

COORDINATED SPENDING GUIDE

BRAIDING AND BLENDING FUNDS

COMPREHENSIVE STRATEGIES TO SUPPORT ACTIVITIES THAT
DRIVE PERFORMANCE AND IMPROVE OUTCOMES FOR TENNESSEE STUDENTS

OFFICE OF CONSOLIDATED PLANNING & MONITORING



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INTRODUCTION

The purpose of this manual is to help local educational agency (LEA) leaders make the most out of the more than \$700 million Tennessee receives each year from the U.S. Department of Education (ED) under the Elementary and Secondary Education Act of 1965 (ESEA), the Individuals with Disabilities Education Act (IDEA), and the Carl D. Perkins Career and Technical Education Act (CTE). This money is distributed through individual federal grant programs to the state educational agency (SEA) which subgrants funds to LEAs. LEAs should leverage these funds by coordinating grant spending to support activities that drive performance and improve outcomes for all students.

Coordinated spending requires a shift in mindset to examine how resources can be maximized:

We must put aside our *turfs* and our *purse-strings*, in order to overcome the challenges that dwindling resources present... It is critical for all leaders at the district level to support this effort, in order to empower all personnel to collaborate in new and effective ways... Managing change is difficult, and to be successful, we have to meet the needs of all children, regardless of the ways we choose to fund programs. Far too often, in our silos we have said, "No, we can't do that because..." rather than working together to eliminate the silos. We are [too] comfortable with the inflexibility we have created.¹

Such coordination is permitted by federal law and encouraged by the Tennessee Department of Education (TDOE). This manual provides guidance to LEAs in coordinating funds.

- Coordinated Spending to Maximize Funds – Braiding and Blending
- Framework for Coordinated Spending
- Comprehensive Initiatives – Funding Quick Guides
- Considerations When Braiding or Blending Funds
- Appendices
 - Supplement not Supplant Requirements; and
 - Program Overviews

Questions about this guidance should be directed to Eve.Carney@tn.gov.

TDOE Strategic Plan and Goals – Tennessee Succeeds

As we begin a new chapter at the department, we will build on the strong foundation in each of our schools and districts to realize our goals for Tennessee students. If we are successful:

Districts and schools in Tennessee will exemplify excellence and equity such that all students are equipped with the knowledge and skills to choose their path in life.

This is our unifying vision: success for all students upon graduation from high school. This is how Tennessee Succeeds.

Achieving Success after Graduation

- Tennessee will continue its rapid improvement and rank in the top half of states by 2019 as measured by fourth and eighth grade National Assessment of Educational Progress (NAEP).
- By 2020, the average ACT composite score in Tennessee will be 21 allowing more students to earn HOPE scholarships.
- The majority of high school graduates will go on to earn a certificate, diploma, or degree as measured by a 55 percent post-secondary completion within six years for the class of 2020.

To achieve success after graduation, we will organize our work around the following strategic priorities.

- District Empowerment
- Educator Support
- All Means All
- High School and Bridge to Postsecondary
- Early Foundations and Literacy

The TDOE strategic plan can be used as a guide for developing LEA strategic plans and school improvement plans.

LEA Strategic Plans and School Improvement Plans

Every LEA and school is required to develop a plan outlining goals and strategies to improve student outcomes. These plans are based on a comprehensive needs assessment. In ePlan, priority goals are identified with specific timelines, benchmarks, and action steps.

LEAs and schools can leverage funds by coordinating grant spending to support activities that drive performance and improve outcomes for all students.

SECTION I: COORDINATED SPENDING TO MAXIMIZE FUNDS

LEAs and schools have the flexibility to *braid* and *blend* funds in certain instances. The decision on whether it is appropriate to braid or blend funds is program and situation specific.

Braiding Funds

Using multiple funding sources in a collaborative manner to support educational initiatives ensures consistency and eliminates duplication of services. Braiding funds is a way for LEAs and schools to use multiple federal grants to support various parts of an initiative while **maintaining the award-specific identity**.

For example, assume School A receives Title I funds and is operating a school-wide program. The school wishes to implement an early warning system to identify struggling students. The school could use Title I funds to pay for the system.² If the school did not have enough Title I money to pay for the entire cost, the LEA could contribute CEIS (funds set aside under IDEA to provide early intervening services to non-disabled, struggling students) and/or IDEA, Part B funds to support part of the system.³ The LEA could also contribute Title II to help the school provide professional development to school staff on how to use the data produced by the system to improve student achievement.⁴

In this scenario, various grants are coordinated to support the early warning system. The activities are allowable under each applicable grant, yet these grants continue to maintain their identity and expenditures for each are documented by the LEA or school.

Federal law authorizes LEAs to coordinate spending from different grant programs provided the activities are permitted under the grant program and the LEA or school maintains documentation on how federal funds are spent.⁵

Blending Funds

Combining multiple funding sources to support educational initiatives can ensure consistency, eliminate duplication of services, and reduce burden. Blending funds allows for more flexibility than braiding funds. In school-wide programs, eligible grants and other resources are combined under a single set of reporting requirements, and the dollars from each individual funding stream **lose the original award-specific identity**.⁶

For example, School B receives Title I, Title II, CEIS, and IDEA funds and is operating a school-wide program. The school wishes to implement an early warning system to identify struggling students. School B elects to consolidate its federal grant funds to support its school-wide program. School B could use any combination of available funds in the consolidated pool to support the early warning system as long as an early warning system is part of its approved school-wide plan, based on a comprehensive needs assessment.

In this scenario, School B consolidates its federal grant funds, and those funds lose their original award-specific identity. Since the school-wide plan identifies a need for the initiative, the school can still fund the early warning system, professional development, and other intervening services but does not have to track individual grant expenditures.

Federal law authorizes recipients operating school-wide programs to consolidate spending from federal, state, and local funds to support the implementation of the school-wide program as long as the school demonstrates that the intent and purpose of the program are met.⁷

SECTION II: FRAMEWORK FOR COORDINATED SPENDING

The *five-step framework* below can help simplify the process of identifying how federal funds can be used to support a comprehensive initiative. This framework can be used for any initiative in which an LEA is considering using federal funds.

Step 1 – Assess the Needs

Assess LEAs needs, identify barriers to increase student achievement, and implement activities to address those needs.

By utilizing data to conduct a comprehensive needs assessment, this step helps the LEA prioritize its needs, set goals and strategies, and identify action steps. It is critical to identify and include all stakeholders who should be involved in the decision-making process (academic staff, fiscal/grants staff, teachers, parents, etc.)

Step 2 – Identify Components and Costs of Activities

Review and breakdown each activity to identify the components of the activity and the costs associated with each component.

Federal grants may be able to support some costs, but not others. By getting specific early in the planning stages about the components the LEA needs in order to carry out an activity, LEAs can have a clearer understanding of the possible federal resources available to support the overall activity.

For example, a literacy program for elementary and middle grades could entail:

- Purchasing a software program;
- Technology needs;
- Professional development for teachers in use of software and technology;
- Instructional supplies; and
- Literacy coaches.

Step 3 – Identify Federal Grants

Determine which federal grants can support the various component costs of each activity.

Federal grants are intended for specific purposes and can only support certain types of activities, depending on the specific requirements of the program. (See appendices for more details.) These requirements must be taken into account when determining if a specific federal grant can support a specific cost. For example, federal programs contain:

- **Eligibility requirements:** Most grants have specific eligibility criteria defining the student or school population that can be served by the program. Costs may only support activities benefitting the population(s) identified in the law.
- **Permissible grant activities:** Many grants have a “use of funds” section in the statute that outlines the types of costs that can, and in some cases must, be paid with grant funds. Some grants, such as Title I, Part A, do not have a specific use of funds section. In this case, activities must be consistent with the purpose and goals of the grant.

- **Spending Limits:** Some grants permit certain costs to be charged, but only up to a specified amount or percentage. Costs that exceed the limit are not permitted. For example, there is a 15 percent limit on the amount an LEA can use for Coordinated Early Intervening Services (CEIS) purposes in IDEA.
- **Mandatory set-asides:** Some grants require funds to be spent on specific costs or require a designated percentage of funds to be spent on specific activities.
- **Fiscal rules:** All federal education programs have fiscal rules that impact spending choices such as supplement not supplant, maintenance of effort, and comparability. It is important to note that a rule with the same name, such as supplement not supplant, may work differently in different programs as detailed in Appendix A.

Step 4 – Determine if Costs are Necessary and Reasonable

*Once a federal grant is identified as a potential funding source for a component cost, determine if the cost is **necessary** and **reasonable** and will benefit the federal program relevant to the amount funded.*

Among other requirements, any cost charged to federal programs must be necessary for the performance or administration of the program. The cost must also be reasonable in light of the amount of money being spent and the needs of the LEA.

In practice, this means an LEA should be able to:

- Explain how the cost helps fulfill the federal program requirements (for example, how the cost addresses LEA needs and furthers federal program goals); and
- Justify the amount spent (including being able to show the amount paid constitutes a fair market value).

Step 5 – Verify Consistency with ePlan and Program Plans

Ensure that the cost is consistent with ePlan and other relevant program plans.

In order to maximize resources, LEAs should review the plans submitted via ePlan (LEA and school-level plans) to ensure alignment and to identify any areas where duplication may exist. LEAs are encouraged to have a single, comprehensive plan for all students in ePlan – rather than multiple program-specific plans, which do not correlate.

SECTION III: COMPREHENSIVE INITIATIVES – FUNDING QUICK GUIDES

Lack of clarity over how federal formula funding sources can be used inhibits the implementation of comprehensive strategies with federal funds. The charts below illustrate how state, local, and federal funds can be used to support the sample comprehensive initiatives detailed in this section. Note that in many cases it is possible to support a component cost with more than one federal funding source. **It is important to note that it is presumed that both the LEA and school-level activities will be implemented in Title I schools operating school-wide programs.**

Improve Effective Instruction for Literacy & Numeracy														
Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.														
* If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.														
ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA								IDEA			Perkins *	
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *		Pre-K *
		A	1003 (a) *	1003 (g) *	A	B *								
LEA Level			iZone	iZone										
Purchasing supplemental instructional materials	X	X	X	X		X	X	X	X	X	X	X	X	X
Supporting data analysis	X	X	X	X	X	X	X		X		X	X		X
Teacher mentoring and coaching	X	X	X	X	X	X	X		X		X	X		X
Professional development activities	X	X	X	X	X	X	X		X		X	X		X
Induction programs for new teachers	X	X	X	X	X	X	X		X		X			
Financial incentives and awards to attract and retain effective teachers for priority and focus schools, or hard to staff areas	X	X	X	X	X	X			X		X			
Principal academies to improve the instructional leadership skills of principals	X	X	X	X	X		X		X					
School Level														
Purchasing effective instructional materials, including intervention materials for struggling students	X	X	X	X		X	X	X	X	X	X	X	X	
Induction programs for new teachers		X	X	X		X	X							X

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		A	1003 (a) *	1003 (g) *	A	B *								
Teacher mentoring and coaching	X	X	X	X	X	X	X		X		X			X
Professional development on effective instructional practices for teachers and principals (including stipends to teachers for participating in professional development and release time)	X	X	X	X	X	X	X		X		X	X	X	
Professional development on effective instructional practices	X	X	X	X	X	X	X		X		X	X	X	X
Professional development on effective classroom management	X	X	X	X	X		X		X		X	X	X	X
Stipends and release time for mentor teachers	X	X	X	X	X				X		X			X
Teacher leader programs	X	X	X	X	X	X			X		X			
Extra pay, or other programs, for exemplary teachers	X	X	X	X	X				X		X			
Purchasing effective instructional materials to meet the needs of students with disabilities	X	X	X	X		X	X				X		X	
Purchasing assistive technology to help students with disabilities access effective instruction	X										X		X	
Planning and implementing new learning environments supportive of all learners, including students with disabilities, within an inclusive setting (depending on how this is implemented, IDEA might only be able to pay for part of the cost of this activity)	X	X	X	X			X		X		X	X		

Improve Effective Instruction for Literacy & Numeracy

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		A	1003 (a) *	1003 (g) *	A	B *								
Teacher mentoring and coaching relevant to meeting the needs of students with disabilities	X	X	X	X	X	X	X		X		X		X	
Professional development relevant to meeting the needs of students with disabilities	X	X	X	X	X	X	X		X		X		X	

Provide Instructional Coaches, Specialists and Other Supports for Teachers

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		A	1003 (a) *	1003 (g) *	A	B *								
LEA Level			iZone	iZone										
Hiring or contracting with instructional coaches to assist teachers in improving instruction	X	X	X	X	X	X	X		X			X		
Teacher mentoring programs in schools	X	X	X	X	X	X	X		X		X			
Induction programs for new teachers in schools	X	X	X	X	X	X	X		X					
School Level														
Stipends and/or release time to permit effective teachers to support other teachers to improve instruction	X	X	X	X	X	X	X		X		X	X		
Hiring school-based instructional coaches	X	X	X	X	X	X	X		X		X	X		
Hiring school-based content experts to mentor and support other teachers	X	X	X	X	X	X	X		X		X			
Adding time to the day or redesigning the school schedule to provide teachers with collaborative planning opportunities	X	X	X	X	X		X		X					
Induction programs for new teachers	X	X	X	X	X	X	X		X					
Professional development for teachers in content knowledge and classroom strategies	X	X	X	X	X	X	X		X		X	X	X	X
Professional development activities involving collaborative groups of teachers and administrators	X	X	X	X	X	X	X		X		X	X	X	X

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		A	1003 (a) *	1003 (g) *	A	B *								
Professional development activities that provide training in improving student behavior in the classroom and identifying early and appropriate interventions to help struggling students	X	X	X	X	X		X		X		X	X	X	X
Training on how to use data and assessments to improve classroom practice and student learning	X	X	X	X	X	X	X		X		X	X	X	X
Teacher advancement initiatives that promote professional growth and leadership of teachers	X	X	X	X	X	X	X		X					
Instructional coaches to assist teachers in delivering improved instruction for students with disabilities	X	X			X		X		X		X		X	
Induction programs for new teachers teaching students with disabilities	X	X			X		X		X		X		X	

Upgrading the Existing Curriculum

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		A	1003 (a) *	1003 (g) *	A	B *								
LEA Level			iZone	iZone										
Convening committee of stakeholders to identify key issues to be addressed with existing curriculum in order assess curriculum updates necessary to improve student outcomes	X	X	X	X		X	X		X		X		X	
Developing student materials to implement the upgraded curriculum	X	X	X	X		X	X		X		X		X	
Developing teacher pacing and sequencing guides for grade- and subject-level objectives to support the upgraded curriculum	X	X	X	X		X	X		X		X		X	
Developing grade- and subject-level assessments to measure student progress with the upgraded curriculum	X	X	X	X		X	X		X		X		X	
Developing teacher training materials aligned with the upgraded curriculum	X	X	X	X	X	X	X		X		X		X	
Developing sample lesson plans and assessment materials for the upgraded curriculum	X	X	X	X		X	X		X		X		X	
Professional development on effective instructional practices for teachers and principals (including stipends to teachers for participating in professional development and release time)	X	X	X	X	X	X	X		X		X		X	

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		A	1003 (a) *	1003 (g) *	A	B *								
Purchasing textbooks to support the upgraded curriculum	X													
Purchasing supplemental materials to support the upgraded curriculum	X	X	X	X			X		X		X	X	X	
Parent and community meetings to inform and collaborate with stakeholders	X	X	X	X			X		X		X		X	

Redesign, Maximize or Extend School Day, Week or Year

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		A	1003 (a) *	1003 (g) *	A	B *								
LEA Level			iZone	iZone										
Stipends for teachers participating in after school or summer programs to improve instruction	X	X	X	X		X	X		X		X	X	X	
Stipends for after school and summer program site administrators	X	X	X	X			X		X			X		
Guidance counselors for students, family outreach, etc. to assist students with summer credit recovery for graduation	X	X	X	X			X		X			X		
Transportation for students attending after school or summer programs to improve instruction	X	X	X	X			X	X	X					
Instructional supplies, materials, software and equipment to implement after school or summer programs	X	X	X	X			X	X	X		X	X	X	
School Level														
Reconfiguring the schedule and school day to maximize instructional time	X	X	X	X					X		X			
Stipends for teachers participating in after school programs to improve instruction	X	X	X	X		X	X		X		X	X	X	
Stipends for after school program site administrator	X	X	X	X			X		X			X		
Transportation for students attending after school to improve instruction	X	X	X	X			X	X	X					

Redesign, Maximize or Extend School Day, Week or Year

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		A	1003 (a) *	1003 (g) *	A	B *								
Instructional supplies, materials, and equipment to implement after school programs	X	X	X	X			X	X	X		X	X	X	
Professional development in-services and webinars to provide implementation strategies to redesign classes to support personalized learning	X	X	X	X	X	X	X		X		X	X		
Costs for providing enrichment activities to students participating in after school or summer programs	X	X	X	X			X		X		X		X	

Advanced Coursework Options for Students

Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.

*** If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.**

ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA								IDEA			Perkins *	
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *		Pre-K *
		A	1003 (a) *	1003 (g) *	A	B *								
LEA Level			iZone	iZone										
Develop or provide professional development for school-level staff on how to prepare low-achieving students to participate in advanced coursework	X	X	X	X	X	X	X		X		X	X		X
Parental involvement activities for parents regarding the importance of advanced coursework	X	X	X	X			X		X		X			
Supplemental curricular materials to assist low-performing students to participate and succeed in advanced coursework	X	X	X	X			X	X	X		X	X		X
School Level														
Coursework to prepare struggling students so they can effectively participate in advanced courses (including courses/coursework during the school day, instructional materials, additional school time through tutoring to improve literacy and study skills, intensive summer school, etc.)	X	X	X	X			X		X		X	X		X
Instructional specialists that can assist a school in establishing and implementing advanced coursework portfolios as a method to improve student achievement for all students	X	X	X	X			X		X		X	X		
Professional development activities for teachers	X	X	X	X	X	X	X		X		X	X		X

Advanced Coursework Options for Students

Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.

*** If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.**

ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA								IDEA			Perkins *	
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *		Pre-K *
		A	1003 (a) *	1003 (g) *	A	B *								
Parental involvement activities to better inform families about how and why rigorous coursework is important to college and career-readiness	X	X	X	X			X		X		X			
Mentoring and support activities to encourage students to participate in advanced coursework	X	X	X	X			X		X		X			
Data analysis to determine which students might need additional help in order to access and succeed in advanced coursework	X	X	X	X	X		X	X	X		X			X
AP/IB/advanced STEM curricular materials, including strengthening materials so that a more diverse student population will engage in advanced coursework	X	X	X	X		X	X		X		X			X
AP/IB test fees in limited cases for low-income students where the cost of the test is the responsibility of the student’s parents and not the school or LEA	X	X	X	X			X		X		X			X

Advanced Coursework Options for Students

Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.

*** If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.**

ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA									IDEA			Perkins *
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *	Pre-K *	
		A	1003 (a) *	1003 (g) *	A	B *								
Professional development activities for teachers, and in some cases other building staff, on: <ul style="list-style-type: none">Preparing students for advanced courseworkTeaching advanced courseworkSupporting struggling students enrolled in advanced coursework	X	X	X	X	X	X	X		X		X	X		X
Professional development activities for general education teachers to ensure special education students have access to and can succeed in advanced coursework opportunities	X	X	X	X	X	X	X		X		X			
Curricular modifications to ensure advanced coursework is accessible for special education students	X										X		X	

Response to Instruction and Intervention (RTI²)

Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.

*** If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.**

ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA								IDEA			Perkins *	
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *		Pre- K *
		A	1003 (a) *	1003 (g) *	A	B *								
LEA Level			iZone	iZone										
LEA RTI Coordinator to coordinate the LEA program, review overall progress of schools, and lead the development of the LEA RTI implementation plan	X													
LEA-level early warning data system software and materials to improve the academic achievement of students achieving below grade level	X													
Academic coaches to provide embedded professional development to teachers about RTI implementation and to assist with student intervention plans and data analysis	X	X	X	X	X	X			X		X	X		
Academic interventionists to work with <i>students</i> to improve the academic achievement of struggling learners	X	X	X	X			X		X			X		
Academic interventionists to work with <i>teachers</i> to improve the academic achievement of struggling learners	X	X	X	X	X	X	X		X		X	X	X	
Professional development, including job-embedded supports, for interventionists or existing teachers for effective RTI implementation (Tiers 2 & 3)	X	X	X	X	X		X		X		X	X		
Universal screener purchased for all schools in the LEA	X													

Response to Instruction and Intervention (RTI²)

Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.

*** If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.**

ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA								IDEA			Perkins *	
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *		Pre-K *
		A	1003 (a) *	1003 (g) *	A	B *								
School Level														
School-level early warning data system software and materials to improve the academic achievement of students achieving below grade level	X	X	X	X					X		X	X		
Teacher materials and supplies	X	X	X	X	X		X	X	X		X	X		
Student materials and supplies	X	X	X	X			X	X	X		X	X		
Progress monitoring tools for use with individual students or entire class	X	X	X	X			X		X		X	X		
Academic interventionists to work with <i>students</i> to improve the academic achievement of struggling learners	X	X	X	X			X		X			X		
Professional development, including job-embedded supports, for interventionists or existing teachers for effective RTI implementation (Tiers 2 & 3)	X	X	X	X	X	X	X		X		X	X		
Support the use of progress monitoring data to improve services for students	X	X	X	X			X		X		X	X		

Positive Behavioral Interventions and Support (PBIS)

Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.

*** If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.**

ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA								IDEA			Perkins *	
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *		Pre-K *
		A	1003 (a) *	1003 (g) *	A	B *								
LEA Level			iZone	iZone										
LEA PBIS Coordinator to lead the LEA program and the development of the LEA implementation plan	X													
Professional development for teachers and administrators in order to implement PBIS (including contracting with experts in PBIS)	X		X	X	X		X		X		X	X	X	
Stipends to teachers who attend training, particularly during the summer	X		X	X	X		X	X	X		X	X	X	
School Level														
Planning and implementing new PBIS system for all students	X	X	X	X			X		X		X	X	X	
Professional development for teachers and administrators in order to implement PBIS (including contracting with experts in PBIS)	X	X	X	X	X		X		X		X	X	X	
Stipends to teachers who attend training, particularly during the summer	X	X	X	X	X		X	X	X		X	X	X	
Hiring specialists or compensating existing staff to provide PBIS	X	X	X	X					X			X		
Informational items such as posters and pamphlets to inform students and parents of PBIS	X	X	X	X					X			X		
Parent and community involvement training and activities to support PBIS	X	X	X	X			X		X		X		X	

Ninth Grade Academy

Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.

*** If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.**

ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA								IDEA			Perkins *	
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *		Pre-K *
		A	1003 (a) *	1003 (g) *	A	B *								
LEA Level			iZone	iZone										
LEA coordinator to implement 9 th grade academy model	X													
Compensate existing administrative staff to manage credit recovery in after school or summer programs	X	X							X					
Professional development for teachers and principals on identifying and providing transitional services and instructional practices (including stipends to teachers for participating in professional development and release time)	X	X	X	X	X		X		X		X	X		
School Level														
Hiring additional 9 th grade counselors to improve counselor/student ratio	X	X	X	X					X			X		
Hiring credit recovery instructors to provide credit recovery to provide credit recovery in after school or summer programs	X	X	X	X			X		X			X		
Compensate existing staff to provide credit recovery in after school or summer programs	X	X	X	X			X		X			X		

Ninth Grade Academy

Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.

*** If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.**

ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA									IDEA			Perkins *
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *	Pre-K *	
		A	1003 (a) *	1003 (g) *	A	B *								
Professional development for teachers and principals on identifying and providing transitional services and instructional practices (including stipends to teachers for participating in professional development and release time)	X	X	X	X	X		X		X		X	X		
Parent and community involvement meetings and activities	X	X	X	X			X		X		X			

Pre-Kindergarten Programs

Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.

*** If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.**

ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA								IDEA			Perkins *	
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *		Pre-K *
		A	1003 (a) *	1003 (g) *	A	B *								
LEA Level			iZone	iZone										
LEA Pre-K Coordinator to lead the LEA program	X													
Teachers and educational assistants	X						X		X		X		X	
Professional development, including job-embedded supports for teachers	X	X			X		X		X		X		X	
Instructional supplies, materials, software, and equipment for the Pre-K program	X						X		X		X		X	
Costs for providing enrichment activities to students participating in Pre-K programs	X						X		X		X		X	
Transportation of students participating in the Pre-K program	X										X		X	
School Level														
Professional development, including job-embedded supports for teachers	X	X	X	X	X		X		X		X		X	
Instructional supplies, materials, software, and equipment for the Pre-K program	X	X	X	X			X		X		X		X	
Costs for providing enrichment activities to students participating in Pre-K programs	X	X	X	X			X		X		X		X	

Dropout Prevention

Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.

*** If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.**

ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA								IDEA			Perkins *	
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *		Pre-K *
		A	1003 (a) *	1003 (g) *	A	B *								
LEA Level			iZone	iZone										
Professional development to support teachers in addressing the needs of at-risk students	X	X	X	X	X		X		X		X	X		X
Developing and implementing data systems to identify students at risk of dropping out	X	X	X	X					X					
Summer school programs	X	X	X	X			X		X			X		
School Level														
School climate interventions, including interventions such as: attendance incentive programs, student support systems that connect small groups of students with adults and service learning and peer tutoring	X	X	X	X			X		X		X	X		X
Improving student transition through summer programs or 9 th grade academies	X	X	X	X			X		X		X	X		X
School-based instructional improvement strategies such as credit recovery programs, re-engagement strategies, smaller learning communities, competency-based instruction, and acceleration of basic reading and mathematics skills	X	X	X	X			X		X		X	X		X
Extended school day, week or year programs to support students at risk of dropping out	X	X	X	X			X	X	X			X		X
Summer school programs	X	X	X	X			X		X			X		
Developing school-level early warning systems to identify students at risk of dropping out	X	X	X	X					X		X			

Dropout Prevention

Note: Where Title I funds are marked, the use of funds is only allowable in Title I schools operating school-wide programs.

*** If the funds are marked with an *, the specific program requirements must be met for eligible school, teacher and/or student activities. Reference the appendices for program overviews and supplement not supplant requirements applicable to each program.**

ACTIVITIES * Funding must meet the specific program requirements for eligible school, teacher, and/or student activities.	State Local	ESEA								IDEA			Perkins *	
		Title I			Title II		Title III, A *	Title IV, B *	Title VI, B *	Title X *	Part B *	CEIS (15%) *		Pre-K *
		A	1003 (a) *	1003 (g) *	A	B *								
Professional development activities for teachers relevant to drop-out prevention and other early intervention strategies for struggling students	X	X	X	X	X		X		X		X	X		X
Academic interventions for at-risk students with disabilities	X	X	X	X			X		X		X			
Positive behavioral supports and other school climate initiatives to address the needs of students with disabilities	X	X	X	X					X		X			
Secondary transition services for students with disabilities	X	X	X	X							X			
Academic and behavioral supports for children not identified for special education but who need additional academic and behavioral support to succeed in a general education environment if done as part of the coordinated early intervening services (CEIS) set-aside	X	X	X	X					X		X			

IV: CONSIDERATIONS WHEN BRAIDING OR BLENDING FUNDS

Barriers to Coordinated Grant Spending

Two challenges often serve as barriers to coordinating funds; permissive use of funds and supplement not supplant requirements. To help LEAs in addressing these barriers and utilizing federal grants to their fullest potential, the appendices provides streamlined overviews of the grant programs, including information about use of funds and supplement not supplant rules.

1. **Identifying permissive uses of funds:** Each federal grant has its own rules on what kind of activities the grant can support and who can participate in those activities. LEAs must follow these rules when coordinating spending, but often flexibility exists within grants that allows funds to be spent on a broader array of goods, services, and activities. For example:
 - *LEAs can use Title I for more than reading and math remediation.* Title I can support a variety of activities to improve student achievement including, but not limited to, preparing students for advanced coursework, school climate interventions, adding common planning time for teachers, as well as supporting other academic subjects such as arts, science, engineering or social studies.
 - *LEAs can reserve some IDEA, Part B funds to deliver coordinated early intervening services (CEIS) to K-12 struggling students who have not been identified with a disability.*
2. **Complying with federal supplement not supplant requirements:** Supplement not supplant is a rule that applies to most federal grants and is designed to ensure federal funds provide extra support beyond what an LEA would otherwise spend on education. Program specific requirements can be found in Appendix A.

Traditionally, compliance with this requirement is tested on a cost-by-cost basis, and supplanting is generally presumed if an LEA spends federal funds on:

- Activities the LEA is required to carry out per state law or policy;
- Activities the LEA funded with state or local funds last year; and
- Activities provided for other students with state or local funds.

LEAs: Other Administrative Considerations

Braiding Funds – (funds maintain award-specific identity)

When an LEA elects to braid multiple federal/state funding sources to support a single project, there are important administrative considerations that must be taken into account. Specifically, the LEA must be able to demonstrate allocability: costs charged to each federal program were allocable to that program. In other words, if a federal program funds a portion (or all) of a project, that program must receive the benefit relative to the contribution it makes. LEAs must maintain appropriate time and effort documentation, inventory records, and procedures and financial management records.

Blending Funds – (funds lose award-specific identity)

LEAs may only blend specified ESEA funds for consolidated administration. An LEA may use consolidated funds for the administration of the consolidated programs at the LEA and school levels

comparable to those authorized for the SEA. An LEA that consolidates administrative funds may not use any other funds under the programs included in the consolidation for administration.⁸

An LEA that consolidates administrative funds is not required to keep separate records of administrative costs for each individual program. Expenditures of consolidated administrative funds are allowable if they are for administrative costs that are allowable under any of the contributing programs.⁹

Covered programs as defined in section 9101(13) may be included in an LEA consolidated application or plan:

- Title I, Part A (Improving the Academic Achievement of the Disadvantaged)
- Title I, Part C (Education of Migratory Children)
- Title I, Part D (Programs for Children and Youths Who are Neglected, Delinquent, or At-Risk)
- Title I, Part 1003(g) (School Improvement Grants)
- Title II, Part A (Preparing, Training, and Recruiting High Quality Teachers and Principals)
- Title II, Part B (Mathematics and Science Partnerships)
- Title III (Language Instruction for Limited English Proficient and Immigrant Students)
- Title IV, Part B (21st Century Community Learning Centers)
- Title VI, Part B (Rural Education Achievement Program)

Schools: Other Administrative Considerations

Braiding Funds – (funds maintain award-specific identity)

At the school level, Title I school-wide programs have more options than LEAs have to leverage flexibility of federal and non-federal funds to improve outcomes for students. If a school is operating a school-wide program and elects not to consolidate funds, opportunities still exist to utilize multiple funding sources to support initiatives. There are more administrative requirements in this scenario since separate fiscal accounting records would be required, and there may be instances where it would be difficult to allocate certain activities. These activities must still be based on a needs assessment and part of the school-wide plan and be necessary and reasonable to accomplish the program's purpose.

Blending Funds – (funds lose award-specific identity)

Title I schools operating a school-wide program may blend funds under Title I, Part A with other federal, state, and local funds to upgrade the school's entire educational program. When a school elects to blend funds to operate a school-wide program to support all students, there are administrative considerations that must be taken into account. Specifically, a school that blends funds from different programs to support a school-wide program is not required to maintain separate fiscal accounting records, by program, as long as the school can demonstrate that the school-wide program as a whole addresses the intent and purposes of each program whose funds were consolidated.

Note that the school-wide plan must be based on a comprehensive needs assessment and interventions should be aligned with the school's needs assessment.

Time and Effort Considerations

Individuals paid in part or in full by a federal grant must maintain appropriate documentation to comply with standards for documentation of personnel expenses.¹⁰

A cost objective is defined as a program, function, activity, award, organizational subdivision, contract, or work unit for which cost data are desired and for which provision is made to accumulate and measure the cost of processes, products, jobs, capital projects, etc. The key to determining whether an employee is working on a single cost objective is whether the employee's salary and wages could be supported in full from each of the federal awards on which the employee is working, or from the federal award alone if the employee's salary is also paid with non-Federal funds.

Individuals working in schools operating a school-wide program are working on a single cost objective, the school-wide plan; therefore, some administrative burdens are alleviated.

Additional flexibility was granted in 2013 when ED issued a letter and supporting documents to alleviate some of the administrative burden by submitting a request to use a substitute system at the school level for personnel working a set schedule. An SEA could allow an LEA to use alternative documentation—such as a teacher's course schedule—instead of PARs to document the time and effort of an individual who works on multiple activities or cost objectives but does so on a predetermined schedule. This documentation would be submitted semi-annually, rather than monthly.¹¹

Inventory and Supply Considerations

All items purchased with federal funds must benefit the program supporting the cost. This requires LEAs to have systems in place to track the items they purchase with the federal funds in order to demonstrate the items are being used in a manner that benefits the relevant program. LEAs operating state-administered programs must follow state and local inventory management laws, policies and procedures, as well as federal requirements.¹²

Procedures for managing equipment must meet the following requirements:

- a) Property records – description, serial number or other ID, source of funding, title, acquisition date and cost, percent of federal participation, location, use and condition, and ultimate disposition date including sale price
- b) Physical inventory at least every two years
- c) Control system to prevent loss, damage, theft (all incidents must be investigated)
- d) Adequate maintenance procedures
- e) If authorized or required to sell property, proper sales procedures to ensure highest possible return

Tracking and Records

How an LEA tracks specific items will depend on:

- a) Federal requirements, if applicable;
- b) State and local law, policies, and procedures; and
- c) The nature of the item.

Some non-equipment items are more vulnerable to loss or theft, such as laptops, and other small or sensitive items. LEAs should use tracking methods to provide a reasonable assurance these items can be located. Examples of tracking controls may include, but are not limited to:

- a) Individual property records such as those described above;
- b) Labeling items so they are clearly identified as property of the LEA and/or a particular funding source; and
- c) Requiring employees using an item to sign it out so the LEA can identify which employee has custody of the item.

In addition to equipment, LEAs should be able to demonstrate that supplies purchased with federal funds were received by the program, used by the program, and safeguarded from unauthorized use.

Financial Management Considerations

To comply with federal financial management standards, when braiding funds LEAs and schools must use fiscal controls and fund accounting procedures that ensure proper disbursement of and accounting for federal funds. In short, this means LEAs must take steps to ensure:

- a) Federal funds are spent properly on allowable costs; and
- b) There is sufficient evidence to prove the funds were spent properly.

APPENDICES

APPENDIX A: SUPPLEMENT NOT SUPPLANT

Confusion over the supplement not supplant requirement can be a barrier to coordinating federal grant funds. The supplement not supplant requirement is applied differently depending on the federal program. The chart below will help LEAs understand the requirements in order to coordinate spending of federal grant funds effectively.

Title I, Part A – Improving the Academic Achievement of the Disadvantaged	
LEA-Level Title I Spending	
Title I, Part A, § 1120A(b)	<p>Supplanting is presumed in three situations if an <u>LEA</u> uses Title I funds:</p> <ol style="list-style-type: none">1. to provide services the LEA is required to make available under other federal, state, or local laws;2. to provide services the LEA provided with state or local funds in the prior year; or3. to provide the same services to Title I schools that the LEA provides with state or local funds to non-Title schools. <p>Exceptions</p> <ul style="list-style-type: none">• An LEA spends Title I funds to support activities mandated by state law if those mandates were enacted to facilitate the state's ESEA Flexibility plan.¹³• An LEA may overcome the second presumption of supplanting if it can demonstrate (with evidence) that the program or activity will be eliminated due to state or local funding reductions.¹⁴• An LEA that temporarily shifts a cost from Title I to state and local funds because of <u>federal</u> funding cuts may move the costs back to Title I once federal funding is restored without violating supplement not supplant.¹⁵• "Title I-like" activities supported by <i>supplemental</i> state and local funds are excluded from the supplement not supplant analysis (see "Title I-like Exclusion for Supplanting" section below).¹⁶

School-wide School Spending – Supplemental Funds Test	
Title I, Part A, § 1114(a)(2)(B)	<p>At the school level, a different supplanting test applies to Title I schools operating school-wide programs, not the three basic supplanting presumptions noted in the prior section. A school participating in a school-wide program shall use funds available to carry out this section only to supplement the <u>amount</u> of funds that would, in the absence of funds under this part, be made available from non-Federal sources for the school, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency.</p> <p>The LEA must ensure the school receives all the state and local funds it would receive were it not a Title I school-wide program school.¹⁷ For example, if an LEA allocates state and local resources to schools using a student enrollment/staffing ratio model, the LEA must demonstrate that Title I school-wide schools receive all staffing positions paid with state and local funds that non-Title I schools receive. In other words, an LEA may not reduce its allocation of state and local funds and resources to a school-wide program school because the school receives Title I funds to operate a school-wide program.</p>
Targeted Assistance School Spending	
Title I, Part A, § 1120A(b); § 1115	<p>Supplanting is presumed in three situations if a Targeted Assistance School (TAS) uses Title I funds:</p> <ol style="list-style-type: none"> 1. to provide services the TAS is required to make available under other federal, state, or local laws; 2. to provide services the TAS provided with state or local funds in the prior year; or 3. to provide the same services to Title I students that the TAS provides with state or local funds to non-Title I students. <p>Exceptions</p> <ul style="list-style-type: none"> • The same exceptions apply to TAS as listed in prior section for LEA-level Title I spending.

“Title I–Like” Exclusion for Supplanting	
34 CFR § 200.79	<p>Activities funded with <i>supplemental</i> state or local funds are excluded from a supplanting analysis if they meet “the intent and purposes of Title I.”¹⁸</p> <p>The policy behind this exclusion is to permit LEAs to use state and local funding mechanisms to expand the reach of Title I. Under the exclusion, state and local funds that are “Title I-like” – i.e. that are supplemental state and local funds to support activities that would be permissible under Title I – do not trigger a presumption of supplanting. For example, normally an LEA would violate the third presumption of supplanting if it used Title I funds to pay for reading coaches to work with struggling readers in Title I schools while using state or local funds to pay for such coaches in non-Title I schools. An LEA could, however, use <i>supplemental</i> state or local funds to support the reading coaches for struggling readers in non-Title I schools without running afoul of supplement not supplant restrictions. This is because the <i>supplemental</i> state or local funds provide extra support to struggling readers and do not displace (i.e. supplant) state and local money.</p> <p>Due to the complex nature of what constitutes <i>supplemental</i> state and local funds, TDOE will rely on LEAs to demonstrate how the state or local funds at issue supplement normal spending and meet the intent and purposes of Title I, and TDOE will evaluate on a case-by-case basis. LEAs that would like assistance with this analysis should contact Consolidated Planning and Monitoring.</p>
Title I, Part C – Education of Migratory Children	
Title I, Part C, § 1304(c)(2)	<p>Supplanting is presumed if Title I, Part C is used:</p> <ol style="list-style-type: none"> 1. to provide services required to be made available under state or local laws; or 2. to provide services provided with state or local funds in the prior year. <p>Currently, in Tennessee, the department does not award or allocate Title I, Part C funds to LEAs. The department partners with a non-profit entity to identify and serve migrant students in all LEAs across the state.</p>
Title I, Part D – Programs for Children and Youth Who are Neglected, Delinquent, or At-Risk	
Title I, Part D, § 1415(b)	<p>Title I, Part D programs must supplement the number of hours of instruction students receive from state and local sources without regard to the subject areas in which instruction is given during those hours.</p>

Title I, Part 1003(g) – School Improvement Grants (SIG)	
Title I, § 1003(g); § 114(a)(2)(B); § 1120A(b)	<p>A school participating in a school-wide program shall use funds available to carry out this section only to supplement the <u>amount</u> of funds that would, in the absence of funds under this part, be made available from non-Federal sources for the school, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency.</p> <p>The LEA must ensure the school receives all the state and local funds it would receive were it not a Title I school-wide program school.¹⁹ For example, if an LEA allocates state and local resources to schools using a student enrollment/staffing ratio model, the LEA must demonstrate that Title I school-wide schools receive all staffing positions paid with state and local funds that non-Title I schools receive. In other words, an LEA may not reduce its allocation of state and local funds and resources to a school-wide program school because the school receives Title I funds to operate a school-wide program.</p> <p>For a targeted assistance program, Title I, Part 1003(g) is not subject to supplement not supplant requirements.</p>
Title II, Part A – Preparing, Training, and Recruiting High Quality Teachers and Principals	
Title II, Part A, § 2123(b)	<p>Supplanting is presumed if an LEA uses Title II:²⁰</p> <ol style="list-style-type: none"> 1. to provide services the LEA is required to make available under other federal, state, or local laws; or 2. to provide services the LEA provided with state or local funds in the prior year. <p>Exception</p> <ul style="list-style-type: none"> • An LEA may overcome the second presumption of supplanting if it can demonstrate it cannot continue to support an activity with state or local funds because of state or local funding reductions. <p>Title II funds could supplement state and local mandates. For example, if state law mandated a certain number of hours of professional development on a particular topic, Title II could support additional training on that topic.</p>
Title II, Part B – Mathematics and Science Partnerships	
Title II, Part B, §2202(a)(4)	Title II, Part B funds must be used to supplement, and not supplant, funds that would otherwise be used for activities authorized under this part.

Title III – Language Instruction for Limited English Proficient and Immigrant Students	
Title III, Part A, §3115(g)	<p>Title III, Part A funds must be used to supplement the level of <u>other</u> federal, state, and local public funds that, in the absence of Title III funds, would have been expended for programs for limited English proficient children and immigrant children and youth and in no case to supplant such <u>other</u> federal, state, and local public funds.²¹</p> <p>The LEA must ensure that any services provided with Title III, Part A funds are supplemental and could not be used to meet a requirement of any other federal programs, including Title I, Part A.</p>
Title IV, Part B – 21 st Century Community Learning Centers	
Title IV, Part B §4203(a)(9); §4204(b)(2)(G)	Title IV, Part B funds must be used to increase the level of state, local, and <u>other</u> federal funds that would, in the absence of these funds, be made available for programs and activities authorized by Title IV, Part B, and in no case supplant such state, local, and <u>other</u> federal funds.
Title VI, Part B – Rural Education Achievement Program	
Title VI, Part B, § 6232	Title VI, Part B funds must be used to supplement, and not supplant, any <u>other</u> federal, state, or local education funds.
Title X, Part C – Education for Homeless Children and Youths	
Title X, Part C, §723(2)(A)(iii); §723(3)	Services provided with Title X, Part C funds shall not replace, but must supplement, the regular academic program and shall be designed to expand upon or improve services provided as part of the school's regular academic program.
IDEA, Part B – Individuals with Disabilities Education Act	
IDEA (34 CFR § 300.202(a)(3))	IDEA, Part B funds must be used to supplement state, local, and <u>other</u> federal funds used for providing services to children with disabilities. If an LEA meets maintenance of effort, it will satisfy the supplement not supplant requirements of the IDEA. ²²

IDEA, CEIS – Coordinated Early Intervening Services	
IDEA (34 CFR § 300.226(e))	<p>The general supplement not supplant requirement for IDEA funds in 34 CFR §300.202(a)(3) states that funds provided to LEAs under Part B of the IDEA must be used to supplement state, local, and <u>other</u> federal funds and not to supplant those funds. This requirement applies to all Part B funds including any used for CEIS.</p> <p>In addition, 34 CFR §300.226(e) states that CEIS funds may be used to carry out CEIS aligned with activities funded and carried out under the ESEA if those funds are used to supplement, and not supplant, funds made available under the ESEA for the activities and services assisted using CEIS funds.</p> <p>Supplanting is presumed if an LEA uses IDEA funds:</p> <ol style="list-style-type: none"> 1. to provide services the LEA is required to make available under <u>other</u> federal, state, or local laws; or 2. to provide services that were paid for with other funds in a prior year, including, if the IDEA funds are used for CEIS activities coordinated with activities funded under the ESEA, and the IDEA funds are used to provide services that were paid for with ESEA funds in the prior year.
Carl D. Perkins Career and Technical Education (CTE)	
CTE, P.L. 109-270, Title III, Part A, § 311	<p>Perkins is governed by a supplement not supplant provision.²³ Supplanting is presumed when an LEA uses Perkins funds:</p> <ol style="list-style-type: none"> 1. to provide services the LEA is required to make available under state or local laws; or 2. to provide services the LEA provided with state or local funds in the prior year. <p>In addition, ED's Office of Career Technical and Adult Education presumes supplanting when an LEA uses Perkins funds to provide a service to career and technical education students that the LEA provides to nonparticipating students with state or local funds.²⁴</p>

APPENDIX B: PROGRAM OVERVIEWS

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

What it is

Title I, Part A provides federal dollars to supplement educational opportunities for children who live in high poverty areas and are most at risk of failing to meet the state's challenging academic achievement standards.

ED awards Title I grant funds to TDOE, which subgrants funds to LEAs. LEAs reserve funds for mandatory set-asides and other district-level instructional initiatives. The remaining Title I funds must flow to eligible schools through a formula known as "spiraling" in Tennessee (also called "ranking and serving").

Intent and Purposes

Title I, Part A of the ESEA, as amended provides financial assistance to LEAs and schools with high percentages of children from low-income families to help ensure that all children meet challenging state academic achievement standards. Federal funds are currently allocated through four statutory formulas that are based primarily on census poverty estimates and the cost of education in each state.²⁵ Federal rules define programs that meet the intent and purposes of Title I as follows:

In a school with at least 40 percent poverty (school-wide programs), an activity meets the intents and purposes of Title I if it:

- Is designed to promote school-wide reform and upgrade the entire educational operation of the school to support students in their achievement toward meeting the state's challenging academic achievement standards that all students are expected to meet;
- Is designed to meet the educational needs of all students in the school, particularly the needs of students who are failing, or most at risk of failing, to meet the state's challenging student academic achievement standards; and
- Uses the state's assessment system to review the effectiveness of the program.

In schools with a rate of poverty below 40 percent (targeted assistance programs), an activity meets the intents and purposes of Title I if it:

- Serves only students who are failing, or most at risk of failing, to meet the state's challenging student academic achievement standards;
- Provides supplementary services designed to meet the special educational needs of the students who are participating in the program; and
- Uses the state's assessment system to review the effectiveness of the program.

What it can fund

The goal of Title I is to raise the academic achievement of low-achieving, economically disadvantaged students and those most at risk of failing to meet state's challenging achievement standards.

- Administrative and educational salaries and benefits:
 - Title I Director

- Title I Secretary
- Administrative Assistants
- Teachers
- Educational Assistants (Paraprofessionals)
- System-wide Personnel
- Equipment
- Materials and supplies
- Professional development
- Homeless set aside (required in LEAs with both Title I and non-Title schools)
- Parent involvement/engagement activities (required 1 percent set aside if allocation > \$500,000)
- Pre-school programs, but not solely since Title I-A was designed for K-12
- Note: LEAs cannot transfer money out of Title I but may transfer money into Title I from another eligible Title allocation; however, this increases the amount of required reservations or earmarks, including equitable services for students in participating private schools.

At the school level, there are two Title I program models:

- **School-wide program model:** Any school with at least 40 percent poverty, as well as any priority or focus school, may operate a school-wide program as long as the school conducts a comprehensive needs assessment and develops a school-wide plan for meeting those needs.²⁶ The premise behind the school-wide model is that comprehensive improvement strategies – rather than separate, add-on services – are most effective in raising academic achievement for the lowest achieving students in a school. This is best accomplished by a school addressing the root causes of low performance. Highlights of the school-wide program model include:
 - All students and staff may participate in Title I-funded activities.
 - The school may use Title I funds to support any reasonable activity designed to improve the school's educational program as long as it is consistent with the school's needs and plan.
 - Depending on its needs, a school-wide program school could use Title I funds to:
 - Upgrade the curriculum for the entire school;
 - Implement an early warning system;
 - Extend the school day or school year;
 - Reorganize class schedules to increase teacher planning and collaboration time;
 - Improve the school's discipline process;
 - Hire additional teachers;
 - Reorganize classes to promote personalized learning;
 - Implement career academies;

- Implement school safety programs; and
- Address climate or school culture issues.
- **Targeted assistance program model:** Any Title I school that does not operate a school-wide program (<40 percent poverty) must operate a targeted assistance program. In a targeted assistance program, the school uses Title I funds to provide additional supports to specifically identified students struggling to meet state standards.
 - Only certain students may participate in Title I funded activities including:
 - Students identified as failing, or most at risk of failing, to meet state standards, (based on academic need – not poverty);
 - Students who participated in Head Start or a Title I-funded preschool program within the past two years;
 - Migrant students;
 - Neglected and delinquent students; or
 - Homeless children.
 - The school must spend Title I funds on supplemental activities to improve the academic achievement of eligible students such as:
 - Support for core academic subjects including English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history and geography;
 - Positive behavioral supports, attendance incentive programs, parent/community engagement, and school climate interventions if needed to improve student achievement;
 - Health, nutrition, and other social services if funds are not reasonably available from other sources, and, provided the school has engaged in a comprehensive needs assessment and established a collaborative partnership with local service providers.

At the LEA level, LEAs must retain funds for certain LEA-level activities such as:

- Parental involvement (if the LEA receives an allocation of \$500,000 or more);
- Services for homeless, neglected, or delinquent students who do not attend Title I schools; and
- Equitable services for eligible private school students.

In addition, LEAs may reserve funds:

- To administer Title I programs:
 - For LEA-managed initiatives in Title I schools such as school improvement activities, professional development, or other permissible Title I activities;
 - Administrative costs for non-public school services; and
 - To provide financial incentives and rewards to teachers who serve students in Title I schools that meet the definitions of Priority Schools and Focus Schools for the purpose of attracting and retaining qualified and effective teachers.

Maximize the school-wide program model. Title I spending is most flexible at the school level in school-wide program schools. School-wide program schools can use Title I funds to support activities needed to upgrade the school's educational program as long as the activities are consistent with the school's needs and school-wide plan, including instructional and support services that benefit all students.

Title I, 1003(a) – School Improvement

What it is

The SEA must reserve four percent of its Title I, Part A allocation to fulfill its school improvement responsibilities. These funds must support priority and focus schools as identified by the department.

Intent and Purposes

In allocating funds for this discretionary grant, the SEA must give priority to LEAs with the lowest achieving schools, which demonstrate greatest need and strongest commitment to improve, and meet annual achievement goals.

What it can fund

The goal of Title I, 1003(a) is to raise the academic achievement of the state's lowest performing Title I schools.

- Activities or interventions related to improving achievement and gap closure in priority and focus schools
- LEA support, including Innovation Zones (iZones)
- Strengthening the school's academic program
- After school and summer programs
- Maximizing instructional time
- Professional development for teachers
- Human capital (strong leaders, effective teachers, instructional coaches, etc.)
- Parent and community engagement
- Climate and culture
- Safe and supportive schools

Title I, 1003(g) – School Improvement Grants

What it is

School Improvement Grants (SIG), are competitive subgrants to LEAs to serve identified schools that demonstrate the greatest need for the funds and the strongest commitment to use the funds to provide adequate resources in order to raise the achievement of students in their lowest-performing schools.²⁷

Intent and Purposes

Schools are required to implement one of the seven federal intervention models: turnaround, transformation, restart, closure, whole school reform model, preschool, and other.

What it can fund

The goal of Title I, 1003(g) is to raise the academic achievement of the state's Title I priority schools.

- Provide strong leaders (recruit and retain, signing and retention bonuses, training, etc.)
- Ensure teachers are effective and able to improve instruction (training, stipends for professional development, etc.)
- Provide additional time for instruction through the extension of the school day, week, or year
- Strengthen the school's instructional program
- Use data to inform instruction and continuous improvement
- Establish a safe and supportive school environment
- Provide ongoing mechanisms for family and community engagement
- LEA support, including Innovation Zones (iZones)

Title I, Part C – Education of Migratory Children

What it is

The general purpose of the Migrant Education Program (MEP) is to ensure that migrant children fully benefit from the same free public education provided to other children. 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.

Intent and Purposes

The TDOE uses program funds to identify eligible children and provide educational and related support services. These services include:

- Academic instruction;
- Remedial and compensatory instruction;
- Bilingual and multicultural instruction (as appropriate);
- Vocational instruction;
- Career education services;
- Special guidance;
- Counseling and testing services;
- Health services; and
- Pre-school services.

Children are eligible to receive MEP services if they meet the definition of *migratory child* and if the basis for their eligibility is properly recorded on a certificate of eligibility (COE). Any child, birth through age 21, who meets the statutory definition of *migratory child* may be served by the MEP. (Note: Only children ages 3 through 21 may be counted for state funding purposes.)

What it can fund

Funds support high quality education programs for migratory children and help ensure that migratory children who move among the states are not penalized in any manner by disparities among states in curriculum, graduation requirements, or state academic content and student academic achievement standards.

Funds also ensure that migratory children are provided with appropriate education services (including supportive services) that address their special needs. These children should also receive full and appropriate opportunities to meet the same challenging state academic content and student academic achievement standards that all children are expected to meet. Federal funds are allocated by formula to SEAs, based on each state's per pupil expenditure for education and counts of eligible migratory children, age 3 through 21, residing within the state.

Several education laws give SEAs, LEAs, and other entities greater flexibility in how they use federal program funds to support state and local school improvement efforts. Flexibility initiatives,²⁸ such as transferability, provide administrators with the opportunity to adapt federal programs to meet their needs.²⁹

Currently, in Tennessee, the department does not award or allocate Title I, Part C funds to LEAs. The department partners with a non-profit entity to identify and serve migrant students in all LEAs across the state. This entity collaborates with district staff and provides programming and services to migrant students and their families. All LEAs must still comply with required reporting and service responsibilities to migrant students (such as enrollment, free lunch, equal access to education and extracurricular activities, services, and more).

Title I, Part D – Programs for Children and Youth Who are Neglected, Delinquent, or At-Risk

What it is

The neglected or delinquent subpart 1 program provides formula grants to SEAs to award subgrants to state agencies to operate educational programs for children and youth in institutions or community day programs for children who are neglected, delinquent, or at-risk, and for children and youth in adult correctional facilities.

The subpart 2 program provides formula grants to SEAs to award subgrants to LEAs to provide programs that serve children who are in locally operated correctional facilities or are attending community day programs for delinquent children and youth. Additionally, subpart 2 programs may provide assistance to children and youth who are neglected or at-risk of dropping out.

Neglected: children who have been either voluntarily, or by state law, placed in a facility or group home due to abandonment, neglect, or death of their parents or guardians. All programs transition children back to the community. Some of these children attend public school.

Delinquent: children who have been adjudicated to be delinquent or in need of supervision. All institutions transition children back to the community. For safety reasons, delinquent children have limited access to the community.

Intent and Purposes

The purposes of Title I, Part D are 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;
- Provide activities that facilitate the transition of such children and youth from the correctional program in an institution to further education or employment; and
- Operate dropout prevention programs in local schools for children and youth who are at-risk of dropping out or youth returning from correctional facilities.

What it can fund

Neglected and delinquent programs support supplemental instruction in core subject areas, such as reading and mathematics, as well as tutoring, counseling, and transition services. To be eligible for state neglected or delinquent funds, juvenile institutions must provide 20 hours a week of instruction from nonfederal funds; adult correctional institutions must provide 15 hours.

Note: LEAs are funded by two sources: Title I, Part D and Title I, Part A Local Neglected. ESEA regulations address the Local Neglected Program under the umbrella of the Title I, Part D Neglected, Delinquent, or At-Risk Subpart 2 Program.³⁰

Though there are no ESEA regulations to address the Title I, Part A Local Neglected Program, ESEA regulations indicate that Title I, Part A funding is used to increase the academic achievement of the disadvantaged. Title I, Part A funding is used to provide supplemental support so that schools will make gains and reduce achievement gaps in core subjects, graduation rates for high schools, and attendance for grades K-8. The emphasis is on reading, language arts, and math. Title I, Part A will also pay for supplemental professional development training and research-based activities.

Title II, Part A – Preparing, Training, and Recruiting High Quality Teachers and Principals

What it is

Title II, Part A is an ESEA program which places a major emphasis on teacher quality as an integral factor in improving student achievement. This program is designed to increase the number of highly effective teachers and principals.

Intent and Purposes

The purpose of Title II, Part A is to improve teacher and leader quality and focuses on preparing, training, and recruiting high-quality teachers and principals.

What it can fund

An LEA that receives a subgrant shall use the funds made available to carry out one or more of the following activities:

- Recruiting and retaining effective teachers and leaders, including specialists in core academic subjects, principals, and pupil services personnel
- Providing monetary incentives such as scholarships, signing bonuses, or differential pay for hard to staff subjects
- Reducing class size
- Implementing innovative professional development programs that focus on technology literacy, tenure reform, and merit pay programs
- Professional development activities that improve the knowledge of teachers and principals and, in appropriate cases, paraprofessionals to improve instruction:
 - Core academic subjects
 - Effective classroom practices: research-based, effective instructional strategies, methods, and skills
 - Differentiation, especially with regard to students with disabilities and students with limited English proficiency
 - Engagement of parents in their children's education, including parents of limited English proficient and immigrant children
 - Use of data and assessments to improve classroom practices and student learning

Title II, Part B – Mathematics and Science Partnerships

What it is

The Mathematics and Science Partnership (MSP) is funded through Title II, Part B of ESEA. MSP is designed to improve the content knowledge of teachers and the performance of students in the areas of mathematics and science by encouraging Institutes of Higher Learning (IHEs), LEAs, and elementary and secondary schools to participate in programs that:

- Improve and upgrade the status and stature of mathematics and science teaching by encouraging IHEs to improve mathematics and science teacher education;
- Focus on the education of mathematics and science for teachers as a career-long process;
- Bring mathematics and science teachers together with scientists, mathematicians, and engineers to improve their teaching skills; and
- Provide summer institutes and ongoing professional development for teachers to improve their knowledge and teaching skills.

Intent and Purposes

The ultimate goal of this grant is to improve the mathematics and science knowledge of Tennessee students in high-need LEAs. The MSP grant competition is intended to support the creation and implementation of professional development programs. The program is intended to enhance the content knowledge and pedagogical skills of mathematics and science classroom teachers in grades K-12 to improve student learning in these areas.

1. Conduct meaningful professional development in mathematics and science content that models research-based instructional strategies that enables teachers to provide instruction to improve student learning and performance.
2. Bring mathematics and science teachers in participating schools together with IHE scientists, mathematicians, and engineers to increase subject matter knowledge of mathematics and science, and to improve instructional skills through the use of technology, computing facilities, libraries, and other resources available at institutions of higher education.
3. Develop and/or introduce mathematics and science instructional and assessment materials that are rigorous and carefully aligned with Tennessee State Standards in mathematics and science to better prepare students for entry and success in postsecondary studies and careers in engineering, mathematics, and science.
4. Emphasize that the education and evaluation of mathematics and science teachers are career-long processes that continuously stimulate intellectual growth and significantly update and improve knowledge and skills for instruction, including the effective integration of technology.

What it can fund

Partnerships of LEAs and IHEs may apply for grants through a competitive application process with criteria outlined in the request for proposal (RFP) process.

To be eligible, such partnerships must include:

1. An engineering, mathematics, and/or science department at an institution of higher education; and

2. A high-need LEA as defined by the SEA through the RFP process.

The state requires that proposals provide evidence of consultation with representatives of private schools prior to the development and design of professional development programs to encourage participation of eligible non-public schools.

Use of Funds

A partnership must use funds for one or more of the following activities to improve mathematics and/or science instruction in grades K-12 that is ongoing and intensive, research-based, technology-based professional development for mathematics and science teachers that:

1. Enhances the ability of elementary and secondary teachers to understand and implement challenging academic content standards for mathematics and science and select curriculum materials that directly address rigorous standards, instructional shifts, and provide feedback on the effectiveness of these instructional practices in the classroom;
2. Targets strategies for addressing gaps in achievement for students with disabilities;
3. Includes the use of formative and summative assessment data to evaluate effectiveness of training; or
4. Incorporates the use of technology-based instruction.

Title III – Language Instruction for Limited English Proficient and Immigrant Students

What it is

The Title III, Part A program is designed to improve the education of limited English proficient (LEP) children and youth by helping them learn English and meet challenging state academic content and student academic achievement standards. The program provides enhanced instructional opportunities for immigrant children and youth. Funds are distributed to SEAs based on a formula that takes into account the number of immigrant and LEP students in each state.

Intent and Purposes

The purposes of Title III are as follows:³¹

- To help ensure that children who are limited English proficient, including, immigrant children and youth, attain English proficiency, develop high levels of academic attainment in English and meet the same challenging state academic content and student academic achievement standards as all children are expected to meet;
- To assist all LEP children, including immigrant children and youth, to achieve at high levels in the core academic subjects so that those children can meet the same challenging state academic content and student academic achievement standards as all children are expected to meet;
- To develop high-quality language instruction educational programs (LIEPs) designed to assist SEAs, LEAs, and schools in teaching LEP children and serving immigrant children and youth;
- To assist SEAs and LEAs to develop and enhance their capacity to provide high-quality instructional educational programs designed to prepare LEP children and youth, to enter all-English instruction settings;
- To assist SEAs, LEAs, and schools to build their capacity to establish, implement, and sustain LIEPs and programs of English language development for LEP children;
- To promote parental and community participation in LIEPs for the parents and communities of LEP children;
- To streamline LIEPs into a program carried out through formula grants to SEAs and LEAs to help LEP children, including immigrant children and youth, develop proficiency in English, while meeting challenging state academic content and student academic achievement standards;
- To hold SEAs, LEAs, and schools accountable for increases in English proficiency and core academic content knowledge of LEP children by requiring:
 - Demonstrated improvements in the English proficiency of LEP children each fiscal year; and
 - Annual Measurable Achievement Objectives (AMAOs) for LEP children, including immigrant children and youth.
- To provide SEAs and LEAs with the flexibility to implement LIEPs based on scientifically-based research on teaching LEP children that the agencies believe to be the most effective for teaching English.

What it can fund

Required subgrantee activities for which funds are to be used:³²

- To increase the English proficiency of LEP children by providing high-quality LIEPs that are based on scientifically-based research demonstrating the effectiveness of the programs in increasing English proficiency and student academic achievement in core academic subjects;
- To provide high-quality professional development to classroom teachers (including teachers in classroom settings that are not the settings of LIEPs), principals, administrators, and other school or community-based organizational personnel, that is:
 - Designed to enhance the ability of teachers to understand and use curricula, assessment measures, and instruction strategies for LEP children;
 - Designed to improve the instruction and assessment of LEP children;
 - Based on scientifically-based research demonstrating the effectiveness of the PD in increasing English language proficiency (ELP) or substantially increasing the subject matter knowledge, teaching knowledge, and teaching skills of such teachers; and
 - Of sufficient intensity and duration to have a positive and lasting impact on the teachers' performance in the classroom.

The subgrantee may use Title III funds³³ to:

- Upgrade program objectives and implement effective instructional strategies;
- Improve the instruction program for LEP children by identifying, acquiring, and upgrading curricula, instruction materials, educational software, and assessment procedures;
- Provide tutorials and intensified instruction to students;
- Develop and implement LIEPs that coordinate with other relevant programs and services;
- Provide community participation programs, family literacy services, and parent outreach and training activities to LEP children and families; and
- Improve the instruction of LEP students by providing for acquisition of educational technology or instructional materials, access to and participation in electronic networks for materials, training and communication, or incorporation of resources into curricula and programs.

The supplement not supplant clause³⁴ requires that Title III funds be supplemental to local, state, and any other federal funds. LEAs must think creatively and plan spending carefully in order to maximize the use of Title III funds.

- Truly supplemental materials, such as grade level interest reading material on a lower reading level and literary pieces at a grade level in reading that are understandable
- Manipulative materials that may help with skills that are lagging due to interrupted formal education
- Creation of after school or summer school programs that are specifically for English language acquisition for students and/or parents
- Support of the first language by providing support and reading materials in the native language

- Bilingual texts when appropriate (students must be provided texts in English as other students are)
- Professional development that is job embedded or in a long range plan
- Professional development that includes non-ESL teachers to provide them with cultural awareness/sensitivity and an understanding and ESL issues
- Transportation for ESL activities that are truly supplemental to other school offerings
- Data support to use the assessment information to inform instruction
- Parent training focusing on cultural aspects such as driving, school attendance, time by U.S. standards, etc.

Title IV, Part B – 21st Century Community Learning Centers

What it is

This program supports the creation of community learning centers that provide academic enrichment opportunities during non-school hours for children, particularly students who attend high-poverty and low-performing schools. The program helps students meet state and local student standards in core academic subjects, such as reading and math; offers students a broad array of enrichment activities that can complement their regular academic programs; and offers literacy and other educational services to the families of participating children.

Intent and Purposes

The 21st Century Community Learning Centers grants can only be awarded to programs that primarily serve students who attend schools with a high concentration of low-income students. This is defined specifically for schools eligible for designation as a Title I school-wide program. To be eligible for this designation, at least 40 percent of the students must qualify or receive free or reduced-cost meals through the National School Lunch Program.

What it can fund

The 21st Century Community Learning Centers provide a broad array of supplemental services, programs, and activities that are designed to reinforce and complement the regular academic program of participating students. Such activities/programs may include:

- Remedial education
- Academic enrichment
- Math & science activities
- Arts & music activities
- Limited English proficient classes
- Tutoring & mentoring programs
- Assistance to truant, suspended, or expelled students
- Recreational activities
- Technology programs/telecommunication
- Expanded library hours
- Parent involvement/family literacy
- Drug & violence prevention
- Counseling programs
- Character education
- Entrepreneurial education

In addition, community learning centers may offer opportunities for literacy and related educational development to family members of participating students, including school-readiness activities for younger siblings of students being served.

Examples of how the funding can be used are listed below:

- Salaries and benefits of program staff
- Transportation of students to and from the program
- Instructional supplies and materials
- Professional development for key program staff
- Work with community partners to supplement program services. For example, community partners may help sponsor field trips for student participants.

Maximize funds with the following tips:

- Utilize the USDA Afterschool Snack program to provide healthy snacks for students each day instead of using program funds.
- Connect with national and local service organizations to recruit volunteer tutors for the program. All volunteers must be properly vetted and trained before being cleared to work with students.
- Collaborate with existing educational programs like Family Resource Centers and Coordinated School Health to provide professional development or other services.

Title VI, Part B – Rural Education Achievement Program

What it is

Small, Rural School Achievement (SRSA)

The purpose of this program is to provide financial assistance to rural LEAs to assist them in meeting their achievement goals. Applicants do not compete but rather are entitled to funds if they meet basic eligibility requirements. Eligibility is restricted by statute. Awards are issued annually directly to eligible LEAs on a formula basis.

Rural and Low-Income Schools (RLIS)

Awards are issued annually to SEAs, which make subgrants to LEAs that meet the applicable requirements. Awards are made to all SEAs that apply and meet the applicable requirements of the act. If an SEA does not participate, awards are issued by ED to eligible LEAs in the state either competitively or by formula.

Note: LEAs receiving an SRSA grant are not eligible to receive an RLIS grant.

Intent and Purposes

LEAs receiving funds for Title VI may use program funds to conduct activities under various ESEA programs. For this reason, it is one of the most flexible funding streams.

What it can fund

Recipients may use program funds to conduct the following activities:

- Teacher recruitment and retention, including the use of signing bonuses and other financial incentives;
- Teacher professional development, including programs that train teachers to use technology to improve teaching and that train teachers of students with special needs;
- Support for educational technology, including software and hardware, that meets the requirements of ESEA, Title II, Part D (Enhancing Education Through Technology; # 84.318);
- Parental involvement activities;
- Activities authorized under the Safe and Drug-Free Schools and Communities: State Grants program (ESEA, Title IV, Part A, Subpart 1; # 84.186A);
- Activities authorized under ESEA, Title I, Part A (Improving Basic Programs Operated by LEAs; # 84.010); and
- Activities authorized under ESEA, Title III (Language Instruction for Limited English Proficient and Immigrant Students).

Title X, Part C – Education for Homeless Children and Youths

What it is

Formula grants are made to the 50 states, the District of Columbia, and Puerto Rico based on the amount of each state's share of Title I, Part A, funds. The outlying areas and the Bureau of Indian Affairs also receive funds. Among other things, the program supports an office for coordination of the education of homeless children and youths in each state, which gathers comprehensive information about homeless children and youths and the impediments they must overcome to attend school consistently.

These McKinney-Vento subgrants also help SEAs ensure that homeless children, including preschoolers and youths, have equal access to free and appropriate public education (FAPE). States must review and revise laws and practices that impede such equal access. States are required to have an approved plan for addressing problems related to the enrollment, attendance, and success of homeless children in school. States must make competitive subgrants to LEAs to facilitate the enrollment, attendance, and success in school of homeless children and youths. This includes addressing problems due to transportation needs, immunization and residency requirements, lack of birth certificates and school records, and guardianship issues.

All LEAs, whether they receive a McKinney-Vento subgrant, must comply with required identification, reporting, and service responsibilities to homeless children and youth (such as enrollment, transportation, free lunch, equal access to education and extracurricular activities, services, and more).

Intent and Purposes

LEAs engage in coordination and collaboration with other departments, local organizations, and agencies to provide comprehensive services to homeless children and youths and their families. LEAs also offer expedited evaluations of the needs of homeless children to help them enroll in school, attend regularly, and achieve success.

What it can fund

- Tutoring, mentoring, supplemental instruction, and enriched educational services that are linked to the achievement of academic standards
- Academic services offered outside the normal school day, during the summer, and/or holiday breaks
- Clothing for daily dress, school uniforms, and PE requirements
- Personal hygiene items
- Food
- Transportation to and from the school of origin
- Transportation to and from academic activities outside of the scheduled school day
- School supplies such as backpacks, calculators, etc.
- Course fees
- Counseling services or referrals
- Fees for IB, AP, GED, and SAT/ACT exams

- Dental, mental health, medical, and other services (including eyeglasses, hearing aids, physical examinations, etc.)
- Related professional development and training materials for staff
- Education and training to the parents of homeless children and youth about rights of and resources available to children and youth in transition
- Salaries and benefits of personnel serving students and families in transition (such as the LEA liaison)
- Fees and costs associated with tracking, obtaining, and transferring records necessary for school enrollment (birth certificates, immunization records, academic records, evaluations for special programs or services, guardianship or legal records, etc.)

Maximize funds with the following tips:

- Collaborate with PTAs, PTSOs, family engagement, and parent events at the school level
- Coordinate with other programs and schools within the LEA to avoid duplication of services and to maximize services (tutoring, mentoring, hosting parent events, field trips, etc.)
- Collaborate with shelters and with government agencies such as DHS, HUD, police department, and public libraries
- Partner with local non-profits, faith-based organizations, food banks, and businesses for donations (food, clothing, services, haircuts, event tickets, books and other supplies, hygiene items, etc.)
- Partner with post-secondary institutions (such as social work, counseling, or education programs) to provide services
- Provide access to technology and/or devices for students to assist them with homework and/or remediation
- Provide additional textbooks for students to take with them after the school day to assist with homework
- Use approved private vehicle contractors, public transportation vouchers, etc. as available and appropriate
- Provide training of key staff at least annually while they are in attendance at other workshops or conferences; design online trainings and materials for them to reference and re-use as needed

IDEA, Part B – Individuals with Disabilities Education Act

What it is

IDEA, Part B provides supplemental federal funds to pay for the excess cost of providing a free appropriate public education (FAPE) to children with disabilities.

Intent and Purposes

The grant is awarded in two parts:

1. Section 611 funds support students ages 3 to 21 who have been identified as children with disabilities in accordance with IDEA, Part B 611 requirements.
2. Section 619 funds support students ages 3 to 5 who have been identified as children with disabilities in accordance with IDEA, Part B 619 requirements.

In limited cases, IDEA-funded services can benefit non-disabled students. For example:

- LEAs may, and in some cases must, reserve funds to provide coordinated early intervening services (CEIS) to struggling students that have not yet been identified for special education.³⁵ (See the IDEA, CEIS program overview for specific information.)
- LEAs may use funds for the costs of special education and related services, and supplementary aids and services, provided in a regular class or other education-related setting to a student with a disability in accordance with the student's individualized education program (IEP), even if one or more non-disabled children benefit from these services.³⁶
- LEA-funded staff can provide limited services to non-disabled students as long as the benefit is *incidental*. For example, an LEA might be able to include non-disabled students in a class being led by an IDEA-funded teacher for students with disabilities as long as the teacher does not have to perform any extra activities for the non-disabled students. For an example of how that might work, please reference the letter from ED's Office of Special Education Programs.³⁷

What it can fund

Excess cost is a fiscal test to ensure LEAs use IDEA, Part B funds to support the extra cost of providing special education and related services to students with disabilities.³⁸ Assuming an LEA meets IDEA excess cost requirements, it may use IDEA, Part B to fund a range of activities that support students with disabilities including:

- Special education teachers and administrators;
- Related services providers (speech therapists, psychologists, etc.);
- Materials and supplies for use with children with disabilities;
- Professional development for personnel who work with students with disabilities (including regular education teachers that teach students with disabilities); and
- Specialized equipment or devices to assist students with disabilities.

LEAs may also coordinate IDEA, Part B funds with other funding sources to support students with disabilities participating in larger whole school initiatives.³⁹ Some related examples include:

- Learning environments supportive of all learners in an inclusive setting based on universal design for learning strategies;
- School climate or positive behavior intervention and support strategies;
- Programs to promote the social and emotional development of young children;
- Programs to support the transition of students with disabilities from high school to college or career; and
- Merging separate special education data systems into existing elementary, secondary, post-secondary and workforce systems.

Take advantage of early intervention opportunities: LEAs may reserve up to 15 percent of their IDEA, Part B funds to provide CEIS to struggling students who have not been identified with a disability.

Coordinate IDEA with other funding sources: LEAs may coordinate IDEA with other funding sources to support students with disabilities as part of an LEA's overall improvement effort. For example, IDEA can be used with other funding sources to deliver interventions to struggling students in an inclusive setting, upgrade curricula to serve all students in an inclusive setting, or integrate special education data into an LEA's other data systems.

IDEA, CEIS – Coordinated Early Intervening Services

What it is

LEAs may use up to 15 percent of their IDEA, Part B funds to develop and implement coordinated early intervening services (CEIS) for students who are not currently identified as needing special education or related services.⁴⁰

CEIS is a set of coordinated services for students in kindergarten through grade 12 (with a particular emphasis on students in K-3) who are not currently identified as needing special education or related services, but who need additional academic and behavioral support to succeed in a general education environment.⁴¹

Intent and Purposes

CEIS funds may only be used to provide interventions to students who need academic or behavioral support to succeed in the general education environment.

CEIS funds may not be used to provide interventions to students who are currently identified as needing special education and related services.

What it can fund

- Professional development for teachers and other school staff to enable personnel to deliver scientifically-based academic and behavioral interventions
- Direct interventions, such as educational and behavioral evaluations, services, and supports
- Services aligned with activities funded under the ESEA

If an LEA chooses to use CEIS funds for services to children who need academic and behavioral support, it must ensure that CEIS funds are used for one or more of the following three purposes:

- To provide professional development solely to educators who are responsible for students who need additional academic and behavioral support to succeed in a general education environment;
- To provide direct interventions, such as the services of a reading teacher or behavior specialist, or materials and supplies directly related to those services or interventions. For example, CEIS funds may be used to provide behavioral interventions to non-disabled students who receive a certain number of office referrals or to provide instructional interventions to students who have not reached grade-level proficiency on statewide assessments; and
- To provide services aligned with activities funded under the ESEA, such as Title I or Title III activities.

IDEA, Pre-K

What it is

IDEA Part B, Section 619 provides for supplemental funding to LEAs in order to provide eligible, identified special education preschool aged children (ages 3-5) with instructional and related services.

Intent and Purposes

The IDEA Preschool program for eligible special education children ages 3 through 5 was developed to ensure the provision of a free appropriate public education in the least restrictive environment. The program's emphasis is on special education and related services which are designed to provide for the student's unique needs and prepare them for further education. It also ensures that the rights of children with disabilities and their parents are protected and that LEA programs are assessed to ensure quality and effectiveness of services.

What it can fund

This program can fund any services that are supplemental in nature to those provided by SEAs or LEAs through state or locally funded programs, to eligible preschool students (ages 3 through 5) identified under one of the federal disability categories (excludes Tennessee's gifted and functionally delayed categories). This could include additional teachers, educational assistants, supplemental supplies and materials, and/or related services such as occupational therapy or physical therapy. All services must be determined through the IEP process (for public school students) or a service plan (for private school students).

- Use inclusion practices as available and practical.
- Look at additional funding sources such as general purpose special education (GP SPED) funds, IDEA Part B 611 funds or funding through outside grants.
- When available, take advantage of IDEA Preschool 619 Discretionary grant funding.
- For high cost students, budget services through GP SPED in order to receive some relief through high cost reimbursement when available.

Carl D. Perkins Career and Technical Education (CTE)

What it is

Perkins is a federal grant program that provides supplemental resources to support academic and career and technical skills of secondary students who elect to enroll in career and technical education programs.

ED awards CTE Title I funds to TDOE, which subgrants funds to LEAs. LEAs may choose to spend funds at the central level or to allocate funds to schools for school-level spending.

Intent and Purposes

A career and technical education program is defined as a sequence of courses that:

- Provides students with coherent and rigorous content aligned with challenging academic standards and relevant technical knowledge and skills needed to prepare for further education or careers in current or emerging professions;
- Provides technical skills proficiency, an industry-recognized credential, a certificate or an associate degree; and
- Includes competency-based applied learning that contributes to academic knowledge and relevant skills.⁴²

LEAs must carry out certain required activities including:

- Strengthening the academic and career and technical education skills of students participating in CTE programs;
- Linking CTE at the secondary and postsecondary levels;
- Providing students with strong experience in, and understanding of, all aspects of an industry;
- Developing, improving, or expanding the use of technology in CTE;
- Providing professional development;
- Developing and implementing evaluations of Perkins-funded CTE programs, including an assessment of how the needs of special populations are met;
- Initiating, improving, expanding, and modernizing quality CTE programs;
- Providing services and activities that are of sufficient size, scope, and quality to be effective;
- Preparing special populations for high skill, high wage, or high demand occupations that will lead to self-sufficiency.⁴³

What it can fund

Perkins funds must be spent consistent with the LEA's local plan submitted to TDOE. The local plan must, among other things, describe the activities the LEA will carry out in order to meet its agreed-upon local levels of performance.⁴⁴

In general, LEAs may use Perkins funds to improve career and technical education programs.⁴⁵

While not defined in the statute, *improve* generally means to modernize, revise, expand, upgrade, but not to maintain existing programs. In general, ED applies a *three-year rule* on funding an activity with Perkins funds.

LEAs are not required to spend Perkins funds in each of these categories, but must carry out these activities with either Perkins or another funding source.⁴⁶

An LEA that carries out these required activities may then spend Perkins funds on other activities.⁴⁷

Perkins funds can support college- and career-readiness strategies for CTE students such as:

- Professional development for CTE teachers on integrating college- and career-readiness standards into the CTE curriculum;
- Strengthening the academic skills of students who participate in CTE programs;
- Linking high school and postsecondary CTE programs; and
- Developing small, career themed learning communities to provide CTE.

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- ⁵ 34 CFR § 76.760.
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- ⁸ Elementary and Secondary Education Act § 9203; (20 USC 7823).
- ⁹ Elementary and Secondary Education Act §§ 9201(c) and 9203(e); (20 USC 7821(c) and 7823(e)).
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