



MAINE DEPARTMENT  
OF EDUCATION

# Federal Fiscal Office Hours January 2026

Please rename yourself using your first & last name, and SAU.  
Please turn your camera on, if able.



# Agenda

- **General Updates & Reminders**
  - Funding Balances & Thoughts to Ponder
- **Contract Development**
- **Reimbursements**
- **Team specific Updates**
- **Q & A**

# Interagency Agreements

- On November 18, 2025, the [US Department of Education announced six interagency agreements \(IAA\)](#)
  - Office of Elementary and Secondary Education – Department of Labor
  - Post secondary Education – Department of Labor
  - Indian Education – Department of the Interior
  - Foreign Medical Accreditation – Department of Health and Human Services
  - Child Care Access Means Parents in School – Department of Health and Human Services
  - International Education and Foreign Language – Department of State
- US ED is still working through the details of each IAA, determining next steps. No further information has been provided.
- The Maine DOE will continue to monitor this situation and provide updates. Our offices remain ready to support and assist you.



# General Reminders



## Funding Balances



Grant / Year	Period of Performance	Remaining funds
<b>ESEA</b> FY23 FY24 FY25 FY26	7/1/22 - 9/30/25 7/1/23 - 9/30/26 7/1/24 - 9/30/26 7/1/25 - 9/30/27	<b>\$109,705.04 (&lt;1%)* forfeited</b> \$969,832.03 (2%) \$10,936,034.71 (16%) \$66,361,427.03 (93%)
<b>SIG</b> FY24 FY25	7/1/23 - 9/30/25 7/1/24 - 9/30/26	<b>\$361,502.21 (32%)* forfeited</b> \$773,901.99 (43%)
<i>*as of December 22, 2025</i>		
<b>IDEA</b> FY24 \$57.8m FY25 \$57.2m FY26 \$58.3m	7/1/23 - 9/30/25 7/1/24 - 9/30/26 7/1/25 - 9/30/27	<b>\$429,701.10 forfeited</b> \$13.2m 22.8% remaining \$55.9m 95.8% remaining
<b>Adult Education</b> FY25 FY26	7/1/24 - 6/30/25 7/1/25 - 9/30/26	\$144,325.98 \$1,369,989.99

We draw your attention to funds that are yet to be reimbursed for each of the listed grants. We are aware that for many SAUs, these funds have been obligated and expended however, reimbursement has not yet been sought from the Department. We therefore encourage you to submit invoice reimbursements as soon as possible.

# Forfeited Funding

Program	# of SAUs	Total Amount	
IDEA	19	\$429,701. <sup>10</sup>	These funds can be repurposed to a SAU not meeting FAPE.
ESEA	43	\$109,705. <sup>04</sup>	These funds have expired can not be used by an SAU or the Maine DOE.
SIG	27	\$361,502. <sup>21</sup>	These funds are currently reallocated for summer programming.
Perkins	27	\$105,651	These FY25 Perkins funds have expired and cannot be used by an SAU or Maine DOE.
McKinney-Vento	8	0	All FY 23 funds were fully expended.



## The Million Dollar Questions



Has your SAU:

- 1. Submitted at least two FY26 invoices?**
  - 45% of the state's SAUs have not submitted any FY26 invoices
- 2. Requested 22% of your FY26 award?**
  - As a State, only 7% of FY26 have been requested as reimbursements.
- 3. Pacing appropriately for all requirements?**
  - I.e. Title I carryover limitations

With the funds that have been forfeited (expired) that we highlighted on the previous slide, we wanted to pose a few questions for you to ask yourself about the SAUs that you work in. These are questions that will check whether the SAUs spending is on track to meet federal requirements.

First, we want to look at invoice submission. Timely drawn down is the efficient and effective process of accessing and using federal grant funds within the allotted timeframe and according to grant guidelines. At this point in the fiscal year - 7 months into our 27-month period of performance - SAUs should have submitted at least two FY26 invoice. Again, if your award is over \$250,000, your SAU should have submitted at least 6 invoices! Statewide, there is 45% of SAUs (79) that have not yet submitted any FY26 invoices. This may indicate delayed spending, delayed reimbursement requests, or a need for additional support with the reimbursement process.

Next, we're examining reimbursement pacing. Ideally, SAUs should have requested approximately 22% of their FY26 allocation by this point in the year. As a state, however, only 7% of FY26 funds have been requested for reimbursement, which suggests overall spending is significantly behind schedule.

Slow spending can create compliance risks later in the year. One key ESEA concern is Title I

carryover limitations, which restrict how much funding can be carried forward without justification or approval. If funds are not spent and reimbursed evenly throughout the year, SAUs may face challenges meeting these requirements. The Title I Carryover limitation is just one example of the requirements that may be impacted with slow spending and reimbursement requests.

Now is a great time for SAUs to review their current spending and reimbursement activity. It is important to submit invoices regularly, monitor reimbursement percentages, and aligning spending with program requirements to avoid forfeiting funding.

# **Key Considerations for Developing and Implementing Contracts Funded by Grants**

## Overview

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- Ensure compliance with grant terms and period of performance
- Follow all applicable federal regulations
- Maintain transparency in procurement
- Manage budgets carefully
- Establish strong documentation and reporting practices



## Review the Grant Agreement Thoroughly

- Contracts **cannot be signed** before:
  - Start of period of performance (July 1, 20xx)
  - Substantial approval of the grant application
- Understand deliverables and reporting requirements
- Review budget limitations and special conditions
- Be mindful of minimums and maximums in the contract.



### Understand Applicable Regulations

- Grants fall under **Uniform Guidance (2 CFR 200)** which covers:
  - Financial management
  - Procurement standards
  - Audit requirements
- Internal policies must align with federal requirements



These actions are necessary to maintain compliance with federal grant contracts and associated regulatory requirements. Federal regulations governing **contracts paid with federal grant funds** are primarily found in the **Uniform Guidance (2 CFR Part 200)**, along with program-specific statutes

## Reminder when an obligation is made

- Varying circumstances depending upon the purpose.

### Reminder:

- All funds must be timely and meaningfully obligated prior to **9/30 with the vendor**
  - Statute does permit the services to be performed during the liquidation period however....
    - Payments for services must be completed within the liquidation period
    - We strongly recommend and it is best practice to obtain the services within the period of performance [2 CFR § 76.707](#)

If the obligation is for—	The obligation is made—
(a) Acquisition of real or personal property	On the date on which the State or subgrantee makes a binding written commitment to acquire the property.
(b) Personal services by an employee of the State or subgrantee	When the services are performed.
(c) Personal services by a contractor who is not an employee of the State or subgrantee	On the date on which the State or subgrantee makes a binding written commitment to obtain the services.
(d) Performance of work other than personal services	On the date on which the State or subgrantee makes a binding written commitment to obtain the work.
(e) Public utility services	When the State or subgrantee receives the services.
(f) Travel	When the travel is taken.
(g) Rental of real or personal property	When the State or subgrantee uses the property.
(h) A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR part 200, Subpart E—Cost Principles	On the first day of the grant or subgrant performance period.



Funds that are expiring on 9/30 can be obligated until 9/30, however be mindful of the requirement when utilizing funds for purchased services. You can continue to use the funds for services within the liquidation period provided they were timely and meaningfully obligated by 9/30. Obligating a contract on 9/29 for services to be rendered mid-October would not meet the definition of a timely obligation. If you are in doubt, please reach out to the applicable federal program manager or fiscal lead. Travel and coursework must be completed before 9/30.

## Implement Strong Internal Controls- Policies & Procedures

- Establish written policies and procedures
- Ensure proper oversight of grant funds
- Support effective grant management and compliance

### Establish Clear Procurement Procedures

- Promote full and open competition
- Maintain a written procurement policy
- Document:
  - Solicitation process
  - Vendor selection rationale
  - Cost/price analysis

### Identify and Address Conflicts of Interest

- Implement a written code of conduct
- Require disclosure of real or apparent conflicts
- Establish procedures to manage conflicts appropriately



### Verify Contractor Integrity

Required for contracts over **\$25,000**

Review:

- Performance history
- Compliance with laws and regulations
- Check references

Confirm contractor is not debarred or suspended

Check **SAM.gov**



## Cost Principles (2 CFR Subpart E)

Contract costs must be:

**Necessary and reasonable**

**Allocable to the grant**

**Consistent with policies and procedures**

**Allowable under the specific federal program**

## Track Cost Meticulously

Costs must be: Reasonable, allocable and allowable to the grant, consistent with organizational policies.

Use separate accounts or funding codes  
Avoid commingling of funds

### Manage Spending Within the Approved Budget

Monitor expenses regularly  
Ensure alignment with approved budget  
Significant changes, budget amendments, scope of project changes, often require prior written approval application revisions

### Maintain Comprehensive Documentation

Keep detailed records of:  
Financial transactions  
Receipts and contracts  
Time and effort reporting

**Documentation supports accountability and audits**



### Monitor Contractor Performance

- Establish contract administration procedures
- Ensure contractors meet performance expectations
- Recipient organization resolves contractual issues



✓ **Communicate**

**Ongoing Support Available**

- Technical assistance is available
- Questions are encouraged
- Support is available throughout the grant period

## Ensure Timely and Accurate invoicing and reporting

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- Submit all required reimbursement requests and programmatic reports
- Meet all reporting deadlines
- Late or inaccurate invoicing/reporting may result in:
  - Funding delays
  - Disallowed costs
  - Enforcement actions

✓ **Plan for Audits**

Federal grant recipients are subject to audits

Be prepared to:

- Cooperate fully
- Provide all required documentation

Strong documentation supports audit success



# Reimbursements

Deposits, Tuition and Professional Development



# Backup documents

- Reimbursement Requests
  - Detailed trial balance with all requests
  - Purchased services – contracts if applicable, invoices
  - Tuition – invoices from the School or organization providing the class
  - Travel – documents that support the local travel reimbursement policy, receipts for lodging, airfare, etc.
  - Supplies – invoices or receipts



All reimbursement requests in Grants4Me requires a detailed trial balance or fund audit report with dates that align to the service period entered on the request page. If the request for reimbursement is for purchased services, travel, supplies, or tuition reimbursement a detailed invoice is required to be uploaded along with the detailed report. At times additional documents such as those listed on this slide may be requested.

# Caution

- **Dates are Important**

- **Contracts**
  - Date of services included in the contract
  - Date the contract is signed
  - Date last invoice is to be received
- **Invoices**
  - Invoice date
  - Date ordered
  - Start and finish date of coursework



- Federal funds **will not** pay **deposits** for contractual services
- Dates are important on all legal documents such as contracts, invoices, receipts, approved requests to purchase services, the start and finish dates for coursework

Typically, contracts contain several dates such as the date the contract goes into effect, dates of service, the date the contract is signed, and dated terms and conditions. Invoices can include dates such as the terms of the services, invoice date, details within the invoice may contain dates that services were provided. Please be aware that any one of these dates will determine the date of obligation which is important. As stated earlier the date of obligation, the receipt of services or supplies, and payment made to the vendor must all fall within the period of performance for the grant supporting the expense. MMSA typically wants a deposit for their contractual services, federal funds will not pay for this deposit. Federal funds will reimburse services rendered. MMSA's invoices usually indicate the invoice is for a monthly payment against the contract, it is the SAU's responsibility to keep records indicating what services were provided for this time frame for federal audit purposes. This is to ensure compliance with the federal grant and its allowable use of funds.

# Knowledge Check

## Scenario: Using FY 26 Federal Grant to support a consultant contract

- FY 26 Application – Substantial Approval 9/1/25 (no pre-award costs granted)

In August 2025, we met with the vendor to discuss the terms and conditions of the contract. The contract was drafted and signed on 8/23/25. We will begin to receive services in October 2025 for the 25-26 school year. We want to use our FY 26 Federal Grant to support this contract.

**Is that possible?**



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The answer is no, because by signing the contract in August an obligation was made for these services. This is before the substantial approval date of the application which dictates when the funds can be obligated.



**Child Nutrition**



## Child Nutrition

### Reminders:

- Interest Earned: Any interest earned from the child nutrition funds on an investment must accrue to the school nutrition fund balance. This is stated in 7CFR 210.2.
- Federal and State Meal Reimbursement must be recorded correctly by the MEFS revenue codes. The MEFS revenue codes are listed on our Child Nutrition website if you do not have them. [Financial Information | Department of Education](#)



### Reminders:

Any interest earned from the child nutrition funds on an investment must accrue to the school nutrition fund balance.

MEFS Code Verification reminder – please make sure you are separating the Maine and Federal reimbursement funds by using the correct MEFS revenue code.

Claim Reimbursement Timeline. There is a report in CNPWeb that breaks down your reimbursement for verification of reimbursement received by month. The report is called ED293A and can be printed by your staff with CNPWeb access.



## Adult Education



## **Adult Education Updates**

**MCCA and AEFLA/IELCE are now in Grants4ME**

**New Grant and Fiscal Specialist on the Adult Ed State Team; Mike Emery  
([Michael.emery@maine.gov](mailto:Michael.emery@maine.gov))**



Deadlines –  
AEFLA/IELCE/MCCA/ SMW-Fy26 Q2 Invoices due 1/31/26

Please direct questions to [Megan.Dichter@maine.gov](mailto:Megan.Dichter@maine.gov)





## Career and Technical Education

# Career & Technical Education

## Deadlines and Reminders:

- FY26 Perkins, Perkins Reserve, Industry Standards (state) and Middle School (state) Grants
  - Aim for 75% spend down by 3/31/25
- FY27 Perkins CLNA
  - Due: Friday, Feb 27th
  - Accountability Data Training: Tuesday, Feb 3rd @ 3pm



- FY26 grants: aim to spend down funds ASAP
- FY27 Perkins comprehensive local needs assessment is due at the end of Feb. This is a requirement of Perkins every two years and is completed as an application supplement in G4M. Accountability data training for CTE directors will take place the first Tues in Feb



**ESEA Federal Programs**



# Performance Report Requirements

- Communicate, Communicate, Communicate
- Grants4Me – PR is embedded in the application and **due 11/14**
- ESEA Coordinator reports progress toward achieving measurable goals and completed projects
- Expenses from the Substantial Approval Date through 9/30/25 must be reported by the LEA Fiscal Representative or the ESEA Coordinator
- FY 23 ESEA Consolidated Grant Application must be closed out
  - This will require a LEA Fiscal Representative or ESEA Coordinator to report final expenditure under Performance Report Summary Page



Successful administration of federal funds requires communication between the business office (manager) and the ESEA Coordinator and/or school principals. This communication should be ongoing throughout the year. We recommend that a minimum of quarterly meetings occur to make sure the business office and Coordinator/s are all on the same page. Business managers need to make sure invoicing is up to date so that the ESEA Performance Report can be submitted timely. Again, invoicing for expenses through 9/30 is essential for reporting expenses on the performance report. These figures can be submitted in Grants4Me either by the ESEA Coordinator or LEA Fiscal Representative. The FY 25 performance report is a page in the FY 25 ESEA consolidated application and has been turned on to be completed and submitted by 11/14. FY 25 funds for expenses incurred 10/1 or later will not be paid until the SAU has an approved FY 25 Performance Report. FY 23 ESEA Consolidated Grant Application must be closed out. This will require a LEA Fiscal Representative or ESEA Coordinator to report final expenditure under Performance Report Summary Page.

Please reach out to either the ESEA Management Analyst or the SAU's Regional Program Manager with any questions.

## FY 26 ESEA Monitoring

- Monitoring instrument in Grants4ME
- Initial submission was **due by 1/9/26**
  
- Monitoring levels can be found on your FY 26 GAN
  - High level must complete both medium and high items



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The monitoring instrument is open, and we are encouraging SAUs that have been notified to start working on these items. The submission due date is 1/9/25 this is the latest date in which documentation can be submitted for the initial review. If you are not sure what your SAU's monitoring level is; this information can be found on the FY 26 Grant Award Notice that is a page in the application.



**Office of Special Services and Inclusive Education**



# OSSIE Fiscal Teams Updates

- The FY25 IDEA Year End Report was **DUE November 30th**. Sections to be completed include:

IDEA 611 & 619	
<a href="#">Certification and Assurances</a>	Only report inventory if the single item exceeds \$10,000
<a href="#">Maintenance of Effort</a>	Coordinated Early Intervention Services- requires 2 years of data tracking
<a href="#">Budget Summaries</a>	
<input checked="" type="checkbox"/> <a href="#">D. Inventory of Equipment Purchased with Part B Funds (Year End Report)</a>	Expenditures recorded from 07/01/2024-06/30/2025 for both School Age 611 and Preschool 619
<input checked="" type="checkbox"/> <a href="#">E. CFIS (Year End Report)</a>	
<input checked="" type="checkbox"/> <a href="#">F. Expenditures Overview: IDEA School-Age 611 (Year End Report)</a>	Attach trial balances for Fund 2470 & 2510 for the period 07/01/2024-06/30/2025
<input checked="" type="checkbox"/> <a href="#">G. Expenditures Overview: IDEA Preschool 619 (Year End Report)</a>	
<input checked="" type="checkbox"/> <a href="#">Trial Balance</a>	

- What expenses are recorded on the Year End Report?
  - All special education expenditures that have been reimbursed through Grants4ME as of June 30<sup>th</sup> (end of year 1) – Fund 2470 (5-22) and Fund 2510 (3-5) July 1, 2024-June 30, 2025
  - All expenses reimbursed through Grants4ME should be reflected on the Trial Balance – Fund 2470 and Fund 2510.
  - All expenses reimbursed through the Grants4ME should be reflected in the 4<sup>th</sup> Quarter upload to NEO.
  - Accrued payroll – NOT to be included on the YER – Accruals are liabilities not expenses.



FY 25 Year End Reports are open in the FY 25 IDEA application. The status must be changed to Revision Started in order to edit the information in the YER sections D- G and Trial Balance upload. Sections A (Maintenance of Effort), B (Excess Cost), and C (Parentally Placed Reporting) will be opening soon. The data for the MOE and Excess Cost sections are pulled from the uploaded and migrated 4<sup>th</sup> quarter actual expenditures from MEFIS and bulk loaded into Grants4ME. If SAUs are not meeting MOE based on their expenditures or reduction in student count the OSSIE fiscal team will reach out and work with districts to figure out allowable exceptions to reduce the MOE



## Common Mistakes in IDEA Billing

**Contracts, Time and Effort Certifications,  
First In, First Out, and Request vs Trial  
Balance Dates**

We are here to support you and your district.  
Don't hesitate to reach out with any and all  
questions, or if training tools would be helpful.



Semi-Annual  
Time & Effort Certification

**Example 1 – This would be signed by the employee.**

I, print name of staff, certify that I spent 100% of my time engaged in allowable Name of Federal Program (IDEA, CRF, etc.) activities for the period \_\_\_\_\_ to \_\_\_\_\_.

\_\_\_\_\_  
Signature Date (after the fact)

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Semi-Annual  
Time & Effort Certification

**Example 2 – This would be signed by an immediate supervisor.**

I, Print name of supervisor, certify that to the best of my knowledge Name of Employee, spent 100% of his/her time engaged in allowable Name of Federal Program (IDEA, CRF, etc.) activities for the period \_\_\_\_\_ to \_\_\_\_\_.

\_\_\_\_\_  
Signature Date (after the fact)

## Common Mistakes in IDEA Billing

### Let's Talk Time and Effort Certifications!

- Not provided with first submission of salaries and benefits
- Not signed and/or not dated
- Signed and dated **prior** to the **end** of the certification period



## Common Mistakes in IDEA Billing

### Let's Talk Contracts!

Initial Substantially Approved Date	7/1/2025
Project Begin Date	7/1/2025
Project End Date	9/30/2027

Initial Substantially Approved Date	8/7/2025
Project Begin Date	7/1/2025
Project End Date	9/30/2027

- Not provided with the first submission of FY26 invoice
- Not signed and/or not dated
- Signed and dated **prior** to the Initial Substantially Approved Date
- Start date of the contract is **prior** to the Initial Substantially Approved Date



Don't let funds **"expire"**!  
Prompt billing (monthly or quarterly) ensures prompt payment and full utilization of awarded amounts!

## Common Mistakes in IDEA Billing

### Let's Talk

#### Prompt Billing and First In, First Out!

- Failure to fully utilize and expend FY25 funds prior to drawing down FY26 funds (and FY27 funds once available) can put your district at risk for losing funds and may negatively impact the SAU's risk assessment score.
- Late invoicing- errors, extra documentation requirement (all vs sample), risk of not meeting the hard deadline due date, and the risk of invoices not being processed and paid out for that "one last invoice".

## OSSIE Fiscal Team Office Hours

Monthly office hours will resume for the 2025/26 school year.

### Add to your calendar:

- January 28, 10 am [invite link](#)- Topic MOE check in & budgeting 101
- February- no office hours
- March 25, 10 am [invite link](#)
- April 22, 10am [invite link](#)
- May 27, 10 am [invite link](#)



Do you have a topic you would like discussed in office hours?  
Email me: [colene.oneill@maine.gov](mailto:colene.oneill@maine.gov)



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Members of the OSSIE Fiscal team come together to offer a monthly office hours. The team focuses on fiscal matters, in addition to timely specific information. We also hope that this creates a network of colleagues and provides an opportunity for questions to be addressed with all districts present.

We share the time and content of office hours with MEASBO and also collect feedback from MEASBO.

Potential topics:

MaineCare billing /SAC billing

IDEA budgeting 101- Applications/Year End Reports

Maintenance of Effort Check in

Fiscal Audit overview

We want to hear from you, what would make it worth your time? Suggestions?



**Office of School & Student Supports**



# Office of School and Student Supports (O3S)

## Expanding Access in School Environments (EASE) – 5 or 4? Year Grant Snapshot January 2026

YEAR	Performance Period	Total Allocation Amount	Awarded	Carryover Allowed	Total # of Subrecipients	# of subrecipients that depleted funds	% of total funds remaining (based on invoices)
1	10/11/23 – 12/31/25	\$1,000,000	10/11/23 – 12/28/23	YES	9	9	0
2	6/28/24 – 12/31/25	\$1,000,000	6/28/24- 7/19/24	YES	9	8	5.9 7.2(10/23)
3	1/1/25 – 2/6/26	\$1,000,000	1/1/2025	YES 2/6/26	9	5	19.4 57.9(10/23)
4	1/1/26 – 2/6/26	\$1,000,000 (\$163,854)	1/8/2026	NO	9	9	100%
5	1/1/27 – 12/31/27	\$1,000,000	Non-Continuation	NO	9	N/A	N/A



## Stronger Connections Grant (SCG) – 3 Year Grant Snapshot - January 2026

YEAR	Performance Period	Total Allocation Amount	Awarded	Carryover Allowed	Total # of Subrecipients	# of subrecipients that depleted funds	% of total funds remaining
1 - 3	10/2/2023 – 9/30/2026	\$4,565,896	10/11/23	One time allotment	15	1	53%



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The EASE Grant had been issued a non-continuation for years 4 and 5. Several districts became more diligent in completing spending for years 2 and 3 as the 12/31/2025 obligation period approached and the expectation was that would be the last of the funding. This resulted in the number of districts that have completed spending as of 12/31/2026 is 5. Since the end of the calendar year, the multi-state lawsuit against the federal government (DOE) has had several positive rulings. A judge ruled that the government must release the year 4 allotment in full. In response we received a new GAN for limited funds with an obligation period ending 2/6/2026. This also included a carry over window for years 1-3 funds also ending on 2/6/26. What will happen after February 6th is yet to be determined. As we are rushing to get the funding in place and allocated to districts, the US DOE placed a 1-week deadline to complete the annual report due 1/16/2026. The amount of time required to compile the annual report is usually measured in weeks, not days, but our team is committed to completing the task and meeting the government deadline.

The Stronger Connections Grant has continued to drop, though slower in the last quarter due to the fall visits. Those visits resulted in a majority of districts reevaluating their remaining funding and spending objectives. We are nearly completed with amending contracts accordingly. While there is 53% of total funds remaining to be spent before 9/30/2026, we believe districts are much more focused and organized to spend down

much of their remaining funds.

## **Office of School and Student Supports (O3S)**

- McKinney-Vento Subgrants
  - Year 2 of a 3-Year Subgrant Cycle (Next RFA Spring 2027)
  - Currently funding 8 SAUs
- Preventing Student Homelessness (state-funded)
  - Reallocation for Participating SAUs in FY 25 (June 2025 and additional allocation in January 2026)
  - Revised FY 25 timeline: Obligation by March 31, 2026, and final invoices received by May 1, 2026
  - No FY 26 application available due to a reduction of funds



# Office of School and Student Supports (O3S)

- **Community School Grants (Ch. 333)**

Eligible schools interested in the Community School grant opportunity may access the RFA via the State of Maine's [Vendor Self Service \(VSS\)](#) system. This is where schools will submit questions and applications. *See the priority notice issued 01/08/26 for more information and training materials.* The Maine DOE strongly suggests schools make sure they are able to log into VSS ahead of the RFA due date.

A timeline for the RFA process is provided below:

January 20 - Information Session 3:00 (recording available)

January 27- Submitted questions due at 4pm via VSS

February 12- Proposals due at 4pm via VSS



## Office Hours

All sessions are recorded and posted to the [Office of Federal Program's website](#)

- Shared with MEASBO for distribution

Next session: **March 26, 2026 at 10 am.**

Please ensure you [register using the link](#) available on the Maine Professional Learning Calendar.



# Team Office Hours

Team	Office Hour
ESEA Federal Programs	<a href="#">Second Tuesday of the month at 9:00 am</a>
Perkins V (CTE)	First Tuesday of the month 3-4pm on <a href="#">Teams</a>
Federal Fiscal Office Hours	March 26, 2026, <a href="#">Register</a> May 28, 2026, <a href="#">Register</a>
Special Education Office Hours	See Team update page for dates
McKinney-Vento and Foster Care Office Hours	First Thursday of the month 3-4pm on <a href="#">Zoom</a>



Register for Federal Fiscal office hours here:

<https://networkmaine.zoom.us/meeting/register/tZAlc-usrz4rH92YKUFTyP5obu8SdjBc0TDs>

## Questions

Any questions for the team?



**QUESTION**

Where exactly in the CFR does it say all signatures, vs those of the organization obligating the funds, have to be dated no earlier than the date of substantial approval? I would argue that a district has not obligated funds until a representative of the district has signed a contract. This has been an issue for us. We negotiate contracts with service providers prior to July 1 so that services are available on July 1. The RSU's representative's signature is dated July 1 (or later, depending on date of substantial approval). However, service providers are inclined to date their signature on the date they sign the contract, often prior to July 1. The service provider doesn't obligate the RSU - the signature dated July 1 (or later) obligates the RSU.

**RESPONSE**

34 CFR § 76.707 states that an obligation for personal services by a contractor who is not an employee of the subgrantee is on the date on which the subgrantee makes a binding written commitment to obtain the services. In addition, 34 CFR 76.708 states that the State may not authorize an applicant to obligate funds until the applicant submits its application to the State in substantially approvable form. Auditors and federal program officers interpret 34 CFR § 76.708(a)(2) combined with 2 CFR § 200.309 to mean that the legal obligation, the contract, cannot be finalized before the approval date.

Accordingly, all contracts must be initiated by the SAU and must not be signed until after the substantial approval date. A contract constitutes an intent to purchase services, neither party may initiate or execute a contract before the application has received substantial approval. For example, if the vendor signs on June 15, and the SAU signs on July 1, the contractual obligation exists as of June 15. Federal auditors often look for the earliest date on the document to determine when the liability was created.



Our Team

## Contacts

Please reach out to the applicable Fiscal Program leads for additional help and support.

Office	Contact	Email
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Child Nutrition	Jodi Truman	<a href="mailto:Jodi.Truman@maine.gov">Jodi.Truman@maine.gov</a>
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