

Speed Bumps on the Fiduciary Road



Title I Administrative Meeting
Timonium Maryland
April 14, 2010
Cvieta Jovanovich

Purpose of Speed Bumps

Caution

Focus

Keep Honest

Safety

Watch

Monitor



Warning

“Spend funds quickly. . . .”

- ❑ Save and create jobs
- ❑ Improve student achievement through school improvement and reform



Invest ARRA funds thoughtfully . . .



But ensure:

- ▣ Transparency
- ▣ Reporting
- ▣ Accountability

Including Title I Part A

Where are Title I “speed bumps” located?

- Title I Law – ESEA
- Regulations – 34CFR Part 200
- Education Department General Administrative Regulations (EDGAR)
- OMB Circular A-87 – Cost Principles
- OMB Circular A-133 – Audit Requirements
- A-133 Compliance Supplement
- Non regulatory guidance
- Letters and press releases issued by ED

Requirements

- ❑ Maintenance of Effort
- ❑ Comparability
- ❑ Supplement Not Supplant



Federal Cost Principles

- ❑ Necessary
- ❑ Reasonable
- ❑ Allocable
- ❑ Legal



???

Bumps Missed or Forgotten??

Spend down of funds!

- ❑ Parent Involvement
- ❑ Services to Private School Students
- ❑ Required Reservations (homeless, professional development, N/D)
- ❑ School Level Allocations
- ❑ ARRA Funds (late allocating to schools)



More Missed!

- ❑ Supplement/ Supplant – Time and Effort
- ❑ Carryover – First in First Out
- ❑ Audits – Same Findings
- ❑ Equipment/Inventory – Missing Written Process or Not Implemented

How to Safely Travel the Fiduciary Road

- Training
- Increase Knowledge of the Requirements within the LEA (central office and schools)
- Monitor
- Ask for Technical Assistance



Questions

