Just Where Are We With ESEA Title Programs?

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Division of Student Support
May 11, 2017

Session Topics

• Federal and State Pieces
• Timelines
• Questions
• Some Other Thoughts

The Elementary and Secondary Education Act (ESEA)
No Child Left Behind (NCLB) reauthorized Every Student Succeeds Act (ESSA)

http://education.state.mn.us/MDE/dse/ESSA/index.htm
ESEA/ESSA Title Programs

**Title IA** – Assist students most in need of additional help to achieve the challenging State academic standards — Census

*Title I, Part C* – Ensure that all migrant students ages 3-21 achieve the challenging State academic standards and graduate

*Title I, Part D* – Assist neglected and delinquent students to achieve the challenging State academic standards — Delinquent Student Count*

**Title IIA** – Increase Professional Development opportunities for teachers, principals and other school leaders — Student count ages 5-17 and % poverty calculations*

**Title IIIA** – Provide supplementary assistance for English Learners to achieve the challenging State academic standards — EL student count ages 5-17* ([*Prior year October Count]*)

Minnesota Title I Allocations

- FFY 2009 – 140.233 million
- FFY 2010 – 130.061 million
- FFY 2011 – 158.514 million
- FFY 2012 – 157.516 million
- FFY 2013 – 142.758 million
- FFY 2014 – 141.408 million
- FFY 2015 – 148.795 million
- FFY 2016 - 153.712 million*
- FFY 2017 - ?
TITLE I PROGRAMS

Targeted Assistance Program
- Services only to students identified as most in need of academic assistance
- Supports Title I funded staff
- Supplements the core instruction funded with state and local resources

Schoolwide Program
- At least 40 percent of the school's enrollment is eligible for free or reduced-price lunch. (Implementation of Schoolwide waiver beginning in 2018-2019)
- Funds are used to upgrade the entire educational program in order to raise the achievement of the lowest-achieving students.
- Support is available to all students including but not limited to lowest achieving and historically underserved
- Strategies to improve the entire school are identified in the Title I Schoolwide plan

SCHOOL SELECTION
- SERVS rank orders all schools according to poverty percent.
- Must serve schools over 75% poverty.
- Schools with higher poverty must have a per pupil allocation of at least as much as one with lower poverty.

EXCEPTIONS:
- LEA enrollment less than 1000 not required to rank order schools
- Rank order by grade span
- 35% rule allows LEA to serve all schools with more than 35% poverty
- 125% rule requires LEA to allocate a PPEF equal to 125 percent of the LEA's allocation per low-income child
Minnesota Title II Allocations

- FFY 2009 – 38.884 million
- FFY 2010 – 38.554 million
- FFY 2011 – 33.104 million
- FFY 2012 – 33.021 million
- FFY 2013 – 31.352 million
- FFY 2014 – 31.301 million
- FFY 2015 – 30.415 million
- FFY 2016 - 29.870 million?
- FFY 2017 - ?

Title II, Part A

The Title II, Part A program is
- designed to increase student achievement;
- 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 at improving student academic achievement;
- and provide students from low-income families and minority students greater access to effective teachers, principals, and other school leaders. (ESEA section 2001).

Title II, Part A investments should align with an SEA’s or LEA’s overall strategies as identified in the World’s Best Workforce Plan to support effective instruction in order to improve student academic outcomes.

In addition to using Title II funds for professional development, funds can also be used for a variety of other purposes, from recruiting and retaining teachers to reducing class sizes.

1. TRANSFER - "Transferability" is to transfer a portion of an allocation to another Title program to more effectively address the needs of another Federal program. Funds can be transferred from Title II (FIN 414) to Title I (FIN 401) and to Title III (FIN 417) will appear on the Title I reconciliation report and be excluded on the Title II reconciliation report. Actual funds are moved from one program into another in the Manage Allocations/Competitive Awards tab. Transferred funds are subject to the rules and requirements of the Title program to which the funds are transferred.

2. REAP FLEX – Districts eligible for a Rlus or SRESA grant are allowed to REAP FLEX their Title II dollars into Title I. The dollars remain in the Title II grant but are spent on Title I budget initiatives. All Title I expenditures are not allowable Title II expenditures. Districts choosing to utilize object codes NOT ALLOWED in Title II should transfer those funds to FIN 401 in SERVS Financial. The other object codes for REAP FLEX funds can be built on the General Tab in the Title II (FIN 414) application.

3. CLASS SIZE REDUCTION - Districts whose identified professional development needs are being met through access to other District funds can consider using their Title II funds to support class size reduction. As with other interventions, you will want to consider the evidence that supports this intervention.
Minnesota Title III Allocations

- FFY 2009 – 7.922 million
- FFY 2010 – 8.744 million
- FFY 2011 – 8.344 million
- FFY 2012 – 8.589 million
- FFY 2013 – 8.067 million
- FFY 2014 – 8.531 million
- FFY 2015 – 8.728 million
- FFY 2016 – 8.911 million
- FFY 2017 - ?

State Funds – One student will generate state funds.

Federal Funds
Supplements core program
Professional Development
Language Instruction Educational Program

- Generate $10,000 or more to receive an individual district award
- Generate less than $10,000 – option to form/join a Consortium
  Three year commitment

Intended Purpose of Title III Funds

1. Ensure that English Learners attain English proficiency and develop high levels of academic achievement.
2. Achieve at high levels of academic subjects and meet challenging state academic standards.
3. Assist teachers, principals, school leaders in establishing, implementing and sustaining effective language instruction educational programs.
4. Assist teachers, principals, school leaders and others with professional development.
5. Provide parent, family and community engagement
Title IV, Part A – Student Support and Academic Enrichment Grants

Purpose of the SBAE Grants

Intended to improve student academic achievement by increasing the capacity of State educational agencies (SEAs), local educational agencies (LEAs), and local communities to:

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

Funding Allocations

- Based on the results of the comprehensive needs assessment, the LEA or a consortium of LEAs must use:
  - At least 25 percent of funds for activities to support well-rounded educational opportunities,
  - At least 75 percent of funds for activities to support safe and healthy students, or
  - A portion of funds for activities to support effective use of technology.

Federal Award Cycle

Federal Title Awards

Awards are forward funded, intended for the year awarded.

- first 25% available on July 1st
- Remaining 75% available on October 1st

Awards are granted for up to 27 months. (Title I 15% limitation)
Supplement not supplant

ESEA Section 1118(b)(2) Compliance

“A local educational agency shall demonstrate that the methodology used to allocate State and local funds to each school receiving assistance under Title I, Part A ensures that such school receives all of the State and local funds it would otherwise receive if it were not receiving assistance under Title I, Part A.”

Use of Federal Funds - Criteria

Costs must be legal under federal, state & local law!

Reasonable and Necessary
A cost is reasonable and necessary if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

Allocable
A cost is allocable to a cost objective if the goods or services involved are chargeable or assignable to the cost objective in accordance with the relative benefits received.

Allowable
A cost is allowable if it is necessary and reasonable for proper and efficient performance of the award and allocable to the award.

Consistent with cost principals contained within Uniform Guidance
Documented need (from CNA)
Support For Charges

To Federal Funds

<table>
<thead>
<tr>
<th>Activity</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title III - Intent to form a new Consortium</td>
<td>May 15, 2017</td>
</tr>
<tr>
<td>Title I 15% Limitation Waiver (If needed; districts are eligible once in a 5 year period)</td>
<td>June 30, 2017</td>
</tr>
<tr>
<td>Accept/Decline Funds (Manage Allocations/Competitive Awards Tab)</td>
<td>June 30, 2017</td>
</tr>
<tr>
<td>Initiate and Fully Activate Application (Save something new)</td>
<td>June 30, 2017</td>
</tr>
<tr>
<td>Complete Applications</td>
<td>June 30, 2017</td>
</tr>
<tr>
<td>Applications Submitted for Approval</td>
<td>September 1, 2017</td>
</tr>
<tr>
<td>Approval Process: Applications Reviewed, Revised, Approved/Not Funded and Archive Status</td>
<td>September 1 – November 2017</td>
</tr>
<tr>
<td>Unaudited 2016-2017 UFARS Data – Application Closeout</td>
<td>September 15, 2017</td>
</tr>
<tr>
<td>Audited 2016-2017 UFARS Data – Application Closeout</td>
<td>November 30, 2017</td>
</tr>
<tr>
<td>Audit Trail 2016-2017 UFARS Data</td>
<td>December 1, 2017</td>
</tr>
<tr>
<td>Intent to Become a new Schoolwide in 2018-2019</td>
<td>November 1, 2017</td>
</tr>
<tr>
<td>Comparability Report</td>
<td>November 30, 2017</td>
</tr>
<tr>
<td>Amendment Window One (Revise application)</td>
<td>March/April 2018</td>
</tr>
<tr>
<td>Amendment Window Two (Spending has ended)</td>
<td>June/July/August 2018</td>
</tr>
<tr>
<td>Unaudited 2017-2018 UFARS Data</td>
<td>September 15, 2018</td>
</tr>
<tr>
<td>Audited 2017-2018 UFARS Data</td>
<td>November 30, 2018</td>
</tr>
</tbody>
</table>

Moving Forward ...

- MDE and Federal websites
- Superintendent’s Mail
- Title Programs Listserv
- SERVS Message Board
- Technical Assistance Guide
- Monitoring Tool
- WebEx sessions and modules
- Area Director
- Email and/or phone contact
Managing Applications and Budgets

Amendment Window One – (March 1/April 30)

- For All Title Programs
  - Adjust/revise narrative/budget
  - Last opportunity to add an object code
  - Revise budget up to 10% cumulative change without triggering an amendment
  - Narrative changes require MDE approval
  - Revisit district contact information (Check accuracy & include phone extensions)
  - Set Stage for Amendment Window Two and next application cycle.

Note the Funds Available, Funds Budgeted (Working Total, Approved Total) and the Amount Expended.
Amendment Process

Add the amendment description to the existing description. (Do not delete the existing application description.)

In addition, an amendment description statement summarizing the changes being made needs to be entered in the narrative description (1.1.1) on the general tab.

Setting the Stage for Amendment Window Two

Amendment Window Two (June/July/August)
- Revise up to 10% cumulative change without triggering an amendment
- No narrative change
- Revise budget to actuals
- Revisit district contact information (accuracy & phone extensions)
- Ready to balance forward into next application cycle unbudgeted/unspent funds
- Ready application for closeout.
- Determine need for a 15% Waiver based on actual spending
- New allocation (25% forward funded – July 1st and remaining 75% becomes available on October 1st)

Revise to Actuals sets the stage for application closeout.
Funds Available, Funds Budgeted (working total and approved total) and Amount Expended all match.

education.state.mn.us
## CLOSEOUT 2016-2017

<table>
<thead>
<tr>
<th>Activity</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amendment Window Two</td>
<td>June/July/August 2017</td>
</tr>
<tr>
<td>Review your SERVS/UFARS report by object code to note any positive or negative discrepancies.</td>
<td></td>
</tr>
<tr>
<td>Unaudited 2016-17 UFARS Data</td>
<td>September 15, 2017</td>
</tr>
<tr>
<td>Review the SERVS/UFARS report totals (SERVS budget and reported UFARS budget) for any discrepancies to eliminate any repayment requirements.</td>
<td></td>
</tr>
<tr>
<td>Audited 2016-2017 UFARS Data</td>
<td>November 30, 2017</td>
</tr>
<tr>
<td>• Revise either budget as allowed or as is necessary.</td>
<td></td>
</tr>
</tbody>
</table>

### Carryover (Balance Forward)

Title I Carryover (Balance Forward)
- is limited to 15% of the current year allocation plus transfers.
- Calculated (using the expended total) with the change in federal fiscal year (FFY) on September 30 – October 1st.
- Districts may request a waiver from the carryover limitation – once in a three year period.

Title II & III carryover could be up to 100%.

### KEEP IN MIND

The Continuing Resolution passed in December of 2016 that provides federal funding through April 28, 2017 (at the current federal year 2016-2017 levels).

**Note:** Final 2016-2017 awards cannot be calculated until the federal budget is finalized for the full federal fiscal year. (Currently, April 29, 2017 through September 30, 2017 is not funded.)

MDE recommends that districts reduce current year spending by 1-5%. Districts should consider this information during Amendment Window One and make the appropriate adjustments. As we approach Amendment Window Two and application closeout... we anticipate knowing final 2016-2017 information.

In the absence of a full federal fiscal year’s funding, preliminary awards (2017-2018) cannot be calculated.

For planning purposes MDE recommends that districts use a conservative approach and plan for further reduction in funds for 2017-2018. With the new ESSA funding formulas and additional set aside requirements, MDE anticipates that Minnesota’s overall funding will decrease, potentially in the 10% range. Note that this is only an estimate at this time.

Note that this is only an estimate at this time.
SERVS Payment Process

- Title funds are drawn down on a reimbursement basis.
- Transactions that are entered into SERVS before the "scoop-up" on Tuesdays, are processed into a batch.
- The batch is transmitted to the state accounting system (SWIFT).
- SWIFT usually processes their batches on Wednesday.
- ACH instructions sent to the system on Thursday.
- ACH transactions are processed and funds should be in district accounts on Friday.
- When viewing the Register ... pending, posted, cleared are key terms. Check the register to track progress of draws.
- Some draws may be delayed if there are SWIFT budget or other issues which may delay payments by one or more days.
- NOTE: Draws will not process if the application is not in the Funded and Active status.

Some Newer UFARS Codes

<table>
<thead>
<tr>
<th>Object Code</th>
<th>Consulting Fees/Fees for Services</th>
<th>Repairs and Maintenance for Computers and Technology</th>
<th>Data Processing and Data Entry Services</th>
<th>Computer and Technology Services (Other Technology Services)</th>
<th>Non-Instructional Software Licensing &lt; $5,000</th>
<th>Instructional Software Licensing &lt; $5,000</th>
<th>Capitalized Non-Instructional Technology Software &gt; $5,000</th>
<th>Capitalized Instructional Technology Software &gt; $5,000</th>
<th>Non-Instructional Technology Supplies &lt; $5,000</th>
<th>Instructional Technology Supplies &lt; $5,000</th>
<th>Capitalized Non-Instructional Technology Hardware &gt; $5,000</th>
<th>Capitalized Instructional Technology Hardware &gt; $5,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>326/204</td>
<td></td>
<td></td>
<td>318</td>
<td></td>
<td>405</td>
<td>406</td>
<td>505</td>
<td>506</td>
<td>455</td>
<td>456</td>
<td>555</td>
<td>556</td>
</tr>
</tbody>
</table>

Consult the 2017 UFARS Manual for additional information and clarification.

UFARS Reporting - Title I Course Codes

<table>
<thead>
<tr>
<th>Course Code</th>
<th>Current Year</th>
<th>Prior Year</th>
<th>Second Prior Year</th>
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</thead>
<tbody>
<tr>
<td>Highly Qualified</td>
<td>634</td>
<td>627</td>
<td>621</td>
</tr>
<tr>
<td>LEA Activities</td>
<td>635</td>
<td>628</td>
<td>622</td>
</tr>
<tr>
<td>Neglected &amp; Delinquent</td>
<td>635</td>
<td>629</td>
<td>623</td>
</tr>
<tr>
<td>Homeless</td>
<td>637</td>
<td>630</td>
<td>624</td>
</tr>
<tr>
<td>Parent Involvement</td>
<td>638</td>
<td>631</td>
<td>625</td>
</tr>
<tr>
<td>School Choice &amp; SES</td>
<td>639</td>
<td>632</td>
<td>626</td>
</tr>
<tr>
<td>Professional Development</td>
<td>640</td>
<td>641</td>
<td>642</td>
</tr>
<tr>
<td>Waiver School Improvement</td>
<td>667</td>
<td>668</td>
<td>669</td>
</tr>
</tbody>
</table>

These Course codes are used in UFARS reporting only. (Not with SERVS draws.) Course codes will be revised for 2018-2019 when all ESSA requirements have been implemented.
UFARS Reporting – Transfer

<table>
<thead>
<tr>
<th>Fund Number</th>
<th>Organizational Number</th>
<th>Program Number</th>
<th>Finance Code</th>
<th>Object Code</th>
<th>Course Code</th>
<th>Total Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>005</td>
<td>216</td>
<td>401</td>
<td>161</td>
<td>000</td>
<td>10,000.00</td>
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<tr>
<td>01</td>
<td>005</td>
<td>216</td>
<td>414</td>
<td>161</td>
<td>000</td>
<td>5,556.78</td>
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<tr>
<td>01</td>
<td>005</td>
<td>204</td>
<td>414</td>
<td>366</td>
<td>000</td>
<td>628.67</td>
</tr>
</tbody>
</table>

Transfer to Title I – Program 216 FIN414
Reap Flex to Title II – Program 204 FIN414

UFARS Reporting

Audited UFARS Data Entry Due Date: November 30

REAP FLEX ERROR
SERVS Repayment Process

Send email request requesting repayment for (school year) (FIN Code) in the amount of ($) as noted below. Required information:

- District Name:
- District Number:
- Finance Code:
- Course Code:
- Year of Transaction:
- Date of Draw: Draw Amount:
- Amount of Overpayment:
- Rational: Overpayment—
- Attached is a screenshot of draw from SERVS. A future aid payment to the District will be reduced by that amount.

Nonpublic Equitable Share

The equitable share for the nonpublic Title programs is off the top of the district’s Title allocations.

- **Preliminary Equitable Share**: MDE will post (prior to consultation)

- **Title I Actual**: During consultation with the nonpublic school official, identify the nonpublic students from low income families that live within the boundaries of a public Title I school and are within the grade span of that Title I school to determine the equitable share.

Nonpublic: Title I Preliminary Nonpublic Equitable Share
Nonpublic Equitable Share

The equitable share for the nonpublic Title I program could include:

- Direct services to students during the school day
- Parent and family engagement requirements*
  - Conference/compact
  - Parent/family engagement activities that support the student’s academic success
- Summer School
- Professional Development
- Preschool Program
- After School Activities
- Administrative

*required

Title II and III Nonpublic Equitable Share

How to determine the equitable share for nonpublic school Title Programs:

• Title allocation
• Divided by the total number of participating public and private schools’ student population (identified in the Nonpublic Fall Report)
• Equals the per pupil funding unit (PPFU)

* There is no Hold Harmless in Title II.
* Administrative, can be taken off the top.

SCHOOL IMPROVEMENT

MDE will define the School Improvement requirements 2017-2018 soon. Based on that …..

• Schools with current designations of Priority, Focus and (Continuous Improvement) will retain designations for 2017-2018
• 20% School Improvement set-aside will be required in SERVS application
• Set-aside activities supported with Title I funds must be earmarked in school’s improvement plan
• Designated schools will continue to access services of the Regional Centers of Excellence
• Schools will not be required to upload Record of Continuous Improvement but if a Schoolwide, will upload the LEA Schoolwide Confirmation
SCHOOL IMPROVEMENT
Uploads and 20% Set-aside

The 20% school set-aside for Priority, Focus and Continuous Improvement schools is built on the improvement tab. Continuous Improvement for Continuous Improvement schools and School Improvement Impasse statute for Priority and Focus schools.

Improvement drop-downs remain the same for 2017-2018 and will be updated for 2018-2019 when the new accountability system is put into place if required at that time.

SCHOOL IMPROVEMENT
2018-2019
• New accountability system is being developed
  • Comprehensive Support and Improvement Schools
    • Lowest 5% of all Title I schools or
    • Any public high school graduating less than 67% of eligible students
    • Not identified until 2021-2022 (second round of identifications)
  • Targeted Support and Improvement
    • Any public school with low-performing student groups
    • Identified once every three years beginning with 2018-2019

Required Written Procedures
for documenting work activity and allocating personnel costs

Provide instructions for the completion, verification, review and reconciliation of work activity records, payroll records and charges to funding sources including federal funds.

To assure accuracy, the frequency for reporting work activity may differ for employees whose work is
a. eligible to be paid entirely with one federal cost objective,
b. divided among multiple cost objectives with a fixed schedule,
c. divided among multiple cost objectives without a fixed schedule.
**Procurement and Competition Requirements**


Maintain records to detail history of the purchase such as the procurement method and selection of contractor/vendor.

Have written procurement procedures requiring open competition, authorization before obligating funds, and other internal controls.

**Comparability**

Requires school districts to provide services in Title I schools from state and local funds that are at least comparable to services in non-Title I schools.

Title I funding is intended to provide additional resources to Title I schools.

Annual certification on file at MDE. Due date of November 30th.

**Maintenance of Effort (MOE)**

An LEA may receive funds under a covered program for any fiscal year only if the SEA finds that either —

- the combined fiscal effort per student; or
- the aggregate expenditures of state and local funds with respect to the provision of free public education by the LEA for the preceding fiscal year was not less than 90 percent of the combined fiscal effort per student or aggregate expenditures for the second preceding fiscal year. (ESEA section 1118(a) and 8521(a).) If an LEA fails to maintain effort by failing below 90 percent of both the combined fiscal effort per student and aggregate expenditures (using the measure most favorable to the LEA), the SEA must reduce the LEA's allocation under a covered program in the exact proportion by which the LEA failed to maintain effort. (ESEA section 8521(b).)

ED may waive the maintenance of effort requirement for an LEA if it determines that a waiver would be equitable due to —

- exceptional or uncontrollable circumstances; or
- a precipitous decline in the financial resources of the LEA.

(ESEA section 8521(c).)
**Maintenance of Effort (MOE)**

**Updated Programs to which the Maintenance of Effort Requirement Applies**

- Title I, Part A – improving basic programs operated by LEAs
- Title I, Part D – prevention and intervention programs for children and youth who are neglected, delinquent, or at-risk
- Title II, Part A – supporting effective instruction
- Title III, Part A – English language acquisition, language enhancement, and academic achievement
- Title IV, Part B – 21st Century Community Learning Centers
- Title V, Part B, Subpart 2 – Rural and low-income school program
- Title VI, Part A, Subpart 1 – Indian education

(ESEA sections 8101(11), 8118(c), 8521(a).)

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**EDRS Licensure Verification**

- 2016-2017
  - Closeout
  - Final staff and expenditures
  - Errors require submission of Licensure Override Request

- MOVING FORWARD
  - Districts/Charters will not be required to verify licensure requirements in EDRS.

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**EDRS Title Programs License Verification 2016-2017**

<table>
<thead>
<tr>
<th>Description of Licenses</th>
<th>Title Staff Expenditures Reported by Object Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Teachers</td>
<td>140</td>
</tr>
<tr>
<td>Licensed Support</td>
<td>143</td>
</tr>
<tr>
<td>Paraprofessionals</td>
<td>161</td>
</tr>
<tr>
<td>Nonlicensed Support</td>
<td>144</td>
</tr>
<tr>
<td>Associated Fringe Benefits</td>
<td>200's</td>
</tr>
<tr>
<td>Contracted Services</td>
<td>303 (1st $25,000)</td>
</tr>
<tr>
<td>Contracted Services (Teachers Only)</td>
<td>304 (amount over $25,000)</td>
</tr>
</tbody>
</table>

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