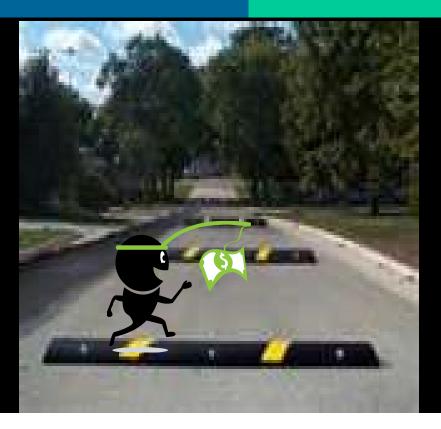
# Speed Bumps on the Fiduciary Road



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

## Purpose of Speed Bumps

Caution



Monitor

SPEED BUMP

Focus

Keep Honest

Watch

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





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### 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

