

About Integrating Funding

About ESSA Funding and Funding Integration

- CCSSO Summary of Significant Spending and Fiscal Rules in the Every Student Succeeds Act
- Funding Integration: A Sample from State Consolidated ESSA Plans
- Examples of Effort Prior to ESSA

>From Louisiana – *Funding Stream Integration to Promote Development and Sustainability of a Comprehensive System of Learning Supports*

>*Georgia Department of Education Integration and Use of Federal Funds Manual*

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Introduction

The Every Student Succeeds Act calls for state plans to include assurances that the SEA will modify or eliminate state fiscal and accounting barriers so that the schools can easily consolidate funds from other federal, state and local sources to improve educational opportunities and reduce unnecessary fiscal and accounting requirements.

The act also calls for COORDINATION OF FEDERAL PROGRAMS.

Coordination in the act refers to how funding across multiple federal program areas, in combination with state and local funds, can be braided together to better support students.

“The state plan must coordinate with other federal programs, including:

- >The Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.)
- >The Rehabilitation Act of 1973 (20 U.S.C. 701 et seq.)
- >The Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)
- >The Workforce Innovation and Opportunity Act (29 U.S.C. 3101 et seq.)
- >The Head Start Act (42 U.S.C. 9831 et seq.)
- >The Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858 et seq.)
- >The Education Sciences Reform Act of 2002 (20 U.S.C. 9501 et seq.)
- >The Education Technical Assistance Act of 2002 (20 U.S.C. 9601 et seq.)
- >The National Assessment of Educational Progress Authorization Act (20 U.S.C. 9621 et seq.)
- >The McKinney-Vento Homeless Assistance Act (42 U.S.C. 11301 et seq.)
- >The Adult Education and Family Literacy Act (29 U.S.C. 3271 et seq.)”

We have compiled and will continue to update this resource as an aid for funding integration.

This resource contains:

- CCSSO Summary of Significant Spending and Fiscal Rules in the Every Student Succeeds Act
- Funding Integration: A Sample from State Consolidated ESSA Plans
- Examples of Effort Prior to ESSA
 - From Louisiana –
 - >Funding Stream Integration to Promote Development and Sustainability of a Comprehensive System of Learning Supports
 - From Georgia Department of Education –
 - >Integration and Use of Federal Funds Manual

The big point to take away is that the need and the opportunity is to do more than coordinate among federally-funded programs.

In the long-run, the emphasis is on braiding all overlapping resources at state, district, and school levels – including a wide variety of community resources and expand thinking about the multitiered system of supports.

Braiding funds is an imperative opportunity not to be ignored.

**SUMMARY of
SIGNIFICANT SPENDING *and* FISCAL RULES
in the EVERY STUDENT SUCCEEDS ACT**

<http://www.ccsso.org/Documents/Summary%20of%20Significant%20Spending%20and%20Fiscal%20Rules%20in%20ESSA%20-%2003092016.pdf>

The Every Student Succeeds Act (ESSA), which was signed into law on December 10, 2015, makes important changes to the Elementary and Secondary Education Act (ESEA). **Most of these changes will not take effect until the 2017-2018 school year.** Until then, ESEA grants – including grants awarded in 2016-2017, will be governed by the No Child Left Behind Act (NCLB) (that is, the law in effect before ESSA was enacted) though certain provisions of NCLB, such as the Highly Qualified Teacher requirements and Supplemental Educational Services (SES) and choice are subject to transition provisions and will operate differently in 2016-2017.

For more information about ESSA timelines, including descriptions of rules that will and will not apply in 2016-2017, please see these Frequently Asked Questions from the U.S. Department of Education (ED) <http://www2.ed.gov/policy/elsec/leg/essa/faq/essa-faqs.pdf>.

This document provides a plain-language summary of some of the statutory changes to spending and related fiscal rules that will take effect in **2017-2018** under Title I, Part A (including 1003 and 1003A), Title II, Part A, Title III, Part A, Title IV, Part A, and Title VIII (general provisions).

It is important to note ED has not yet regulated or issued guidance on these issues; therefore this document only summarizes the statutory text. Because more information from ED is expected in the coming months, this summary should be seen as a starting place to help states, school districts and others identify key changes that will affect future grants.

Sections 1003/1003A and Title I, Part A

School Improvement: Section 1003

Beginning in 2017-2018, SEAs must reserve 7% of their Title I, Part A grant to support school improvement activities, or an amount that equals what the SEA received in 1003(a) and 1003(g) in 2016-2017, whichever is greater. This is an increase from the 4% required by NCLB, which could help offset ESSA's elimination of NCLB's School Improvement Grant (SIG).

Beginning with the 2018-2019 grant year, when making the 1003(a) reservation, an SEA may not reduce the amount of Title I, Part A funds any LEA received the prior year. This might limit how much the SEA can reserve under 1003.

SEAs must allocate at least 95% of the reserved funds to LEAs to serve schools implementing:

- Comprehensive support and improvement activities under 1111(d) (for the lowest performing schools and schools with high dropout rates identified by the SEA), or
- Targeted support and improvement activities under 1111(d) (for schools with consistently underperforming subgroups identified by the SEA).

Rules on how SEAs may distribute funds, and LEA application requirements, are in section 1003(e)-(f).

SEAs must spend the funds they keep at the state level (up to 5%) for:

- Establishing a method for allocating funds to LEAs,
- Monitoring and evaluating LEA uses of 1003 funds, and
- As appropriate, reducing barriers and providing operational flexibility for identified schools.

SEAs must annually report which LEAs and schools received 1003 funds, the amount of funds each school receives, and what strategies they implemented.

Direct Student Services: Section 1003A

SEAs have a new option to reserve up to 3% of their Title I, Part A allocation to award grants to LEAs to pay for direct student services.

The SEA can use up to 1% of the reserved funds for administering the grant program. The SEA must allocate the rest to geographically diverse LEAs, giving priority to LEAs that serve the highest percentage of schools identified for comprehensive or targeted support and improvement. Application requirements are specified in section 1003A(d).

LEAs that receive funds may use up to 1% for outreach and communication to parents, and up to 2% for administration. LEAs must use the rest of the grant to pay for direct student services such as academic courses not offered at the student’s school, credit recovery, Advanced Placement/college credit bearing classes, personalized learning, and in some cases public school choice transportation.

Program Delivery Changes that Affect Spending: Sections 1111, 1114 & 1115

ESSA clarifies that SEAs, LEAs, and schools can take diverse approaches to educational improvement to meet student needs and that Title I funds may be used on a broad array of activities. These policy and programmatic changes include:

- Section 1111(c): Accountability systems that incorporate various measures of school success, including student achievement, graduation rates, English proficiency, and at least one indicator of school quality or student success (such as student engagement or school climate),
- Section 1114(a)(1)(B): Giving more schools access to the schoolwide program model by permitting SEAs to waive the 40% poverty threshold normally required to operate a schoolwide program, after taking into account how a schoolwide program would best serve the needs of students in that school and improve academic achievement,
- Section 1114(b)(7): Expanding the strategies schoolwide program schools can use to address their needs, such as (but not limited to): counseling and mental health programs, mentoring services, access to advanced coursework, student behavioral supports, recruitment and retention activities for teachers, and
- Sections 1114(b)(7) & 1115(b)(2): Incorporating the concept of a well-rounded education into both the schoolwide and targeted assistance program models

Expenditure Reporting: Section 1111(h)

SEAs must annually report:

The per-pupil expenditures of federal, state, and local funds, including actual personnel expenditures and actual nonpersonnel expenditures of federal, state, and local funds, disaggregated by source of funds, for each local educational agency and each school in the state for the preceding fiscal year.

LEAs must also report this information annually for its spending and spending in each of its schools.

Optional Reservation for Public School Choice Transportation: Section 1111(d)(1)(D)

LEAs with schools identified for comprehensive support and improvement may, but are not required, to offer students in such schools the right to transfer to another non-identified school. If an LEA offers choice, it may reserve up to 5% of its Title I, Part A allocation to provide transportation.

LEA Reservation for Homeless, Neglected, and Delinquent Children: Section 1113(c)(3)

As with prior law, before distributing Title I allocations to schools, LEAs must reserve funds as necessary to provide services to homeless students and neglected students that do not attend Title I schools (and if appropriate, children in local institutions for delinquent children, and neglected and delinquent children in community day programs).

ESSA clarifies this reservation must be made based on the total Title I, Part A allocation, prior to any allowable expenditures or transfers by the LEA.

ESSA also clarifies LEAs may determine how much to reserve for homeless children based on a needs assessment (which can be the same needs assessment performed under McKinney-Vento), considering the number of homeless students in the LEA.

LEAs can spend the reserved funds for homeless students on services not ordinarily provided to other students including: 1) funding the homeless liaison, and 2) transportation services required under McKinney-Vento.

LEA Reservation for Early Childhood Education: Section 1113(c)(5)

LEAs may reserve funds to provide early childhood education programs for Title I eligible children. (Please note LEAs could spend Title I funds on preschool under NCLB, but ESSA makes the option more explicit.)

Ranking and Serving: Section 1113(a)

Ranking and serving is the process LEAs use to allocate Title I funds to eligible schools.

In general, ESSA maintains the prior law's ranking and serving rules, but there are two changes that could make it easier for high schools to access Title I funds.

The first change is to what is sometimes called the “75% rule.” LEAs must serve all schools with more than 75% poverty in strict rank order regardless of grade span. (LEAs may, if they choose, serve schools with 75% poverty or less by grade span – for example, serve elementary schools in order of poverty before serving middle or high schools.) LEAs can now lower the 75% threshold to 50% for high schools.

The second change affects how LEAs measure poverty in secondary schools. If a majority of secondary schools approve, LEAs can measure poverty in secondary schools based on the poverty levels of the elementary schools that feed into them. (Please note using feeder patterns to measure poverty was previously permitted by ED in its non-regulatory guidance, but ED did not require a majority of secondary schools to approve the measure’s use.)

Dual or Concurrent Enrollment Spending Options for Title I schools: Sections 1114(e) & 1115(f)

Secondary schools may use Title I funds for the costs of dual or concurrent enrollment programs including training teachers, tuition, fees, books and instructional materials, and transportation. (Please note that in a targeted assistance program services are limited to eligible students with the greatest need for special assistance.)

Parent and Family Engagement: Section 1116

As with prior law, LEAs receiving more than \$500,000 in Title I funds must reserve 1% of their allocation for parent and family engagement, but ESSA clarifies LEAs may reserve more than 1% if they choose.

LEAs must allocate 90% of the reserved funds to Title I schools, with priority to high-need schools. This is a change from prior law, which required the LEA to allocate 95% of the reserved funds.

The funds reserved for parental involvement must be used to carry out activities and strategies consistent with the LEA’s parental and family engagement policies, including at least one of the following:

- Supporting schools and nonprofit organizations in providing professional development on parent and family engagement strategies,
- Supporting programs that reach parents and family members at home, in the community, and at school,
- Disseminating information on best practices focused on parent and family engagement, especially the engagement of economically disadvantaged parents and family members,
- Collaborating, or providing subgrants to schools to enable them to collaborate, with organizations or employers with a record of success in improving and increasing parent and family engagement, or
- Engaging in any other activities and strategies the LEA determines are appropriate and consistent with its policy.

Equitable Services for Private School Students: Section 1117

As with prior law, LEAs must reserve some of their Title I, Part A funds to provide services to eligible students who attend private schools. ESSA requires LEAs to calculate the reservation based on the total amount of Title I, Part A funds received by the LEA, prior to any allowable expenditures or transfers.

LEAs can calculate the equitable share annually or every two years. Funds allocated to an LEA must be obligated in the same fiscal year they are received.

SEAs are required to:

- Notify “appropriate private school officials in the state” of the amounts LEAs have reserved for equitable services,
- Designate an ombudsman to oversee LEA compliance, and
- Provide services directly to private schools if the appropriate private school officials so request, and if they have demonstrated the LEA has not met equitable services requirements.

Supplement not Supplant: Section 1118(b)

As with prior law, SEAs, LEAs and schools must spend Title I funds to supplement and not supplant their state and local education spending. However, ESSA’s method for testing compliance with this requirement is different than prior law.

The U.S. Department of Education plans to regulate on Title I’s supplement not supplant requirement; therefore, more information will be forthcoming. But, in general, instead of looking at individual costs to determine if they are supplemental (as is currently done),¹ compliance will be tested by looking at the methodology the LEA uses to allocate state and local money to each Title I school. LEAs must show each Title I school receives all the state and local money it would receive if it were not a Title I school.

Please note this change applies to LEAs and Title I schools. It is not clear how compliance will be tested for SEA spending.

Local Maintenance of Effort: Sections 1118(a) and 8521

As previously required, LEAs must spend at least 90% of the state and local money they spent the prior year on providing a free public education to receive a full Title I allocation. This is known as “maintenance of effort” (MOE).

¹ Currently, supplement not supplant compliance is tested by asking a series of questions to determine whether an LEA or school would have paid for the activity if it did not get Title I money. The questions are: Was the state or district using Title I to pay for an activity it was required to do under state, local or other federal law? Was the state or district using Title I to pay for an activity it supported with state or local funds last year? Was the state or district using Title I to pay for an activity to support students who participated in the Title I program while at the same time using state or local money to pay for the same for non-Title I students? While a different, more flexible supplanting rule was supposed to be in place for schoolwide program schools, in practice this was not widely implemented. ED addressed confusion over the schoolwide program’s supplement not supplant requirement in July 2015 guidance: <http://www2.ed.gov/policy/elsec/guid/eseatitleiswguidance.pdf>.

ESSA provides some flexibility for when an SEA must reduce an LEA’s Title I allocation due to an MOE violation. An SEA must reduce an LEA’s Title I allocation if it fails to meet its MOE target if the LEA also failed to meet MOE at least once in the prior five years. (In other words, if the LEA met the MOE target in Years 1-5, but not in Year 6, the SEA would not reduce its allocation.) This is more flexibility than in the prior law, which required SEAs to reduce allocations each time an LEA failed MOE.

ESSA also permits a change in the LEA’s organizational structure to be grounds for ED to waive MOE.

State Maintenance of Effort (MOE) under Education Finance Incentive Grant (EFIG): Section 1125A(e)

As with prior law, states must spend at least 90% of the state money they spent the year before on providing a free public education to receive a full EFIG allocation (one of the four grants that make up Title I, Part A).

ESSA provides some flexibility for when ED must reduce an SEA’s Title I allocation due to an MOE violation. ED must reduce an SEA’s EFIG allocation if the SEA also failed MOE at least once in the prior five years. (In other words, if the LEA met the MOE target in Years 1-5, but not in Year 6, its allocation would not be reduced.) This is more flexibility than prior law, which required ED to reduce the EFIG allocation each time an SEA failed MOE.

ESSA also permits a change in the state’s organizational structure to be grounds for ED to waive MOE.

Title II, Part A

Title II Formula Grants to States: Section 2101(a)

ESSA changes the formula for distributing Title II, Part A funds among states.

As with prior law, there are two parts to the Title II formula:

- A “hold harmless” allocation that guarantees states at least as much money as they received in 2001 under three (no longer authorized) programs related to Title II,²
- An allocation based partly on a state’s number of 5-17 year olds (population levels) and partly on a state’s number of low-income 5-17 year olds (poverty levels).

ESSA gradually reduces the “hold harmless” amount between 2017 and 2022 until it is eventually eliminated.

ESSA also changes the amounts generated by population versus poverty. Now, states generate 35% based on population and 65% based on poverty. The percentages shift between 2018 and 2020 until it is 20% based on population and 80% based on poverty.

To see how this change is projected to affect state allocations, please see this report by CRS <https://assets.documentcloud.org/documents/2644885/ESEA-Title-II-a-State-Grants-Under-Pre.pdf>

² Eisenhower Professional Development, Class Size Reduction, and Staff Assistance.

State Uses of Funds: Section 2101(c)

Title II, Part A funds are distributed as follows:

- SEAs must subgrant 95% of the Title II, Part A allocation to LEAs.
 - Optional state reservation: From this 95%, SEAs may reserve not more than 3% for activities for principals or school leaders.
- SEAs may retain 5% of the Title II, Part A allocation. SEAs may use no more than 1% of the total Title II, Part A allocation for administration, and the remaining funds (4% if the entire 1% is used for administration) must be used for state activities.

Permissible state activities have expanded considerably and include: teacher certification reform, evaluation, equitable access to teachers, alternative routes for certification, recruitment and retention, establishing or expanding teacher or school leader academies, appropriate data use, professional development, and others.

Title II Subgrants to LEAs: Section 2102(a)

ESSA changes the formula for distributing Title II, Part A funds to school districts.

Under prior law, LEAs were guaranteed to receive at least as much as they received under certain other programs in 2001 under a “hold harmless” provision. (If an LEA did not exist in 2001, states had to make a series of complicated calculations to determine the LEA’s minimum Title II, Part A grant.)

ESSA eliminates the hold harmless in subgranting funds to LEAs. Now, LEAs generate funds based on their number of 5-17 year olds (20%) and their number of low-income 5-17 year olds (80%).

Local Uses of Title II, Part A Funds: Section 2103

ESSA expands, and updates, the list of activities LEAs can carry out with Title II funds. LEAs may carry out these activities through a grant or contract with a for-profit or nonprofit entity, or in partnership with an institution of higher education or tribal organization.

Of note are new “evidence based” requirements for using local Title II, Part A funds for class-size reduction and personalized professional development, as well as the role of the SEA in implementing this requirement. Specifically, LEAs can only spend Title II funds on class-size reduction to a “level that is evidence based.” Similarly “personalized professional development” (not all professional development) must be high-quality and “evidence based.” However, for both uses of funds, the evidence-based requirement *is to the extent the SEA, in consultation with LEAs, determines that such evidence is reasonably available.*

Reporting: Section 2104

States must report information about how they spend Title II funds, based in part on information collected from LEAs.

Title III, Part A

State Activities: Section 3111(b)

As with prior law, SEAs may reserve up to 5% of their Title III, Part A funds for state activities. Permissible state activities include (but are not limited to) establishing statewide entrance and exit procedures, teacher and principal preparation and professional development, planning, technical assistance, and recognition.

ESSA changes the amount SEAs may reserve for administration. Of the funds reserved for state activities, SEAs may use 50% or \$175,000, whichever is greater, for direct administrative expenses. Under prior law, SEAs could reserve 60% or \$175,000 for all administrative costs (direct or indirect).

Data for Determining State Allocations: Section 3111(c)(3)

As with prior law, ED awards Title III funds to states based on their number of English learners and immigrant children.

ESSA clarifies ED must determine a state's number of English learners using data from the American Community Survey conducted by the Department of Commerce, the number of students being assessed for English language proficiency under Title I's assessment provisions, or a combination of the two.

ED must determine a state's number of immigrant children through the American Community Survey.

Local Uses of Funds: Section 3115

Required uses of LEA funds are similar to the prior law, with some additions such as family/community engagement. Authorized uses of funds (that is uses that are permitted, but not required) are also similar with some expansion.

As with SEA administration, the LEA's 2% cap on local administration now only applies to direct administrative expenses.

Reporting: Section 3121

Eligible entities that receive subgrants must submit detailed reports every two years on information including activities conducted with Title III, how these activities supplemented state and local programs, and the performance data of children served. The eligible entity and SEA must use the report to improve Title III programs and activities.

Title IV, Part A

Student Support and Academic Enrichment Grants: Section 4101

ESSA created a new grant program in Title IV, Part A to:

- Provide all students access to a well-rounded education,
- Improve school conditions for student learning, and
- Improve the use of technology to improve the academic achievement and digital literacy of all students.

State Formula: Section 4103

Funds are distributed to states based on their relative share of Title I, Part A funds, with a guaranteed minimum for small states.

State Uses of Funds: Section 4104

SEAs must subgrant 95% of the Title IV, Part A allocation to LEAs

SEAs may retain 5% of the Title IV, Part A allocation. SEAs may use no more than 1% of the total Title IV, Part A allocation for administration, including reporting, and the remaining funds (4% if the entire 1% is used for administration) must be used for state activities.

Permissible state activities include:

- Monitoring, training, technical assistance, and capacity building for LEAs,
- Identifying and eliminating state barriers to the coordination and integration of programs, initiatives and funding streams that meet the program's purposes,
- Supporting LEAs in providing programs and activities that:
 - o Offer well-rounded educational experiences to all students including certain underrepresented groups,
 - o Foster safe, healthy, supportive, and drug-free environments that support student academic achievement, and
 - o Increase access to personalized, rigorous learning experiences supported by technology.

An SEA that receives funds in FY 2017 may also use state activities funds to pay for accelerated learning exams taken by low-income students in the 2016-2017 school year.

State Allocations to LEAs: Section 4105

LEA allocations are based on their relative share of Title I, Part A funds. LEAs can form consortia and combine their funds.

LEA Uses of Funds: Sections 4106(e)(2), 4107-4109

LEAs may reserve up to 2% for direct administrative costs.

LEAs that receive \$30,000 or more must use:

- At least 20% of their allocation on **activities to support well-rounded educational opportunities** such as (but not limited to) college and career guidance and counseling programs, music and arts programs, STEM subjects, accelerated learning, history, foreign language, environmental education, promoting volunteerism, and other activities to support a well-rounded education. (An LEA that receives funds in fiscal year 2017 may use funds to cover fees for accelerated learning examinations taken by low-income students in school year 2016-2017.)
- At least 20% of their allocation on **activities to support safe and healthy students** such as (but not limited to) drug and violence prevention, school-based mental health services, supporting a healthy, active lifestyle, preventing bullying and harassment, mentoring and school counseling, school dropout and reentry programs, and schoolwide positive behavioral interventions and supports.
- Some of their allocation on **activities to support the effective use of technology** such as providing school personnel with professional learning tools, building technological capacity and infrastructure, innovative strategies for delivering specialized or rigorous academic courses through the use of technology, blended learning projects, professional development in the use of technology in STEM subjects, and providing students in rural, remote, and underserved areas with resources to take advantage of high-quality digital learning experiences. Spending on purchasing technology infrastructure is limited to 15% of an LEA's Title IV, Part A allocation.

Supplement not Supplant: Section 4110

All Title IV, Part A funds are subject to a supplement not supplant requirement.

Title VIII

Definitions: Section 8101

ESSA changes and adds to the definitions section. Spending must be consistent with the requirements in these definitions.

State and Local Consolidated Administration: Sections 8201 and 8203

As with prior law, SEAs and LEAs may consolidate the administrative funds they reserve under ESSA programs to support various administrative, oversight, and technical assistance activities.

ESSA adds an allowable use of consolidated administrative funds – implementing fiscal support teams that provide technical fiscal support assistance, which includes evaluating fiscal, administrative, and staffing functions, as well as any other key operational functions. In addition, at the LEA level, LEAs may contribute state or local funds to expand the reach of fiscal support teams without violating the supplement not supplant requirements of any contributing program.

Equitable Services: Section 8501

As with prior law, LEAs must provide equitable services to eligible private school participants under:

- Title I, Part C (Migrant Education),
- Title II, Part A (Supporting Effective Instruction),
- Title III, Part A (Language Instruction for English learners and Immigrants),
- Title IV, Part A (Student Support and Academic Enrichment), and
- Title IV, Part B (21st Century Community Learning Centers).

Expenditures for eligible private school children must be equal, taking into account their number and educational needs, to the expenditures for participating public school children. Funds allocated to an LEA must be obligated in the same fiscal year they are received.

Equitable services under Title II, Part A has changed. Under prior law, LEAs only had to provide equitable services out of any Title II dollars they chose to spend on professional development. Under the new law, there is no specification that the amount spent on equitable services is tied to the amount spent on professional development.

As with Title I, the SEA now plays a larger oversight role – the ombudsman designated under Title I must monitor these programs as well, the SEA must notify private schools of the funds available for equitable services, and the SEA must provide direct services if private schools request (and if they demonstrate the LEA has not met requirements).

Maintenance of Effort (MOE): Section 8521

As previously required, LEAs must spend at least 90% of the state and local money they spent the prior year on providing a free public education to receive a full allocation under the programs covered by these General Provisions. This is known as “maintenance of effort” (MOE).

Consistent with the change to MOE in Title I, ESSA provides some flexibility for when an SEA must reduce an LEA’s allocation due to an MOE violation. An SEA must reduce an LEA’s I allocation if it fails to meet its MOE target if the LEA also failed to meet MOE at least once in the prior five years. (In other

words, if the LEA met the MOE target in Years 1-5, but not in Year 6, the SEA would not reduce its allocation.) This is more flexibility than in the prior law, which required SEAs to reduce allocations each time an LEA failed MOE.

Also consistent with MOE changes to Title I, a change in the LEA's organizational structure now qualifies as grounds for a waiver of the MOE requirement.

Prohibited Uses of Funds: Section 8526

ESSA now prohibits grant recipients from spending ESSA funds on the following activities unless specifically authorized in an ESSA program:

- School construction, renovation, or repair, or
- Transportation.

Funding Integration: A Sample from State Consolidated ESSA Plans

COORDINATION OF FEDERAL PROGRAMS

ESSA Requirements – Coordination here refers to how funding across multiple federal program areas, in combination with state and local funds, can be braided together to better support students.

The state plan must coordinate with other federal programs, including:

- >The Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.)
- >The Rehabilitation Act of 1973 (20 U.S.C. 701 et seq.)
- >The Carl D. Perkins Career and Technical Education Act of 2006 (20 U.S.C. 2301 et seq.)
- >The Workforce Innovation and Opportunity Act (29 U.S.C. 3101 et seq.)
- >The Head Start Act (42 U.S.C. 9831 et seq.)
- >The Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858 et seq.)
- >The Education Sciences Reform Act of 2002 (20 U.S.C. 9501 et seq.)
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ESSA calls for state plans to include assurances that the SEA will modify or eliminate state fiscal and accounting barriers so that the schools can easily consolidate funds from other federal, state and local sources to improve educational opportunities and reduce unnecessary fiscal and accounting requirements.

From the Oklahoma Department of Education Plan –

<http://sde.ok.gov/sde/sites/ok.gov.sde/files/ESSAStatePlanDraft1-update112116.pdf>

State Level Strategies

Braided funding - It is the OSDE's vision to partner with all programs in relationship with the ESSA to foster collaboration and coordination - including within the OSDE and outside agencies - to braid funding to educate the whole child from preK-20. The agency has created a committee with representatives from the Oklahoma Department of Rehabilitation Services, Department of Health, Department of Mental Health and Substance Abuse Services, Department of Career and Technology Education and the Oklahoma Office of Workforce Development to identify the funding streams that can be used in collaboration for guiding and educating students to become productive within the Oklahoma workforce. Members of this team, through the Governor's Oklahoma Works Initiative, have undertaken extensive asset mapping - an inventory of all federal, state and private funding streams that support state workforce efforts, including education - to better align the efforts of each agency. If funding streams are effectively braided, they can be leveraged for greater impact.

School-wide programs - According to the USDE, a Title I schoolwide program is a comprehensive reform strategy to upgrade the entire educational program in a Title I school in order to improve the achievement of the lowest-achieving students through consolidating federal, state and local education funds to benefit all students. A Title I school with 40% or more of its students living in poverty is eligible to implement a schoolwide program.

Over the past two years, the OSDE has offered workshops and professional development opportunities to encourage districts to take advantage of Title I's schoolwide provisions to allow more flexibility with funding. The agency provides a tutorial webinar and onsite training throughout the year for schools that wish to adopt a schoolwide funding strategy.

Cross-functional Teams - The OSDE has many opportunities to capitalize on the flexibility awarded under the ESSA to maximize capacity for serving districts. The OSDE has begun working cross-functionally within the agency to address the needs of Oklahoma students more holistically. Oklahoma's low socioeconomic students often are special education students and possibly EL students as well, and these students typically are in the lowest-performing schools. Under the ESSA, Oklahoma hopes to create a system of support for districts and students that will improve overall academic achievement.

More specifically, the OSDE is developing a system of cross-programmatic collaboration led by the OSDE School Support division to address the needs of low performing schools through combining state and federal funds. To better support schools and students with multiple challenges, the OSDE will utilize teams with representation from the departments of school improvement, special education, ELL/Title III, finance, federal programs, educator effectiveness and instruction/curriculum to serve as a support system for struggling schools. An equipped team of those from various federal programs will provide support through intervention resources, guidance and onsite visits.

Leadership Training - The OSDE has recently implemented a rigorous, year-long leadership development for principals. Titled Lead to Succeed (L2S), it uses curriculum designed by the National Institute for School Leadership to help participants improve areas from instruction to community engagement at their schools. Principals in L2S will reflect on their own schools and utilize new strategies as they continue their professional development. A new potential strategy Oklahoma has identified is to leverage L2S for those principals in schools identified for comprehensive support and improvement (CSI), braiding state resources and federal school improvement funds with the goal of quickly producing student gains through increasing leadership capacity at the school site level.



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ESSA State Plan: Recommendation Form

Development Cycle No: 2	Decision Point No(s): 19	Author: Mary Mulloy, Jennifer Gresham, Patrick Halladay
Date submitted: 20 July 2016		Bounce Team Coordinating: CFP
ESSA Citation: 8305(b)		ESSA Page Number: 441 Link to ESSA
Question(s) being considered: Do we want LEAs to use a consolidated application for formula grants through a web-based platform?		
What ESSA requirements need to be met?: Preferred as a way for LEAs to use funds in a braided fashion		
Solution being proposed:		
<ul style="list-style-type: none"> • Formula grants will be consolidated in a single web-based platform application for all LEAs 		
Rationale: Explain why your proposal supports each decision logic element below:		
<i>Equity:</i>		
<ul style="list-style-type: none"> • An LEA has the ability to see all funds available to meet their goals. 		
<i>Alignment with current VT policy and practice:</i>		
<ul style="list-style-type: none"> • LEAs are already consolidating formula funds through a web-based platform, so this recommendation would be a continuation of current practice. 		
<i>Efficiency (streamlining processes, eliminating duplicative systems or requirements):</i>		
<ul style="list-style-type: none"> • Consolidation of funds allows for expedited granting for LEAs and meets federal fiscal and program requirements. 		
<i>Possibility (implementation feasibility for the AOE and impacted stakeholders):</i>		
<ul style="list-style-type: none"> • Consolidation of formula funds through a web-based platform is straight-forward. The AOE and the field both have familiarity with and knowledge of the platform. 		
Identify any known or potential risks associated with your proposed solution:		
<ul style="list-style-type: none"> • Known: None • Potential: If there was a change in platform away from our current web-based platform, this could lead to a large learning curve for the LEAs and the AOE. 		
What are the expected benefits associated with your proposed solution:		
<ul style="list-style-type: none"> • A separate web-based platform application will also be used for competitive grants, allowing for a common format for both. • With all formula funds in one application, it is easy for LEAs to braid funds to achieve LEA and school goals. • All formula grants would be consolidated in one place facilitating ease of review and tracking of expenditures. 		
Secretary's Decision		Date: 7/22/16 Initials:
<input checked="" type="checkbox"/> Confirm recommendation of ESSA State Plan Management Team <input type="checkbox"/> Reject recommendation of ESSA State Plan Management Team and offer the following as an alternative:		

<http://education.vermont.gov/sites/aoe/files/documents/edu-essa-state-plan-recommendation-point-19.pdf>

From the Illinois Plan – <http://isbe.net/essa/pdf/ESSA-Illinois-State-Plan-draft-2.pdf>

Legislation (PA 97-0558) was signed into law in 2011 directly addressing the duplications and redundancies within other government agencies and that can be a model for ISBE to consider as it contemplates the most appropriate ways to braid funding. Illinois has been utilizing horizontal collaboration across state agencies (facilitated within the Illinois Children’s Cabinet structure) as well as cross divisional work within ISBE to identify duplicative approaches and/or barriers to implementation of effective and efficient programming for Illinois’ children and families.

ESSA provides the ideal opportunity for ISBE to coordinate the funding and administration between different federal programs. In the development of the state plan, for instance, the braiding between IDEA Parts B and D and Federal Statewide Systems of Support dollars has provided for the development and funding of its statewide multi-tiered system of support (IL-EMPOWER). So, too, the development of the ESSA plan has supported collaboration with the Carl D. Perkins Career and Technical Education Act of 2006 and Career and Technical Education through the development and implementation of career pathways for students in order for them to leave high school college and career ready.

...

G. Other state identified strategies;

The purpose of Title I in ESSA is to provide all children a significant opportunity to receive a fair, equitable, and high quality education and to close educational achievement gaps. The expanded focus in the Statement of Purpose supports ISBE’s position that all children need access to an equitable, high quality, well rounded education to be successful. This expanded focus reaches beyond English language arts and mathematics foci of No Child Left Behind to help provide a better chance of closing the achievement gap. ISBE looks forward to working internally and with our districts to support educational decisions that are well-grounded and well-considered to support this goal.

ISBE is expected to receive more than \$1 billion in Title I, Part A; Title II; and Title IV, Part A funds to distribute to its 852 districts. To facilitate this process, the Title Grants Administration Division within ISBE is in the process of updating its consolidated application to house Title I Part A; Title II; and Title IV, Part A programs. This will allow districts to use one portal to provide programmatic and fiscal information related to these grants in order to ensure that the academic and non academic needs of all students, including each unique subgroup, are considered.

...

In accordance with Section 5103, an LEA may transfer all or a lesser amount of the funds from Title II, Part A and Title IV, Part A into Title I, Part A. Further, school districts and schools should evaluate the ways in which federal formula grant programs such as Title I, Title II, Title III, IDEA, and Perkins can work together to support their educational goals. It is challenging to think about using federal grants beyond the traditional limited ways to explore new ways that may make a substantial difference in student achievement.

H. Each SEA must describe how it will use Title IV, Part A and Part B and other federal funds.

Title IV, Part A funds are to improve students’ academic achievement by increasing the capacity of states, LEAs, schools, and local communities to

- i. Provide all students with access to a well rounded education;
- ii Improve school conditions for student learning; and
- iii Improve the use of technology in order to improve the academic achievement and digital literacy of all students.

ISBE will use Title IV, Part A funds (Student Support and Academic Enrichment Grants) to coordinate with LEAs to reduce exclusionary discipline, implement evidence based mental health awareness training programs, and expand access for school based counseling and behavioral health programs. Programs can include school-based behavioral health services that are trauma-

informed; prevent bullying and harassment; develop relationship building skills; and train staff on trauma, classroom management, and child sexual abuse and prevention. ISBE also encourages LEAs to take advantage of the Approaches to Literacy Grants available to districts.

State Use of Funds

ISBE shall use funds under this part to provide technical assistance and capacity building to districts to meet the goals of this program. ISBE will work to support districts in providing programs and activities that (1) offer well rounded educational experiences to all students; (2) foster safe, healthy, supportive environments with adequate school resources (such as enough counselors, social workers, special education personnel) to address high level needs such as deep poverty, homelessness, community violence, and trauma, and drug-free environments that support student academic achievement; and (3) increase access to personalized, rigorous learning experiences supported by technology.

As with Titles I and Title II currently, ISBE will consider what resources and programs across the state are presently in place and available, and it will seek to maximize effective use of Title IV, Part A funds by

- Coordinating new plans and resources available under this subpart with such preexisting resources and programs,
- Monitoring the implementation of Title IV, Part A activities and programs through its existing district oversight mechanisms,
- Offering technical assistance to districts to help them in implementing approved program activities, and
- Identifying the appropriate division to provide equitable access for all students to the activities supported under Title IV, Part A, including aligning those activities with the requirements of other federal laws.
- ISBE is investigating supporting the priorities under Title IV, Part A through various initiatives including, but not limited to, supporting district/fine arts organizations partnerships, promoting healthy choices in schools, and ensuring equitable access to AP/IB and CTE coursework.

(ISBE requests ideas from individuals or groups regarding how funding streams can be combined in order to support each and every child as she or he progresses through school.)

From the Louisiana Plan – <http://www.louisianabelieves.com/docs/default-source/louisiana-believes/essa-framework.pdf?sfvrsn=8>

In order to achieve strong results in this shared, statewide framework, schools and districts will not only set goals but also annually submit plans for spending federal funds on academic strategies. Most federal dollars flow directly through the state to schools and school systems. Throughout this document, therefore, sections related to district plans call on school systems to use funds from Title I, Title II, Title III, and Title IV in order to achieve both leading and long-term indicators of success.

A small amount of federal funding must be or can be “set aside” by the state. Throughout this document, you will also review actions the state will take to support local school systems. These state activities will largely be funded by “set-aside dollars.” Thus the success of Louisiana’s plan is largely based not only on the ambition of its goals, but also on the extent to which the spending plans created by the state, schools, and school districts represent a true attempt at systemic change.

Examples of Effort Prior to ESSA

See Attached

- *Funding Stream Integration to Promote Development and Sustainability of a Comprehensive System of Learning Supports* – from Louisiana

For the *Georgia Department of Education Integration and Use of Federal Funds Manual*, go to:
[https://www.gadoe.org/Curriculum-Instruction-and-Assessment/Curriculum-and-Instruction/Documents/ESOL/June%2014%202013%20Integration%20and%20Use%20of%20Federal%20Funds%20Manual%20\(3\).pdf](https://www.gadoe.org/Curriculum-Instruction-and-Assessment/Curriculum-and-Instruction/Documents/ESOL/June%2014%202013%20Integration%20and%20Use%20of%20Federal%20Funds%20Manual%20(3).pdf)

Funding Stream Integration to Promote Development and Sustainability of a Comprehensive System of Learning Supports

The Louisiana Department of Education is one of the states pioneering development of a comprehensive system of learning supports that transforms its approach to providing student and learning supports. As Paul Pastorek, the former state superintendent of Education, stressed

If we really want to eliminate the achievement gap, we must also ask schools to develop comprehensive plans to address the [many] needs of our students. ... Most of our schools have resources in place, but we need to reorganize those resources to proactively meet the needs of the entire student body....

Under Pastorek, reorganization of student and learning supports began with the development of a design for a comprehensive, multifaceted, and cohesive approach to addressing barriers to teaching and learning and re-engaging disconnected students. The design was intended to (1) unify the various interventions fragments and (2) end the marginalization of student and learning supports by (a) moving school improvement policy and practice from a two- to a three component approach and (b) designating implications for reworking the operational infrastructure at schools, districts, regional units, and the state department. See the design at <http://smhp.psych.ucla.edu/summit2002/brochure.pdf>.

Moving student and learning supports out of a marginalized and fragmented status in school improvement policy and practice always has required integrating and redeploying existing resources. Education funding cutbacks are making such efforts even more pressing. With this in mind, the Louisiana Department of Education developed a manual and tools to assist local education agencies in understanding how to integrate multiple funding sources to accomplish efforts such as the development of the state's design for a Comprehensive Learning Supports System (<https://www.yumpu.com/en/document/view/40892309/tools-for-integrating-education-funds-louisiana-department-of->)

An introduction to the work states:

With each year's budget projections getting smaller and smaller, we are forced to think of more efficient ways to do business. We know the tremendous responsibility we have to do the right thing for our children. ... and we have to make tough choices - and make them now. ... Leadership is the key in integrating educational funds to achieve the sustainability of "system change" for improved student outcomes. We must put aside our "turfs" and our "purse-strings," in order to overcome the challenges that dwindling resources present for school improvement planning. It is critical for all leaders at the district level to support this effort, in order to empower all personnel to collaborate in new and effective ways. Leaders must remain engaged in this new way of planning and allow personnel the flexibility to think outside of the box to transform the way we do business. ... Managing change is difficult and to be successful, we have to meet the needs of all children, regardless of the ways we choose to fund programs. Far too often, in our silos we have said, "No, we can't do that because..," rather than working together to eliminate the silos. We are [too] comfortable with the inflexibility we have created.

In the documents to guide local education agencies, the department presents templates related to various promising initiatives for meeting the state priority goals for education. The emphasis is in clarifying ways that federal, state, and local funding sources can work together to implement and sustain the initiatives effectively. The templates offer a framework for district/school review of current and future planning for improving integration of resources.

The template related to a Comprehensive Learning Supports System is on the next two pages.

Note: The center at UCLA is co-directed by Howard Adelman and Linda Taylor and operates under the auspices of the School Mental Health Project, Dept. of Psychology, UCLA, Los Angeles, CA 90095-1563 Phone: (310) 825-3634. Email: smhp@ucla.edu.

Comprehensive Learning Supports System (CLSS)

LDOE Critical Goals: 1, 2, 3, 4, 5, 6

Purpose To ensure all students have opportunity to succeed at school by aligning and redeploying resources to develop a comprehensive system of learning that addresses students' academic, emotional, physical, and social needs.

Possible Funding Sources Title I, II, III, IV, VI, X, School Improvement, MFP, IDEA.

Targeted Population Students with physical, social, or emotional barriers to learning.

Detail how this LDOE initiative supports academic achievement Students learn best when their academic, emotional, physical, and social needs are met. By addressing all of these needs, we are educating the whole child and ensuring that he/she is healthy, safe, engaged, supported, and challenged. Anticipated outcomes are (1) increased graduation rates and reduced student dropout rates; (2) re-engaged students; (3) reduced number of low-performing schools; (4) narrowing of the achievement gap; and (5) countering of student achievement plateau effect.

PROGRAM/ACTIVITY: Implement a fully developed Comprehensive Learning Supports System

PROGRAM/ACTIVITY DESCRIPTION: The Comprehensive Learning Supports System is a comprehensive and systemic approach to ensuring all students have equal opportunity to succeed at school. Learning Supports are the resources strategies and practices that provide physical, social, and emotional support to directly address barriers to learning and teaching and to re-engage disconnected students.

ACTIVITIES NEEDED FOR PROGRAM DEVELOPMENT/IMPLEMENTATION/EVALUATION:

Personnel

» District CLSS Facilitator - directs, guides, and facilitates the development of a cohesive and coherent district-wide support with the intent of addressing barriers to learning and teaching and reengaging disconnected students.

Professional Development

» Job Embedded professional development to model appropriate learning supports strategies to improve student academic achievement.
» Stipend and Substitute allowances for teacher and support staff participation in professional development.

Travel

» In-state - travel to schools by facilitators to improve student achievement by providing technical assistance and job-embedded professional development. Travel to other districts to view model schools and to attend state-level training.
» Out of state - Travel to conferences that focus on strategies to implement a comprehensive system of learning supports designed to improve student achievement by eliminating barriers to learning and teaching and providing equal opportunity for all students.

Materials/Supplies

» Supplies to facilitate professional development activities.

Other

» None.

RESEARCH: The work of Drs. Howard Adelman and Linda Taylor through the UCLA School Mental Health Project, (<http://smhp.psych.ucla.edu/>) indicates the need for developing a comprehensive, multifaceted, and cohesive system of learning supports. There are many barriers that interfere with ensuring all students have an equal opportunity to succeed at school. A comprehensive learning supports system is essential to ensuring higher academic achievement, closing the achievement gap, and preparing students to be effective citizens in a global market. The research-base for initiatives to pursue a comprehensive focus on addressing barriers indicates the value of a range of activity that can enable students to learn and teachers to teach. The findings also underscore that addressing major psychosocial problems one at a time is unwise because the problems are interrelated and require multifaceted and cohesive solutions. In all, the literature supports the need for new directions, offers content for learning supports, and stresses the importance of integrating such activity into a comprehensive, multifaceted approach.

COMPREHENSIVE LEARNING SUPPORTS SYSTEM (CLSS)

State Initiatives		No Child Left Behind									Perkins	Individuals With Disabilities Education Act		
		Title I			Title II		Title III	Title IV	Title VI	Title X		Part B	Early Intervening	Preschool
Budget Code	Activity	Part A		Part C	A: Teacher Quality	D: Tech	LEP	B	B: REAP-RLIS	McKinney-Vento				
			1003A	1003G							Migrant			
100	Salaries													
	CLSS Leader: to support existing or new employee	X	X	X		X				X				
	Stipends - Teacher PD	X	X	X	X	X		X		X			X	
	Sub Pay Teacher CLSS PD	X	X	X	X	X		X		X			X	
200	Employee Benefits													
		X	X	X	X	X		X		X			X	
300	Purchased Professional /Tech SVC													
	Capacity Building PD: Admin/teach	X	X	X	X	X		X		X			X	
	Capacity Building: PA and Support*	X	X	X	X			X		X			X	
400	Purchased Property Services													
500	Other Purchased Services													
	Travel -In State	X	X	X	X	X		X		X			X	
	Travel-Out of State	X	X	X	X	X		X		X			X	
600	Supplies (Less Than \$5,000)													
	PD Materials/Supplies	X	X	X	X	X		X		X			X	
	Outreach Materials/Supplies	X	X	X	X			X		X			X	
700	Property (Greater Than \$5,000)													
800	Other Objects													

*School Psych/SW/S Counselors

For the entire document on Louisiana's Tools for Integrating Education Funds, see <https://www.yumpu.com/en/document/view/40892309/tools-for-integrating-education-funds-louisiana-department-of->).