

Consolidated Application: ESSA Titles I-A, II-A, III-a, & IV-A

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Learning Objectives

- Best practices for LEAs to build their ConApp Budgets and Plans
- Understanding the difference between Transferability & Consolidation.
- Creating and Using Schoolwide and Targeted Assistance Plans
- Program implementation should be reflected in your ConApp and vice versa

Building Budgets & Plans

Pop Quiz!

What programs must you consult with, aside from your Title programs, when completing you consolidated application?

- a) Individuals with Disabilities Education Act
- b) Workforce Innovation an Opportunity Act
- c) Strengthening Career and Technical Education for the 21st Century Act
- d) McKinney-Vento Act
- e) All of the above

Pop Quiz!

As long as you consult with one or two of the listed stakeholders, you have met the requirements related to submitting your consolidated application.

a) True

b) False

Pop Quiz!

Which stakeholders must you consult with before completing and submitting your consolidated application?

- a) Teachers, principals, and other school leaders
- b) Specialized instructional support personnel
- c) Third-party curriculum consultants
- d) A & B only
- e) A & C only

Pop Quiz!

So long as I believe nothing has changed, if I completed a needs assessment within the last five years, I do not have to do a new one before submitting my consolidated application?

a) True

b) False

Pop Quiz!

I do not have to complete each section of my consolidated application, so long as:

- a) I am consolidating all of my Title funds
- b) If I am transferring all of my funding out of one program, I don't have to complete the section for that program
- c) None of the above, I always have to complete each required section of the application

Getting Started

Creating program budgets and plans must start with requirements of the programs:

- Program and general assurances
- Title I-A
- Title II-A
- Title III-A
- Title IV-A

The specific requirements of each Title/program should directly inform an LEA's budget and plan.

Coordinating with Other Programs

LEA must coordinate with other programs regarding funding of activities to avoid duplication of efforts, and this should be reflected in the budget/app narrative. (Sec. 1112(a)(1)(B))

Programs to coordinate with (not an exhaustive list):

- IDEA
- WIOA (adult ed and vocational rehabilitation)
- Perkins (CTE is now part of a “well-rounded education”)
- McKinney-Vento
- Head Start

Coordination should include braiding of federal funds

Title I-A: Basic LEA Plan Requirements

Local Educational Agency (LEA) must have an approved plan on file with OSSE to receive ESSA funding (Sec. 1112(a)(1))

Plan must be developed with “timely and meaningful consultation” with:

- Teachers, principals, and other schools leaders (such as Deans, Chief Accountability Officers, etc.)
- Paraprofessionals
- Specialized instructional support personnel (such as behavioral specialists, school counselors, social workers, etc.)
- Charter school leaders (if applicable)
- Administrators (CEOs, Curriculum Directors, Program Managers, etc.)
- Other “appropriate school personnel”
- Parents

Sec. 1112(a)(1)(A)

Title I-A Descriptions

Plan must describe how LEA will monitor student progress in meeting challenging State academic standards by:

- Developing & implementing “well-rounded education.”
- Identifying students at-risk of failure
- Providing additional **educational** assistance to individual students that need help meeting standards
- Identifying & implementing instructional and other strategies to strengthen academic programs and improve conditions for learning

(Sec. 1112(b)(1))

LEA Plan – Title I: Descriptions

How the LEA will identify and address disparities that result in low-income students and minority students being taught at higher rates than other students by ineffective, inexperienced, or out-of-field teachers; (Sec. 1112(b)(2))

How LEA will carry out its responsibilities for turning around schools identified for comprehensive and targeted support; (Sec. 1112(b)(3))

What poverty criteria the LEA is using to select school attendance areas under Sec. 1113 (DCPS Only); (Sec. 1112(b)(4))

In general, the nature of the programs to be conducted by schoolwide & targeted assistance schools and, where appropriate (for DCPS Only), educational services outside such schools for children living in local institutions for neglected or delinquent children, and for neglected and delinquent children in community day school programs; (Sec. 1112(b)(5))

Local App: Descriptions (cont.)

Services the LEA will provide homeless children and youths to support the enrollment, attendance, and success of homeless children and youths, in coordination with the services the LEA is providing under the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11301 et seq.); (Sec. 1112(b)(6))

LEA strategy for implementing effective parent and family engagement under Sec. 1116, as applicable; (Sec. 1112(b)(7))

If applicable, how the LEA will support, coordinate, and integrate services provided under this part with early childhood education programs at the LEA or individual school level, including plans for the transition of participants in such programs to local elementary school programs; (Sec. 1112(b)(8))

Title I-A Descriptions (cont.)

How TAS teachers and school leaders, in consultation with parents, administrators, paraprofessionals, and specialized instructional support personnel, will identify the eligible children most in need of services under this part; (Sec. 1112(b)(9))

How the LEA will implement strategies to facilitate effective transitions for students from middle grades to high school and from high school to postsecondary education including, if applicable—

- (A) through coordination with institutions of higher education (IHEs), employers, and other local partners; and
- (B) through increased student access to early college high school or dual or concurrent enrollment opportunities, or career counseling to identify student interests and skills; (Sec. 1112(b)(10))

How the LEA will support efforts to reduce the overuse of discipline practices that remove students from the classroom; (Sec. 1112(b)(11))

Title I-A Descriptions (cont.)

How the LEA, if applicable, will support programs that coordinate and integrate—

- (A) academic and CTE content through coordinated instructional strategies, that may incorporate experiential learning opportunities and promote skills attainment important to in-demand occupations or industries in the State; and
- (B) work-based learning opportunities that provide students in-depth interaction with industry professionals and, if appropriate, academic credit; (Sec. 1112(b)(12))

Any other information on how the LEA proposes to use funds to meet the purposes of this part, and that the LEA determines appropriate to provide, including how the LEA will:

- (A) assist schools in identifying and serving gifted and talented students; and
- (B) assist schools in developing effective school library programs to provide students an opportunity to develop digital literacy skills and improve academic achievement. (Sec. 1112(b)(13))

Title I-A: Schoolwide Needs Assessment

Assessment of the entire school that takes into account information on the academic achievement of children in relation to the challenging State academic standards, particularly the needs of those children who are failing, or are at-risk of failing, to meet the challenging State academic standards and any other factors as determined by the LEA.
(Sec. 1114(b)(6))

More on this later

LEA Plan - Title II

LEA must:

- Meaningfully consult with teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders (if applicable), parents, community partners, and other relevant organizations or partners;
- Seek advice from the individuals and organizations described above regarding how best to improve the LEA's activities to meet the purpose of this title; and
- Coordinate the LEA's activities under this part with other related strategies, programs, and activities being conducted in the community.

(Sec. 2102(b)(3))

Title II-A: LEA Plan requirements

Description of the activities to be carried out by the LEA under this section and how these activities will be aligned with challenging State academic standards. (Sec. 2102(b)(2)(A))

Description of the LEA's systems of professional growth and improvement, such as induction for teachers, principals, or other school leaders and opportunities for building the capacity of teachers and opportunities to develop meaningful teacher leadership. (Sec. 2102(b)(2)(B))

Description of how the LEA will prioritize funds to schools served by the agency that are implementing comprehensive support & improvement activities and targeted support and improvement activities and have the highest percentage of children counted for Title I purposes. (Sec. 2102(b)(2)(C))

Title II-A Requirements (cont.)

How the LEA will use data and ongoing consultation to continually update and improve activities supported under this part. (Sec. 2102(b)(2)(D))

An assurance that the LEA will coordinate professional development activities authorized under this part with professional development activities provided through other federal, State, and local programs. (Sec. 2102(b)(2)(F))

Title III-A Consultation & Coordination

Eligible entity seeking to receive Title III-A funds will:

- Consult with teachers, researchers, school administrators, parents and family members, community members, public or private entities, and institutions of higher education, in developing and implementing such plan (Sec. 3116(b)(4)(C)); and
- If applicable, coordinate activities and share relevant data under the plan with local Head Start and Early Head Start agencies, including migrant and seasonal Head Start agencies, and other early childhood education providers (Sec. 3116(b)(4)(D)).

LEA Plan - Title III Requirements

Describe the effective programs and activities, including language instruction, to be developed, implemented, and administered under the subgrant that will help English learners (ELs) increase their English language proficiency and meet the challenging State academic standards. (Sec. 3116(b)(1))

Describe how the eligible entity will ensure that elementary schools and secondary schools receiving funds under this subpart assist ELs in—

- Achieving English proficiency based on the State's English language proficiency assessment, consistent with the State's long-term goals; and
- Meeting the challenging State academic standards. (Sec. 3116(b)(2))

Describe how the eligible entity will promote parent, family, and community engagement in the education of ELs. (Sec. 3116(b)(3))

Title IV-A Needs Assessment

In order to receive ESSA Title IV-A funds, LEAs that receive \$30,000 or more must conduct a comprehensive needs assessment once every three years (Sec. 4106(d)).

Assessment must examine needs for improvement of—

- Access to, and opportunities for, a well-rounded education for all students;
- School conditions for student learning in order to create a healthy and safe school environment; and
- Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.

(Sec. 4106(d)(1))

Title IV-A Consultation

Sec. 4106(c): Eligible recipient must develop its application through consultation with:

- Parents;
- Teachers, principals, other school leaders;
- Specialized instructional support personnel;
- Students;
- Community-based organizations;
- Local government representatives;
- Charter school teachers, principals, and other school leaders (if applicable); and
- Others with relevant and demonstrated expertise in programs and activities designed to meet the purpose of this subpart.

Consultation must be ongoing

LEA Plan - Title IV Descriptions

Any partnership with an institution of higher education, business, nonprofit organization, community-based organization, or other public or private entity with a demonstrated record of success in implementing activities under this subpart. (Sec. 4106(e)(1)(A))

If applicable:

- How funds will be used for activities related to supporting well-rounded education.
- How funds will be used for activities related to supporting safe and healthy students.
- How funds will be used for activities related to supporting the effective use of technology. (Sec. 4106(e)(1)(B)-(D))

The program objectives and intended outcomes for activities under this subpart, and how the eligible applicant will periodically evaluate the effectiveness of the activities carried out under this section based on such objectives and outcomes. (Sec. 4106(e)(1)(E))

Evaluation of Title IV Activities – at least every three years

Stakeholder Engagement – All Titles

Title I: teachers, principals, and other schools leaders; paraprofessionals; specialized instructional support personnel (SISP); charter school leaders (if applicable); parents; administrators; and other “appropriate school personnel.”

Title II: teachers, principals, other school leaders; paraprofessionals; SISP; charter school leaders; parents; community partners; and other relevant organizations or partners.

Title III: teachers; researchers; school administrators; parents and family members; community members; public or private entities; institutions of higher education; and (if applicable) local Head Start and Early Head Start agencies, including migrant and seasonal Head Start agencies, and other early childhood education providers

Title IV: parents; teachers, principals, other school leaders; SISP; students; community-based organizations; local government representatives; charter school teachers, principals, and other school leaders (if applicable); and others with relevant and demonstrated expertise in programs and activities designed to meet the purpose of this subpart.

Transferability vs. Consolidation

Pop Quiz!

What is the maximum amount of Title III funds I can transfer into other Titles under Sec. 5103 of ESSA?

- a) 50% of my allocation
- b) Any amount I deem necessary and reasonable
- c) The amount determined by my needs assessment
- d) None of the above

Pop Quiz!

If I consolidate my Title funds into a “schoolwide” pot of funds, the plan only needs to focus on the intents and purposes of which program?

- a) Title I-A, because it is the largest program
- b) Title III-A, because there are civil right requirements to worry about
- c) All program intents and purposes should be reflected in my schoolwide plan
- d) None of the above

Pop Quiz!

If I transfer all of my Title IV-A funds into Title II-A, I must still ensure that I am spending some of the funds on a well-rounded education, safe and healthy schools, and technology integration:

a) True

b) False

Pop Quiz!

When deciding to consolidate or transfer my title funds, what factors do I need to consider

- a) Stakeholder advice
- b) The results of my needs assessment
- c) The best way to achieve the intents and purposes of all of my Title programs
- d) All of the above

Loss of Identity

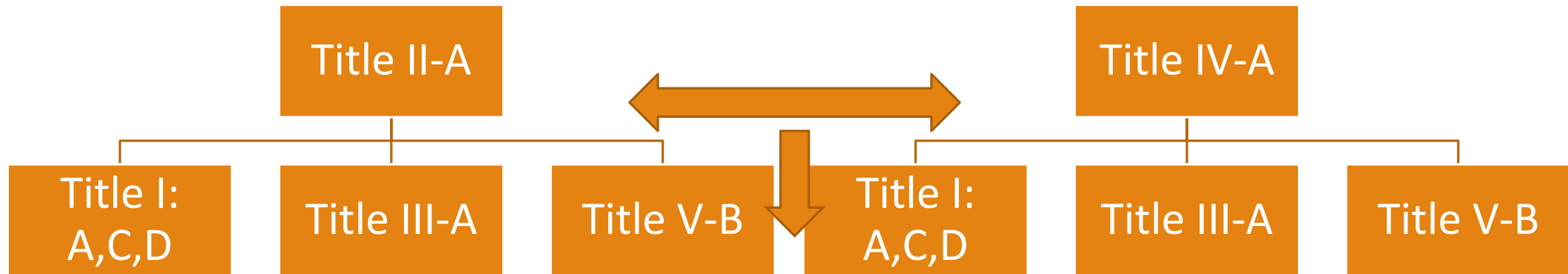
Transferability: transferred funds lose their original federal identity and now assume the identity of the program receiving the transfer

- Example: Title II-A funds transferred to Title I-A
- Title II-A funds being transferred lose their identity as Title II funds, and are now considered Title I-A funds.
- See U-4 of 2016 Non-Regulatory Guidance:
<https://www2.ed.gov/policy/elsec/leg/essa/essaguidance160477.pdf>

Consolidation: All consolidated funds lose their identity

- Example: Title I-A and Title II-A funds are consolidated in a schoolwide school.
- Both sets of funds lose their identity, are now simply schoolwide funds

Transferability – Sec. 5103



Intents & Purposes

Transferability (Sec. 5103(e)): Transferred funds are subject to the rules and requirements of the program to which they are transferred.

Consolidation: While specific rules of consolidated programs may not be specifically applied, the intent and purposes of all consolidated programs must be met (Sec. 1114(a)(3)(A)).

Set-aside Considerations

Transferability: SEA/LEA must conduct consultations in accordance with section 8501, if such transfer of funds comes from a program that provides for the participation of students, teachers, or other educational personnel, from private schools.

- Consultation would include all applicable set-asides (per C-33 of 2019 Equitable Services Non-Regulatory Guidance:
<https://www2.ed.gov/policy/elsec/leg/essa/drafteseatitleiequitableservices.pdf>)

Consolidation: Not applicable

- Schoolwide: no school-level set-asides
- Admin: only consolidating set-aside funds
- Single-school LEAs...applicable set-sides before consolidation

Use of Funds

Transferability: allowable use under program that funds were transferred into (Sec. 5103(e)(1))

Schoolwide Consolidation: Allowable activity under the approved schoolwide plan (Sec. 1114(b))

Consolidated Admin: administration of the programs and for uses, at the school district and school levels, including:

- Coordination of consolidated programs with other federal and non-federal programs;
- Administration and technical assistance; and
- Implementation of fiscal support teams that provide technical fiscal support assistance, which shall include evaluating fiscal, administrative, and staffing functions, and any other key operational function.

(Sec. 8203(d))

LEA Responsibility

The LEA is responsible for ensuring funds are used properly and proper accounting is maintained, regardless of any third-party contractors.

If any noncompliance is found, the LEA (not the contractor) will be held responsible.

Schoolwide Plans

SEC. 1114 OF ESEA

Pop Quiz!

If I consolidate all of my Title funds into a schoolwide pot, and I work exclusively with English learners and homeless students, I must track my time & effort by which cost objectives?

- a) Title I-A
- b) Title III-A
- c) Schoolwide
- d) What is a cost objective?

The Schoolwide Plan

In order to be allowable, consolidated funds must be in line with the approved schoolwide plan, depending on the level of consolidation.

If appropriate and applicable, the plan should be developed in coordination and integration with other federal, State, and local services, resources, and programs, such as:

- Other ESEA programs,
- Violence prevention programs,
- Nutrition programs,
- Housing programs,
- Head Start programs,
- Adult education and CTE programs,
- Schools implementing comprehensive support and improvement activities or targeted support and improvement activities.

(Sec. 1114(b)(5))

Importance of Schoolwide Plan

Provides information to auditors and monitors about which programs are included if there is a consolidation.

Auditors will hold the school accountable in accordance with whether:

- The plan's activities meet the intent and purposes of the consolidated federal programs;
- The school is implementing the activities detailed in the plan.

Depending on the level of consolidation, the LEA may attribute expenditures to particular fund sources without regard to whether they actually support particular fund source as long as the expenditures support the schoolwide plan.

Schoolwide Plan Consultation

Plan must be developed with the involvement of parents and other members of the community to be served and individuals who will carry out such plan, including:

- Teachers, principals, other school leaders, paraprofessionals present in the school;
- Administrators (including administrators of programs described in other parts of this title);
- The LEA;
- To the extent feasible, tribes and tribal organizations present in the community;
- If appropriate, specialized instructional support personnel and technical assistance providers;
- School staff;
- If the plan relates to a secondary school, students; and
- Other individuals determined by the school.

(Sec. 1114(b)(2))

Needs Assessment

Assessment of the entire school that takes into account information on the academic achievement of children in relation to the challenging State academic standards, particularly the needs of those children who are failing, or are at-risk of failing, to meet the challenging State academic standards and any other factors as determined by the LEA. (Sec. 1114(b)(6))

The plan should be monitored and revised on an annual basis based on the needs assessment (which will be ongoing)

ED 2016 Schoolwide Guidance: Where necessary, a school should attempt to engage in interviews, focus groups, or surveys, as well as review data on students, educators, and schools to gain a better understanding of the root causes of the identified needs.

- <https://www2.ed.gov/policy/elsec/leg/essa/essaswpguidance9192016.pdf>

Using Flexibility

In designing and implementing the schoolwide plan, a school must implement strategies that:

- Provide opportunities for all children to meet challenging State academic standards;
- Use methods and instructional strategies that strengthen the academic program in the school, increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum, which may include programs, activities, and courses necessary to provide a well-rounded education; and
- Address the needs of all students, but particularly those at risk of not meeting challenging State academic standards.

(Sec. 1114(b)(7))

Examples of Use of Schoolwide Funds

- High-quality preschool or full-day kindergarten and services to facilitate the transition from early learning to elementary education programs.
- Recruitment and retention of effective teachers, particularly in high-need subjects.
- Instructional coaches to provide high-quality, school-based professional development.
- Increased learning time.
- Evidence-based strategies to accelerate the acquisition of content knowledge for English learners.
- Activities designed to increase access and prepare students for success in high-quality advanced coursework to earn postsecondary credit while in high school.
- CTE programs to prepare students for postsecondary education and the workforce

More Examples

- Counseling, school-based mental health programs, mentoring services, and other strategies to improve students' nonacademic skills.
- School climate interventions (e.g., anti-bullying strategies, positive behavior interventions and supports).
- Equipment, materials, and training needed to compile and analyze student achievement data to monitor progress, alert the school to struggling students, and drive decision making.
- Response-to-intervention strategies intended to allow for early identification of students with learning or behavioral needs and to provide a tiered response based on those needs.

Even More Examples

- Activities that have been shown to be effective at increasing family and community engagement in the school, including family literacy programs.
- Devices and software for students to access digital learning materials and collaborate with peers, and related training for educators (including accessible devices and software needed by students with disabilities).
- Two-generation approaches that consider the needs of both vulnerable children and parents, together, in the design and delivery of services and programs to support improved economic, educational, health, safety, and other outcomes that address the issues of intergenerational poverty.

Schoolwide Consolidation

LEA may consolidate and use funds under Title I-A, together with other Federal, State, and local funds, in order to upgrade the entire educational program of an eligible school.

Available for consolidation:

- Title I-A
- Title II-A
- Title III-A
- Title IV-A

Schoolwide Consolidation Benefits

Consolidation schoolwide funds from any other noncompetitive formula grant program administered by ED are exempt from statutory or regulatory provisions.

- Does not relieve a schoolwide school of requirements relating to:
 - Health,
 - Safety,
 - Civil rights,
 - Student and parental participation and involvement,
 - Services to private school children,
 - Comparability of services,
 - Maintenance of effort,
 - Non-supplant methodology under Sec. 1118(b)(2)
(Sec. 1114(a)(3)(B))

Not required to maintain separate fiscal accounting records (so long as documentation maintain that intents and purposes of each program are met)

(Sec. 1114(a)(3)(C))

What does “Consolidation” mean?

Lose their individual identity and treated like a single “pool” of funds

What does “pool” mean?

- Not required to combine funds in a single account or “pool” with its own accounting code
- Used figuratively to convey the idea that a schoolwide program has the use of all consolidated funds to support schoolwide program

Guidance: Accounting for Consolidated Funds

Generally, the LEA accounts for all expenditures under the schoolwide plan as expenditures from the consolidated pool.

LEA may attribute expenditures to particular fund sources without regard to whether they actually support the particular fund source.

- As long as expenditures support the schoolwide plan.
- Depends on level of consolidation.

But LEAs must still demonstrate that consolidated funds have been expended.

May use any reasonable method, but there are at least three options approved by ED.

<https://www2.ed.gov/policy/elsec/leg/essa/essaswpguidance9192016.pdf>

Reporting with Schoolwide Consolidation

Proportional Basis (or “any other reasonable method”)

- Use for identifying:
 - Carryover
 - Amount of unused non-federal funding
 - MOE
 - Comparability
 - Reporting expenditures back to State or USDE
 - State Per Pupil Expenditure (SPPE)

<https://www2.ed.gov/policy/elsec/leg/essa/essaswpguidance9192016.pdf>

Time & Effort for Schoolwide Consolidation

- Consolidating Titles I-IV
- Time and Effort still required for all staff paid with schoolwide funds
- Schoolwide is considered a single cost objective: semiannual certification
- If an employee works on a non-consolidated program, PARs could still be required

Takeaways

Item	Staff Responsible
Begin discussions regarding who in your organization needs to weigh in on a decision to consolidate or transfer funds	COO, Senior Finance Lead, Grant Manager and Program Manager
<p>Be aware of the following:</p> <ul style="list-style-type: none">• Consolidating ESEA Title funds could simplify your grant management but also requires an investment of planning upfront.• Minimum and timely drawdowns of each Title allocation still need to be met, including the Title I maximum 15% carryover limitation requirement, which is applied against the Title I allocation amount• Consolidating may have implications for the single audit and monitoring	COO, Senior Finance Lead, Grant Manager and Program Manager

Takeaways (con't.)

Item	Staff Responsible
Do results of school's needs assessment indicate a benefit to consolidating the title programs?	COO, Senior Finance Lead, Grant Manager and Program Manager
<p>Questions to consider for consolidating funds:</p> <ul style="list-style-type: none">• Do we have staff and/or programs that are already doing work on more than one Title program so it may sense to consolidate?• Is there a program area your LEA has been wanting to fund, but has not had the right Title grant to do it with, but meets the purposes and requirements of another Title grant?• Would this streamline your accounting?• How would this affect your single audit/SEFA, etc.?• What new processes will have to be built into the program to document compliance in preparation for monitoring?	COO, Senior Finance Lead, Grant Manager and Program Manager

Takeaways (con't.)

Item	Staff Responsible
<p>Questions to consider for transferring:</p> <ul style="list-style-type: none">• Do we have staff and/or programs that are underfunded by one Title and would benefit from a higher allocation?• Do the conclusions of the needs assessment(s) show a high need for the purposes of one Title and a low need for the purposes of another Title?• How would this affect your single audit/SEFA, etc.?• How can this decision be documented?	<p>COO, Senior Finance Lead, Grant Manager and Program Manager</p>

Next Steps...

- Analyze the results of your needs assessment(s) to determine how the program will raise achievement, or ways in which it already has
- Gather your team to align program costs with purposes of the Title allocations received
 - Ensure that expenditures reflect your approved budget and items in your Conn App
- Make decisions to consolidate or transfer or leave allocations as-is in order to fund programs with maximized budgets
 - Make sure these topics are included in your equitable services consultation
- Put in place the processes and role responsibilities that will document program implementation and expenditures in anticipation of monitoring
 - Be prepared to review and update, as needed

Closing

❖ Questions?

❖ Survey

❖ Contact information:

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