

# **Federal Programs Handbook**

**2021 - 2022**



**Disclaimer:** *The contents of this handbook are currently under revision by the Alabama State Department of Education. This handbook is subject to change at any time given updates in federal or state legislation or guidance. LEAs are responsible for local program implementation. Any questions not addressed in the handbook should be directed to an assigned Alabama Department of Education (ALSDE) federal programs education specialist.*

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## Federal Programs Overview

The *Elementary and Secondary Act of 1965*, as amended by *Every Student Succeeds Act of 2015*, requires State Educational Agencies (SEAs) to monitor the implementation of program requirements and the expenditure of federal funds.

The Alabama State Department of Education Federal Programs Office conducts monitoring at the local educational agencies (LEAs) to ensure compliance with regulations as well as to assure that the quality of the program and instructional delivery is of high standards. Additionally, monitoring emphasizes accountability for using federal resources.

Our goal as a Department is to administer all federally funded education programs by providing technical assistance to LEAs, approving applications for funding, and monitoring for compliance with federal statutes and regulations.

## 2021-2022 Monitoring Schedule

| Monitoring Review Dates           | County System/City System/Charter School Name |
|-----------------------------------|---|
| September 13 – September 17, 2021 | Attalla City                                  |
| September 20 – September 24, 2021 | LEAD Academy                                  |
| September 20 – September 24, 2021 | Life Academy (TA)                             |
| September 27 – October 1, 2021    | Legacy Prep                                   |
| September 27 – October 1, 2021    | Breakthrough Charter (TA)                     |
| October 4 – October 8, 2021       | Baldwin County                                |
| October 18 – October 22, 2021     | Magic City Acceptance Academy (TA)            |
| October 25 – October 29, 2021     | Cullman County                                |
| November 8 – November 12, 2021    | Oneonta City                                  |
| November 15 – November 19, 2021   | Selma City                                    |
| November 29 – December 4, 2021    | Chilton County                                |
| December 6 – December 10, 2021    | Lauderdale County                             |
| December 13 – December 17, 2021   | Oxford City                                   |
| January 4 – January 7, 2022       | Hale County                                   |
| January 10 – January 14, 2022     | Dothan City                                   |
| January 18 – January 21, 2022     | Russell County                                |
| January 24 – January 28, 2022     | Montgomery County                             |
| January 24 – January 28, 2022     | Davis Elementary (TA)                         |
| February 7 – February 11, 2022    | Blount County                                 |
| February 14 – February 18, 2022   | Colbert County                                |
| February 22 – February 25, 2022   | Talladega City                                |
| February 28 – March 4, 2022       | Pelham City                                   |
| March 7 – March 11, 2022          | Jefferson County                              |
| March 14 – March 18, 2022         | Bessemer City                                 |
| March 21 – March 25, 2022         | Franklin County                               |
| March 28 – April 1, 2022          | Madison County                                |
| April 4 – April 8, 2022           | Linden City                                   |
| April 11 – April 15, 2022         | Elba City                                     |
| April 11 – April 15, 2022         | Coffee County                                 |
| April 18 – April 22, 2022         | Sumter County                                 |
| April 26 – April 29, 2022         | Pike Road City                                |
| May 9 – May 13, 2022              | Opp City                                      |
| May 9 – May 13, 2022              | Covington County                              |
| May 16 – May 20, 2022             | i3 Academy                                    |



# Federal Programs Department Directory

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|---|--|---|--|---|---|---|
| Colbert County<br>Franklin County<br>Haleyville City<br>Jasper City<br>Marion County<br>Muscle Shoals City<br>Russellville City<br>Sheffield City<br>Tuscumbia City<br>Walker County<br>Winfield City<br>Winston County | ACCEL Academy<br>Break Through Academy<br>I3 Academy<br>LEAD Academy<br>Legacy Prep<br>Life Academy<br>Magic City Academy<br>University Charter School                         | Albertville City<br>Arab City<br>Boaz City<br>DeKalb County<br>Fort Payne City<br>Guntersville City<br>Huntsville City<br>Jackson County<br>Madison City<br>Madison County<br>Marshall County<br>Scottsboro City    | Choctaw County<br>Demopolis City<br>Fayette County<br>Greene County<br>Hale County<br>Lamar County<br>Linden City<br>Marengo County<br>Pickens County<br>Sumter County<br>Tuscaloosa City<br>Tuscaloosa County | Alabaster City<br>Birmingham City<br>Blount County<br>Fairfield City<br>Homewood City<br>Jefferson County<br>Leeds City<br>Midfield City<br>Trussville City<br>Mountain Brook City<br>Vestavia Hills City | Aniston City<br>Attalla City<br>Calhoun County<br>Cherokee County<br>Clay County<br>Etowah County<br>Gadsden City<br>Jacksonville City<br>Oxford City<br>Piedmont City<br>Randolph County<br>Roanoke City | Alexander City<br>Bibb County<br>Chilton County<br>Coosa County<br>Hoover City<br>Pelham City<br>Shelby County<br>Sylacauga City<br>Talladega City<br>Talladega County<br>Tallapoosa County |
| <b>Stacy Williams<br/>Team 8</b>  | <b>Sally Meek<br/>Team 9</b>   | <b>Sherlisa Barnes<br/>Team 10</b>  | <b>Aleysia Alves<br/>Team 11</b>   | <b>Camille Finley<br/>Team 12</b>   | <b>Jennifer Connell<br/>Team 13</b>   |   |
| Autauga County<br>Butler County<br>Dallas County<br>Elmore County<br>Lowndes County<br>Montgomery County<br>Perry County<br>Pike Road City<br>Selma City<br>Tallassee City<br>Wilcox County                             | Auburn City<br>Barbour County<br>Bullock County<br>Chambers County<br>Dale County<br>Eufaula City<br>Lanett City<br>Lee County<br>Opelika City<br>Ozark City<br>Russell County | Baldwin County<br>Brewton City<br>Chickasaw City<br>Clarke County<br>Conecuh County<br>Gulf Shores City<br>Mobile County<br>Monroe County<br>Saraland City<br>Satsuma City<br>Thomasville City<br>Washington County | Andalusia City<br>Cleburne County<br>Coffee County<br>Daleville City<br>Dothan City<br>Enterprise City<br>Geneva City<br>Geneva County<br>Henry County<br>Houston County<br>Pike County<br>Troy City           | Bessemer City<br>Crenshaw County<br>Covington County<br>Elba City<br>Escambia County<br>Macon County<br>Opp City<br>Pell City<br>Phenix City<br>St. Clair City<br>Tarrant City                            | Athens City<br>Cullman City<br>Cullman County<br>Decatur City<br>Florence City<br>Hartselle City<br>Lauderdale County<br>Lawrence County<br>Limestone County<br>Morgan County<br>Oneonta City             |   |

# SECTION 1:

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## Alabama Continuous Improvement Plan (ACIP)

### Overview

ESSA requires that an eligible school operating a schoolwide or targeted assistance program must develop a comprehensive plan that is designed with the involvement of teachers, principals, parents, etc. The plan is developed around a comprehensive needs assessment.

The plan should be implemented, regularly monitored, and revised as necessary. The plan is based on students' needs to ensure that students are provided opportunities to meet the challenging State academic standards. All school-level plans will be created and/or developed in the electronic system named eProve. Chart 1.1 (see next page) provides guidance on the required ACIP components. Districts do not have to complete an ACIP in eProve.

### Assurances

All LEAs and local schools are required to complete assurances each school year. The LEA will complete assurances in the Electronic Grant Application (eGAP) in the LEA Superintendent Assurances Confirmation section. The LEA can reach this using the following path once they are signed into eGAP: Home → Funding Applications → Consolidated → Supplemental Information → LEA Superintendent Assurances Confirmation. The local school will complete assurances in eProve. For additional assistance in finding or signing-off on assurances at both the LEA and local school levels, please contact the Federal Programs Office.

### Process

The federal programs coordinator or central office designee should ensure that all components of the ACIP are complete, including the applicable Schoolwide and Targeted Assistance Diagnostics, which are found in eProve Diagnostics and the school plan which is located in eProve Strategies.

- eProve Website: <https://myjourney.advanc-ed.org/login>

The Central Office must provide feedback to the schools before approving the schools' ACIPs. Final approval from the central office can be done verbally or in writing to the schools. ALSDE Office of School Improvement may have additional ACIP requirements for schools in Comprehensive Support and Improvement (CSI) or Targeted Support and Improvement (TSI) status.

The plans should be monitored and evaluated throughout the year. It is a working document that can be adjusted as needed. Schools should complete a thorough evaluation at the end of the year.

- Starting the Process:
  - **Have a strong ACIP Committee/Leadership Team in Place**
    - **ACIP** committee must include:
      - Teachers
      - Principals
      - Administrators
      - Other appropriate school staff
      - Students (secondary school)
      - Parents
      - Other appropriate Community Members

Schools are not required to “submit” their plans to Federal Programs for approval. Federal Programs can view the plans at any time by logging into the eProve platform. CSI schools will have a different procedure for submitting their plans to the Office of School Improvement. As a reminder, schools must include **any** federal dollars that are being spent in their yearly plan. Funding should connect to an objective, critical initiative, or activity within the plan.

## Additional Resources




Chart 1.1: ACIP Checklists

| Title I Schools ACIP Checklist   | Non-Title Schools ACIP Checklist                            |
|--|---|
| _____ Administer Title I Parent Surveys (Spring or Fall)                             | _____ Administer Parent Surveys (Spring or Fall)            |
| _____ Administer Staff and Student Surveys (Spring or Fall)                          | _____ Administer Staff and Student Surveys (Spring or Fall) |
| _____ Complete the applicable Title I Diagnostic (Schoolwide or Targeted Assistance) | _____ Complete plan in eProve Strategies                    |
| _____ Complete plan in eProve Strategies   |   |

Chart 1.2: Additional Website Resources

- [https://padlet.com/andrel\\_harrison1970/StrategicThinkingResourcesAlabamaSchools](https://padlet.com/andrel_harrison1970/StrategicThinkingResourcesAlabamaSchools)
- <https://alsde.onlinehelp.cognia.org/>
- <https://extranet.cognia.org/extranet> (use eProve password and username to log-in)

Chart 1.3: Guidance on required ACIP Components

|  eProve surveys<br><a href="#">Go to surveys</a>   |  eProve diagnostics<br><a href="#">Go to diagnostics</a>  |  eProve strategies<br><a href="#">Go to strategies</a>  |
|---|--|--|
| <p><b>Data from survey results assist with developing a school's needs assessment.</b></p>  | <p><b>The Title I Diagnostic can be found under the ALSDE Content Tab in eProve Diagnostics. The Title I Diagnostic is for Title I Schools ONLY.</b></p>                             | <p><b>Both Title I and Non-Title Schools and must complete an ACIP in eProve Strategies.</b></p>   |
| <p><b>Parent Surveys</b></p> <ul style="list-style-type: none"> <li>Title I Schools must use the <b>required</b> Title I Parent Survey that can be found under the ALSDE Content Tab in both English and Spanish</li> <li>Non-Title Schools may use any parent survey/inventory found under the AdvancED/Cognia Certified Content Tab or utilize another survey of their choice.</li> </ul> | <p><b>Title I Schools Only</b></p> <ul style="list-style-type: none"> <li>Schoolwide <b>or</b> Targeted Assistance Title I Comprehensive Needs Assessment</li> </ul>                 | <p><b>Title I Schools and Non-Title Schools</b></p> <ul style="list-style-type: none"> <li>This is an annual plan that contains strategic themes, objectives, critical initiatives, activities, financial resources, etc.</li> </ul> |
| <p><b>Teacher Surveys or Inventories</b><br/><b>Title I Schools and Non-Title Schools</b></p> <ul style="list-style-type: none"> <li>Schools may use <b>any</b> teacher survey/inventory found under the AdvancED/Cognia Certified Content Tab or utilize another survey of their choice.</li> </ul>  | <p><b>Title I Schools Only</b></p> <ul style="list-style-type: none"> <li>Schoolwide <b>or</b> Targeted Assistance Title I ACIP Assurances</li> </ul>                                | <p><b>Title I Schools and Non-Title Schools</b></p> <ul style="list-style-type: none"> <li>The <i>Annual Implementation Plan</i> within eProve Strategies will function as your school's yearly ACIP.</li> </ul>                     |
| <p><b>Student Surveys or Inventories</b><br/><b>Title I Schools and Non-Title Schools</b></p> <ul style="list-style-type: none"> <li>Schools may use <b>any</b> student survey/inventory found under the AdvancED/Cognia Certified Content Tab or utilize another survey of their choice.</li> </ul>  | <p><b>Title I Schools Only</b></p> <ul style="list-style-type: none"> <li>Schoolwide <b>or</b> Targeted Assistance Title I Parent and Family Engagement Plan</li> </ul>              | <p><b>Title I Schools and Non-Title Schools</b></p> <ul style="list-style-type: none"> <li>If a Title I School, be sure to include all federal dollars used in the financial resources section of the plan.</li> </ul>               |
|   | <p><b>Title I Schools Only</b></p> <ul style="list-style-type: none"> <li>Schoolwide <b>or</b> Targeted Assistance Title I Coordination of Resources-Comprehensive Budget</li> </ul> |  |

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# SECTION 2:

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## eGAP Consolidated Application

### Overview

Welcome to e-GAP – Alabama State Department of Education’s **E**lectronic **G**rant **A**pplication **P**rocess! The Federal Programs Consolidated Application, as well as the funding applications for Career Technical Education, Safe Schools, Special Education, and Technology Initiatives, will be included within e-GAP. The e-GAP system allows LEAs to submit Applications, develop plans, request funding, and provide expenditure reports over the Internet. Additional capabilities include online application submission and approval, application status tracking, automatic e-mail notifications, and all necessary fiscal processing.

### Assurances

All LEAs and local schools are required to complete assurances each school year. The LEA will complete assurances in eGAP in the LEA Superintendent Assurances Confirmation section. The LEA can reach this using the following path once they are signed into eGAP: Home → Funding Applications → Consolidated → Supplemental Information → LEA Superintendent Assurances Confirmation. The local school will complete assurances in eProve. For additional assistance in finding or signing-off on assurances at both the LEA and local school levels, please contact the Federal Programs Office.

### Process

#### **Electronic Resources**

eGAP is built on the latest features found in modern browsers. Use the most recent version of one of the browsers found below for the optimal experience in eGAP:

- Microsoft Edge
- Mozilla Firefox
- Safari
- Google Chrome

eGAP uses Adobe Acrobat Reader to generate system pages in a printable format. Please visit [Adobe Acrobat Reader Download Homepage](#) for the download and installation instructions.

## Password Information

**Logging on** to the eGAP site **requires a password**. Initially, only the Superintendent and Chief Financial Officer will be given administrator rights to eGAP. The Program Coordinators will be given **user rights**. The Superintendent will decide who will have additional access to the site and will assign “**roles**” for each user.

New Superintendents to school systems must be set up by LEA Accounting. Required information includes email addresses, phone numbers, and roles required to set up users. The Superintendent will be provided with separate directions about the process of logging on to the site for the first time, obtaining his/her own password, and assigning roles for selected users.

## Logging On to the System

1. To log-on to the site, open the internet browser and use the following address:  
<http://egrant.alsde.edu/Default.aspx>
2. **On the Home Page**, you will notice a menu on the left side of the page. This menu will change and include additional items as you move through the application process. It is essential to establish the habit of using the menu or other “buttons” within the page to navigate between pages.

**NOTE:** The “Back” arrow at the top of the page may **not** take you where you want to go because of security features within the program. Some pages will ask you to **SAVE** or **CREATE**. This function saves your work and resets the timer.

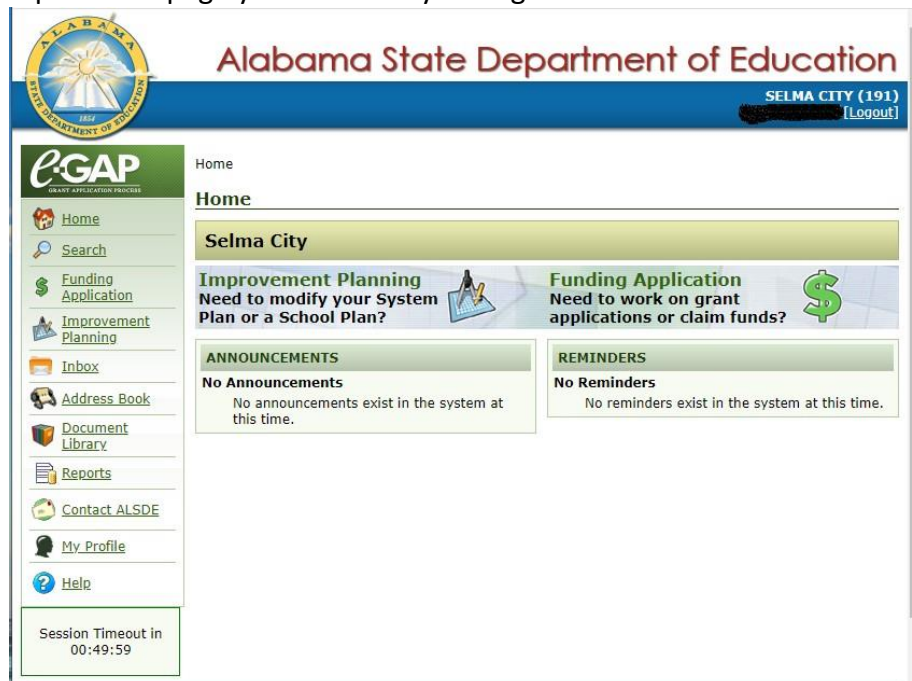
3. **Announcements and Reminders:** The **Announcements** and **Reminders** areas will be visible each time a user logs-on to the eGAP website. Check these areas periodically for important information regarding the Application process.
4. **Enter your username and password and click on Login.**

**NOTE:** Please notice the line: “**Forgotten your password?**” By selecting “**click here,**” you will be given directions for changing or retrieving a forgotten password. The information will be sent to the designated email account.

The screenshot shows the eGAP login interface. At the top is the Alabama State Department of Education logo and name. Below the logo is a blue navigation bar with a 'Login' link. The main content area has a 'Home' header and a 'Welcome to eGAP!' message. A large green box contains the login fields: 'Username:' and 'Password:' with corresponding input boxes, and a 'Login' button. Below the login box is a link: 'Forgotten your password? Want to reset your password? Click here.' At the bottom, there are two green boxes: 'ANNOUNCEMENTS' and 'REMINDERS', both displaying 'No Announcements' or 'No Reminders' exist in the system at this time.

## Navigating the System

Below is a sample of the page you will see if your logon was successful:



**NOTE:** The name of your LEA will appear in the upper right corner of the eGAP page. The **user's identity** will be shown below the name of the LEA.

1. This page has **two icons** used to access work areas. The **paper** and **compass** are the symbols for the **Improvement Planning** section, and the **dollar sign** is the symbol for the **Funding Application** section.
2. The selection of any menu item can be used for specific functions within the application:
  - **Home:** Used to return to the main page.
  - **Search:** Used to search by Organization Type, School/System, Name, Number, and County.
  - **Funding Application:** Used to take the user to the Funding Application work area.
  - **Improvement Planning:** Used to access System/School Improvement Plans.
  - **Inbox:** Used to display messages relating to Funding Applications, ES2s, and FERs.
  - **Address Book:** Used to examine contact types (authorization levels) and contacts for each funding application. **Update** the address book yearly or as needed.
  - **Document Library:** Used to access links and resource materials.
  - **Reports:** Used to view various reports relating to funding applications.
  - **Contact ALSDE:** Used to provide information regarding how to access general support and technical questions. Users may also send an email message to the ALSDE.
  - **My Profile:** Used to view and edit the user's profile.
  - **Help:** Used for miscellaneous information not located in the Documents Library.

**NOTE:** Once the application has been completed and approved, the public can access this information. They will be able to view information but will not be able to make any changes.

To protect the **security** of the application process, the session **TIMES-OUT AFTER 60 MINUTES OF INACTIVITY**. When the time-out clock reaches zero, the site will be lost, and all information **that has not been saved** will be lost. The time automatically resets to 60 minutes as you navigate through screens and complete sections. It is a good habit to **SAVE frequently**, just in case. If the time-out clock reaches zero and you are automatically logged out, you will then be required to re-enter your username and password and move to the section you need.

### Additional Resources

If you have any questions about the eGAP system or how to complete an application, please reach out to your Education Specialist at (334) 694-4516.



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# SECTION 3:

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## Federal Program Allocations & Guidance

The U.S. Department of Education (ED) provides official formula-based allocations to states by July 1 of each year for most federal programs. Once received by ALSDE, each federal program follows its specific procedures to determine allocations to LEAs in Alabama. If you have a specific question about allocations, please call LEA Accounting or the Federal Programs Office.

### Federal Program Statutes

Federal grants are subject to Federal laws and any additional requirements specified in state laws. The following statutes are the most commonly applicable to federal programs in Alabama:

- Elementary and Secondary Education Act of 1965 (ESEA) as amended by Every Student Succeeds Act, 2015 (ESSA)
- Individuals with Disabilities Education Act (IDEA)
- Alabama Administrative Code - Title 16 Education, SBOE rules, ALSDE rules

### Federal Program Regulations and Guidance

Regulations further detail the requirements of the laws. Non-regulatory guidance/informational documents usually serve to outline and describe the goals of the statute or regulations for which it was developed.

State Education Agencies (SEAs) and Local Education Agencies (LEAs) that adhere to non-regulatory guidance/informational documents are more likely to achieve the goals of the grant and comply with relevant laws and regulations.

Please visit <http://www2.ed.gov/policy/elsec/leg/essa/index.html> for more information.

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# SECTION 4:

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## Fiscal Requirements for Federal Programs

### Maintenance of Effort (MoE)

A local education agency may receive funds under a covered program for any fiscal year only if the State education agency finds that either the combined fiscal effort per student or the aggregate expenditures of the agency and the State with respect to the provision of free public education by the agency for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year, subject to the requirements of subsection (b).

*Section 8251(a)*

The Alabama State Department of Education reviews Maintenance of Effort for all LEAs annually. LEAs will be notified by LEA Accounting if they do not meet the requirements.

### Supplement, Not Supplant (SNS)

#### Title I, Part A Requirements

##### **General Information**

A State education agency or local education agency shall use Federal funds received under [Title I, Part A] only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under [Title I, Part A], and not to supplant such funds.

*ESEA Section 1118(b)(1)*

- An LEA receiving Title I, Part A funds must continue to use its Title I, Part A funds only to supplement, and not supplant, the funds that would be made available from State and local sources in the absence of such Federal funds.

##### **Compliance**

To demonstrate compliance with [the supplement not supplant requirement], a local education agency shall demonstrate that the methodology used to allocate State and local funds to each schools receiving [Title I, Part A funds] ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving [Title I, Part A funds].

*ESEA Section 1118(b)(2)*

- Under ESSA, an LEA's allocation of State and local funds to schools is examined as a whole to ensure Title I, Part A funds supplement, and do not supplant, State and local funds. An LEA can no longer be required to identify that any individual cost or service supported with Title I, Part A funds is supplemental.
- An LEA must show that its methodology to allocate State and local funds to schools results in each Title I school receiving all of the State and local funds it would otherwise receive if it were not receiving Title I, Part A funds.
- An LEA's methodology must be "Title I neutral" in that it allocates State and local funds to schools without regard for Title I status. This demonstrates an LEA did not reduce the state and local funds made available to a Title I school because such a school is also receiving Title I, Part A funds. This is consistent with the purpose of the supplement, not supplant requirement.

### **Current Methodology – LEA Methodology**

The LEA is required to provide the demonstration requirements to ALSDE **one time** for the duration of the Title I, Part A program under ESSA unless the LEA adopts or implements a revised methodology for allowing Foundation Program and local funds (non-Federal) resources. In other words, the LEA must only demonstrate its methodology for allocating Foundation Program and local funds (non-Federal) resources once, unless and until Congress reauthorizes the *Elementary and Secondary Education Act*, so long as no substantive changes are made to the LEA's methodology. **Upon adoption or implementation of a revised methodology, it is incumbent upon the LEA to provide an updated demonstration of compliance form to the Federal Programs Office within the Alabama State Department of Education.**

**LEAs that have a single school code (i.e., Elementary, Middle, and High School levels all have the same school code) are required to submit an assurance but need not provide additional demonstration requirements.** These LEAs should select the appropriate box on the demonstration template and return it to the Alabama State Department of Education.

- Follow your LEA's methodology that was submitted
- Place State Foundation Units where they are earned before placing federally funded positions in that building
  - Keep a copy of the Supplemental District Report (P-1) submitted by your CSFO through the electronic file, showing that you have followed your methodology. (Keep as proof for the auditors.)

**For additional resources, please refer to the Supplement Not Supplant Non-Regulatory Information Document released in June 2019 or call the Federal Programs Office.**

## Other Federal Programs

### **Title I, Part C – Migrant Children Education**

Funds provided under [Title I, Part C] shall be used to address the [supplemental] needs of migratory children that are not addressed by services available from other Federal or non-Federal programs, except those migratory children who are eligible to receive services under [Title I, Part A] may receive those services through funds provided under [Title I, Part A], or through funds under [Title I, Part C] that remain after the agency addresses the needs described in [the comprehensive plan].

*Section 1306(b)(2)*

### **Title I, Part D – Neglected and Delinquent Children Programs**

A program under this subpart that supplements the number of hours of instruction students receive from State and local sources shall be considered to comply with the supplement, not supplant requirement of section 1118 (as applied to this part) without regard to the subject areas in which instruction is given during those hours.

*Section 1415(b)*

### **Title II, Part A – Supporting Effective Instruction**

Funds made available under this title shall be used to supplement, and not supplant, non-Federal funds that would otherwise be used for activities authorized under this title.

*Section 2301*

### **Title III, Part A – Language Instruction for English Learners & Immigrant Students**

Federal funds made available under this subpart shall be used so as to supplement the level of Federal, State, and local public funds that, in the absence of such availability, would have been expended for programs for English learners and immigrant children and youth and in no case to supplant such Federal, State, and local public funds.

*Section 3115(g)*

### **Title IV, Part B – 21<sup>st</sup> Century Community Learning Centers**

Each application submitted under paragraph (1) shall include an assurance that subgrant funds under this part will be used to increase the level of State, local, and other non-Federal funds that would, in the absence of funds under this part, be made available for programs and activities authorized under this part, and in no case supplant Federal, State, local, or non-Federal funds.

*Section 4204(b)(2)(G)*

### **Title V, Part B – Rural Education Achievement Program**

Funds made available under subpart 1 or subpart 2 shall be used to supplement, and not supplant, any other Federal, State, or local education funds.

*Section 5232*

### **Title IX, Part A – McKinney-Vento Homeless Assistance Act**

Services under paragraph (1) – shall be designed to expand or improve services provided as part of a school's regular academic program, but not to replace such services provided under such program.

*42 U.S. Code §114433(a)(2)(A)(iii)*

## Presumptions of Supplanting for Federal Programs

According to both the U.S. Department of Education Non-Regulatory Guidance on Supplement Not Supplant in February 2008 and the 2019 Compliance Supplement, it is presumed that supplanting has occurred if one of the following three instances takes place:

1. An LEA used Federal funds to provide services that the LEA was required to make under other Federal, State, or local laws.
2. An LEA used Federal funds to provide services that the LEA provided with non-Federal funds in the prior year.
3. An LEA used Federal funds to provide services for participating children that the LEA provided with non-Federal funds for nonparticipating children.

These presumptions are rebuttable if the LEA can demonstrate that it would not have provided the services in question with non-Federal funds had the Federal funds not been available.

Some examples of documentation that can be used to rebut the presumptions of Supplement Not Supplant:

- Fiscal or programmatic documentation to confirm that in the absence of federal funds, would have eliminated the expenditure in question
- State or local legislative action
- Budget histories and information

**It is the responsibility of each LEA to make sure that they are in compliance with the supplement, not supplant, provision of each Federal grant.**

## Chart of Supplement Not Supplant

| Program Activities must be supplemental to<br><b>State and local</b> funds | Program Activities must be supplemental to<br><b>State, local, and other Federal</b> funds      |
|--|---|
| Title I, Part A<br>Title I, Part D<br>Title II, Part A                     | Title I, Part C<br>Title III, Part A<br>Title IV, Part B<br>Title V, Part B<br>Title IX, Part A |

## Comparability

### General Information

Except as provided in [ESEA Section 1118(c)(4) and ESEA Section 1118(c)(5)], a local education agency may receive funds [Title I, Part A] only if State and local funds will be used in schools served [Title I, Part A] to provide services that, taken as a whole, are at least comparable to services in schools that are not receiving funds under [Title I, Part A].

*ESEA Section 1118(c)(1)(A)*

If the local education agency is serving all of such agency's schools under [Title I, Part A], such agency may receive funds under [Title I, Part A] only if such agency will use State and local funds to provide services that, taken as a whole, are substantially comparable in each school.

*ESEA Section 1118(c)(1)(B)*

A local education agency may meet the requirements of [ESEA Section 1118(c)(1)(A) and ESEA Section 1118(c)(1)(B)] on a grade-span by grade-span basis or a school-by-school basis.

*ESEA Section 1118(c)(1)(C)*

[ESEA Section 1118(c)] shall not apply to a local education agency that does not have more than one building for each grade span.

*ESEA Section 1118(c)(4)*

For the purpose of determining compliance with [ESEA Section 1118(c)(1)], a local education agency may exclude State and local funds expended for – language instruction educational programs; and the excess costs of providing services to children with disabilities as determined by the local education agency.

*ESEA Section 1118(c)(5)*

### **Demonstrating Comparability**

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Because Title I, Part A allocations are made annually, comparability is an ANNUAL requirement.

**Under the statute, an LEA is considered to have met the comparability requirement if the LEA files with the SEA a written assurance that it has established and implemented a—**

- District-wide salary schedule;
- Policy to ensure equivalence among schools in teachers, administrators, and other staff; and
- Policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

*ESEA Section 1118(c)(2)(A)(i-iii)*

**An LEA may also meet the comparability requirement if it establishes and implements other measures such as—**

- Student/instructional staff ratios;
- Student/instructional staff salary ratios;
- Expenditures per pupil; or
- A resource allocation plan based on student characteristics such as poverty, limited English proficiency, or disability, etc.

**Supplement Not Supplant requirements are not the same as Comparability requirements.**

- Comparability requires that Foundation Program and local funds are used to provide services that, taken as a whole, are comparable between Title I and non-Title I schools.

- SNS requires LEAs to distribute Foundation Program and local funds to schools without taking into account a school's participation in the Title I program.
- Though the source of funds for both fiscal tests are similar (i.e., Foundation Program and local funds), situations may occur where the LEA satisfies the requirements within one while failing those of the other.

**For additional resources (including examples of comparability), please refer to the Title I Fiscal Issues Non-Regulatory Guidance released in February 2008 or call the Federal Programs Office.**

## Transferability

The purpose of transferability is to allow states and local educational agencies, the flexibility to target Federal funds to the programs and activities that most effectively address the unique needs of all children.

### **What funds can an LEA transfer?**

| <b>District funds may be transferred out of:</b>   | <b>District funds may be transferred into:</b>  |
|--|---|
| Title II, Part A<br>Title IV, Part A<br><i>Section 5103(b)(2)</i>  | Title I, Part A<br>Title I, Part C<br>Title I, Part D<br>Title III, Part A<br>Title V, Part B<br><i>Section 5103(b)(1)(B)</i> |
| <p><b><u>NOTE:</u></b> A local education agency may transfer all or any lesser amount of the funds allocated to it from these two programs to any program listed in the next column.</p> <p><i>Section 5103(b)(1)(A)</i></p> | <p><b><u>NOTE:</u></b> Funds cannot be transferred out of any of these programs.</p> <p><i>Section 5103(c)</i></p>            |

### **What does an LEA need to do in order to transfer funds?**

Each local education agency that makes a transfer of funds under [the transferability provision] shall –

- (A) modify, to account for such transfer, each local plan, or application submitted by the agency, to which such funds relate;
- (B) not later than 30 days after the date of such transfer, submit a copy of such modified plan or application to the State; and
- (C) not later than 30 days before the effective date of such transfer, notify the State of such transfer.

*Section 5103(d)(2)*

In the State of Alabama this is completed in eGAP on the transfer page and should be approved by the State.

## **What happens to the identity of the funds that are transferred?**

Funds transferred under [the transferability provision] are subject to each of the rules and requirements applicable to the funds under the provision to which the transfer funds are transferred.

*Section 5103(e)(1)*

## **How do transfers affect equitable services to Private School Students?**

Each local education agency that transfers funds under the [the transferability provision] shall conduct consultations [with private schools] in accordance with section 8501, if such transfer transfers funds from a program that provides for the [participation] of students, teachers, or other educational personnel, from private schools.

*Section 5103(e)(2)*

## **Time and Effort**

An employee whose salary and wages are supported, in whole or in part, with Federal funds is required to document their time spent working on Federal programs. The submitted documentation is used to ensure that charges reflect an accurate account of the employee's time and effort devoted to each Federal program. (Appendix B of 2 C.F.R. Part 225 (formerly OMB Circular A-87, *Cost Principles for State, Local, and Indian Tribal Governments*))

There are two types of documentation that are used to show time and effort in Alabama:

- 100% Certifications
- Personnel Activity Reports (PAR)

### **100% Certifications**

For employees who work solely on a single Federal award or cost objective, a periodic certification is required. These certifications must be prepared at least semi-annually and signed by the employee and supervisory official who has firsthand knowledge of the work performed after the last day on the semi-annual certification.

### **Personnel Activity Report (PAR)**

For employees who work on multiple activities or cost objectives, a Personnel Activity Report (PAR) is required.

Some examples of multiple cost objectives include:

- More than one Federal award
- A Federal award and a non-Federal award
- An indirect cost activity and a direct cost activity
- Two or more indirect activities that are allocated using different allocation bases
- An unallowable activity and a direct or indirect cost activity



When completing a Personnel Activity Report (PAR), the following is required:

- An after-the-fact distribution of the actual activity of the employee
  - Make sure to include the fund source of the activity (see sample)
- An account of the total activity for which each employee is compensated
  - Must include the entire workday (If the employee works 8 hours – 8 hours should be included on the PAR each day the employee worked.)
- Prepared on a monthly basis
- Signed by the employee and supervisory official having firsthand knowledge of the work performed after the last day of the PAR

## Personnel Activity Report Sample

Pay period end date: 2/1/2012  
 Pay date: 2/1/2012

Employee Name:                      (Printed)  
 Class/Title:

Employee SS: XXX-XX-  
 Section:

| Day         |         | Hours Worked |      |             |           |           |         |             |       | Leave Hours        |                   |      |                   |             | Total |
|-------------|---------|--------------|------|-------------|-----------|-----------|---------|-------------|-------|--------------------|-------------------|------|-------------------|-------------|-------|
|             |         | FED PGMS     | CSR  | LEARN SERVE | HOMELE SS | 21st CCLC | COMM ED | DEPEND CARE | OTHER | Total Hours Worked | Annual Sick Leave | Comp | Other Leave Hours | Other Leave |       |
| Sun         | 1/1/12  |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Sub-Total   |         | 0.00         | 0.00 | 0.00        | 0.00      | 0.00      | 0.00    | 0.00        | 0.00  | 0.00               | 0.00              | 0.00 | 0.00              |             | 0.00  |
| Mon         | 1/2/12  |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   | H           | 0.00  |
| Tue         | 1/3/12  |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Wed         | 1/4/12  |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Thur        | 1/5/12  |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Fri         | 1/6/12  |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Sat         | 1/7/12  |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Sun         | 1/8/12  |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Sub-Total   |         | 0.00         | 0.00 | 0.00        | 0.00      | 0.00      | 0.00    | 0.00        | 0.00  | 0.00               | 0.00              | 0.00 | 0.00              |             | 0.00  |
| Mon         | 1/9/12  |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Tue         | 1/10/12 |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Wed         | 1/11/12 |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Thu         | 1/12/12 |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Fri         | 1/13/12 |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Sat         | 1/14/12 |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Sun         | 1/15/12 |              |      |             |           |           |         |             |       | 0.00               |                   |      |                   |             | 0.00  |
| Sub-Total   |         | 0.00         | 0.00 | 0.00        | 0.00      | 0.00      | 0.00    | 0.00        | 0.00  | 0.00               | 0.00              | 0.00 | 0.00              |             | 0.00  |
| Total Hours |         | 0.00         | 0.00 | 0.00        | 0.00      | 0.00      | 0.00    | 0.00        | 0.00  | 0.00               | 0.00              | 0.00 | 0.00              |             | 0.00  |
| Percent     |         |              |      |             |           |           |         |             |       |                    |                   |      |                   |             |       |
| Percent Adj |         |              |      |             |           |           |         |             |       |                    |                   |      |                   |             |       |

Employee Signature / Date \_\_\_\_\_  
 Supervisor Signature / Date \_\_\_\_\_

Section Leave Verified \_\_\_\_\_  
 SDE Accounting Use \_\_\_\_\_

IF TOTAL HOURS PER DAY IS NOT EQUAL TO 8 HOURS, OR WORK IS RECORDED ON HOLIDAY OR WEEKEND, PLEASE EXPLAIN IN NOTES SECTION BELOW

## 100% Multiple Fund Source Certification Sample

LEA \_\_\_\_\_

School \_\_\_\_\_

(if applicable)

Please indicate the current employment quarter for \_\_\_\_\_  
(school year)

Documented by checking the appropriate box below:

- ☐ Quarter 1. August thru October
- ☐ Quarter 2. November thru January
- ☐ Quarter 3. February thru April
- ☐ Quarter 4. May thru July

\_\_\_\_\_ spends 100% of my time as a \_\_\_\_\_  
Employee (please print) (position)

Salary funding sources and percentages:

- 
- 
- 

\_\_\_\_\_  
Employee's Signature Date

\_\_\_\_\_  
Supervisor's Signature Date

## 100% One Fund Source Certification Sample

**<INSERT SYSTEM NAME>  
CERTIFICATION OF 100% TIME WORKED ON A SINGLE  
FEDERAL AWARD (OR COST OBJECTIVE)  
OR STATE FUNDS IF REQUIRED FOR MATCH  
AND/OR MAINTENANCE OF EFFORT**

I, <INSERT NAME>, at <INSERT SCHOOL/WORKPLACE> certify that for the period beginning  
<INSERT MONTH, DAY, YEAR> and ending <INSERT MONTH, DAY, YEAR>, worked 100% time on  
the <INSERT SPECIFIC PROGRAM> program and/or activity.

\_\_\_\_\_  
Employee's Signature / Date

\_\_\_\_\_  
Supervisor's Signature / Date

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# SECTION 5:

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## Translation and Interpretation of Services

Parents of English Learners are entitled to translation and interpretation of particular information under several Federal Programs. Local school districts must develop and implement a process for determining (1) if parents and guardians have limited English proficiency; (2) what their primary language is; and (3) what their language needs are. Local school districts should:

- translate enrollment forms and Home Language Surveys into languages that are common in the school and surrounding community
- take parents at their word about their communication needs if they request language assistance
- understand that parents may not be proficient in English, even if their child is
- provide language assistance to parents of English Learners effectively with appropriate, competent staff or appropriate and competent outside resources

### **Title I Translation/Interpretation Requirements**

In addition, Title I of the Elementary and Secondary Education Act of 1965 (ESEA) outlines that the following information must be provided “to the extent practicable, in a language parents can understand” the following:

- Information regarding achievement
- Annual state and local educational agency report cards
- Parents’ Right to Know
- Information in the school’s Title I plan
- If the school is identified for “school improvement,” information on what this means, the reasons for the identification, what the school district and state are doing to address the problems identified, how parents can become involved to help, and an explanation of the parents’ right to transfer their child to another school
- Information related to school and parent programs, meetings, and other activities and notification of the district’s parent and family engagement policy
- Meaningful consultation with parents of children participating in on the planning and implementation of family engagement programs, activities, and procedures
- The reasons a child has been identified as an English Learner and needs a language instruction educational program, the child’s level of English proficiency and academic achievement, information about the various language program options (methods of instruction used, how the programs differ, how the programs will help their child learn English, etc.), specific exit requirements for the program, and information about a parent’s right to decline to enroll their child in such a program.

### **Title III-A Allowable Translation/Interpretation Services**

Title III, Part A funds, may be used for translation and interpretation services that support the specific parent outreach and training activities found in Title III, but not those required by the Office for Civil Rights under Title VI of the Civil Rights Act or other Federal programs. For example, translation of communications, outreach, and training that are provided solely to parents of Title III-served ELs regarding the Title III-specific language program is permissible. Also, permissible are translation and interpretation services in support of outreach programs and events for the purposes of fulfilling Title III to enhance and supplement the Title III-A language instruction educational program.

For details on the allowability of Federal Funds for translation and interpretation services, please refer to the webinar PowerPoint presented by the ED Student Achievement and School Accountability Programs Office of Elementary and Secondary Education on April 21, 2011. See <https://www2.ed.gov/programs/titleiparta/titleititleiii421.pdf> for more details.

If you have more detailed questions or would like to discuss your situation, please call your Program Specialist or the Federal Programs Office.

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# SECTION 6:

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## Inventory Management for Federal Programs

The Elementary and Secondary Education Assistance Act of 1965 (ESEA) reauthorized by the Every Student Succeeds Act of 2015 (ESSA) requires, among other things, that Local Educational Agencies (LEAs) implement and maintain financial management systems that substantially comply with federal systems management requirements. These requirements, detailed in 2 C.F.R., Part 200.62– Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R., Part 200) states that LEAs shall provide: “effective control over and accountability for all funds, property, and other assets. Recipients shall adequately safeguard all assets and assure they are used solely for authorized purposes”.

To assist in reviews of financial management systems under the requirements of 2 C.F.R., Part 200, the Alabama State Department of Education (ALSDE) Federal Programs Section is issuing guidelines to Local Educational Agencies (LEAs) to:

1. assist LEAs in implementing and monitoring their federal programs inventory system;
2. to assist monitors and auditors in reviewing the systems to determine if the LEA’s inventory system is in substantial compliance with 2 C.F.R. Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and ESEA non-regulatory guidance.

General Education Provisions Act (GEPA) Sec. 443(a) requires each recipient of federal funds to keep records which fully disclose the amount and disposition of the funds, the total costs of the activity for which the funds are used and such other records as will facilitate an effective financial or programmatic audit.

### **Functions of an Inventory Review**

The inventory review requirements ensure that LEAs meet federal guidance for controlling and accounting for inventory in accordance with each federal grant’s laws and policies. The procedures and processes of an inventory have the following functions:

- Serves as a needs determination to assist LEAs in determining if additional materials and supplies need to be purchased to implement the LEA’s federal programs.
- Surveys the property in storage to determine if it is being (a) held for disposition, (b) in the process of production for disposition, or (c) to be consumed/utilized in the implementation of the LEA’s federal programs.
- Tracks the property undergoing repair. Procedures include a process for repair and a working-process tracking system.

- Provides an inventory disposition process for the loaning and issuing of equipment, as well as, the process for declaring materials as surplus.
- Provides policies and standard procedures for program planning and monitoring of equipment use.

### **Requisition of Equipment**

Inventory management procedures begin with a process of determining the need and use of the equipment. All equipment purchased with federal funds must be in accordance with the regulations of the funding source. In other words, procedures must be in place to ensure all activities, including the purchase of equipment paid for with federal funds, are necessary, reasonable, allocable, and allowable. Once purchased, the equipment must continue to be used for that or a related purpose.

The requisition for the purchase of equipment should follow the LEA's internal control procedures. Procedures should be in place to ensure prior approval of all purchases and provide specifications for receiving the equipment and issuing the equipment to the proper locations.

### **Entry of Information into Inventory Management System**

Once the equipment has been received, the LEA must have a procedure in place for the entry of information into the LEA's inventory management system. The federal programs director/s and school principal are responsible for the management and inventory of such equipment. The inventory must be available for review and evaluation. A copy of the inventory should be kept at both the LEA office and at the school level. The inventory can be kept electronically so that it is easily assessable at both the LEA and the school level.

The written procedures should include the following requirements for equipment items purchased with federal funds:

1. All equipment should be properly tagged and labeled for inventory tracking. The label should mark the equipment with the appropriate federal program name and include the fiscal year of purchase and property of the respective LEA.
2. The school shall retain such property in a program as long as there is a need for such property to accomplish the purpose of the program for which it was purchased.
3. The inventory must be current and available for review and audit. 2 CFR 200.311, 2 CFR 200.313 and 2 CFR 200.439 states the following information must be included in the recipient's inventory records:

- A description of the equipment
- A serial number, model number, or other identification number
- The funding source (including the FAIN) and percentage (who holds the title) under which the equipment was acquired

**Note:** Equipment purchased with federal funds shall be identified to indicate Federal ownership by the specific federal program (e.g., items purchased with Title I Part A monies must be marked as Title I, Part A with grant award year).

- The source of property (vendor)
- The acquisition date and unit cost

- The present location of the equipment
  - Indication of the use of the equipment  
**Example:** instruction, professional learning, parent and family engagement, administration, etc.
  - The condition of the equipment
  - The date the information was added to the inventory
  - Who holds the title to the equipment? If funds from more than one program were used to purchase the equipment, then each program should be listed as the title, and if possible, notation of percentage should be listed.
  - All pertinent information on the final transfer, replacement, or disposition of the equipment (including the date of disposal and/or sale price of the equipment)
4. Inventory must be updated as equipment items are purged, or new purchases are made.
  5. Equipment items purchased with federal funds are to be identified and physically marked, as noted above.
  6. Adequate safeguards must be in place related to the loss, damage, or theft of the equipment. Any loss, damage, or theft should be investigated and fully documented.
  7. Adequate maintenance procedures should be implemented to keep the equipment in good condition.

### **Procedures for Disposition of Equipment**

The LEA should establish procedures for determining the lifecycle of the equipment, as well as a depreciation methodology. When original or replacement equipment acquired with federal funds is no longer needed for the original project or program, the equipment may be retained, sold, or disposed of, if it is not needed in any other federally funded project or program. The LEA will need to ensure that records are kept and made available for monitors and auditors as to where the equipment was transferred.

The following are the procedures to eliminate any equipment item from the inventory:

1. Equipment items with an acquisition cost/current per unit fair market value of less than \$5,000 and are more than three years old may be retained, sold, or disposed of, with no further obligation to ALSDE. The disposition of such items should be so noted on the equipment inventory maintained by the LEA.
2. Equipment items with an acquisition cost of \$5,000 or more may be retained or sold, and the awarding agency shall have a right to amount calculated by multiplying the current market value or proceeds from the sale by the awarding agency's share of the equipment.
  - a. If the current per unit fair market value is \$5,000 or more, the equipment may be retained or sold, and the awarding agency shall have a right to an amount calculated by multiplying the current market value or proceeds from the sale by the state's share of the equipment. However, the entity is permitted to deduct and retain from the state's share \$500 or 10-percent of the sales proceeds, whichever is less, for the entity's selling and handling expenses.

- b. The disposition of such items should be so noted on the equipment inventory maintained by the recipient. The recipient should include the date of disposal and sales price or the method used to determine current fair market value if the recipient compensates the state.

### **Loss, Damage, or Theft of Equipment**

2 C.F.R. Part 200.313 (d)(3) requires that a control system be developed by recipients of federal funds to ensure that there are adequate safeguards to prevent loss, damage, or theft of the property, including real property, equipment, and pilferable items. These procedures should include:

- Adequate safeguards to prevent loss, damage, or theft of the equipment. Some possible control features could include:
  - Locks or security camera (for particularly valuable or vulnerable items)
  - Access controls to warehouses to limit entry by unauthorized personnel
  - Use of logs or sign-in sheets for certain items of property (For example, iPads, laptops, cameras, projectors)
  - Procedures for promptly entering items received into the inventory management system
  - Process for investigation of any loss, damage, and/or theft of equipment. Any loss, damage and/or theft of equipment purchased with federal funds should be reported to the LEA level federal program staff
  - Documentation of notification of loss, damage, or theft of equipment, and if appropriate, any police reports

### **Equipment Use for Participating Private Schools**

Funds from several federal programs may be used to purchase materials and equipment to meet the needs of participating (students eligible to receive services) private school students. It is important to remember that although the equipment may be used by the private school, the LEA purchasing the equipment retains title and must continue to account for the equipment in its inventory management system. The ALSDE shall require all LEAs serving private school children to implement adequate procedures and internal controls to account for the location, custody, and security of materials, equipment, and property purchased with federal funds for private school use.

These procedures must include the proper labeling of materials and equipment purchased with federal funds. Policies and procedures should be followed to ensure that private school officials do not use these materials and equipment with ineligible children. In addition, disposal procedures should follow LEA policy.



The LEA shall maintain an inventory of all materials, equipment, and property purchased with federal funds for use with eligible students at private schools. The inventory shall contain the same requirements for any equipment purchased with federal funds. These requirements are:

- A **description** of the equipment
- A **serial number**, model number, or other identification number
- The **funding source (including FAIN) and percentage** under which the equipment was acquired

**Note:** Equipment purchased with federal funds shall be identified to indicate Federal ownership by a specific federal program (e.g., items purchased with Title I, Part A monies must be marked as Title I, Part A with grant award year.)

- The **source of property (vendor)**
- The **acquisition date** and **unit cost**
- The present **location** of the equipment (school, classroom, etc.)
- Indication of the **use** of the equipment instruction, professional learning, parent and family engagement, administration, etc.
- The **condition** of the equipment
- The **date** the information was added to the inventory
- Who holds the **title** to the equipment?
- All pertinent information on the final transfer, replacement, or **disposition** of the equipment (including the date of disposal and/or sale price of the equipment)

These inventory guidelines should be followed:

1. Inventory must be updated as equipment items are purged or new purchases are made.
2. Equipment items purchased with federal funds are to be identified and physically marked, as noted above.
3. Adequate safeguards must be in place related to the loss, damage, or theft of the Equipment. Any loss, damage, or theft should be investigated and fully documented.
4. Adequate maintenance procedures should be implemented to keep the equipment in good condition.
5. A physical inventory of equipment items must be taken and the results reconciled with the inventory records.

The LEA should follow the same disposition plan for the equipment purchased for participating private school students as with any equipment purchased with federal funds in the public school.

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# SECTION 7:

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## Federal Programs Monitoring

### **Definition and Purpose of Monitoring**

Monitoring is the regular and systematic examination of an LEA's administration and implementation of the Federal education grant, contract, or cooperative agreement administered by the United States Department of Education (ED) through the Alabama State Department of Education (ALSDE). Monitoring assesses the extent to which States provide leadership and guidance for local education agencies (LEAs) and schools in implanting policies and procedures that comply with statutes and regulations. ED requires the ALSDE to monitor LEA implementation of Federal education grants.

### **LEA Self-Assessment**

The LEA will complete an annual self-assessment. The Self-Assessment will serve as a catalyst for the LEA program review and provide the opportunity for the LEA to request specific technical assistance from the ALSDE. The ALSDE will compile identified needs for the purpose of planning local, regional, and state training sessions to address identified needs.

### **ALSDE Desk Reviews**

The ALSDE Desk Review will examine evidence that demonstrates the LEA focuses federal funds on programs, services, materials, and other support to ensure that all students particularly those who are among the targeted subgroups - economically disadvantaged, major racial/ethnic groups, English Learners, migrant, students with disabilities - reach proficient and advanced levels on the state's assessments.

- Evidence will be gathered through the approval process for eGAP applications.
- LEA Expenditure Reports and eGAP budgets will be reviewed to ensure that the LEA systematically coordinates the use of the separate sources of federal funds with state and local funds and to verify funds were spent according to approved budgets and to supplement and not supplant state and local funds.

### **Onsite Reviews**

School districts will be scheduled for an onsite review based on a combination of a five-year cycle and risk assessment. The Federal Programs Section of the Alabama State Department of Education On-Site Compliance Review Manual and eProve will be used to document review findings.

- Each local education agency is encouraged to contact their regional specialist for assistance in preparing for an onsite review.

## Federal Programs Comprehensive Monitoring Visit Protocol

| Pre-Monitoring Activities   | Onsite Visit   | Post-Visit/Corrective Action Support  |
|---|--|---|
| <p><b>Technical Assistance</b></p> <p>Onsite per request by LEA 2 to 3 months prior to a scheduled monitoring visit</p>   | <p>Some of the activities that will take place during an Onsite Visit include:</p> <ul style="list-style-type: none"> <li>Entrance Conference</li> <li>School Visits</li> <li>Parent Interviews</li> <li>Program Coordinator Interviews</li> <li>Exit Conference with Federal Programs Coordinator and other staff as desired by the District</li> </ul> <p><b>NOTE:</b> The onsite visit may last from 1 to 3 days, depending on evidence revealed through the desk review, interviews, school visits, and whether the District has submitted all requested information in a timely manner.</p> | <p><b>No Findings Found</b></p> <p>The monitoring visit process is completed for the Federal Programs Section</p>   |
| <p><b>Document Request Email</b></p> <p>Some of the items that will be requested include:</p> <ul style="list-style-type: none"> <li>Budget Analysis Report by Cost Center (YTD)</li> <li>List of New Hire Teachers</li> <li>Gross Employee Salary Report by Cost Center (Current Year)</li> <li>Teachers paid with Federal Funds</li> <li>List of all instructional paraprofessionals in Title I schools</li> <li>LEA Planning Template</li> <li>List of schools with high EL populations and number of EL students</li> </ul> |  | <p><b>Findings Found</b></p> <p>The Program Coordinator will be guided through the Corrective Action Process by the Monitoring Team Leader.</p> <p>Here is a brief summary of the process:</p> <ol style="list-style-type: none"> <li>Findings, follow actions and timeline explained on site</li> <li>Technical Assistance related to follow-up actions or documents required to clear the findings explained with a timeline for submission in eProve as requested or needed by District</li> <li>Monitoring Team Leader directs/reviews/approves documentation submitted in eProve or via email</li> </ol> |
| <p><b>Desk Review</b></p> <p>Review documentation submitted in eProve</p>   |  |   |

## Preparing for Onsite Review

| ALSDE Responsibilities   | LEA Responsibilities  |
|--|---|
| <ul style="list-style-type: none"><li>• Contact LEA Federal Programs Coordinator at least two weeks prior to the onsite/desk review</li><li>• Provide a planning template for scheduling school visits</li><li>• Identify schools that will be visited</li><li>• Inform the Federal Programs Coordinator of expectations and process for the school visits</li></ul> | <p><b>District Level:</b></p> <ul style="list-style-type: none"><li>• Review the onsite monitoring document</li><li>• Contact your ALSDE Specialist to provide technical assistance (if needed)</li><li>• Review the Required Documents List provided by ALSDE</li><li>• Collaborate with all central office staff responsible for reports, personnel, inventory, and fiscal issues</li><li>• LEA Federal Programs Coordinator notifies the schools selected for visits and explains the school visit process to the staff</li><li>• Organize all supporting documents that confirm meetings, work sessions, parent notifications, and collaboration so that they are easily accessible (sign-in sheets, agendas, working notes, emails, etc.)</li></ul> <p><b>School Level:</b></p> <ul style="list-style-type: none"><li>• School teams should include the Principal, ACIP members and others that are designated by the principal</li><li>• School principals are responsible for having teams assembled at scheduled times</li><li>• Encourage all the school team members to be comfortable with sharing the ACIP revision process and the wonderful things that are going on in their schools</li></ul> |

## Federal Programs Compliance Monitoring Q&A

1. How often do you conduct a compliance monitoring onsite visit of a school system?
  - A compliance monitoring onsite visit will be conducted on school systems determined by the ALSDE Risk Assessment this is performed on every school system in the spring of each year.
2. When is the schedule set for each school system for a compliance monitoring onsite visit?
  - The schedule will be set in June of each year.

3. How long does it take to conduct a compliance monitoring onsite visit?
  - Depending on the size of the school system, most visits last 2 to 3 days.
4. How many staff members from the ALSDE will be conducting the on-site visit?
  - It varies depending on the size of the school system.
5. What happens when the school system is out of compliance?
  - The school system will need to create a Corrective Action Plan (CAP) in order to bring the school system into compliance.
6. How much time does a school system have to complete the Corrective Action Plan?
  - Each school system has 60 days from the date of the exit conference (last day of the onsite visit) to have all findings corrected and documentation submitted to the ALSDE as evidence.
7. Can a school system ask for assistance from Federal Programs before the review?
  - Yes, we encourage school systems to do so. A Technical Assistance form can be downloaded from the Compliance Monitoring section of the ALSDE website.
8. Can we correct items when the compliance monitoring onsite visit is in process and have the findings removed from the report and taken off the CAP?
  - You may correct the findings, but they will be marked as a finding and listed as corrected onsite.
9. When does the school system receive the report?
  - The report is sent electronically to the school system at the end of the compliance onsite monitoring visit.
10. How can I find out when my school will be reviewed again?
  - In the spring of each year, the ALSDE Risk Assessment will determine which school systems will be monitored, and a schedule will be available in June of each year.
11. What resources are available prior to or during the onsite monitoring visit?
  - Staff Assignments for Onsite Document Review and Site Visits
  - Parent Interview Information and Questions
  - School Visitation Interview Questions (Served and Non-Served)
  - Private School Visitation Interview Questions (if served)
  - Sample Email with Information
  - Evidence of Implementation and Compliance Supplement
  - LEA Onsite Visit Planning Template

All these resources are available by request and during the MEGA Federal Program Coordinator training.

### **Federal Programs Common Citations/Findings at LEA Compliance Monitoring**

- Enrollment Procedures
- Evidence that the LEA developed a high-quality age-appropriate English language instructional education program(s), which are evidence-based and designed to meet the needs of EL children, including immigrant children and youth
- Teacher Units (Can be a Supplement/Supplant issue)
- Expenditures (Can be a Supplement/Supplant issue)
- Certified Teachers

- Time and Effort/100% Certification
- Inventories
- Evaluations
- EL Core Acquisition Program Evaluation
- English Learners (EL)
- Board Policies that deal with Immigrant, Migrant, Homeless, Foster Care and EL students
- Homeless Program
- Private Schools
- No evaluation of the Title III program
- LEA has not ensured that all core academic subject teachers who teach in a school-wide program were certified and teaching in-field at the time they were hired
- LEA does not have a procedure that allows parents/guardians to waive Title III supplemental English language instruction educational services
- LEA has not provided high-quality professional development to teachers who provide English language development or access to the core curriculum
- LEA has not developed high-quality age-appropriate English language instruction educational programs that are scientifically research-based and designed to meet the needs of EL children
- LEA does not have a formal plan for disseminating information about programs for homeless children and youth
- School leadership team could not describe the core curriculum used for ELs and did not receive adequate professional development
- Documentation does not support consultation with an appropriate representative for determining LEA set-asides
- Documentation revealed that the LEA violated supplement not supplant by purchasing classroom furniture
- There is no evidence parent notification was provided for students being taught by a certified teacher teaching out-of-field
- Timely consultation with the non-public school was not provided to ensure the inclusion of non-public school participation in eGAP
- Evidence for determining equitable services to non-public schools by the LEA was not provided
- School-Parent Compacts are not being utilized correctly
- School-Parent Compacts are missing signatures
- School personnel are not sure of the purchase for the School-Parent Compact
- LEA does not have the required evaluation for each Electronic Continuous Improvement Plan for schoolwide schools
- State earned foundation units were not placed appropriately prior to Title I funded staff being placed in Title I schools
- Evidence revealed that the school's annual meeting of Title I parents did not inform parents of Title I requirements and their right to be involved
- School-Parent Compacts did not include the six required components under School Responsibility

- No evidence that the LEA makes private school officials aware of the procedure to file a complaint to the ALSDE regarding timely and meaningful consultation
- LEA does not have a formal plan for disseminating information about programs for homeless children and youth
- No evidence that the LEA conducts an annual evaluation of the effectiveness of programs for homeless children and youth
- No evidence that the LEA conducted or sponsored professional development for the school/LEA personnel in order to heighten awareness of the problems and needs of homeless children
- Incorrect procedures are in place in regards to a struggling EL student during the two year monitoring time frame
- Evidence revealed that not all teachers in Title I SW schools are certified
- The district could not provide evidence of a dispute resolution policy for homeless education
- LEA has not ensured that all core academic subject teachers who teach in a Title I SW program were certified at the time they were hired
- LEA has not been able to systematically communicate the English Learner Policy to all school and LEA personnel, specifically the vocabulary related to procedures surrounding the exit criteria or monitoring after exiting
- LEA has not systematically provided professional development to all school and LEA personnel related to WIDA Standards and defining a core curriculum for ELs
- LEA has not ensured that Federal funds under Title I, Part A are only to supplement the funds that would in the absence of such Federal funds be made available from non-Federal sources, and not to supplant such funds
- Time and Effort is not maintained correctly for all employees paid with federal funds
- All teachers whose salaries are paid with Title II funds are not fully certified to teach in the areas to which they have been assigned
- No evidence that a Core ESL program was in place or evaluated
- Insufficient documentation that the 21<sup>st</sup> CCLC program is being implemented according to the approved application
- Board approved policy of admitting students does not include a statement including immigrant status
- No evidence to verify the evaluation of the Core ESL program
- Parent Interview responses did not support that the LEA Parent and Family Engagement Plan was developed jointly with, agreed on, and distributed to parents
- LEA did not make private school officials aware of the procedure to file a complaint to the ALSDE regarding timely and meaningful consultation in the initial letter sent to private schools
- LEA procedure for waiving EL services should only allow waiving Title III supplemental services
- Documentation and staff interviews did not support that effective professional development has been provided for policies, procedures, and the Core EL program

- ACIP budget pages do not reflect the correct amounts allocated to the schools according to eGAP and MacAleer budget analysis reports
- Instructional aides being paid with Title I funds were functioning as special education aides
- LEA has not maintained 100% certification documentation for teacher paid with Title II funds
- Non-certified teachers or teachers teaching out-of-field in Title I schoolwide schools
- LEA expenditures for personnel do not match the approved application
- No evidence that the district has a process for inventorying equipment purchases
- LEA documentation reflected that each EL student had not been assessed for growth in English language acquisition using the state-approved test ACCESS for ELLs



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# SECTION 8:

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## Records Retention

Local Educational Agencies (LEAs) receiving federal funds are required to maintain records in accordance with the 2 C.F.R. Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. In addition, LEAs must comply with local records retention policies.

LEA records maintained in accordance with 2 C.F.R. Part 200 will be considered in compliance with federal requirements for records retention. 2 C.F.R. Part 200 sections appropriate for records retention are provided below. However, LEAs should consult the complete document for regulations on administering federal programs. The complete document is available at <http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>.

### Title 34 Code of Federal Regulations Parts 76

#### **§ 76.730 – Records Related to Grant Funds of EDGAR**

A state and subgrantee shall keep records that fully show:

- Amount of funds
- How funds were used
- Total cost of the project
- Share of the cost provided from other sources
- Other records to facilitate an effective audit

Note: There are references throughout the new reporting requirements on financial management in 2 C.F.R. § Part 200.302 (performance reporting)

#### **§ 76.731 – Records Related to Compliance**

A state and subgrantee shall keep records to show its compliance with the program requirements.

If you have additional questions about records retention, please contact your Education Specialist or the Federal Programs Office for more information.

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# SECTION 9:

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## Evidence-Based Intervention

### **Purpose**

The purpose of this guidance is to support Local Educational Agencies (LEAs) in successfully choosing and implementing evidence-based practices, strategies, and interventions (referred to as “interventions”) that improve outcomes for students. Using, generating, and sharing evidence about effective interventions to support students gives stakeholders an important tool to improve student learning.

### **The Shift to Evidence-Based Interventions**

Broadly, evidence-based interventions are those who have research evidence supporting their success. ESSA delineates “evidence-based” actions according to four categories that reflect the strength of evidence:

Except as provided in subparagraph (B), the term “evidence-based,” when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that—

- (i) demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on—
  - (I) strong evidence from at least one well-designed and well-implemented experimental study;
  - (II) moderate evidence from at least one well-designed and well-implemented quasi-experimental study; or
  - (III) promising evidence from at least one well-designed and well-implemented correlational study with statistical controls for selection bias; or
- (ii) (I) demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and  
(II) includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

*Section 8101(21)(A)*

When used with respect to interventions or improvement activities or strategies funded under section 1003, the term “evidence-based” means a State, local educational agency, or school activity, strategy, or intervention that meets the requirements of subclause (I), (II), or (III) of subparagraph (A)(i).

*Section 8101(21)(B)*

The fourth category, located in *Section 8101(21)(A)(ii)*, demonstrates a rationale which is supported by one of the following methods:

- high-quality research OR
- a positive evaluation that the intervention is likely to improve student outcomes

Regardless of the method chosen above, it must be supported by a well-specified logic model.

|                            | Levels of Evidence            |                                 |  |  |
|----------------------------|-------------------------------|---------------------------------|--|--|
|                            | <b><i>Strong Evidence</i></b> | <b><i>Moderate Evidence</i></b> | <b><i>Promising Evidence</i></b>                                 | <b><i>Demonstrate a Rationale</i></b>                                    |
| <b><i>Study Design</i></b> | Experimental Study            | Quasi-experimental Study        | Correlational Study with statistical controls for selection bias | Provides a well-specified logic model informed by research or evaluation |

ESSA and U.S. Department of Education regulations require districts and schools to spend federal funds in support of evidence-based interventions:

| <b><i>Federal Funding Source</i></b>          | <b><i>Level of Evidence Required</i></b>   |
|---|--|
| Title I, Part A 1003 SIG (School Improvement) | Interventions must have evidence that is either strong, moderate or promising to support them. |
| All Other Federal Programs                    | Interventions can fall into any of the four categories.  |

### Supporting Resources

- ESSA and Evidence: Why It Matters (Chiefs for Change policy brief) – <http://chiefsforchange.org/wp-content/uploads/2016/07/ESSA-and-Evidence-Why-It-Matters.pdf>
- Using Evidence to Strengthen Education Investments (ED Non-Regulatory Guidance) – <https://www2.ed.gov/policy/elsec/leg/essa/guidanceusesinvestment.pdf>

### Online Databases

Several online databases have been developed to assist LEAs in identifying evidence-based interventions. Below is a list of some of the available databases:

- **Evidence for ESSA:** Center for Research and Reform in Education at Johns Hopkins University, in collaboration with a distinguished Technical Work Group, focuses on math and reading programs. (<https://www.evidenceforessa.org/>)
- **Best Evidence Encyclopedia:** Summaries of scientific reviews produced by many authors and organizations, as well as links to the full texts of each review on a variety of programs available for students in grades K-12. (<http://www.bestevidence.org/>)
- **Child Trends:** Program evaluations and research syntheses on child development topics, including language and learning in early childhood and for parents and families, and addresses issues affecting disadvantaged students, such as poverty and inequality. (<https://www.childtrends.org/>)
- **Doing What Works Library:** Connects research to action and helps educators implement research-based practices more effectively. (<https://dwwlibrary.wested.org/>)

- **National Center for Education Evaluation (NCEE) and Regional Assistance:** Quick and easy access to evidence-based information to help educators and policymakers make informed decisions about education programs. (<https://ies.ed.gov/ncee/>)
- **Results First Clearinghouse Database:** Numerous searchable databases with ratings. (<https://www.pewtrusts.org/en/research-and-analysis/data-visualizations/2015/results-first-clearinghouse-database>)
- **What Works Clearinghouse:** Provides existing research on different programs, products, practices, and policies in education with the goal of providing educators with the information they need to make evidence-based decisions. (<https://ies.ed.gov/ncee/wwc/FWW>)
- **Regional Educational Laboratory:** A free reference desk service for LEAs and schools which provides references and summaries of research tailored for topics requested. (<https://ies.ed.gov/ncee/edlabs/askarel/index.asp?REL=southeast>)

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# SECTION 10:

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## Individual Federal Program Information

In this section of the Federal Programs Handbook, each individual program is included. If you have any questions regarding any specific program, please call the Federal Programs Office for assistance.

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### Title I, Part A – Improving the Academic Achievement of the Disadvantaged

#### Purpose

The purpose of Title I, Part A is to provide all children a significant opportunity to receive a fair, equitable, and high-quality education and to close educational achievement gaps.

#### LEA Identification and Selection of School Attendance Areas and Schools, and Allocations of Title I Funds to School Attendance Areas and Schools

A local educational agency (LEA) will use funds received under Title I, Part A only in eligible school attendance areas. The term “school attendance area” means, in relation to a particular school, the geographical area in which the children who are normally served by that school reside. The term “eligible school attendance area” means a school attendance area in which the percentage of children from low-income families is at least as high as the percentage of children from low-income families served by the LEA as a whole.

The following points summarize the requirements of Section 1113 of ESEA and §200.77 and §200.78 of the Title I regulations for identifying eligible school attendance areas, selecting those eligible areas that will participate in Title I, Part A; and allocating Title I, Part A funds to participating areas.

## General Selection Requirements

1. An LEA must annually rank all of its school attendance areas (the geographic area from which a public school draws its children) according to their percentages of poverty.
  - An LEA must use the same measure of poverty for:
    - Identifying eligible school attendance areas.
    - Determining the ranking of each area.
    - Determining the allocation for each area.
  - The LEA must select a poverty measure from the following options:
    - Children ages 5 to 17 in poverty as counted in the most recent census data approved by the secretary.
    - Children eligible for free or reduced meals (FRM) under the Richard B. Russell National School Lunch Act.
    - Children in families receiving assistance under the state program funded under Title IV of the Social Security Act Temporary Assistance for Needy Families (TANF).
    - Children eligible to receive medical assistance under the Medicaid program.
    - A composite of any of the above measures.
  - An LEA must rank school attendance areas based on the percentage (not the number) of low-income children counted and without regard to grade spans.
  - Identified students under Community Eligibility Provision (CEP) are eligible under the Richard B. Russell National School Lunch Program (NSLP). If an LEA selects NSLP data as its poverty measure (or uses the data in a composite) and has a CEP school, the CEP data will be part of the NSLP data that the LEA uses for within district allocation.
2. After an LEA has ranked all of its school attendance areas by poverty, the LEA must first serve, in rank order of poverty, its areas above 75-percent poverty, including any middle schools or high schools.
  - EXCEPTION—An LEA may choose to lower the 75-percent poverty threshold to 50-percent for high schools.
3. Only after an LEA has served all of its areas with a poverty rate above 75-percent may the LEA serve lower-ranked areas. The LEA has the option to (1) continue on with the district-wide ranking or (2) rank remaining areas by grade-span groupings.
  - If an LEA has no school attendance areas above 75-percent poverty, the LEA may rank its schools districtwide or by grade-span groupings.
  - An LEA's organization of its schools defines its grade-span groupings. For example, if an LEA has elementary schools serving all elementary grades, middle schools, and high schools, the grade-span groupings would be grades K to 5, 6 to 8, and 9 to 12. To the extent that an LEA has schools that overlap grade spans (e.g., K to 5, K to 8, 6 to 12), the LEA should include a school in the grade span in which there are the greatest number of grades represented. For example, a K-8 school would be included with other elementary schools...because this K-8 school has more elementary grades (5) than middle school grades (3).
4. An LEA with an enrollment of less than 1,000 students or with only one school per grade span is not required to rank its school attendance areas.

## **LEA Discretion in Selecting Participating Areas and Schools**

### **5. An LEA may:**

- Designate as eligible any school attendance area or school in which at least 35 percent of the children are from low-income families, i.e., the 35-percent rule.
- Use Title I, Part A funds in a school that does not serve an eligible school attendance area if the percentage of children from low-income families enrolled in the school is equal to or greater than the percentage of such children in a participating school attendance area of the LEA.
- Elect not to serve an eligible school attendance area or eligible school that has a higher percentage of children from low-income families if—
  - i. the school meets the comparability requirements of section 1118(c);
  - ii. the school is receiving supplemental funds from other State or local sources that are spent according to the requirements of section 1114 or 1115; and
  - iii. the funds expended from such other sources equal or exceed the amount that would be provided under this part.
- For one additional year only, designate and serve a school attendance area or school that is no longer eligible but was eligible and served in the preceding year. When using this option, an LEA must meet the requirement to serve schools in rank order. This is commonly known as the Grandfather Clause.

## **Allocating Title I Funds to Participating Areas and Schools**

The Alabama State Department of Education has established that the ranking of school attendance areas to determine eligible attendance areas and the rank order in which to allocate Title I, Part A funds to participating attendance areas will be based on the total number of children enrolled in the school, minus the number of pre-kindergarten children enrolled in the school and upon a poverty measure selected by the LEA from the list above.

The number of low-income children will be based on either of the following poverty measurers:

- The total number of children eligible for free or reduced meals (FRM) under the Richard B. Russell National School Lunch Act who are enrolled in the school, minus the number of pre-kindergarten students eligible for FRM under the Richard B. Russell National School Lunch Act.
- The total number of students eligible using direct certification data minus pre-kindergarten students, such as data from the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Families (TANF) program. This is commonly known as the Community Eligibility Provision (CEP).

6. An LEA must allocate Title I, Part A funds to participating school attendance areas or schools in rank order based on the total number of children from low-income families in each area or school. An LEA with an enrollment of less than 1,000 students or with only one school per grade span is not required to allocate funds to areas or schools in rank order.

7. If an LEA serves any areas or schools below 35 percent poverty, the LEA must allocate to all its participating areas or schools an amount for each low-income child in each participating school attendance area or school that is at least 125 percent of the LEA's allocation per low-income child. This is commonly known as the 125 percent Rule.
  - An LEA's allocation per low-income child is the total LEA allocation under Title I, Part A, Subpart 2 divided by the number of low-income children in the LEA as determined using the poverty measure selected by the LEA to identify eligible school attendance areas. The LEA then multiplies this per-child amount by 125 percent.
  - An LEA calculates 125 percent of its allocation per low-income child before the LEA reserves any funds.
  - An LEA must allocate at least this amount for each low-income child in every school the LEA serves, not just for those schools below 35 percent poverty.
  - If remaining funds are not sufficient to fully fund the next ranked eligible school attendance area or school, the LEA may serve the area or school if it determines the funds are sufficient to enable children to make adequate progress toward meeting the state's challenging performance standards.
8. An LEA serving only areas or schools at or above 35 percent poverty must allocate funds in rank order, on the basis of the total number of low-income children in each area or school, but is not required to allocate 125 percent of the LEA's allocation per low-income child (described above). However, in determining what per-child amount to allocate, the LEA should bear in mind the purpose of such funding is to enable children who are most at-risk of not meeting the state's challenging student academic achievement standards. The per-child allocation amount must be large enough to provide a reasonable assurance that a school can operate a Title I program of sufficient quality to achieve that purpose.
9. An LEA is not required to allocate the same per-child amount to each area or school. However, the LEA must allocate a higher per-child amount to areas or schools with higher poverty rates than it allocates to areas or schools with lower poverty rates.
10. An LEA that opts to serve schools below 75 percent poverty using grade-span groupings may determine different per-child amounts for different grade spans, as long as those amounts do not exceed the amount allocated to any area or school above 75 percent poverty. Per-child amounts within grade spans may also vary, so long as the LEA allocates higher per-child amounts to areas or schools with higher poverty rates than it allocates to areas or schools with lower poverty rates.

### Improving Basic Programs Operated by Local Education Agencies

The purpose of this title is to provide all children significant opportunity to receive a fair, equitable, and high-quality education and to close educational achievement gaps.

- Two types of Title I Schools:
  - Targeted Assistance (Section 1115)
  - Schoolwide (Section 1114)



### **Targeted Assistance Program**

- Identifies students experiencing academic difficulties and provides additional instructional assistance to help them meet challenging achievement standards.
- Uses multiple criteria established by the LEA, serves students in a rank order, and provides the process for their return to regular class support when goals have been met.

### **Targeted Assistance - Supplement Not Supplant**

Funds received under this part **may not** be used to provide services that are otherwise required by law to be made available to children but may be used to coordinate or supplement such services.

- All fund expenditures must be based on needs assessments and supported by strategies that have been researched and proven effective.

### **Schoolwide Programs**

- The primary purpose of a Title I schoolwide program is to upgrade the entire educational program of a school that has a high concentration of students from low-income families.
- A school in which not less than 40% of students enrolled are from low-income families is eligible to plan and implement a Title I schoolwide program.
- Plan is updated/revised as student achievement data and needs change.
- Identification of students on eligible list not required
- Permits flexibility with coordination of federal and non-federal funds to support a collaboratively developed **schoolwide plan**
- Built on schoolwide reform strategies rather than separate add-on services
- Eliminates isolation of programs, students, and teachers

### **How does a school become Schoolwide?**

In order to become a schoolwide school, the school is usually a targeted assistance school for one full year, unless the LEA determines a lesser time is needed, or the school has been working on a current Continuous Improvement Plan in the eProve platform.

- If the school has been under a working ACIP plan and meets the 40 percent poverty criteria, it may skip the TA year and become schoolwide.
- The school staff, in consultation with the LEA, reaches a consensus that the school is ready to become a schoolwide program.
- The superintendent submits a letter with the school's poverty percentage of 40% or higher based on the (20<sup>th</sup> day after Labor Day) fall data collection to the ALSDE federal programs coordinator announcing a new schoolwide program.
- The Federal Programs Coordinator prepares budgets in the Electronic Grant Application Process (eGAP)
- The school is designated as "SW" on the Building Eligibility Page in eGAP, reflecting how the school will be served.
- The school begins operating under its Schoolwide ACIP.
- Faculty evaluates strategies periodically.
- At the end of the year, the Title I Committee looks at data and evaluates both the strategies implemented and how Title I funds were utilized.

# Title I, Part A – Foster Care Program

## General Information

**Every Student Succeeds Act of 2015 (ESSA)** removed “awaiting foster care placement” from the definition of homeless children and youth under the McKinney-Vento Act.

Foster care means 24-hour substitute care for children placed away from their parents or guardians and for who the Title IV-E agency has placement and care responsibility. This includes, but is not limited to, placements in foster family homes, foster homes of relatives, group homes, emergency shelters, residential facilities, childcare institutions, and pre-adoptive homes. A child is in foster in accordance with this definition regardless of whether the foster care facility is licensed and payments are made by the State, Tribal, or local agency for the care of the child, whether adoption subsidy payments are being made prior to the finalization of an adoption, or whether there is Federal matching of any payments that are made.

*Final ESSA regulations on accountability/state plans: Students experiencing homelessness and in foster care.* NAEHCY, November 29, 2016.

<https://naehcy.org/wp-content/uploads/2018/03/ESSARulesAnnounceFINAL.pdf>

Title I, Part A of ESEA, as amended by ESSA, now contains key protections for children in foster care that require State and local education agencies (SEAs and LEAs) to collaborate with child welfare agencies to ensure the educational stability of children in foster care. The new provisions will ensure that children in foster care experience minimal educational disruption as a result of foster care placement and receive the same opportunities as their peers to develop the skills necessary to be successful in school and life.

*Non-regulatory guidance: Ensuring educational stability for children in foster care.* US Department of Education and the US Department of Health and Human Services, June 23, 2016.  
<https://www2.ed.gov/policy/elsec/leg/essa/edhhsfostercarenonregulatorguide.pdf>

## LEA Foster Care Plans

**Each Plan is Updated Annually and Must Include:**

1. Number of students in foster care for the previous year
2. Number of students in foster care for the current year
3. List of agencies in collaboration
4. Description of policy review and revision
5. Description of collaboration and coordination with agencies
6. LEA Point of Contact (POC)
7. DHR Point of Contact (POC)
8. Description of procedures to ensure Educational Stability
9. Best Interest Determination procedures
10. Transportation procedures
11. Dispute Resolution
12. Immediate Enrollment procedures

### Educational Stability Provisions:

- A child in foster care will remain in the **school of origin** unless a determination is made that it is not in the best interest of the child. "School of origin" is defined as the school in which a child is enrolled at the time of placement in foster care.
- If it is not in the child's best interest to remain in the school of origin, the child will be immediately enrolled in the new school, even if the child is unable to produce records normally required for enrollment, and
- The new/enrolling school immediately contacts the school of origin to obtain relevant academic and other records.

### LEA Requirements:

- Develop and implement clear written procedures governing transportation to maintain children in foster care in their school of origin when, in their best interest, that will be provided, arranged, and funded for the duration of the time in foster care; and
- Designate a Point of Contact (POC) if the corresponding child welfare agency notifies the LEA in writing that it has designated an employee to serve as a POC for the LEA.
- Enroll students in their new schools immediately when remaining in their school of origin is not in their best interest.

The LEA Foster Care Plan template below is available in the eGAP Document Library under the **Foster Care** heading.

#### Alabama Education Stability for Foster Students LEA Plan Template

| LEA Student in Foster Care Overview   |
|---|
| Number of Students in Foster Care SY 20__ - 20__ (Enrolled for Previous School Year):   |
| Number of Students in Foster Care SY 20__ - 20__ (Currently Enrolled):  |
| List Agencies in Collaboration:   |
| Policy Review and Revision (Describe how each agency in collaboration reviewed policies and the revisions made to policies as a result of reviews.) |
| Describe Collaboration and Coordination with Agencies (Include a list of team members, positions, signatures, and agencies.):                       |
| LEA(s) Point(s) of Contact:   |
| DHR(s) Point(s) of Contact:   |

|   |
|---|
| <p>2 C. F. R. §§ 200.331(d), 200.328(a); 34 C.F.R. §76.770; ESSA SECTION 1111(1)(e) - LEAs must implement the Title I educational stability requirements of children in foster care, including ensuring that:</p> <ul style="list-style-type: none"> <li>• A child in foster care remains in his or her school of origin, unless it is determined that remaining in the school of origin is not in that child's best interest;</li> <li>• If it is not in the child's best interest to stay in his or her school of origin the child is immediately enrolled in the new school even if the child is unable to produce records normally required for enrollment; and</li> <li>• That the new (enrolling) school immediately contacts the school of origin, to obtain relevant academic and other records.</li> </ul> <p>Describe procedures for implementing the above provisions.</p> |
| <p>ESSA Section 1111(g)(1)(E)(i) – A description of how the LEA in collaboration with the local child welfare agency will ensure that in determining whether it is in the child's best interest to remain in his or her school of origin, and LEA takes into consideration all factors relating to a child's best interest.</p> <p>Description of how the LEA will work with child welfare agencies to develop a clear policy or protocol on how to make best interest determinations including making every effort to gather meaningful input from relevant parties, in addition to required child welfare and school representatives, in deciding what school placement is in a child's best interest. Include a description of protocols in this description.</p>  |
| <p>ESSA Section 1112(c)(5)(B) Description of transportation protocols and procedures to include how additional costs for transportation will be calculated and funded as well as a policy for LEAs to resolve best interest disputes and interagency disputes related to transportation costs. Description must include how transportation and transportation costs will be monitored. (Include LEA and welfare responsibilities for providing transportation.)</p> <p>Description of Dispute Resolution Policy</p>   |
| <p>ESSA Section 111(g)(1)(E)(ii)-(iii) Describe protocol for a child in foster care to be immediately enrolled in a new school.</p>   |

## Best Interest Determination when Considering Education Stability for Students in Foster Care

### Factors to Consider

- Child's preference
- Views of the parents or the person with education decision-making rights
- Child's attachment to school and staff
- Placement of the child's siblings
- Availability and quality of services in the current and potential schools to meet the child's education and social/emotional needs
- School climate including safety
- History and impact of school transfers
- Length of the commute that might impact the child, based on the child's developmental stage
- Child's special needs and availability of required services in a school other than the school of origin
- Whether a child is an EL and is receiving language services and if those services are available in a school other than the school of origin

NOTE: Cost of transportation CANNOT be a factor in determining the child's best interest.

### **Possible Supporting Documentation**

- Report cards
- Progress reports
- Test scores
- Attendance data
- IEP or 504 Plan
- Emails from individuals consulted during the best interest determination process

### **Key Considerations**

- How will best interest decisions be made in a timely manner?
- How will best interest decisions be revisited if needed?
- How will accurate information be gathered in a timely manner to contribute to the best interest determination?
- Who should be involved or consulted about the decision? (LEA, DHR, child, foster parents, biological parents when appropriate, education decision-maker(s), other relatives for their perspective)

### **Reminders**

- Best interest determination should be consistent with the child's case plan.
- Cost of transportation cannot be a factor in determining the child's best interest.
- Consultations do not have to be in a face-to-face meeting.
- Consultations can take place via email or phone calls.
- Document all consultations.
- DHR has the final say in Best Interest Determination.

### **Immediate Enrollment:**

- A child in foster care should be enrolled in a new school as soon as possible in order to prevent educational discontinuity.
- Enrollment must not be denied or delayed for any population of students because documents normally required for enrollment have not been provided.
- Enrolling school must immediately contact a child's school of origin to obtain the relevant records and documentation, and the school of origin should immediately transfer records.

### **Transportation:**

LEAs must collaborate with Child Welfare Agencies to develop and implement clear written procedures for how transportation will be arranged, provided, and funded for the duration of a child's time in foster care.

### **Transportation procedures must:**

- Ensure that children in foster care needing transportation to the school of origin will promptly receive transportation in a cost-effective manner and in accordance with the child welfare agency's authority to use child welfare funding for school of origin transportation.

- Ensure that, if there are additional costs incurred in providing transportation to maintain children in foster care in their schools of origin, the LEA will provide transportation to the school of origin if:
  - ❖ the local child welfare agency agrees to reimburse the LEA for the cost of such transportation;
  - ❖ the LEA agrees to pay for the cost of such transportation; or
  - ❖ the LEA and the local child welfare agency agree to share the cost of such transportation.
- LEA must provide or arrange for adequate and appropriate transportation to and from the school of origin while any disputes are being resolved.
- DHR has the final say on transportation.
- Additional Costs related to transportation is defined as the difference between what an LEA otherwise would spend to transport a student to his or her assigned school and the cost of transporting a child in foster care to his/her school of origin.

Additional resources can be found at ALSDE website: <http://www.alsde.edu> in the Federal Programs Section of the Office of Student Learning.



## Additional Foster Care Resources

Alabama State Department of Education (2018). *Fostering connections*. Retrieved from <https://www.alsde.edu/sec/fp/Pages/titleprograms-all.aspx?navtext=Title%20Programs>

National Working Group on Foster Care and Education (April 2018). *Fostering success in education: National factsheet on the educational outcomes of children in foster care*. Retrieved from <https://foster-ed.org/fostering-success-in-education-national-factsheet-on-the-educational-outcomes-of-children-in-foster-care/>

U.S. Department of Education and U.S. Department of Health and Human Services (2016, June 23). *Non-Regulatory Guidance; Ensuring Educational Stability for Children in Foster Care*. Retrieved from <https://www2.ed.gov/policy/elsec/leg/essa/edhhsfostercarenonregulatorguide.pdf>

# Title I, Part A – Preschool

## Funding Preschools with Title I Dollars

Title I, Part A of the ESEA allows LEAs to provide preschool programs to improve educational outcomes for eligible children from birth to the age at which the LEA provides a free public elementary education. Title I funds can be used to fully fund a preschool program or be combined with other fund sources. Examples of other fund sources to coordinate programs include: First Class Alabama, Child Care Subsidy, Title I, IV, V (ESSA), Head Start, Special Education/Part B 619, and/Child Nutrition. The applicable preschool worksheet should be used to determine the maximum of Title I funds that can be used per classroom.

An LEA may serve preschool children who reside throughout the LEA and whom the LEA identifies as eligible because they are at risk of failing to meet the state's academic achievement standards when they reach school age, Section 1113(c)(5).

1. Use of funds is a local decision.
2. Use funds based on a school's needs assessment
3. Follow all federal requirements
4. Use the applicable preschool worksheets

LEAs must describe in the LEA Consolidated Plans, if applicable, how they will support, coordinate, and integrate Title I services with early childhood education programs at the LEA or school level, including plans for the transition of children to elementary school Sec. 1112(b)(8)). Each LEA receiving Title I funds must develop agreements and carry out coordination activities with Head Start agencies and, if feasible, other early childhood development programs (Sec. 1119(a) and (b)). See the sample agreement, which is included in this section.

Preschool programs in which federal funds are utilized must use multiple, educationally related, objective criteria to identify eligible students if all students cannot be served. Multiple criteria includes:

- Teacher judgment
- Parent interviews
- Developmentally appropriate measures of child development

A preschool program that is funded with federal dollars must administer a screener to determine the developmentally appropriate level of the preschoolers. The LEA may adopt a screener of their choice; however, the screener must be an evidence-based assessment. Documentation of the administration of the screener must be kept for monitoring purposes. Based upon the results of the screener, students should be rank ordered to ensure that the students with the greatest need are identified and placed. The list of rank ordered students should be available upon request and the criteria used should be uploaded into the eGAP document library. Included is a suggested list of evidence-based screeners that can be used as a part of the multiple criteria selection process. Title I funds can be used to purchase screeners. The ALSDE does not endorse any of the listed assessments. This is provided as a resource.



## Evidence-Based Screeners

1. ASQ-3 Ages and Stages
2. Batelle Developmental Inventory
3. Big Day for Pre-K Early Childhood Inventory
4. Boehm-3 Preschool
5. Bracken School Readiness Assessment
6. Brigance
7. Brigance Early Childhood Screener
8. Denver II
9. Developmental Assessment of Young Children
10. Developmental Assessment of Young Children (DAYC)
11. Developmental Indicators for the Assessment of Learning (DIAL 4)
12. Devereux Early Childhood Assessment Preschool Program (DECCA-P)
13. Early Screening Inventory (ESI-R)
14. Early Screening Profiles (ESP)
15. FirstSTEP
16. Gold Assessment
17. Learning Accomplishment Profile-Diagnostic Screens
18. Peabody Picture Vocabulary Test
19. San Diego Assessment
20. STAR Early Literacy

|   |  |
|---|--|
| <p><b>School Operated:</b></p>                                   | <p>A Title I school may use all or a portion of its Title I funds to operate a preschool program for eligible children.</p> <ol style="list-style-type: none"> <li>1. <b>Schoolwide Program:</b> If a school operates a preschool program in a schoolwide program school, all preschool children who reside in the school's attendance area are eligible to be served. A Title I school may operate a schoolwide program if a minimum of 40 percent of the students enrolled in the school or residing in the attendance area served by the school, are from low-income families. A Title I school with less than 40 percent poverty may request a waiver from the SEA to operate a schoolwide program. Guidance on schoolwide programs can be found in Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program.</li> <li>2. <b>Targeted Assistance Program:</b> A school may serve preschool children who reside in its attendance area and whom the school identifies as at risk of failing to meet the State's academic achievement standards when they reach school age.</li> </ol> |
| <p><b>District (LEA) Operated:</b></p>                           | <p>An LEA may reserve a portion of funds from its Title I allocation to operate a preschool program for eligible children in the LEA as a whole or in a portion of the LEA.</p> <ol style="list-style-type: none"> <li>1. <b>District (LEA) as a Whole:</b> An LEA may serve preschool children who reside throughout the LEA and whom the LEA identifies as eligible because they are at risk of failing to meet the State's academic achievement standards when they reach school age. An LEA may not use Title I funds to implement a preschool program throughout the district to benefit all preschool students in the LEA unless all the schools in the LEA are Title I schools operating schoolwide programs.</li> <li>2. <b>Portion of the District (LEA):</b> An LEA may serve preschool children who reside in specific Title I school attendance areas (e.g., its highest-poverty school attendance areas) served by some or all of its Title I schools if, for example, an LEA does not have sufficient Title I funds to operate a preschool program for the district as a whole.</li> </ol>     |
| <p><b>Coordination with Other Early Childhood Programs:</b></p>  | <p>An LEA or school may use Title I funds to improve the quality or extend the day or number of days of State preschool, Head Start, childcare, or other community-based early learning programs for eligible children. Title I funds may be used to provide preschool services for Title I eligible children who</p> <ul style="list-style-type: none"> <li>• are not eligible for Head Start services based on income requirements;</li> <li>• are eligible for Head Start but not served in a Head Start center due to unmet need;</li> <li>• are enrolled in a State preschool, Head Start, childcare, or community-based early learning program and are in need of additional services (e.g., extending the day, increasing number of days, etc.); or</li> <li>• would benefit from home visiting because they are most at risk of failing to meet the State's challenging academic standards.</li> </ul>   |



## Title I Preschool Documents and Worksheets

### **Agreement Between LEA with Head Start and/or Other Early Childhood Programs**

According to ESSA, each LEA receiving Title I funds, regardless of whether it operates a Title I preschool program, must develop agreements and carry out the following coordination activities with Head Start and, if feasible, other early childhood programs: **SEC. 1119(a)(b)(1)(2)(3)(4)(5)**

#### **AREAS OF COORDINATION AND COOPERATION**

The \_\_\_\_\_ Public Schools are required to:

- ☐ Develop and implement a systematic procedure for receiving records of preschool children
- ☐ Establish channels of communication between school staff and their counterparts to facilitate coordination
- ☐ Conduct meetings involving parents, kindergarten or elementary school teachers, and Head Start teachers to discuss the developmental and other needs of children
- ☐ Organize and participate in joint transition related training of school, Head Start, and where appropriate, other early childhood education program staff
- ☐ Link the educational services provided by the LEA with those provided by Head Start agencies

This agreement will be reviewed annually or as necessary. We, the undersigned, agree to follow this agreement for coordination and cooperation.

\_\_\_\_\_ Federal Programs Director

\_\_\_\_\_ Director of \_\_\_\_\_

\_\_\_\_\_ Contact Number

\_\_\_\_\_ Date

## Title I Preschool Worksheet

*This worksheet is to be used when Title I funds are solely funding a preschool unit/classroom.*

- A. Determine the total cost of the preschool unit (for example: teacher salary and benefits, materials and supplies, furniture, etc.). \$ \_\_\_\_\_ total cost of preschool unit/classroom
- B. Determine the class size per unit. # \_\_\_\_\_ class size per unit/classroom
- C. Divide the cost of preschool unit (**letter A**) by the class size (**letter B**).
- Cost of preschool unit (A) = \$ \_\_\_\_\_ amount of funds per child (letter C)  
Class size per unit (B)
- D. Multiply B & C. \$ \_\_\_\_\_ total Title I funds to be used

### Important Information

- Have you received an Excellence Grant from Department of Early Childhood in the amount of \$45,000 or less? \_\_\_\_yes \_\_\_\_no
- Is this an existing Title I fully funded classroom? \_\_\_\_yes \_\_\_\_no
- If you have answered **yes** to both of the questions, please indicate the amount of the Excellence Grant below. This amount will not be deducted from the total cost of the classroom.
- Excellence Grant amount \$ \_\_\_\_\_
- If you cannot service all of your Title I Eligible students, please upload the Multiple Criteria used to determine your most at-risk students.
- Please have the Rank Order list available upon request.

## Title I Combined Preschool Worksheet

**\*Complete this form only if you are combining Title I monies with other fund source(s).**

This worksheet is to determine the amount of funds to allocate for a preschool unit/classroom when other fund source(s) and Title I funds are combined. A worksheet should be completed for each preschool unit/classroom and completed by the federal programs coordinator.

Establishing channels of communication between school staff and other counterparts (including teachers, social workers, and health staff) in such Head Start agencies or other entities carrying out early childhood education programs, as appropriate, to facilitate coordination of programs. Section 1119 (b)(2) Examples of other fund sources to coordinate programs include: First Class Alabama, Child Care Subsidy, Title I, II, IV, V (ESSA) Head Start, Special Education/ Part B 619, and/or Child Nutrition.

- A.** Determine the total cost of the preschool unit (for example: teacher/aide salary and benefits, materials and supplies, furniture, etc.) \$ \_\_\_\_\_ total cost of preschool unit/classroom
- B.** Amount of state grant to fund unit/classroom (First Class Pre-K) \$ \_\_\_\_\_
- C.** Amount of other fund source(s) to fund unit/classroom \$ \_\_\_\_\_
- D.** Add (**letter B & letter C**) \$ \_\_\_\_\_
- E.** Subtract (**letter D from letter A**) (additional amount needed to fund classroom) \$ \_\_\_\_\_
- F.** Number of students per class # \_\_\_\_\_ students per class
- G.** Divide the cost of preschool unit (**letter A**) by the number students per class (**letter F**).  
\$ \_\_\_\_\_ amount of funds per child (PPA)
- H.** Divide (**letter D by letter G**) to get the number of students funded by state grant and/or other fund source(s).  
# \_\_\_\_\_ number of students funded (please drop all numbers after the decimal point...do not round up)
- I.** Determine the number of students to be selected using the Title I multiple criteria to expand an existing preschool unit/classroom (**subtract letter H from letter F**).  
# \_\_\_\_\_ selected using the Title I multiple criteria
- J.** Multiply the amount of funds per child (**letter G**) by the number of students to be selected using the Title I multiple criteria (**letter I**) to expand an existing preschool unit/classroom. (*This is the fair share of costs commensurate with the number of educationally at-risk Title I eligible children.*)  
\$ \_\_\_\_\_ amount of Title I funds allowable for this unit/classroom

### Important Information

- If you have received an Excellence Grant from the Department of Early Childhood in the amount of \$45,000 or less and this classroom is an existing fully-funded Title I classroom prior to receiving a grant, please use the Title I Preschool Worksheet.
- Please attach the Title I Multiple Criteria used to select students for each classroom unit.
- Please have the Rank Order list available upon request.

Revised August 26, 2019

## Additional Title I Preschool Resources

- eGAP Document Library
- <https://www.alsde.edu/sec/fp/Pages/preschoolall.aspx?navtext=Title%20I%20-%20Preschool>
- <https://children.alabama.gov/>
- <https://www2.ed.gov/policy/elsec/leg/essa/essaelguidance10202016.pdf>
- <https://www.nhsa.org/our-work/initiative/essa-toolkit>
- <https://ccsso.org/sites/default/files/2018-02/Toolkit-New%20Early%20Childhood%20Coordination%20Requirements%20in%20the%20ESSA-for%20pr....pdf>
- <https://www.naeyc.org/our-work/public-policy-advocacy/k-3-education#What%20does%20ESSA%20do,%20particularly%20with%20respect%20to%20early%20childhood%20education?>

# Title I, Part A – Parent and Family Engagement

## Purpose

The purpose of parental involvement under Title I, Part A is to promote active involvement among local educational agencies (LEAs), administrators, school staff, parents, family engagement coordinators or parent liaisons, community leaders, and other stakeholders working to improve student achievement and promote academic success. LEAs must ensure that strong strategies are in place to:

- Build capacity to involve parents/stakeholders in an effective partnership with the school.
- Share and support high student academic achievement.

Parental involvement has been a vital component of Title I in the Elementary and Secondary Education Act (ESEA) since it became law in 1965, but the term itself had never been defined until the 2001 reauthorization of the ESEA when amended by the No Child Left Behind (NCLB) Act. This amendment clarified the term parental involvement, as well as, lawfully established that parents are the key stakeholders in their children's education.

The definition of parental involvement can be found in Section 8101(39) of the ESSA and states:

- The term parental involvement means the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities, including and ensuring that:
  - Parents play an integral role in assisting their child's learning.
  - Parents are encouraged to be actively involved in their child's education at school.
  - Parents are full partners in their child's education and are included, when appropriate, in decision-making as well as being a part of the advisory committees to assist in the education of their child.
  - Other activities are carried out, such as those described in Section 1116.

This definition, in conjunction with other provisions in the ESSA, set the parameters by which State Educational Agencies (SEAs), LEAs, and schools must implement policies, programs, and procedures to involve parent(s) in Title I Programs (ED, 2004).

In 2004, the ED issued Parental Involvement: Title I, Part A Non-Regulatory Guidance to assist SEAs, LEAs, and schools in administering the parental involvement provisions of Title I, Part A of the ESEA. This guidance is not intended to be all-inclusive; rather, it answers questions about and clarifies aspects of the law that were brought to the attention of the U.S. Department of Education.

To learn more about Title I, Part A parental involvement and to read the non-regulatory guidance, please visit: <http://www2.ed.gov/programs/titleiparta/parentinvguid.doc>.

## **General SEA Responsibilities Under ESSA**

The Every Student Succeeds Act (ESSA) requires State Educational Agencies (SEAs) to involve parents and other stakeholders in the development of their plans for implementing federal law. The Department's plan was approved in January 2018 by the U.S. Department of Education. The ESSA allows SEAs to use the funds they reserve for the administration of Title I, Part A programs to meet their parent and family engagement responsibilities.

Such parent and family engagement responsibilities fall into three general categories:

1. Collecting and disseminating information to LEAs and schools regarding effective parent and family engagement practices
2. Providing technical assistance to, and monitoring the parent and family engagement policies and practices of LEAs and schools
3. Providing notice and information to parents regarding the education of their children

SEAs must ensure that LEAs and schools are made aware of effective parent and family engagement practices. Section 1111(g)(2)(F) of the ESSA states: "Each state plan shall describe how the SEA will support the collection and dissemination to LEAs and schools of effective parent and family engagement strategies including those included in the parent and family engagement policy under section 1116."

Thus, it is the responsibility of SEAs to ensure that LEAs and schools are kept abreast of effective parent and family engagement practices to increase the academic achievement of students and to lower existing barriers to parental participation.

In implementing parent and family engagement programs, activities, and procedures, SEAs, LEAs, and schools must comply with federal civil rights laws. Thus, SEAs, LEAs, and schools may not discriminate on the basis of race, color, national origin, sex, disability, or age, consistent with Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990 (ADA), and the Age Discrimination Act of 1975.

## **LEA Parent and Family Engagement Policy**

Each Local Educational Agency (LEA) that receives Title I funds must jointly develop, revise, and distribute to parents and family members of children receiving services a written parent and family engagement policy. The LEA parent and family engagement policy outlines how the district will implement programs, activities, and procedures for the engagement of parents in Title I programs. The policy will establish the district's expectations for parent and family engagement and how the district will carry out the parent and family engagement requirements.

## Local School Parent and Family Engagement Policy and School-Parent Compact

Each local school within an LEA who receives funds under Title I, Part A is required to jointly develop, revise, and distribute to parents and family members of children within the school a written parent and family engagement policy and a school-parent compact. For more information and templates, please visit the Family Engagement Section in the Document Library in eGAP.

## Allowable Uses of Funds for Parent and Family Engagement

Each school and LEA receiving assistance under Title I, Part A must ensure effective parent and family engagement to support a partnership among the school, the parents, the family, and the community to improve student academic achievement through training, information, and coordination activities.

1. Title I, Part A funds can be used to support the full range of family literacy activities, including parenting education and educational services for adults who need improved literacy skills in order to support their children's learning.
2. Literacy programs that bond families around reading and using the public library.
3. Providing information about the essential components of reading instruction to enable parents to support the instructional practices used by the teacher.
4. Training parents in the use of the Internet to enable teachers to access their children's homework; communicate with teaches; and review information posted about schools in improvement, supplemental educational services, public school choice, and other opportunities to promote student achievement.
5. Schools and LEAs must educate their staff in how to work with parents as equal partners.

## LEAs - Uses of Funds

ESSA specifies that the earmarked Title I dollars for district parent and family engagement must be spent on at least one of the following activities:

- Supporting schools and nonprofit organizations in providing professional development for LEA school personnel regarding parent and family engagement strategies, which may be provided jointly to teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, early childhood educators, and parents and family members.
- 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 best practices for increasing the engagement of economically disadvantaged parents and family members.
- Collaborating or providing subgrants to schools to enable such schools to collaborate with community-based or other organizations or employers with a record of success in improving and increasing parent and family engagement.
- Engaging in any other activities and strategies the LEA determines are appropriate and consistent with such agency's parent and family engagement policy.

## Parent and Family Engagement Worksheet

*This worksheet is to be used to determine the amount of funds to allocate for parent and family engagement from the Set-Asides page of the ESSA Consolidated Application in e-GAP.*

A. Enter the Title I, Part A allocation + any amount transferred in \$ \_\_\_\_\_

B. Multiply the amount from above by 1% \$ \_\_\_\_\_

*(If the amount listed is less than \$5000, you do not have to reserve any funds for Parent and family engagement, but you may choose to do so.)*

C. Multiply the above amount by 90% \$ \_\_\_\_\_  
*(This is the portion that must be distributed to schools.)*

D. Under ESSA, 10% of the 1% must stay at the district level. \$ \_\_\_\_\_

E. Enter the total number of students from low-income families in schools being served with Title I funds. This includes only public schools.

**Use Public Low-Income students on Building Eligibility Page in eGAP**

# \_\_\_\_\_

F. Divide the 90% portion by the number of low-income students recorded above. This will give you a per pupil amount to use to determine the allocation. Take this number out **four decimal places.**

\$ \_\_\_\_\_

G. Multiply the per pupil amount by the number of low-income students in each school to determine the school allocation for parent engagement. Round to the nearest cent.

| Title I School | # of Public Low-Income Students | Per Pupil Amount<br>(from above calculation) | Allocation for Parent Engagement (record this amount in the last column of the <b>School Allocation PPA List</b> of the Consolidated Application in e-GAP) |
|----------------|---------------------------------|--|--|
|                |                                 |  |  |
| TOTAL          |                                 |  | \$   |



## Schools - Allowable Uses of Funds

- Shall provide assistance to parents of children served by the school or LEA, in understanding such topics as the challenging State academic standards, State and local academic assessments, the requirement of this part, and how to monitor a child's progress and work with educators to improve the achievement of their children.
- Shall provide materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology (including education about the harms of copyright piracy) as appropriate, to foster parental involvement.
- Shall educate teachers, instructional support personnel, principals, other school staff, and school leaders, with the assistance of parents, in how to reach out to, communicate with, and work with parents as equal partners by implementing and coordinating parent programs and building ties between parents and the school.
- Shall coordinate and integrate parent involvement programs and activities with other Federal, State, and local programs, including public pre-school programs, and conduct other activities, such as resource centers to encourage and support parents in participating in the education of their children.
- Shall ensure the information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in a format and in a language the parents can understand.
- May involve parents in the development of training for teachers, principals, and other educators to improve the effectiveness of training.
- May provide necessary literacy training from funds received under this part if the local educational agency has exhausted all other available sources of funding for training.
- May pay reasonable and necessary expenses associated with local parental involvement activities, including transportation and childcare costs, to enable parents to participate school-related meeting and training sessions.
- May train parents to enhance the involvement of other parents.
- May arrange school meetings at a variety of times, or conduct in-home conferences between teachers or other educators, who work directly with participating children in order to maximize parental involvement and participation.
- May adopt and implement model approaches to improving parental involvement.
- Shall provide reasonable support for parental involvement activities under this section as parents may request.

## Parents Right to Know - Professional Qualifications

All schools must provide notification to all parents regarding their right to request teacher and paraprofessional qualifications. This parent right-to-know notification must be shared at the start of the school year.

# Title I, Part C – Migrant Children Education

## General Information

The Migrant Education Program (MEP) grew out of the *Elementary and Secondary Education Act*, Public Law 89-10, which was passed in 1965. Congress recognized migrant children as a disadvantaged group whose high mobility and unique lifestyles created severe educational needs. Some of these needs are different from those of other children and require special help and services for the children. For this reason, the MEP was established separately by an amendment to Title 1 in 1966. The law to continue the MEP has been reauthorized every five years since that time. The program is currently authorized under Title I, Part C, of the *Every Student Succeeds Act* (ESSA) which reauthorizes the *Elementary and Secondary Act* (ESEA).

## Mission Statement

The State of Alabama Migrant Education Program will provide leadership, technical assistance, and financial support to improve the educational opportunities and academic success of migrant children, youth, agricultural workers and fishers, and their families. The migrant program will make available academic and supportive services to the children of families who migrate to find work in the agricultural and fishing industries. The program will endeavor to support educators working with migrant children to eliminate barriers and provide continuity of education and encourage parents of the migratory lifestyle to support and assist their children in the educational process. The migrant education program recognizes that parent involvement is an essential part of the educational process and the home-school-community partnership is the first step in improving student achievement.

## What is the Migrant Education Program (MEP)?

The MEP is a national program that provides supplemental education and support services to eligible migrant children to help them overcome the educational disruptions and disadvantages they face. Alabama's children of migrant workers face myriad academic, health, and social problems due to their transient lifestyle. For many of them, English is a second, and sometimes third, language. The dropout rate is high. In many cases the migrant student also contributes to the family's economic well-being by working or by caring for younger brothers and sisters while the parents work.

## What is the Goal of the Migrant Education Program?

The goal of the MEP is to ensure that all migrant students reach challenging academic standards and graduate with a high school diploma or complete a GED that prepares them for responsible citizenship, further learning, and productive employment.

## Who are the Migrant Workers?

Migrant workers seek temporary or seasonal work in agriculture, fishing, or related industries, including food processing. They follow the growing seasons across the country and are largely responsible for the cultivating and harvesting of fruits, vegetables, and many other food products and are employed in food processing plants or in the fishing or logging industry. The migrant population is made up of diverse ethnic groups in Alabama. Hispanics make up the largest group with Asians and African Americans and other racial and ethnic groups completing the remainder of the migrant population.

## What Makes a Child Eligible for the Migrant Program?

To qualify for the program, a child must have moved due to economic necessity within the past three years across state lines or school district lines with a migrant parent, guardian, spouse, on his/her own, or with a member of the child's immediate family and have engaged or actively sought employment qualifying work. The child must not be older than 22 and has not received a high school diploma or GED. (Note: Children in the family ages 0 to 2 should be included on the Certificate of Eligibility unless the child was born in the district after the qualifying move. These children are enrolled as "Residency Only" (RO) individuals on the COE.)

## Why Give Special Help to Migrant Children?

Most school programs, including those supported by Title I, Part C, are set up on a nine-month academic calendar. However, when migrant children move with their families, their education— as well as their lives—is disrupted, often many times a year. Migrant children may come from large families with inadequate living space and low incomes. Poor nutrition, housing, and sanitary conditions may cause a high incidence of health problems. Migrant children may have limited-English skills and/or little experience with success at school. These problems, combined with irregular school attendance, often lead to overall frustration and low-academic performance, causing many migrant children to drop out of school in their teens. The families' frequent moves result in disrupted education and a lack of knowledge of other kinds of work. Migrant young people often face a high risk of unemployment or become part of the migrant labor force. However, these children can be helped to value education and to overcome their challenges. Through the MEP, they can attain an education and develop their skills and options for the future. In addition, the program helps them to develop self-confidence and self-esteem.

## What are the Laws Concerning School Enrollment and Attendance of Undocumented Children and Young Adults?

The U.S. Supreme Court has ruled in *Plyer v. Doe* [457 U.S. 202 (1982)] that undocumented children and young adults have the same right to attend public primary and secondary schools as do U.S. citizens and permanent residents. Like other children, undocumented students are obliged under state law to attend school until they reach age 17.

As a result of the Plyer ruling, public schools may not:

- Deny admission to a student during initial enrollment or at any other time on the basis of undocumented status.
- Treat a student disparately to determine residency.
- Engage in any practices to “chill” the right of access to school.
- Require students or parents to disclose or document their immigration status.
- Make inquiries of students or parents that may expose their undocumented status.
- Require social security numbers from all students, as this may expose undocumented status.

## Social Security Numbers for Migrant Students

Migrant students without social security numbers should be assigned a number generated by the school system. Adults without social security numbers who are applying for a free lunch and/or breakfast program on behalf of a migrant student need only indicate on the application that they do not have a social security number.

## Documentation of Free Meal Eligibility for Migrant Children

Migrant children in the LEA should be certified for free meals as promptly as possible. The LEA should accept a dated list with each migrant child’s name and the signature of the LEA’s migrant education coordinator in lieu of the free and reduced-price meal applications. Once documentation is obtained, the LEA must notify the household as soon as possible about the child’s free meal eligibility.

## Equity Statement

All children, without regard to status—e.g., *homeless*, *limited-English proficient*, *migrant*—will be provided a free and appropriate education, including equal and appropriate education opportunities and support services to enable them to achieve state and local content and achievement standards.

## Home-School Liaison (HSL) Roles & Responsibilities

A person hired as a migrant advocate or home-school liaison uses the resources of the home, school, and community to maximize the experience of schooling for eligible migrant students (ages 3-21) in the attainment of a high school diploma or its equivalent. The advocate assists in the identification, recruitment, and enrollment of eligible migrant students residing in the district and maintains communications between families and school. The suggested roles and the responsibilities of the home-school liaison are listed below.

### **Roles of the Home-School Liaison**

- Strives to make education a family affair.
- Works closely with parents to help migrant students overcome educational barriers.
- Assists parents in developing positive parenting skills that increase the amount and quality of time parents interact with their children.
- Enhances the readiness level of preschool-aged children who are unable to participate in programs such as Head Start or Even Start.
- Helps the family, as a whole, reach its goals for education and employment needs.
- Facilitates a stronger communication between parents and schools through adult education and parenting.
- Conducts interviews with the families (after recruitment) to set goals and assess their individual needs and strengths.
- Provides a home-based approach to support the family.
- Assists the migrant children to ensure that educational and educationally related needs are served.
- Selects children to be served based upon the “Priority of Service” criteria.

### **Responsibilities of the Home-School Liaison**

- Promotes the value of education by becoming personally acquainted with each migrant family and with the migrant children that have not graduated from high school.
- Presents personal identification as a representative of the school containing contact address or telephone number.
- Promotes the message that “my job is to help your children succeed in school.”
- Assists with school enrollment and proper grade placement.
- Facilitates access to any and all district, school, and community services or programs.
- Assists with access to appropriate add-on migrant programs when needs cannot be met by existing district/school programs.
- Secures or provides counseling services, in particular for potential dropouts.
- Identifies and retrieves dropouts.
- Assists with credit accrual.
- Assists with a migrant late entry or early withdrawal.
- Provides or secures tutorial services.
- Provides assistance with transitions from elementary to middle to high school.
- Secures postsecondary and scholarship information.
- Assists with the location of community resources.
- Attends training sessions sponsored by the Alabama State Department of Education Migrant Education Program.
- Promotes positive communication between home and school.

### **How Can the Home School-Liaison Assist Migrant Families?**

The home-school liaison should establish contact with migrant families quickly, as they may only be in the area for a short time. Recommendations for providing assistance to migrant families are listed below:

- Make personal contact since many migrant families do not have telephones and are more receptive to face-to-face communication.
- Plan home visits when both parents are available and be prepared to stay a while and to accept offers of food or drink.
- Be a valuable resource person by providing families with information about the program, as well as other services and programs available in the community.
- Be prepared to complete an informal needs assessment and make appropriate referrals.
- Offer to assist families in making initial contacts with schools and agencies, or in accessing needed resources, if they are new to the area.
- Help families build community support networks so that their children are able to attend school rather than miss valuable time in order to assist with family needs and business matters.
- Be aware that some parents are illiterate in their native language.
- Encourage parents to contact the home-school liaison with questions or needs, as they are generally proud people and would not want to be a burden.
- Be aware that many migrant parents consider their job to be feeding, clothing, and housing their children, and believe that the role of educating children lies with the schools.
- Enlist parents as partners in education, emphasizing their important roles as support systems, teachers, and role models.
- Understand that migrant parents may be uncomfortable in a school setting or trying to help their children, and that they consider educators to be the experts.
- Establish a personal relationship with migrant parents through home visits prior to inviting them to organized school functions.
- Consider scheduling home visits, parent meetings, or other activities, during evenings or times of the year when migrant workers are not working late.
- Extend invitations to older members of the immediate or extended family living in the home, as well as to the parents. Plan to offer transportation and babysitting and to have meeting activities translated.
- Stress the importance of educational continuity and provide families with information regarding the local school district's calendar, policies, and regulations.
- Provide parents with specific information about their child's progress in school and suggest ways parents or other family members can assist the child.
- Offer practical suggestions regarding appropriate bedtimes, study times, and the use of television.
- Be sensitive to the fact that difficulties with educational or disciplinary issues may be cause for great emotional displays within the family.
- Instill in migrant parents that they do have the right to question the educational system, and that their children will achieve more by having informed, involved parents.

- Recognize that some homes do not have access to educational resources. Provide the family with such resources and instructions for their use, when possible, in addition to introducing the family to free local resources such as the public library.
- Assist families who are seeking resources through use of the Internet and available agencies.
- Promote family literacy by making families aware of available literacy programs or providing family literacy activities in the home.
- Educate parents about appropriate child developmental stages and assist them with identifying concerns in this area.
- Recognize that some parents see physical or mental handicaps as acts of fate and may be reluctant to seek assistance for these conditions.
- Offer help discreetly to the family of a child who is poorly clothed or has personal hygiene problems. Many migrant homes do not have proper facilities and many children ready themselves for school in the morning.

## **Migrant Education Supplemental Services**

“Services” are those educational activities that directly benefit a migrant child by addressing the needs of a migrant child consistent with the comprehensive needs assessment and service delivery plan. The activities should be grounded in evidence-based research and enable the migrant program to meet its measurable outcomes and contribute to the achievement of Alabama’s performance standards.

### **What Are Some Examples of Allowable Activities That *DO NOT* Meet the Criteria for a Migrant Service?**

- Activities related to identification and recruitment
- Parental Involvement Meetings
- Program Evaluation
- Professional development
- Administration of the program
- Handing out leaflets to migrant families on available reading programs as part of an effort to increase the reading skills of migrant children

### **When Can Services Be Provided to Migrant Children?**

- Extended-day Programs
- Before and after school Programs
- In-home Instruction
- Saturday Programs
- Summer or Intersession Programs

### **What Services Can the Home-School Liaison Provide?**

- Supplemental academic programs to assist in the achievement of Alabama's academic standards
- Instructional training
- Health programs
- Preschool programs (readiness, transitioning to elementary education)
- Family home visiting, and academic counseling services
- Migrant student data and collection
- Student leadership opportunities
- Summer school programs
- Secondary credit accrual and exchange
- Grants for supplemental secondary services, dropout prevention, retrieval, and alternative education programs
- Dissemination of information related to available community services and opportunities.

### **What Instructional and Support Services Can the Home-School Liaison Provide?**

Instructional and support services for migrant children and their families may be provided in addition to academic services. Examples of these services are listed below:

- **Instructional Services** (e.g., educational activities for preschool-age children and instruction in elementary and secondary schools such as tutoring before and after school, in-home instruction, summer or intersession programs, or Saturday programs).
- **Support services** (e.g., educationally related activities, such as advocacy for migrant children, health, nutrition, social services for migrant families, necessary educational supplies, and transportation).

### **What Is a Summer Term?**

A summer term occurs only in a school or school system that operates under a traditional-calendar school year. (Year-round schools, for the migrant purpose, are not considered to have summer terms.) The summer term is the period of time when the regular term of the school year is not in session. (Note: There should be at least one day between the last day of school in the spring and the beginning of the migrant summer program.)

### **What Is an Intersession Term?**

For schools on a year-round calendar, an intersession term is one of the periods throughout the year when the school or school system (or part of the school) is not in session or does not provide academic instruction. Any break in the regular term of a year-round school is considered an intersession term, regardless of the season of the year in which it occurs.



## **Ideas for Provision of Migrant Services**

1. Summer Shared Reading Programs — Getting the family involved with books and stories. Schedule a family night visit to the local library during the summer.
2. Summer Instructional Program — Migrant students are invited to attend summer school at a selected site. A thematic, hands-on approach to instruction is used, with a focus on math, reading, science, and language.
3. Extended-Day Program — Before- and/or after-school programs to provide supplemental instruction designed to meet the specific needs of migrant children in Grades K-12.
4. Computer Labs — Open computer labs at the schools for migrant students to visit and work on credit classes they have failed in previous years.
5. Summer Institutes — Plan a summer institute for a six-week program at a local college.
6. Home-Based Instruction Program — Home-school liaisons provide reading material and educational workbooks for migrant students during the summer months. Plan at least two or three visits. On the first visit, deliver the age-appropriate educational materials to each child in the home and explain to the parents how to assist their child with the learning materials. Follow up with a second and third visit to check on the progress of the student and to provide any assistance needed by the parent.
7. *Motheread, Inc.* — Trained home-school liaisons provide a preschool curriculum for teaching literacy skills to adults and children.
8. Book Talk — Provides services to students attending summer school in small group reading sessions conducted by the home school Liaison. At the end of each session, each student is provided a copy of the book used in the reading session to take home and finish reading.
9. *Lightspan* — A take-home computer program that supports classroom and home implementation. This program supports the accelerated learning of migrant students.
10. Migrant Education Even Start — Designed to include parents in the education of their pre-school children.
11. Reading is Fundamental Book Distribution
12. Environmental/Outdoor Education
13. Grade 9 Transition Academy
14. Writing Skills Workshop
15. Career Awareness and/or Educational Fairs
16. Food Service (USDA Food Services Program) — The USDA program assists with food for summer programs for students who are eligible for free or reduced-priced breakfasts and lunches.
17. Basic Skill Development for Out-of-School Youth
18. Saturday School Classes — Classes emphasize English Language Development, reading, and writing skills. All of the family members can enjoy Saturday sessions of learning and fun.
19. Portable Assisted Study Sequence (PASS) — The PASS program is offered to high school migrant students in Grades 9-12 to provide an opportunity to “catch up on credits” by working with a teacher in individual units and then passing required exams. Students can receive necessary credits toward graduation.
20. Adult English as a Second Language Class.

21. Transportation — Support services to transport students who participate in migrant programs.
22. Referrals — Support services to provide referrals to other community agencies.

## **Summer Program Information**

### **Questions to Address When Planning for a Migrant Summer School**

- What is the target population? (Priority 1 and 2)
- How many students can be served?
- What are the best dates and times for the session(s)?
- What funds are available?
- What transportation issues must be resolved?
- Will instruction be remedial and/or enrichment?
- How will student progress be evaluated? (Pre/Post Tests)
- What are the target areas of instruction?
- How will the students be fed?
- How will the parents be involved?
- Will the program be of sufficient duration to ensure academic progress of the targeted population?

### **What Is a School-Based Summer Program?**

- Summer Program is located in a school building
- Must last a minimum of two weeks (10 days)
- Instructional funding often shared with other programs
- Coordinated and approved by district administrators

### **What Is a Home-Center-Based Summer Program?**

- Home-School Liaison works with students in or near the home
- Home-School Liaison sets up routes to serve the maximum number of students on each day's route

### **What Is a Special Summer Program?**

- Focuses on special topics or units: Space Camp, Computer Camp, Super Days, Family Days, 4H Camp, Summer Institutes, etc.
- May vary in the number of instructional days and hours

### **What Is a Combination-Based Program?**

- Includes a combination of some or all of the above summer school models

## Priority for Services

### **Tier 1: Priority for Services**

Migrant students who are failing or most at risk of failing to meet Alabama's challenging content and performance standards **AND** whose school year has been interrupted. *(All of the PFS students receive educational services as appropriate and available.)*

### **Tier 2: "At Risk"**

Migrant students who are failing or most at risk of failing to meet Alabama's challenging content and performance standards. *(These students are served if funding allows after Tier 1 students have been served.)*

### **Determining Failing or at Risk of Failing:**

- 1) Failing to meet state standards on *Alabama's State Assessments*. If no state assessment data is available (e.g., the child was not present in the district when the state assessment was administered, the state's assessment is not in place for a particular grade, the child attends school, but is too young to be included in the state assessment, then other relevant information should be used).
- 2) The student's academic grades are below average within the past 12 months.

**NOTE:** Other data/sources which could be examined to determine if the child is at risk of failing to meet Alabama's state standards are as follows:

- retention in grade
- below modal grade (older than the typical student in that grade),
- failed one or more courses in high school
- special education
- discipline incidents such as suspensions or expulsions
- chronic absenteeism or truancy
- limited English proficiency
- involvement in the juvenile justice system
- foster care
- pregnancy/teen parenthood
- reports of substance abuse
- teacher/staff reports of problems (e.g. academic, social, emotional, etc.)

### **Determining Educational Interruption**

"Educational interruption" means that a student in the preceding 12 months changed schools or missed a "significant" amount of school time (e.g., ten days or more) due to the child's or family's migrant lifestyle (a Qualifying Move or a move related to the migrant lifestyle). To determine the "educational interruption," first determine when the qualifying move was made. If the move was within the last 12 months, then the child has an interrupted school year.

### **Moves Into/From Other School Districts during the School Year**

If a migrant student is identified as a PFS student and moves into/from another school district during the school year, the student is still considered a PFS and should continue receiving extra educational services as appropriate and available. A migrant student once identified as PFS for the current school year could possibly be identified as PFS for the following school year if the interruption in education happened in the last 12 months and the criteria indicating that the student is at risk of failing are also met. Thus, a migrant student can be served as PFS for two school years in a row.

### **Out-of-School Youth Services**

The Migrant Education Program for *Out-of-School Youth* (OSY) includes emancipated youth and dropouts. The program is designed for young migrant adults who are not currently enrolled in school, who **are between the ages of 16 and 21** and have not graduated from high school or obtained a GED.

*Migrant young adults usually have many obstacles to overcome in order for them to continue their education. They may need support services such as – medical, dental, transportation to an educational site, and/or help in securing child care (if they are also parents of young children). Migrant young adults who are not attending school may be difficult to locate if they do not have younger brothers and sisters in the school system. Some have not had the opportunity to attend school or have very little schooling and do not speak English. Many migrant young adults, who have attended school in the United States, dropped out because of frequent moves due to work, poverty, and feelings of isolation in the schools they did attend. There have been four major barriers identified to completion of high school by migrant students: (1) economic necessity, (2) negative attitude schools have toward the migrant students, (3) complexity of curriculums and school requirements for graduation, and (4) limited access to many special education services due to the mobile lifestyles of migrants.*

The intent of the migrant program is to provide the resources available that meet their needs and to motivate them to pursue their education and options. Below are examples of services that may be provided to the ***Out-of-School Youth***:

- Educational and job training resources
- Assessment of needs
- Workshops and mini conferences relating to vocational and career programs;
- Academic and vocational counseling
- Early intervention and dropout prevention strategies and programs
- Referrals to educational programs and other agencies
- Urgent medical and dental services
- Emergency food and clothing
- Preschool programs for Out-of-School Youth with qualifying preschool children.

## Recommendations to Assist High School and Out-of-School Youth

- Conduct individual needs assessments on secondary in-school students in a timely manner to identify courses students are failing or in danger of failing.
- Increase parent support by making school a welcome environment for parents. Prepare materials in the parents' native languages.
- School counseling services on careers, job and college opportunities, postsecondary financial aid, scholarships, leadership conferences, etc.
- Involve students in school and community activities to foster a sense of belonging.
- Arrange tutoring for students who are failing or in danger of failing. This provides academic as well as emotional support.
- Introduce students to college early and often during high school.
- Make sure students are taking high school courses which will enable them to attend college.
- Provide tutoring for basic skills in reading, vocabulary, and other language skills.
- Credit deficient students and students who are failing should receive priority for migrant tutoring and school sponsored academic interventions.
- Students who leave school before graduation should be contacted and made aware of their options.

Many resources are available online at *osymigrant.org*. Included on this site are student friendly lessons and connections for OSY. Lessons include health information, workers' rights, financial information, state contact information as well as other useful and easy to access resources.

## What Are the Options for Out-of-School Youth?

For ***Out-of-School Youth*** who have left school prior to graduation, career education counseling must be accompanied by programs that provide training in basic literacy, English as a Second Language (when needed), and content area studies. Following is a brief description of some existing programs:

1. **Adult Basic Education** (ABE) — The goal of the Adult Basic Education (ABE) Program is to provide instruction in the basic skills of reading, writing, and mathematics to adult learners in order to prepare them for transitioning into the labor market or academic or vocational training.
2. **General Equivalency Diploma** (GED) — The GED Tests measure high school-level skills and knowledge. The GED credential offers adults a powerful second chance at attending college or pursuing a career.
3. **Portable Assisted Study Sequence** (PASS) — PASS is a program for students who did not wish to leave school, but who encountered severe difficulties in completing the course credits due to frequent moves. *PASS* provides units that may be completed independently or with the help of a tutor. Upon completion of a given course of study, the PASS sponsoring school issues high school credit.

## **How can you serve Out-of-School Youth?**

Listed below are additional ideas collected at the National ID&R Conference:

- Free physical referrals
- ESL teachers and classes
- Special housing
- Information regarding insurance (health, life, accident)
- Private funding foundation to meet insurance needs
- Laptop computers
- Provide sports equipment
- Identify places to play sports
- Meals on wheels
- Teach nutrition
- Survival skills class
- Directory of churches in the area
- Information regarding GED, Adult Classes, Vocational Training
- Counseling— academic and vocational
- Parenting skills classes
- Reading is Fundamental books
- Free books from Mexico
- Spanish/English Resource Guide
- Free materials from hospitals and churches
- Pesticide materials and information
- Personal Hygiene Items
- Towels
- AIDS Education
- Tapes and tape recorders with ESL materials, Spanish Dictionary
- Sunscreen, Chap Stick, UV protective sunglasses
- Gloves
- Backpacks
- Writing tablets, pens, pencils
- Blankets, Coats
- Connection information to Mexican Counsel
- Health Clinic Information
- Connection to job training agencies
- Childcare
- Invitation to serve on Parenting Committee
- Test in Spanish for proficiency to take GED in Spanish
- Needs Assessment
- Pocket Flashlight

### **What Are the Dropout Indicators for Migrant Students?**

- Grade retention and overage factors
- School interruption and poor attendance
- Lack of credit accrual
- Low academic performance
- Lack of participation in extracurricular activities
- Low teacher expectations
- Teenage parenthood
- Limited English proficiency (LEP)
- Lack of career planning
- Low self-esteem
- Lack of parental support for education

## **Migrant Parents**

### **How Can the Home-School Liaison Help Migrant Parents?**

- At the start of school, hold an in-school session to have parent(s) complete forms. Translators should be available. This is a good opportunity to share information on school supplies and other expectations and enlist parents and guardians as school/classroom volunteers.
- When assisting family members with little or no English proficiency, providing forms and notes in their native language is very helpful. When translating, caution should be taken to ensure that the correct phrases are used. When using district translators, accuracy, due to dialect, is sometimes an issue. Some translators do a great job of oral translations, but their translation of written material may not be proficient.
- Arrange for parent-teacher conferences at times that are convenient for parents. Many parents of migrant students may work evening shifts. Make sure that you send home conference notices in the home language and tell them that translators will be on-hand. Follow-up with a telephone call in the home language in case parent(s) are not able to read.
- Schedule parent-teacher conferences so that parents can make one trip to the school covering all their children's conferences.
- Parent nights are a useful way to engage family members in school activities. When organizing parent events, it is helpful to keep the following in mind:
  1. Involve your migrant students as part of the program to encourage family member attendance.
  2. Send home bilingual notes announcing parent nights. In addition, personal contact with families is also beneficial.
  3. Greet and say good-bye to all attending families.
  4. Celebrate the achievements of outstanding migrant students.
  5. Survey those attending, asking for input on student programming, adult programming, and satisfaction with the current programming efforts.

- To build rapport between the parents and teachers, parents could be asked if they would be willing to give lessons on ethnic dancing or music or cooking popular ethnic recipes.
- Gain an understanding of the community needs that the immigrant families have. Non-English-speaking families need community support mechanisms. It is helpful to find someone within the community to mentor the new families.
- Community support involves being aware of the following: health services, shopping, basic living tips, migrant services, and translator services. Besides identifying service providers, school staff can help the families get to know them as well.
- A district with significant immigrant populations might involve other community organizations, such as a YMCA, in after-school activities.

### **Important Messages the HSL Can Share with Parents**

- You are your child's first and most important teacher.
- As you move from one district to another, take all-important papers with you to enroll your children in school. You will need birth certificates, most recent report cards, shot records, and proof of address.
- Encourage your children to do well in school.
- Show them that you are interested in what they learn.
- Make sure they are attending school every day.
- Meet with your children's teachers. Discuss with them how you can help your child at home.
- Attend parent-teacher conferences and special events at the school.
- Join a Parent Advisory Council (PAC) or Parent Teachers Association (PTA). In PAC and PTA meetings, you will meet people who share your special concerns.
- Your attitude toward school attendance sets the tone of your child's attitude. Be positive.
- Regardless of your child's age, set a regular bedtime and/or curfew. The proper amount of sleep helps avoid "sleeping late."
- Allow plenty of time for getting ready in the mornings.
- Provide an alternate plan for getting your child to school on time if the bus or ride is missed in spite of your best efforts.
- Make every possible effort to schedule doctor, dentist, and other appointments before and after school hours.
- When you must schedule appointments during the school day, try to stagger them so that your child does not miss the same class every time.
- If your child must be out of school for an appointment, make every effort to get her/him back to school for at least part of the school day.
- Refuse to view tardiness as acceptable behavior.
- Refuse to write excuses for anything other than a legitimate absence.
- Discourage early checkouts.
- Talk to your child about responsibility and the need to develop good work habits and positive attitudes now.
- Plan family vacations in accordance with the school calendar as much as possible.
- If you know in advance that your child must be absent, notify his/her teacher(s) and make sure that your child understands her/his responsibility for making up work that is missed.



- If your child is a teenager who drives to school, make him/her accountable for attendance.
- Do not send a sick child to school.

## Migrant Preschoolers

### **How may MEP services to migrant preschools be delivered?**

- Home-based
- School-based

## “End of Eligibility” for Migrant Students

Migrant Eligibility Terminates in One of the Three Ways Listed Below:

1. Three years from the last qualifying arrival date.
2. The student graduates from high school or receives a GED.
3. The student turns age 22.

**Guidelines for withdrawing a student whose eligibility ends:** A migrant child’s eligibility ends three years from the date of the **“Qualifying Arrival Date.”** The student is withdrawn one day prior to the end of eligibility (EOE) date. A migrant student who turns age 22 is withdrawn one day prior to his/her 22nd birthday.

### **Continuation of Services**

Under Section 1304(e) (2), children who cease to be eligible for migrant services may be served for one additional year if **comparable services** are not available through other programs. Section 1304(e) (3) allows continuation of services to secondary students who were eligible for services in secondary school through **credit accrual** programs until graduation. Students who receive “continuation of services” are not counted in child count since they do not meet the definition of a “migratory child.”

**NOTE:** After a student has reached the “end of eligibility,” he/she is no longer eligible for migrant services until a **new** qualifying move is made. (See exception — Continuation of Services)

### **Enrollment Dates for the Certificate of Eligibility**

The COE enroll date will be the date the student is recruited and the COE is signed.

### **Grade Promotions**

Grade promotions occur at the beginning of the fall term. For the purposes of summer migrant programs, the migrant child is considered in the grade he/she completed in the spring.

## Migrant Enrollment Types

| Enroll Type               | Time Frame   | Age/Grade Level  | Code |
|---------------------------|--|--|------|
| <i>Regular</i>            | Typically<br>August through May<br>(Regular School Year) | <b>K-12</b><br>Served in the Migrant Program with<br>Migrant Funds   | RE   |
| <i>Regular</i>            | Typically<br>August through May<br>(Regular School Year) | <b>Ages 3-5</b><br>Housed and Served in a Title I<br>School and part of the Title I Plan<br>and Served with Migrant Funds<br>(Few Schools)   | RE   |
| <i>Participating</i>      | Typically<br>August through May<br>(Regular School Year) | <b>Ages 3-5</b><br>Served through the Migrant<br>Education Program/Head Start/Even<br>Start, etc. with Migrant Funds<br><b>Ages 16-21</b><br>Out-of-School Youth and<br>Dropouts Served through Adult<br>Literacy Programs with Migrant<br>Funds | PA   |
| <i>Summer</i>             | Typically<br>June through July                           | <b>K-12</b><br>Served in the Migrant Program with<br>Migrant Funds   | SU   |
| <i>Summer</i>             | Typically<br>June through July                           | <b>Ages 3-5</b><br>Served in the Summer with Migrant<br>Funds  | SU   |
| <i>Summer</i>             | Typically<br>June through July                           | <b>Ages 16-21</b><br>Out-of-School Youth or Dropouts<br>Served through Adult Literacy<br>Programs with Migrant Funds   | SU   |
| <i>Residency<br/>Only</i> | Anytime of the Year                                      | <b>Ages P0-P2</b><br>All<br><b>Ages P3-P6</b><br>Not served with Migrant Funds<br><b>Ages 16-21</b><br>Out-of-School Youth and Dropouts<br>who are not served through Adult<br>Literacy Programs with Migrant<br>Funds                           | RO   |

## What Should the Home Liaison Expect from the State Department of Education?

- Training
- Site Visits
- Assistance with Recruitment and Recruitment Questions
- MIS2000 Assistance
- MIS2000 Data Entry Assistance
- Re-Interviews of Migrant Families as Required
- Assistance with the selection of materials for use with migrant students and parents
- Assistance with other MEP questions and issues

## Collaboration between Migrant and Homeless Education Staff

Collaboration between Migrant and Homeless Education Staff is critical to the determination of McKinney-Vento eligibility and provision of services to mobile migrant children and youth. This includes the collaboration between migrant education recruiters or home-school consultants and local homeless education liaisons at the regional or school district level. On the state level, migrant education directors and homeless education coordinators collaborate as well.

### **Migrant education staff can provide the following to homeless education liaisons:**

- Insights on the work patterns of local migrant communities.
- Understanding of education, health, emotional or social needs unique to migrant children.
- Locations of migrant camps and communities.
- Contact and communication with migrant families (in the native language when necessary) whose children may need educational services provided by the *McKinney-Vento Act* (e.g., students who are barred from enrolling while awaiting an immunization record or students who are denied entry because they do not have proof of residency or guardianship).
- Contact and communication with migrant employers that may result in their cooperation with identifying children who may be covered by the Act and in posting notices of rights under the *McKinney-Vento Act*.

### **Local homeless education liaisons can provide the following to migrant education recruiters and home-school consultants:**

- Understanding of the provisions of the *McKinney-Vento Act* and ways it may be used to provide services to migrant children identified as eligible.
- Assistance with integrating migrant children into the public-school system and accessing federal, state, school district, and community resources, including services through Title IA funds reserved for students experiencing homelessness.

**At the state level, migrant directors and homeless coordinators should work together to:**

- Review and revise policies that may serve as barriers to both migrant and homeless students.
- Establish educational policies that will meet the needs of both populations
- Communicate these policies to regional and school district staff and ensure that policy notices are communicated to staff responsible for enrolling students, (e.g., school secretaries and counselors).
- Require and facilitate collaboration between regional and school district migrant and homeless education staff that results in targeting resources to students most in need.

## **Procedures and Forms**

### Alabama State Department of Education Parent/Employment Survey Form Completion and Collection Procedures for Systems **Not** Receiving Migrant Funding

1. All school districts are required to collect a Parent Survey from all enrolling students. Enrolling students include all students entering kindergarten and any new student enrolling in your school district. If a student enrolls in a school district anytime during the year, this survey must be completed as part of the enrollment process.
2. The Parent Survey is posted in the Document Library in eGAP in the Title I, Part C, Education of Migratory Students section. This form is the most current form and **must** be used by every school district. The state is required to have a uniform Parent Survey for use statewide, so the form may not be included as part of another document or altered from the document posted in any way.
3. Individual schools should collect the survey forms, count them, and send them to a designated person at the Central Office. The LEA should have them available for collection in the fall (August/September) and again in the spring (April) for students enrolling during the school year.
4. The SDE representative picking up the forms will take all the forms from the LEA and leave a signed statement indicating the date and total number of Parent Surveys collected. The number of surveys collected should be the number of kindergarteners plus the number of new students enrolled in the school district. (ex. 625 kindergartners + 75 new students = 700 completed surveys to be collected)
5. None of the collected Parent Survey Forms will be returned to the LEA. The Verification Form left with the LEA is needed to show compliance with the policies and procedures for the Parent Surveys. This form should be kept on file with the LEA and available during monitoring by either state or federal representatives.

6. The state will then process the surveys and make a determination concerning a student's possible migrant eligibility status. The state will then code the student as migrant in the student database.

**Note: There is no need to retain a copy of these forms for your records.** They are strictly for use by the State of Alabama, Migrant Education Program. If your LEA is not contacted by a state representative for Survey collection, please contact the State Department of Education's Migrant Education Coordinator.

Alabama State Department of Education  
Parent Survey Form Completion and Collection Procedures  
for Systems **Receiving** Migrant Funding

1. All school districts are required to collect a Parent/Employment Survey from all enrolling students. Enrolling students include all students entering kindergarten and any new student enrolling in your school district. If a student enrolls in your school district anytime during the year, this survey must be completed as part of the enrollment process.
2. The state has a Parent Survey posted in the Document Library in eGAP and this form is the form that must be used. The state is required to have a uniform Parent Survey for use statewide, so the form may not be included as part of another document or altered from the document posted in any way. No electronic version is available and no electronic version will be accepted.
3. Individual schools should collect the forms in September and April, count them, and send them to a designated person at the Central Office.
4. Once the surveys have been collected from every school, the LEA should separate the forms into two stacks: (a) one stack will contain the forms that are marked "No." The LEA will hold these forms for collection by the Regional Migrant Coordinator. This collection will take place during the months of September and April and (b) the second stack will be the forms marked "Yes." These forms will be retained at the district level for recruitment purposes.
5. None of the collected Employment Survey Forms will be returned to the LEA. The Verification Form left with the LEA is all that will be needed to show compliance with the policies and procedures for the Employment Surveys. This form should be kept on file with the LEA and available during monitoring by either state or federal representatives.
6. Migrant recruiters will use the forms marked "Yes" to recruit and make determinations concerning a student's possible migrant status. Any new Certificates of Eligibility (COE) completed will be submitted for approval by the ALSDE. The State will then code the student as migrant in the student database.

**Alabama State Migrant Education Program (MEP)  
Supplemental Services – Codes and Descriptions**

***In order for any of these activities to be checked on the Supplemental Services List, the service should be either fully funded or funded in part by the migrant program, or the activity should be provided by migrant staff.***

| SUPPLEMENTAL SERVICE<br>CODE # AND TITLE     | DESCRIPTION   |
|--|---|
| <b>102 – READING</b>                         | <b>Instruction in reading for an individual student and/or group of students.</b> In order for this service to be a migrant service, it must be funded fully or in part by the migrant program. For example, a teacher paid by the MEP can perform this service or the MEP can pay for the migrant student to attend summer school, extended day, or other programs designed to meet the reading needs of students. <i>This instruction must be delivered by a certified teacher.</i> |
| <b>103 – MATH</b>                            | <b>Instruction in math for an individual student and/or group of students.</b> In order for this service to be a migrant service, it must be funded fully or in part by the MEP. For example, a teacher paid by the MEP can perform this service or the MEP can pay for the migrant student to attend summer school, extended day, or other programs designed to meet the math needs of students. <i>This instruction must be delivered by a certified teacher.</i>                   |
| <b>104 – GENERAL TUTORIAL</b>                | <b>Supplemental instructional assistance provided.</b> This supplemental instruction such as homework assistance can be provided by a teacher or paraprofessional employed by the MEP. It can also be provided in extended day, summer school or in situations where the MEP pays part or all of the tuition or fees for the migrant student.   |
| <b>105 – PRESCHOOL<br/>(SITE-BASED)</b>      | <b>Developmental services for pre-kindergarten children (ages 3 to 5) in a formal setting such as a school.</b> These services can be provided through play school, pre-kindergarten, and head start programs.  |
| <b>106 – PRESCHOOL<br/>(HOME-BASED)</b>      | <b>Developmental instruction provided to pre-kindergarten children (ages 3 to 5 years) and their parents in their homes.</b> These services are provided by the home-school liaison using a program such as “Motherhead” or a state- approved pre-school program. They are provided in the homes of identified migrant families with MEP funding.   |
| <b>107 – VOCATIONAL/CAREER<br/>EDUCATION</b> | <b>Vocational-</b> <i>This service should be provided by a certified professional and is instruction designed to provide training skills that are required for gainful employment in a skilled or technical occupation.</i><br><b>Career Education-</b> <i>These are services designed to provide an awareness of career options, work values, work seeking, and work-getting skills delivered by a certified professional.</i>   |

|   |  |
|---|--|
| <b>108- GUIDANCE/<br/>COUNSELING</b>          | <p><b>Activities that provide advisement to students and/or parents in order to enhance educational or personal development, prevent life problems, or handle personal crisis situations-</b></p> <p><i>Guidance and counseling services should be provided by a certified professional who will provide advisement in areas related to goal setting, health issues, careers, and postsecondary options to both individuals and/or groups of students. This service can only be counted as a supplemental service if the counselor is funded by the MEP or if fees for the service are provided through the MEP.</i></p> |
| <b>109 – SOCIAL SERVICES/<br/>ADVOCACY</b>    | <p><b>Coordination, referral, and linkage with other agencies or school services to ensure that children receive available services</b> – Examples of this service are securing emergency food and clothing for students, translation of school forms, interpretation for parent-teacher conferences, school-home linkage/visits, social service referrals, arranging for health or dental visits, and referring students to other educational programs such as Head Start, Even Start, and Pre-K. These services may be provided by the home-school liaison and/or migrant recruiter.</p>                               |
| <b>110 – GED</b>                              | <p><b>Coordination, referral, and successful placement in GED classes</b> – No migrant funds need be expended for this to be a migrant-funded process if migrant staff is involved in the process.</p>   |
| <b>111 – HEALTH SERVICES<br/>REFERRAL</b>     | <p><b>Immunizations, screenings, and medical appointments</b> – The home-school liaison/migrant recruiter can help parents set up these services. The staff may even provide city or county transportation if such is available. It is not advisable to use a personal vehicle for transporting students or parents. This service can be used as migrant activities since migrant staff is involved in the process.</p>  |
| <b>112 – PUPIL<br/>TRANSPORTATION</b>         | <p><b>Transporting students to and from school activities</b> – This service can be either between school and home, on field trips related to school activities, or the provision of support services such as rides to the doctor (see above as per personal vehicles). If these services are provided by migrant staff and/or funded either fully or in part by the MEP, they are considered migrant funded.</p>  |
| <b>113 – NEEDS ASSESSMENT</b>                 | <p><b>An assessment of the needs of enrolled migrant students</b> – The needs assessment is a system responsibility and should be conducted annually for the regular school year and in the summer for students attending summer school. Migrant staff must be involved in the process if the service is checked as a migrant supplemental service.</p>  |
| <b>114 – STUDENT SERVICES/<br/>ENROLLMENT</b> | <p><b>Assisting students and/or parents in enrollment activities at the schools</b> – In order for this to be a MEP activity, migrant personnel must assist the student and/or parent during enrollment in school by helping fill out papers, interpreting, and translating.</p>   |

|  |   |
|--|---|
| <b>115 – DISTANCE LEARNING</b>         | <b>Distance learning via internet</b> – Several schools in Alabama are piloting a distance learning program; however, even if your system is participating in this pilot, the funding must be provided by the MEP in order for the service to be considered a migrant funded supplemental service.  |
| <b>116 – TRANSLATION/ INTERPRETING</b> | <b>Translating and interpreting services for migrant families</b> – These services may be provided by the home-school liaison and/or the migrant recruiter. Translating and interpreting should relate mostly to school activities. Translating personal and legal papers should be kept to a minimum.  |
| <b>117 – ELL</b>                       | <b>Instruction adapted to English language proficiency of students and to helping students master the English language skills of listening, speaking, reading, and writing</b> – This instruction should be conducted by certified personnel. This service can only be counted as a supplemental service if the teacher is funded by the migrant program or if fees for the service are provided through the migrant program.   |
| <b>118 – ENRICHMENT ACTIVITIES</b>     | <b>Activities designed to help create a background of experience for migrant students</b> – These activities will include field trips, unusual subject matter activities, computer skills, art and music activities, etc. If this service is provided by migrant staff or migrant funds were used to fund the activities for migrant students, this service can be checked as a supplemental service.   |
| <b>119 – SCHOOL SUPPLIES</b>           | <b>Purchasing school supplies for migrant students</b> – This item should be checked when <b>migrant funds</b> are used by the school system to purchase school supplies for eligible migrant children.   |
| <b>120 – HS CREDIT ACCURAL</b>         | <b>Assisting students in passing course in high school so that they will have enough credits to pass to the next grade</b> – These activities should be conducted by certified personnel and may include in-school tutoring, after-school tutoring, or any activity that will assist students in passing courses (especially core courses) that will ensure they have enough credit to pass to the next grade. Students in ninth grade should be the main focus of this effort, but all students in Grades 9-12 should be included. |



# Title I, Part D – Neglected or Delinquent Children Programs

## General Information

The Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk, authorized by Title I, Part D of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the No Child Left Behind Act of 2001 (20 USC 6421 et seq.) include two programs, one for State programs and another for local programs:

1. Subpart I establishes the State agency Neglected or Delinquent (N or D) program, through which ED provides Federal financial assistance to State educational agencies (SEAs) to enable them to award subgrants to State agencies (SAs) that operate educational programs for children and youth in institutions or community day programs for children who are neglected, delinquent and at-risk and for children and youth in adult correctional facilities.
2. Subpart II authorizes ED to award grants to SEAs to enable them to award subgrants to local educational agencies (LEAs) to provide programs that serve children and youth who are in locally operated correctional facilities or are attending community day programs for delinquent children and youth. Additionally, Subpart II programs may provide assistance to children and youth who are neglected or at-risk of dropping out of school.

## Purpose of Title I, Part D Statute

1. To improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging State academic content standards and challenging State student academic achievement standards that all children in the State are expected to meet;
2. To provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment; and
3. To prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education.

## Title I, Part D, Subpart I

Under SEA programs (Title I, Part D, Subpart I), States receive formula funds based on the number of children in State-operated institutions and per-pupil educational expenditures. Each State's allocation is generated by child counts in State juvenile institutions that provide at least 20 hours of instruction from nonfederal funds and adult correctional institutions that provide 15 hours of instruction a week. The SEA then makes subgrants to State agencies based on their proportional share of the State's adjusted enrollment count of neglected or delinquent children and youth.

## Title I, Part D, Subpart II

Under local agency programs (Title I, Part D, Subpart II), the SEA Awards subgrants to districts with high numbers or percentages of children and youth in locally operated juvenile correctional facilities, including facilities involved in community day programs.

## Title I Part D, Uses of Funds, Subpart I

Projects may use Subpart 1 funds to pay the necessary and reasonable costs that provide a variety of services, including reading, mathematics, language arts, and vocationally oriented programs that include academic classroom instruction so long as these are supplementary services and materials. For example, past Subpart I projects have used funds to:

- Hire additional teachers, aides, educational counselors, and other staff members to provide additional instruction in areas of greatest need;
- Train teachers, aides, and other staff members who are actively involved in providing Title I services;
- Procure needed educational materials and equipment for Title I instruction, including books, computers, audiovisual equipment and supplies, and classroom materials for industrial arts and vocational training; and
- Hire transition coordinators or buy new equipment to assist students' transitions (e.g., purchasing scanners to scan individualized education program (IEP) documents).

## Title I Part D, Uses of Funds, Subpart II

- To carry out high-quality education programs that prepare children and youth to complete high school, enter training or employment programs, or further their education;
- To provide activities that facilitate the transition of such children and youth from the correctional program in an institution to further education or employment; and
- To operate dropout prevention programs in local schools for children and youth who are at-risk of dropping out or youth returning from correctional facilities.
- Dropout prevention programs that serve at-risk children and youth. An at-risk child or youth means a school-aged individual who is at-risk of academic failure, has a drug or alcohol problem, is pregnant or is a parent, has previously come into contact with the juvenile justice system, is at least one year behind the expected grade level for the age of the individual, is a migrant or an immigrant, has limited English proficiency, is a gang member, has previously dropped out of school, or has a high absenteeism rate at school.
- Coordination of health and social services for children and youth who are at-risk (e.g., day care, drug and/or alcohol abuse counseling and mental health services) if there is a likelihood that providing such services will help these children complete their education.
- Special programs that meet the unique academic needs of children and youth who are at-risk, including vocational and technical education, special education, career counseling, curriculum-based entrepreneurship education and assistance in securing of student loans or grants for postsecondary education.
- Programs providing mentoring and peer mediation.

## Monitoring for Title I, Part D

Title I, Part D (Part D)-funded programs are monitored to ensure compliance with applicable State and Federal laws, including the Elementary and Secondary Education Act (ESEA), as amended in 2015. Monitoring reviews occur at three levels:

- The U.S. Department of Education (ED) monitors State education agencies (SEAs) that receive funds (Federal monitoring);
- SEAs monitor their State agency (SA) and local educational agency (LEA) subgrantees (subgrantee monitoring); and
- SA and LEA subgrantees monitor the facilities and programs to which they allocate funds (facility monitoring).

## Consolidated State Performance Report (CSPR)

The Consolidated State Performance Report (CSPR) is a data collection instrument administered by the U.S. Department of Education's (ED) Office of Elementary and Secondary Education on an annual basis. All States that receive Title I, Part D, funding for the related school year must respond to the reporting requirements in the CSPR.

The purpose of the CSPR is to collect program data that ED can use to demonstrate the effectiveness of Title I, Part D, programs in relation to the progress students are making regarding academic, vocational, and transition outcomes. States may also use their own CSPR data for self-assessment and decision-making purposes. Measures collected in the CSPR for the State agency (Subpart I) and the local agency (Subpart II) programs are the same and focus on four areas:

- Student and facility counts
- Demographics (race/ethnicity, age, and gender)
- Academic and vocational outcomes
- Academic performance in reading and mathematics

## Annual Count

The ED requires an annual report of children in institutions for Neglected or Delinquent Children, Adult Correctional Institutions, and Community Day Programs. It is sometimes referred to as the “Annual Count” or the “October Count”. The annual count collects:

- The number of children 20 years of age or younger enrolled in a “regular program of instruction” <sup>1</sup>
- The number of children and youth 5 to 17 years of age residing in local institutions for delinquent children and youth or in local adult correctional facilities (Local educational agency count).

The ED uses this information to determine the amount of funding allocated annually to States under the Title I, Part D, Subpart II program.

ALSDE sends out information to the LEAs regarding the annual count in September of each year.

## Annual Count Requirements Checklists

| Included or Confirmed?                 | Element   | Notes |
|--|---|-------|
| <b>State Agency Count Requirements</b> |   |       |
| <b>SA Eligibility</b>                  |   |       |
| <input type="checkbox"/>               | SA is responsible for providing free public education to children and youth who are in N or D institutions, community day programs, or adult correctional institutions.   |       |
| <b>Facility Eligibility</b>            |   |       |
| <input type="checkbox"/>               | Facilities or community day programs that are participating in the count serve children and youth who are N or D.   |       |
| <input type="checkbox"/>               | Facilities or community day programs have an average length of stay of at least 30 days.  |       |
| <b>Count Window</b>                    |   |       |
| <input type="checkbox"/>               | Children and youth are counted on the appropriate day—one day during the calendar year other than a weekend or holiday.   |       |
| <input type="checkbox"/>               | Facilities under an SA count children and youth on the same selected date.  |       |
| <b>Child or Youth Eligibility</b>      |   |       |
| <input type="checkbox"/>               | Children and youth are 20 years of age or younger on the day of the count.  |       |
| <input type="checkbox"/>               | Children and youth are enrolled in State-funded <i>regular program of instruction</i> <sup>1</sup> for at least (a) 15 hours per week in an adult facility or (b) 20 hours per week in a delinquent institution or community day program on the day of the count. |       |
| <input type="checkbox"/>               | <i>Enter other requirements here, if needed.</i>  |       |

<sup>1</sup> “Regular program of instruction” means an educational program (not beyond grade 12) in an institution or a community day program for children or youth who are N or D that consists of classroom instruction in basic school subjects such as reading, mathematics, and vocationally oriented subjects, and that is supported by non-Federal funds. Neither the manufacture of goods within the institution nor any activity related to institutional maintenance is considered classroom instruction.

| Included or Confirmed?                             | Element  | Notes |
|--|--|-------|
| <b>Local Educational Agency Count Requirements</b> |  |       |
| <b>LEA Eligibility</b>                             |  |       |
| <input type="checkbox"/>                           | LEA serves children and youth in locally operated N or D facilities (i.e., not funded by the State), including public or private institutions.   |       |
| <b>Facility Eligibility</b>                        |  |       |
| <input type="checkbox"/>                           | Locally operated facilities meet the definition of an institution for children who are neglected, an institution for children who are delinquent, or an adult correctional institution. <i>Note: Facilities need not have a 30-day average length of stay.</i> |       |
| <input type="checkbox"/>                           | Facilities are designated properly as either a neglect or delinquent institution.  |       |
| <input type="checkbox"/>                           | Facilities counted properly according to their designation (i.e., delinquent institution counted all children who are neglected or delinquent as delinquent).  |       |
| <b>Count Window</b>                                |  |       |
| <input type="checkbox"/>                           | Children and youth are residents of a live-in institution or facility for at least 1 day within the 30-day count window (one day of which must be in October).   |       |
| <input type="checkbox"/>                           | <i>Enter other requirements here, if needed.</i>   |       |
| <b>Child or Youth Eligibility</b>                  |  |       |
| <input type="checkbox"/>                           | Children and youth are 5 to 17 years of age during the count window.   |       |
| <input type="checkbox"/>                           | Children and youth are not also counted in the State agency Annual Count or other Title I funding stream count.  |       |
| <input type="checkbox"/>                           | Each unique case is counted. (If a child or youth is enrolled at the beginning of the count window, is released, and is reenrolled later in the count window, he or she should be counted twice.)  |       |
| <input type="checkbox"/>                           | <i>Enter other requirements here, if needed.</i>   |       |

## Additional Neglected or Delinquent Resources

- <https://neglected-delinquent.ed.gov/>
- <https://www2.ed.gov/programs/titleipartd/legislation.html>

# Title II, Part A – Supporting Effective Instruction

## Overview of Title II, Part A

Title II, Part A Improving Educator Quality State Grants originally authorized as Eisenhower Professional Development and the Class Size Reduction programs under the Elementary and Secondary Education Act (ESEA) of 1965, was reauthorized in 2001 by the No Child Left Behind Act (NCLB) and in 2015 by the Every Student Succeeds Act (ESSA). While ESEA/ESSA was authorized in December of 2015, the Consolidated Appropriations Act of 2016 extended the date by which certain parts of the Act would be effective. Further guidance has been provided by ED in the form of Dear Colleague Letters and FAQs. In 2012, ED allowed SEAs to submit Flexibility Waivers. Per these FAQs, all flexibility requests are null and void as of August 1, 2016.

Improving Teacher Quality State Grant funds are obtained by a State on the basis of the United States Department of Education's (ED) approval of either (1) an individual State plan as provided in ESEA/NCLB Sec. 2112 (20 USC §2112) or (2) a consolidated application that includes the program, in accordance with ESEA/NCLB Sec. 9302 (20 USC §7842). Through the program, state and local educational agencies (SEAs and LEAs) receive funds using a ED provided formula based on poverty and population. This formula will be adjusted annually from July 2017 – July 2021.

## Purpose (SEC. 2001)

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, principals and other school leaders,
- Increase the number of teachers, principals and other school leaders who are effective in improving student academic achievement in schools, and
- Provide low-income and minority students greater access to effective teachers, principals and other school leaders.

## Planning

Needs Assessment

- Establish a timeline for conducting the LEA Needs Assessment and prioritizing needs
- Gather and analyze data and prioritize needs
- Summarize and analyze data to identify strengths and areas for growth
- Prioritize uses of Title II, Part A funds

| Stakeholders                                   | Student Data  | School Data                    | Educator Data  |
|--|---|--------------------------------|--|
| Educators<br>Students<br>Families<br>Community | Demographics<br>Achievement<br>and Growth<br>Graduation Rates | Resources<br>Safety<br>Climate | Effectiveness<br>Retention Rates<br>Areas of<br>Expertise and<br>Shortages<br>Job Satisfaction |

## **Consultation** (Sec. 2102(b)(3))

LEAs **shall** consult with:

- Teachers, principals, leaders
- Paraprofessionals, instructional support
- Charter leaders, parents, community partners
- Others with expertise

## **eGAP Title II, Part A Plan**

In Title II-A, Supporting Effective Instruction of eGAP, the following questions are located at the top of the budget details page. This is a required plan in order to receive Title II-A funds. Each question should be answered completely.

### **Consultation Process**

1. Provide a list of stakeholders involved in the consultation process. Include a list of team members and their positions. 2102(b)(3)(A)
2. Describe the consultation process used in determining the use of Title II-A funds. 2102(b)(3)(B)

### **Narratives**

1. Describe the activities to be carried out by the local educational agency under this section and how these activities will be aligned with challenging State academic standards. 2102(b)(2)(A)
2. Describe the local educational agency's systems of professional growth and improvement, such as induction for teachers, principals, or other school leaders and opportunities for building the capacity of teachers and opportunities to develop meaningful teacher leadership. 2102(b)(2)(B)
3. Describe how the local educational agency will prioritize funds to schools served by the agency that are implementing comprehensive support and improvement activities and targeted support and improvement activities under section 1111(d) and have the highest percentage of children counted under section 1124(c). 2102(b)(2)(C)
4. Describe how the local educational agency will use data and ongoing consultation to continually update and improve activities supported under this part. 2102(b)(2)(D)

## **LEA Authorized Use of Funds**

Has the LEA prioritized funds to schools served by the agency that are implementing:

- a) comprehensive support and improvement activities under Section 1111?
- b) targeted support and improvement activities under Section 1111?
- c) and schools that have the highest percentages of students in poverty under Section 1111(d)?



## **TYPES OF ACTIVITIES:** (Sec. 2103(b))

### **Evaluation and Support Systems** (Sec. 2103(b)(3)(A))

LEAs may use Title II funds in developing or improving a rigorous, transparent, and fair **evaluation and support system** for teachers, principals, or other school leaders

- 1) based in part on evidence of student achievement, which may include student growth
- 2) include multiple measures of performance
- 3) provide clear, timely, and useful feedback

### **Recruiting, Hiring, and Retaining Effective Teachers** (Sec. 2103(b)(3)(B))

LEAs may use Title II funds to develop and implement initiatives to recruit, hire, and retain effective teachers, particularly in low-income schools with high percentages of ineffective teachers and high percentages of students who do not meet state standards.

Initiatives may provide:

- Expert help in screening candidates and enabling early hiring
- Differential and incentive pay for teachers, principals, or other school leaders in high-need academic subject areas and specialty areas, which may include performance-based pay systems
- Teacher, paraprofessional, principal, or other school leader advancement and professional growth, and an emphasis on leadership opportunities, multiple career paths, and pay differentiation
- New teacher, principal, or other school leader induction and mentoring programs
- The development and provision of training for school leaders, coaches, mentors, and evaluators on how accurately to differentiate performance, provide useful feedback, and use evaluation results to inform decision making about professional development, improvement strategies, and personnel decisions
- A system for auditing the quality of evaluation and support systems

### **Recruiting from Other Fields** (Sec. 2103(b)(3)(C))

LEAs may use Title II funds to recruit qualified individuals from other fields to become teachers, principals, or other school leaders. Qualified individuals from other fields include mid-career professionals from other occupations, former military personnel, and recent graduates of institutions of higher education with records of academic distinction who demonstrate the potential to become effective teachers, principals or other school leaders.

### **Class Size Reduction** (Sec. 2103(b)(3)(D))

LEAs may use Title II funds to reduce class size to a level that is **evidenced-based**, to the extent the SEA (in consultation with LEAs) determines such evidence is reasonably available. LEAs may consider reducing class size as one strategy to attract and retain effective educators in high-need schools.

- Class size reduction teachers should be supplemental and not the only teacher in that grade or subject
- Document the need and research-based evidence to show that the teachers are hired to reduce the class size to address the identified need
- Teachers cannot be hired with Title II, Part A funds so that the district can use the funds for another purpose

**Personalized Professional Development** (Sec. 2103(b)(3)(E))

Title II funds can be used to provide high-quality, personalized professional development for **teachers, instructional leadership teams, principals, and other school leaders**. The professional development must be evidence-based and focus on improving teaching and student learning and achievement, including supporting efforts to train teachers, principals, or other school leaders to:

- Effectively integrate technology into curricula and instruction
- Use data to improve student achievement and understand how to ensure individual student privacy is protected
- Effectively engage parents, families, and community partners, and coordinate services between school and community
- Help all students develop the skills essential for learning readiness and academic success
- Develop policy with school, LEA, community, or state leaders
- Participate in opportunities for experiential learning through observation

**Increasing Teacher Effectiveness for Students with Disabilities and English Learners**

(Sec. 2103(b)(3)(F))

Title II funds can be used to develop programs and activities that increase teachers' ability to effectively teach children with disabilities and English learners, which may include the use of multi-tiered system of support such as the Positive Behavioral Intervention and Supports (PBIS).

**Supporting Early Education** (Sec. 2103(b)(3)(G))

Title II funds can be used to provide programs and activities to increase the knowledge base of teachers, principals, or other school leaders on instruction in the early grades and on strategies to measure whether young children are progressing.

**Supporting Effective Use of Assessments** (Sec. 2103(b)(3)(H))

Title II funds can be used to provide training, technical assistance, and capacity-building to assist teachers, principals, or other school leaders with selecting and implementing formative assessments, designing classroom-based assessments, and using data from such assessments to improve instruction and student academic achievement, which may include providing additional time for teachers to review student data and respond, as appropriate.

**Supporting Awareness and Treatment of Trauma and Mental Illness, and School Conditions for Student Learning** (Sec. 2103(b)(3)(I))

Title II funds can be used:

- To carry out in-service training for school personnel in the techniques and supports needed to help educators understand when and how to refer students affected by trauma, and children with, or at risk of, mental illness
- As a referral mechanisms that effectively link such children to appropriate treatment and intervention services in the school and in the community
- To form partnerships between school-based mental health programs and public or private mental health organizations
- To address issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism

**Supporting Gifted and Talented Students** (Sec. 2103(b)(3)(J))

Title II funds can be used to provide training to support the identification of students who are gifted and talented, including high-ability students who have not been formally identified for gifted education services, and implementing instructional practices that support the education of such students, such as early entrance to kindergarten, enrichment, acceleration, and curriculum compacting activities, and dual or concurrent enrollment programs in secondary school and postsecondary education.

**School Library Programs** (Sec. 2103(b)(3)(K))

Title II funds can be used to support the instructional services provided by effective school library programs.

**Preventing and Recognizing Child Sexual Abuse** (Sec. 2103(b)(3)(L))

Title II funds can be used to provide training for all school personnel, including teachers, principals, other school leaders, specialized instructional support personnel, and paraprofessionals, regarding how to prevent and recognize child sexual abuse.

**Supporting Science, Technology, Engineering, and Mathematics (STEM)** (Sec. 2103(b)(3)(M))

Title II funds can be used to develop and provide professional development and other comprehensive systems of support for teachers, principals, or other school leaders to promote high-quality instruction and instructional leadership in science, technology, engineering, and mathematics subjects, including computer science.

**Feedback Mechanisms to Improve School Working Conditions** (Sec. 2103(b)(3)(N))

Title II funds can be used to develop feedback mechanisms to improve school working conditions. This can include periodically and publicly reporting feedback on educator support and working conditions.

**Supporting Postsecondary and Workforce Readiness** (Sec. 2103(b)(3)(O))

Title II funds can be utilized to provide high quality professional development for teachers, principals, or other school leaders on effective strategies to integrate rigorous academic content, career and technical education, and work-based learning which may include providing common planning time, to help prepare students for postsecondary education and the workforce.

## Evaluation

- What is the program evaluation plan?
- Are the activities identified in the needs assessment?
- Are the activities aligned with challenging state standards?
- What are reasonable expectations of success and how can success be measured?
- Did teacher effectiveness increase?
- Did academic achievement improve?
- How will data and ongoing consultation be used to update and improve activities?

## What is an “Evidence-Based” Intervention? (Sec. 8101(21)(A))

The term “evidence-based”, when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that –

- (i) demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on –
  - (I) strong evidence from at least one well-designed and well-implemented experimental study;
  - (II) moderate evidence from at least one well-designed and well-implemented quasi-experimental study; or
  - (III) promising evidence from at least one well-designed and well-implemented correlational study with statistical controls for selection bias; or
- (ii) (I) demonstrates a rationale based on high-quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and
  - (II) includes ongoing efforts to examine the effects of such activity, strategy, or intervention.

## Professional Development (Sec. 8101(42)(A)(B))

Professional Development means activities that are an integral part of school and local educational agency strategies for providing educators (including teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, and as applicable, early childhood educators) with the knowledge and skills necessary to enable students to succeed in a **well-rounded education** and to meet the challenging State academic standards.

### **Well-Rounded Education**

- English, reading or language arts, writing
- Science, technology, engineering, mathematics
- Computer science, career and technical education
- Foreign languages
- Civics, government, economics, history, geography
- Arts, music
- Health and physical education

### **Activities that are:**

- Sustained (not stand-alone, 1-day, or short term workshops), intensive, collaborative, job-embedded, data-driven, and classroom focused;
- Available to all school staff, including paraprofessionals;
- Inclusive of teachers of all subjects;
- Developed with educator input; and
- Regularly evaluated

## Teacher and Paraprofessional Qualifications (Sec. 1111(g)(2)(J)(M))

The State educational agency will ensure that all teachers and paraprofessionals working in a program supported with funds under this part meet applicable State certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification.

The State has professional standards for paraprofessionals working in a program supported with funds under this part, including qualifications that were in place on the day before the date of enactment of the Every Student Succeeds Act.

In order to be employed as an **Instructional** Paraprofessional, an individual must obtain a secondary school diploma or its recognized equivalent and **one** of the following qualifications:

- Successful completion of at least two years (48 semester hours or 60 quarter hours) of study at an institution of higher education, or
- An Associate's Degree documented on an official transcript from an accredited institution of higher education, or
- Met a rigorous standard of quality and can demonstrate, through a formal state or local academic assessment, knowledge of, and the ability to assist in, instructing reading, writing, and mathematics.

In 2004, the Alabama State Department of Education approved the *WorkKeys Assessment* to meet the requirement outlined in bullet 3 above. Currently, the requirements are a minimum of Level 3 scores on the following tests: Applied Math, Work Place Documents, and Business Writing.

# Title III, Part A – Language Instruction for English Learners & Immigrant Students

## Overview of Title III, Part A

The ALSDE is committed to providing all students an equal opportunity to benefit from educational programs and services. Further, the ALSDE is committed to supporting evidence-based and effective appropriate programs, practices, training, and accountability so that all students can become proficient in English and achieve the state’s academic content and standards. The ALSDE has the responsibility for implementing *Title III of the Elementary and Secondary Education Act* (ESEA) as amended by the Every Student Succeeds Act (ESSA) (September 2016). References that follow may be found in Section 3101 “English Language Acquisition, Language Enhancement and Academic Achievement Act” (20 U.S.C. 6811) of ESSA unless specifically noted.

The term “**English Learner or EL**”, when used with respect to an individual, means an individual:

- (A) who is enrolled or preparing to enroll in an elementary school or secondary school;
- (B) who was not born in the United States **or** whose native language is a language other than English;
  - (I) who is a Native American or Alaska Native, or a native resident of the outlying areas
  - (II) who comes from an environment where a language other than English has had a significant impact on the individual’s level of English language proficiency
  - (I) whose difficulty in speaking, reading, writing, or understanding the English language may be sufficient to deny the individual the ability to meet the State’s proficient level of achievement on State assessments
  - (II) the ability to successfully achieve in classrooms where the language of instruction is English; or
  - (III) the opportunity to participate fully in society.

The term “**Immigrant**” means an individual who:

- (A) Is age 3-21
- (B) Is not born in any State; and
- (C) Has not attended one or more schools in any one or more States for more than 3 full academic years

Note: An immigrant student need not be an EL. For example, a student who moved from Australia who is fluent in English meets the criteria to be identified as an immigrant student but may not be an “EL”.

The ALSDE is responsible for enforcing Title VI of the *Civil Rights Act of 1964*, which prohibits discrimination in programs and activities that receive federal financial assistance. Local education agencies (LEAs) that receive federal financial assistance cannot discriminate based on race, color, or national origin. These Title VI regulatory requirements prohibit denial of equal access to education because of a student's proficiency in English possibly making them unable to participate in or benefit from general or special education instructional programs.

Title III is subject to strict "supplement not supplant" (SNS) requirements that affect how Title III funds may be spent. (See Section 3115(g)). Basically, SNS requires Title III funds to be "added to" (supplemental) and not "replace" (supplant) other federal, state, and local funds. The presumption of supplanting may be rebutted or disputed with evidence if the LEA can show it would not have provided the services in question with non-federal funds had the federal funds not been available. As another example, the LEA cannot use Title III funds to meet the requirements of federal, state, or local law. LEAs have legal obligations to ensure that ELs can meaningfully and equally participate in education programs and services specifically under Title VI of the *Civil Rights Act of 1964* and the *Equal Educational Opportunities ACT (EEOA)*.

Consequently, LEAs may not:

- Provide services, financial aid, or other benefits **that are different** or in a different manner from what all students receive.
- **Restrict** an individual's enjoyment of an advantage or privilege enjoyed by others.
- **Deny an individual the right** to participate in federally assisted programs.
- **Hamper or substantially impede** the objectives of federally assisted programs

## Home Language Survey

English Learners (ELs) must be identified at the point of enrollment. A consistent enrollment procedure for language-minority students, which includes the use of a Home Language Survey (HLS), facilitates their entry into the new school environment. A language-minority student is one whose home language is a language other than English. It is vital to have trained school personnel who are dedicated to meeting the needs of students from different cultures with different levels of English proficiency.

A Home Language Survey (HLS) must be completed for each student registering for enrollment in an Alabama public school. It is beneficial to conduct an interview with the student and/or parents during the enrollment process. Information such as limited or interrupted formal education, emotional trauma, cultural awareness, and other special circumstances will support the EL committee decisions when considering the individualized educational plan for the student. The assistance of a translator may be required to complete the interview and survey. The completed survey becomes part of the student's permanent record and should be available for future reference.

The Home Language Survey contains, at a minimum, a version of the following questions:

- Is a language other than English spoken at home?
- Is your child's first language a language other than English?
- What language did your child learn when he/she first began to talk?
- What language does your child most frequently speak at home?
- In what country was your child born?
- Has your child been in US schools for at least three years?

When all responses on the HLS indicate that English is the only language used by the student and by individuals in the home, the student is considered an English-only speaker. Procedures established by the school system for placement in the general student population should be followed. If any response on the HLS indicates the use of a language other than English by the student or an individual in the home, then further assessment must be conducted to determine the student's English-language proficiency level. However, the presence of a language other than English does not automatically signify that the student is not a competent and proficient speaker of English.

## Foreign Exchange Students

A foreign exchange student who is enrolled in a public elementary or secondary school in the United States, and who is an EL is a "person in the United States," and based on language of Title VI and the Lau holding the Lau provisions would apply. The student would be included in the accountability system similar to any other student enrolled in the school and would take the content assessments as well.

*(Lau v. Nichols (US Supreme Court Decision 1974)) "The failure of the school system to provide English language instruction to approximately national origin students who do not speak English, or to provide them with other adequate instructional procedures, denies them a meaningful opportunity to participate in the public educational program, and thus violates §601 of the Civil Rights Act of 1964, which band discrimination based "on the ground of race, color, or national origin," in "any program or activity receiving Federal financial assistance," and the implementing regulations of the Department of Health, Education, and Welfare. Pp. 414 U. S. 565-569."*

*The Supreme Court stated that these students should be treated with equality among the schools. Among other things, Lau reflects the now-widely accepted view that a person's language is so closely intertwined with their national origin (the country someone or their ancestors came from) that language-based discrimination is effectively a proxy for national-origin discrimination.)*



### Title III, Part A Funds Allowable Uses of Funds

- Providing effective language instruction educational programs (LIEPs) that meet the needs of ELs and demonstrate success in increasing English language proficiency and student academic achievement.
- Providing effective professional development to classroom teachers (including teachers in classroom settings that are not the settings of LIEPs), principals and other school leaders, administrators, and other school or community-based organizational personnel, that is:
  1. Designed to improve the instruction and assessment of ELs,
  2. Designed to enhance the ability to understand and implement curricula, assessment practices and measures, and instructional strategies for ELs,
  3. Effective in increasing children's English language proficiency or substantially increasing the subject matter knowledge, teaching knowledge, and teaching skills of such teachers, and
  4. Of sufficient intensity and duration (which shall not include activities such as 1-day or short-term workshops and conferences) to have a positive and lasting impact on the teachers' performance in the classroom.
  5. Providing and implementing other effective activities and strategies that enhance or supplement language instruction educational programs for ELs, which must include parent, family, and community engagement activities, and may include strategies that serve to coordinate and align related programs.
  6. Upgrading program objectives and effective instructional strategies,
  7. Improving the instructional program for ELs by identifying, acquiring, and upgrading curricula, instructional materials, educational software, and assessment procedures,
  8. Providing to ELs tutorials and academic or career and technical education, and intensified instruction, which may include materials in a language that the student can understand, interpreters, and translators,
  9. Developing and implementing effective preschool, elementary school, or secondary school language instruction educational programs that are coordinated with other relevant programs and services,
  10. Improving the English language proficiency and academic achievement of ELs,
  11. Providing community participation programs, family literacy services, and parent and family outreach and training activities to ELs and their families to improve the English language skills of ELs, and to assist parents and families in helping their children to improve their academic achievement and becoming active participants in the education of their children,
  12. Improving the instruction of ELs, which may include ELs with a disability, by providing for: the acquisition or development of educational technology or instructional materials; access to, and participation in, electronic networks for materials, training, and communication; and incorporation of these resources into curricula and programs,
  13. Offering dual or concurrent enrollment programs or courses designed to help ELs achieve success in postsecondary education, and

#### 14. Carrying out other activities that are consistent with the purposes of Title III subgrants

In order to meet civil rights obligations for EL students, LEAs must follow Guidance from the U.S. Department of Education, which include the following:

- Identify and assess all potential EL students in a timely and reliable manner.
- Provide EL students with language assistance programs that are sound and proven effective.
- Provide sufficiently well-prepared and trained staff that can support and sustain the language program.
- Ensure that EL students may meaningfully participate in curricular and extracurricular activities.
- Avoid unnecessary segregation of EL students.
- School districts may use up to 2% of its funds for administrative costs.
- Ensure that EL students who have or are suspected of having a disability under the *Individuals with Disabilities Education Act (IDEA)* or Section 504 of the *Rehabilitation Act of 1973* are identified, located, and evaluated in a timely manner.
- Meet the continuing needs of students whose parent(s) have opted them out of language assistance programs.
- Monitor and evaluate students in language assistance programs to ensure their progress.
- Evaluate the effectiveness of school programs to ensure students are receiving effective instruction.
- Ensure that EL parents receive regular communications in a language they can easily understand.

#### **Title III Funds are Required to be used for:**

- Supplementing existing effective language instruction educational programs (LIEPs) to meet the needs of ELs and that demonstrate evidence of success in increasing English language proficiency and student academic achievement (Section 3115(c)(1)).
- Providing effective professional learning for classroom teachers, (both regular and specialized), principals and other school leaders, and administrators, that will enhance and grow their ability to understand and implement curricula, assessment and instructional strategies for ELs (Section 3115(c)(2)).
- Providing and implementing other effective activities and strategies related to parent, family and community engagement activities (Section 3115(c)(3)).

#### **Title III Funds *may* be used for (Section 3115(d)):**

- Upgrading instructional strategies
- Upgrading curricular materials
- Providing tutoring, intense instruction, interpreters, and translators for instruction
- Coordinating with other programs to improve preschool, elementary, secondary language instruction programs

- Providing community participation programs, family literacy services, parent and family outreach
- Supplementing the purchase of technology or instructional materials or access to electronic networks for materials, training and communication
- Offering early college or dual enrollment, and
- Carrying out other activities that are consistent with the purposes of this grant.

### **Title III Funds to Support Immigrant Children and Youth**

Title III funds are set aside at the state level to pay for activities that provide enhanced instructional opportunities for immigrant children and youth and are allocated to LEAs that have experienced substantial increases in the number of immigrant children.

Under ESSA, the term “immigrant children and youth”, means individuals who— (A) are aged 3-21; (B) were not born in any state, including Puerto Rico and Washington D.C.; and (C) have not been attending one or more schools in any one or more States for more than 3 full academic years.

Allowable activities may include:

- Family literacy, parent and family outreach and training activities designed to assist parents and families to become active participants in the education of their children.
- Recruitment and support for personnel, including teachers and paraprofessionals who have been specifically trained, or are being trained, to provide services to immigrant children and youth.
- Provision of tutorials, mentoring, and academic or career counseling.
- Identification, development, and acquisition of curricular materials, educational software, and technologies to be used in the program carried out with awarded funds.
- Basic instructional services that are directly attributable to the presence of immigrant children and youth including classroom supplies, costs of transportation, or other costs.
- Other instructional services that are designed to assist immigrant children and youth to achieve in elementary and secondary schools in the United States, such as programs of introduction to the education system and civics education.
- Activities coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants to assist parents and families by offering comprehensive community services.

### **Title III Funds Stakeholder Consultation**

State departments establish standardized statewide entrance and exit procedures including a requirement that all students who may be English learners are assessed for the status within certain timeframes. Entrance and exit procedures are determined through timely and meaningful consultation with local educational agencies representing the geographic diversity of the state.

### Title III Funds LEA Administrative Costs

LEAs may reserve up to 2% of their funds for administrative costs which are used only for *direct* administrative costs (Section 3115(b)). This also means that indirect costs are not part of the cap (See also *ED September 2016 Title III, Part A Guidance*, Question A-10)

### Title III Funds Maintenance of Effort

LEAs that receive Title III funds must comply with a maintenance of effort requirement (Section 8521) which ensures that they maintain a consistent level of state and local funding for free public education from year to year (*ED September 2016 Title III, Part A Guidance*, Question A-17).

### Title III Funds Equitable Services

Section 8501(b)(1)(C) states that Title III funds are subject to the equitable services requirement. This means that the LEA should ensure that eligible private school students, teachers, and other personnel have access to services provided by Title III if the LEA has a sufficient number of ELs that qualify it for the grant.

# Title IV, Part B – 21<sup>st</sup> Century Community Learning Centers

## Federal Guidelines

The 21st Century Community Learning Centers (CCLC) program is authorized under Title IV, Part B, of the *Every Student Succeeds Act (ESSA)*, to provide opportunities for communities to establish or expand activities in community learning centers. The purpose of the 21st CCLC program, as described in Section 4201(a), is to establish or expand Community Learning Centers that accomplish the following:

- Provide opportunities for academic enrichment, including the provision of tutorial services to help students (*particularly students in high poverty areas and those who attend low-performing schools*) to meet challenging State and local academic standards
- Offer students a broad array of additional services, programs, and activities that are designed to reinforce and complement the regular school day academic program of participating students.
- Offer families of students served by community learning centers opportunities for personal development in areas such as literacy and educational enhancement. The community learning centers should develop and nurture the potential for parents and families to assist in instructing their children while supporting their children's academic success and social development.

## **US Department of Education 21<sup>st</sup> CCLC Website**

The official ED 21<sup>st</sup> CCLC website is <http://www.ed.gov/programs/21stcclc/index.html>.

## **Elementary and Secondary Education Act – Reauthorized as ESSA**

In the fall of 2016, the Elementary and Secondary Education Act of 1965 (also formerly known as *No Child Left Behind*) was reauthorized as the **Every Student Succeeds Act – ESSA**.

Access the legislation in its entirety here – <https://www.gpo.gov/fdsys/pkg/BILLS-114s1177enr/pdf/BILLS-114s1177enr.pdf>

## **Elementary and Secondary Education Act – Reauthorized as ESSA**

The Non-Regulatory Guidance documentation is intended to provide information to help state education agencies and eligible schools understand how to participate successfully in the federal 21<sup>st</sup> CCLC program. Using a question-and-answer approach, information is presented on the purpose of the program, allocation of funds to the states, the competitive award process within states, and evaluation and accountability, among other topics.

<https://www2.ed.gov/programs/21stcclc/guidance2003.pdf>

**Please be advised:** *As of October 2017, the Non-Regulatory Guidance is in the process of being updated by the ED to reflect all changes enacted through the implementation of ESSA.*

## Federal Legislation, Regulations, and Guidance

### **Purpose and Program Description**

In support of the educational initiatives of the ED and the Alabama State Department of Education (ALSDE), the 21st Century Community Learning Centers (21st CCLC) Competitive Grant funding is an opportunity for schools, community-based and faith-based organizations, universities, for-profit agencies, and other eligible entities to establish and expand community learning centers that provide students, particularly those who attend high-poverty and low-performing schools, with academic enrichment opportunities during non-school hours.

Successful programs must demonstrate collaboration and cooperation with regular school academic programs and assist students in meeting state and local college- and career-ready curriculum standards through the provision of enrichment opportunities. Programmatic efforts must afford students and families a broad array of activities that complement learning, positively impact youth development, and promote parent and family engagement.

### **Eligibility**

Any public or private organization is eligible to apply for a 21st CCLC grant. Examples of such agencies and organizations may be, but are not limited to, the following:

- Local Education Agencies (LEAs)
- Community-Based Organizations (CBOs)
- Faith-Based Organizations (FBOs)
- Institutions of higher education
- Non-profit agencies
- City or county governments
- For-profit corporations

Pursuant to ESSA, Title IV, Part B, Section 4204(b)(2)(H), with each proposal there is an expected standard of collaboration and coordination between any organization (CBO, FBO, Non-Profit Agency, public or private entity, etc.) and the local LEA. In like fashion, any LEA applying must partner, collaborate, and coordinate with at least one external organization within the community and/or State. An exception to this rule is only permissible by statute if the LEA can demonstrate it is unable to partner with a community-based organization within reasonable geographic proximity and of sufficient quality to meet the requirements of this component.

The proposed service site for a Community Learning Center (CLC) must be located within the geographical attendance zone of the eligible school(s) from which students will be served. By federal guidelines and statutes, the ALSDE must ensure that funding priorities and diversity among grantees are balanced with regard to geographical areas, urban and rural service sites, and as outlined within the applicable legislation.

## **Type of Projects**

Each eligible entity that receives an award from the state may use the funds to carry out a broad array of before- and after-school activities (including those held during summer recess periods, weekends and holidays) to advance student achievement. These activities may include some of the following:

- Remedial education activities and academic enrichment learning programs, including those which provide additional assistance to students to allow the students to improve their academic achievement in Mathematics and science education activities
- Arts and music education activities
- Entrepreneurial education programs
- Tutoring services, including those provided by senior citizen volunteers, and mentoring programs
- Programs that provide after-school activities for limited English proficient (LEP) students and that emphasize language skills and academic achievement
- Recreational activities
- Telecommunications and technology education programs
- Expanded library service hours
- Programs that promote parental involvement and family literacy
- Drug and violence prevention programs
- Counseling programs
- Character education programs

**Please be advised:** Though very detailed with an abundance of information, not every situation a grantee will encounter can be addressed in the law and regulations. Therefore, it is essential when in doubt – the grantee must seek the assistance of its assigned Technical Advisor.

## **Laying the Foundation**

Preparing for a 21<sup>st</sup> Century Community Learning Center is a multi-faceted process which requires much in-depth planning, research, and due diligence. 21<sup>st</sup> CCLC programs are developed and implemented as partnerships between schools and community organizations to change *for good* the lives of students and their families.

The proceeding pages and information are a mere skeletal guideline provided to hopefully increase the probability of a program's success. All grantees or those interested in becoming a 21<sup>st</sup> CCLC grantee must – in all aspects – defer to the thorough guidance and insight provided by the Alabama State Department of Education.

## ***Do the homework!***

- Know the regulations and stipulations required by Federal and State laws
  - Understand the legal documentation contained within this manual and the afore-referenced websites
  - Meet all eligibility standards as required by law.

- Thoroughly review and know the requirements outlined in the ALSDE **RFA** (Request for Application)
- Organize multiple planning meetings to prepare the application
- Establish the program's leadership or *management team* and an **Advisory Council**
- Survey students, parents, and other stakeholders. Conduct sound, extensive research to address the specific needs of the community served through the program. – **Evidence-based Research**
- Involve key players from the school, community organizations and surrounding community in the planning process. – **Community Partners**
- Allow plenty of time to prepare the proposal carefully and thoughtfully. Do not rush through the process.

## Advisory Council

An Advisory Council is a collection of individuals who bring unique knowledge and skills which complement the knowledge and skills of the program's leadership in order to more effectively guide the CLC.

***The 21<sup>st</sup> CCLC Grant specifies that each Grantee must have an Advisory Council which meets on a regular basis. Since scheduling can be quite a challenge, the ALSDE recommends the council meet at least twice a year.***

Advisory Council members can answer questions, analyze business plans, recommend new markets, and introduce the program to useful individuals to further its objectives.

The Advisory Council does not have formal authority to govern the 21<sup>st</sup> CCLC program. That is, the Advisory Council cannot issue directives that must be followed. Rather, it serves to make recommendations and/or provide key information and materials.

Select Advisory Council members wisely. It is highly recommended that the council be truly reflective of the community the program serves while embracing great diversity with a broad array of views and expertise.

*Things to remember and consider –*

### **Advisory Board Attributes:**

- Objective and honest
- Knowledge and expertise in various scholastic and business realms that differ from program leadership
- A genuine interest in helping the program succeed
- Problem solvers who are good communicators
- Diverse in skills, work and life backgrounds
- Top or well-respected individuals in their field
- Well-connected with networks that may be leveraged to assist the program



### Legalities/Ground Rules:

- Require a non-disclosure agreement (Although children nor their families should ever be discussed in meetings, it is imperative that any information communicated never be publicly divulged.)
- Set expectations for the time commitment expected & duration of appointment
- Provide a written invitation letter
- Let each member know the specific type of assistance needed
- Always provide a meeting agenda. This is a volunteer elite advisory team. Respect their time. Say thank you and express appreciation.

### Advisory Board Value:

- Identify the desired result from engaging an advisory board
- Ask yourself, how will the program be different in one year, because of this board?
- How often will membership be rotated? Is this ongoing and how often will the Council meet?

*Please note that the LEA School Board and/or the Community Entity governing board govern Advisory Council actions/recommendations. The applicable board must first approve actionable recommendations.*

### Pre-opening Timeline

The following timeline is provided as a *guide* to prepare for the opening of a 21<sup>st</sup> CCLC Program prior to the submission of the Competitive Grant Application to the ALSDE, and thereafter until the point of opening.

Since this is a *working* manual, that which is left blank should be completed by the grantee as the pertinent dates are made available and mandated by the ALSDE. *This list is not intended to be comprehensive, but should serve as an overall guideline.*

| At least 6 months before applying   |
|---|
| <ul style="list-style-type: none"><li>• Obtain LEA/Superintendent or Board approval</li><li>• Formulate Research and Development Committee</li><li>• Conduct market and demographic investigative study (SBR)</li><li>• Appoint Advisory Council</li><li>• Select Leadership of the Program</li><li>• Obtain all pertinent legal operating documentation (Submit with application) (<i>i.e., DHR licensure, IRS Employer ID #, inspections, certifications, etc.</i>)</li><li>• Develop complete comprehensive <i>Safety Plan</i> to be formally included in the application.</li></ul> |
| 3 to 6 months before applying   |
| <ul style="list-style-type: none"><li>• Consult with ALSDE Representative</li><li>• Schedule ALSDE visit to determine capacity to implement</li><li>• Attend ALSDE – sponsored Application Technical Assistance Workshop(s)</li></ul>   |

| Other Important Dates  |
|--|
| <ul style="list-style-type: none"> <li>• Application Due Date: _____</li> <li>• Grant Readings and Reviews (ALSDE): _____</li> <li>• Allocation Award Announcements: _____</li> </ul>  |
| At least 3 months prior to opening   |
| <ul style="list-style-type: none"> <li>• Advertising Campaign</li> <li>• Develop policies and procedures</li> <li>• Create Student/Parent/Staff Policy Handbook(s)</li> <li>• Prepare Comprehensive Registration Form (Packet)</li> <li>• Plan and organize Staff Preparation and Training</li> </ul>  |
| At least 1 month prior to opening  |
| <ul style="list-style-type: none"> <li>• Interview and Hire Staff</li> <li>• Conduct Staff Training – setting expectations and standards<br/>(A Staff Handbook is highly advisable.)</li> <li>• Meet with School Day Teachers and Staff</li> <li>• Begin ordering and purchasing needed materials and equipment</li> <li>• Establish snack program with the State Child Nutrition Program</li> <li>• Distribute Registration Forms, allowing 2-3 weeks for registration</li> </ul> |
| At least 3 weeks prior to opening  |
| <ul style="list-style-type: none"> <li>• Finalize Operational Procedures <ul style="list-style-type: none"> <li>○ Filing and Accounting System</li> <li>○ Sign-in/Sign-out Sheets</li> <li>○ Scheduling of Staff, Students, Contractors, etc.</li> <li>○ Safety Procedures solidified</li> </ul> </li> </ul>   |
| At least 1 week prior to opening   |
| <ul style="list-style-type: none"> <li>• Facilitate Parent/Family and Staff Orientations</li> </ul>  |

## Community Partners

The information available regarding the selection, establishment, and nurturing of community partners is overly abundant in today's world. Our society has begun to recognize the tremendous need for quality, affordable afterschool programs in response to the educational, developmental, and security needs of students. Additionally, our culture has seen the demand for increased parental/family support as societal pressures have perpetually escalated.

Therefore, the awareness and desire to support afterschool initiatives is available. It *must* be our goal to properly identify those within the community who are willing to establish *mutually beneficial relationships*.

***The 21<sup>st</sup> CCLC Grant requires that each grantee establish at least one viable relationship with a Community Partner with whom they have an ongoing association.***

By building working associations within the community served, the following can be accomplished:

- Achievement that individuals alone cannot undertake  
*The adage, "No man is an island," rings very true when establishing a sustainable program that will serve the families of the community for years to come.*
- A systematic, comprehensive approach to address community needs  
*The grantee, after having done their due diligence, must provide a program that is specifically geared toward meeting the needs that are indigenous to the area served.*
- Enhancement of advocacy and resource development  
*A genuinely effective program will foster a better understanding of educational objectives and needs. It will render volunteerism and engagement; and provide businesses and agencies with potential skilled employees from student ranks.*
- Creation of additional public recognition, visibility for the program and community needs  
*"The Proof is in the Pudding" – Initially, when garnering support, utilize nationally and locally publicized data that verifies student/family necessities and how an effective 21<sup>st</sup> CCLC will be beneficial to all. Once established, use the data and success stories from your own program that will generate ongoing collaboration and assistance.*

Remember a grantee should consider the **entire community** a partner. Endless possibilities abound!

***Finally, and most importantly...***

- Students are exposed to a broad array of activities that enhance academic achievement and directly connect them to the community and workforce  
*By nurturing the family as a holistic entity, the desire for lifelong learning and attainment are fostered to benefit all involved.*

**A basic structural guideline to consider while formulating viable partnerships is provided here:**

**Clarify the goals, mission and objectives of the program**

- *Write the vision and make it plain for all constituents to know and see*
- *Outline the goals, the needs, the expectations of the program*

**Develop an understanding** of relevant existing activities in the school and in the community (outside of your organization), as well as, a thorough understanding of your own resources and expertise

- *Help the potential partner understand how the program will benefit them and the community*

**Decide the type of partnership** you want to create and identify desired results

- *Engage partners in determining their interests, needs, goals, and expectations from the relationship*
- *Link the objectives to the specific services and resources available through the potential partner*

**Create a realistic implementation plan** that meets schools needs and leverages school and community resources

- *Draft a proposal establishing the benefits and expectations for both parties*
- *Be specific with timelines, activities, resources, etc.*

**Maintain constant communication** among partners, both informal and formal dialogue -- anticipating challenges, solving problems, resolving conflicts, and assessing progress

- *Mutually determine the contact individual(s)*
- *Remain open, honest and consistent*
- *Publicly recognize the partner's help and support*
- *Invite partners to 21<sup>st</sup> CCLC events*
- *Include partners in all communications – newsletters, assemblies, programs, etc.*

**Plan for long-term sustainability** and build capacity within the school community

- *Complete an annual review/evaluation of the partnership **with** partners*
- *Invite existing partners to recommend additional partnerships, if they are pleased with the ongoing results*
- *The number of partners is unlimited – they may provide services, funding, activities, etc. – the possibilities are limitless*

When seeking the appropriate partners and collaborators, begin with some of the following broad categories:

- Service provider agencies
- Community volunteer-based organizations
- Consumer/advocacy groups
- Professional associations
- Higher Education (Colleges, Universities)
- Businesses, Corporations, and Retailers
- Community leaders
- Cooperative Extension Services
- Financial Institutions
- Churches
- Police and Fire Departments, Public Works
- Hospitals
- Hotels and Restaurants
- Parks and Recreations
- Arts Alliance
- High School Clubs
- Fraternities and Sororities
- Boys and Girls Club
- Gyms and Wellness Centers
- Museums
- Senior Citizen Organizations

## Joint Co-Applicant

A Joint Co-Applicant is defined as an entity that provides a significant level of support during the pre-grant design, planning, and application phase, followed by significant involvement during the post-award program delivery of grant related services. Although the support may come in monetary form, in order to be considered a co-applicant, the organization must play an ongoing continuous role throughout the grant period, without which the applicant would not be able to have pursued a joint collaborative award of a 21st CCLC grant. Please be mindful of the following as you implement your program:

- Remember, your proposal was submitted through combined efforts!
- This collaboration is not merely a partnership through contracted provided services and can include material in-kind contributions to the program.
- Both partners must work extensively in the planning and design of the program.
- Both partners must demonstrate substantial roles in the delivery of services.
- Both partners must share grant resources to implement the proposed project effectively.
- Both partners must be involved in the management and oversight of the proposed program.
- Both partners must maintain a signed agreement (Form 5) between both entities stating the collaboration of efforts, resources, and funding. This document must clearly define and detail the roles and responsibilities of all parties involved with explicit expectations outlined.

If you submitted a joint proposal as a Joint Co-Applicant you must remember that the collaboration outlined in the application included detailed information regarding partnership management, programmatic collaboration, and fiscal collaboration and cooperation. (i.e., Narrative, Project Design, Services, Management, Assessment, etc.) You must implement every area with fidelity! Maintaining the funding throughout the entirety of the grant award period is contingent upon you maintaining the viability of the collaborative partnership.

**Note:** The ALSDE reserves the right to reduce or withdraw funding if the program fails to adhere to grant fidelity.

## Quality Indicators

**From the beginning to the completion of the project, Quality Indicators should be utilized to perform** regular Self-assessments of the ongoing operations and procedures of the program. The standards should be employed to ensure the effective and efficient implementation of all programmatic policies and procedures. During fiscal year FY 2017 – 2018, state specific Quality Standards developed in collaboration with the ALSDE, ALACN, ALDHR, USHHS, and a taskforce of representatives were released.

The first listing of standards and indicators pertains to the successful management and oversight of the program. The latter refers to the daily operations and practices that enable the grantee to offer a superior product to its students, families and community.

***NOTE: Although all verbiage pertains to Afterschool programs, the same principles and practices should be applied to both before-school and summer programs.***

## Program Management (Administrative/Leadership)

**Standard:** *The school's/community entity's policies and procedures support high quality afterschool programming for all children.*

- The school/community entity supports the afterschool program budget through direct and in-kind contributions, including staff, space, utilities, maintenance, administration, materials, and equipment.
- There is an afterschool site coordinator/program director responsible for facilitating regular and ongoing coordination and communication between and among school and afterschool staffs, families, and participants.
- Afterschool staff members model respect, cooperation, and honesty, reflect cultural diversity, and are philosophically aligned with the program goals and desired results.
- The principal and/or afterschool site coordinator/project director implement a plan for improving staff recruitment and retention, and for providing adequate financial compensation and benefits.
- The school/community entity identifies sources whose contributions to sliding fee scales, subsidies, and scholarships will make the afterschool program affordable for all families.
- The school/community entity accommodates children with special needs by utilizing school and community resources.
- Afterschool staff understands and embraces cultural differences and regularly plan activities that reflect various cultural traditions.
- Appropriate staff-to-child ratios are maintained by hiring adequate numbers of qualified staff and volunteers. Recommended ratio is between 1:10 and 1:15, with group size not to exceed 30, for ages 6 and older.
- There is an afterschool program handbook that includes current program policies and procedures.
- A comprehensive orientation on program philosophy, routines, and practices is provided for new staff members.
- Multiple systems are in place to maintain ongoing communication and routine sharing of information between afterschool staff and families about their children's well-being.
- Family members are encouraged to visit and/or volunteer in the program and have opportunities for input on policy and procedures.
- Afterschool staff participates in a process of continuous program evaluation and improvement.
- When the School/Community Entity contracts with a vendor to provide services, a written agreement is in place to ensure sound communication and to clarify policies, roles, and responsibilities with regard to space, supplies, storage, procedures for opening and closing, lines of communication, cleanup and maintenance, finances, licensing, and accountability.

**Standard:** *Procedures are in place to ensure the safety and security of children.*

- There is a system for signing children in and out of the afterschool program, for locating children at all times, and for knowing who will pick up each child at the end of the day.
- Staff is trained in first-aid procedures and practices, and current health, safety, and nutrition standards appropriate for school-age children. There is current documentation that the after-school program meets state and-or local health and safety guidelines and regulations.
- The School/Community Entity building and grounds are clean, aesthetically pleasing, safe, and well maintained. A sign with the 21<sup>st</sup> CCLC logo and name will be prominently displayed on the school campus or other program site, and included on all forms of communication (i.e., letterhead, brochures, website, etc.)

**Standard:** *The program is supported with adequate and financial and material resources.*

- Budget allocations reflect support of a variety of program options.
- School/Community Entity, volunteers, and community advisors actively seek supplemental financial or material support from parents, business, civic organizations, and government and social service agencies to support programming options.
- Afterschool program has access to school equipment, supplies, and resources, including computer and science labs, libraries, classroom facilities, gyms, and playgrounds.

**Standard:** *The afterschool program is supported by provision of professional development opportunities for staff.*

- Current schedule of workshops, seminars, and other development opportunities offered by local schools, universities, churches, and civic organizations are displayed prominently and staff is encouraged to attend.
- Time and financial resources are provided for attendance at workshops, seminars, and conferences; for subscriptions to professional journals; and for professional interaction with other Afterschool staff.
- Afterschool staff is included in appropriate development opportunities offered by the school.
- Afterschool staff receives at least 10 hours of in-service training a year in some of the following:
  - Child and adolescent development
  - Recognizing the range of children's abilities
  - Developing multiple activities for a wide range of age and skill levels
  - Understanding cultural diversity
  - Guiding behavior
  - Program management and evaluation
  - Leadership traits and behavior
  - Communication skills
  - Group processes
  - Effectively working with families
  - Identifying and working with special needs children



- Afterschool site coordinator/project director meets regularly with staff to provide continuous feedback and supervision, and to determine in-service needs.

**Standard:** *The LEA/Community Entity supports safe transportation to and from afterschool programs.*

- School/Community Entity makes every effort to provide safe and free or low-cost transportation to and from the afterschool program.
- High standards are maintained for vehicle and driver safety and in selection of sites for drop-off and pick-up.
- Systems and procedures are in place for advance notification of changes in pick-up and drop-off routines for children.

**Standard:** *LEA/Community Entity and afterschool staff demonstrate respect for the importance of both school and afterschool experiences in children's development.*

- School/Community Entity and afterschool staff create a welcoming environment for children and their families by accommodating reasonable requests and taking concerns or suggestions through proper channels.
- A clear set of expectations for children's behavior is developed consistent with the needs, goals, and philosophy of both the school and the afterschool program
- School/Community Entity and afterschool staffs show professional respect for one another.
- Liaisons from the school and afterschool staffs maintain a flow of information by holding regular meetings to identify complimentary goals, determine desired results and goals for individual children, work toward a broad curriculum approach, and share and reflect on successes and challenges.
- School principal(s) and the site coordinator/program director work together to prevent or resolve problems.
- School/Community Entity and afterschool staffs promote consistent regular school day and afterschool practices that reflect and celebrate diversity.

### **Program Operations (Teachers and Daily Operational Staff)**

**Standard:** *Afterschool programming reflects a commitment to promote knowledge, skills, and understanding through enriching learning opportunities that complement the school day.*

- Schools/Community Entities use their resources and influence to ensure the program focuses on the development of the whole child, integrating supports for emotional, physical, social, and cognitive development.
- Opportunities for socializing and practice of social skills are provided.
- Opportunities for enrichment include some of the following:
  - Communication skills in reading, writing, speaking, spelling, and listening
  - Math skills in computation, application, and problem solving
  - Scientific inquiry into the natural and physical world, as well as practical applications of science and technology
  - Interrelationships of people and cultures to historic, geographic, and economic environments



- Participants in the arts, including visual arts, music, dance, and drama.
- Development of physical fitness and motor skills through sports and other physical activity.
- Opportunities for problem-solving that strengthen decision-making and higher-level thinking skills.
- Study and time-management skills to encourage children's responsibility for their own learning.
- Personal and civic responsibility and the significance of service to others.
- Appreciation of, and respect for, differences in culture, race, and gender.
- Skill development in computer and multimedia technology.

**Standard:** *The afterschool program actively seeks and promotes the involvement and support of the entire community in program planning and implementation.*

- School/Community Entity staff provides the essential link between school and after-school experiences by sharing information on curriculum, homework assignments, assessment results, and instructional strategies.
- Parents and other family members are welcome to support children's learning by participating or volunteering in afterschool activities, and they receive advice on promoting learning opportunities at home.
- Community members are invited to share their special talents and expertise with children in the afterschool program.
- Public facilities, such as libraries, parks, and community centers are utilized for expansion of program offerings.
- Churches, civic clubs, social service agencies, etc. are approached to provide volunteers, funding, and community service opportunities for children.
- Staff applies for available government funding.
- Area businesses are encouraged to provide release time for employees who volunteer their special expertise, and to donate surplus supplies and equipment.
- Staff establishes relationships with local colleges and universities that provide student volunteers, as well as a wealth of faculty expertise.
- Program maintains a library of current resources for staff use, including books, videotapes, and training manuals.

**Standard:** *The LEA's/Community Entity's policies and procedures support high-quality afterschool programming for all children.*

- The LEA/Community Entity supports the afterschool program budget through direct and in-kind contributions, including staff, space, utilities, maintenance, administration, materials, and equipment.
- There is an afterschool site coordinator/program director responsible for facilitating regular and ongoing coordination and communication between and among school and afterschool staffs, families, and participants.
- Afterschool staff model respect, cooperation, and honesty, reflect cultural diversity, and are philosophically aligned with the program goals and desired results.

- The principal and/or afterschool site coordinator/project director implement a plan for improving staff recruitment and retention and for providing adequate financial compensation and benefits.
- The School/Community Entity identifies sources whose contributors to sliding fee scales, subsidies, and scholarships will make the afterschool program affordable for all families.
- The school accommodates children with special needs by utilizing school and community resources.
- Afterschool staff understands and embraces cultural differences and regularly plan activities that reflect various cultural traditions.
- Appropriate staff-to-child ratios are maintained by hiring adequate numbers of qualified staff and volunteers. Recommended ratio is between 1:10 and 1:15, with group size not to exceed 30, for ages 6 and older.
- There is an afterschool program handbook that includes current program policies and procedures.
- A comprehensive orientation on program philosophy, routines, and practices is provided for new staff members.
- Multiple systems are in place to maintain ongoing communication and routine sharing of information between afterschool staff and families about their children's well-being.
- Family members are encouraged to visit and/or volunteer in the program and have opportunities for input on policy and procedures.
- Afterschool staff participates in a process of continuous program evaluation and improvement.
- When the School/Community Entity contracts with a vendor to provide services, a written agreement is in place to ensure sound communication and to clarify policies, roles, and responsibilities with regard to space, supplies, storage, procedures for opening and closing, lines of communication, cleanup and maintenance, finances, licensing, and accountability.

**Standard:** *Procedures are in place to ensure the safety and security of children.*

- There is a system for signing children in and out of the after-school program, for locating children at all times, and for knowing who will pick up each child at the end of the day.
- Inspection of equipment by certified safety professional is done on a monthly basis.
- Staff is trained in first-aid procedures and practices, and current health, safety, and nutrition standards appropriate for school-age children.
- There is current documentation that the afterschool program meets federal, state and local health and safety guidelines and regulations.
- The School/Community Entity building and grounds are clean, aesthetically pleasing, safe, and well maintained.
- A sign with the 21<sup>st</sup> CCLC logo and name will be prominently displayed on the school campus or other program site, and included on all forms of communication (i.e., letterhead, brochures, website, etc.)

**Standard:** *The program is supported with adequate financial and material resources.*

- Budget allocations reflect support of a variety of program options.
- The *LEA/Community Entity* consistently maintains all accounting reports and makes them readily accessible to federal, state and local authorities.
- The *LEA/Community Entity*, volunteers, and community advisors actively seek supplemental financial or material support from parents, businesses, civic organizations, and government and social service agencies to support programming options.
- The afterschool program has access to school equipment, supplies, and resources, including computer and science labs, libraries, classroom facilities, gyms, and playgrounds.

**Standard:** *The afterschool program is supported by provision of professional development opportunities for staff.*

- A current schedule of workshops, seminars, and other development opportunities offered by local schools, universities, churches, and civic organizations is displayed prominently, and staff is encouraged to attend.
- Time and financial resources are provided for attendance at workshops, seminars, and conferences; for subscriptions to professional journals; and for professional interaction with other after-school staff.
- Afterschool staff is included in appropriate development opportunities offered by the school.
- Afterschool staff receives at least 10 hours of in-service training a year in some of the following:
  - Child and adolescent development
  - Recognizing the range of children's abilities
  - Developing multiple activities for a wide range of age and skill levels
  - Understanding cultural diversity
  - Guiding behavior
  - Program management and evaluation
  - Leadership traits and behavior
  - Communication skills
  - Group processes
  - Effectively working with families
  - Identifying and working with special needs children
- Afterschool Site Coordinator/Project Director meets regularly with staff to provide continuous feedback and supervision and to determine in-service needs.

**Standard:** *The School/Community Entity supports safe transportation to and from after-school programs.*

- School/Community Entity makes every effort to provide safe and free or low-cost transportation to and from the afterschool program.
- High standards are maintained for vehicle and driver safety and in selection of sites for drop-off and pick-up.

- Systems and procedures are in place for advance notification of changes in pick-up and drop-off routines for children.

**Standard:** *School/Community Entity and afterschool staffs demonstrate respect for the importance of both school and afterschool experiences in children's development.*

- School/Community Entity and afterschool staffs create a welcoming environment for children and their families by accommodating reasonable request and taking concerns or suggestions through proper channels.
- A clear set of expectations for children's behavior is developed consistent with the needs, goals, and philosophy of both the school and afterschool program.
- School/Community Entity and afterschool staffs show professional respect for one another.
- Liaisons from the School/Community Entity and afterschool staffs maintain a flow of information by holding regular meetings to identify complimentary goals, determine desired results and goals individual children, work toward a broad curriculum approach, and share and reflect on successes and challenges.
- School principal and the site coordinator/program director work together to encourage and facilitate the process of change and innovation.
- School principal and the site coordinator/program director work to prevent or resolve problems.
- School and afterschool staffs promote consistent school day and after-school practices that reflect and celebrate diversity

*The above Quality Indicators were reproduced with permission from the Educational Products Department of the National Association of Elementary School Principals.*

## **Best Practices**

The following list of *Best Practices* or *Considerations* is provided by the combined efforts of the ALSDE Technical Advisors. Their many years of experience have allowed them to deal with many issues and have enabled them to advise grantees regarding potential pitfalls.

### **Finances**

- No matter the role or position, be familiar with all aspects of the budget. This will serve as a guide regarding the expenditure of money for the various facets of the program.
- The budget can and should be revised as needed throughout the fiscal school year, but the last revision permissible must be submitted to the ALSDE no later than June 15<sup>th</sup>. Money *cannot* be spent prior to being submitted and approved by the ALSDE.
- All expenditures of funds must follow approved system guidelines (Schools – LEA stipulations / Community Entities – Board approval) .... usually submitted, approved, and filed by purchase order.
- A **line item** within the budget *may* be exceeded by up to 10% without a revision being submitted.

- Budgetary and financial questions should first be addressed with the ALSDE assigned Technical Advisor and the local LEA Chief School Financial Officer of the applicable system, or the Community Entity's Accounting Department. If a resolution is not found, the grantee should then defer to the ALSDE.
- Community Entities should attempt to abide by the guidelines of the applicable LEA system. By seeking the counsel of both the LEA system and their individual governing boards, financial issues should promptly be resolved.
- Administrative and Indirect Costs *cannot* exceed 20% of the approved grant for the fiscal school year.
- If expenses become necessary in an area of the budget where *no monies have been allocated*, it cannot be revised after-the-fact to include money in that area.
- If tuition and fees are assessed, they should be reasonable and based on a sliding scale as related to the "free, reduced, or full-priced" meals system of the *Child Nutrition Program (CNP)*. Remember, if a family cannot pay, their children cannot be denied access to the program.
- If tuition and fees are assessed, a collection system must be established, and all monies collected must be receipted. A grantee should follow the system-wide policy for accountability purposes. Most systems require that all money received through a program be accounted for through the system's central offices.
- Tuition and fees should be kept in a separate account for the appropriate maintenance, and the monies should only be spent for the 21<sup>st</sup> CCLC program purposes.
- Procedures for late fee payments, bad checks, and non-payment of fees should be established and enforced. Some systems allow parents/guardians to volunteer in lieu of payment, if deemed necessary and appropriate. If this practice is utilized, it must be equally administered in a fair and congruent manner.
- If scholarships or a waiver of fees are made available for some students, the policy must be consistent for all those who qualify. Documented, established guidelines should be in place to ensure continuity.
- Scholarships awarded *cannot* be charged back to the grant and deducted accordingly from federal funds.
- Individuals or businesses will sometimes sponsor a student. This can be a method of community involvement. The partner should receive a tax credit at year's end.
- 21<sup>st</sup> CCLC funds *cannot* be utilized for fundraising activities.

### Staffing

- The major key to the success of a program is hiring the right staff. It must be clearly communicated, "This is not a babysitting service."
- Pay and compensation must be comparable to the fair market standard. However, compensation cannot and must not be excessive.
- To prevent staff burnout, their schedules can be regularly or periodically rotated. For example, MWF and T/TH scheduling; and/or alternate days from week to week.
- It is recommended that the budget reflect more staff positions than needed initially. The budget can be revised later, if necessary, to delete some of these positions.

- All staff members must receive 10 hours of verifiable training each year. Records must be maintained for evaluation purposes.
- All staff members must be very familiar with the goals and objectives of the program as outlined within the original application.
- Staff members should understand that the 21<sup>st</sup> CCLC program works in conjunction with the school(s) served; but it is not merely a continuation of the school day. The students should enjoy attending and look forward to participating in the program.
- Staff should plan daily, weekly, and monthly activities and maintain complete documentation.
- Regular communication between staff and the regular classroom teachers should be maintained and documented.
- College students or qualified high school students can be utilized as aides where appropriate; however, volunteers and student workers under the age of 21 years-of-age or older cannot provide student supervision without an adult being present.
- Time sheets for every staff member must be completed and filed accordingly. All time sheets must be approved and signed by the Site Coordinator/Program Director. Each applicable board must have approved hours recorded on all time sheets. (LEA – School Board / Community Entities – Governing Board)
- Daily staffing should be based upon actual student attendance numbers. (i.e., Lower attendance = Fewer teachers)

### **Students**

- The maximum teacher-to-student ratio in a 21<sup>st</sup> CCLC program can be no greater than 1:15.
- Procedures for dealing with behavioral or disciplinary problems must be established and in accordance with the applicable Board's policies.
- Behavioral policies should be well documented so students, parents, and staff are fully aware of them and the consequences of disciplinary infractions.
- A signed agreement between the program, parents, and students acknowledging their understanding and compliance with all policies, rules and guidelines should be on file. A Parent/Student Handbook is highly advisable.
- Attendance is not mandatory; however, guidelines should be in place should students abuse the privilege of attending.
- Grouping of students by age, grade level, and/or interests for certain activities, etc. is highly advisable.
- If special needs students will be in attendance, a plan must be in place to accommodate their requirements.
- Participation is a privilege, not a right. Disciplinary problems will not be rewarded with continued attendance.

### **Academics and Enrichment**

- The US Department of Education requires that all 21<sup>st</sup> CCLC programs offer language, reading, and math skills enrichment activities as part of their agenda. With imagination and creativity, the possibilities are unlimited.

- Homework assistance can be an integral part of the daily and weekly schedule. Targeted homework time allotment should not exceed 20 minutes.
- Remediation activities to supplement a students' learning should be provided. This will require continual communication with the classroom teacher(s) and a spirit of collaboration.

### **Communication and Publicity**

- Keeping the lines of communication open with the superintendent, principals, (all those in leadership), parents, and community members is absolutely essential.
- Progress reports, notes sent home, and personal one-on-one contacts with parents will not only effectively communicate the program's initiatives, but they will also help with *word-of-mouth* publicity.
- An Advisory Council can assist with publicity and community awareness suggestions. The council must meet at least twice a year. The agenda and minutes of the meeting must be available for review by the ALSDE and filed accordingly.
- At the beginning of the program, the community and parents must be well informed. (i.e., the purpose and mission, the first day, fees, activities, etc.)
- Communication can be done in many forms...flyers, letters home from school administration and/or program director, newspaper articles, press releases to the local radio and TV station for public service announcements, church bulletins, handbills in grocery bags, etc.
- Federal and state reports are useful information for the dissemination of publicity.
- Family involvement can be enhanced with activities for the entire family of 21<sup>st</sup> CCLC participants. For example – GED, computer, or parenting classes, special programs, etc.
- Changes in any programming details should be immediately and comprehensively detailed to all those involved.

### **Resources**

- Not only should grantees utilize physical resources wisely, but they should leverage community relationships wisely as well. Grantees should reach out to the Cooperative Extension Services, civic clubs, charitable organizations, church groups, governmental agencies, fire and police personnel, etc.
- Volunteers should be incorporated into the program when appropriate. Screen and select them carefully. Examples include college students, senior citizens, grandparents, business professionals, etc. Volunteers should ***never*** be left alone to supervise students.

### **Additional Considerations**

- It is highly advisable to involve the state *Child Nutrition Program* for providing snacks to the students in the program.
- Coordination of Title I monies may be available to supplement initiatives of the program. Check with the LEA superintendent and CSFO for guidance.
- There should be a documented sustainability plan that reflects how the program will survive and grow after the grant money is no longer available.



- Determine in advance whether the program will operate during holidays, spring break, and summer. A plan must be developed if the program is not going to strictly adhere to the school calendar. This plan must be approved in advance by the ALSDE.
- Daily and weekly transportation costs can oftentimes become *cost prohibitive* (field trips excluded). If the intention is to transport students *to and from* the program, the grantee may want to consider having a designated drop-off/pick-up site for parents to coordinate their efforts – rather than a house-to-house delivery system.
- Each site should have several members of the staff trained in CPR and First Aid Safety concerns should be addressed from the beginning; and the local policies related to the administering of medications, illness, fire and tornado drills, accidents, intruders, etc. followed.
- There should be some form of *outside* communication plan for alerting parents, families, and the community should an emergency arise. Several programs utilize walkie-talkies for internal communication and find them to be quite useful.
- Students can **only** be released into the care of their designated parents or a pre-approved designee. The name(s) of the person(s) to whom the care of a student can be transferred must be available, and a request for photo identification is still necessary at the time of pick-up. A sign-out sheet must be maintained and must include the name of the person picking up the student, the time of dismissal, and the date. If it is a designee, a driver's license, phone number, or other information may be required.

## Program Operations

The ALSDE requires elementary schools (or 21st CCLC sites that serve elementary Grades K-6) to be open five days per week for a minimum of ten contact hours, Monday-Friday, for the entire regular school year. If the 21st CCLC site serves middle school and/or high school students, the site should be open three to five days per week for a minimum of six contact hours, for the entire regular school year. Operation during school holidays, weekends, summer, and other school breaks is a local decision, recognizing that desired results are directly related to the amount of contact time with students. ***Please note: No student activities are allowed during regular school hours.***

Federal guidance indicates that students are the intended beneficiaries of the project; however, the U.S. Department of Education believes that younger children who will become students in the schools being served can also participate in project activities designed to get them ready to succeed in school. While some 21st CCLC funds might be used for projects that include preschoolers, an entire project may **not** be directed to preschoolers because the intent of the legislation is to focus on the school-age population and their families.



## Fiscal Oversight and Responsibility

### **Foundation**

Receiving federal and state funding for the care and oversight of children requires tremendous responsibility and accountability. It is an ongoing process that demands consistent and continual supervision and attention. To accomplish this directive, the grantee must begin with the correct foundation.

When building a house, one must diligently "*count the cost.*" The grantee must determine the true cost of providing a quality program for all students and their respective families. Remember, 21<sup>st</sup> CCLC funding is considered "*seed*" money and is not intended to establish the program from its inception. The grantee must have the capacity to operate a before or afterschool program, realizing the 21<sup>st</sup> CCLC grant cannot and must not be its sole source of income. The ALSDE will assist the potential grantee in determining its true capacity to ensure success and sustainability.

Additionally, as stated previously in the *Preparatory Procedures - Planning Strategies* portion of the 21<sup>st</sup> CCLC manual, one valuable tool for determining the true cost per child can be found on the following website:

<http://www.wallacefoundation.org/cost-of-quality/Pages/default.aspx>

Though this instrument is a very valuable resource, it is merely a tool to be used as the grantee *estimates* what the overall expense will be. Please keep in mind, it cannot account for *every* incidental variable.

### **Financial Management**

The grantee must establish and adhere to sound financial management practices that continually consider and remain consistent with the following:

- Federal laws, regulations, and guidance
- Alabama state statutes, fiscal rules, and responsibilities
- Generally accepted accounting and finance principles

Sound financial management practices reasonably ensure that the fiscal impact of the grantee's operations are planned, controlled and accurately recorded and accounted for according to ALSDE rules, guidelines, and specifications.

All fiscal transactions should comply with applicable laws, grant stipulations, and donor restrictions.

A system of *Internal Controls* must be implemented to ensure the successful implementation of effective financial management.

All grantees are entrusted with the responsibility of preserving and administering Alabama state resources and using these resources in a prudent manner for their designated purposes as provided by federal and state laws.

### **Fiscal Transactions**

Each individual who **personally participates** in any fiscal transaction must ensure the following checks and balances are performed:

- All individuals involved have proper authorization
- Specific to any expense transaction, there are adequate funds allocated within the *approved* budget to cover the transaction
- Reasonable consideration is given to the impact of the transaction to the overall program
- Transaction is timely and properly recorded and in accordance with the ALSDE financial system
- All original and corresponding documentation are correctly verified and filed
- It is recommended for accountability purposes that transactions be confirmed by at least two signatures – preferably a supervisory signature should be included (Please adhere to the applicable LEA's and/or Community Entity's governing board procedures.)
- Supervisors must be responsible for properly informing all *employees* of the LEA's/Community Entity's fiscal transaction policies and procedures.

### **Internal Controls**

To ensure and maintain much needed Internal Controls, Principals, Site Coordinators/Directors, Supervisors, etc. should continually ask the following questions:

- Have *all* employees (Exempt, Non-exempt, Volunteers) been properly trained and instructed regarding their role in the program's fiscal responsibility?
- Have I provided adequate guidance and direction regarding spending practices to those in my charge through ongoing conversations, daily operations, and performance reviews?
- Have I explained to everyone involved with our program that they will be held personally accountable for their actions when processing fiscal transactions?
- Have I set the tone for ethical conduct and integrity avoiding the very *appearance* of impropriety?
- Have I ensured that my own delegated approval authority is consistently carried out properly?
- Are duties segregated so that no *one* individual controls all phases of a transaction?
- Are the authorization and record keeping procedures adequate to achieve accuracy and reliability of accounting data and other management information?
- Is there compliance with all applicable laws, regulations and rules, as well as, with contracts, grant guidelines and specifications, and donor restrictions?
- Is there a process to inform in a proper and timely manner all constituents of the appropriate handling of financial matters for the program?
- Are all assets - including facilities, data, equipment, supplies, inventory, accounts receivable, and cash (to include - checks and credit card payments) - protected from unauthorized access or theft?

- Is there a viable process of continuous assessment and adjustment for any changes or revisions that would affect accountability and internal controls?
- Have I voiced or reported any concerns to the ALSDE to preserve program compliance and success?

### **Budgetary Procedures**

The budget is the grantee's roadmap to fulfilling the mission of the program. It is the projected plan through which ideas are translated into expenses. Through diligent planning a comprehensive budget can accomplish the following:

- Help refine the program's goals while reflecting realistic resources.
- Compel everyone working with the program to use funds wisely and efficiently.
- Provide accurate information to adjust, analyze, and evaluate programs and activities.
- Aid in decision-making.
- Provide a historical reference to be used for future planning.

### **Basic Budgetary Components**

- A mission statement of the program's goals, objectives and priorities. This should be considered a *Budgetary Narrative*.
  - What do we want to accomplish?
  - How will we accomplish this?
  - How much will the program cost?
  - Other than the 21<sup>st</sup> CCLC Grant, how will the program be funded?
- A specified time period to which the budget applies (i.e., ALSDE fiscal school year/Oct. 1 – Sept.30)
- A method of reviewing budget plans and procedures
- Budgeted financial statements: An estimated detailed income breakdown and an estimated detail expense breakdown

### **Developing a Budget**

- When establishing the program, preparations must begin well in advance because the process will take quite some time to ensure a thorough plan.
- For established programs, preparations should begin several months prior to the close of the current fiscal year.
- Research and adhere to the individual LEA and/or Community Entity governing board policies regarding expenditure deadlines. Remember to keep in mind summer programs as well.
- Prepare a comprehensive outline of the program's planned activities for the upcoming year.
- Determine available funds (annual income, cash on hand and funds in the bank, interest, etc.).
- Do careful studies of funding sources, costs, estimated and probable fundraisers.
- Estimate anticipated income and when it is expected to be available (fees, grants, annual gifts, donations, etc.).

- Define needed expense (curricula, materials and supplies, hardware, software, advertising, printing costs, etc.).
- Get price quotations on certain expenditures and delegate certain responsibilities to ascertain anticipated costs.
- Adhere to State Bid laws – check with the purchasing department of LEA regarding this matter.
- Rank in order by relative importance, which activities and initiatives are the wisest expenditure of funds.
- All costs must be directly correlated to the needs, goals, and objectives of the program.
- Remain cognizant of how much is available to be allocated for each necessary line item.
- Negotiate as necessary while eliminating less essential expenditures and limiting others.
- Revise, review, coordinate, cross-reference, and then assemble income and expenditures into a final budget.

### **Managing the Budget**

- Once prepared, approved, and adopted, the budget must be closely managed.
- Formulate general policies and procedures needed to achieve objectives.
- Keep an accurate log of financial transactions (income and expenses) - maintain in an organizational record book - check and balance records periodically.
- As stated previously, internal controls must be established for safeguards and accurate accounting data -- this encourages adherence and accountability.
- Control cost -- allow only approved expenditures.
- Habitually assess the budget numerous times during the budgeted period.

## **Budgetary and Expenditure Reporting**

### **LEAs**

Each LEA system has a Chief School Financial Officer (CSFO). Many budgetary and financial questions can be answered by the CSFO. If greater insight and further clarification are needed, ALSDE and/or the program's assigned Technical Advisor are always available to assist the grantee.

To ensure budgetary compliance and accountability, LEAs are responsible for posting their comprehensive budget to the state eGAP system with the submission of their initial or continuation application (RFA) each fiscal year. The budget will in turn be reviewed/approved/not approved by the ALSDE with recommended changes and revisions. Monies cannot be spent prior to the budget being approved.

Revisions may be submitted via eGAP throughout the fiscal year. However, all revisions must be reviewed, discussed, and approved by the assigned Technical Advisor before submitting them to the ALSDE for approval.

### **For CSFOs only**

*Both the budget and expenditures must be updated and recorded in McAleer, the state's electronic accounting system. Alabama state law stipulates McAleer must be regularly updated within **45 days** of the end of each month. All requisition orders, receipts, bills of sale, and any other corresponding, supporting documentation pertaining to purchases and expenditures must be maintained and filed accordingly. <http://www.aasbo.com/>*

### **Community Entities**

Each Community Entity must have their own established financial and budgetary systems in place prior to applying for the 21<sup>st</sup> CCLC grant. Policies and procedures should be established in general accordance with the aforementioned parameters provided within this section of the manual.

To ensure budgetary compliance and accountability, Community Entities are responsible for posting their comprehensive budget to the state eGAP system with their initial or continuation application (RFA) each fiscal year. The budget will in turn be reviewed/approved/not approved by the ALSDE with recommended changes and revisions. Monies cannot be spent prior to the budget being approved.

Revisions may be submitted via eGAP throughout the fiscal year. However, all revisions must be reviewed, discussed, and approved by the assigned Technical Advisor before submitting them to the ALSDE for approval.

All expenditures must be submitted to the ALSDE Accounting Department on a month-by-month basis. All requisition orders, receipts, bills of sale, and any other corresponding, supporting documentation pertaining to purchases and expenditures must be maintained and filed accordingly.

*\*\* For both LEAs and Community Entities, documentation will be examined regularly by the ALSDE and the program's assigned Technical Advisor. \*\**

### **Additional Budgetary Considerations**

- Everything within the budget and expenses must be properly allocated to the correct line item and duly traceable through documentation.
- Administrative and Indirect Costs may not exceed the ALSDE allowed administrative cap. (Please refer to the following section for greater clarification.)

## **Administrative and Indirect Cost Allowances**

**Administrative Costs** are defined as expenses directly related to the salaries and benefits of the following individuals and/or those responsible for the effective *management* and *leadership* of the CLC program: Program Director, Site Coordinator, Secretary, Financial Officer, Bookkeeper, etc. By ALSDE definition, administrative costs are considered one type of *Indirect Costs*.

A few considerations when allocating administrative funds:

- Although eGAP allows grantees to allocate all salary funding into *Extended Day/Dependent Care*, this is not advisable.
- It is preferable and highly recommended that all 21<sup>st</sup> CCLC administrative salaries be allocated under *General Administrative*. This allows for transparent traceability and accountability. This should be applicable to the Budget Narrative as well.
- Community Entities – Whatever accounting system is utilized with their organization, this same type of transparency is highly advisable and recommended.
- Job Descriptions must be *truly* reflective of job duties and responsibilities. In other words, unless administrators are genuinely performing teaching/instructional responsibilities including abundant face time with the students, their salaries cannot be considered instructional. Therefore, they *must be* deemed administrative and allocated accordingly.
- Salaries and expenses related to the direction and supervision of such functions as instruction, guidance, attendance, transportation, community services, and student services are not indirect costs.

**Indirect Costs** are defined as those costs of a general nature which are not readily identifiable with the activities of the grant; but are, nevertheless, incurred for the joint benefit of those activities and other activities or programs of the organization.

Indirect costs are costs meeting the following criteria:

- Incurred for a common or joint purpose benefiting more than one cost
- Not readily assignable to the cost objectives specifically benefited, without effort disproportionate to the results achieved.

As used in the calculation of a restricted indirect cost rate, occupancy and space maintenance costs means such costs as:

- Building costs whether owned or rented
- Janitorial services and supplies
- Building, grounds, and parking lot maintenance
- Guard services
- Light, heat, and power
- Telephone, fax, and other communication services

**\*\* All grantees must not exceed a 20% allocation for Administrative/Indirect Costs. \*\***

**\*\* Additionally, LEAs must use their LEA-assigned Administrative/Indirect Cost % rate and must not exceed this allocation. \*\***

A complete explanation of *Indirect Costs* can be found in the document provided by the ALSDE at the following link: **(Please be advised: This information is updated periodically/annually)**

<https://publicdatareports.alsde.edu/leareports/default.aspx>

After reviewing the information provided therein, it is understandable why clear comprehension can be quite a challenge. LEAs, please remember CSFOs are an endless resource and can provide indispensable insight. LEAs and Community Entities, the assigned Technical Advisor and the ALSDE Administrator and staff are always willing to answer questions and offer guidance.

Throughout the years, clarification, examples and FAQs regarding *Indirect Costs* have been requested and given. Though the document above is provided, the possible nuances and enumerable scenarios preclude the ability to address them all. Providing the most useful information and awareness is the primary goal and can best be served by referring grantees to those who have the best comprehensive answers.

***Please consult the ALSDE and/or the assigned Technical Advisor, or the Staff of the Truman Pierce Institute at Auburn University if you have any additional questions.***

## **Necessary, Reasonable, and Customary**

*Just because it's allowable doesn't mean it's prudent nor approvable!*

### ***Necessary***

- Is this cost needed for the performance or administration of the grant?
- Does this cost follow sound business practices?
- Does this cost reflect a fair market price for comparable goods or services?
- Do I really need this to administer the program?
- Is this the minimum/maximum amount needed to meet the needs of the students?

### ***Reasonable***

- Is this cost targeted to valid programmatic/administrative considerations?
- Does our program have the sustainable capacity to use what we are purchasing for this program?
- Did we pay a fair market rate and can we prove it?
- If this expense were in the local newspaper "headlines," would I be comfortable or completely embarrassed?

## **Allowable & Non-Allowable Expenses**

The following specifications are taken directly from the *Non-Regulatory Guidance* provided by the federal government. (*Under Revision by the ED, October 2017.*)

Each eligible organization that receives an award may use the funds to carry out a broad array of before- and after-school activities (or activities during other times when school is not in session) that advance student achievement. In the Department's view, local grantees are limited to providing activities within the following list:

- Remedial education activities and academic enrichment learning programs, including providing additional assistance to students to allow the students to improve their academic achievement

- Mathematics and science education activities
- Arts and music education activities
- Entrepreneurial education programs
- Tutoring services (including those provided by senior citizen volunteers) and mentoring programs
- Programs that provide afterschool activities for limited English proficient students that emphasize language skills and academic achievement
- Recreational activities
- Telecommunications and technology education programs
- Expanded library service hours
- Programs that promote parental involvement and family literacy
- Drug and violence prevention programs, counseling programs, and character education programs

Academic enrichment can include tutoring in core academic subjects and provide extra learning opportunities that provide students with ways to practice their academic skills through engaging, hands-on activities.

Such activities might include some of the following:

- Chess clubs – to foster critical thinking skills, persistence and other positive work habits
- Theatre programs – to encourage reading, writing and speaking as well as teamwork, goal- setting and decision-making
- Book clubs – to encourage reading and writing for pleasure
- Cooking programs – to foster the application of reading, writing, math and science skills
- Poetry contests and slams – to encourage reading, writing and speaking
- Woodworking programs – to encourage planning, measurement, estimation and other calculation skills
- Computer clubs – to encourage the use of graphics, internet skills, print and newspaper publishing; to promote writing, editing, and knowledge of and comfort with technology

These types of enrichment programs are consistent with evidence of the importance of constructive learning activities during non-school hours.

**For example, researcher Reginald Clark found that economically disadvantaged youth who participated in constructive learning activities for 20-35 hours per week performed better in school than their more passive peers.**

Note when reviewing these specifications, programs are given a wide berth regarding the opportunities they may provide students and their families.



***To assist with compliance and further insight, a list of "Allowable and Non-Allowable" expenditures is contained in the next section. A complete comprehensive list does NOT exist. This list is only to be used as a guide, and NOT to be considered exhaustive. When questions arise and further clarification is needed, the grantee must defer to the ALSDE and the assigned Technical Advisor for guidance. If in doubt...ASK!***

## **Allowable and Non-Allowable Expenses Chart**

*The following summary is provided for the grantee's convenience and is to be utilized as a "guide" only. The ALSDE does not accept responsibility for Grantee interpretation of the Cost Principles from EDGAR as outlined below. Prior to expending funds, grantees should consult all applicable laws, the ALSDE, and their assigned Technical Advisor. All costs must be budgeted and approved on the original Grant Application (or Revision) prior to expenditure. Some costs, even after the original Grant approval, will **require specific approval** from ALSDE prior to the expense.*

| <b>Items of Cost</b>   | <b>In accordance with the uniformed publication of the Office of Management and Budget (OMB) Circulars, the following list is obtained from EDGAR. The regulations are applicable across all federal agencies and organizations, flow-through state agencies, and federal grantee recipients.</b>         |
|--|---|
| <b>Accounting</b>  | Allowable – <b>§200.302 - §200.303</b>  |
| <b>Advertising</b>   | Allowable for recruitment of grant personnel; procurement of goods and services; and disposal of surplus materials and any other specific purpose necessary to meet the requirements of the Federal award – <b>§200.421</b>   |
| <b>Audit Services</b>  | Allowable for audits conducted under the <u>Single Audit Act</u> , now addressed in the consolidated OMB Circulars.   |
| <b>Award for Participation</b>   | Although not specifically addressed in EDGAR, allowed when necessary to accomplish program objective.<br><br>Acceptable awards include certificates, plaques, ribbons, and small trophies nominal in cost, or inexpensive instructionally related items such as pens/pencils to be used in the classroom. |
| <b>Bad Debts</b>   | Unallowable – <b>§200.426</b>   |
| <b>Bonding Costs</b>   | Allowable for employees who handle grant funds when in accordance with sound business practices – <b>§200.427</b>   |
| <b>Communication</b><br>(may include telephone, FAX, postage-mailing services, electronic communication, etc.) | Allowable – <b>§200.421(2)</b>  |

| Items of Cost  | In accordance with the uniformed publication of the Office of Management and Budget (OMB) Circulars, the following list is obtained from EDGAR. The regulations are applicable across all federal agencies and organizations, flow-through state agencies, and federal grantee recipients.  |
|--|---|
| <b>Compensation for Personnel Services</b> (may include salaries, wages, and benefits)                     | Allowable if costs are reasonably comparable for similar work & charges are supported with time distribution records and other documentation as stipulated throughout EDGAR.<br><br>Accurate time sheets that reflect actual hours worked must be maintained and filed accordingly - <b>§200.430 – 200.431</b>  |
| <b>Construction or remodeling</b>  | Unallowable – <b>§200.439(3)</b>  |
| <b>Contributions/ Donations to others</b>  | Unallowable – <b>§200.434</b><br><i>* Ex.-Grant money cannot be donated to receive free publicity or acknowledgment. (i.e., Ad in a Yearbook, etc.)</i>   |
| <b>Criminal Background</b>   | Allowable – <b>§200.430</b>   |
| <b>Defense, Prosecution, Claims and Appeals</b>  | Unallowable – <b>§200.435</b><br>Unallowable for prosecution of claims against federal or state governments and agencies ( <i>Be advised: numerous stipulations apply.</i> )  |
| <b>Depreciation and Use Allowance</b>  | Allowable based on acquisition cost as stipulated in EDGAR – <b>§200.313</b><br>Please defer to the <i>Closeout Procedures</i> for very detailed specifications.  |
| <b>Disbursing Service</b>  | Allowable – <b>§200.300 - §200.309</b> <ul style="list-style-type: none"> <li>• Allowable for cost of disbursing funds by the CFSO, treasurer or other designated officer</li> <li>• Accurate time sheets that reflect actual hours worked must be maintained and filed accordingly</li> <li>• These hours must be allocated as a line within the budget and must fall within the ALSDE Admin allowance.</li> </ul> |
| <b>Displays, Demonstrations, and Exhibits</b>  | Allowable – <b>§200.461</b>   |
| <b>Employee Benefits</b>   | Allowable – <b>§200.414, 430, 431, 437</b>  |
| <b>Entertainment</b> (Including amusement, diversion, social activities, ceremonials & any cost with such) | Unallowable – <b>§200.438</b>   |

|  |   |
|--|---|
| <b>Items of Cost</b>   | <b>In accordance with the uniformed publication of the Office of Management and Budget (OMB) Circulars, the following list is obtained from EDGAR. The regulations are applicable across all federal agencies and organizations, flow-through state agencies, and federal grantee recipients.</b>                 |
| <b>Equipment &amp; Other Capital Expenditures</b><br>(includes shipping cost and ancillary charges)  | The federal Capital Expense threshold is much higher than the Alabama State mandated allowance. Therefore, no OMB Circular citation is warranted.<br><br>Capital expense is defined by the ALSDE, as items that cost greater than \$5000 per unit and require specific approval from the ALSDE prior to purchase. |
| <b>Executive Lobbying Costs</b>  | Unallowable – <b>\$200.450</b>  |
| <b>Field Trips</b>   | Although not specifically addressed in EDGAR, <b>educational</b> field trips are allowable when directly related to a teacher's lesson as part of instructional strategies, and when necessary to meet program objectives. Limited to <i>in-state</i> travel <b>only</b> , without ALSDE approval.                |
| <b>Fines and Penalties</b>   | Unallowable – <b>\$200.441</b><br>Unallowable, except when incurred as a result of compliance with specific federal award provisions.   |
| <b>Food Costs</b>  | Although not specifically addressed in EDGAR, food costs are allowable for students & participants as long as they are necessary & reasonable to accomplish the goals & objectives of the program. *  |
| * The ruling regarding food varies from state to state. ALSDE allows the purchase of food for students within reasonable boundaries. ALSDE highly recommends the incorporation of the state's <b>Child Nutrition Program</b> as a collaborative partner for healthy snacks, etc. As examples, ALSDE views trips to The Golden Corral, Dairy Queen, etc. as <b>unacceptable</b> . |   |
| <b>Fundraising, including financial campaign and solicitations of gifts, donations, contributions</b>  | Unallowable – <b>\$200.442</b><br>* Grant money cannot be spent to raise money. (Ex. Buying materials to raffle)  |
| <b>Goods and Services for personal use</b>   | Unallowable – <b>\$200.445</b>  |
| <b>Hospitality Rooms</b>   | Unallowable – <b>\$200.432</b><br>Ex. – Banquet Halls, etc. for hosting Events, hotel rooms for program guest. Such expenses are permissible for the ALSDE, but not flow-through sub-recipient awardees.  |

| Items of Cost  | In accordance with the uniformed publication of the Office of Management and Budget (OMB) Circulars, the following list is obtained from EDGAR. The regulations are applicable across all federal agencies and organizations, flow-through state agencies, and federal grantee recipients. |
|--|--|
| <b>Housing and Personal Living Expenses</b>                                    | Unallowable – <b>§200.445</b><br><i>Housing allowances and living expenses must be pre-approved by the ED. No 21<sup>st</sup> CCLC sub-recipient would be eligible for such consideration.</i>   |
| <b>Insurance</b>   | Insurance is allowable when pursuant to the grant and when in accordance with governmental unit's policy and sound business practices. – <b>§200.447</b>   |
| <b>Lobbying</b>  | Unallowable – <b>§200.450</b>  |
| <b>Maintenance, Operations, and Repair</b>                                     | Maintenance and operation of <i>building space</i> used for grant activities is allowable to maintain property's functionality as specified in EDGAR. – <b>§200.452</b>  |
| <b>Materials and Supplies</b> (includes Shipping costs)                        | Allowable, while bearing in mind the stipulations of <i>Reasonable and Customary</i> . – <b>§200.453</b>   |
| <b>Meetings/Conference</b>   | Allowable for dissemination of information related to the grant. <b>§200.432</b><br><i>(i.e., Parent, School, Community meetings, etc.)</i>  |
| <b>Memberships</b>   | Allowable for membership with business, professional, and technical organizations related to the grant. Membership must be in the name of the grantee organization and not in the name of an individual. <b>§200.454</b>   |
| <b>Memorabilia</b>   | Unallowable – <b>§200.421</b> and <b>§200.467</b>  |
| <b>Pre-Award (Pre-Agreement) Costs</b>   | Unallowable unless specific approval is given by the ALSDE. – <b>§200.458</b>  |
| <b>Professional Development</b>  | Allowable – <b>§200.430</b> and <b>§200.459</b>  |
| <b>Promotional Items</b> (such as t-shirts, caps, tote bags, key chains, etc.) | Unallowable – <b>§200.421</b><br><i>ALSDE allows the purchase of 1 T-shirt with the 21st CCLC logo prominently displayed for identification and safety purposes.</i>   |
| <b>Proposal Cost</b> (i.e., preparing Grant application and proposals)         | The ALSDE in accordance with ED regulations, does <b>not</b> allow costs of preparing grant applications/proposals for competitive discretionary grants.<br><br>Additionally, grant funding <b>cannot</b> be utilized for preparing applications/proposals to obtain grant monies.         |

|  |   |
|--|---|
| <b>Items of Cost</b>   | <b>In accordance with the uniformed publication of the Office of Management and Budget (OMB) Circulars, the following list is obtained from EDGAR. The regulations are applicable across all federal agencies and organizations, flow-through state agencies, and federal grantee recipients.</b>   |
| <b>Public Relations</b>  | Allowable only when specifically required by the grant award for communicating with the public regarding grant activities; or to keep the public informed on matters of public concern and as specified in EDGAR. – <b>§200.421</b><br><br>Costs of public relations designed solely to promote the LEA/Community Entity are unallowable. |
| <b>Publication and Printing Costs</b><br>(includes distribution & mailing of publications) | Allowable – <b>§200.461</b>   |
| <b>Rearrangements and Alterations</b>  | Allowable for ordinary and normal rearrangement and alteration of facilities to accommodate effective facilitation – but not for purposes of capital improvements or construction. – <b>§200.462</b>  |
| <b>Reconversion Costs</b>  | Allowable to restore facility to the condition existing immediately prior to the grant award (less the costs related to normal wear and tear) – but not for purposes of capital improvements or construction <b>§200.462</b>  |
| <b>Recruiting</b>  | Allowable – <b>§200.463</b>   |
| <b>Rental Costs</b>  | Allowable to the extent that the rates are comparable to that of other rental property in the locale of the program; and as specified by the very detailed provisions detailed in EDGAR. – <b>§200.465</b>  |
| <b>Service Learning</b>  | Allowable as it pertains to the implementation of the grant, and in keeping with all other Allowable/Unallowable expense specifications.  |
| <b>Souvenirs</b>   | Unallowable – <b>§200.421</b>   |
| <b>Subscriptions</b>   | Allowable for business, professional, and technical periodicals when related to the Grant. Subscriptions must be in the name of the grantee organization and not in the name of the individual. <b>§200.454</b>   |
| <b>Taxes</b>   | Allowable except for self-assessed taxes. <b>§200.470</b>   |
| <b>Training and Education</b>  | Allowable for the training and development of employees. – <b>§200.430, §200.472 and §200.459</b>   |
| <b>Transportation</b>  | Allowable for the purposes of bus rentals, etc. <b>§200.473</b><br><br>Grant funds <b>cannot</b> be used to purchase buses, vans, etc.  |
| <b>Transportation of Goods</b>   | Allowable for goods directly related to the grant and purchased with grant funds. <b>§200.473</b>   |

| Items of Cost    | In accordance with the uniformed publication of the Office of Management and Budget (OMB) Circulars, the following list is obtained from EDGAR. The regulations are applicable across all federal agencies and organizations, flow-through state agencies, and federal grantee recipients.   |
|------------------|--|
| Travel Costs     | <ul style="list-style-type: none"> <li>• Travel costs are allowable related to expenses for transportation, lodging, sustenance, and related items incurred by employees traveling on official business.</li> <li>• Such costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or in a combination the two – provided the method uses is applied to an entire trip, and results in charges consistent with those normally allowed in like circumstances in non-federally- sponsored activities.</li> <li>• Notwithstanding the provisions of EDGAR, travel costs of officials covered by that section, when specifically related to federal awards are allowable with the prior approval of the LEA.</li> <li>• All LEA grantees <b>must</b> abide by the policies of the applicable LEA Board.</li> <li>• All Community Entity grantees <b>must</b> abide by the policies of the applicable governing Community Entity Board.</li> </ul> <p><b>\$200.474</b></p> |
| Tuition and Fees | <p>Allowable as it pertains specifically to the grantee program.</p> <p>Please refer to the Operations Manual.</p>   |

*This chart is in no way comprehensive – ALWAYS defer to the guidance of the ALSDE and the assigned Technical Advisor prior to the expenditure of funds!*

## Supplementing vs. Supplanting

Though an unpalatable subject at times, it must still be addressed to avoid ambiguity and confusion. So, let's keep it as simple, clear and succinct as possible.

The majority of this information is primarily applicable to LEAs.

### **A Little Clarity**

The term “*supplement*” is defined as “to add to” while the term “*supplant*,” means “to replace or take the place of.”

Both federal and state laws require that 21<sup>st</sup> CCLC program funds be used to supplement (increase), but not supplant (replace), the existing level of federal, state, local and other non-federal or state funds that have been available to conduct before- and after-school program activities.

- Grant (categorical) funds are additional resources to provide targeted services beyond the basic educational program.
- Grant (categorical) funds do not replace nor are they a substitute for state and local expenditures.
- Using federal funds to substitute or replace existing or previously existing programs and services funded by non-federal sources (state/local) is considered supplanting.
- Additionally, substituting or replacing funds from other federal/state programs required by law for specific categories of students is considered supplanting.

### **The Rule**

The *Federal Supplement Not Supplant Provision* requires that federal funds be used to augment the regular educational program. They must not be used to substitute for funds or services that would otherwise be provided during the time period in question.

The statute requires that state and local educational agencies (SEAs and LEAs) use federal funds received through entitlement and competitive funding only to *supplement* the amount of funds available from nonfederal sources for the education of students and applicable programs. The SEA and LEA cannot use these federal funds to *supplant* funds that would, in the absence of federal funding, have been spent to provide for students and their families through the 21<sup>st</sup> CCLC program.

### **Bottom Line**

**For the time period in question (the life of the grant during that fiscal school year), what would have occurred in the absence of federal funds?**

**The SEA and/or LEA must demonstrate that it would not have provided the services in question with non–federal funds had the federal funds not been available.**

### **Examples and FAQs**

- An agency may increase (supplement) its existing state-funded student enrollment in an Afterschool program by using new federal or state funds to increase the number of students in the program.
- A school district currently funds the librarian’s salary during the hours of 3 p.m. to 7 p.m. with State general funds. Now that the district is approved for a 21<sup>st</sup> CCLC grant, the district would like to use these grant funds to pay for the librarian’s salary during the hours of 3 p.m. to 6 p.m. The district may not use 21<sup>st</sup> CCLC funding to pay for the librarian’s time, because this would be supplanting.
- Last year the LEA used state and local funds to provide a writing program for an Afterschool Program (i.e., specialized teacher, materials, assessments, etc.). This year the LEA wants to use 21<sup>st</sup> CCLC funds to continue the program. This could be considered supplanting.

**Question:**

May 21<sup>st</sup> CCLC funds be used to enhance an existing program (e.g., hire additional teachers)?

**Answer:**

Yes. 21<sup>st</sup> CCLC funds may be used to enhance an existing After School Education or 21<sup>st</sup> CCLC program if the program expands to serve additional students and/or schools/sites.

**Question:**

How will the ALSDE monitor programs for compliance with the “supplement not supplant” requirement?

**Answer:**

The ALSDE provides technical assistance directly and through an assigned Technical Advisor. Additionally, ALSDE conducts Compliance Assistance Monitoring. The process consists of data and document review and onsite visits to determine compliance with requirements for each categorical program, including before and after school programs.

**Question:**

Can 21<sup>st</sup> CCLC grantees use funds from other federal, state and local programs that have related purposes?

**Answer:**

Yes. The US Department of Education and the ALSDE strongly encourage local programs to identify other sources of related funding and to describe, in its programs plans, how these resources will be combined or coordinated to offer a high quality, sustainable before and after school programs.

**The Key**

- Keep in mind...a determination regarding supplanting is very case specific; and it is difficult to provide general guidelines without examining the details of each situation.
- A tremendous amount of extensive documentation is essential. (i.e., Board notes and minutes, rationale and justifications, collaboration and cooperation of funding, etc.)
- Seek the guidance of ALSDE and/or the assigned Technical Advisor prior to the expenditure of funds...as with most anything else!

**Revisions**

Throughout the school fiscal calendar year, it may become necessary to “revise” or adjust the initial budget which was submitted with the original application. A modification may be needed to meet the program needs and maintain the integrity of the grant application's primary goals and objectives. Revisions must be submitted through the same application process or chain of command. The LEA/Community Entity **must** adhere to the procedures delineated by their applicable system and/or governing board(s).



Revisions should include the following:

- Detailed budgetary delineation
- Detailed narrative justification
- Detailed implementation plan for revised funds

***Prior to submitting a revision to the ALSDE, please allow the assigned Technical Advisor to review all applicable documentation.***

***Final approval from the ALSDE must be complete prior to the expenditure of funds. The responsibility lies with the grantee to follow-up with the ALSDE to secure approval.***

***Please note:*** Though the ALSDE allows revisions throughout the life of the grant, the last revision of the fiscal school year must be submitted no later than June 15th.

*(Some LEA's and Community Entity's governing boards will only allow one to two revisions a year and have very specific regulations regarding their timing and submission. The grantee must defer to these guidelines.)*

## **Carryover**

In accordance with Title IV, Part B statute, grantees may carryover 21<sup>st</sup> CCLC funds not expended during the fiscal year. These funds may be carried over to the following year of the grant award period for Year 1 and Year 2 of the grant's Period of Performance (3-year grant cycle). Legislation does not stipulate the amount or percentage permissible for carryover; however, retaining a significant amount of carryover may indicate that the grantee is having problems with the administration of the 21<sup>st</sup> CCLC program.

For the allowance of the carryover of funds, a grantee must first meet the following criteria:

- Acceptable program performance as evaluated by ALSDE and the assigned Technical Advisor
- Effective implementation of the original approved Request for Application (RFA)
- Grantee's satisfactory scoring results on the ALSDE's *Risk Assessment* Instrument
- Timely submission of an annual continuation application
- Documented compliance with all grant requirements
- Submission of a revised budget for the next fiscal year to include carryover funds
- Three-year grant period has not ended

## **Equipment and Inventory**

When referring to *Equipment and Inventory* policies, all LEA districts/systems and most Community Entities will have established guidelines and procedures, which *cannot* be usurped or overridden. Therefore, within those boundaries additional considerations are delineated here.

For some Community Entities, who have no pre-existing plan, the following will serve as a framework to structure their policies and procedures:

1. Adhere to all financial budgetary guidelines. Purchases may *not* occur without having been budgeted within the original grant application and approved by the ALSDE.
2. Establish a line of command and the order of progression to be followed throughout the process –
  - Assessment of need (Individual and/or committee)
  - Request of purchase (Requisition order)
  - Approval process (Signature of at least 2 individuals – supervisory authorization) (*LEAs follow system's protocol – Community Entities two signatures are advisable for accountability purposes*)
  - Placement of order (Purchase Order Form with PO #; designated individual or department)
  - Filing system (Pre-order, Post-order, Receipt, and Disbursement)
3. Determine procedures to be implemented upon receipt of equipment/merchandise –
  - Point of receipt (Check-in processes, Individual responsible, etc.)
  - Bill of Lading and Purchase Order correspondence
  - Inspection of equipment
  - Inventory ID # assigned to merchandise
  - Labeled as 21<sup>st</sup> CCLC property (when purchased with 21<sup>st</sup> CCLC funds)
4. Document the arrival and disposition of newly acquired product –
  - Individuals assigned responsible for the recording of all inventory information
  - All information pertaining to the merchandise must be recorded in master Inventory Listing
  - The documentation should include the following:
    - Description
    - Serial or manufacturer identification number
    - Original cost
    - Purchase order number
    - Acquisition date
    - Institutional Inventory # assigned
    - Category
    - Location – Building, room, department
    - Department to which equipment is assigned
    - Person to whom the equipment is assigned

***Please note:*** Capitalized equipment (products that cost more than \$5000 per unit) purchases must receive prior approval from the ALSDE. A memorandum of justification must be submitted with the request. The explanation must specify the intended purpose of the purchase, delineate the usage, and demonstrate how it will beneficially impact the program.

If any type of equipment is stolen, a certified police report, which fully lists all properties taken, must be submitted to the ALSDE. Any compensatory insurance payments made to the grantee must be reimbursed to the program.

### **Additional Resources for 21st CCLC Programs**

If you have any additional questions, please reach out to the Federal Programs Office for additional assistance.

# Title V, Part B – Rural Education Achievement Program

## General Information

The Rural Education Achievement Program (REAP) is designed to assist rural school districts in using Federal resources more effectively to improve the quality of instruction and student academic achievement. It consists of two separate programs – the Small, Rural School Achievement (SRSA) program and the Rural and Low-Income Schools (RLIS) program.

### **SRSA – Small, Rural School Achievement Program**

The SRSA program is a rural school initiative with two components –

- 1) Rural Flexibility – the Alternative Use of Funds Authority
  - Rural Flexibility provides eligible local education agencies (LEAs) with greater flexibility in using the formula grant funds that they receive under certain State-administered Federal programs. This portion of the SRSA program is not a grant program and does not provide LEAs with funding.
- 2) The SRSA grant program
  - LEAs eligible to participate in REAP-Flex are also eligible for a grant under the SRSA grant program. The US Department of Education awards SRSA funds directly to eligible LEAs on a formula basis.

### **RLIS – Rural and Low-Income Schools Program**

The RLIS program is an initiative that provides grant funds to rural LEAs that serve concentrations of children from low-income families. Under the RLIS program, the US Department of Education awards funds by formula to State Education Agencies (SEAs) to provide subgrants to eligible LEAs to support a range of authorized activities to support student achievement.

**Under ESSA, LEAs may be found eligible for both programs and must select either SRSA or RLIS.**

## Allocation Process

1. The U.S. Department of Education Office of Rural Education Achievement Program (REAP) sends via email a Master Eligibility Spreadsheet to each state's representative in November. This spreadsheet has directions for completion of highlighted areas.
2. Once the Master Spreadsheet has been completed, it is returned to the Department of Education's data collection page for the REAP program using Max.Gov in December.
3. The determination is then made by the Department of Education regarding each of the LEAs eligibility for the REAP program.
4. The Master Spreadsheet is returned to the State Education Agency (SEA) representative with the LEAs determinations listed.
5. The LEAs that are eligible for both the SRSA and RLIS programs are notified first because they must make a determination as to which program they will participate.

6. Those LEAs are asked to respond to the SEA representative in writing as to which choice they make. If an LEA chooses SRSA grant program, they will follow the SRSA application process and apply directly to the US Department of Education.
7. The SEA representative will notify the state's LEA accounting of that LEAs decision. If they choose the RLIS program, they are left on the master list and are included in the calculations for the subgrants awarded by the SEA.
8. The Master Eligibility is then sent to all other LEAs notifying them of their eligibility status. The LEAs are directed in the notification that if they have questions, they are to contact the SEA representative.
9. If questions do arise, the LEA is given information on how to contact the REAP staff to answer their determination questions.
10. If no LEA questions arise or after LEA questions are addressed, the Master Spreadsheet is sent to the state's LEA accounting section for calculation of the subgrants.

# Title IX, Part A – McKinney-Vento Homeless Assistance Act

## General Information

The McKinney-Vento Homeless Assistance Act was reauthorized under the Every Student Succeeds Act (ESSA) to ensure the educational rights and protections for children and youth experiencing homelessness. ESSA strengthened the support established under the No Child Left Behind Act (NCLB) to address the needs of homeless students. Among the most notable support activities are requirements for:

- The Alabama State Department of Education (ALSDE) and LEAs to review and revise laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, and success in school of homeless children and youth.
- LEAs to use the McKinney-Vento Homeless Assistance Act definition of homeless when identifying and determining which students are eligible for services.
- LEAs to designate a local liaison to coordinate services to ensure that homeless children and youth enroll in school and have the opportunity to succeed academically.
- LEAs to coordinate the local plan required under Title I with the needs of homeless children and youth, including making a mandatory set-aside of funds under Title I, Part A to serve homeless children.
- The ALSDE and LEAs to implement procedures to ensure homeless children and youth receive appropriate credit for full or partial coursework satisfactorily completed while attending a prior school.
- LEA school counselors to assist and advise homeless children and youth to improve college preparation and readiness.
- LEAs to inform unaccompanied homeless youth regarding their independent status on the Free Application for Federal Student Aid (FAFSA).

The McKinney-Vento Homeless Assistance Act guarantees to homeless children the following:

- The right to immediate enrollment in school.
- The right to attend school in school of origin or in the attendance area where the family currently resides.
- The right to receive transportation to school of origin if requested by parents and is in the best interest of the child.
- The right to comparable services as other schoolmates including transportation and supplemental services.
- The right to attend school along with children who are not homeless.
- The posting of homeless students' rights in all schools and other places around the community that low-income families and high-risk families may visit.

## Local Educational Agency (LEA) Responsibilities

Title I, Part A funding requires that each LEA have a state educational agency (SEA)- approved plan coordinated with the McKinney-Vento Homeless Assistance Act. LEAs must include in the local plan required under Title I, Part A, a description of the services the LEA will provide to homeless children, including those services it will provide with funds set aside under ESSA Section 1113(c)(3)(A). As part of the LEA Consolidated Plan in eGAP, LEAs must examine and describe the needs of homeless children and youth in the Comprehensive Needs Assessment. The Comprehensive Needs Assessment informs the activities described in the LEA Consolidated Plan in eGAP. In addition, LEAs must also provide the name and contact information for the individual(s) designated as the LEA liaison for homeless children and youth.

At a minimum, LEAs must:

- Describe the process for the identification and enrollment of homeless children and youth.
- Describe the services to be provided to homeless children and youth.
- Reserve Title I, Part A funds to provide comparable services for homeless children and youth that attend non-Title I schools and provide educationally related support services to children in shelters and other locations where they live.
- Designate an appropriate staff person as an LEA Homeless liaison.
- Develop, review, and revise LEA policies to remove barriers to the enrollment and retention of children and youth in homeless situations.
- Describe the process for ensuring that transportation is provided to homeless children and youth.
- Ensure that accurate data is collected on enrolled homeless children and youth.

## Homeless Liaison Responsibilities

The LEA Homeless liaison is the heart of the LEA Homeless program. It is important that the Homeless liaison have some knowledge and experience in dealing with federal programs, social worker responsibilities, and counseling responsibilities. It is important that the LEA Homeless liaison has knowledge of the LEA, understands the community, has great communication skills, and has a commitment to the Homeless program.

Among other duties, the LEA Homeless liaison must ensure that:

- Homeless children and youth are identified by school personnel and through coordination activities with other entities and agencies.
- Homeless students enroll in—and have full and equal opportunity to succeed in—school.
- Homeless children and youth, their families, and unaccompanied youth receive educational services for which they are eligible, including Head Start, preschool programs administered by the LEA, referrals to health, mental health, dental, and other appropriate services.
- Parents or guardians of homeless children and youth, and unaccompanied youth are informed of educational and related opportunities available to their children and are provided with meaningful opportunities to participate in the education of their children.

- Parents or guardians of a homeless child or youth and unaccompanied youth are fully informed of all transportation services, including transportation to and from the school of origin, and are assisted in accessing transportation services to their selected school.
- Enrollment disputes are mediated in accordance with the requirements of the McKinney-Vento Homeless Assistance Act.
- Public notice of the educational rights of homeless students is disseminated in all schools and other places around the community.
- With the assistance of LEA personnel, implement procedures to ensure homeless children and youth receive appropriate credit for full or partial coursework satisfactorily completed while attending a prior school.
- Ensure LEA school counselors to assist and advise homeless children and youth to improve college preparation and readiness.
- Inform unaccompanied homeless youth regarding their independent status on the Free Application for Federal Student Aid (FAFSA).

## **Public Notice Requirements**

Posters, brochures, and other awareness materials explaining educational rights, programs, and other related services for those families experiencing homelessness are required to be posted in the registration area of all schools and other locations where low-income and high-risk families receive services.

## **Eligibility for Free School Meals**

The Richard B. Russell National School Lunch Act establishes that certain homeless, runaway, and migrant children are categorically eligible for free meal benefits under the National School Lunch and School Breakfast Programs. These students and families do not have to complete an application for free meals. Rather, USDA policies allow for automatic enrollment of these students, which is known as “direct certification,” to ensure they receive meals quickly. More information, including related USDA memos, is available at <http://fna.usda.gov/cnd> or [http://center.serve.org/nche/legis/cn\\_wic.php](http://center.serve.org/nche/legis/cn_wic.php).

## **Data Collection Requirements**

The U.S. Department of Education (ED) requires all LEAs, with and without subgrants, to submit information to determine the extent to which homeless children and youth have access to a free, appropriate, public education under Title IX, Part A of ESSA. All data reported must be based on actual student enrollment in PowerSchool.

To assure that the data is correct in the ALSDE AIMS Portal, student information needs to be entered into PowerSchool at the time of enrollment or when a currently enrolled child becomes identified as homeless.



LEAs must also identify the primary nighttime residence for each homeless student identified and enrolled. The primary nighttime residence indicates the type of temporary resident in which the student resides.

Shelter/transitional housing

Doubled-up (due to economic hardship)

Unsheltered (parks, cars, abandoned housing)

Hotel/Motel

## **Policy Review and Revision**

Annually, LEAs must review and revise any laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, and success in school of homeless children and youth. In the review of such laws, regulations, practices, or policies, LEAs should give specific consideration to the laws regarding the following areas:

- Identification
- School Selection
- Enrollment
- Transportation
- Services
- Resolution of Disputes
- Free Meals
- Title I
- Training
- Coordination
- Preschool
- Appropriate Credit for Full or Partial Coursework Satisfactorily Completed

## **McKinney-Vento State Advisory Committee**

A state-level advisory committee was established to assist with developing an action plan for state-level activities. Starting in 2017, and each year thereafter, the state homeless coordinator will facilitate the work of the advisory committee. Committee members will serve two academic school terms. Committee members will consist of representatives from local education agencies, state agencies, and community organizations. The advisory committee will meet at a minimum of once yearly. Meetings will take place at the Alabama State Department of Education in Montgomery.

- Committee duties include, but are not limited to:
  - discussing changes to the McKinney-Vento competitive grant request for application (RFA) and scoring rubric
  - sharing important information as it relates to the McKinney-Vento Homeless Education Assistance Act
  - developing and/or revising policies and procedures as it relates to homeless education
  - utilizing data and LEA homeless needs assessments to direct the committee's annual work

Results from the committee work for the action plan will be shared with Federal Programs Coordinators at the Federal Programs Annual Fall Conference and/or The Alabama Association of Federal Education Programs Administrators (AAFEPA). Homeless Liaisons and Coordinators will have access to the action plan through the ALSDE website.

### **Local Educational Agency (LEA) Homeless Survey**

LEAs must conduct an annual survey to identify the number, location, and educational and related support needs of homeless children and youth residing in the jurisdiction of the LEA. The LEA must use the definitions of homeless children and youth as identified in the McKinney-Vento Homeless Assistance Act when identifying and determining the needs of these children. The most effective way to identify the needs of homeless children and youth is through coordination with local supports, such as the migrant coordinator, student support services, bus drivers, and school staff, including social workers, counselors, attendance officers, principals, teachers, enrollment clerks, etc.

### **Competitive Grant Application for McKinney-Vento Education for Homeless Children and Youth Grants**

The purpose of the Education for Homeless Children and Youth Program is to ensure that each child of a homeless individual and each homeless youth have equal access to the same free and appropriate public education that is provided to other children and youth.

Applications must be received by **the deadline date**, to be considered for funding. There will be no exceptions to this submission requirement since this is a **competitive** application process. Applications will be submitted electronically through eGAP and must be **Superintendent Approved** in eGAP in order to be read by the reviewers.

#### ➤ **Eligible Applicants**

As federal funds become available, the Alabama State Department of Education (ALSDE) will make subgrants to local education agencies (LEAs) serving homeless children and youth.

#### ➤ **Technical Assistance for Applicants**

Technical assistance is provided to LEAs via a PowerPoint which can be found on the ALSDE website under the Federal Programs section tab at [www.alsde.edu](http://www.alsde.edu). It can also be found in the eGAP Document Library.

**Special Note:** Awards are made annually based on competition results. All funds should be budgeted and expended during the year of the award (no carryover).

#### ➤ **Selection Process and Criteria**

✓ Criteria for selection based on “need” will include the following:

- The extent to which the proposed use of funds will facilitate the enrollment, retention, and educational success of homeless children and youth.
- The extent to which the application reflects coordination with other local and state agencies that serve homeless children and youth and describes how the applicant will meet the requirements of Section 9102(g)(3).

- The extent to which the applicant demonstrates in the application and in current practice a commitment to education for all homeless children and youth.
- ✓ Criteria for selection based on “quality of the application” will consider the following:
  - The applicant’s needs assessment and the likelihood that the program presented in the application will meet such needs.
  - The types, intensity, and coordination of the services to be provided under the program.
  - The involvement of parents or guardians of homeless children or youth in the education of their children.
  - The extent to which homeless children and youth will be integrated within the regular education program.
  - The quality of the applicant's evaluation plan for the program.
  - The extent to which services provided will be coordinated with other services available to homeless children and youth and their families, i.e., – collaboration with other local agencies.
  - Such other measures as the ALSDE considers indicative of a high-quality program (i.e., – has the application been submitted to the State Coordinator expeditiously), such as the extent to which the LEA will provide case management or related services to unaccompanied youth.

After all proposals have been read and scored by the review panel, the proposals will be ranked from highest to lowest according to their scores. In addition, each reviewer will indicate on his/her Technical Review Form if funding of the proposal is recommended.

If the majority of the reviewers do not recommend approval, a proposal will not be considered in the approval process. However, if the majority of the reviewers recommend approval, the proposal will be considered for approval based on its rank.

The Federal Programs Section will make recommendations for awards to the State Superintendent of Education. The final decision to award a subgrant rests solely with the ALSDE.

### **Additional McKinney-Vento Resources**

<https://nche.ed.gov/resources/>

<https://www.schoolhouseconnection.org/>

<https://www2.ed.gov/programs/homeless/guidance.pdf>

# Charter Schools

Federal Program requirements are complex and require an orientation, as well as on-going Technical Assistance. Please contact your assigned ALSDE regional support specialist at (334) 694-4516 to schedule Technical Assistance. It is recommended that schools contact their assigned specialist in April of the year prior to the school's initial opening.

Charter Schools are required to designate a Homeless Liaison and follow all policies and procedures of the McKinney-Vento Homeless Assistance Act. To learn more about homeless education and the school's responsibilities as it relates to McKinney-Vento, please contact the Federal Programs Office at (334) 694-4516.

# Equitable Services for Private Schools

## General Information

Since the initial passage of the Elementary and Secondary Education Act of 1965 (ESEA), private school students and teachers have been eligible to participate in the Title I, Part A (Title I) program. The reauthorization of the ESEA by the Every Student Succeeds Act (ESSA) continues the requirement that a local educational agency (LEA) that receives Title I funds provide equitable services to eligible private school students, their teachers, and their families. This guidance is intended to be used in conjunction with the Title I statute and applicable regulations by both public and private school officials.

An LEA shall (a) after timely and meaningful consultation with appropriate private school officials, provide eligible children and/or staff, on an equitable basis, applicable services such as: instructional services, counseling, mentoring, one-on-one tutoring, professional development opportunities, etc., that address their needs; and for Title I, Part A targeted-assistance programs (b) ensure that teachers and families of the children participate on an equitable basis (pursuant to ESSA, Section 1116).

## Eligible Programs

Title I, Part A, Section 1117: (Equitable Services to Private Schools)

Title I, Part C: (Migrant Education)

Title II, Part A: (Teacher and Principal Training and Recruiting)

Title III, Part A: (English Learners)

Title IV, Part A: (Student Support and Academic Enrichment)

Title IV, Part B: (21st Century Community Learning Centers)

## Overview of Selected Equitable Services Program Requirements

- LEA must keep annual documentation on file which meet all requirements of the ESSA, Sections 1117 and 8501
- LEA is required to provide equitable services for eligible private school students and staff
- Equitable Services must be secular, neutral, and non-ideological for all educational services, materials, professional development opportunities, and equipment
- Equitable Services must be provided in a timely manner
- LEA must document timely and meaningful ongoing consultation meetings
- LEA and private school officials shall both have the goal of reaching agreement on how to provide equitable and effective programs for eligible private students meeting the consultation requirements of Sections 1117 and 8501
- LEA must submit signed Affirmation of Consultation forms for each participating private school

- LEA is the fiscal agent and must maintain control of all federally funded purchases for materials, property, and equipment
- LEA must hire and oversee all staff providing instructional services to private school students
- LEA funds for private school educational services shall be obligated within the same fiscal year received
- Carryover of unobligated funds for private school services may only be Alabama State Department of Education (ALSDE) approved for extenuating circumstances
- LEA shall provide to private school officials a written explanation for disagreements
- LEA must ensure all private school program services meet the needs (according to data) of the students/staff and are reasonable, necessary, allowable, allocable, and meet all Education Department General Administrative Regulation (EDGAR) requirements
- Private school officials shall have the right to file a formal complaint with the ALSDE if the LEA did not provide due consideration to private school official views or did not make decision(s) that treat private school/students equitably (after documented attempts to collaborate and reach an agreement with the LEA are not successful)
- Equitable services are monitored and enforced by the ALSDE

## The Consultation Process

Consultation must be both timely and meaningful to ensure the equitable participation of private school students, teachers, and parents. It must occur before the district or other entity makes any decisions that affect the ability of private school students, teachers, and their families to equitably participate in the benefits of the program. Consultation begins early enough for the entire process of program design and development to be completed, for exploring the option of third-party providers, and for services to begin by the start of the school year.

Timely consultation requires that the public school district provide advance notice of consultation meetings to private school officials. Meaningful consultation covers all required topics and affords private school officials a genuine opportunity to express their views. Effective consultation is ongoing, two-way communication and discussion of the best ways to meet the needs of private school students and teachers under the provisions of the particular program. Consultation is significantly enhanced when public school officials provide information about the amount of funds available for services, in advance of any consultation meeting, in order for private school officials to have the opportunity to adequately prepare for discussions.

## “Intent to Participate” Form

An “Intent to Participate” form is a document that LEAs send annually to private school officials to determine their interest in participating in Title I equitable services. The form might include a brief description of the programs for which equitable services are available as well as a list of allowable activities, services, and benefits. Some LEAs send this form by registered mail in order to document receipt of the form by private school officials. An LEA might also send such form by email with read receipt.

An LEA may set a reasonable deadline, taking into consideration private school schedules, for private school officials to indicate their intent to participate. An LEA should provide clear and enough notice of the deadline, identify potential consequences for not meeting the deadline, and give adequate time for private school officials to respond.

### **Determining Which Private Schools to Contact**

An LEA has a responsibility to contact all private schools within the district that might have students eligible to participate in Title I programs—i.e., students who live in a participating Title I public school attendance area in the LEA. An LEA also has a responsibility to contact private schools outside the district if the LEA has reason to believe students who reside in a participating Title I public school attendance area attend those schools. An LEA may not be aware, however, of every instance in which a student who resides in a participating Title I public school attendance area attends a private school outside of the district. Thus, if a private school has students, it believes may be eligible for Title I services because they reside in a participating Title I public school attendance area in another LEA and the private school has not been contacted by that LEA, it would be prudent for private school officials to contact the LEA directly in order to ensure that their eligible students are considered for Title I services.

### **Documentation to Support That Meaningful Consultation Has Occurred**

It is also good practice for an LEA and appropriate private school officials to maintain a record of notes about topics addressed and decisions made during consultation meetings. Retaining meeting agendas and sign-in sheets is also good practice. In order to verify that it has met the requirement for timely and meaningful consultation and has provided equitable services, as a best practice, an LEA may want to document that it has:

- Annually informed the private school officials of the opportunity to participate in the Title I program and the various services available;
- Engaged in timely consultation, allowing for meaningful discussion between the LEA and appropriate private school officials regarding services and other benefits;
- Identified the needs of private school students, teachers, and families;
- Allocated a per-pupil amount of funds for services to private school students, teachers, and families that is calculated from the proportional share in accordance with ESEA section 1117(a)(4)(A);
- Provided services, programs, materials, and resources;
- Evaluated programs and services for effectiveness; and
- Adequately addressed problems and formal complaints raised by private school officials.

## Allocating Funds for Equitable Services

An LEA would determine the proportionate share of funds available for equitable services as follows:

1. Based on prior year's data, determine the total number of children from low-income families residing in each participating public school attendance area who attend public and private school
2. Determine the overall proportion of these children who attend private schools
3. Apply this proportion to the current year's allocation to determine the amount of funds available for equitable services.

In addition, LEAs must reserve at least 1% of its Title I allocation for parent & family engagement activities if the LEA's entitlement exceeds \$500,000. LEAs must calculate the proportionate share of the 1% of the Title I allocation.

## Transferability

Under the ESEA, LEAs may transfer funds they receive by formula under certain programs to other programs to better address local needs. Before a transfer of funds from a program subject to equitable services requirements, timely and meaningful consultation must occur between the LEA and private school officials. The purpose of the meeting is to describe federal programs impacted by the transfer and to determine the intent of private school's participation in programs receiving transferred funds.

## Complaints

Pursuant to §1117 and 8501 of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESSA), a private school official has the right to file a written complaint with the ALSDE Ombudsman asserting that a school district did not engage in consultation that was meaningful and timely, did not give due consideration to the views of the private school, or did not make a decision that treats private school students equitably.

Private school officials filing a complaint with the Ombudsman concerning equitable services under ESSA must do so in writing and utilize the ALSDE form that requires the following information:

- full name, address, email address, and telephone number of individual(s) or organization(s) filing the complaint;
- description of the situation or allegation including whether or not the school district engaged in consultation that was meaningful and timely, gave due consideration to the views of the private school officials, or made decisions that treated private school students equitably;
- name of the school district the complaint is being filed against and names of any other agencies or employees involved;
- statement identifying which title requiring equitable services has been allegedly violated;
- all facts supporting the allegation; and
- efforts made to resolve the complaint with the school district.



Complaints, which must be signed by the individual(s) or organization(s) filing the complaint and copied to the school district, must be mailed to the ALSDE Ombudsman at the following address:

Alabama State Department of Education  
Ombudsman for Equitable Services  
P.O. Box 302101  
Montgomery, AL 36130

Once the Ombudsman receives the complaint, he/she will respond to the complaint in writing within forty-five (45) calendar days. The Ombudsman's response will include his/her decision and information about filing an appeal, if necessary.

In the event the complainant is dissatisfied with the decision of the Ombudsman, the complainant may appeal directly to the Secretary of Education at the US Department of Education within 30 days of the decision of the Ombudsman. The Secretary investigates and resolves the appeal no later than 90 days after receipt of the appeal.

### **Evaluating the Effectiveness of Services**

LEA officials must assess annually the progress of the Title I program toward enabling private school participants to meet the agreed-upon standards. Student performance results will be reviewed annually. When the standardized test information is available, the Title I teacher(s) and the private school official(s) will meet to analyze the assessment results for the participating students. Their goal is to determine whether the level of student performance, as measured by the standardized test, has met or exceeded the desired outcomes agreed to in consultation.

Based on consultation, the effectiveness of the Title I program at each private school will be measured through comparing the targeted percentage of students reaching the established performance-level standard and the agreed-upon year-end percentage of students achieving the performance level.

In the event the Title I program fails to meet the annual progress target, consultation will occur to examine the student performance data to determine whether modifications are required.