

Rules and Regulations Meeting

Office of Federal and State Accountability

March 27, 2014

Welcome and Introductions

Roy Stehle, Director of Federal and State Accountability

Federal Updates

Roy Stehle, Director

Federal Updates

- ESEA Reauthorization – The “never ending story.”
- The ESEA Flexibility Waiver is our reauthorization. Steve will update us on all matters waiver.

Federal Updates

- For the foreseeable future, the ESEA Flexibility Waiver will be the “new” ESEA.
- The USED has moved in the direction of the waiver and it will be hard to pull back.

Federal Updates

- Funding for 2014-15 is up slightly – Preliminary is \$214,089,590 for Title I.
- Remember that the state has certain reservations – administration, Achievement, N&D.
- While funding is up slightly, allocations to districts may vary especially on current census data.

Federal Updates

- Community Eligibility Option Guidance
- New Homeless Guidance from USED
 - Title I funds may be used for Homeless Liaison.
 - Title I funds may be used for Homeless transportation.
- Omni-Circular combines OMB A-87 and OMB A-133 (plus others). USED will issue “new” EDGAR. Allowable costs remain much the same.

Federal Updates

- USED Carryover Waiver for SC has expired. If a district needs to carryover more than 15% into 2014-15, they will be able to reapply to SEA under the one waiver in every three year provision.
- The Dorchester 2 Waiver to the USED regarding the use of ACT tests instead of SC PASS was not approved by USED.

Federal Updates

- The SCDE has received a letter from USED outlining flexibility available in Title I schoolwide projects for Title I, IDEA, Title II, and non-federal funds.
- The SCDE has been receiving more “Dear Colleague” letters outlining policy that verges on guidance. The OFSA will begin to post those on the Title I website.

Federal Updates

- It is an active session of the General Assembly looking at legislation and provisos that impact federal programs.
- There is legislation related to Common Core, testing programs, and fairly prescriptive interventions that create supplement, not supplant issues for the uses of federal funds.

Questions



Contact

Roy Stehle

rstehle@ed.sc.gov

803-734-8118

ESEA Waiver Amendment

Steve Abbott, Team Leader

September 2013 Amendment

- Awaiting action from USED
- A response to follow-up questions was sent in January
 - Removes requirement for SES and Choice
 - Slight changes in weighting
 - Revised Partial Credit

Sample Elementary / Middle School Matrix

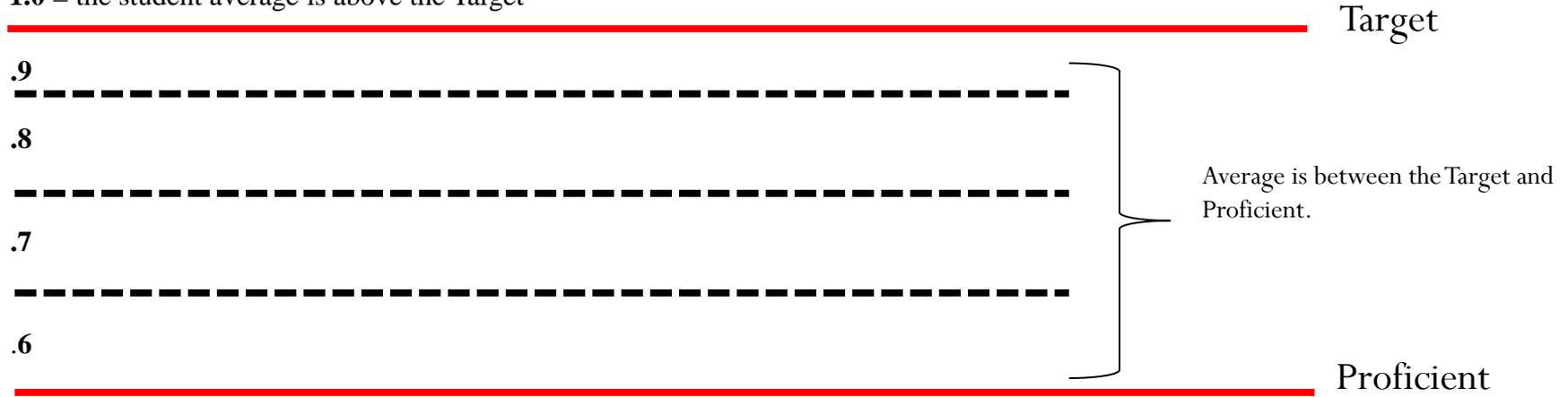
	English/LA Performance	Math Performance	Science Performance	Social Studies Performance	English/LA Percent Tested	Math Percent Tested
	Met/Improved	Met/Improved	Met/Improved	Met/Improved	95 % Tested	95 % Tested
All Students	1	0.8	1	1	1	1
Male	0.8	1	0.6	.4	1	1
Female	1	1	1	0.9	1	1
White	1	1	0	1	1	1
African-American	1	0.7	1	1	1	1
Asian/Pacific Is	I/S	I/S	I/S	I/S	I/S	I/S
Hispanic	.5	.5	.6	.4	1	1
Am Indian/Alaskan	I/S	I/S	I/S	I/S	I/S	I/S
Disabled	0.5	0.5	0.4	0.9	1	1
Limited Eng. Prof	1	1	1	1	1	1
Subsidized Meals	1	0.6	0.7	0.5	1	1
Total # of Points	7.8	7.1	6.3	7.1	8	9
Total # of Objectives	9	9	9	9	9	9
Percent of Above	86.6%	78.8%	70%	78.8%	100%	100.0%
Weight	40	40	5	5	5	5
Weighted Points Subtotal	34.64	31.52	3.5	3.94	5	5

Grade: 90 to 100 = A, 80 to 89.9 = B, 70 to 79.9 = C, 60 to 69.9 = D, < 60 = F
 Key: Met Target = 1 Below Target but Above Proficient = .6 to .9 Improved = .1 to .5
 Below Proficient & Not Improved = 0
 (Note: Percent Tested may only be Met Target=1 or Not Met=0)
 I/S – Fewer than 30 students in the group.

Weighted Score	83.6
Grade Conversion	B

Awarding Points in ESEA Grades

1.0 = the student average is above the Target



.5 = The average improved 5 points over the previous year's average.

.4 = The average improved 4 points over the previous year's average.

.3 = The average improved 3 points over the previous year's average.

.2 = The average improved 2 points over the previous year's average.

.1 = The average improved 1 point over the previous year's average.

0 = *The average is below proficient and showed no improvement over previous year's mean.*



ESEA Grades Point System for Schools and Districts

For any subject or student group:

- If the mean meets or exceeds the target annual measurable objective (AMO), the matrix reflects a 1.0 in that cell.
- If the mean is below the AMO, but at or above Proficient, a .6 through .9 would reflect which quartile between proficient and the AMO the mean falls.
- If the mean is below Proficient:
 - .1 through .5 reflects an increase in the mean from the previous year for that student group/subject.
 - .1 reflects one scale score point increase in the mean from the previous year up to .5.

ESEA Waiver Extension

- Sent on March 17, 2014
- Included freezing AMO's for 2013-2014
 - Grades 3 through 8 ELA And Math

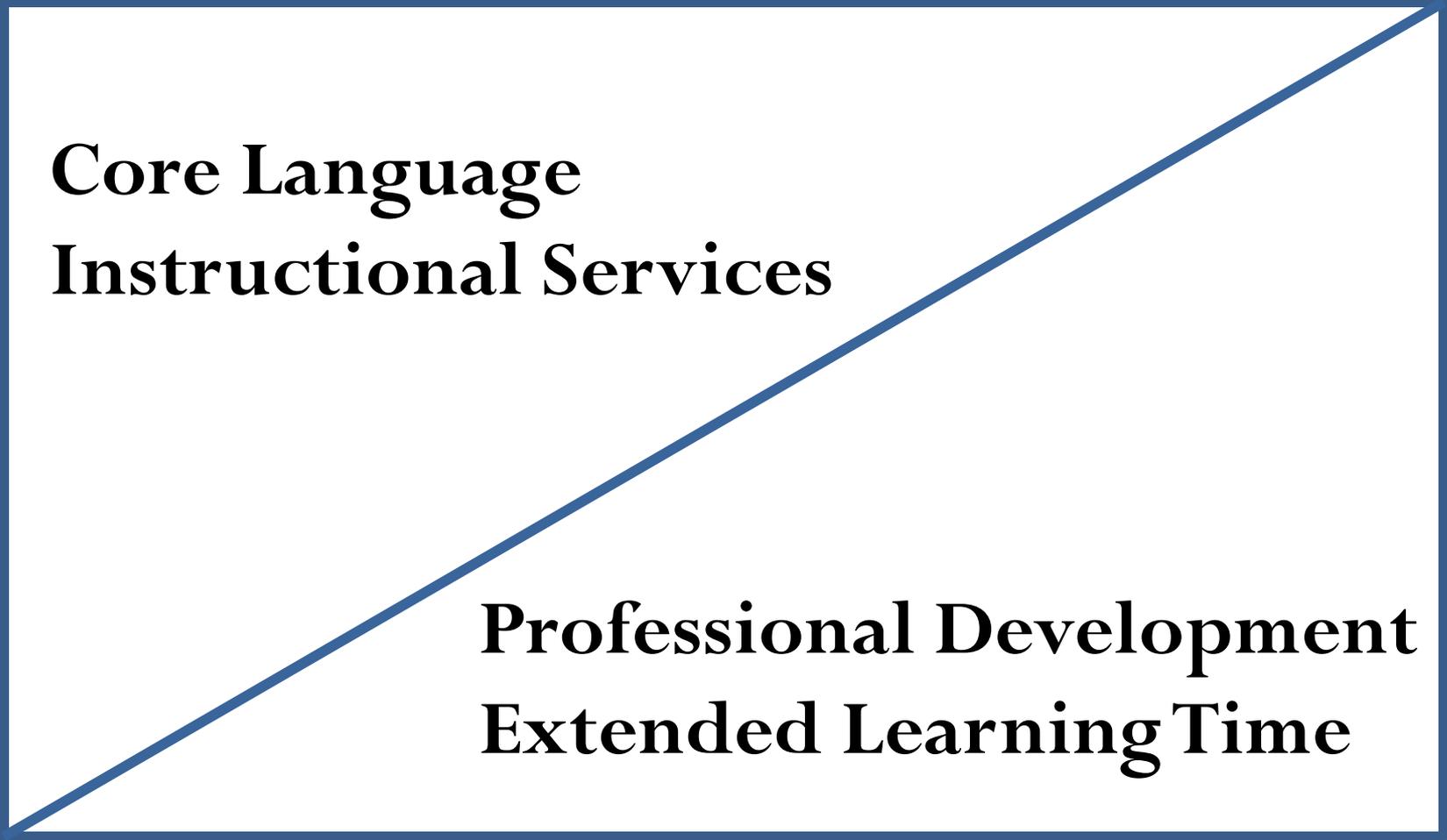
Choice

- Students currently enrolled in a school of choice may continue to attend until the terminal year at the school.
- Districts have the discretion to provide transportation next year.
- Parent notification regarding choice and transportation must be given before the end of the current school year.
- Choice data for the 2013-2014 school year must be entered into the Cayen Database prior to July 1, 2014.

Title III, Supplement, Not Supplant

Steve Abbott, Team Leader

ESOL and Title III



**Core Language
Instructional Services**

**Professional Development
Extended Learning Time**

Teacher to Student Ratios

- 1:60
- Office of Civil Rights
- Recommended
- Must meet that ratio in order to spend Title III funds outside of PD and ELT

McKinney-Vento

- Regional Training next week
- RFP will be posted soon
- RFP TA session tentatively scheduled for 4/30
- All districts will be monitored – 3 year cycle

McKinney-Vento

Region	Dates	Regional Coordinator	Location
Low Country	April 11, 2014 Date Change	Sonya Jones	Charleston County School District Coosaw Conference Room, 2nd Floor 75 Calhoun Street Charleston, SC 29401 Parking: Gaillard Auditorium Parking Garage off Alexander Street, attached to Charleston District Office Building. The fee for parking is \$2.00 per hour.
Midlands	April 7, 2014	Deborah Boone	Richland County School District One Teleconference Center 1310 Lyon St. Columbia, SC 29204
Pee Dee	April 9, 2014	Margaret Hutchins	Sumter School District Annex Professional Development Room 220 Hasell Street Sumter, SC 29150 Parking is available on either side of the building. Please enter on the Hasell Street side.
Upstate	April 3, 2014	Lisa Butler	West Market School of Education 1909 Dobbins Bridge Road Anderson, S.C. 29626

Neglected & Delinquent

- Basil Harris will be transitioning as the N&D contact
- Focus on transition and outcomes
- New requirement from Feds to track outcomes 90 days out – will schedule a brainstorming session to figure this out

Migrant Education

- Shift from sole focus on summer programs to serving students throughout the school year.
- Out of School Youth
- Early Childhood

Questions



Contact

Steve Abbott

sabbott@ed.sc.gov

803-734-0025

Time and Effort

Roy Stehle, Director

Time and Effort

- Personnel activity reports (PARS) or semi-annual certification?
- For employees paid from federal funds – in whole or part.
- An employee who works on multiple cost objectives must complete a monthly PAR.
- An employee who works on a single cost objective may complete a semi-annual certification.

Time and Effort

- Look at what an employee does, not how they are paid.
- Working on one federal program only and being paid from that program requires only a semi-annual certification.
- If you are the district Title I, Part A Coordinator and you only work on Title I, Part A – only a semi-annual certification is required even if you are split funded from Title I and general funds (a single cost objective).

Time and Effort

- Working on different federal programs or a federal program and non-federal program generally means different cost objectives and therefore a PAR is required.
- If you are the district Title I Coordinator and the district Elementary Coordinator then a PAR is required.

Time and Effort

- There is some clarity on a single cost objective for Title I and other federal and non-federal programs.
- Consolidated federal administrative funds may be considered a single cost objective. If all you do for the district is coordinate federal programs, then you may be able to do a semi-annual certification instead of a PAR – if you consolidate administrative funds.

Time and Effort

- Working solely in a Title I schoolwide program may be considered a single cost objective.
- Staff working solely in a Title I schoolwide program may only need to complete a semi-annual certification.
- Staff working in a Title I schoolwide program that consolidates federal, state, and local funds need not complete either a semi-annual certification or a PAR.

Time and Effort

- Time and effort reporting is important and is often a major federal audit finding.
- The new Omni-Circular promises some easing of time and effort rules (?).
- Always contact our office if there is any question regarding time and effort.

Questions



Schoolwide Projects

Roy Stehle, Director

Bobby Rykard, Team Leader

TWO TYPES OF TITLE I FUNDED SCHOOL PROGRAMS

- **Targeted Assistance**
 - Supplemental education services to eligible students with the greatest need.
- **Schoolwide**
 - Comprehensive program designed to upgrade the entire educational program in order to improve achievement of the lowest-achieving students in a school

SCHOOLWIDE PROGRAMS

A Schoolwide Program:

- Maximizes flexibility in using Federal funds.
- Serves as a vehicle for whole-school reform with focus on improving achievement of lowest-achieving students.
- Allows for easier leveraging of non-Federal and Federal funds to work together to improve educational performance of the entire school.
- Addresses student needs through a schoolwide plan based on a comprehensive needs assessment.

SCHOOLWIDE PROGRAMS

1. Comprehensive needs assessment of entire school

2. Comprehensive schoolwide plan

- a. Incorporates whole school reform strategies that--
 - i. Strengthen the core academic program
 - ii. Increase the amount of quality learning time to help provide enriched and accelerated curriculum
 - iii. Meet the needs of historically underserved students
 - iv. Provide services the meet the needs of low-achieving students
- b. Focuses on ensuring Highly Qualified Teachers in schools
- c. Incorporates high-quality ongoing professional development
- d. Identifies strategies to attract Highly Qualified Teachers

SCHOOLWIDE PROGRAMS

- e. Incorporates parent engagement strategies
- f. Assists pre-school children transition to elementary school
- g. Includes teachers in Data-Driven Decision-making
- h. Provides low-achieving students with effective, timely additional assistance
- i. Focuses on the coordination and integration of funds

3. Annual evaluation, with revisions as necessary

SCHOOLWIDE PROGRAMS

- Title I, Part A funds may be used for any activity that supports the needs of students, particularly the lowest achieving students, in the school that are identified through a comprehensive needs assessment and included in the schoolwide plan.

Will the proposed use of funds:

- Drive results for students who are failing or at risk for failing state achievement standards?
- Increase meaningful professional development?
- Accelerate reform?
- Foster continuous improvement and evaluate activities to modify or discontinue?

SCHOOLWIDE PROGRAMS

Key Requirements include:

- Supplement not supplant requirements are different for targeted assistance schools and schoolwides. Both must receive their fair share of local and state general funds. (MOE, Comparability, Staff Formulas, Base Student Cost)
- Necessary and reasonable to accomplish the purposes of Title I.
- Greater flexibility in the use of local, state, and federal dollars based on the Schoolwide plan.
- School based driven – School Renewal Plans – Funded activities need to be tied to the plan.

Questions



Carryover Management Strategies

Bobby Rykard, Team Leader

Carryover Strategies for the 2015 Title I Project

- Title I will not be a two year grant!!!
- Submit the Title I application as one comprehensive plan with carryover and current year
- However, Finance has a new Claims Reimbursement System
 - LEA will submit two budgets and expenditure claims in the new claims system
 - Carryover – Subfund 202
 - Current year – Subfund 201
 - Or alternate Subfunds
- District coordinators may request inquiry access
- System has business rules to prevent submission of amendments and expenditure claims exceeding budget
- Approval status for LEA and SCDE

[Home](#)

[Section A](#) ▾

[Section B](#) ▾

Budget: Abbeville County School District

Program Period: 2013

[Create Budget](#)

AllocationType	Allocation	Budgeted Amount	Total Unbudgeted Amount
Federal	\$600,000.25	\$501,126.00	\$98,874.25
State Equip	\$125,400.95	\$0.00	\$125,400.95
Local	\$238,178.32	\$0.00	\$238,178.32
State WBL	\$325,381.47	\$0.00	\$325,381.47

[Back](#)

[Budget Summary](#)

Budget Detail Page

Home

Section A ▾

Section B ▾

Budget Summary: Abbeville County School District

Program Period: 2013

Create New

Sub Program	Function Code	Sub Program Name	Source	(100) Salary	(200) Fringe Benefits	(300) Purchased Services	(400) Instructional Supplies	(500) Equipment	(600) Other	(700) Indirect Costs	Total
			Local	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
			State Equip	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
			State WBL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
01	100	Integration	Federal	\$100,358.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$100,358.00
02	200	WBL Activities (Work Based Learning)	Federal	\$0.00	\$400,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$400,000.00
03	100	Technology Training	Federal	\$567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$567.00
07	100	Program of Study	Federal	\$1.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1.00
08	200	Special Populations	Federal	\$0.00	\$0.00	\$200.00	\$0.00	\$0.00	\$0.00	\$0.00	\$200.00

Back

Example showing Approved Status

SOUTH CAROLINA
STATE DEPARTMENT
OF EDUCATION

Budget Details | Member Center | Contacts | Logout

Home Section A ▾ Section B ▾

Budget: Abbeville County School District

Program Period: 2013

Sub Program	Function Code	Object Code	Amount	Approval Status
02 - WBL Activities (Work Based Learning)	100 - Instruction	200 - Fringe Benefits	\$25,000.00	Submitted To SCDE CATE
02 - WBL Activities (Work Based Learning)	100 - Instruction	200 - Fringe Benefits	\$200,000.00	Approved

[Back](#)

Carryover Management Strategies

- Use carryover first to zero out carryover subfund so that only one budget exists in Claims System
 - **May need to amend carryover subfund in Claims System, but**
 - **No budget amendment necessary to Title I online application (as long as activities are included and approved)**
 - Amendments are still required for changes in overall budget or change in scope of activities
- Isolate carryover to a select few activities to monitor use of carryover
 - **District level activities (especially at the beginning of the year)**
 - Summer school
 - Professional development during the summer or stipends during
 - Salaries so carryover is consumed with minimal need for tracking and amendments
- Review budget reports from LEA Finance/claims system to assist LEA finance in shifting to consume carryover as needed

Questions



Contact

Bobby Rykard

brykard@ed.sc.gov

803-734-8110

SCATA Recognition

Terry Bennett, SCATA President-Elect

SCATA Scholarship Luncheon



Office of Federal and State Accountability— State Side

Darlene Prevatt, Team Leader

dprevatt@ed.sc.gov

803-734-3477

Contents

1. Accreditation
2. Regulations
3. Innovative Proposals
4. Diploma Program
5. District Strategic and School Renewal Planning
6. Cultural Exchange and Academic Study
7. Required Credentials for Professional Staff
8. Activity Coding System
9. Home Schooling
10. School Identification Numbers
11. Junior Scholars
12. ACT/SAT Improvement Program
13. Uniform Grading Policy, Dual Enrollment, and Graduation Requirements
14. High School Courses and Requirements
15. Waiver Requests and Synopses
16. Flexibility Through Deregulation
17. Flexibility for Schools and Districts
18. Proficiency Credit Systems
19. Monitoring

Flexibility

- Innovative Proposals
 - 43-234 – Permits innovative educational approaches
 - Locally designed subject area course proposals for core credit courses require SBE approval

Flexibility

- **The Flexibility Proviso in 2013-14 Appropriations Bill 3710, Proviso 1.32 and 1A.17**, allows some flexibility in the area of administrative and professional personnel qualifications, duties, and workloads at the district and school levels.

Flexibility

- Based on the SBE Regulation 43-234, schools can apply for approval to the SCDE for **proficiency-based systems**. See link below for the **proficiency-based systems** application and directions to be submitted to the Office of Federal and State Accountability for SCDE approval.

<http://ed.sc.gov/agency/programs-services/126/>

Flexibility

- According to SBE Regulation 43-261, “Upon request of a district board of trustees or its designee, the State Board of Education may **waive** any regulation that would impede the implementation of an approved district strategic plan or school renewal plan.”

Questions



Contact

Darlene Prevatt

dprevatt@ed.sc.gov

803-734-3477

Priority, Focus and Support Schools

Roy Stehle, Director

Bobby Rykard, Team Leader

Priority and Focus School Updates

- Priority Exit Criteria
 - School no longer falls within the lowest 5% of Title I schools using the composite index for two consecutive years
 - Possible ERT visits
- Focus Exit Criteria
 - School no longer falls within the 10% of Title I schools with the highest overall average achievement gaps

Title I Support Schools Updates

- 2013 Title I Support projects (13BM***) end 6/30/14
- 2014 Title I Support allocations are complete (Project 14BM***)
 - Available through 6/30/15
- Title I Schools with “D” or “F” grade not identified as Priority or Focus School (newly identified schools received funding)
- Input activities in the schoolwide plan by choosing “New TI Support 1003(a)” activity
- Approvable activities
 - Supplemental
 - Title I allowable
 - Targeted to areas not meeting AMOs by subject/subgroup on ESEA matrix

Questions



Desk Audits and Monitoring Updates

David Boison, Education Associate

Bobby Rykard, Team Leader

Comparability

- Desk review every other year
 - Abbeville – Hampton 1
 - Hampton 2 – York 4
 - (including state agencies)
- Send documentation electronically to David Boison
 - dboison@ed.sc.gov
 - (803) 734-0594

Budget Desk Review Procedures - *Draft*

- Budget Report by Account from LEA's accounting software (District Level)
- Labor History for Employees paid from Title I funds (District Level)
- Detail Account Inquiry by Account Number (District Level)
- Budget Report by Account (School Level)
- Labor History for Employees paid from Title I funds (School Level)
- Detail Account Inquiry by Account Number (School Level)
- Contact: Karen Cook, Education Associate

803-734-4040

kcook@ed.sc.gov

Equipment and Inventory

Desk Review Procedures - *Draft*

- Title I inventory reconciliation form (tracks disposals, location of Title I purchased equipment, item description, model number, inventory control number, serial number, acquisition date, cost, condition, etc.)
- Current expenditure report for Title I purchased equipment
- Check-out form if LEA has mobile equipment
- The Office of Federal and State Accountability's Title I page on the SCDE's website contains copies of the Inventory Reconciliation Form and the Equipment Check-out Form.
- Contact: Karen Cook, Education Associate
803-734-4040 kcook@ed.sc.gov

Risk-Based Monitoring

- Districts are subject to additional monitoring based on:
 - Previous audit findings
 - Federal, state, independent or other
 - Size of district, allocation, number of Title I schools served
 - School performance, number of Priority, Focus, Title I Support Schools
 - District or public concern
 - New coordinators for monitoring and additional technical assistance

Questions



Contact

David Boison

dboison@ed.sc.gov

803-734-0594

Title I Tidbits

Roy Stehle, Director

Proviso 1.84

Summer Reading Camps

- *The reading camps must provide an educational program offered in the summer by each local school district for students who are substantially not demonstrating reading proficiency at the end of third grade.*
 - Funds allocated by # “Not Met 1” on 2014 PASS
 - Title I cannot be used to meet state mandate
 - Title I can be used to serve additional students above “Not Met 1” in Title I Schools
 - Title I funds may not be used for students that are ineligible for Title I services (non-Title I schools)

Questions



Community Eligibility Provision

Bobby Rykard, Team Leader

Community Eligibility Provision (CEP)

- Purpose is to provide free meals to all students in an eligible school and to relieve parents of having to complete Free/Reduced Lunch Applications
- Schools with 40% poverty are eligible for CEP and use direct certification data (SNAP, TANF, etc.) instead of traditional Free/Reduced Lunch Applications
 - CEP eligibility is valid for up to four years
 - May update direct certification data annually
- For CEP Schools, the poverty count determined by direct certification data is multiplied by 1.6 to determine USDA reimbursement amount for free meals
 - Districts will be responsible for paying for remaining meals not covered by federal reimbursement

CEP Impact for Title I School Eligibility and Poverty Ranking

- 2015 Projects use March free/reduced lunch counts for school ranking
- Gauge direct certification data compared to free/reduced data
 - Are schools eligible for Title I?
 - Change in number of schools 75% and above?
 - What happens to rank order (PPA)?
- Districts with one school per-grade span or less than 1,000 students
 - No real change to serving schools since not required to rank schools
 - As long as schools are still eligible
- 2016 Title I application may use direct certification data instead of free/reduced lunch data

Questions



Questions and Answers Session

