

CCSSO Decision Guide for Implementing ESSA: State Considerations for Effective Grant Programs

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Introduction

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www.CCSSO.org/ESSA:

Federal Funds Toolkit

Maximizing ESSA Formula Funds for Students

Summary of Significant ESSA Spending Rules

Agenda

- Introduction to new Decision Guide
- Overview of Guide's content and format
- Using the Guide to connect ESSA implementation to program delivery
- Questions

- (time permitting) Walkthrough: implementing changes to Title I schoolwide programs

Overview and Scope

- New resource to help SEAs navigate ESSA implementation:
 - *Decision Guide for Implementing ESSA: State Considerations for Effective Grant Programs:*
<http://www.ccsso.org/Documents/2016/ESSA/CCSSODecisionGuideForESSAImplementation.pdf>
- Decision guide highlights some of the most significant non-accountability changes affecting:
 - Title I, including School Improvement, Direct Student Services, and the Part A program,
 - Title II, Part A,
 - Title IV, Part A, and
 - Cross-cutting provisions (such as transferability, equitable services).

Builds on prior tool . . .

- *Maximizing ESSA Formula Funds for Students: State Readiness Self Assessment:*
<http://www.ccsso.org/Documents/2016/ESSA/MaximizingESSAFormulaFundsforStudentsApril2016.pdf>

Goals

- Clarify major changes that affect implementation.
- Help SEAs to:
 - Identify connections between spending rules and program delivery,
 - Identify connections between state administrative processes and program delivery, and
 - Understand how ESSA changes affect SEA capacity.

Decision Guide Overview

Content and Format

Content of Decision Guide

- Guide takes a deeper dive into non-accountability changes, including:
 - Changes to the way certain grants are distributed to states, districts and schools,
 - New program design options (that is, new options for the kinds of services states and districts can deliver under ESSA),
 - New spending options and requirements,
 - New planning requirements, and
 - New reporting requirements on spending.

Format of Decision Guide

- Describes significant changes to the law, and
- Poses implementation considerations.
 - These are questions SEAs might consider as they think through what changes will be needed to their policies, procedures, practices, organizational structure, and staff roles and responsibilities.

Example: Ranking and Serving

- Describes changes to Title I, Part A's ranking and serving requirement that could make it easier for high schools to be served with Title I funds.
- Implementation Considerations:
 - What changes will the SEA need to make to its application process so LEAs can exercise these new options?
 - What guidance and technical assistance will the SEA develop to make LEAs aware of the new options?
 - Does the SEA wish to frame this as a school improvement issue?
 - And more . . .

Example: Ranking and Serving

SEA Oversight of Ranking and Serving

What changes will the SEA need to make to its application process so LEAs can exercise these new options?

Many SEAs require LEAs to show how they ranked and served schools in the local-to-state application for Title I funds and will have to change the application to reflect the new options.

Questions to consider include:

- Does the existing local-to-state application require LEAs to serve schools in strict rank order (with no option to serve a lower ranked school before a higher ranked school)? If so, what modifications can be made to ensure LEAs can use the new option to serve high schools with at least 50% poverty before higher poverty elementary and middle schools, if they so choose?
- Does the SEA prepopulate poverty data in the application? If so, what modifications can be made to permit LEAs to use alternate data if they exercise the feeder pattern option described above?
- If the SEA uses an online application, what technology changes are needed to reflect the new ranking and serving options, and how far in advance of the 2017-2018 grant year must those changes be made to accommodate the application's timely release?

Issues Covered

Title I School Improvement Set-Aside: Section 1003

- Transitioning from SIG
- Distributing Section 1003 Funds
- Evidence-Based Requirement
- Reporting

Direct Student Services: Section 1003A

- Deciding Whether to Reserve Funds for Direct Student Services
- Implementing the Program

Title I, Part A

- Overseeing Local Compliance with Set-Aside Requirements
- Fulfilling SEA Responsibilities for Equitable Services in Title I, Part A
- SEA Oversight of Ranking and Serving
- Connecting Ranking and Serving to School Support and Improvement
- Title I Spending to Support School Quality and Well-Rounded Education
- SEA Role in School Support and Improvement
- Changing SEA Policies to Reflect New Schoolwide Options
- Impact of SNS Changes on State Title I Spending Policies for Title I
- SEA Oversight of SNS Compliance
- SEA Support to LEAs on Reporting Requirements
- SEA Procedures on Spending Data

Issues Covered (cont.)

Title II, Part A

- Adjusting to New Title II Allocation Levels
- Deciding Whether to Reserve Funds
- SEA Role in Overseeing New Set-Aside Calculations
- Spending State-Level Funds
- SEA Role in Supporting Effective Local-Level Spending
- Managing Reporting Requirements

New Title IV, Part A Program

- Managing Title IV, Part A Allocations
- State-Level Spending
- Managing Reporting Requirements

Issues that Apply to Multiple ESSA Programs

- Adjusting Maintenance of Effort Procedures
- Implementing Transferability Options
- Fulfilling SEA Responsibilities for Equitable Services

Using the Decision Guide

Making connections between ESSA implementation and program delivery

Connections Between Spending Rules and Program Delivery

Example:

- Secondary school access to Title I (via ranking and serving changes) could connect to school improvement for CSI/TSI schools.

SEA may need to: Ensure coordination between Title I and school improvement staff for policy making and oversight.

Examples:

- Title II, Part A formula changed, which will have immediate impact on the amount of money LEAs receive.
- Spending Title II, Part A on class size reduction and personalized PD only permissible if evidence-based to the extent the State in consultation with LEAs determines evidence is reasonably available.

SEA may need to: Ensure coordination between teaching and learning staff, grants staff, fiscal office, and communications staff. Retool allocation charts, change rubrics, etc.

Connections Between State Administrative Processes and Program Delivery

Example:

- ESSA clarifies the broad range of services Title I schools can offer to students to provide a well-rounded education, including non-academic supports.
- ESSA changes schoolwide planning requirements.

SEAs may need to: Change LEA-to-SEA application and budget tools, update guidance documents and templates (if used), adjust change monitoring protocols.

SEA Capacity Considerations

Example:

- New SEA requirements for direct involvement CSI school planning.
- New evidence-based requirements for Section 1003 funds.
- New state-level equitable services requirement.

SEAs may need to: Have existing staff take on new responsibilities, and/or obtain additional expertise (via new staff hires, contractors, etc.).

Questions?

Walkthrough

Implementing ESSA changes to Title I schoolwide programs

Changing SEA Policies to Reflect New Schoolwide Options

What changes does the SEA need to make to its schoolwide planning policies or practices to reflect ESSA requirements?

SEAs may wish to change the way they oversee and enforce schoolwide planning requirements to ensure schools can carry out the full range of activities ESSA permits.

Questions to consider include:

- What changes should be made to state guidance documents, state monitoring instruments, or SEA-developed schoolwide plan templates (if a state uses such templates, which is not required) to ensure they:
 - o Reflect ESSA's revised schoolwide plan requirements, and
 - o Allow schools to use the full range of strategies permitted by federal law?
- Can the SEA incorporate schoolwide planning requirements into other state-required school level plans so schools will not have to complete multiple plans?
- If incorporating schoolwide plans into other plans is not possible, how can the SEA encourage schools to align schoolwide plans with other plans they must complete (such as CSI/TSI plans, school plans required by state law, and/or other locally-required school plans)?

What changes to state spending policies does the SEA need to make to ensure alignment with ESSA's schoolwide spending options?

Under NCLB, some states limited Title I spending in schoolwide schools beyond what federal law required, for example:

- Limiting the students who could participate in Title I-funded activities (even though Title I considers all students to be "Title I students" in a schoolwide school),
- Limiting Title I to remedial services (even though Title I fund could be spent on advanced coursework),
- Limiting Title I to reading and math programs (even though Title I could support a wider range of subjects), and
- Forbidding local spending on non-instructional supports such as counselors, mentoring, or other non-academic supports (even though Title I could be used for such services).⁶⁴

ESSA makes clear these restrictions are not required by federal law, and encourages schoolwide programs to provide a wide range of instructional and non-instructional services and supports for students consistent with their needs.

To ensure state spending policies are consistent with ESSA, questions to consider include:

- How will the SEA update its state guidance and technical assistance on schoolwide programs?
- How will the SEA update the state application and approval process for Title I funds to ensure expanded schoolwide spending options are available to schools?
- How will the SEA update state monitoring and other oversight tools used to review school spending?
- How will the SEA ensure the documents and activities described above are aligned with each other and consistent with state policy objectives?

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For additional support

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