

# **New Coordinator's Training - Day Two**

**Office of Federal and State Accountability  
Consolidated Finance and Applications Team**

**Ellen Weaver  
State Superintendent of Education**

# Table Talk- How are you feeling coming into Day Two?



# AGENDA

**Maintenance of Effort/Comparability-** Greg King

Finance Facts

McKinney-Vento Homeless

Title II- Supporting Effective Instruction

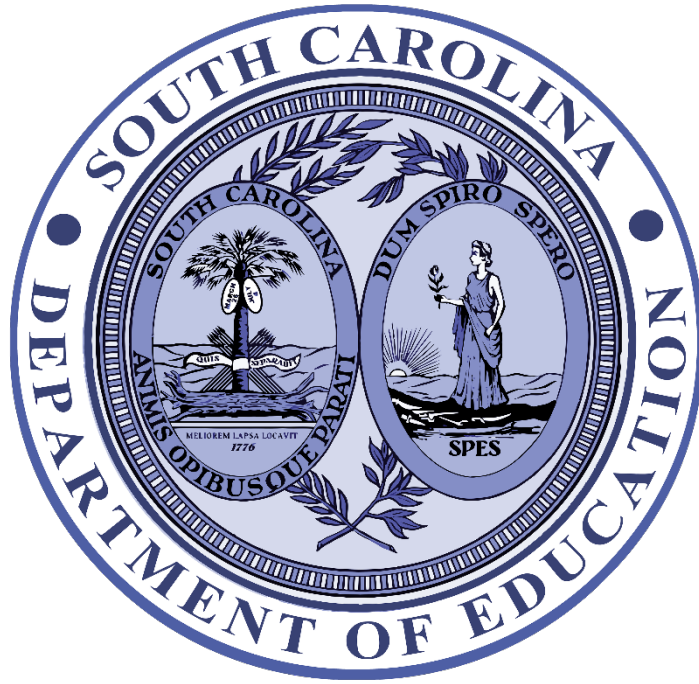
Lunch

Title IV, Part A – Student Support and Academic Enrichment

Title V- REAP

Table Talk

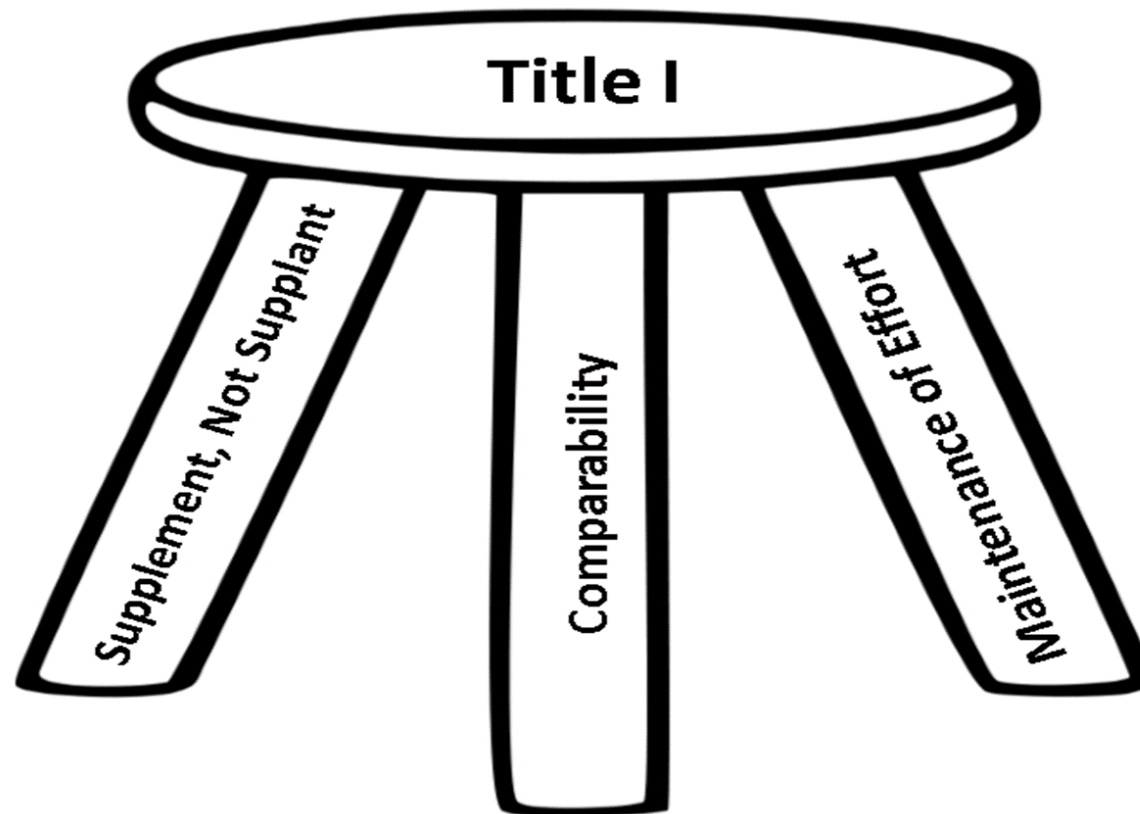




# Maintenance of Effort

Greg King  
Consolidated Monitoring and Oversight

# 3 Leg Stool



# What is MOE?

- Maintenance of Effort (MOE) is a federal requirement that requires grant recipients and/or sub-recipients to maintain a certain level of state/local fiscal effort to be eligible for full participation in federal grant funding.



# In Other Words

- MOE is a test of equity.
- MOE requires LEAs to demonstrate that the level of state and local funding remains relatively **constant** from year to year.
- An LEA may receive Title I funds only if the LEA has maintained its fiscal effort.



# Purpose

- Title I is *in addition (supplemental)* to the minimum education that all students receive.
- To ensure the sub-recipient of federal funds does not spend those funds in place of state and local dollars (supplanting).
- To ensure the sub-recipient spends their state and local funds for the same activities that would be provided if federal dollars were not available.





# “Meeting” MOE

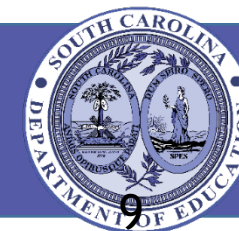
- MOE is based on the two previous years
- Districts meet MOE for 2021-2022 if:
  - 2020 state/local effort is at least 90% of 2019
  - For example:

MOE for 2019: \$7,305.50

MOE for 2020: \$7,246.03 (-59.47)

90% of \$7,305.50 = \$6,574.95

\$7,246.03 > \$6,574.95 so MOE has been met



Step 1:

Preceding Year Audit Report Total Expenditures:

(Refer to the audited Location Reconciliation Schedule)

\$ 15,200,000

Step 2:

Items Subtracted From Total Expenditures in Step 1:

(List page number for each data source from Audit Report.)

Federal Expenditures (SEFA) Page

\$595,000

Capital Outlay (Attach Report)

170,000.00

Debt Service Page

73,500.00

Community Services Page

1,600.00

Pupil Activity Fund Page

45,000.00

Intergovernmental Page

9,800.00

Total Amount Excluded:

\$ (894,900.00)

Total Expenditures for MOE Calculation:

\$ 14,305,100.00

Step 3:

135 ADM:

2,105

The per pupil MOE calculated for the preceding year

from Audit Year 2020:

\$ 6,795.77

Step 4:

The per pupil MOE calculated for the second preceding year

from Audit Year 2019: (Attach Worksheet)

\$ 6,576.98

Met MOE Requirements? \*

Met MOE

\*Compare the per pupil MOE in step 3 to the per pupil MOE of step 4. The per pupil amount in step 3 must be not less than ninety percent of the per pupil amount in step 4 to meet the MOE requirement.

# MOE in GEMS

GEMS Home

Administer

Search

Reports

Inbox

Funding

Grant Summary

LEA Document Library

Address Book

SCDE Resources

Help for Current Page

Request Help

GEMS Sign Out

Stanley, Jewell

Production

Session Timeout  
00:59:53

Maintenance of Effort

2001 - I y School District (2001) Public District - FY 2019 - Title I Part A - Rev 0 - Title I Part A

Go To

Step 1:	Audit Source Page #	Amount
Preceding Year Audit Report Total Expenditures: (Refer to the audited Location Reconciliation Schedule)	* 67	* \$ 50,111,437.00
Step 2: Items Subtracted From Total Expenditures in Step 1:	Audit Source Page #	Amount
Federal Expenditures (SEFA) (Upload page to Related Documents)	* 72	* \$ 5,457,651.00
Capital Outlay (Upload report to Related Documents page)	NA	* \$ 3,222,812.00
Debt Service (Upload page to Related Documents)	* 63	* \$ 1,237,711.00
Community Services (Upload page to Related Documents)	* 13	* \$ 114,661.00
Pupil Activity Fund (Upload page to Related Documents)	* 65	* \$ 473,263.00
Intergovernmental (Upload page to Related Documents)	* 13	* \$ 626,397.00
Total Amount Excluded:		\$ 11,132,495.00
Total Expenditures for MOE Calculation:		\$ 38,978,942.00
Step 3:	Audit Year	Amount
135 ADM:(Upload to Related Documents)		* \$ 2,511.00
The per pupil MOE calculated for the preceding year from Audit Year	* 2016-2	\$ 15,523.27
Step 4:	Audit Year	Amount
The per pupil MOE calculated for the second preceding year from Audit Year	* 2015-2	\$ 14,645.94
Met MOE Requirements? +		Met MOE
+ Compare the per pupil MOE in step 3 to the per pupil MOE of step 4. The per pupil amount in step 3 must be not less than ninety percent of the per pupil amount in step 4 to meet the MOE requirement.		

# ESSER & CARES Act



**Pay  
Close  
Attention**



# Implications

- The USED is not waiving this requirement.
- ESSER and CARES Act funding can make it difficult to meet your MOE
- How?
  - Schedule of Federal Expenditures (SEFA)
- Smaller districts will have a harder time than larger districts.



Maintenance of Effort

200[REDACTED] School District (2001) Public District - FY 2019 - Title I Part A - Rev 0 - Title I Part A

Go To

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+ Compare the per pupil MOE in step 3 to the per pupil MOE of step 4. The per pupil amount in step 3 must be not less than ninety percent of the per pupil amount in step 4 to meet the MOE requirement.		

# How to Meet MOE

- Collaborate
  - Collective effort with finance director and superintendent.
- Plan, plan, and plan some more
  - Use the funding for capital projects...why?
    - Capital projects are excluded from MOE calculation.
  - Create mock reports to project impact.
  - Begin at the beginning of the school year or earlier.

**Make it a priority for everyone**





# Just To Be Clear

- The USED is not waiving this requirement.
- [School District Memoranda](#) dated June 21, 2022.
- Memorandum dated June 21, 2022 from Dr. Sarah Longshore to Chief Financial Officers and Federal Program Directors.
- “ED normally sets a high bar for determining when a circumstance is truly “exceptional” or “uncontrollable,” so **not all districts who apply for a waiver will receive one**. The district must be able to demonstrate that **its situation is unique from other districts** and provide applicable documentation and data demonstrating the need for the waiver.”
- The SCDE cannot grant penalty-free waivers.
- The SCDE will assist with the process as needed or requested.



# Not Meeting MOE



# Waivers



# Waiver Requests

The State has no authority to waive the MOE requirement. The U.S. Dept. of Education may waive the requirement for the following:

- Exceptional or uncontrollable circumstances, such as natural disaster.
- A precipitous and unforeseen decline in the financial resources of the State.
- Waivers may now include “a change in the organizational structure of the LEA.” 20 USC 7901 (c)



# Recommended Procedures

- Apply for the standard waiver first.
- If denied, then use the ESSA once every five-year waiver.
- Develop a plan right now for meeting MOE for 2023 and beyond.
- Review at least quarterly to ensure that MOE will be met.



# Penalties



# Penalties

The penalties for not meeting Maintenance of Effort remain the same.

**An LEA may receive a reduction in all federal program funding if it fails to meet the requirement and a waiver is not granted.**



# Penalties, Cont'd

Don't tempt fate.

Plan ahead.

We are here to help you...let us.





# Tips and Friendly Advice



# Tips and Friendly Advice

## Don't Reinvent the Wheel

Use and fully complete the form from the SCDE website...it works! Do not use “custom” forms.

- <https://ed.sc.gov/policy/federal-education-programs/title-i/maintenance-of-effort-moe/>



# Tips and Friendly Advice, Cont'd

Keep everything **consistent** from year to year.

Beware of large anomalous capital outlays.

Work closely with your Finance Director.

Review quarterly.

Ask Questions.



# Questions



# Comparability Defined

- What is comparability?
  - ❖ A test of **Fairness** in funding
- Why do we calculate comparability?
  - ❖ **It is required** every year the LEA receives Title I funding
  - ❖ ESSA, Section 1120A(c)



# Comparability Exceptions

One school per grade span

One large school and one small school



# Comparability Due Dates

- Complete by NOVEMBER 15
- Comparable by JANUARY 15



# Comparability Timeline

- **January - April**
  - Proactively engage in district level budget (state and local funds) discussions concerning staff assignments, equipment, and material for the purpose of ensuring compliance with Title IA comparability requirements.
- **May - July**
  - Conduct an introductory meeting with Human Resources and LEA Finance representative to discuss the requirements for the completion of the upcoming Comparability Report.
  - Establish participant roles and responsibilities.
  - Establish LEA specific timelines for completion of the report.





# Comparability Timeline - Continued

## August

Obtain copy of preliminary district-wide school staffing report from Human Resources.

Compare list of Title IA funded staff as reflected on the School Allocation page to the Title IA funded staff as reported by Human Resources.

## September

It is a recommendation and best practice to gather the data needed to complete calculations (student and staff assignments data) and run a preliminary report.

Run comparability using the Comparability Worksheet found on the SCDE website.

Make comparability corrections immediately for all schools that are shown to be non-comparable.



# Comparability Timeline - Continued

## October

An LEA should collect the necessary data to demonstrate comparability as of the October full time equivalent (FTE) count day.

## November

Title IA Comparability Report is submitted annually to the Consolidated Oversight and Monitoring Team.

## December - January

If all schools in an LEA are not comparable as of the October FTE count day, the LEA will file a revised comparability report with SCDE demonstrating that, as of a date determined by SCDE, comparability has been met.



# Federal Criteria

Tests (8)

SCDE picks the test

In SC the test = **student:teacher**

District-wide salary schedule

District policy to ensure equivalence of staff

District policy to ensure equivalence in materials and supplies



# Eligible Employees for Counting Purposes

- **Instructional Staff Members to Be Included**
- When an LEA measures compliance by comparing student/staff ratios, the LEA should **consistently** include the same categories of staff members in the ratios for both Title IA and non-Title IA schools. Instructional staff may include teachers and other personnel assigned to schools who provide direct instructional services, including music, art, and physical education teachers; guidance counselors; speech therapists; and media specialists as well as other personnel who provide services that support instruction, such as school social workers and psychologists.
- In calculating comparability, an LEA should only include staff paid with State and local funds. This would exclude staff paid with private or federal funds. Other staff that would be excluded are principals, assistant principals, custodians, cafeteria personnel, school nurses, security personnel, pre-kindergarten teachers, pre-kindergarten paraprofessionals, secretaries, and non- instructional paraprofessionals.
- The activities authorized by ESEA include activities that are authorized by Title VII of ESEA, the Impact Aid Program. Because Impact Aid is considered general aid to recipient LEAs, Impact Aid funds may be used for any educational activity consistent with local and State requirements. As such, Impact Aid funds are effectively deemed State and local funds for which no accountability to the federal government is required, and staff that is paid with Impact Aid funds is included in comparability determination.



# Not Comparable?

- If student:teacher ratio does not work:
  - Adjust funding source
  - Use another method (contact SCDE first)
  - Move people



# Comparability Procedure

- Must count students and teachers ON SAME DAY!
- Compare Title I schools by grade spans served.

Compare non-Title I to Title I schools, *or*  
if all Title I schools, compare schools with the highest  
poverty rates to those with the lowest poverty rates.



# Comparability Procedure- Continued

- Count students using district's Membership Count.
- Count allowed staff using best possible system (ex. personnel or finance).
- Do not count 3- or 4-year-olds.



# Comparability Procedure- Continued

- Source data must be **verifiable** by an auditor.
- Social security numbers and salaries are **not** needed.
- A K-8 school can be counted as one K-5 and one 6-8 school.





# Comparability Calculation Example

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
* Title I Elementary Schools					
Beaufort Elementary	KG - 5	528	70.2	7.5	Yes
Broad River Elementary	KG - 5	510	49.4	10.3	Yes
Davis Elementary	KG - 5	417	38.7	10.8	Yes
Shanklin Elementary	KG - 5	726	59	12.3	Yes
Port Royal Elementary	KG - 5	189	16	11.8	Yes
St. Helena Elementary	KG - 5	808	56	14.4	No
Shell Point Elementary	KG - 5	673	60	11.2	Yes
Non-Title I Elementary Schools					
Hilton Head	KG - 5	1,764	114.5	15.4	
Lady's Island	KG - 5	757	70.0	10.8	
MC Riley	KG - 5	1,005	88.0	11.4	
Mossy Oaks	KG - 5	484	42.0	11.5	
Total		4,010	314.5	12.8	
110% of Student/FTE ratio for non-Title I schools *				14.08	

# Exemptions or Exceptions

- Contact us to review any and all exemptions or exceptions.
- **These may include:**
  - One off or unique schools (i.e. Montessori)
  - A K-2, 3-5 or similar school may be excluded if only one in district
  - Wild swings in enrollment

Exemptions and/or exceptions will be reviewed annually.

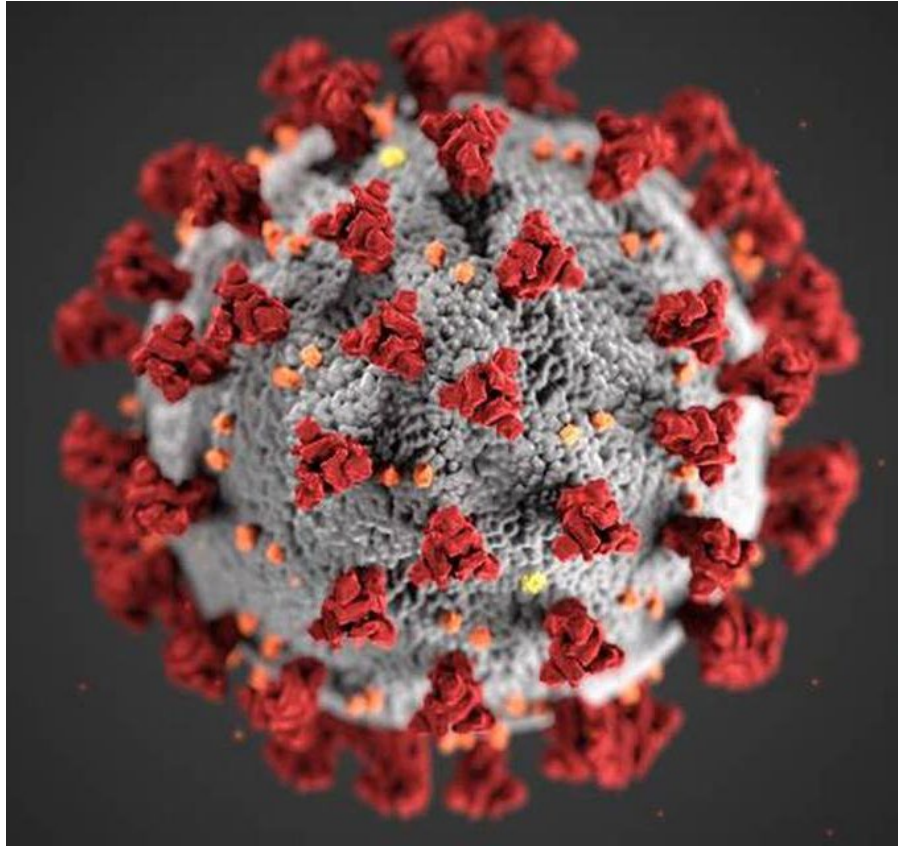
Plan ahead in the event that this is not approved in subsequent years.



# Common Issues

- Counting the wrong people.
- Source documentation not provided.





# Covid -19

# Common Issues- Continued

- The pandemic has thrown comparability into a tailspin for many districts.
- No waivers for comparability - must be met.
- There are options!
- Unique situations require 1-on-1 meetings via telephone or Teams.
- Contact SCDE if your district is not able to meet comparability in **October**.
- Contract Teachers (non FTEs)



# Questions

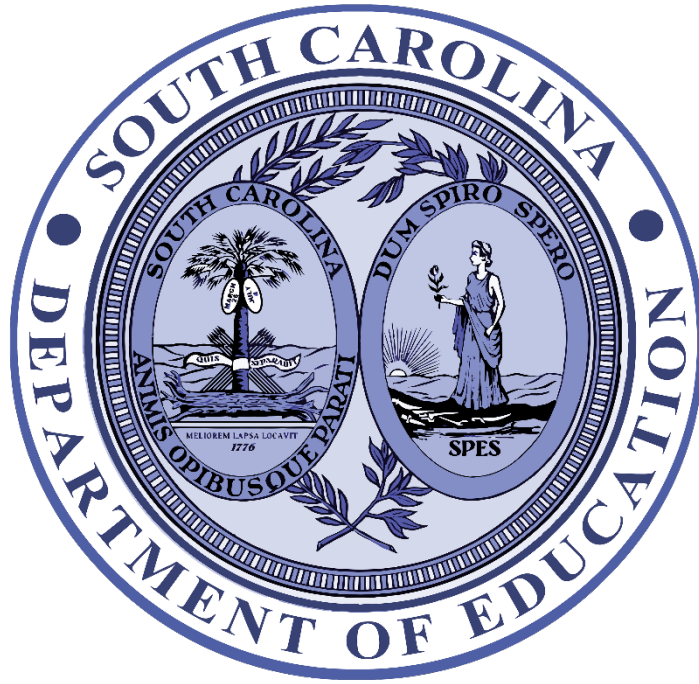


# Contact Information

Gregory King  
Education Associate  
803.734.0025  
[gking@ed.sc.gov](mailto:gking@ed.sc.gov)

Barret Leviner  
Team Leader  
803.734.3477  
[bleviner@ed.sc.gov](mailto:bleviner@ed.sc.gov)





# Finance Facts

Jennifer Rhodes, Sharay Mosley,  
and Sarah Wagers  
Office of Federal and State Accountability



# Aligning Funding Sources to Meet Needs - Same Targeted Goal

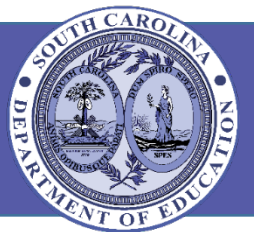
- Foundational Concept - Comprehensive Needs Assessment - Data Review, Collection and Root Cause Analysis
- Logic Models - Inputs, Activities, Benchmarks, Short-Term Outcomes, Long-Term Outcomes
- Collaboration across multiple federal programs
- Coordination of resources to meet aligned needs of students, teachers, and parents served by programs - understanding program purposes and allowability



# Resources

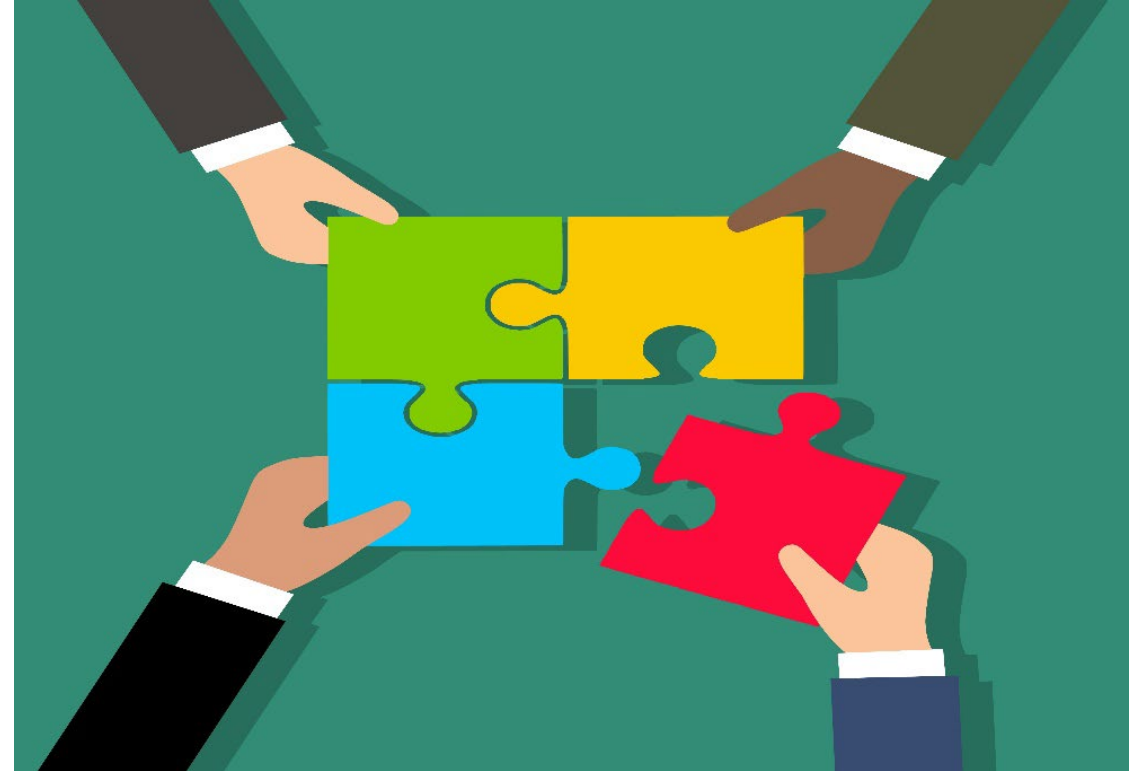
[Program Funding](#)

[Allowable Use of Funds](#)



# “Fund your plan, rather than plan your funds.”

- Math Supports
- Reading Interventions
- PBIS
- Community Engagement



# Escalation Model

Step 1	Step 2	Step 3	Step 4	Step 5	Step 6
Thirty days prior to submission deadline:	Two weeks before submission deadline:	One week after submission deadline or extension deadline:	Two weeks after submission deadline or extension deadline:	One week after 1st level of escalation:	Two weeks after 1st level of escalation:
Team Lead provides deadline reminder to Federal Programs Point of Contact in District.	Program Manager contacts District Program Coordinator to determine if assistance is needed.	Program Manager contacts District Program Coordinator to determine if an extension or assistance is needed.	1st Level - Escalate to Team Leader to make contact with the District Program Coordinator or District Program Coordinator's next level.	Director apprises Deputy Superintendent. The district's risk assessment rating is negatively affected for failure to adhere to timely submission of federal program application.	2nd Level - Deputy Superintendent or State Superintendent contacts District Superintendent.

# Claiming Expectations Year 1

Grant	Claiming Percentage Expectation/ Target Y1/Q1 (July 1 - Sept 30)	Claiming Percentage Expectation/ Target Y1/Q2 (Oct 1 - Dec 31)	Claiming Percentage Expectation/ Target Y1/Q3 (Jan 1- March 31)	Claiming Percentage Expectation/ Target Y1/Q4 (April 1 - June 30)
Deadline	Deadline for Claiming - November 15	Deadline for Claiming - February 15	Deadline for Claiming - May 15	Fiscal Year End Deadline for Claiming - August 15
Title I	-	40%	60%	85%
Title II	-	15%	30%	50%
Title IV	-	15%	30%	50%
Title V	-	-	35%	50%

# Claiming Expectations Year 2

Grant	Claiming Percentage Expectation/ Target Y2/Q1 (July 1 - Sept 30)	Claiming Percentage Expectation/ Target Y2/Q2 (Oct 1 - Dec 31)	Claiming Percentage Expectation/ Target Y2/Q3 (Jan 1- March 31)	Claiming Percentage Expectation/ Target Y2/Q4 (April 1 - June 30)
Deadline	Deadline for Claiming - November 15	Deadline for Claiming - February 15	Deadline for Claiming - May 15	Fiscal Year End Deadline for Claiming - August 15; Grant Closing Deadline for Claiming - December 30
Title I	85%	90%	95%	100%
Title II	60%	75%	90%	100%
Title IV	60%	75%	90%	100%
Title V	60%	75%	90%	100%

# Claiming Expectation Emails

- OFSA will track claims quarterly.
- Districts that have not met their quarterly claiming criteria will receive an email from OFSA stating:
  - The district has not submitted claims for this quarter,
  - The district has claimed less than [\_\_]% of the total subgrant award, or
  - The district has met the claiming expectation for this quarter.
- Patterns are tracked to ensure funding is expended.
- Districts will receive these emails from Sharay Mosley.



# Claiming Deadline Reminder

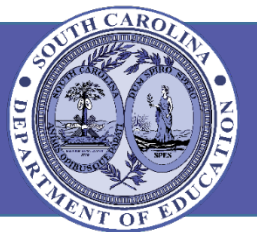
- It is imperative that districts submit quarterly claims. Submitting timely claims is not only a good fiscal practice but can save from problems at the end of a grant. Claims will be tracked on a quarterly basis.
- The GAPS system shuts down automatically on Aug 15. OFSA has no power over this automatic shut down.

Reporting Period	Deadline for submitting claims
July 1 - Sept 30	November 15
Oct - Dec 31	February 15
Jan 1 - March 31	May 15
April 1 - June 30	August 15





# GRANT AWARD NOTIFICATION REMINDERS



# Updates/Important Areas in a GAN

D. Reimbursements will be based upon receipt of expenditure reports that will be accepted monthly but must be *received at least quarterly through the grants accounting processing system (GAPS). Goods and/or services received by the end of each quarter should be invoiced, paid, and claimed within 45 days after the close of the quarter.* Goods and/or services must be received within the quarter to be claimed for that quarter.

E. In accordance with generally accepted accounting principles (GAAP), all expenditure reports for funds spent by the end of the fiscal year, June 30, each year, are due to the SCDE by August 15, that year. Goods and/or services received by June 30, each year, must be invoiced, paid, and claimed by August 15, each year. No exceptions.

F. All funds must be fully obligated by the project end date of September 30, 2024. ***The final expenditure report is due to the SCDE by December 30, 2024.*** All goods and/or services must be received, paid, and claimed by December 30, 2024. No exceptions.



# Unique Entity Identifier

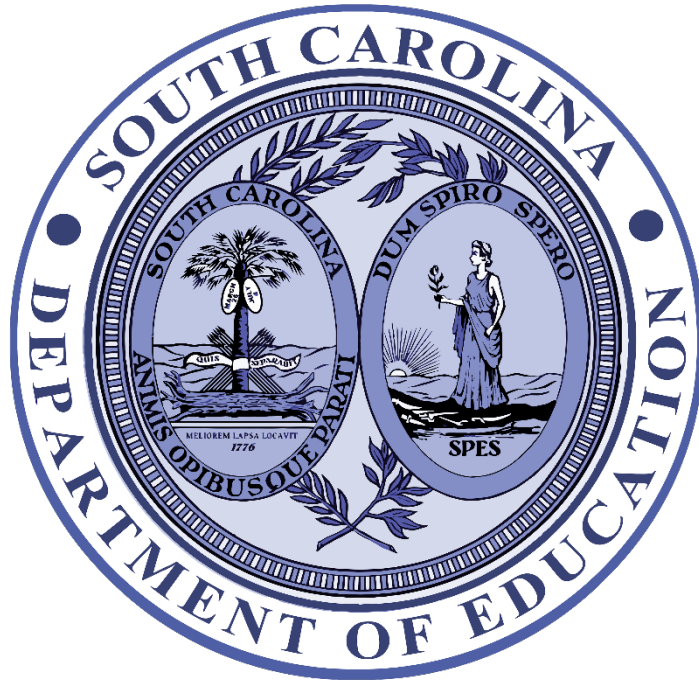
- The Office of Management and Budget (OMB) directed federal agencies to complete their transition to the UEI no later than April 4, 2022.
- GANS will no longer have a DUNS number listed; they will now have a Unique Entity Identifier (UEI).
  - 4. Subgrantee Unique Identifier (UEI#):  
0093882488  
Subgrant Code: 0160
- These UEIs will be automatically provided if the SAM.gov registration is up-to-date.
- If the district's registration is not up-to-date, must re-up SAM.gov registration to continue as a subgrantee.



# Indirect Cost

- Amended GANS will *not* be issued to adjust the indirect cost rate in the second year of the grant.
- New language on GAN:  
*The negotiated indirect cost rate or the indirect cost allocation plan approved for the subgrantee applies to this subaward.*
- In the second year of a grant districts will be required to amend the Grants Electronic Management System (GEMS) and the Grants Accounting Processing System (GAPS) to reflect budgeting for the updated indirect cost rate.





# Title I, Part A Homeless Set-Aside McKinney-Vento Program

Birley Wright and Kim Humphrey  
Office of Federal and State Accountability

# McKinney-Vento Objectives

- Understand how to use the LEA McKinney-Vento data to help determine the Title I, Part A homeless set aside for the LEA
- Review guidance from US ED regarding per pupil amount for set aside
- Discover new ideas for how to spend your homeless set aside to best meet the needs of your student's experiencing homelessness.





# Show Us the Money!

How are you spending your Set-Aside?

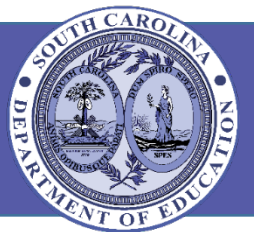
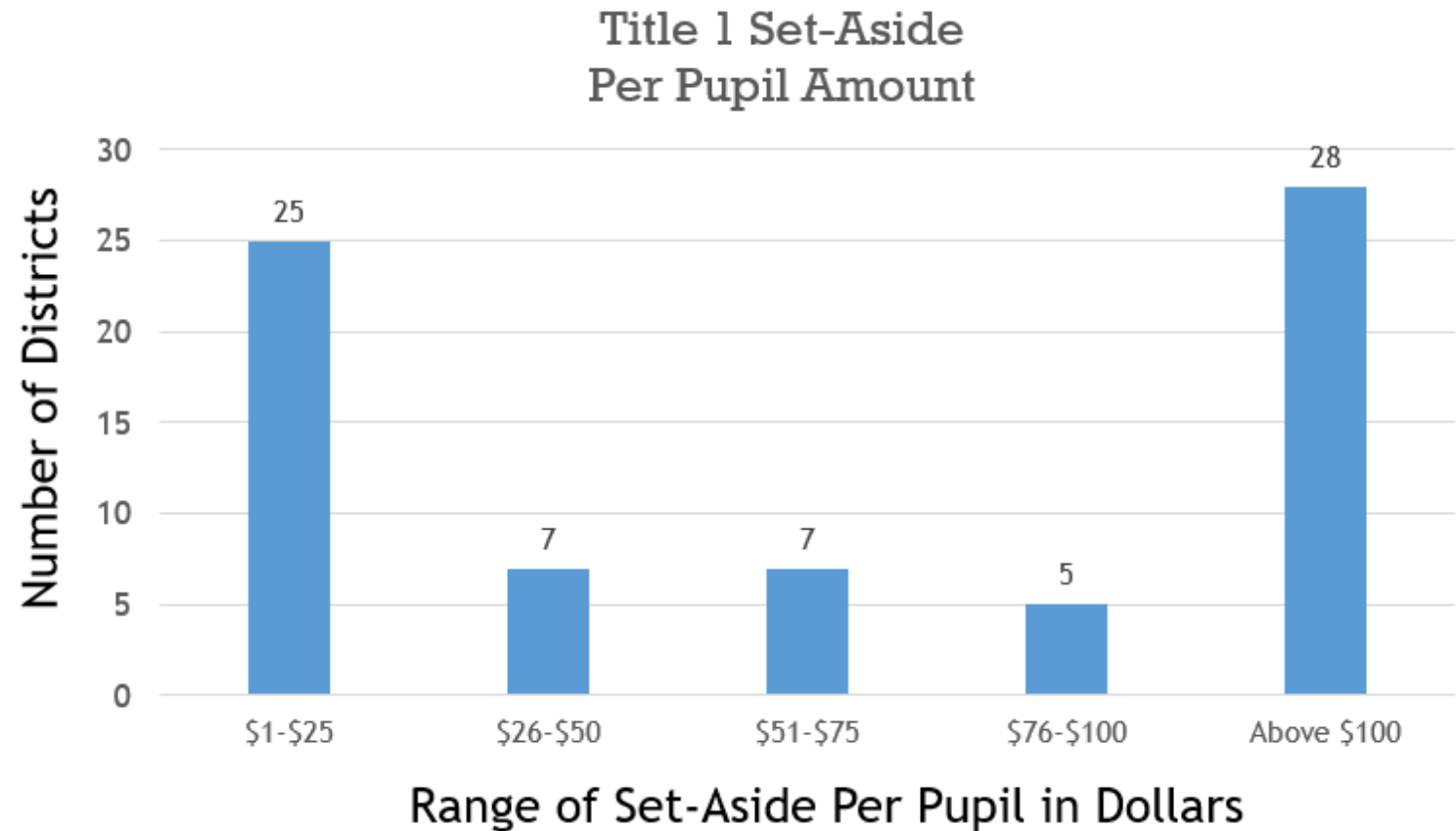
- Supplies?
- Services?



# Data Chart

This chart represents the Per Pupil amount for each District's Set-Aside. For example, if a district identified 500 MV students and Set-Aside \$5,000.00, the per pupil is  $\$5000/500=\$10$  per pupil

- 61% of Districts allocate less than \$100 per pupil in their Title 1 Set-Aside (44 Districts)
- Even if a district has over \$100 per pupil, it is still a best practice to evaluate the plans for those Set-Aside dollars
- 3 Districts have no identified students, making a negative amount per pupil (not included in the data set)





# What does compliant mean?



# Title I, Part A Set Aside Guidance from US Department of Education

The United States Department of Education recommends a local educational agency (LEA) allocate a minimum of \$100 per pupil identified, with the higher end being \$400–\$500 per pupil and a reasonable per pupil amount being \$300.

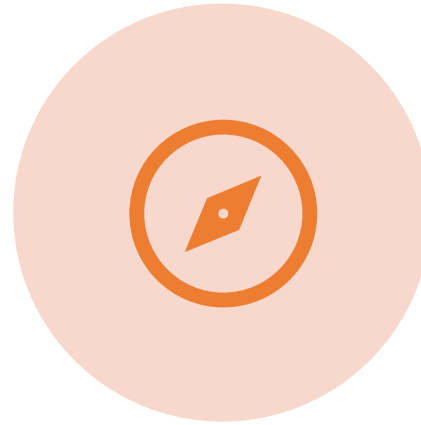
For example, if a District's last MV verified count was 30 students identified, a proposed range would be \$3,000–\$15,000 for the district's Title I set-aside.



# What are you doing already that *may* not be included in your Set-Aside



PROGRAM



POSITION



TRANSPORTATION

# Beyond the Backpack:

## What could be included in your Title I, Part A Set-Aside.

Salary(ies): MV Liaison,  
transportation staff,  
community outreach  
workers

Transportation (not just  
to and from school)

Fully support attending  
classes and participating  
fully in school activities  
42 U.S.C. § 11434a(1)

Legal documents  
(immunization, birth  
certificate, medical  
records, MV Liaison able  
to request BC)

Provide Laundry Service  
Opportunities

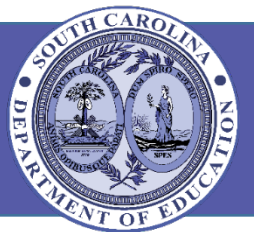
Tutoring

Mental Health Services

Medical Services

Parent-Family  
Engagement Activities

Fees (field trip, after-  
school care, college  
application  
fees/waivers)



# Who's at the Table?



Title I Coordinator

McKinney-Vento Liaison

Finance Team



# Conversation Starters



Schedule the conversation (after the winter break) to ensure your students' needs can be included in the Title I , Part A funding application.



Bring information on the number and grade levels of MV identified students



Review the MV data for academic achievement



Share the services and supports that McKinney-Vento students need



Bring attendance and graduation rate data that can add context to your conversation



# Who is missing?



© CanStockPhoto.com

Title III

Special Education

Migrant Education

School counselors

School social workers

Transportation

Preschool and after school programs

Truancy and attendance officers and SROs

Nurses

Food Services

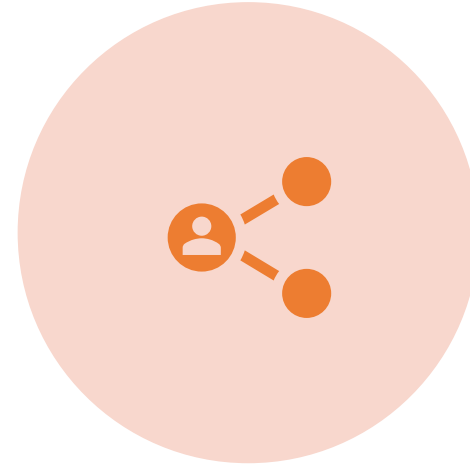
Family/Parent involvement staff



# How do we improve/increase our district's Set-Aside?



DISCUSS IN GROUPS



SHARE OUT



# State Level Point of Contact

Please use your point of contact for Technical Assistance regarding McKinney-Vento, including grants and any other questions

## SCDE McKinney-Vento Team Contact

General Email:  
mckinneyvento@ed.sc.gov

Birley Wright  
bwright@ed.sc.gov  
803.734.8563



Kim Humphrey  
khumphrey@ed.sc.gov  
803.734.3759



-Abbeville	-Laurens 56
-Aiken	-Lexington 1
-Anderson 2	-Lexington 2
-Anderson 3	-McCormick
-Bamberg	-Marlboro
-Barnwell	-Oconee
Consolidated	-Pickens
-Berkeley	-Richland 2
-Calhoun	-Saluda
-Chesterfield	-Spartanburg 1
-Colleton	-Spartanburg 4
-Dillon 4	-Spartanburg 6
-Dorchester 2	-Union
-Edgefield	-York 1
-Fairfield	-York 4: Fort Mill
-Florence 2	-SC Public
-Florence 5	Charter
-Georgetown	-Charter Institute at Erskine
-Greenwood 51	-John de la Howe
-Hampton	-Juvenile Justice
-Jasper	-SC Governor's Arts and Humanities
-Kershaw	

-Allendale	-Lee
-Anderson 1	-Lexington 3
-Anderson 4	-Lexington 4
-Anderson 5	-Lex/Richland 5
-Barnwell 45	-Marion
-Beaufort	-Newberry
-Charleston	-Orangeburg
-Cherokee	-Richland 1
-Chester	-Spartanburg 2
-Clarendon	-Spartanburg 3
-Darlington	-Spartanburg 5
-Dillon 3	-Spartanburg 7
-Dorchester 4	-Sumter
-Florence 1	-Williamsburg
-Florence 3	-York 2: Clover
-Greenville	-York 3: Rock Hill
-Greenwood 50	-Limestone Charter
-Greenwood 52	-School Deaf and the Blind
-Horry	-Palmetto Unified
-Lancaster	-SC Governor's Science and Mathematics
-Laurens 55	



# Questions



# Contact Information

Birley Wright, M.Ed.  
Education Associate,  
McKinney-Vento State  
Coordinator

[bwright@ed.sc.gov](mailto:bwright@ed.sc.gov)

803.734.8563

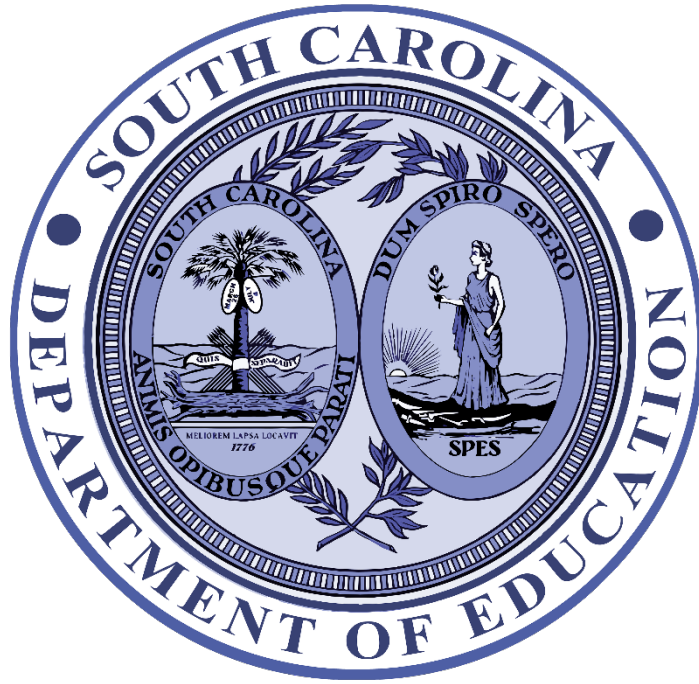


Kim Humphrey, MSW  
Education Associate,  
McKinney-Vento Manager  
Foster Care Point of Contact

[Khumphrey@ed.sc.gov](mailto:Khumphrey@ed.sc.gov)

803.734.3759



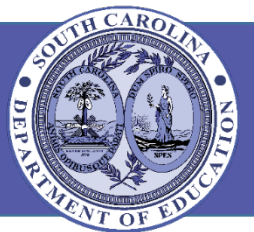


# Title II, Part A Supporting Effective Instruction

Jennifer Rhodes/Theresa Gregory  
Office of Federal and State Accountability

# Overview

- The purpose of the Title II, Part A grant is to:
  - Increase student achievement consistent with challenging state academic standards
  - Improve the quality and effectiveness of teachers and principals
  - Increase the number of teachers and principals who are effective in improving student academic achievement in schools
  - Provide low-income and minority students greater access to effective teachers and principals

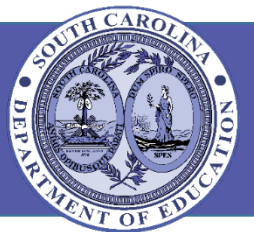


# Stakeholder Involvement

LEAs must consult meaningfully with a wide array of stakeholders on the LEA's plan for carrying out Title II activities. LEAs must also conduct ongoing consultation with those stakeholders to update and improve activities supported with Title II funds.

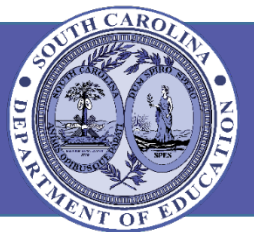
Stakeholders include teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders (in a LEA that has charter schools), parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet Title II purposes.

ESEA, Section 2102(b)(2-3)



# Priority

- LEAs must prioritize Title II funds to schools that:
  - Are implementing comprehensive support and improvement (CSI) activities and targeted support and improvement activities (TSI)
  - Have the highest percentage of economically disadvantaged students



# Allowable Uses of Funding

- Initiatives to recruit and retain highly effective (HE) teachers
- Professional development to increase teacher knowledge and improve instruction in the classroom
- Professional development to improve the quality of instructional leadership teams, principals, and other school leaders
- Multiple career paths
- Teacher advancement initiatives





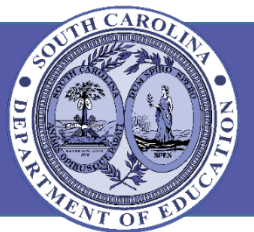
# I. Recruit, Hire, and Retain Effective Teachers

- Signing bonuses
- Expert help in screening candidates and enabling early hiring
- Differential and incentive pay in high-need academic subject areas and specialty areas
- Recruitment fair registrations and travel
- Induction and mentoring programs for new educators, including early release time for mentoring compensation for mentors and evidence-based PD for novice educators and mentors
- Training on how to accurately differentiate performance, provide useful feedback, and use evaluation results to inform decision-making about PD, improvement strategies, and personnel decisions
- A system for auditing the quality of evaluation and support systems
- Class size reduction
- Advancement and professional growth opportunities, including funds to compensate teachers for their increased leadership roles and responsibilities



# Continued Educator Supports:

- Recruiting qualified individuals from other fields to become teachers, principals, or other school leaders, including mid-career professionals from other occupations, former military personnel, and recent graduates of institutions of higher education with records of academic distinction
- Developing feedback mechanisms to improve school-working conditions, including periodically and publicly reporting feedback on educator support and working conditions
- Teacher residency programs that meet certain requirements
- Time for collaborative planning, curriculum writing, peer observations, and leading trainings, which may involve using substitute teachers to cover classes during the school day



# Continued Educator Supports, cont'd:

- Teacher-leader hybrid roles that allow teachers to provide instructional coaching to colleagues while remaining in the classroom, as well as other responsibilities, such as collaborating with administrators to develop and implement distributive leadership models and leading decision-making groups
- Providing financial support to educator recruitment programs within the community to improve hiring and retention of a diverse workforce
- Career advancement opportunities for current staff members, such as paraprofessionals, to gain the credentials to become classroom instructors
- Partnering with teacher preparation providers, including local community colleges, Institutions of Higher Education, Minority Serving Institutions, and alternative route providers, to build a pipeline of diverse candidates



# Class Size Reduction (CSR)

LEAs may reduce class size by creating additional classes in a particular grade or subject and placing qualified teachers hired with program funds in those classes.

- Federal funds cannot be used to meet state or local class size requirements.
- The school and grade level for CSR must be documented in the Needs Assessment and listed in the online application.
- CSR cannot be used for gifted or SPED programs.



# CSR - Required Documentation

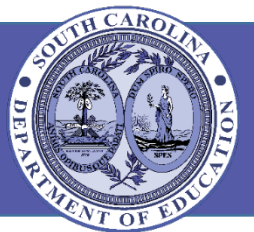
- CSR Worksheet
- School master schedule in chart format for each school that has a CSR teacher
- Daily schedules or teachers grouped by grade level or content area
  - Self Contained: Grade level, total number of students in each class
  - Departmentalized: Course name for each class, total number of students in each class
- Semi-annual certification(s)



## II. Professional Development Definition

The term “professional development” means activities that are -

1. An integral part of the district’s strategies for providing educators...with the knowledge and skills necessary to enable students to succeed in a well-rounded education and to meet challenging state standards; and
2. Sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused.



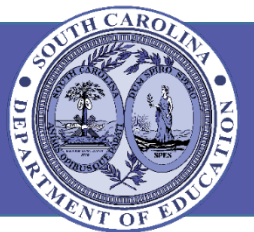
## II. PD - Teachers

- Improve content knowledge
- Improve instructional practices such as:
  - Addressing the needs of students with different learning styles
  - Improving student behavior in the classroom
  - Involving parents in their child's education (especially MLs)
  - Understanding and using data and assessments to drive instruction
  - Integrating technology into instruction
- Supplements, stipends, and substitutes



# PD - Additional Compensation

- **Supplements**: Funds received for providing services above and beyond salary; commonly used for funding mentors and paying teachers to provide professional learning
- **Stipends**: Given to certified personnel for having successfully completed PD that has occurred outside of the employee's contracted hours
- **Substitutes**: Can be funded from Title II for time teachers are out of the classroom attending a Title II funded PD

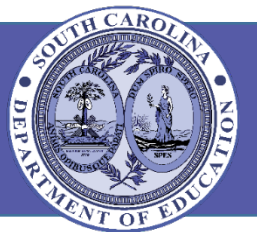




# PD - Supplies

Title II funds can be used to purchase PD supplies that are reasonable and necessary to carry out the PD.

- MAY purchase professional learning books for a book study on a topic that aligns with the needs assessment
- MAY NOT purchase books to stock a professional learning reference library
- MAY purchase 15 graphing calculators for 15 teachers to use during PD on math content
- MAY NOT purchase a classroom set of graphing calculators for the teacher to implement the strategies learned



# III. PD - Leadership

Under Section 2103 (b)(3)(E) of ESEA, as amended by ESSA, districts may use Title II funds to provide PD for:

- Teachers
- Instructional leadership teams
- Principals
- Other school leaders



# School Leader Definition

Section 8101(44) of ESSA defines “school leader” as a principal, assistant principal, or other individual who is:

- A. An employee or officer of an elementary or secondary school, district, or other entity operating an elementary or secondary school; **AND**
- B. Responsible for the daily instructional leadership and managerial operations in the elementary or secondary school building.



# “Other School Leader” Definition

- Historically, the SCDE has applied a very narrow definition of “other school leaders.”
- After consultation with Brustein & Manasevit, the SCDE has been advised to broaden its interpretation.
- Therefore, any kind of assistant principal, department or grade level chairperson, media center specialist, school counselor, etc. may be considered a “school leader” if the definition of “school leader” in Section 8101(44) is met.



# PD - Leadership

- Professional development to help principals and superintendents become outstanding managers and educational leaders
- Development and support of academies to help talented aspiring principals or superintendents



# IV. Multiple Career Paths

- PACE
- CATE Work Based Certification Program
- Teach for America
- EPI



# V. Teacher Advancement

- Promote professional growth
- Emphasize multiple career paths
  - Mentor training
  - Additional certifications (Montessori, GT, ESOL, etc.)
  - National Board
  - Advanced degrees



# Transferability of Funds

- LEAs may transfer funds from: Title II or Title IV
- LEAs may transfer funds to: Title I, Migrant, Neglected and Delinquent, Title II, Title III, Title IV, or Title V
- The funds transferred become subject to all rules and regulations for the grant they are transferred into.
- LEAs must consider how the transfer will impact the required set-asides (Title I) and equitable services.
- The SCDE Title II Coordinator must be notified in writing about the LEA's intent to transfer funds to another grant prior to submitting an application and budget.





# Highly Qualified

- With the reauthorization of ESEA, HQ requirements were removed from law.
- LEAs should hire teachers who are properly certified for their teaching assignment.
- States began defining IOI in 2017-18 and began reporting data with the 2018-19 school year.



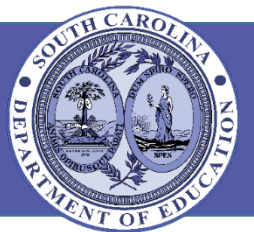
# Parents' Right to Know

- This requirement has not been removed from law.
- Must notify parents in a format that is understandable, in a medium that will reach all parents, and in a language the parent will understand
- Ensure the notification includes the principal's contact information, the school's or LEA's name, and the date of notification



# Parents' Right to Know, cont'd

- Must notify parents that they may request the following information regarding their child's teacher:
  - Whether the teacher has met the SC certification requirements for the grade level and subject area in which the teacher provides instruction
  - Whether the teacher is teaching under an emergency or other provisional status through which SC qualifications or certification criteria have been waived
  - The college major and any graduate certification or degree held by the teacher
  - Whether the student is provided services by the paraprofessionals, and if so, their qualifications



# 20-Day Letter

- Title I schools are required to notify parents when their child is assigned to or taught for 20 or more consecutive days by a teacher who is not properly certified for the teaching assignment.



# Supplement, Not Supplant

- Title II funds may be used only to supplement educational program activities provided with state and local funds.
- The LEA may not use Title II funds to pay for activities that, in the absence of these funds, would be provided with state and local funds.
- Title II funds may be used to fund only the PD activities that supplement those mandated locally or by the state and can supplement those discretionary PD activities that the LEA would fund in the absence of other local and/or state funding.



# Resources:

[Non-Regulatory Guidance: Building Systems of Support](#)

[Study Highlights: State and District Use of Title II, Part A Funds in 2019-2020](#)



# Table Talk:

- \*What stands out to me...
- \*What am I still curious about...
- \*How does my district currently utilize Title II funding?



# Private Schools

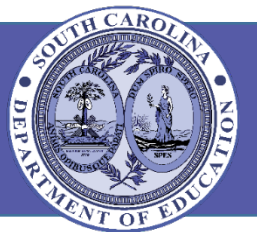




# Private Schools

Private school teachers, principals, and assistant principals are eligible to participate in the Title II, Part A program.

- Private school must hold non-profit status to be eligible
- Two options:
  - Participate with district
  - Receive allocation which remains managed by the district

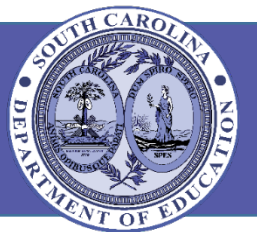


# Invitation to Participate

Invitations should be:

- Sent to private schools within the geographic boundaries of the district
- For involvement in the next fiscal year
- Mailed in a timely fashion in order to allow the participants the opportunity to take part in the annual needs assessment
- Mailed by USPS registered receipt

\*Can coordinate mailing with other federal programs



# Calculating Private School Allocations

- The equitable allocation is based on the LEA's **total** Title II, Part A allocation.

$$\begin{array}{r} \text{Total Public School Students} \\ + \text{ Total Participating Private School Students } \\ \hline \text{Total Number of Students} \end{array}$$

Title II Allocation / Total # of Students = Per Pupil Amount

Per Pupil Amount x # of Students Enrolled in the  
Participating Private School = Private School Allocation



# Calculation Examples for Private School Allocations

Formula to Determine Amount for Equitable Services			
	Example	Example	Example
A. Number of Students	A	B	C
A <sup>1</sup> District student enrollment	9,800	5,798	8,991
A <sup>2</sup> Participating private school enrollment	464	540	254
A <sup>3</sup> Total number of students (A1 + A2)	10,264	6,338	9,245
B. Title II Part A Total Allocation	306,141	284,508	372,316
D. Per Pupil Rate	\$29.83	\$44.89	\$40.27
E. Equitable Services			
E Amount district must reserve for equitable services for participating private schools (A2 x D). For more than one private school, multiply the per pupil rate by the individual school enrollment from A2.	13,841.12	24,240.60	10,228.58

# Private Schools

## Needs Assessment

- Ensure timely and meaningful consultation
- Document the meeting
  - Meeting notification
  - Sign-in sheet
  - Minutes



# Private Schools

## Needs Assessment (continued)

Private school officials should provide input into the planning of the LEA's program activities.

- How students' needs inform the professional learning needs of teachers and principals
- What services will be offered
- How, where, and by whom the services will be provided
- How the services will be assessed



# Private Schools

## Permissible Uses of Funds

- Title II funds may be used for professional development activities for teachers, principals, and headmasters to address the specific needs of their students.
  - **All funds must be under the control and supervision of the public agency responsible for providing the equitable services (i.e., the district).**
- To the extent that teachers attend a faith-based conference, Title II funds may be expended to pay for the portion of the conference costs determined to represent the secular PD in which the teacher participated.



# Private Schools

## Permissible Uses of Funds (continued)

- Private schools may not use Title II funds for class size reduction because a private school's contracts for its teachers would be inconsistent with the requirements of ESEA section 8501 (d) regarding public control of funds and the supervision and control of employees or contractors.





# Private Schools

## Reimbursement

- Districts cannot reimburse private schools directly
- Only the district may obligate and expend federal funds
  - District must procure services
  - District must purchase materials
  - District must reimburse individual teachers/principals
- District must ensure expenses are reasonable, necessary, and allocable.



# Terms/Timelines of Grant



- Discussed during initial consultation
- Private schools CAN use the funds past 1 year
- Allowed to use entire time of the grant

# Denial of Funds

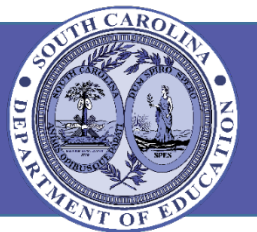


- Private schools can deny the funds after they receive their allocation
- Must be offered to the remaining participating private schools
- If they accept, recalculation must be completed
- If they deny additional funds, LEA may use in public schools
- **NOTE:** Must be communicated during the consultation

# QUESTIONS

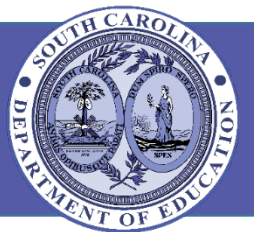


# Charter Schools



# Charter Schools

- Charter schools in South Carolina are public schools - either charter is held by district, SCPCSD, TCIE, or Limestone
- If your district holds the charter, treat the charter school as any other school in your district
- If part of SCPCSD, TCIE, or Limestone, the charter school will receive Title II services through SCPCSD, TCIE, or Limestone



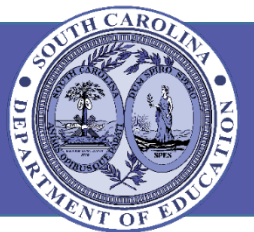
# Parents Right to Know

- This requirement has not been removed from law.
- Must notify parents in a format that is understandable and in a medium that will reach all parents (must provide in a language the parent will understand)
- Ensure the notification includes the principal's contact information, the school or LEA name, and the date of notification.



# Parents Right to Know

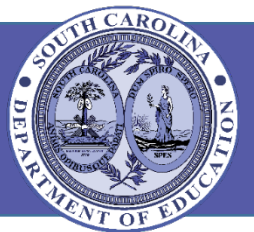
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  - The college major and any graduate certification or degree held by the teacher
  - Whether the student is provided services by the paraprofessionals, and if so, their qualifications
- LEAs are required to notify parents of children in Title I schools when their child is assigned to or taught for 20 or more consecutive days by a teacher who is not properly certified for the teaching assignment.





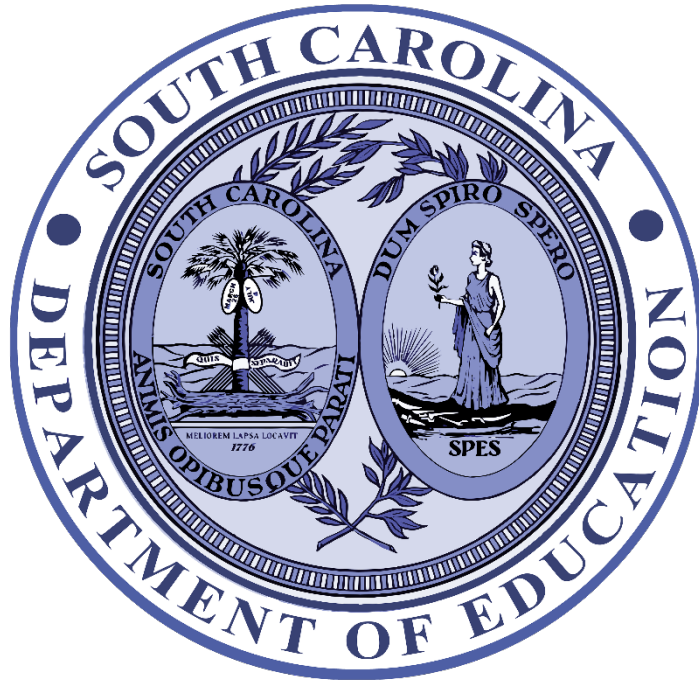
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- The funds transferred become subject to all rules and regulations for the grant they are transferred into.
- LEAs must consider how the transfer will impact the required set-asides (Title I) and equitable services.
- Transfer forms should always be updated and uploaded if changes occur.



# QUESTIONS





# Title IV, Part A: Student Support and Academic Enrichment

Martha Walker  
Office of Federal and State Accountability

# Background

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Under subpart 1 of Title IV, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as reauthorized by the Every Student Succeeds Act of 2015

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The South Carolina Department of Education first introduced this grant as the 18 Title IV grant.



## Background

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In general, the Department allocates the SSAE program funds to states by formula based on each state's share of funds under Title I, Part A of the ESEA (ESEA section 4103(b)).

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SEAs award SSAE sub-grants to LEAs by formula in the same proportion as to the LEAs' prior year's Title I, Part A allocations (ESEA section 4105(a)(1)).



# LEA Allocations

Reservation: State  
Administration -  
1% of total

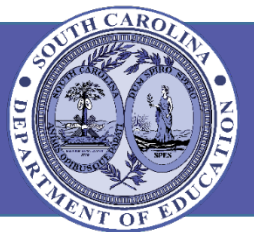
Reservation: State  
Level Activities -  
2% of total

LEA Allocations:  
97% - Remainder  
of total



# Period of Performance

- Each grant is open for a 27-month period
  - 2022 Grant: July 1, 2021- September 30, 2023
  - 2023 Grant: July 1, 2022- September 30, 2024
  - 2024 Grant: July 1, 2023- September 30, 2025
- The state's fiscal year ends June 30th. Therefore, claims through June 30th of each year must be submitted in GAPS by August 15th.



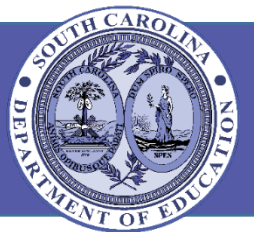
## Supplement, Not Supplant

---

Title IV funds may be used only to supplement educational program activities provided with state and local funds.

---

The LEA may not use Title IV funds to pay for activities that, in the absence of these funds, would be provided with state and local funds.





# Record Retention



All financial and programmatic records and supporting documents must be kept for **six** years after the expiration of the grant.



If any litigation, claim, negotiation, audit, or other action involving the records arises, records must be retained until resolution or until the end of the regular 6-year period, whichever is later.



# Transferability of Funds

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LEAs may transfer funds to other ESSA programs.

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The funds transferred become subject to all rules and regulations for the grant they are transferred into.

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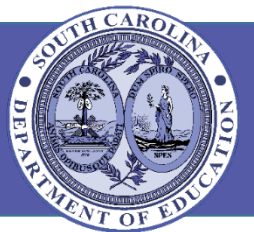
LEAs must consider how the transfer will impact the required set-asides (Title I) and equitable services.

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The SCDE Title IV program manager must be notified in writing about the LEA's intent to transfer funds to another grant prior to submitting an application and budget.

---

Transfer forms must align with allocation amounts. Update and reupload when necessary.



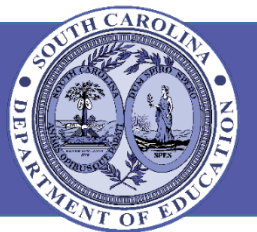
# Transferability of Funds Allowability

Title IV funds can transfer to the following programs:

- Title I
- Title II
- Title III
- Title V (if your district is a recipient of Title V funding)



# Content Area Overview

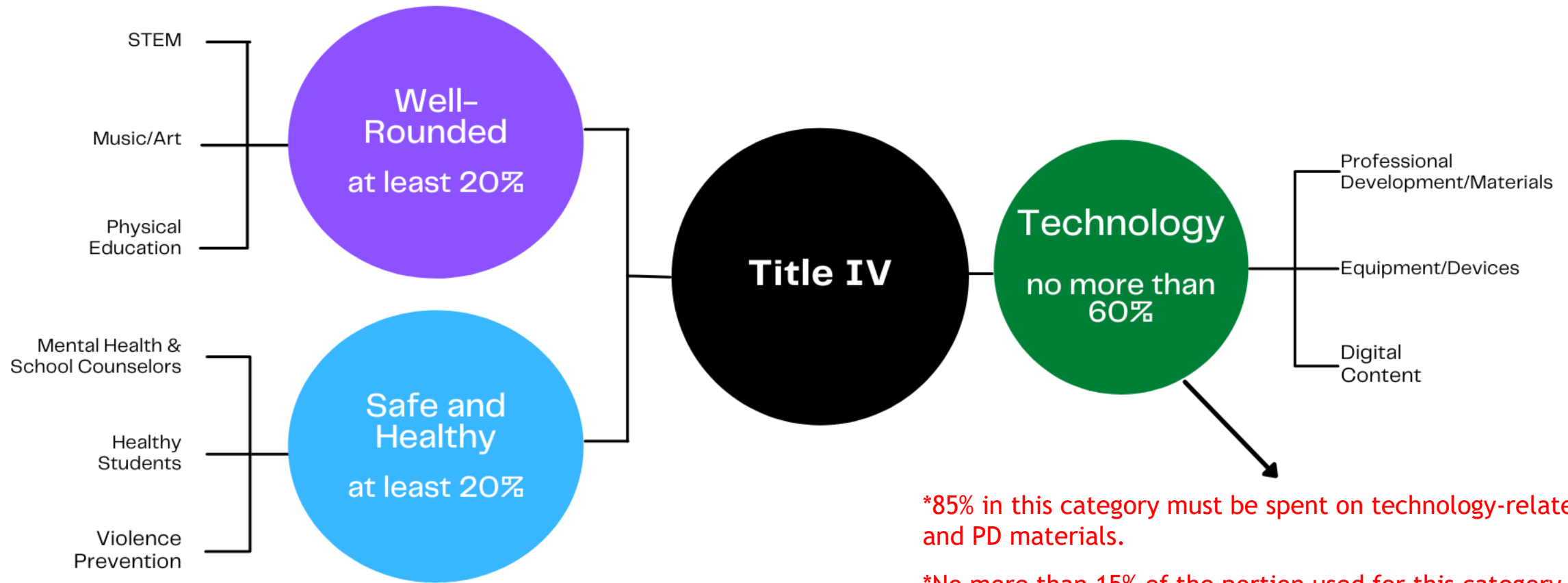


# OVERVIEW

- The (SSAE) program is intended to improve student academic achievement by increasing the capacity of state educational agencies, local educational agencies (LEAs), schools, 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.



# Districts or schools that receive above \$30,000 must do a needs assessment and spend:



\*85% in this category must be spent on technology-related PD and PD materials.

\*No more than 15% of the portion used for this category may fund technological infrastructure, which includes devices, equipment, software applications, platform, digital instructional resources, and/or other one-time IT purchases.

# Percentages Example

Total Allocation: \$60,000

Well-  
Rounded  
\$15,000

Safe &  
Healthy  
\$20,000

The Effective Use of  
Technology  
\$25,000

Professional  
Development  
\$21,250

Technology  
Infrastructure  
\$3,750



# Content Area Allowability

Title IV, Part A Allowable Uses of Funds  
March 2023

[Title IV Allowability Chart March 2023.pdf](#)





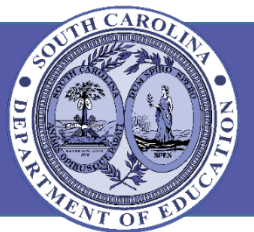
# Content Area 1 – Well Rounded

- Improving access to foreign language instruction, arts, and music education
- Supporting college and career counseling, including providing information on opportunities for financial aid through the early FAFSA
- Providing programming to improve instruction and student engagement in science, technology, engineering and mathematics (STEM), including computer science, and increasing access to these subjects for underrepresented groups
- Promoting access to accelerated learning opportunities including Advanced Placement (AP) and International Baccalaureate (IB) programs, dual or concurrent enrollment programs, and early college high schools
- Strengthening instruction in American history, civics, economics, geography, government education, and environmental education



# Content Area 2 – Safe & Healthy-Back to the Basics

- Promoting community and parent involvement in schools
- Providing school-based mental health services and counseling
- Promoting supportive school climates to reduce the use of exclusionary discipline and promoting supportive school discipline
- Establishing or improving dropout prevention
- Supporting re-entry programs and transition services for justice-involved youth
- Implementing programs that support a healthy, active lifestyle (nutritional and physical education)
- Implementing systems and practices to prevent bullying and harassment
- Developing relationship building skills to help improve safety through the recognition and prevention of coercion, violence, or abuse
- Establishing community partnerships



# Content Area 3 – Technology

- Supporting high-quality professional development for educators, school leaders, and administrators to personalize learning and improve academic achievement
- Building technological capacity and infrastructure
- Carrying out innovative blended learning projects (*initial professional learning for educators on effective blended learning model instruction, ongoing collaborative planning time, and ongoing, job-embedded professional learning opportunities to improve educator practice. These ongoing opportunities could include access to digital professional learning resources, a collaborative community of practice, and/or coaching*).
- Providing students in rural, remote, and underserved areas with the resources to benefit from high-quality digital learning opportunities
- Delivering specialized or rigorous academic courses and curricula using technology, including digital learning technologies and assistive technology (*schools must make assistive technology available to students with disabilities when that technology is necessary to provide access to the curriculum for the student to receive a free appropriate education under the Individuals with Disabilities Education Act and section 504 of the Rehabilitation Act.*)



# Technology

- The SSAE program funds can also be used to help educators *learn how to use technology to increase the engagement of Multilingual Learners(ML) students* and communication with parents and caregivers of MLs, as well as parents and caregivers who are not proficient in English.
- An LEA could choose to purchase and implement a professional learning platform or software that would support virtual coaching and/or provide just-in-time professional development that enables educators to learn how to use technology more effectively. (*Educators in rural areas, isolated community schools, and/or who are the sole teachers in their school or district of particular content, such as the arts or STEM, may especially benefit from such implementations*).



# ALLOWABLE USE OF FUNDS - EXAMPLES

Well-Rounded Education	Safe & Healthy Students	Effective Use of Technology
<b>ACCESS &amp; OPPORTUNITY</b> A Students' Civil Right!	<i>Evidence-based activities</i>	<i>Evidence-based activities</i>
<ul style="list-style-type: none"> <li>➤ Arts Education</li> <li>➤ Advanced Learning (AP/IB/Dual Enrollment, etc.)</li> <li>➤ American History, Economics, Civics, Environmental Ed</li> <li>➤ College &amp; Career Counseling</li> <li>➤ Foreign Language</li> <li>➤ Gifted Education</li> <li>➤ Physical Education</li> <li>➤ Professional Development</li> <li>➤ Social &amp; Emotional Learning</li> <li>➤ STEM / STEAM</li> <li>➤ And Much More!</li> </ul>	<ul style="list-style-type: none"> <li>➤ Community Partnerships</li> <li>➤ Conscious Discipline</li> <li>➤ Dropout Prevention</li> <li>➤ Mental Health Services and Counseling</li> <li>➤ Parent and Family Engagement</li> <li>➤ Professional Development</li> <li>➤ PBIS and SEL programs</li> <li>➤ Physical Activity/Wellness</li> <li>➤ Restorative Justice</li> </ul>	<ul style="list-style-type: none"> <li>➤ PD for teachers, students, administrators to effectively <u>use</u> technology</li> <li>➤ Blended Learning</li> <li>➤ Flipped Classrooms</li> <li>➤ Independent Study</li> <li>➤ Technology Integration PD</li> <li>➤ Technology Infrastructure*</li> </ul> <p style="text-align: right; font-size: small;">*may be subject to the 15% Special Rule</p>

# CHANGES TO GEMS-Program Details Page

Title IV Part A funds are made available to LEAs for student support and academic enrichment.

## Instructions

Transferring Title IV, Part A Funds page must be completed prior to completing this page. Item 1-Transfer to Other Title Grants will auto-populate, based upon what is entered on the transfer page.

Select the check box in front of the items for which Title IV-A funds will be assigned.

In completing the text descriptions below for each of the three activities/focus areas (boxes 2, 3, and 4), be sure you describe: (a) the activities (evidenced based programs and practices), (b) the objectives, (c) the intended outcomes, and (d) the method that will be used to evaluate the effectiveness of the activity (what data will be collected regularly and how will that inform future implementation).

## Validation rules on this page.

If the LEA has an adjusted allocation (Title IV allocation minus transfers) of \$30,000 or more:

- 1) All three "Activities" areas must be supported, with amount and description provided.
- 2.)The amounts assigned assigned to Well Rounded Educational Opportunities and Safe and Healthy Students must each be at least 20% of the adjusted allocation; minimums are indicated below.
- 3) At least some funds must be spent for Effective Use of Technology.

*Special Rule for Infrastructure: Funds specific to infrastructure cannot exceed 15% of the amount allocated to Technology..*



If the LEA has an adjusted allocation of less than \$30,000, at least one "Activity" or focus area must be supported, and there is no minimum amount. Be sure to provide both the amount and a description of the initiative(s).

The sum of Options 1 through 6 below must equal the Title IV Part A grant allocation for the district.

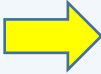
When completing the budget, there is a new tag group "Focus Area" which lists the options 1-6 below. The amounts for each tag item must equal the the amounts below. For example, the total for all details marked as Well-Rounded Educational Opportunities in the budget must equal the amount entered below for that option.





# Program Details Page

4. Activities to support Effective Use of Technology

LEAs with an adjusted allocation of \$30,000 or more must use some funds for Effective Use of Technology.	Amount 	At least 85 percent of the educational technology funds in this category must be used to support professional learning to enable the effective use of educational technology. Only educational technology professional learning activities should be entered in the box below. If you have items that are considered technology infrastructure, please place a checkmark in the box below to enter those items.
In the field to the right, enter the total amount for Effective Use of Technology (infrastructure AND non-infrastructure). If any portion of this amount is for infrastructure, check the box below and enter the portion that is for infrastructure only.	* \$ <input type="text"/>	* <input type="text"/>

☐ Check if your proposed grant includes expenditures for technology infrastructure. LEAs may not spend more than 15 percent of funding in this content area on infrastructure, including devices, equipment, software applications, platforms, digital instructional resources and/or other one-time IT purchases.

\$  \* Enter the amount included in your Technology amount entered above that will be spent for infrastructure, not to exceed 15% of the amount for the Technology focus area.

\* Describe the strategy for funds used for technology infrastructure.



# Needs Assessment (NA)





# Title IV Is A Needs Based Program

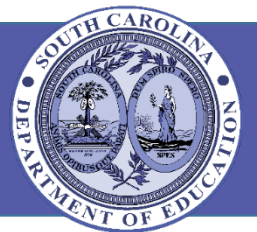
The LEA will prioritize the distribution of funds per the approved application and to schools served by the LEA that are among the schools with the greatest needs, as determined by the LEA.

## *Needs versus Wants*

- It's easy to focus on your allocation dollar amount and try using it for something you want, the "Nice to Have" program.
- But the intent of the program is to determine the **needs** of the school and students and provide **student support and academic enrichment** in one or more of the three focus areas.
- There is **flexibility** and room for **innovation**, but still is based on a demonstrated **need**.



# Title IV: Program Development Steps



# Needs Assessment Stakeholders

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Teachers

---

Principals

---

Other School Leaders

---

Instructional Support Personnel

---

Private School Administrators

---

Parents

---

Students

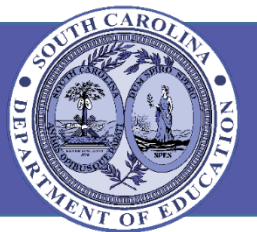
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Local Government Representatives

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Community Based Organizations

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# Implementing Effective Activities

## Non-Regulatory Guidance (pages 15-18)

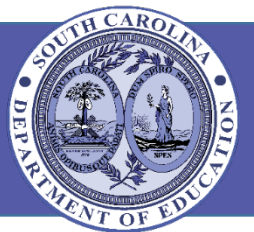
- NA must be comprehensive and examine areas for improvement related students' access to well-rounded educational opportunities, learning conditions that cultivate a safe and healthy environment for students, and effective use of technology.
- Select evidence-based activities that are more likely to improve student outcomes.



# Implementing Effective Activities

Plan for Implementation; such plans typically include the following components:

- A logic model, which demonstrates a theory of action by visually connecting the activity to expected outcomes that are stated as well-defined and measurable goals and clarifies how the activity will work;
- Well-defined, measurable goals with implementation timelines;
- Clearly outlined roles and responsibilities for people involved, including the people responsible for the activity's success;
- Identified resources required to support the activity;
- A process to monitor implementation; and
- An outreach strategy to regularly engage stakeholders.



# Logic Model Components

---

**Inputs** – refer to the features and people in your LEA who will be impacted by the intervention

---

**Activities** – represent the program itself

---

**Benchmarks** – the individual outcome targets that students need to meet in order to consider the intervention successful

---

**Short-Term Outcomes** – what happens soon after program implementation

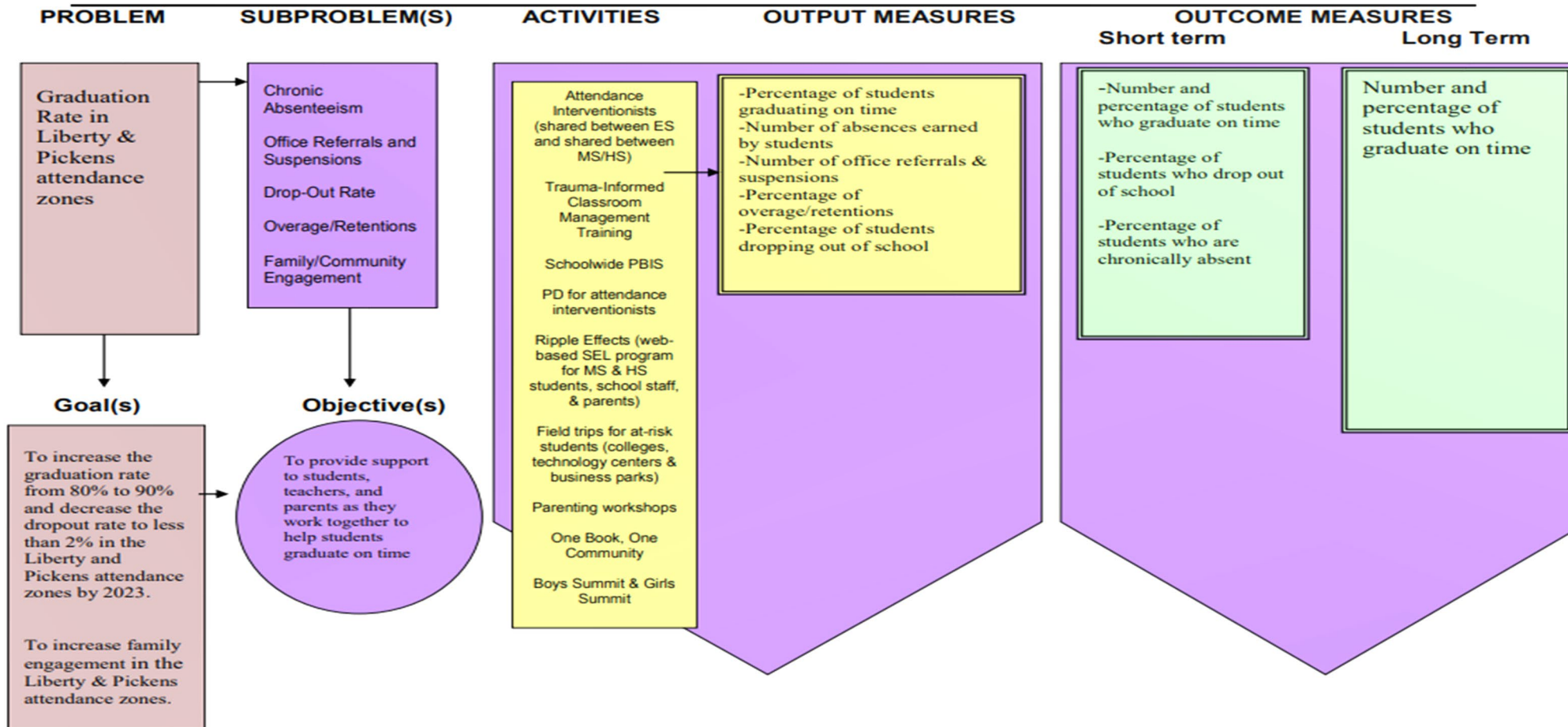
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**Long-Term Outcomes** – the "wish" factors or ultimate desired result after the intervention is finished and the students have moved on



# Logic Model Example 1

**LOGIC MODEL TEMPLATE**  
Pickens Title IV, Part A Student Support and Academic Enrichment Grant



# Logic Model Example 2

Inputs	Staff and students District Leadership Team
Problem	Percent of ML students who progressed toward proficiency target.
Subproblems	Language Barrier Lower Academic Performance Implementation of accommodations and modifications Instructional strategies for EL students
Goals	____ will increase the percent of ML students who progress toward proficiency target from 19.7% to 49.7%.
Objectives	____ will provide support to teachers and ML students as they work together to increase progression toward proficiency target.
Activities	LEA provides ESOL Coach to model lessons, accommodations, and modifications to help teachers to meet individual instructional needs of ML students. LEA provides EL instructional strategies professional development. LEA provides instructional supplies and materials. LEA collects ACCESS data.
Output Measures	ACCESS test proficiency target data.
Benchmarks	____ will increase the percent of ML students who progress toward proficiency target from 19.7% to 24.7% by the end of the first year. ____ will increase the percent of ML students who progress toward proficiency target from 24.7% to 34.7% by the end of the second year. ____ will increase the percent of ML students who progress toward proficiency target from 34.7% to 49.7% by the end of the third year.
Short-Term Outcomes	ML students receive individualized support through the implementation of instructional accommodations and modifications.
Long-Term Outcomes	Percent of ML students who progress toward proficiency target improves.



# Logic Model Example 3

Inputs	Staff and students District Leadership Team
Problem	Learning environment, social/physical environment, and home-school relations needs improvement
Subproblems	Increased social-emotional needs Increased behavioral incidents Increased discipline referrals and suspensions
Goals	By 2025, there will be an increased percentage of parents, teachers, and students across the district will agree that schools have a positive physical environment, a positive learning environment, and maintain positive home-school relations.
Objectives	____ will provide a Multi-Tiered System of Support (MTSS) to improve social-emotional needs of students. ____ will implement consistent discipline procedures across grade bands.
Activities	LEA provides Mental Health Counselors for students. LEA implements Social and Emotional Learning (SEL) curriculum. LEA provides parenting workshops. Lea provides supplies and materials.
Output Measures	Climate and Culture survey data.
Benchmarks	____ will increase the percent of parents/teachers/students who agree that their school has a positive learning environment, social and physical environment, and home-school relations from 84%/92%/86% to 85%/93%/87% by the end of the first year.  ____ will increase the percent of parents/teachers/students who agree that their school has a positive learning environment, social and physical environment, and home-school relations from 85%/93%/87% to 87%/95%/89% by the end of the first year.  ____ will increase the percent of parents/teachers/students who agree that their school has a positive learning environment, social and physical environment, and home-school relations from 87%/95%/89% to 89%/97%/91% by the end of the first year.
Short-Term Outcomes	Students receive increased behavioral and social-emotional support at school. Student receive discipline that is consistent across grade bands.
Long-Term Outcomes	Parents, teachers, and students will agree that their school provides a safe environment with support at school and at home.

# Examine and Reflect

- The final step for improving effective implementation is to examine how the activity is working and then use that information to make decisions for next steps.
- Performance Monitoring
- Rigorous Evaluations (answer questions about the impact of a specific activity on measured outcomes)
- These activities produce information that should be used to guide future investments.



# Continuous Cycle of Evaluation

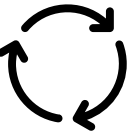
1. Ask Questions
2. Organize the Evaluation
3. Create Goals/Benchmarks
4. Design Measurements/Indicators
5. Carry Out the Evaluation
6. Report Results




[Source - T4PA Center - Evaluation Guide \(ed.gov\)](#)

# Program Evaluation Essentials

## Process Evaluation

- 
- Focuses on the implementation process
  - Is the activity working as intended?
  - Is the activity going according to plan?

## Outcome Evaluation

- 
- Focuses on achievement of stated goals and objectives
  - Does the activity have the intended impact?
  - Did the activity accomplish what it was designed to accomplish?



# Program Evaluation, Cont.

- Both process and outcome evaluation questions are critical to ask, as they provide insight into how and why interventions either succeed or fail.
- Collecting ongoing evidence ensures that the program is being carried out the way it is intended and gives the LEA feedback throughout program implementation.



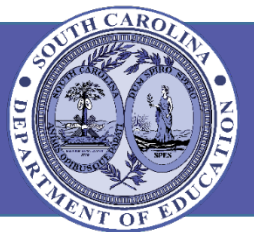
# Innovative Activity – Action Planner Resource

- Title IV-A Stakeholder Teams can use this Action Planner to think more about how to meet student-centered needs with innovative activities and evaluate them for impact.
- Answer the questions with your needs assessment data, reflections, and innovative ideas.
- Then follow through with those ideas by setting up calendar reminders and/or meetings to develop and plan activities that will meet your students' needs and to evaluate them for effectiveness.

[Title IV Activity Planner Chart 2023 Link](#)

# Additional Resources

- [Non-Regulatory Guidance Student Support and Academic Enrichment Grants -- October 21, 2016 \(PDF\) \(ed.gov\)](#)
- [Title IV 21st Century Schools - Office of Elementary and Secondary Education](#)
- [Developing Stakeholder Relationships to Support School Programming \(ed.gov\)](#)
- [Selecting Evidence-Based Programs and Practices for Title IV, Part A Activities](#)

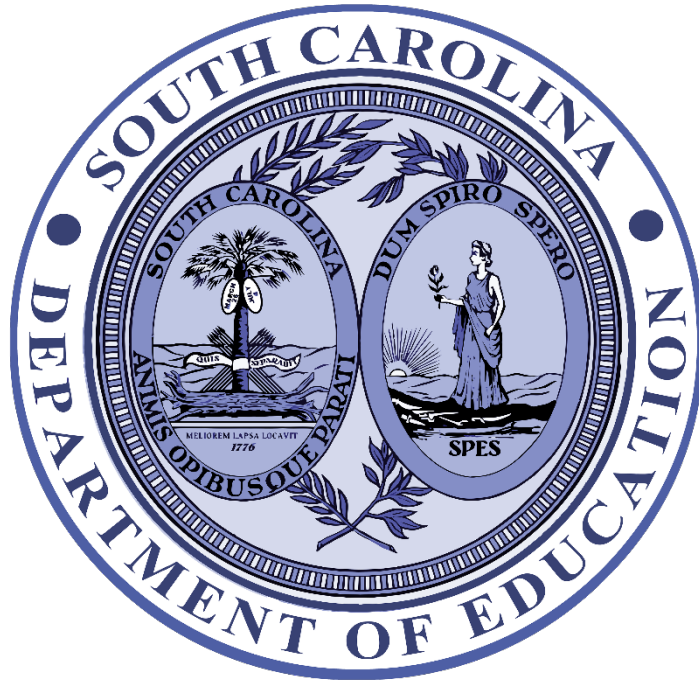


# Resources, cont'd

- Title IV, Part A Technical Assistance Center. (2022). *T4PA Center Evaluation Guide*.  
<https://t4pacenter.ed.gov/Docs/ProductResource/EvaluationGuide508C.pdf>







# Title V- REAP

Sharay Mosley  
Office of Federal and State Accountability

# Overview of Title V – Rural Education Achievement Program (REAP)

The purpose of Title V is to address the unique needs of rural school districts that frequently lack the personnel and resources needed to compete effectively for federal competitive grants and who receive formula grant allocations in too small amounts to be effective in meeting their intended purposes.

- The grant is non-competitive, and eligibility is determined by statute.
- Awards are issued annually to state education agencies (SEAs), which make subgrants to local education agencies (LEAs) that meet eligibility requirements.



# Title V Programs

- Part B of Title V of the ESEA authorizes the REAP.
- There are two programs authorized under REAP:
  - The Small Rural School Achievement Program (SRSA) provides funds targeted and designed for schools with small populations in lower-density areas. Funds are given directly to districts with designation by the National Center for Education Statistics (NCES).
  - The Rural and Low-Income Schools Program (RLIS) provides funds for states to subgrant to districts with NCES designation. RLIS funds apply more broadly and can be used for a number of purposes related to other titles of ESSA.
- The SCDE administers the RLIS.



# Eligibility for Rural Low-Income School (RLIS)

A local educational agency is eligible to receive Title V funding if the LEA meets the following criteria:

- To be considered rural, all schools comprising the LEA must have a school locale code of 32, 33, 41, 42, or 43 (assigned by NCES), or be located in an area of the State defined as rural by a governmental agency of the State.
- To be considered low-income, 20 percent or more of the children ages five to 17 served by the LEA must be from families with incomes below the poverty line, based on data from the U.S. Census Bureau's Small Area Income and Poverty Estimates (SAIPE).



# FY23 REAP Subgrantees

South Carolina Districts		
Allendale	Fairfield	Laurens 56
Anderson 3	Florence 1	Lee
Bamberg	Florence 2	Lexington 3
Barnwell 45	Florence 3	McCormick
Barnwell 48	Florence 5	Marion
Calhoun	Greenwood 50	Marlboro
Chester	Greenwood 51	Newberry
Chesterfield	Greenwood 52	Orangeburg
Clarendon	Hampton	Saluda
Colleton	Jasper	Union
Dillon 3	Laurens 55	Williamsburg
Dillon 4		

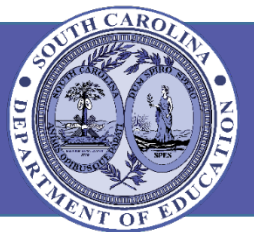
# Title V: Needs Assessment and Application

- A needs assessment must be conducted and must clearly demonstrate a need in the areas in which funds are spent.
- The assessment should include stakeholders, such as teachers, administrators, other school personnel, parents, community members, and even students when feasible.
- The assessment summary narrative should include a discussion of the data indicating the need.
- The online application should be based upon the needs assessment and allocation awarded.
- The guidance from the United States Department of Education (ED) and the SCDE should be followed when developing the plan.



# Title V: Supplement, not Supplant

- Title V funds may be used only to supplement educational program activities provided with state and local funds.
- LEAs may not use Title V funds to pay for activities that, in the absence of these funds, would be provided with state and local funds.



# Title V: Allowable Use of Funds

Grant funds awarded to LEAs under this subpart can be used for the any of the following:

- Activities authorized under Title I, Part A
- Activities authorized under Title II, Part A
- Activities authorized under Title III, Part A
- Activities authorized under Title IV, Part A
- Parental involvement activities

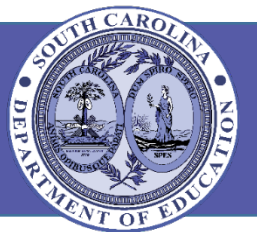




# Examples of Title V Activities Based Upon Title I Allowability

## Activities to Support:

- Teacher Incentives
- Professional Development
- Substitute Teachers
- Technology
- Instruction
- *Example: High-quality preschool or full-day kindergarten to facilitate the transition from early learning to elementary education programs*
- *Parental Involvement Example: Creation of a parental advisory committee to solicit input on various education topics*



# Examples of Title V Activities Based Upon Title II Allowability

## Instructional Staff:

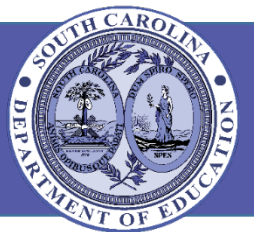
- Administrator Salaries
- Stipends
- Fringe Benefits
- Contracted Services
- Supplies, Materials, Equipment
- Travel
- *Example: High quality PD to train teachers, principals, and other school leaders on topics such as technology in the classroom, student data privacy, parent and family engagement, academic readiness skills, school policy decision-making, and experiential learning through observation*



# Examples of the Title V Activities Based Upon Title III Allowability

## Activities to Support:

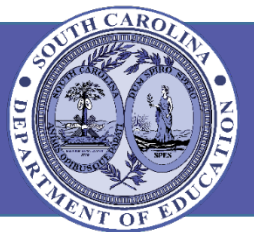
- Upgrading program objectives and effective instructional strategies
- Improving the instruction of multilingual learners
- Immigrant students
- *Example: Supplemental PD for teachers of multilingual learners*



# Examples of Title V Activities Based Upon Title IV Allowability

## Activities to Support:

- Well-rounded education
- Safe and healthy students
- Effective use of technology
- *Example: Digital resources for students in rural, remote, and underserved areas*



# New and Improved REAP Uses of Funds Guide

- The REAP Uses of Funds Guide is now a searchable webpage of example allowable uses of funds

[Office of Elementary and Secondary Education](#)

- Check for allowability or for innovative ideas
- Filter by category
- Search by an activity or topic



# REAP Resources

- For helpful resources on the RLIS grant programs, visit the REAP Quick Links: [Rural Education Achievement Program](#)
- To view recorded webinars on allowable uses of REAP funds, visit the REAP Resources webpage: [REAP Resources - Office of Elementary and Secondary Education](#)
- For information on dual-eligibility, visit the REAP Considerations for Dual-Eligible LEAs: [Considerations for Dual-Eligible LEAs - Office of Elementary and Secondary Education](#)



# Title V: Allocation Process

1. In November each year, ED provides a SC Initial Eligibility Spreadsheet to the SCDE that must be completed by SCDE.
2. SCDE completes the spreadsheet providing district allocation information on each district using Title II and Title IV final allocations.
3. SCDE also provides the “average daily attendance” for each district.
4. SCDE provides at least two (2) contacts for each district.
5. This information is due to ED no later than December 5th.
6. ED then complies this information to determine eligibility and an estimated allocation for each district.
7. Once completed, ED provides the SCDE with a “Master Eligibility Spreadsheet” which shows allocation estimation for eligible districts.



# Transferring Funds

Section 5103 of the ESEA permits an LEA to transfer funds **from** the following programs (source grants):

- Title II, Part A – Supporting Effective Instruction
- Title IV, Part A – Student Support and Academic Enrichment (SSAE)

Section 5103 allows an LEA to transfer local funds **into** any of the following programs (target grants):

- Title I, Part A - Improving Basic Programs Operated by LEAs
- Title I, Part C - Education of Migratory Children
- Title I, Part D - Neglected, Delinquent, or At Risk
- Title II, Part A – Supporting Effective Instruction
- Title III, Part A - English Language Acquisition
- Title IV, Part A – Student Support and Academic Enrichment (SSAE)
- Title V, Part B – Rural Education





# Action Steps

- An LEA may transfer all or a portion of funds allocated under Title II, Part A and Title IV, Part A. An LEA may transfer funds at any point during the 27-month period of availability of the grant into a grant award for the same fiscal year (e.g., a transfer from FY 2023 Title II, Part A funds into the LEA's FY 2023 Title IV, Part A funds).
- An LEA may only transfer funds into a program for which that LEA is receiving an allocation.
- When an LEA decides to transfer some, or all, of the funds allocated for local activities under the two eligible programs, it must take certain steps (continued next slide).



# Action Steps, cont'd

The LEA must:

1. Engage in timely and meaningful consultation, in accordance with section 8501 of the ESEA, with appropriate private school officials (5103(e)(2))
2. Determine the programs from which funds are to be transferred out of and into
3. Determine the amount and federal fiscal year of funds to be transferred
4. Establish the effective date for the transfer
5. Notify the SEA of each transfer at least 30 days before the effective date of the transfer (5103(d)(2)(C))
6. Submit, not later than 30 days after the date of such transfer, a copy of the LEA's modified plans or applications for all programs affected by the transfer to the SEA (5103(d)(2)(B))



# Resource Link:

[Fact Sheet for Transferring State and Local Level Funds \(PDF\) \(ed.gov\)](#)



# Questions



# Table Talk- How are you feeling leaving Day Two?



# Thank you for participating!

Please reach out to us if you have any questions:

- Leslie Bloss, [lbloss@ed.sc.gov](mailto:lbloss@ed.sc.gov)
- Ann Bogan, [abogan@ed.sc.gov](mailto:abogan@ed.sc.gov)
- Theresa Gregory, [tgregory@ed.sc.gov](mailto:tgregory@ed.sc.gov)
- Sharay Mosely, [smosely@ed.sc.gov](mailto:smosely@ed.sc.gov)
- Jennifer Rhodes, [jrhodes@ed.sc.gov](mailto:jrhodes@ed.sc.gov)
- Sarah Wagers, [slwagers@ed.sc.gov](mailto:slwagers@ed.sc.gov)
- Martha Walker [mwalker@ed.sc.gov](mailto:mwalker@ed.sc.gov)

