



LEVERAGING FEDERAL FUNDS TO MEET STUDENT NEEDS

NATIONAL ESEA CONFERENCE

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OBJECTIVES

LEVERAGING FEDERAL FUNDS TO MEET STUDENT NEEDS

- Discuss the requirements and authorized activities for various ESEA formula grant programs, McKinney-Vento, and IDEA
- Provide specific examples of the use of federal funds for these programs
- Provide examples of coordinating funds based on the profile of a child



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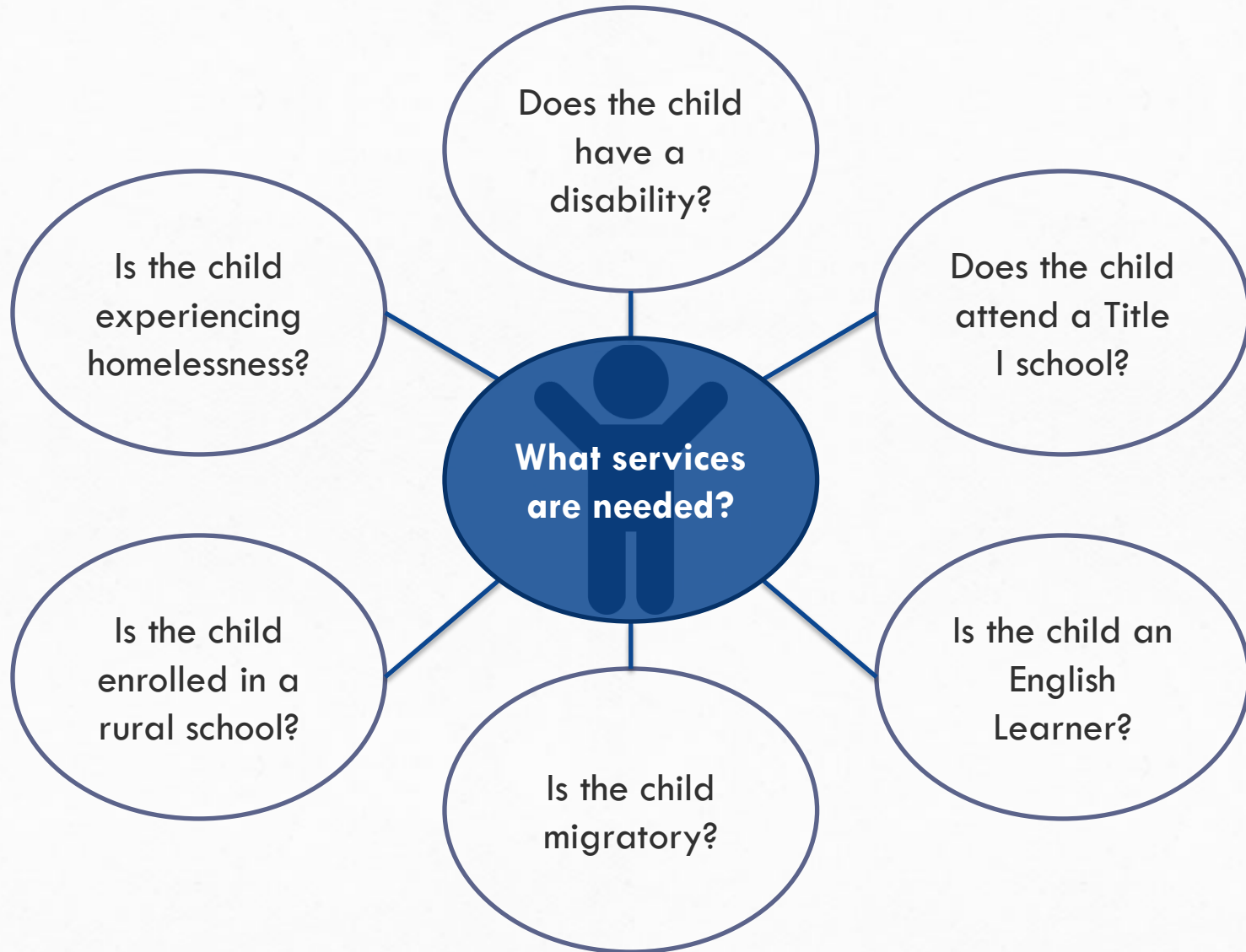
- Kay Rigling





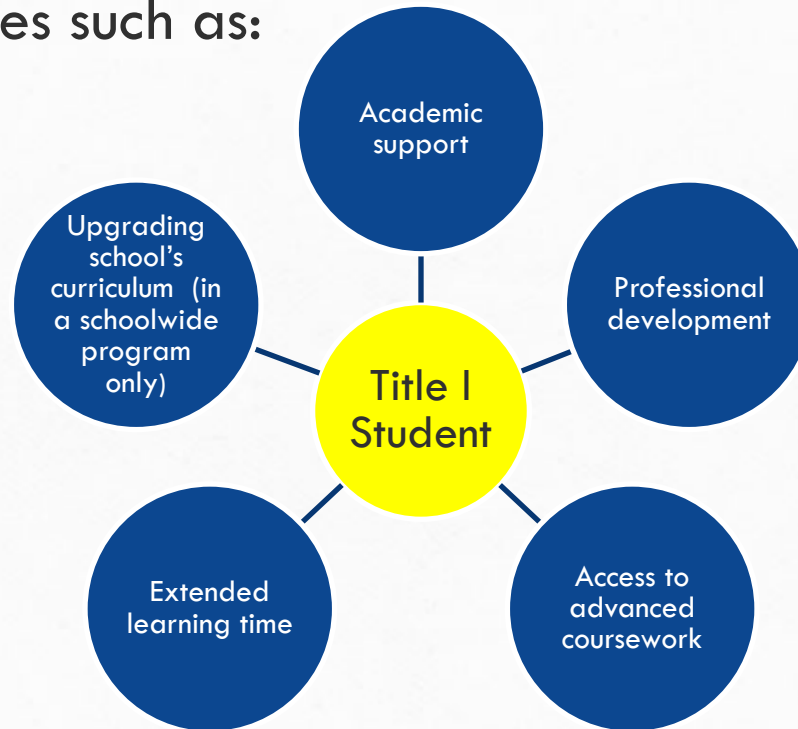
Focusing on the Needs of Each Student

INTERSECTION OF FEDERAL PROGRAMS



INTERSECTION OF TITLE I, PART A

If a student attends a Title I school*, Title I, Part A funds can be used for activities such as:



* A “Title I school” receives a Title I allocation from its LEA and operates a schoolwide program or a targeted assistance program.

Key Considerations

- Schoolwide programs: Title I, Part A funds can serve all students as a means to upgrade the instructional program in the whole schools to improve the achievement of low-achieving students and may be consolidated with other Federal and non-Federal funds to increase flexibility and reduce burden [ESEA sections 1114].
- Targeted Assistance programs: Title I, Part A funds serve only students that the school identified as failing or most at risk of failing to meet challenging State academic standards based on multiple educationally related criteria [ESEA section 1115].

TARGETED ASSISTANCE PROGRAMS

ESEA SECTIONS 1115 AND 1118(b)(2)

- Title I, Part A funds serve only students that a school identifies as failing or most at risk of failing to meet challenging State academic standards based on multiple educationally related criteria.
- Thus, only a subset of students in a Title I targeted assistance program are Title I students.
- A Title I targeted assistance program must receive all the State and local funds that it would have received if it were not a Title I school.



SCHOOLWIDE PROGRAMS

ESEA SECTIONS 1114(a)(1)(A), 1114(a)(3)

- If at least 40 percent of students in a Title I school are from low-income families, the school may implement a schoolwide program.
- A State may grant a waiver for a school with fewer than 40 percent of students from low-income families to implement a schoolwide program if it will best serve the needs of students in the school who are failing, or at risk of failing, to meet the challenging State academic standards.



SCHOOLWIDE PROGRAMS

ESEA SECTIONS 1114(a)(1)(A), 1114(a)(3), 1118(b)(2)

- A schoolwide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school in order to improve the achievement of the lowest-achieving students by coordinating services funded from a variety of sources into a comprehensive framework.
- A schoolwide school is not required to identify specific students as eligible to receive Title I, Part A services and it must receive all the State and local funds that it would have received if it were not a Title I school, including State and local funds needed to provide services required by law for children with disabilities and English learners.



SCHOOLWIDE PROGRAMS

ESEA SECTIONS 1114(a)(1)(A), 1114(a)(3), 1118(b)(2)

- A school implementing a schoolwide program must do a comprehensive needs assessment and develop a schoolwide plan, which it must monitor regularly to determine its effectiveness.



SCHOOLWIDE PROGRAMS

ESEA SECTION 1114(a)(1)(A), 1114(a)(3)

- A school implementing a schoolwide program may consolidate funds from Title I, Part A and other Federal education programs with State and local funds.
- This enables the school to use all of its funds to meet the specific needs of its students identified through its needs assessment and included in the schoolwide plan.

For more information, please see the ESEA non-regulatory guidance on schoolwide programs, available at <https://www2.ed.gov/policy/elsec/leg/essa/essaswpguidance9192016.pdf>



KNOWLEDGE CHECK

True or False?

A schoolwide program must consolidate funds from other Federal programs and State and local funds with Title I, Part A funds to include these programs in its schoolwide plan.

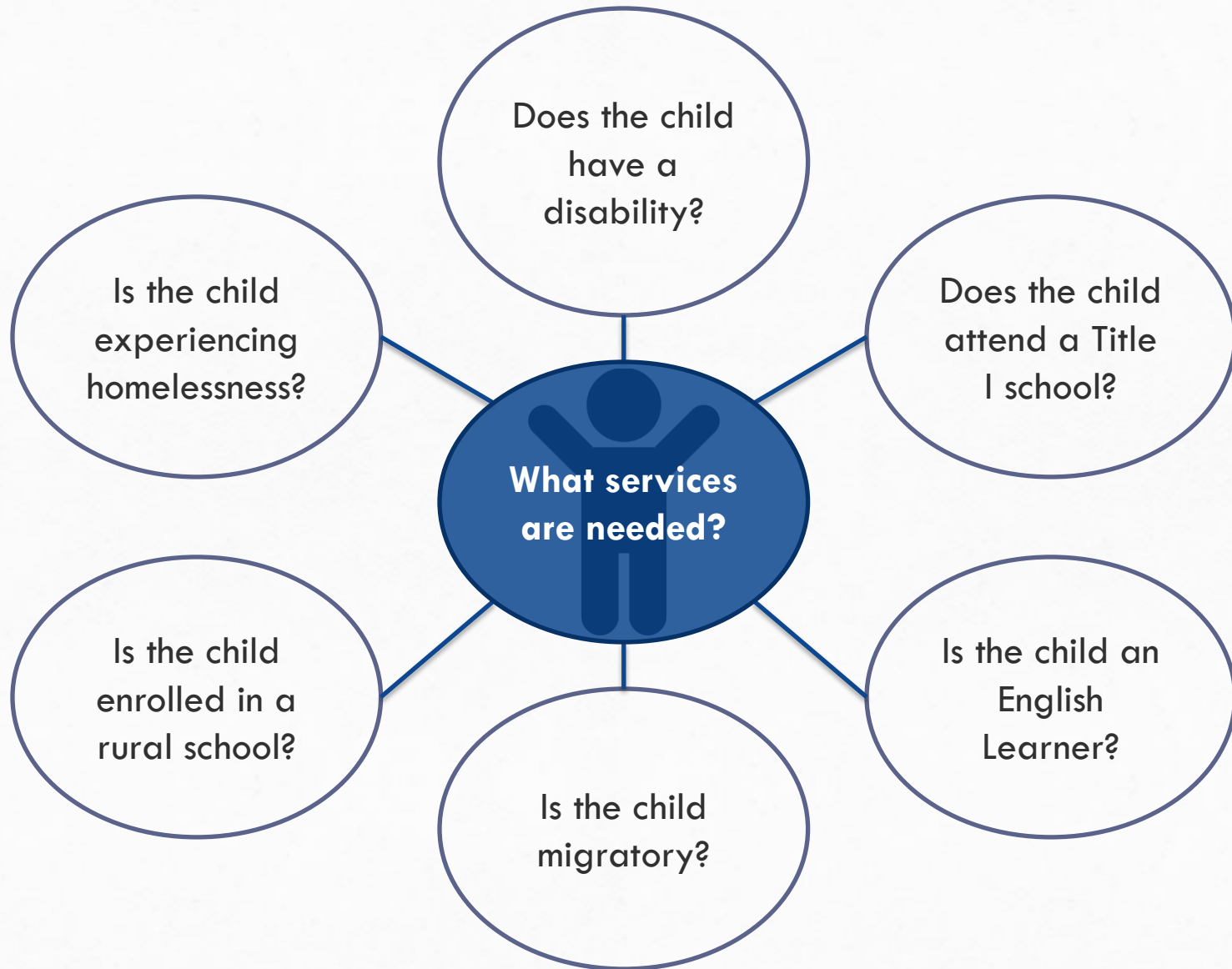
KNOWLEDGE CHECK

False.

The schoolwide plan may incorporate activities supported by other Federal programs and State and local funds regardless of whether it consolidates. However, consolidating Federal, State, and local funds is a schoolwide program best leverages the use of those funds for the benefit of students in the school.

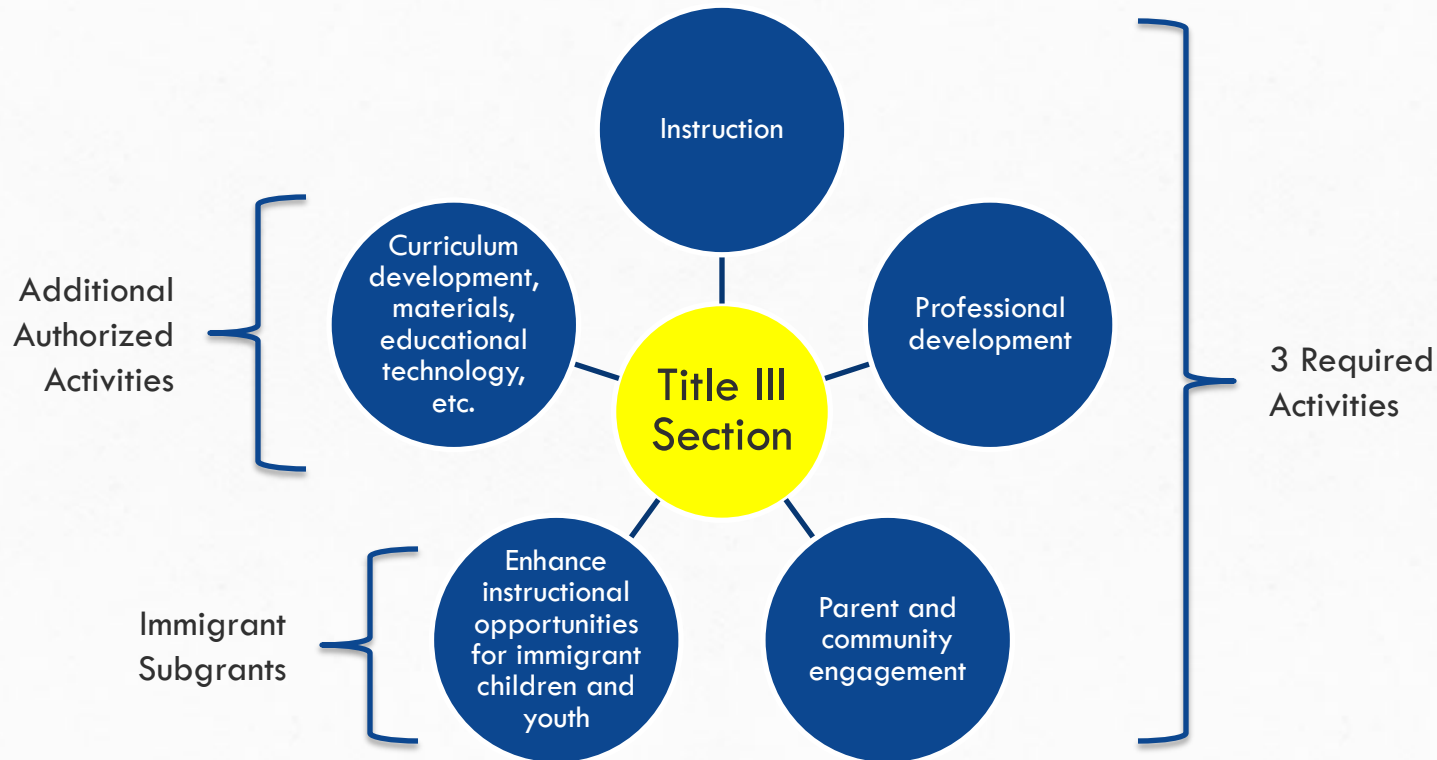


INTERSECTION OF FEDERAL PROGRAMS



INTERSECTION OF TITLE III, PART A

If a student is identified as an English learner (EL), Title III formula funds can be used by LEAs for:



Key Considerations

- EL Portion: No more than 2% of LEA allocated funds for direct administrative purposes. This does not apply to the immigrant subgrants.
- Supplemental to local, State and other Federal funds

CONSIDERATIONS WHEN USING TITLE III FUNDS

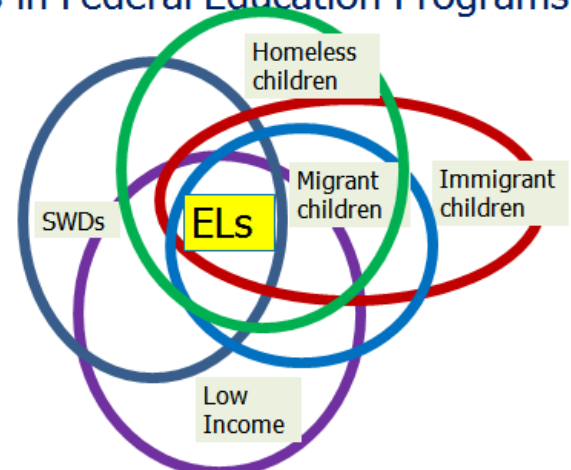
- Title III is a district-level subgrant. However, a State may NOT allocate a subgrant if the amount of the allocation is less than \$10,000.
- LEAs have use of their Title III subgrants for 27 months (no carryover limit under Title III).
- LEAs are limited to the use of only 2 percent for administration costs.



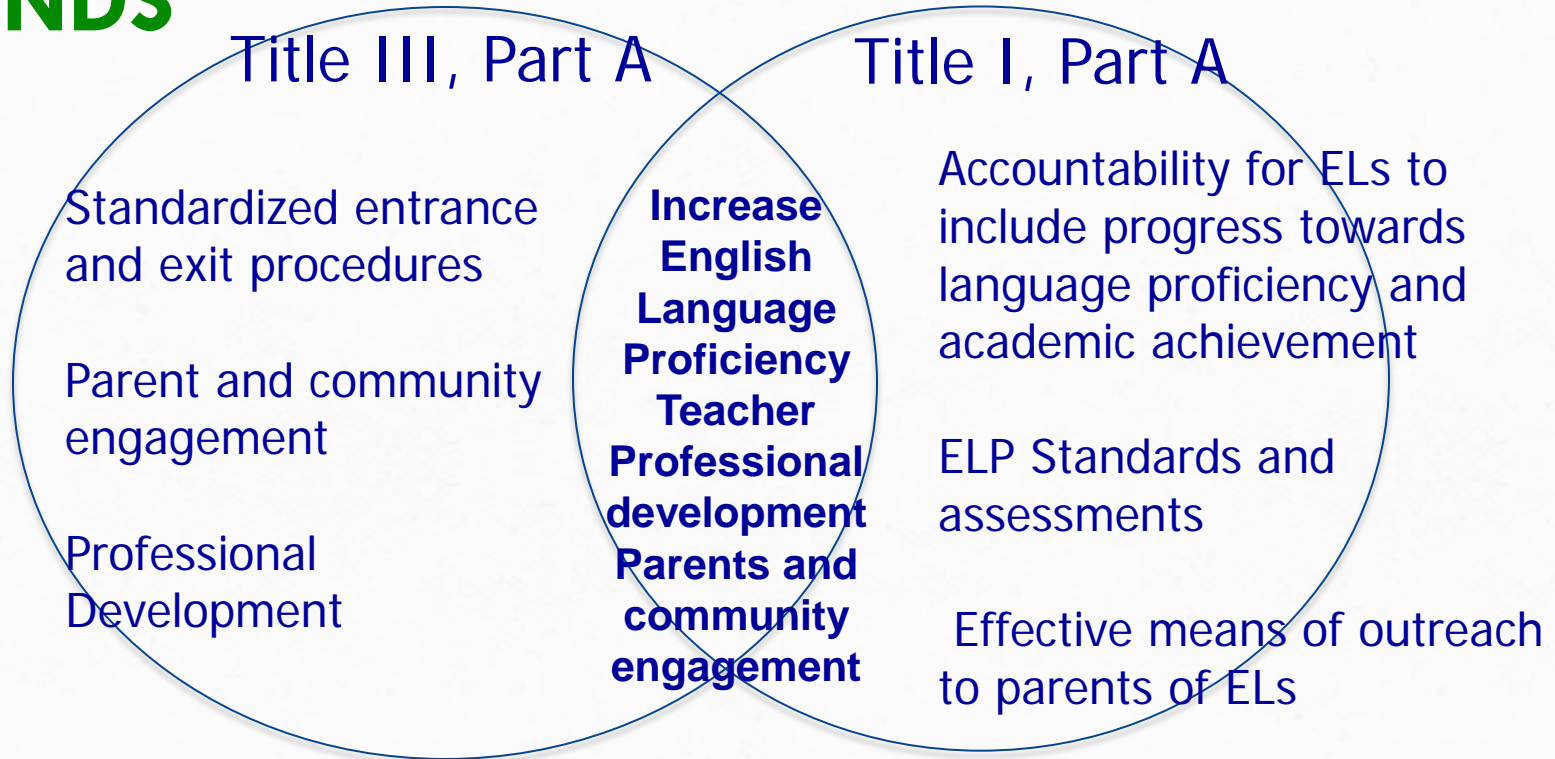
CONSIDERATIONS WHEN USING TITLE III FUNDS

- Title III funds must be used to supplement the level of Federal, State and local funds.
- Title III funds can be used to provide an instructional program/service that is in addition to or supplemental to an instructional program/service that would otherwise be provided to ELs and immigrant children and youth (or be required to be provided by other laws/regulations) in the absence of a Title III grant (e.g., Lau requirements under civil rights obligations).

ELs in Federal Education Programs



CONSIDERATIONS WHEN USING TITLE III FUNDS

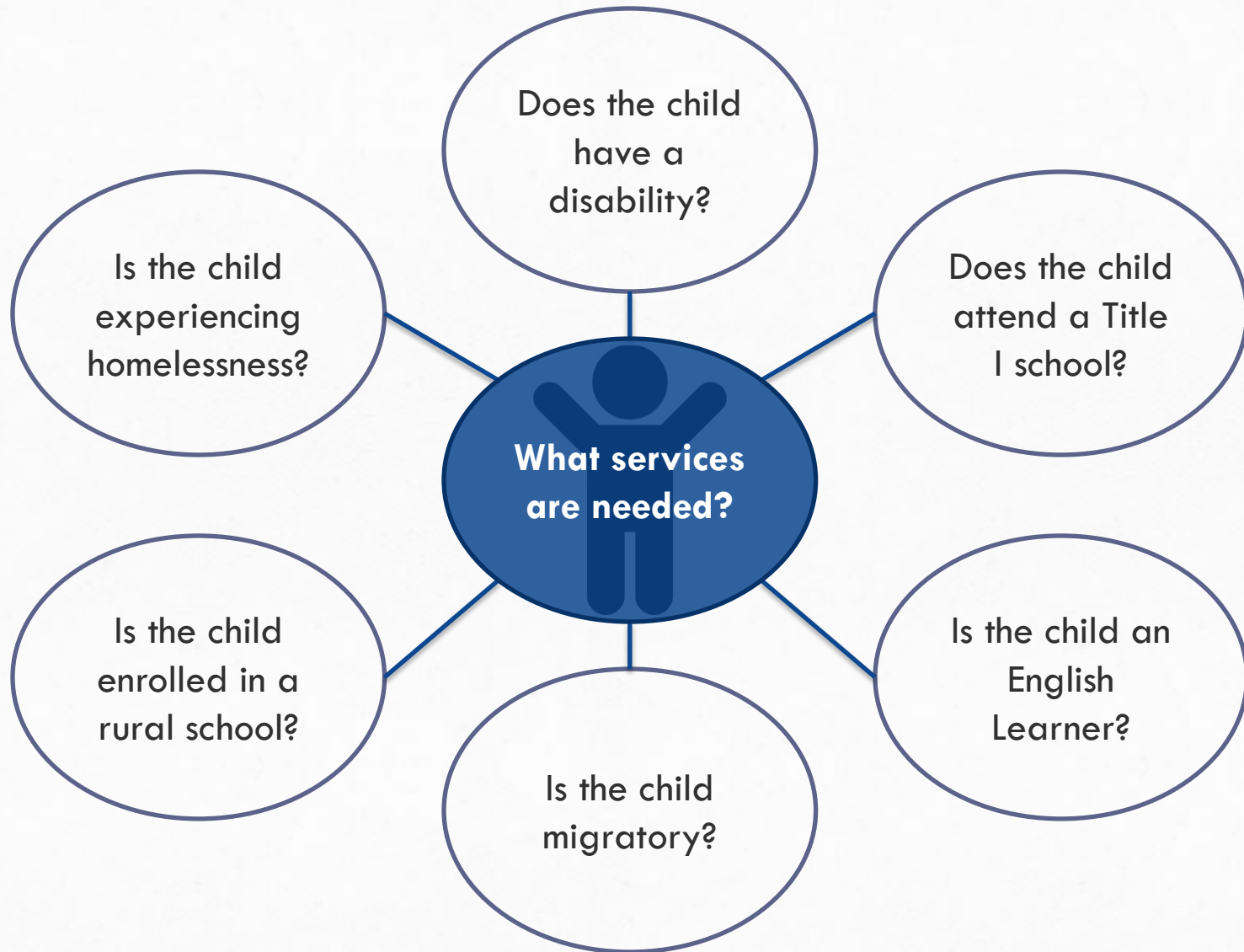


States and LEAs may continue to use Title III funds to carry out activities relating to ELs that have been moved from Title III to Title I in certain circumstances. See guidance on Title III under ESSA (question A4). A State or LEA may (generally) also use Title I funds for certain EL activities that have been moved from Title III.

www2.ed.gov/policy/gen/guid/significant-guidance.html

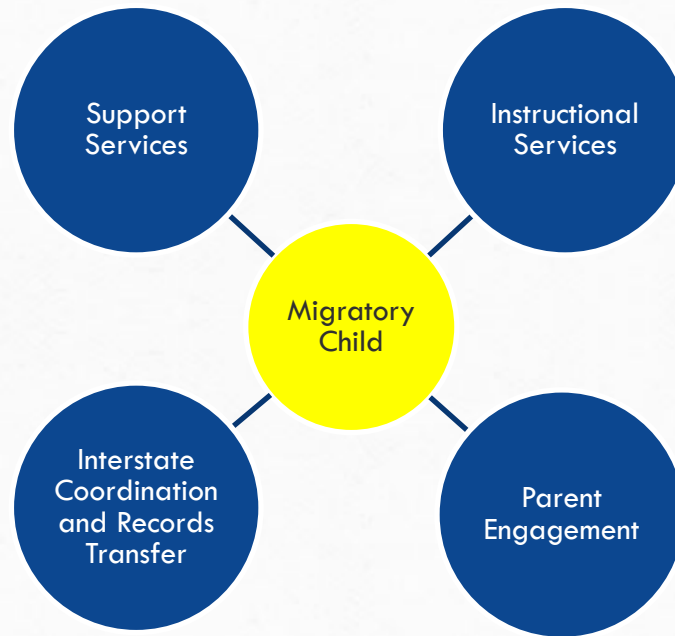


INTERSECTION OF FEDERAL PROGRAMS



INTERSECTION OF TITLE I, PART C

If a child is identified as migratory, Title I, Part C funds can be used for activities such as:



* Children who are identified as Priority for Services must be served first.

Key Considerations

- Address needs in the MEP statewide comprehensive needs assessment and service is aligned to strategies in the MEP statewide service delivery plan
- Address needs not already addressed by other federal or non-federal programs
- Supplement non-federal funds
- Before consolidating Title I, Part C funds into a schoolwide program, the needs of migratory students must have been met.

CONSIDERATIONS WHEN USING TITLE I, PART C FUNDS

- **Does the activity or service address a need identified in the MEP statewide comprehensive needs assessment (CNA)? Is the activity or service aligned to the strategies in the MEP statewide service delivery plan (SDP)?**
 - ESEA section 1304(c)(1)(A) requires that funds be used in accordance with the statewide CNA and SDP required in ESEA section 1306.
- **Is the need already addressed by services available from other programs?**
 - In general, ESEA section 1306(b)(2) requires that MEP funds be used to address the needs of migratory children not addressed by services available from other Federal and non-Federal programs.



CONSIDERATIONS WHEN USING TITLE I, PART C FUNDS (CONTINUED)

- **Does the activity or service supplement, and not supplant, non-Federal funds?**
 - ESEA section 1304(c)(2) requires that MEP programs and projects be carried out in a manner consistent with the objectives of ESEA section 1118(b).
- **Are the costs reasonable and necessary, and allocable (i.e., chargeable) to the MEP relative to the benefit received?**
 - See the Uniform Guidance (2 CFR Part 200, subpart E) for information about the cost principles.
- **Are the funds being used to meet the identified needs that result from the children's migratory lifestyle and to permit the children to participate effectively in school?**
 - ESEA section 1306(b)(1) requires that MEP funds must first be used to meet the identified needs of migratory children that result from their migratory lifestyle and to permit the children to participate effectively in school.



CONSIDERATIONS WHEN USING TITLE I, PART C FUNDS (CONTINUED)

- **Before consolidating Title I, Part C funds into a schoolwide program, a school must:**
 - Consult with migratory parents,
 - Meet the unique educational needs of migratory students that result from their migratory lifestyle and other needs that are necessary to permit migratory children to participate effectively in school, and
 - Document that these have been met.

ESEA Section 1306(b)(4) and 34 CFR 200.29(c)(1)



KNOWLEDGE CHECK

True or False?

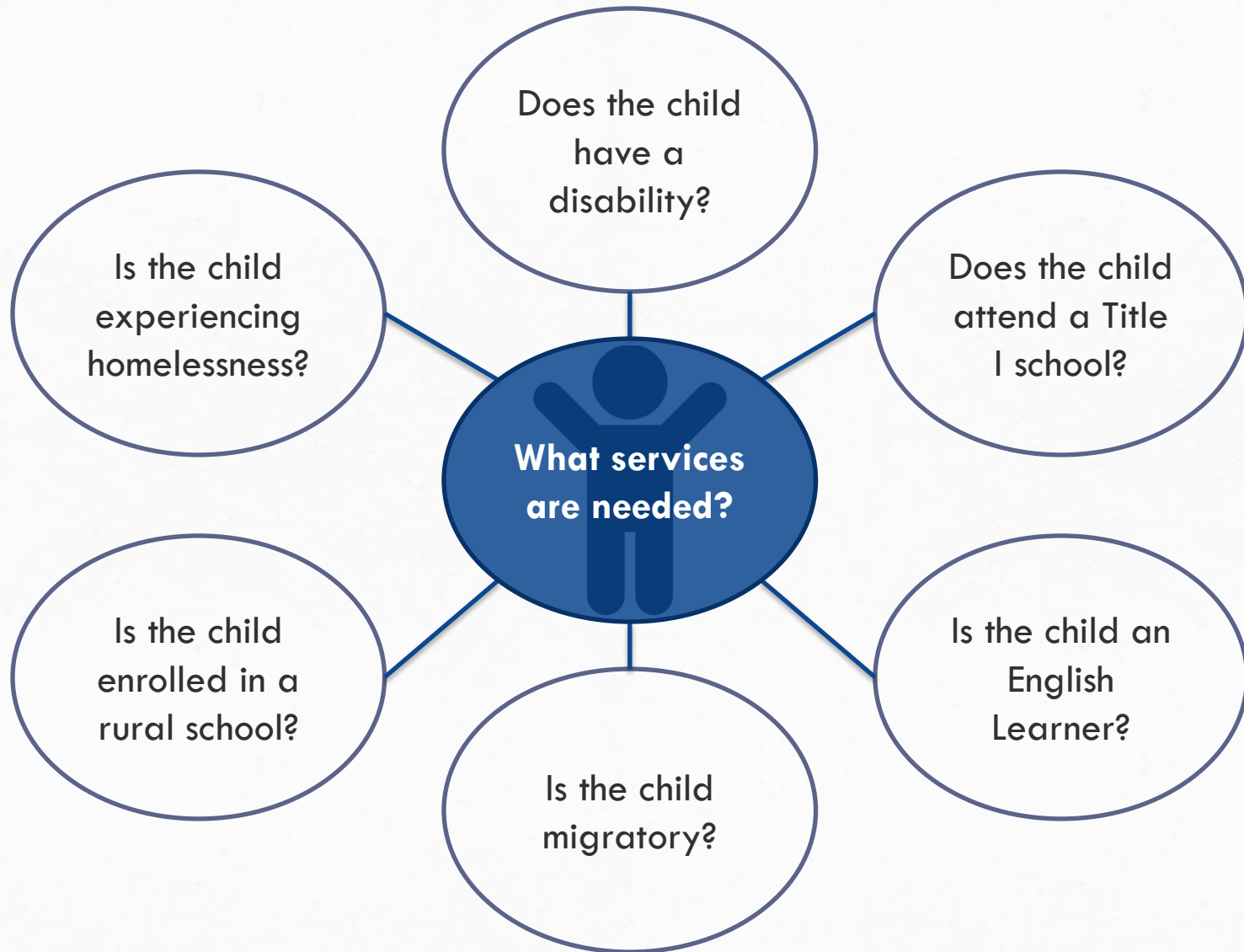
MEP-funded activities or services must be aligned to a strategy/strategies in the State's MEP statewide service delivery plan?

KNOWLEDGE CHECK

True.

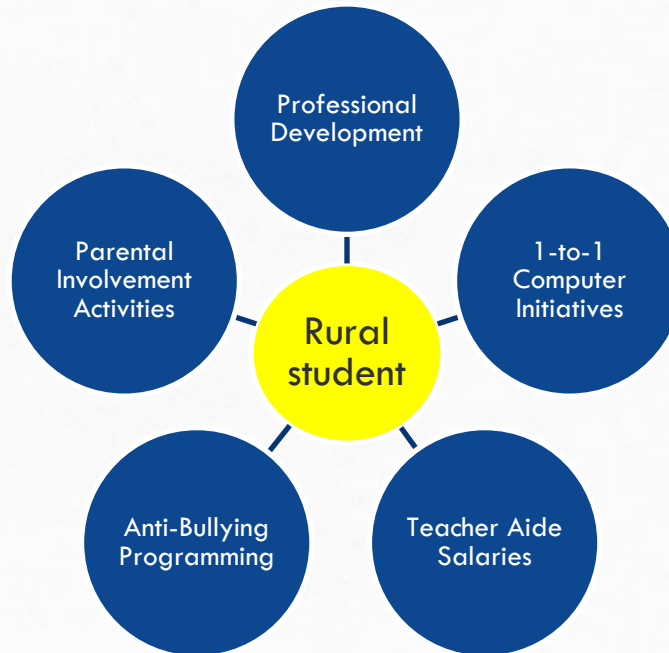
Activities and services paid for with MEP funds must be aligned to the State's MEP comprehensive needs assessment and service delivery plan.

INTERSECTION OF FEDERAL PROGRAMS



INTERSECTION OF TITLE V, PART B

If a student is enrolled in a rural, small or low-income school, Title V, Part B funds can be used for:



Key Considerations

- SRSA and the Alternative Fund Use Authority (AFUA)
- Parental Involvement Activities
- Professional learning
- Activities allowable under Title I, Part A, Title II, Part A, Title III, and Title IV, Part A

TITLE V, PART B

RURAL EDUCATION ACHIEVEMENT PROGRAM

- **Purpose:** To address the unique needs of rural school districts, that often lack personnel and resources needed to effectively compete for federal and frequently receive formula grant allocations in amounts too small to be effective in meeting their intended purposes
- REAP Consists of two supplemental formula grants:
 - **Small, Rural School Achievement (SRSA) Grant**
 - Department administers directly to LEAs
 - **Rural, Low-Income School (RLIS) Grant**
 - Department administers to States; States award sub-grants to LEAs



SRSA ALTERNATIVE USES OF FUNDS

ESEA SECTION 5211

- Districts eligible for the SRSA program under Title V, Part B of the ESEA have flexibility in using the formula grant funds they receive under certain State-administered ESEA programs. This flexibility is the Alternative Fund Use Authority (AFUA).
- A district eligible for AFUA may use formula funds received under Title II, Part A or Title IV, Part A for any allowable activity under Title I, Part A; Title II, Part A; Title III; or Title IV, Parts A or B.



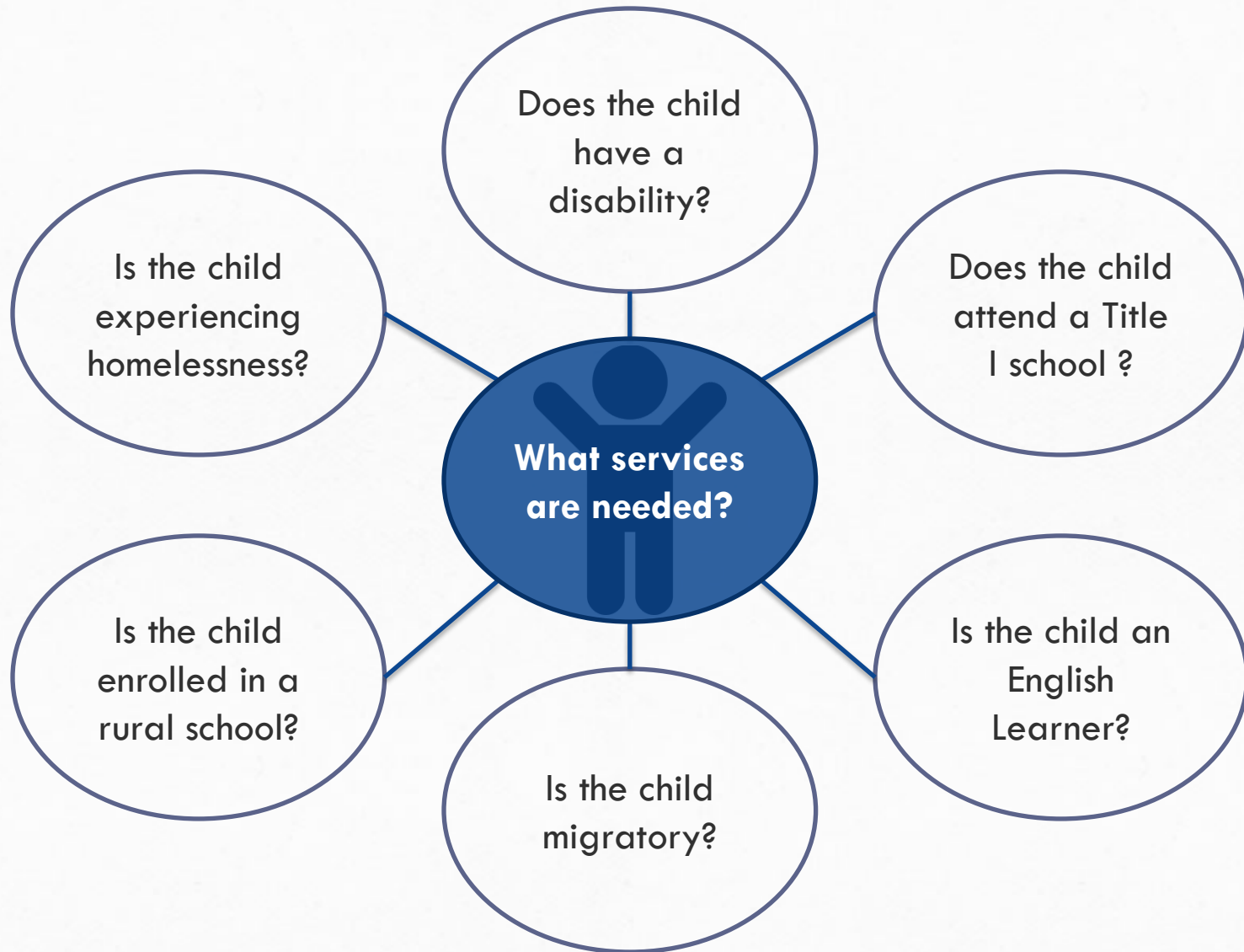
SRSA ALTERNATIVE USES OF FUNDS

ESEA SECTION 5211

- Annually, before exercising AFUA, an eligible district must notify its State of its intent to do so by the notification deadline established by the State.
- AFUA is available only to SRSA-eligible districts (it differs in this way from transferability, which is available to all districts).
- While districts exercising transferability actually transfer funds from one program to another, districts exercising AFUA do not.

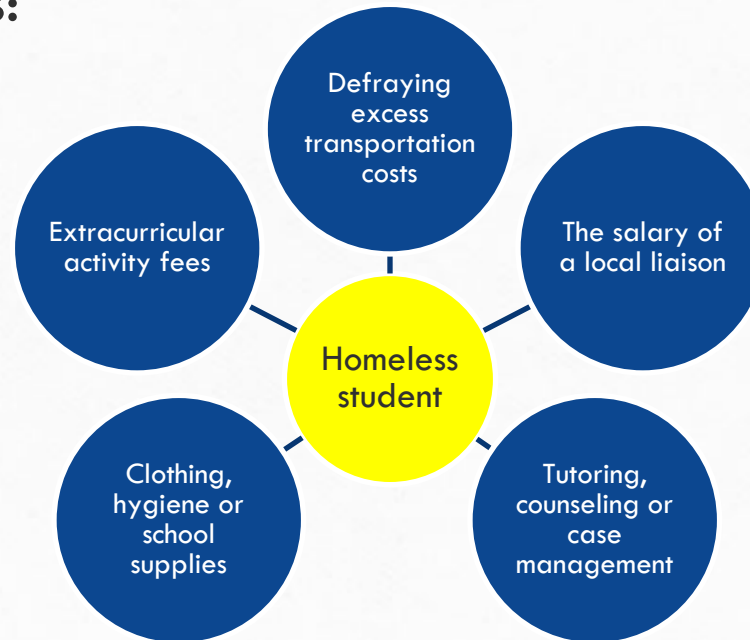


INTERSECTION OF FEDERAL PROGRAMS



INTERSECTION OF MCKINNEY-VENTO

If a student is identified as a homeless student, Title I, Part A set-aside or McKinney-Vento subgrant funds can be used for expenses such as:



Key Considerations

- All LEAs with homeless students enrolled receiving Title I, Part A grants must set aside something (e.g., a per pupil amount or based on a needs assessment)
- Many educationally related support services may be funded (on a necessary and reasonable basis) as long as the student is homeless.

PROCESS FOR ALLOWING USES OF FUNDS IN EHCY PROGRAM

- **Does the proposed activity address a need stated in the subgrant program or project needs assessment?**
 - For EHCY, this requirement is in [42 U.S.C. § 11433] Sec. 723(b)(1); for Title I, Part A LEA homeless set-aside see EHCY non-regulatory guidance M-5 to M-8.
- **Is the use of funds allocable? For example, in EHCY does it serve homeless students?**
 - Due to the prohibition on separating homeless students, EHCY funds can serve about 5% of students who are at-risk of homelessness. (See EHCY non-regulatory guidance B-1, H-3, J-5)
 - Students who no longer homeless are eligible for transportation until the end of the school year in which they are housed.



PROCESS FOR ALLOWING USES OF FUNDS IN EHCY PROGRAM (CONTINUED)

- **Is the use of funds allowable?**
 - EHCY subgrants have 16 broad authorized activities. (ESEA section 723(d))
 - With so many options, refer to EHCY program evaluation or performance data to determine what's been effective.
- **Is the use of funds necessary and reasonable for accomplishing the purposes of the grant program or objectives of the subgrant project? (see Uniform Guidance)**
 - We look at per pupil funding amounts as a proxy to see if other needs and objectives are also addressed. All students are served in proportion to educational need.
 - In reviewing the quality of LEA subgrant applications, SEAs must look at the use of EHCY funds to leverage other funding resources. (ESEA section 723(c)(3)(G))



KNOWLEDGE CHECK

True or False?

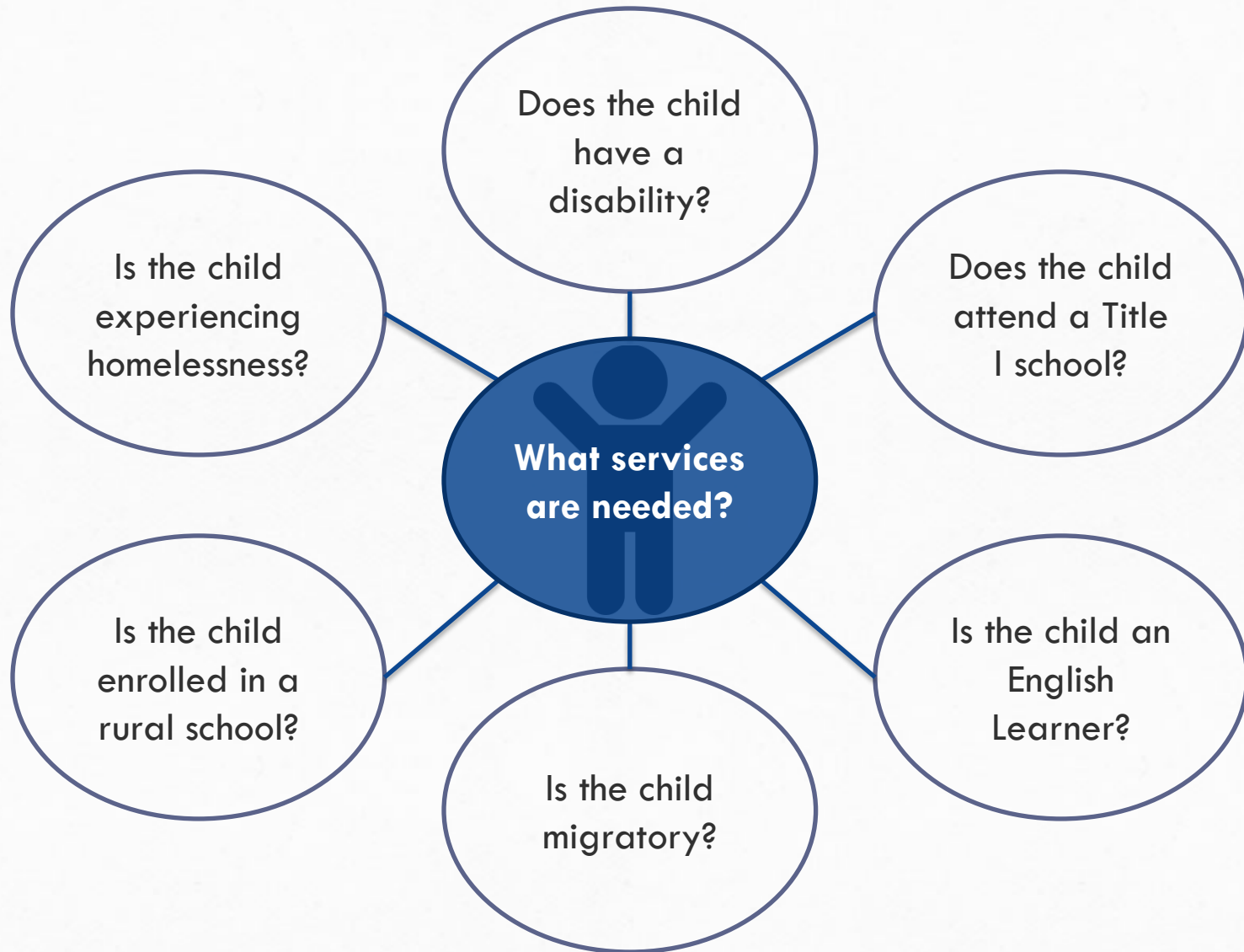
McKinney-Vento EHCY subgrant funds may be used to pay for soap and shampoo.

KNOWLEDGE CHECK

True.

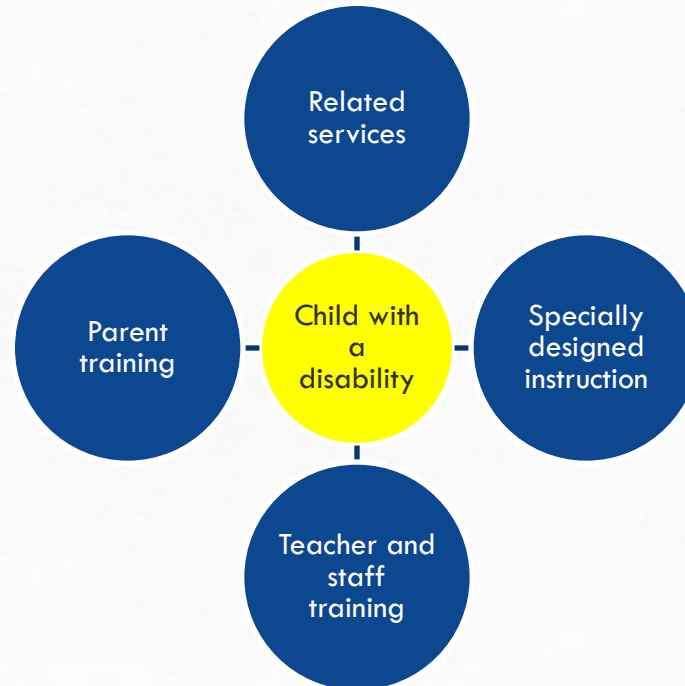
We encourage LEAs to look for other community and district resources first, but, if they have a subgrant and this is a need for attending school, an LEA may use subgrant funds to purchase these items.

INTERSECTION OF FEDERAL PROGRAMS



INTERSECTION OF IDEA

If a student is identified as a child with a disability, IDEA Part B funds can be used for activities such as:



Key Considerations

- Related Services - Transportation and such developmental, corrective, and other supportive services as are required to assist a child with a disability to benefit from special education. Related services also include parent counseling and training [34 CFR section 300.34]
- Specially designed instruction as defined by 34 CFR section 300.39
- Personnel development to ensure the provision of a free appropriate public education (FAPE) to children with disabilities [34 CFR section 300.156(a) and (d)].

OTHER FEDERAL PROGRAMS

In addition, consider potential support from other Federal programs, including:

- **Title II, Part A:** Improves the quality and effectiveness of teachers and school leaders to increase student achievement
- **21st Century Community Learning Centers:** Establishes or expands community learning centers to provide students with opportunities for academic enrichment and various additional services to reinforce and complement their regular academic program, and to provide parents with opportunities for meaningful engagement with their children's education



OTHER FEDERAL PROGRAMS

- **Title IV, Part A:** Builds capacity for SEAs and LEAs to provide students with access to a well-rounded education, improve school conditions for student learning, and improve use of technology to increase academic achievement
- **Title VI, Part A:** Provides funds directly to LEAs and other eligible entities that have American Indian/Alaska Native students to meet the unique cultural, language, and educational needs of such students
- **Title I, Part D, Subpart 2 (Local Agency or LEA Neglected or Delinquent Education program):** Allows funds to serve a broad range of at-risk students for educational support services



COORDINATING FUNDS

SCENARIOS

In the following examples, we show profiles of children and how various programs can be coordinated to provide services based on the needs/profile of each child.

- Example 1 – EL, migratory child attending a Title I targeted assistance school
- Example 2 – EL, homeless student attending a non-Title I high school
- Example 3 – A homeless child with a disability attending a rural school that operates a Title I targeted assistance program



EL, MIGRATORY CHILD ATTENDING A TITLE I TARGETED ASSISTANCE SCHOOL

Assessing Student Needs

- What is the student's educational background? What classes is the student missing?
- How will the school ensure that teachers receive professional learning to address the student's needs?
- How will the school involve the student's parents?
- How will the school ensure the student is acclimating to a new environment?
- What is the child's EL proficiency level?

Examples of Federal supports

- Services to help with current courses or to recover credit (IA, IC)
- Supplemental services to help develop English proficiency (IIIA)
- Parent activities that relate to student's learning (IA, IC, IIIA).
- Professional learning activities (IC, IIA, and IIIA)
- Engagement activities to cultivate a sense of belonging (IC)
- Assistance with student records transfer (IC)

* *Other federal program funds may also be used*





EL, HOMELESS CHILD ATTENDING A NON-TITLE I HIGH SCHOOL

Assessing Student Needs

- What is the child's EL proficiency level?
- How will the school ensure that teachers receive professional learning to address the student's needs?
- How will the school involve the student's parents?
- What educationally related supports does the child need?
- Does the child need transportation to the school of origin?

Examples of Federal supports

- Additional educational services for classes such as tutoring or after school programs (IA, MV)
- Supplemental services to help with English proficiency (IIIA)
- Activities for parents related to the student's rights and learning (IIIA, MV)
- Professional learning for staff to understand the student's social/emotional needs (IIA, MV)
- Pay extra transportation costs to attend school of origin (IA, MV)

* Other federal program funds may also be used





HOMELESS CHILD WITH A DISABILITY ATTENDING A RURAL SCHOOL THAT OPERATES A TITLE I TARGETED ASSISTANCE PROGRAM

Assessing Student Needs

- How will the school ensure that teachers receive professional learning to address the student's needs?
- How will the school include the student's parents?
- How will the school address the student's social/emotional needs?
- What additional instruction is needed for lost work?
- How will the school ensure FAPE is made available to the student?

Examples of Federal supports

- Additional educational services to help with classes (IA, VB, MV)
- Activities for parents related to student learning (IA, MV, VB, IDEA)
- Additional educationally related support services outside regular school day (IA, VB, MV)
- Services and professional learning to address social/emotional needs (IA, MV, VB)
- Incorporation of technology learning into classroom

* Other federal program funds may also be used



CONSOLIDATING FUNDS IN A TITLE I SCHOOLWIDE PROGRAM

- The ESEA authorizes a schoolwide program school to consolidate and use funds under Title I, Part A, together with other Federal, State, and local funds, in order to upgrade the entire educational program of the school.
- In general, a schoolwide program may consolidate funds that it receives from any program administered by ED that can be used in a public elementary or secondary school.
- Some funds can only be consolidated under certain conditions (e.g., Title I, Part C; Title VI, Part A; IDEA, Part B)

See page 8-10 of ED's Schoolwide Guidance for additional information:

<https://www2.ed.gov/policy/elsec/leg/essa/essaswpguidance9192016.pdf>.



CONSOLIDATING FUNDS IN A TITLE I SCHOOLWIDE PROGRAM

Consolidating funds enables a schoolwide program school to:

- More effectively design and implement a comprehensive plan to upgrade the school's entire educational program based on its comprehensive needs assessment.
- Use the consolidated funds to support any activity of the schoolwide program without regard to which program contributed the specific funds used for a particular activity.
- Avoid having to meet most of the statutory and regulatory requirements of the specific Federal programs included in the consolidation, provided it meets the intent and purposes of those programs.





CONSOLIDATED FUNDS SCENARIO

HOMELESS, EL STUDENT WITH A DISABILITY IN A SCHOOLWIDE SCHOOL THAT CONSOLIDATES* TITLE I, PART A, TITLE II PART A, TITLE III PART A, TITLE IV PART A, TITLE V, PART B AND IDEA FUNDS WITH STATE AND LOCAL FUNDS

Assessing Student Needs

- Does the student need assistance with transportation to school of origin?
- How will the school ensure that the student's teachers receive appropriate professional learning?
- How will the school include the student's parents?

*Consistent with all ESEA and IDEA requirements.

The consolidated funds may pay for:

- Any activities that meet the student's needs included in a comprehensive schoolwide program plan based on the school's comprehensive needs assessment.



RESOURCES

- <https://www2.ed.gov/programs/reapsrsa/index.html>
- <https://sites.ed.gov/idea/>
- <https://www2.ed.gov/programs/mep/mepnonregulatoryguidance317.docx>
- <https://www2.ed.gov/programs/homeless/legislation.html>
- <https://nche.ed.gov/topics/>



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Questions?

