

Office of Federal Programs Newsletter September 2019

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INFORMATION FOR MULTIPLE FEDERAL FUNDING STREAMS

The Office of Federal Programs is addressing topics of high interest regarding the use of federal funds, allowable and non-allowable expenditures, flexibilities, etc. For more clarification, the assigned OSDE reviewer may be contacted directly by each district.

Braided - Blended Funding Streams

Layering or blending and braiding multiple funding streams is a process for using multiple funding streams to support a common activity, initiative, or project.

- *Blending* refers to wrapping funds from two or more funding sources *together* to fund a specific part of a program or initiative. In blending, costs are not necessarily allocated and tracked by individual funding sources. Blending federal funding streams requires specific statutory authorization. **(i.e., Title I, Part A - Schoolwide consolidation of funds)**
- *Braiding*, two or more funding sources are *coordinated* to support the total cost of a single service. There is no statutory authority required for braiding federal funding streams. Expenditures are tracked by different categories of funding sources. In braiding, cost-allocation methods are required to ensure that there is no duplicate funding of service costs and that each funding source is charged to the designated funding stream.

A school wide plan is a compliant plan that includes the school's activities demonstrating the intent and purposes of the consolidated federal programs. Depending on the level of consolidation, the LEA may attribute expenditures to particular fund sources without regard to whether the funds actually support particular fund source as long as the expenditures support the school wide plan.

Levels of school wide consolidation plans and benefits for Oklahoma schools:

- Only Title I funds support the school wide plan; no funds are consolidated, least amount of flexibility;
- Consolidates only federal funds in a school wide plan, and has moderate amount of flexibility, funds lose program-identity, but not federal identity, and should meet the educational needs of the school identified in needs assessment and comprehensive school wide plan;
- School wide program plans are not required to meet *school-level* statutory or regulatory requirements, the plans need to address intents and purposes of combined programs AND ensure that the needs of the intended beneficiaries of these programs are addressed;
- School wide plans must still meet accountability provisions of ESEA, including:
- annual review by district; potential identification for school improvement and appropriate corrective action; and accountability provisions required by ESSA, must also meet program-linked requirements relating to health, safety, civil rights, student and parental participation and involvement, services to private school children, and various programmatic fiscal

- requirements;
- Regardless of the level of school wide consolidation plan, schools must receive all the state and local funds it would otherwise *need to operate* in the absence of Federal funds.

Title II, Part A – Supporting Effective Instruction – “Class Size Reduction” (ESSA 2103 (3) (D) and Section 8101 (2) (21)

Teachers hired with Title II, Part A funds must be supplemental to those required by the State and must be certified for their teaching assignment. Title II, Part A funds may be used to reduce the overall class size of regular education classes where an inclusion/augmented model is used to serve students in *specialized programs*. Generally, class size reduction classes target K-3 grade levels. Reduced class size is a delivery model based on an evidence-based activity, strategy, or intervention, demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on 1) strong evidence from at least 1 week-designed and well-implemented experimental study, 2) moderate evidence format least 1 well-designed and well-implemented quasi-experimental study, 3) promising evidence from at least 1 well-designed and well-implemented correlational study with statistical controls for selection bias; or 4) demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and 5) includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

Questions to ask:

- Which prioritized student achievement need(s) does the class size reduction strategy address?
- If Title II, Part A funds have been used in the past to reduce class size, does documentation support the effectiveness of the strategy in addressing prioritized needs in previous years?
- Has the state class size requirements been met?
- Are the classes self-contained?
- Are the classes departmentalized?
- What delivery model is used for special programs, such as gifted, etc.?

Parent and Family Engagement Meetings

Each school served under Title I, Part A must convene an annual meeting, at a

convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation under this part and to explain the requirements of this part, and the right of the parents to be involved.

The school must offer a flexible number of meetings throughout the school year, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement.

[ESSA, Section 1116(c)(1) and (2)]

The purpose of the Title I annual parent meeting is to provide information to parents of participating children about the Title I program and their right to be involved in their child's education. *Food does not meet program objectives of any federal programs, and therefore, it is not allowable to purchase food from any federal funds. However, for FY20, cookies and coffee refreshments, in reasonable and necessary quantities, are allowed to be claimed from Title I funds, for Title I Parent and Family Engagement educational meetings. An agenda and sign-in sheets must be submitted along with the itemized refreshment receipt for reimbursement. Based on the adult attendance sheets, there is a \$2.00 per adult limit that can be claimed from Title I funds.*

Supplement Not Supplant (SNS)

Oklahoma State Department of Education abides by ESSA, Section 1118(b)(1)-(2) in terms of the federal funds to supplement, not supplant non-federal funds.

“(1)A State educational agency or local educational agency shall use Federal funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under this part, and not to supplant such funds.

(2)To demonstrate compliance with paragraph (1), a local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under this part ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving assistance under this part.”

Evidence-Based Programs

When using federal funds, school districts should be cognizant of the evidence based requirement under ESSA, Section 8101(21)

The term “evidence-based”, when used with respect to a State, local educational

agency, or school activity, means an activity, strategy, or intervention that—

(i) demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on—

(I) **strong evidence** from at least 1 well-designed and well-implemented experimental study;

(II) **moderate evidence** from at least 1 well-designed and well-implemented quasi-experimental study; or

(III) **promising evidence** from at least 1 well designed and well-implemented correlational study with statistical controls for selection bias; or

(ii)(I) demonstrates a rationale based on high quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and

(II) includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

To verify if a proposed expenditure is in alignment with the evidence-based ESSA requirement, the following websites may be checked:

“What Works Clearinghouse” at <https://ies.ed.gov/ncee/wwc/>

“Evidence for ESSA” at <https://www.evidenceforessa.org/>

“American Institute for Research” at <https://www.air.org/>

Consolidation of Funds in Schoolwide Programs

Consolidating Federal, State and local funds in a schoolwide program offers significant flexibility to a school to use all of its funds to meet the specific needs of its students identified through a needs assessment and included in the schoolwide plan.

A school implementing a schoolwide program may **consolidate funds** from Title I and other Federal education programs with State and local funds to use all of its funds to meet the specific needs of its students identified through a needs assessment and included in the schoolwide plan. *[ESSA, Section 1114(a)(1)(A)]*

The Secretary may, through publication of a notice in the Federal Register, exempt schoolwide programs under this section from statutory or regulatory provisions of *any* other noncompetitive formula grant program administered by the Secretary, or *any* discretionary grant program administered by the Secretary, to support

schoolwide programs, if the intent and purposes of such other programs are met. *[ESSA, Section 1114(a)(3)]*

Therefore, the Office of Federal Programs at the Oklahoma State Department of Education allows the following noncompetitive formula grant programs - as authorized by the Secretary in the Federal Register, Vol.69, No. 127, July 2, 2004 - to be consolidated in Project 785:

- Title I, Part A – Improving Basic Programs Operated by Local Educational Agencies
- Title I, Part C – Education of Migratory Children *[with the conditions imposed under 2CFR, 200.29(c)(1)]*
- Title I, Part D, Subpart 2 – Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent or At-Risk
- Title II, Part A – Preparing, Training, and Recruiting High Quality Teachers, Principals and Other Leaders
- Title III – Language Instruction for English Learners and Immigrant Students
- Title IV, Part A – Student Support and Academic Enrichment
- Title V, Part B, Subpart 2 – Rural and Low-Income Schools (RLIS)

A school that consolidates Federal funds in its schoolwide program is not required to meet most of the statutory and regulatory requirements of the specific Federal programs included in the consolidation. However, the school must ensure that it meets the intent and purposes of the Federal programs included in the consolidation so that the needs of the intended beneficiaries are met. *[ESSA, Section 1114(a)(3)(A); 34 CFR 200.29(a), (b), (d)]*

A schoolwide program school must “maintain records that demonstrate that the schoolwide program as a whole addresses the intent and purposes of each of the federal education programs whose funds were consolidated to support it.” *[ESSA, Section 1114(a)(3)(C)]*

A school operating a schoolwide program must identify in its schoolwide plan the programs that have been consolidated and address how it intends to meet the intent and purposes of those programs.”

Title IV, Part A Intent and Purpose

- Title IV, Part A – Student Support and Academic Enrichment is a federal grant whose purpose is to improve students’ academic achievement by increasing the capacity of State Educational Agencies (SEAs), Local Educational Agencies (LEAs), and local communities to:
 - provide all students with access to a well-rounded education;
 - improve school conditions for student learning; and
 - improve the use of technology in order to improve the academic achievement and digital literacy of all students.

The FY20 Title IV, Part A statutory authority only provides for formula grants. In

FY20 the Title IV, Part A application continues to be part of the Consolidated Application, and the funds are awarded on formula base by the Office of Federal Programs at the Oklahoma State Department of Education (OSDE).

Consortia

LEAs in a State may form a consortium with other surrounding local educational agencies and combine the funds each such agency in the consortium receives under this section to jointly carry out the local activities described in this subpart. Consortia may be formed among surrounding LEAs regardless of the allocation amount received by each LEA.

Allocations and LEA Responsibilities

The Title IV, Part A statutory authority requires SEAs to allocate a minimum of \$10,000 to its LEAs. Oklahoma State Department of Education allocates its LEAs a minimum of \$15,000.

LEAs with a Title IV, Part A allocation of \$30,000 or greater shall:

- Conduct a Comprehensive Needs Assessment (CNA) that includes, at a minimum, a focus on three content areas:
 1. Well-Rounded Educational Opportunities,
 2. Safe and Healthy Students;
 3. Effective Use of Technology
- Shall engage in consultation with stakeholders in the area served by the LEA during the design and development of the applications;
- Conduct the needs assessment at least once every three years;
- Expend:
 - At least 20 percent of funds for activities to support well-rounded educational opportunities;
 - At least 20 percent of funds for activities to support safe and healthy students; and
 - A portion of funds for activities to support effective use of technology.

LEAs with a Title IV, Part A allocation less than \$30,000:

- Shall not be required to conduct a CNA;
- Shall engage in consultation with stakeholders in the area served by the LEA during the design and development of the applications;
- Shall be required to engage in activities in only 1 (one) content area (Well-Rounded Educational Opportunities, Safe and Healthy Students or Effective Use of Technology);
- May choose to engage in activities in 2 or all 3 areas above;
- If activities in 2 or all 3 areas are provided, the LEAs will be limited to:

- At least 20 percent of funds for activities to support well-rounded educational opportunities;
- At least 20 percent of funds for activities to support safe and healthy students; and
- A portion of funds for activities to support effective use of technology.

All LEAs or consortium of LEAs:

- Shall submit an application to the SEA to receive their Title IV, Part A allocation;
- Are allowed to reserve not more than 2% for the direct administrative costs of carrying out the local educational agency's responsibilities under this subpart.
- A local educational agency, or consortium of such agencies, shall not use more than 15 percent of funds for purchasing technology infrastructure as described in subsection (a)(2)(B), which shall include technology infrastructure purchase for the activities under subsection (a)(4)(A). [ESSA, Section 4109(b)]
- The 15% infrastructure limitation rule is applicable to all LEAs, regardless of the allocation amount received. The following purchases are considered infrastructure:
 - Procuring devices, equipment, and software applications in order to address readiness shortfalls [ESSA, Section 4109(a)(2)(B)]
 - Technology infrastructure purchased to carry out blended learning projects under subsection 4109(a)(4)(A), which shall include: technology software and platforms; digital instructional resources, initial professional development activities, and one-time information technology purchases.

Transferability

- Title IV, Part A funds may be transferred to:
 - Title I, Part A
 - Title I, Part C
 - Title I, Part D
 - Title II, Part A
 - Title V, Part B

Meaningful and timely consultation must be provided to private school officials in accordance with ESSA, Section 8501 *before transferring out* any Title IV, Part A funds.

- Title II, Part A funds may be transferred into Title IV, Part A.

Title IV, Part A Q&A

Q1: If the LEA has transferred all funds out of Title IV, Part A, does the LEA still need to complete the consultation?

A1: Yes. All LEAs who receive Title IV, Part A funds still have to complete a consultation even if all funds have been transferred out of Title IV, Part A. The consultation date and members should be documented on the Title IV, Part A page of the Consolidated Application.

Q2: If an LEA chooses to transfer Title II, Part A funds into Title IV, Part A, and this increases the Title IV, Part A allocation at or over \$30,000, does the LEA need to do a Comprehensive Needs Assessment (CNA)?

A2: Yes. If transferring funds to Title IV, Part A increases the allocation to \$30,000 or more, then a CNA must be completed.

Q3: If an LEA chooses to transfer funds out of Title IV, Part A and this decreases the Title IV, Part A allocation to under \$30,000, does the LEA still need to complete the CNA?

A3: Yes. If the initial allocation is \$30,000 or greater, the CNA still needs to be completed.

Q4: If an LEA didn't spend Title IV, Part A funds for FY2018-2019, carried over those funds to FY2019-2020, received an allocation for FY2019-2020 and this increases the funds amount to \$30,000 or more, does the LEA need to complete a CNA?

A4: Yes. If Title IV, Part A funds reach \$30,000 or more, the LEA will need to complete a CNA.

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