

#### Welcome to Today's Webinar!

We will begin at 2:00 pm Eastern Time.

- Download the Subgranting FY 2017 Title IV-A Funds to LEAs Q&A:
   <a href="https://safesupportivelearning.ed.gov/sites/default/files/Subgranting\_FY\_2017\_Title\_IV\_A">https://safesupportivelearning.ed.gov/sites/default/files/Subgranting\_FY\_2017\_Title\_IV\_A</a>
   <a href="LEAs\_QA.pdf">LEAs\_QA.pdf</a>
- Download the original SSAE Grants Non-Regulatory Guidance: <a href="http://www2.ed.gov/policy/elsec/leg/essa/essassaegrantguid10212016.pdf">http://www2.ed.gov/policy/elsec/leg/essa/essassaegrantguid10212016.pdf</a>
- Access information on the revised ESSA consolidated state plans: <a href="https://www.ed.gov/essa?src=rn">https://www.ed.gov/essa?src=rn</a>
- Download a copy of today's presentation:
   https://safesupportivelearning.ed.gov/events/webinar/consolidated-state-plan-lessons-learned-title-iv-part-student-support-and-academic
- Submit questions about the SSAE program during or after today's webinar:
   OESE.OSHS.TITLE.IV-A@ed.gov



# Lessons Learned from OSHS' Review of Submitted Consolidated State Plans and Q & As on Subgranting FY 2017 SSAE Funds to LEAs

Title IV-A of the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA)



#### **Webinar Logistics**

- This is a "Listen-Only" online event.
- If you have a question during the webinar, please enter it into the participant chat box.
- The Webinar recording and slides will be emailed to registrants and posted online within a week after today's event.
- If you are having any audio problems or other technical issues, please let us know by emailing <a href="mailto:ncssle@air.org">ncssle@air.org</a> or calling 1-800-258-8413.



# Poll 1: What is your role? (Check all that apply.)

☐State Education Agency (SEA)	District Administrator		
Director		Local Education Agency (LEA)	
□ SEA Program Staff Person		Administrator	
☐ Teacher		Principal/School Administrator	
□ Parent		Specialized instructional support personnel	
□ Policymaker		Tribal organization staff	
☐ Researcher		Local government representatives	
□ Advocate		Community-based organization staff	
☐ Student		Other (Please specify in chatbox.)	



### Welcome

David Esquith

Office of Safe and Healthy Students



#### Today's Agenda

1. Title IV-A State Plan Lessons Learned (Based on Review of First Cohort of 17 State Plan Submissions)

David Esquith, Office of Safe and Healthy Students (OSHS)

2. Changes to Subgranting (SSAE Changes to Subgranting Based on the Consolidated Appropriations Act of 2017)

Ivonne Jaime, OSHS Francisco Ramirez, OSHS

3. Available Resources

Francisco Ramirez, OSHS

4. Participant Q&A

David Esquith, OSHS



#### Title IV-A State Plan Lessons Learned

#### Be sure to:

- Address the requirements of the <u>revised</u> State Plan template;
- Address <u>all of the subparts</u> of the State plan requirement; and
- When prompted provide <u>a description</u> of what the SEA will <u>do</u>.



#### The Two Title IV-A State Plan Requirements

#1: Use of Funds (ESEA section 4103(c)(2)(A)):

Describe how the SEA will use funds received under

<u>Title IV- A Subpart 1</u> for State-level activities.

**#2: Awarding Subgrants** (ESEA section 4103(c)(2)(B)):

Describe how the SEA will ensure that awards made to LEAs under Title IV-A, Subpart 1 are in amounts that are consistent with ESEA section 4105(a)(2) (or the Consolidated Appropriations Act of 2017).



#### **#1: Use of Funds**

#### Provide a description:

- Example #1: SEA will use its Title IV-A State funds to provide technical assistance to LEAs on [an allowable use of LEA SSAE funds];
- Example #2: SEA will use its Title IV-A State funds to monitor LEA implementation of its Title IV-A application.

#### Do not provide only an assurance:

"SEA will comply with ESEA section 4103(c)(2)(A))."



#### **#2: Awarding Subgrants**

- Provide a description that addresses <u>all of the</u> <u>requirements</u> for the option that the SEA chooses to subgrant Title IV-A funds to its LEAs.
- These requirements will be addressed in the Subgranting Q & A portion of the webinar.



#### **Subgranting Q & A**

- Subgranting by Formula
- Subgranting by Competition
- Tydings Amendment
- Transferability



### Subgranting by Formula

Ivonne Jaime
Office of Safe and Healthy Students



#### Q & A #1

**Question:** What are the SSAE formula subgranting requirements?

Answer: Under section 4105(a) of the ESEA, an SEA that makes subgrants to its LEAs by formula must do so based on their relative shares of funds under Title I, Part A for the preceding fiscal year, except that no LEA may receive an allocation that is less than \$10,000.



#### Q & A #2

Question: How does a State determine if it has sufficient funds to provide <u>each</u> LEA with the \$10,000 minimum?

**Answer:** Conduct the "Initial Test."



#### The Initial Test

 This test requires a State to divide the amount of available SEA funds for LEA allocations by the total number of eligible LEAs in the State.

$$\frac{SEA \ funds \ for \ Title \ IV - A \ LEA \ Allocations}{Total \ Number \ of \ Eligible \ LEAs \ in \ State} = Initial \ Test \ Result$$

 The results will determine whether the SEA falls under "Scenario 1" or "Scenario 2."



#### **Decision Point When Making Formula Subgrants**

#### Scenario #1:

The SEA funds for LEA allocations are <u>SUFFICIENT</u> to provide each LEA with at least the \$10,000 minimum allocation if the funds were divided equally among all eligible LEAs.

#### **Initial Test**

[Determines which scenario the State will follow]

#### Scenario #2:

The SEA funds for LEA allocations are INSUFFICIENT to provide any LEA with at least the \$10,000 minimum allocation if the funds were divided equally among all eligible LEAs.



#### **Scenario 1: Conducting the Initial Test**

**Example:** SEA has \$500,000 available for LEA allocations and 5 eligible LEAs.

- Let's do the math: \$500,000 ÷ 5 = \$100,000
- **Decision point**: From the resulting amount of \$100,000 per LEA, the SEA would determine that funds are sufficient to provide each LEA with at least the minimum allocation, and would proceed with making formula subgrants via "Scenario 1."



#### Scenario 1: Step 1 of 4

For each eligible LEA, multiply the amount of SSAE funds reserved for LEA allocations by the percentage of available Title I, Part A funds that the LEA received for the preceding fiscal year.

#### Let's do the math:

SEA funds for Title IV-A LEA allocations  $\times$  an LEA's percentage of Title I, Part A funds for preceding fiscal year = an LEA's initial allocation

 $$500,000 \times 10 \text{ percent} = \text{an LEA's initial allocation of }$50,000$ 

**Keep in mind**: Once LEA initial allocations are determined based on the formula, allocations would be increased for those LEAs below the minimum award amount and decreased for all others.



#### **Scenario 1: Results From Step 1**

	Step 1: Initial	
LEA	Formula Allocation	
Alpha	\$300,000	
Bravo	\$135,000	
Charlie	\$50,000	
Delta	\$9,000	
Echo	\$6,000	
Total funds	\$500,000	



#### Scenario 1: Step 2 of 4

#### **Adjust Allocations Below Minimum:**

An SEA must adjust upward to \$10,000 the allocation for any LEA whose initial formula allocation is below \$10,000.



#### **Scenario 1: Results From Step 2**

LEA	Step 1: Initial formula	Step 2: Adjusted allocation for LEAs below \$10,000	
	allocation	<b>Φ10,000</b>	
Alpha	\$300,000		
Bravo	\$135,000		
Charlie	\$50,000		
Delta	\$9,000 \$6,000	\$15,000 \$10,000 \$10,000	}
Echo	\$6,000	\$10,000	<b>}</b> \$20,000
<b>Total funds</b>	\$500,000	\$20,000	-

#### Scenario 1: Step 3 of 4

#### **Adjusted Allocations**

After completing Step 2, an SEA must adjust downward, on a proportionate basis, the initial formula allocations for all other LEAs.

#### Let's do the math:

 For those districts below the minimum, determine the difference between their total initial allocations and their total adjusted allocations.

$$$20,000 - $15,000 = $5,000$$

Determine the sum of the initial allocation for all other districts.

Determine the percentage reduction for the adjusted allocations.

$$$5,000 \div $485,000 = 1.03 percent$$

#### Scenario 1: Step 3

**Adjusted Allocations (Continued)** 

#### **Example using Charlie LEA:**

Multiply the initial allocation by 1.03 percent.

 Reduce the initial allocation by the resulting amount for the adjusted allocation.



#### **Scenario 1: Results from Step 3**

LEA	Step 1: Initial formula allocation	Step 2: Adjusted allocation for LEAs below \$10,000	Step 3: Adjusted allocation for all other LEAs	Final adjusted allocation for all LEAs
Alpha	\$300,000		\$296,907	\$296,907
Bravo	\$135,000		\$133,608	\$133,608
Charlie	\$50,000		\$49,485	\$49,485
Delta	\$9,000	\$10,000		\$10,000
Echo	\$6,000	\$10,000		\$10,000
<b>Total funds</b>	\$500,000	\$20,000	\$480,000	500,000



#### Scenario 1: Step 4 of 4

#### Repeat and Adjust, If Necessary

If, as a result of Step 3, the adjusted allocation for any LEA is below the \$10,000 minimum allocation, the SEA must readjust the allocation upward to \$10,000, consistent with Step 2, and repeat Step 3.



#### **Scenario 2: Conducting the Initial Test**

SEA has \$500,000 available for LEA allocations and 55 eligible LEAs.

- Let's do the math:  $$500,000 \div 55 = $9,090$
- **Decision point**: From the resulting amount of \$9,090 per LEA, the SEA would determine that funds are **insufficient** to <u>provide each</u> LEA with at least the minimum allocation, and would proceed with ratably reducing allocations in accordance with "Scenario 2."



#### **Scenario 2: Ratable Reduction**

- Each LEA's allocation must be ratably reduced from the minimum allocation of \$10,000.
- This means that each LEA's allocation is the same as the total amount available for LEA allocations divided by the total number of eligible LEAs.
- The math is the same as in the "Initial Test," and each LEA receives an allocation of \$9,090.



### Subgranting by Competition Tydings Amendment Transferability

Francisco Ramirez

Office of Safe and Healthy Students



#### Q & A # 3

**Question:** May an SEA make SSAE competitive subgrants?

Answer: Yes. Under the Appropriations Act of 2017, subgrants can be made on a competitive basis to eligible LEAs to support well-rounded educational opportunities (section 4107), safe and healthy student programming (section 4108), and effective use of technology (section 4109).



#### Requirement for Competitive Subgrants

**Minimum Allocation**: At the State level, Title IV-A awards must be made such that at least 20 percent of available funds are used for well-rounded educational opportunities, at least 20 percent for safe and healthy students, and a portion for effective use of technology.

Minimum Award Amount and Duration: Each subgrant awarded shall be for a term of one year and in an amount of not less than \$10,000.



#### **Priorities for Competitive Subgrants**

- Greatest Need: Funding priority given to LEAs, or consortia of LEAs, with the greatest need.
  - Need based on the number or percentage of children counted under section 1124(c) of the ESEA (i.e., children counted for purposes of basic grants to LEAs under Title I, Part A of the ESEA)
- Geographic Diversity: Subgrant recipients must represent rural, suburban, and urban areas.



#### Q & A # 4

Question: May an SEA make SSAE subgrants to its LEAs both by formula and competitively?

Answer: Yes, the Department has determined that the FY 2017 Department of Education Appropriations Act, which provides authority for SEAs to make subgrants to LEAs through a competitive process, does not prohibit an SEA from choosing to make both competitive and formula-based subgrants with FY 2017 SSAE funds.



# Requirements for Making Subgrants both by Formula and Competitively

Making subgrants both by formula and competitively includes multiple requirements for competitive subgrants that may be challenging to reconcile with the statutory requirement for formula-based subgrants.



# Requirements for Making Subgrants both by Formula and Competitively

- SSAE funds awarded by formula must be provided to all eligible LEAs, and an SEA may not provide a predetermined allocation to every LEA, as this would not be formula-based.
- If an SEA chooses to award SSAE subgrants both by formula and competitively, it may not reduce an LEA's formula allocation if that LEA receives a competitive subgrant.



#### Q & A # 5

Question: Does the same period of fund availability apply to SSAE funds awarded by formula or competitively?

Answer: Yes. Because SSAE is a State-administered program, the "Tydings Amendment" applies and all FY 2017 SSAE funds, whether awarded by formula or competitively, remain available for obligation by LEAs through September 30, 2019.

For an SEA making competitive subgrants, FY 2017 funds remain available for obligation by the SEA until September 30, 2018, and by its LEAs under the Tydings Amendment until September 30, 2019.



#### **Subgranting and Transferability**

- An LEA that receives a Title IV-A competitive subgrant may not transfer funds to or from that award.
- An LEA may transfer funds only into a Title IV-A formula allocation and not into a competitive allocation.
- If the LEA does not receive a Title IV-A allocation, it may not transfer Title II funds to Title IV-A.



#### **Available Resources**

- Subgranting FY 2017 Title IV-A funds to LEAs: Questions and Answers <u>https://safesupportivelearning.ed.gov/sites/default/files/Subgranting\_FY\_2017\_Title\_IV\_A\_LEAs\_QA.pdf</u>
- ESSA Consolidated State Plans https://www.ed.gov/essa?src=rn
- SSAE Grants Non-Regulatory Guidance <u>http://www2.ed.gov/policy/elsec/leg/essa/essassaegrantguid10212016.p</u> <u>df</u>
- Q/As from Webinars 1-3
   <a href="https://safesupportivelearning.ed.gov/sites/default/files/SSAE\_Webinars1-3\_QAs\_5.26.17\_final.pdf">https://safesupportivelearning.ed.gov/sites/default/files/SSAE\_Webinars1-3\_QAs\_5.26.17\_final.pdf</a>



### Participant Q&A

David Esquith

Office of Safe and Healthy Students

## Thank you for participating in today's webinar!

- If you have SSAE program questions after the webinar, please email <u>OESE.OSHS.TITLE.IV-A@ed.gov</u>.
- The recording, slides, and Q/A for this webinar will be available on the National Center on Safe Supportive Learning Environment (NCSSLE) Website at <a href="https://safesupportivelearning.ed.gov/events/webinar/consolidated-state-plan-lessons-learned-title-iv-part-student-support-and-academic">https://safesupportivelearning.ed.gov/events/webinar/consolidated-state-plan-lessons-learned-title-iv-part-student-support-and-academic</a>.
- We will also email links to the recording and slides to those who registered.
- If you have questions about access to today's materials or future webinars, please contact the National Center on Safe Supportive Learning Environments at <a href="mailto:ncssle@air.org">ncssle@air.org</a>.