

# Federal Programs Overview



**NONPUBLIC SCHOOLS CONSULTATION  
MEETING 3/29/12**

# NCLB Federal Programs Snapshot



- Funding Source—**All US Taxpayers**
- US Department of Education—Makes ESEA (Elementary and Secondary Education Act) funds available to states who then redistribute to Local Educational Authorities (LEAs; in our case, Orleans Parish School Board)
- The LEA is ultimately responsible for the proper use and oversight of these taxpayer funds
- The LEA may be monitored or audited by state or federal officials at any time to ensure proper use and oversight
- Third-party providers provide **service**, not funds, as contracted by the LEA



## **Building Your Title Program**

Supplement, not  
Supplant

Means you cannot use federal funds to perform functions that, if federal funding were taken away, you would perform yourself.

Home additions allow you to better serve your students, but without the addition, you could still serve them on your own.

- **Building Your Title Program...**  
Let's use building an addition as a metaphor





## **Role of the nonpublic school**

Determine your students' and teachers' needs

Must use parental input, teacher input, student performance measures, student counts, etc., to determine what your needs are

Remember, all decisions should be based on serving the children

- To build the addition, first you need to know what you want!





## Role of the LEA

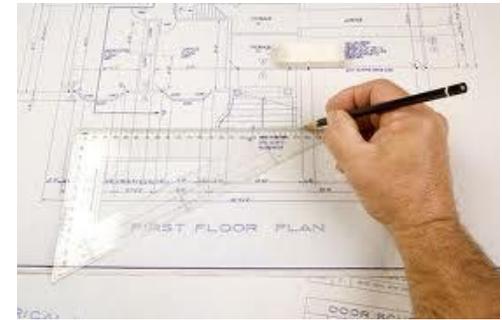
### Banker, City Hall, Architect, Inspector

Provide funding for your plans based on LEA allocation and student counts

Provide advice and consultation on whether your needs are **reasonable, necessary, and allocable** according to regulations

Provide permits to begin work, and inspections as the work is progressing to ensure the bank (USDOE) will continue funding the work

- Now that you know what you want, you need money, blueprints, permits and inspections





## Role of the Third Party Provider

Deliver services to eligible children and/or teachers

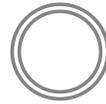
Make arrangements for professional development if not provided by them (hire subcontractors)

Third party providers cannot make changes to the blueprints (your Title plans) or give you funding decisions.

- Third Party Provider does the work



# What if you want changes after work has started?



No problem! Just make sure there is money to do so (LEA), that the changes are allowable (LEA), revise your plan (NP and LEA), and let the contractor know



**We must all work TOGETHER to deliver the best services possible for the children!**

# **Title I Review**



**DEFINITIONS, ALLOCABLE COSTS, EXAMPLES**

# Title I Purpose



- The purpose of this title is to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging State academic achievement standards and state academic assessments.\*
- The primary goal is closing the achievement gap between high- and low-performing children, especially the achievement gaps between minority and nonminority students, and between disadvantaged children and their more advantaged peers.
- Costs must be necessary, reasonable, and allocable.

*\*U.S. Department of Education Information on Title I: Improving the Academic Achievement of the Disadvantaged. [www2.ed.gov/policy/elsec](http://www2.ed.gov/policy/elsec)*

# Title I, Continued



- The objective of Title I can be achieved by the following:
  - Instructional Services
    - ✦ Pull-out services
    - ✦ After school
    - ✦ Summer school
    - ✦ Saturday classes
    - ✦ Computer-assisted instruction
  - Counseling Services
  - Instructional Materials
  - Parental Involvement (At least 1% of allocation)
  - Professional Development (At least 5% of allocation)
    - ✦ Professional development activities funded by Title I **must** be directly tied to improving achievement of Title I students

# How do I plan for Title I services without supplanting?



Example: You have students at risk of failing math in grade 4.

- **Supplanting**: Using Title I funds to hire a replacement 4<sup>th</sup> grade classroom teacher with better math instruction skills
- **Supplementing**: Using Title I funds for math tutoring and additional math instruction after school or on Saturdays
- **Supplementing**: Using Title I funds to purchase math materials for after school tutoring use
- **Supplementing**: Using Title I funds to provide professional development in math instruction to 4<sup>th</sup> grade teacher

# How do I plan for Title I services without supplanting (cont'd)?



Example: Lowest-achieving students show need for additional parental involvement.

- **Supplanting**: Using Title I funds to pay for a portion of your school's fall fair fundraiser.
- **Supplementing**: Using Title I funds to host an open house for parents of summer school/Title I students.
- **Supplementing**: Using Title I funds to host a LEAP/GEE parental information session

# How is Title I eligibility determined?



- Private school children who reside in Title I participating public school attendance areas AND are failing or most at risk of failing to meet student academic achievement standards
- Use of eligibility criteria sheets developed by OPSB. These sheets include areas for parental recommendation, teacher recommendation, and standardized test scores
- Poverty is NOT a criterion!

# Building Your Title I Plan



- Evaluate current plan. What's working? What isn't? Are your students progressing?
- Determine student needs in **core curriculum** (standardized testing, teacher recommendations, classroom grades)
- Estimate budgeted allocation at 80% of current amount
- Create plan based on student needs, desired changes/additions/deletions of current plans, and projected allocation (80% of current allocation)
- Submit to OPSB for review and approval by June 15, 2012

# **Title II Review**



**DEFINITIONS, ALLOCABLE COSTS, EXAMPLES**

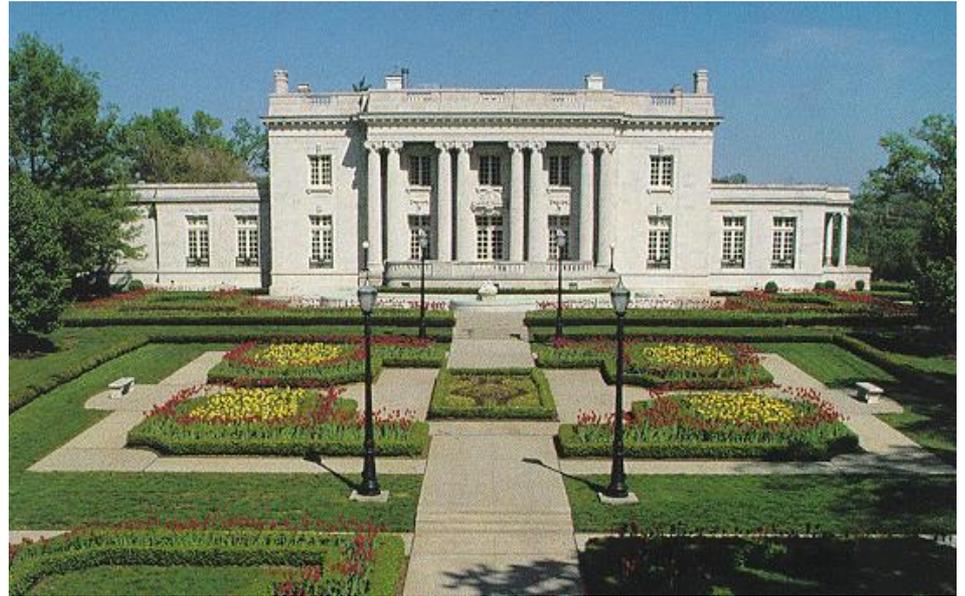
# Title II Purpose



- The purpose of Title II, Part A is to increase the academic achievement of all students by helping schools and districts improve teacher and principal quality and ensure that all teachers are highly qualified.\*
- Costs must be necessary, reasonable, and allocable.

*\*Improving Teacher Quality State Grants, ESEA Title II, Part A, Non-Regulatory Guidance, p. 2.*

# Keep in mind the approved plan when making any spending decisions



**This is what was approved by the bank as reasonable, necessary, and allocable**

**Not this!**

# What makes a cost necessary, reasonable, and allocable?



- **Necessary**—Necessary to the performance of the federal award
- **Example:** Professional development in biology is an identified need in your school. It is ***necessary*** to participate in PD for biology instruction to improve your students' achievement.
- It is ***NOT necessary*** to attend PD in San Diego if comparable PD is available in Baton Rouge.

# What makes a cost necessary, reasonable, and allocable?



- **Reasonable**—A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost
- **Example:** If travel to San Diego is *necessary*, then a prudent person would deem it **reasonable** to book economy class airfare at least two weeks in advance
- A prudent person would **NOT** deem it reasonable to book first class tickets, stay in a first class hotel, or book higher-priced travel at the last minute, when there are **comparable, lower-cost alternatives available**

# What makes a cost necessary, reasonable, and allocable?



- **Allocable**—A cost is allocable...if the goods or services involved are chargeable or assignable to that cost objective...(allowable under that grant)
- **Example:** You have determined it is *necessary* to attend PD in San Diego, and you are using *reasonable* travel methods to get there.
- It is ***not allocable*** to attend PD for improving religious education, subjects not related to core curriculum for student achievement, etc.

**“Our top story tonight: Local school official uses taxpayer dollars for an all-expenses paid trip to this luxury beach resort! Details up next!”**



**Do you want to walk out of your office to this????**



# Travel



- **Hotels**

- Use group or conference rates whenever possible (all attendees)
- See Louisiana PPM 49 for guidance

Louisiana PPM49 is updated annually and can be downloaded at <http://www.doa.louisiana.gov/osp/travel/travelpolicy/2011-12pocketguide.pdf>

- **Car Rental**

- Generally not reasonable or necessary (use airport shuttle to hotel and back). When attending a conference participants should stay at a reasonably priced hotel within walking distance of the conference hotel, if the conference hotel is not available or is not reasonably priced

# Faculty Retreats



- **Not allowable:** planning, professional development, etc., can all be performed locally

Suggested Alternative: Bring Speaker to New Orleans and deliver PD on site at school or rent local conference room

**Remember: Aside from it being against the law, the Bank Shareholders (Taxpayers) Don't Want Their Money Paying for This**



# Food and Refreshments



- Allowable if cost is reasonable and necessary
  - If PD lasts longer than 4 hours and is held over normal meal times

Louisiana recognizes the following reasonable cost rates for FY 2011-2012:

Refreshments--\$4.50 per person

Breakfast--\$8 per person

Lunch--\$12 per person

Dinner--\$21 per person

Louisiana PPM49 is updated annually and can be downloaded at

<http://www.doa.louisiana.gov/osp/travel/travelpolicy/2011-12pocketguide.pdf>

# Food and Refreshments



**This is reasonable.....**



**This is not!**

# Professional Development



- Must be related to identified student needs (math, reading, science, behavioral management, etc.)
- Must have specific content and agenda tied to improving student achievement.
- Must have accompanying invoice, sign-in sheet for all attendees, specific agenda, etc.
  - Generic invoice stating “Coaching” not allowable
  - “Suggested Services”: Third-party providers should not be suggesting services. It is your responsibility to determine what PD services your school needs.

# Stipends



- Allowable for professional development outside of normal school hours
  - Stipends paid for PD attended while “on the clock” at regular school pay are not allocable.
  - Stipends are not paid for PD involving travel.
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- Example: PD SUPERMATH 1 is offered at Tulane from 4pm-8pm Monday evening. Stipends are **allocable**, since teachers are working beyond the regular school day.
  - Example: PD SUPERMATH 1 is offered at Tulane from 1pm-4pm Monday afternoon during regular school schedule. Stipends are **not allocable**, since teachers are receiving pay for that day’s work.
  - Example: PD SUPERMATH 1 is offered in Houston on a Monday from 1pm-4pm. Stipends are **not allocable**, since teachers are being paid for that day’s work regardless of their location, and are being reimbursed for travel expenses.

# Conferences



- Allocable so long as the intended material is secular in nature
- If a group of schools wants to pool funds to host a conference, it must be reflected in each participating school's plan
  - Charging registration fees to attendees is allowable, but must be used to cover all costs of conference
  - Otherwise, simply pay for speakers, cost of room rental, refreshments and PD materials and DO NOT charge registration fee. Use actual costs.
  - Using registration fees, speaker fees, vendor contributions, etc., to generate a surplus or profit is absolutely **not allocable**

# Materials



- Materials purchased for professional development are to be used only for delivering content to educators
- Example: ONE license of SUPERMATH 1 is purchased to instruct *teachers* in its function.
  - Additional licenses for the use of instruction to *students* are **not allocable** costs.
- Example: Instructional poster for delivery of science content to *teachers* is allocable.
  - Additional posters for use of instruction to *students* (or to keep in classrooms) are **not allocable**.

# Education Reimbursement



- Courses for professional development allowable.
  - Example: Coursework to pursue teaching certification by private school teachers allocable.
- Religious instruction not allocable.
- Subjects not related to instruction or classroom management not allocable
  - Coursework to pursue MBA, IT degree, not allocable.

# Planning for Title II FY 2012-2013

## Fiscal



- **Use last year's allocation as a guide for budgeting;** final allocations will be delivered as soon as OPSB receives approval from the state
- A good rule of thumb is to **budget at 80% of allocation**
- Availability of funds period (for private school purposes): August 1, 2012-July 31, 2013
  - NOTE: Payment in advance of services not allowed (i.e., this year's allocation can be used in this fiscal year only)
- All information regarding federal funds available to private schools originates from the LEA. Third-party providers do not have authority to make determinations regarding carryover, amendments, etc. **Any questions about funding should be directed to OPSB.**

# Planning for Title II FY 2012-2013

## Program Requirements



- Identify core curriculum needs based on standardized test scores, student grades, or both.
- Research available existing PD opportunities (conferences, notable speakers, etc.) and associated costs.
- Discuss with other schools, OPSB, etc., options for creating/hosting local conferences if desired.
- Finalize Title II costs and complete plan.
- Submit Title II plan to OPSB (first to OCS if necessary) for review.
- Once plan is reviewed by OPSB and returned, adopt changes if necessary and implement.