the distribution of their employee’s salary and wages.

- a. Any personnel paid from Federal Funds (except ESSER) must maintain a Time and Effort Log; sometimes called Personnel Activity Records (PARs). A Time and Effort Log is an after-the-fact report of actual activity of an employee. Logs must be signed by the employee **and** their supervisor or another person in a supervisory position who is familiar with the person’s schedule such as building principal, HR representative, or superintendent. These logs must be kept on file and will be reviewed during ESEA/ESSA monitoring. Local auditors may also request to see the logs.
NOTE: (1) Time and Effort logs are required for every staff member being paid with **any** source of Federal funds. (2) Substitute teachers being paid with Federal funds, must have a signed PAR. (3) Staff being paid stipends with Federal funds must have a signed PAR.
- i. Monthly verifications are required if paid from multiple cost objectives and the schedule fluctuates.
 1. An employee is considered to work on multiple cost objectives if s/he works on:
 - a. More than one Federal award;
 - b. A Federal award and a non-Federal award;
 - c. An indirect cost activity and a direct cost activity;
 - d. Two or more indirect cost activities which are allocated using different allocation bases; or
 - e. An unallowable activity and a direct or indirect cost activity
- ii. Semiannual verifications are required if being paid from only one source or working on a single cost objective.
- b. **Nebraska’s Alternate Time and Effort Reporting System**
 - i. If any employee has a **set schedule, even if working on multiple cost objectives**, s/he may complete semiannual verifications. Verifications (schedule) must be signed by the employee **and** their supervisor or another person in a supervisory position who is familiar with the person’s schedule and kept on file.

- ii. Additional information regarding Time and Effort Logs can be found in the *NDE State and Federal Grants Management Guidance*, which can be found ([here](#)).

NOTE: When entering staff information in NSSRS, make sure they are coded correctly. Staff not giving grades (e.g. reading specialist, Title I teachers, etc.) should be coded as 1180 (Teacher Collaborator). The SPI code should follow their funding source: F=Federally funded in Schoolwide Buildings, 2=Targeted Assistance School. FTE needs to match the percent of time funded. It is important to have accurate information for multiple federal reports.

If you have questions, please contact Beth Wooster at 402-310-1390 or beth.wooster@nebraska.gov or Dottie Heusman at 402-219-4802 or dottie.heusman@nebraska.gov

2. Title I Parent Notification

- a. Districts must ensure that parents are notified if their student is taught for four weeks or more consecutive weeks by a teacher that does not meet the State certification or licensure requirements by grade level or subject area.
- b. Parents of students attending any school in a District that receives Title I funds may request, and the district will provide to the parents in a timely manner, information regarding the professional qualifications of the student's teacher(s). The notification that parents can request this information must be shared annually. This may be done in the schools' handbooks, newsletters, website, etc.

3. Title I School-Parent Compacts

- a. Compacts meeting the ESEA/ESSA requirements are to be provided to Title I students and their parents at least annually. In a Schoolwide Program, this would include ALL students.
 - i. Compacts are to be reviewed annually and updated as needed.
 - ii. It is okay for Schoolwide Programs to include the compact in the Parent Handbook.
 - iii. Signatures by parents and participating students are optional, but strongly encouraged.
- b. The NDE Title I Team has developed a sample School-Parent Compact. It is available on the Title I [webpage](#) under the header "Title I Parent and Family Engagement." This form includes the items required under ESSA and some optional additional items. The document is in Word format, so it is easily customizable for each school.
 - i. The use of this form is not required. It is only required that buildings have a School-Parent Compact that meets ESSA requirements. Please note if this form is used, please remove the water mark, and footer as these are NDE specific for us to post on the website.

4. Title I Parent and Family Engagement Policies

Title I Parent and Family Engagement Policies that meet ESEA/ESSA requirements must be **reviewed annually and updated as needed**. These policies are to be shared with parents of participating students—this means ALL students in a Schoolwide Program.

Parent and Family Engagement Policies are required for the district AND each Title I building OR included in a single policy that covers all school and district requirements. Though it is called a policy, **Board approval is not required**. Each Title I Parent and Family Engagement Policy must include seven required components. **Due to Federal Monitoring, the policies must clearly indicate how the school or district are meeting these requirements**. New sample documents are available on the NDE Title I website ([here](#)) beneath the header "Title I Parent and Family Engagement."

5. Qualified Paraprofessionals

PRIOR TO WORKING WITH STUDENTS, Title I Instructional paraprofessionals must meet ESEA/ESSA requirements. Paraprofessional requirements and other para information can be found ([here](#)), on the Title I website under the header "Paraprofessional Information."

- a. In TAS buildings, this includes any para funded by Title I.
- b. In a SW program, this includes **ALL** instructional paras.

This information is collected in the Nebraska Staff reporting system and the Title I Paraprofessionals Verification Report in the Nebraska Staff and Student Record System (NSSRS) and shows if qualified

or not. The flexibility that Nebraska received for the 2021-22 and 2022-23 school years is no longer allowed according to the US Dept of Ed.

6. Homeless

- a. Every district is required to set-aside ≥\$100 to be used for children and youth experiencing homelessness or used if such students move into the district.
 - i. This is included in the Title I section of the ESSA Consolidated Application.
 - ii. Districts receiving a McKinney-Vento grant must match amount of allocation with Title I funds.
- b. New District liaisons are required to take a training using an online program provided by NDE.
 - i. This training can be found at the following link: <https://canvas.education.ne.gov/>
- c. The District Liaison is the Superintendent unless the district indicates otherwise by including the information on the Unified Grant Profile (UGP) Contact Information page.
 - i. For districts that assign all their funds to an ESU, the superintendent will be considered the homeless liaison UNLESS you contact Ann Carmoney at ann.carmoney@nebraska.gov with the name of liaison.

7. Title I Schoolwide Eligibility

- a. Schools having a poverty level ≥ 40% are eligible to become Title I Schoolwide Programs. (Becoming a schoolwide program is an option; not a requirement.)
- b. Schools that are eligible for, but don't already have a Schoolwide Program, may submit a "Title I Schoolwide Intent Form," by December 1st and use the 2023-24 school year to develop a schoolwide plan. If you have questions regarding Schoolwide Programs, contact Dottie Heusman (dottie.heusman@nebraska.gov or 402-219-4802).
- c. Information regarding Title I Schoolwide Programs is available on the NDE Title I webpage: ([here](#)) below the "Schoolwide Program and Resources" header.

8. Title I Schoolwide Process

The 3-year Peer Review Process is being eliminated starting in the 2023-24 school year. Schools creating new Schoolwide Plans will submit plans for NDE to review via Share Point, but those that already have approved plans will do a self-review each year and only send any changes made to the plan to NDE. It is still a requirement for Plans to be posted on the school's website. Beginning in the 2024-2025 Title I Grant in GMS the district will be required to submit the URL for each building's plan. Peer Reviews that used to occur in April will no longer occur. During the 5-year monitoring NDE staff will be reviewing the Self-Reviews and discuss plans at that time. The Title I Schoolwide documents – Schoolwide Plan Template, and Schoolwide Self-Review form can be found ([here](#)).

9. Non-Regulatory Guidance for Fiscal Issues

(November 2016) Fiscal Changes & Equitable Services Requirements ([here](#))

This document contains information on the following topics:

- a. Maintenance of Effort
- b. Comparability
- c. Supplement, Not Supplant
- d. Carryover
- e. Consolidating Funds in Schoolwide Programs
- f. Grant back Requirements

NOTE: Much of the information described in number 9, is also included in [the NDE State and Federal Grants Management Guidance](#)

10. Transact

The Nebraska Department of Education has paid the license fee for all Nebraska School Districts for the 2022-23 school year. To access the [Transact website](#) go to the following link: <http://www.transact.com/> The website contains numerous forms that are available in multiple languages.

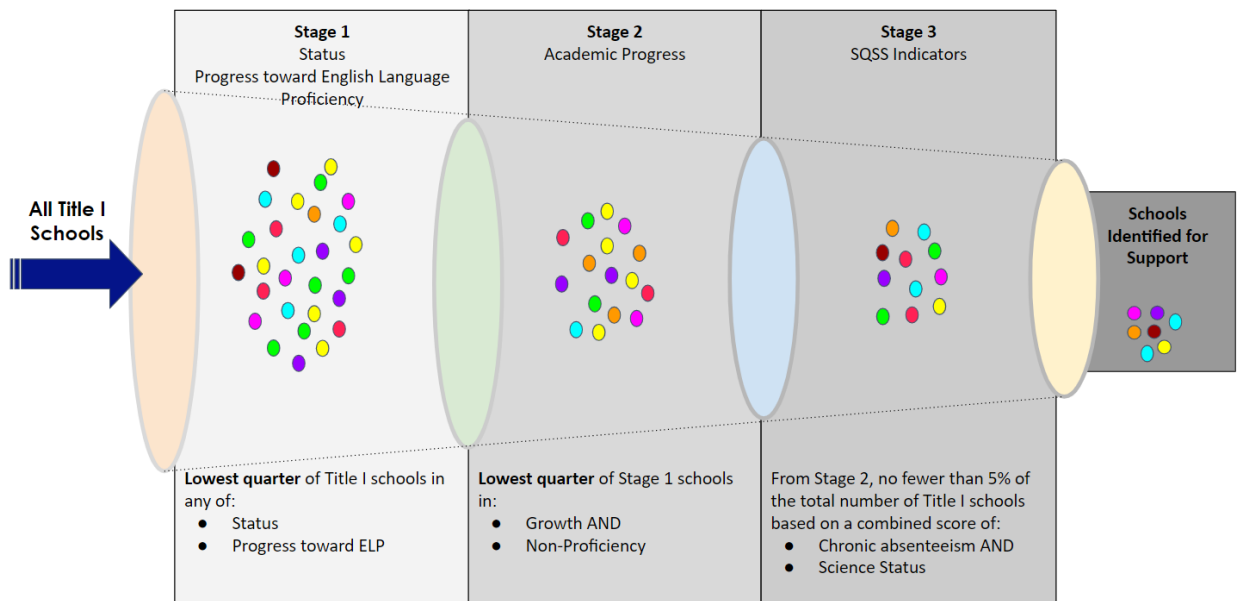
- a. The Nebraska Department of Education subscribes to:
 - i. GenEd collection (20+ languages)—wide ranging forms covering communications to parents on such things as health, medical, school, office, and classroom topics

- ii. State Masters—including Home Language Survey questions required by Rule 15 in five languages
- iii. English Learner Collection (appx 10 languages)—includes program placement form required under Title I, previously required under Title III
- iv. ESSA Parent Notifications (English and Spanish),
- v. 504 Collection (English only). It may be accessed by any person employed by a Nebraska district using your email address. You will just need to set up your password. Districts are encouraged to explore the site. There are some updates from previous years.

11. Accountability under ESSA

Nebraska submitted an ESSA Plan Amendment to account for necessary adjustments to the federal designation process. We have received and responded to initial feedback from the U.S. Department of Education. Since we are awaiting formal approval, we have not released any ESSA Designation Business Rules. However, you can find the [2022 ESSA Designation Business Rules here](#).

- a. The ESSA Plan Amendment captures some updates to the revised identification and exit criteria informed by data reviews and extensive stakeholder engagement. For example, the TSI and ATSI designations now offer more opportunities for a school to exit the process of identification by ensuring both indicators for Stage 2: Academic Progress have not been met before moving on to the next stage. (See example of one of the adjusted filters below.)
- b. ATSI schools identified in 2019 will be eligible to exit this designation this fall. As a reminder, the exit criteria is to not be reidentified for ATSI for the same student group and make any improvement Stage 1 indicators. If an ATSI school does not exit, the school will become a CSI School. You can check your 2022 designations on your school's report card on the NEP, as well as on the District and School AQuESTT Report on NEP Secure.
- c. AQuESTT Classification **EMBARGOED** data is available on NEP Secure. This data is not official and should not be shared. If access is needed, reach out to your district administrator.
- d. Tentative timeline for public release of accountability results is end of November/early December.
- e. If you have any questions, reach out to Shirley Vargas, Administrator, Office of School and District Support, shirley.vargas@nebraska.gov and Derek Ippensen, Assistant Administrator, Office of School and District Support, derek.ippensen@nebraska.gov



CSI: Title I Elementary and Middle Schools

12. Requests for Reimbursement

- a. Districts are encouraged to submit requests for reimbursement throughout the school year. The timeline may not be the same for every district. Some may choose to submit quarterly, while others may opt to submit monthly requests. It is advisable to submit requests for reimbursement more than once a year. Districts/ESUs have the option of submitting separate requests for salaries/benefits, and other expenditures. Providing appropriate documentation will speed up the review process.
- b. Due to changes with the reimbursement process, Districts will not need to submit the following items unless requested. However, it is imperative that Districts keep these documents for Fiscal Monitoring requirements.
 - i. Credit card purchases
 - ii. Travel expenditures
 - iii. Petty cash purchases
 - iv. Reimbursement to individuals
 - v. Allowable field trips must include the educational value
 - vi. Generally, there is a very high burden of proof that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a federal grant. There may be unique circumstances where the costs would be permissible because they are reasonable and necessary. To be considered for reimbursement, the district must provide a detailed explanation as to why the purchase is necessary with Federal funds
- c. Information regarding allowable Federal Title Program Expenses is available in the *NDE State and Federal Grant Management Guidance*.
- d. Information is also available on the Title I Title [webpage](#) under the header "Allowable Federal Title Program Expenses."

13. Indirect Cost Rates

- a. **Important:** If the district uses Indirect Costs for one grant during the year, the district must use indirect costs for all federal and state grants for all programs proportionally during the school year.
- b. There is a tab in the UGP for districts to indicate if they plan to use Indirect Costs for the 2023-24 school year. If a district wishes to use a lower percentage than indicated in the UGP, contact Bryce Wilson to have the Indirect Cost Rate lowered.
- a. The Indirect cost rates for 2023-24 can be found ([here](#)). NDE in turn applies this approved methodology to calculate indirect cost rates based on district Annual Financial Reports (AFRs) that are on file at NDE.
- b. Explanations:
 - i. "Restricted Indirect Cost Rates" are used with grant programs that restrict expenditures to those that **supplement but do not supplant** state or local effort. ESEA and IDEA Federal Programs use the restricted rates.
 - ii. "Non-Restricted (or Unrestricted) Indirect Cost Rates" apply to federal programs that allow federal funds to **supplement and/or supplant** local funds. The Child Nutrition Program (school lunch) uses the non-Restricted rate.

14. Ensuring Educational Stability for Children in Foster Care

- a. USDE Non-Regulatory Guidance and Dear Colleague Letters available at www2.ed.gov/about/inits/ed/foster-care/index.html
- b. Key points
 - i. Intended to minimize disruptions for children in foster care
 - ii. A child in foster care will remain in the child's school of origin, unless a determination is made that it is not in the child's best interest to remain in that school.
 - iii. If it is in the best interest for the child to enroll in a different school, the child will be immediately enrolled, even if the child is unable to produce records normally required for enrollment.
 - iv. Districts that receive Title I funds must develop and implement clear written procedures, in collaboration with the State or local child welfare agency, governing how transportation to maintain children in foster care in their school of origin, when in their best interest, will be provided, arranged, and funded for the duration of a child's time in foster care.
 - v. District must designate a point of contact (POC) regarding children in foster care.

- vi. SEC 1112(c)(5)(B) states that LEAs must begin implementing the requirements regarding transportation for students in foster care by **December 10, 2016** (one year after the enactment of ESSA).

15. 2023-24 Allocations

The allocations for the 2023-24 school year can be found ([here](#))

16. 2023-24 ESSA Consolidated Application

Application opened Wednesday, July 18th and was **due to NDE on or before September 28th**. Grants included in the application are Titles I-A, I-D, II-A, III (EL & IE), and Title IV-A.

17. ESEA/ESSA Reviewers Assignments

The chart below provides a list of ESEA/ESSA Reviewers by ESU area for the 2023-24 school year. The ESEA/ESSA Reviewer is the person responsible for reviewing the ESEA/ESSA Consolidated Application and onsite monitoring. Because we have a small team and we are spread thin, it is best to reach out to the reviewer assigned to your district first – they will be able to answer most of your questions, &/or find the answer. If you are unable to reach the consultant assigned to your district, then reach out to any one of the rest of us and we will be happy to help.

--2023-24 ESEA/ESSA ASSIGNMENTS --			
ESU	ESSA REVIEWER	PHONE #	EMAIL ADDRESS
1	Amanda Noonan	402-405-4616	amanda.noonan@nebraska.gov
2	Amanda Noonan	402-405-4616	amanda.noonan@nebraska.gov
3	Dottie Heusman	402-219-4802	dottie.heusman@nebraska.gov
4	Anne Hubbell	402-405-7017	anne.hubbell@nebraska.gov
5	Jim Kent	402-405-6456	jim.kent@nebraska.gov
6	Anne Hubbell	402-405-7017	anne.hubbell@nebraska.gov
7	Jim Kent	402-405-6456	jim.kent@nebraska.gov
8	Jim Kent	402-405-6456	jim.kent@nebraska.gov
9	Jim Kent	402-405-6456	jim.kent@nebraska.gov
10	Ann Carmoney	402-525-7109	ann.carmoney@nebraska.gov
11	Ann Carmoney	402-525-7109	ann.carmoney@nebraska.gov
13	Julie Otero	402-405-5212	julie.otero@nebraska.gov
15	Julie Otero	402-405-5212	julie.otero@nebraska.gov
16	Amanda Noonan	402-405-4616	amanda.noonan@nebraska.gov
17	Ann Carmoney	402-525-7109	ann.carmoney@nebraska.gov
18	Jim Kent	402-405-6456	jim.kent@nebraska.gov
19	Dottie Heusman	402-219-4802	dottie.heusman@nebraska.gov
Final Reviewer	Beth Wooster	402-310-1390	beth.wooster@nebraska.gov

18. NDE Title I Listserv

We are no longer using the Title I Listserv. Now that we have the Unified Grant Profile (UGP), we will no longer maintain a separate Listserv. If there are individuals in the district that need to receive information on any of the Federal Programs, their name and contact information should be listed in the UGP otherwise we will count on the Authorized Representative to forward the information.

Important Federal Programs Links:

Federal Programs Timeline for Superintendents – Year at a Glance ([here](#))

The ESSER I, II & III 3-year Desk Monitoring Schedule ([here](#))

The ARP HCY I & II 3-year Desk Monitoring Schedule ([here](#))

The ESEA/ESSA 5-year Monitoring Schedule ([here](#))

An updated list of Title I Schoolwide Programs is available ([here](#))

Keep up the great work of influencing the lives of students and please never hesitate to contact the Federal Programs Team if you have questions.



Beth Wooster

Administrator

Office of ESEA Federal Programs

500 S. 84th St., 2nd Floor

Lincoln, NE 68510-2611

P: (402) 310-1390

E: beth.wooster@nebraska.gov