

The background of the slide is a composite image. The top left shows a line of yellow school buses, with the number '32' visible on the front of one. The bottom left shows a classroom with blue walls, decorated with colorful balloons and framed pictures. There are several small white tables and chairs arranged in the room.

Rural and Low-Income Schools (RLIS) FY26 Cadre

October 2025



Kentucky Department of
E D U C A T I O N

Welcome!
Thanks for your participation!

****Please mute your microphones and turn your cameras off****

Questions during the presentation?

Please feel free to use the chat feature on Teams.

Tentative Plan

- Webinars: About once every two to three months/TBD
- Approximately one hour
- Open to all districts receiving the RLIS (Rural Low-Income Schools) and SRSA (Small Rural Schools Achievement) grant.
- Topics will be determined based upon your feedback.
 - Short survey will be provided to record participant feedback at the conclusion of each webinar.

Introduction/Overview of Today

- Survey results from the FY26 RLIS Cadre Interest Survey
- FY2026 application updates
- Important coordinator tasks for the beginning of each school year
- Coordinator share out
- Final questions answered from the Teams Chat
- Helpful resources

Each webinar will be posted on the Kentucky Department of Education's Kentucky Department of Education (KDE) [Title V, Part B - Rural Education Achievement Program \(REAP\) webpage](#) shortly after its conclusion.

FY26 Cadre Interest Survey Trends

- Title V coordinator new to the role (second year or less as coordinator): 47%
- Many of you coordinate Title I, II and/or Title IV also.
- Coordinate Title III: 46%
- Coordinate other programs (Title IX/Family Resource Youth Service Center/Homeless/Foster): 3%
- Plan to support Title I with the funds: 67%
- The majority of you are interested in:
 - Allowable expenditures for Title V funds
 - Creating and maintaining proper documentation for the Title V program
 - Best practices for implementing a Title V program

FY2026 Title V Application Status

- Applications were due Aug. 31, 2025.
- Of the 86 RLIS-eligible districts:
 - 75 have submitted applications that have received initial approval.
 - 11 applications are currently being edited by districts to gain initial approval.

Title V Application Reminders

- Use current data that reflects the needs identified for SY2025-26.
- Ensure alignment across all pages of the application.
- Purchase of non-consumable items must support identified needs.
- Confirm that expenditures for English learner (EL) students are supplemental.
- Update concerning virtual students
- School Resource Officers (SROs)
- New teacher mentorship

Important Tasks for the Beginning of each School Year

- Set up a system to collect Title V documentation.
 - Time and effort
 - Allowability procedures
 - Safeguarding of assets
- Schedule quarterly meetings with the finance officer to analyze alignment of the Enterprise ERP (EERP) and Grant Management Application and Planning (GMAP) system budgets.
- Person Role Manager/Open House
- Bookmark the Kentucky Department of Education ([KDE](#)) [Title V, Part B webpage](#) and the KDE pages for programs eligible to be supported with Title V funds ([Title I, Part A](#), [Title II, Part A](#), [Title III](#) and [Title IV, Part A](#)).

Documentation Retention Requirements

- Records must be maintained for a period of three years from the date of submission of the final expenditure report per [2 CFR 200.334](#). Records can be maintained electronically per [2 CFR 200.336](#). Please note that any documentation related to ongoing litigation must be retained until resolved.
- When a district is monitored by KDE or other auditors, documentation must be provided showing that the Title V program is being run effectively and complies with requirements. A list of suggested and required documentation can be found on the [RLIS Monitoring Checklist](#). Contact your [KDE Title V Consultant](#) to verify other appropriate forms of documentation.

Time and Effort Documentation

- According to [2 CFR 200.430](#), records must be maintained for all employees paid fully or partially from Title V funds. This applies to staff at the district and school levels. These records are often referred to as time and effort records and must reflect an *after-the-fact* distribution of the actual activity of the employee.
- In addition to time and effort records, the district must also develop and implement written time and effort procedures outlining how the requirements for accurate documentation of time and effort will be met. These written procedures should be specific to the district and include instructions for meeting the requirements of [2 CFR 200.430\(i\)](#).
- Two common types: Personnel Activity Reports (PARs) and semi-annual certifications

PARs

- Should be maintained for personnel working with more than one cost objective.
 - Example: A teacher works part-time as a EL interventionist for EL students as part of the district's core EL program and is paid with general funds and works part time in a 3rd-grade classroom as supplementary classroom reduction, paid out of Title V. Because the EL intervention is part of the district's core EL program, it cannot be supported with federal funds such as Title V. The work providing supplementary classroom reduction is an allowable use of Title V, making this an example of multiple cost objectives.
- Provide an after-the-fact distribution of the actual portion of time and effort dedicated to Title V and all other sources.
- Should be reviewed monthly to verify the amount of time actually spent on each cost objective and not manipulated to reflect a desired percentage.

Example PAR (abbreviated)

Personnel Activity Report

Employee Name: _____

Date Range: From _____ through _____

Office/School: _____

Reporting Period Date	Cost Objective: _____ Hours	Cost Objective: _____ Hours	Total Hours

This certifies that above is an accurate representation of the work performed during the time period indicated.

Employee Signature: _____

Supervisor Signature: _____

Please note: This is an abbreviated example and should have enough information for the entire school year.

Semi-annual Certification

- If the district's time and effort procedures call for completion of semi-annual certifications, personnel working with a single cost objective should complete a semi-annual certification, usually twice a year. A single cost objective can be a single function, a single grant or a single activity. It is possible to work on a single cost objective even if an employee works on more than one federal award or on a federal award and a non-federal award.
 - Example: A supplemental math teacher works in a school serving low-achieving students with 50% Title V, Part B funds and 50% general funds. Teaching math to low-achieving students is a single cost objective because it can be fully supported under Title V, Part B.

Example Semi-annual Certification

Semi-Annual Certification

Fiscal Year: _____

Name of School District: _____

In accordance with federal guidelines, when employees work solely on a single federal award or cost objective, charges for the employee's salary and wages must be supported by a certification signed by an employee or supervisory official having firsthand knowledge of the work performed by the employee. The certification will be prepared at least semi-annually and will be signed by the employee or supervisory official having firsthand knowledge of the work performed by the employee.

I, [Employee Full Name], certify that 100% of my work time from [Beginning Date Month/Year] to [Ending Date Month/Year] was spent on [Federal Funding Source] duties and responsibilities or the single cost objective of [Enter Single Cost Objective].

Employee Signature: _____ Date: _____

Supervisor Signature: _____ Date: _____

Allowability Procedures

[2 CFR 200.302\(b\)\(7\)](#) requires non-federal entities (such as districts) to maintain written allowability procedures as part of their financial management systems.

- More than a policy stating the district will ensure purchases are allowable.
- Written procedures should outline the specific steps taken by the district to ensure all purchases made with federal funds are allowable.
- The written procedures should at a minimum mention how it can be determined by anyone in the district whether a purchase is reasonable, allocable and necessary, as well as how documentation is to occur (RAND).

RAND (Reasonable, Allocable, Necessary, Documented)

- Reasonable: Not excessive in cost and based on prudent and sound purchasing practices. [2 C.F.R. § 200.404](#)
 - Does the cost seem reasonable in comparison to fair market prices for comparable goods or services?
 - Does the expenditure help to target the purpose of the grant?
 - Did the district follow its purchasing or procurement procedures?
 - [2 CFR 200.318 through 200.327](#)
 - What example(s) could be provided to any auditor to document the cost as reasonable?

RAND: Allocable

- Allocable: Cost is incurred specifically for the benefit of the program, distributed proportionately, an allowable activity, and meets the program's intent. [2 C.F.R § 200.405](#)
 - Is the cost incurred specifically for the title program?
 - Does the cost meet the intent of the title program?
 - If costs are shared with another program, is that program's portion incurred proportionately?
 - Is the purchase supported by the funding matrix (located on KDE's [Federal Grants webpage](#)) and/or allowable EERP codes in GMAP?

RAND: Necessary

- Necessary: Essential for carrying out the needs-based, Title V, Part B, Subpart 2 program. [2 C.F.R. 200.403\(a\)](#)
 - Could the cost be deemed necessary for the operation of a quality, efficient title program as outlined in the district's application?
 - Is the need for the cost supported in the needs assessment, CDIP/CSIP or a statement in the GMAP application?

RAND: Documented

- Documented: Purchases must be adequately documented. [2 C.F.R § 200.403\(g\)](#) and [2 C.F.R. § 200.302\(b\)\(3\)](#)
 - Could the district readily document the reasonableness, allocability and necessity of the cost?
 - Is documentation maintained for the number of years required per the [Records Retention Schedule](#)?
 - Best practice: maintain program records for five years
 - Does the district have records related to the purchase?
 - Rationale as to why a specific vendor was chosen, price quotes, purchase orders, etc.

Safeguarding of Title V Assets

- An inventory of items meeting the definition of equipment is required under [2 CFR 200.313\(d\)](#). The district should develop a procedure for entering information into the inventory management system to provide adequate controls for the location of equipment, custody of equipment and security of equipment.
 - May use a spreadsheet or inventory software available
 - Physical inventory is only required every two years
 - Hardcopy of inventory should remain current in the event of an audit by either the KDE or USED.
- [KDE Capital Asset Guide in EERP](#)

Equipment Inventory Records Requirements

- A **description** of the equipment (the type and model)
- A **serial number**, identification number or model number
- Funding source, Federal Award Identification Number (FAIN) and percentage (who holds title) under which the equipment was acquired.
 - For the purpose of this document, the funding source is **Title V, Part B**. The **grant award year** also should be included.
- Vendor
- Acquisition date (delivery date)
- Unit **cost** (*not* total cost)
- **Location** (school and location within the school [library, classroom 200, etc.])
- **Use** of the equipment (Title I classroom, Title I afterschool program, Title I administration)
- The **condition** of the equipment (new, good, fair, poor)
- The **date** the information was reported on the inventory
- Information regarding the transfer, replacement or disposition of equipment (date of disposal, sale price of equipment)

Lost, Stolen or Damaged Equipment Documentation

- Important Components:
 - Responsibility and accountability: Identify who is responsible for federal property and what is expected of all users.
 - Immediate reporting: Outline clear steps for employees to follow when an incident occurs. Must include who incidents should be reported to, when to notify law enforcement, how to document the incident, etc.
 - Investigation: Detail the process for investigating an incident.
 - Disposition: District procedures should be based upon the district's policy.
 - As the pass-through entity, KDE must also be notified of any loss, damage or theft that will impact the federal program.
 - Update records: Inventory records should be updated for the item and documentation maintained based upon record retention policies.

Quarterly Meetings to Maintain Alignment

- [34 CFR 76.700](#) requires districts comply with the state plan, regulations, statutes and approved applications. This includes spending Title V Part B funds in accordance with the KDE-approved application.
 - Revising the application when the district intends to make significant changes allows KDE to review the proposed expenditures and amounts to ensure they meet all allowability requirements and that other program requirements are being maintained.
 - Districts must also regularly compare the actual expenditures made in EERP with the GMAP application budget and address areas of misalignment.
 - KDE recommends the Title V coordinator and district finance officer review GMAP and EERP at least quarterly to ensure alignment between the platforms and timely expenditure of funds.

Person Role Manager/Open House

- KDE's Open House is a list of your district's contacts for each role performed.
 - KDE emails information regarding the Title V program to all district Title V coordinators throughout the year.
 - Important announcements, deadlines for funding and programmatic needs, new and updated resources, newsletters and professional learning and training opportunities
 - The list of recipients for these emails is generated by a program called Person Role Manager. The district web apps admin point of contact (WAAPOC) can update the personnel listed in this program.
 - The district contacts listed in Person Role Manager feed into the Open House website.

Person Role Manager Instructions

- To change or verify the Title V coordinator for your district, follow these instructions:
 - Verify the Title V coordinator by selecting your district on [Open House](#).
 - If the role is blank or incorrect, the update must be made in Person Role Manager via [KDE Web Applications](#).
 - For Title V coordinators who are listed but no longer should be, their Role Status must be changed to “inactive,” and a Role End Date entered via KDE Web Applications | Person Role Manager.
 - To add a Title V coordinator, the Role Status must be set to “active” and a Role Start Date entered. Also ensure an email address is entered on the demographic screen. This should be done via KDE Web Applications | Person Role Manager as well.
 - To ensure important communications are received, update the contact information and list the correct point of contact as “active” in Person Role Manager for Title V coordinator.

Coordinator's Corner

- Goal: Let you hear from other coordinators across the state about how they are using Title V funds in their district effectively.
- Today's guest: Lincoln County Title V
- Please reach out to let us know the great things your district is doing in a future webinar.
 - shashawna.dotson@education.ky.gov

Q&A Time

Teams chat questions...

Helpful Resource Spotlight

- ESEANow
 - Subscription provided to all districts by KDE again for FY26.
 - Emails twice a week with helpful information about all title programs.
 - Contact your district's Title I coordinator to begin receiving these emails.
- Helpful information on title programs supported with Title V funds
 - [Can Title II pay for performance-based bonuses for teachers?](#)
 - [Head back to school with ESEA Now's top sample forms, tools of summer](#)
 - [Smart Start: English Learners: State and District Obligations](#)
 - [Programs manager eases back-to-school burden by pacing staff onboarding](#)

Helpful Resources for Title V from KDE

- [KDE's Title V, Part B - Rural Education Achievement Program \(REAP\) webpage](#)
- KDE pages for programs eligible to be supported with Title V funds:
 - [Title I, Part A, Title II, Part A, Title III, and Title IV, Part A](#)
- [RLIS Monitoring Checklist](#) Updated for the FY26 monitoring season
- [Federal Grants webpage](#) KDE's funding matrix/Be sure to use the noncompetitive federal funding matrix
- [KDE Capital Asset Guide in EERP](#)
- [Open House](#): Check to ensure that your roles are accurate.

Watch for an email with a link to the newly created KDE Title V RLIS Handbook for coordinators!