



AN EARLY COLLEGE DISTRICT

BROWNSVILLE

INDEPENDENT SCHOOL DISTRICT

SUPPORT PROGRAMS DEPARTMENT

2023 - 2024

Program Guidelines

&

Procedures

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SUPPORT PROGRAMS DEPARTMENT

Guidelines and Procedures

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SUPPORT PROGRAMS DEPARTMENT

OVERVIEW

Mission Statement:

To provide supplemental resources and compliance guidance to the District in order to provide all students with a fair, equal and significant opportunity to obtain a high-quality education and, at minimum, achieve proficiency on the state's challenging academic and performance standards in an effort to produce responsible, well-rounded graduates who will pursue a post-secondary education and/or career.

Vision Statement:

The vision of the Support Programs Department is to provide the highest level of service, guidance and support by identifying and maximizing financial resources while supporting the community and District's commitment to educational excellence in an effort to meet the needs of all students.

Department's Goals and Objectives:

Goal 1: To provide district-wide instructional programs to improve the achievement of eligible students through supplemental services and programs as identified in the District Improvement Plan.

Objectives:

- Encourage, support and monitor the implementation of federally funded programs such as, but not limited to Parent and Family Engagement, Migrant Services, Private Non-Profit Schools' Program, Extended Day/Week/Year and Summer Bridge Programs.
- Provide technical assistance to all campuses in order to ensure that the programs in place are addressing the academic needs of all students, specifically the low-achieving students.

Goal 2: To assist schoolwide campuses and provide funding to improve the entire instructional program and close the educational gap among eligible students through supplemental funds for services and programs as identified in each Campus Improvement Plan.

Objectives:

- Extended Day/Week/Year Tutorials, and Summer Bridge Programs;
- Curriculum Writing;
- Professional Development;
- Supplemental Instructional Programs in Reading, Math, Science, and Social Studies; and
- Other services, equipment, supplies and materials to supplement programs at the campus level as identified in the campus comprehensive needs assessment and district/campus

improvement plan.

Goal 3: To support family engagement and increase communication through district and campus strategies, activities and resources.

Objectives:

- Provide continuous two-way communication to parents/guardians and the community utilizing a variety of communication tools. All communication will be provided in English, Spanish and other languages upon request.
- Provide resources for parents/guardians that support at-home learning; parent portals and training on the use of different distance learning platforms.
- Provide parents/guardians the opportunity to actively engage in various advisory committees at both campus and district levels.

Goal 4: To provide financial support and guidance based on the identified needs of the District and Campuses:

Objectives:

- Allocate granted Federal funds to schools based on the campus' total number of economically disadvantaged students.
- Assess Campus Improvement Plans for accountability purposes and provide school administrators with technical support.
- Monitor capital outlay expenditures as identified in the respective Campus and District Improvement Plans.

Goal 5: To ensure that Federal funds are expended in accordance with Federal and State laws as well as Local policies and guidelines.

Objectives:

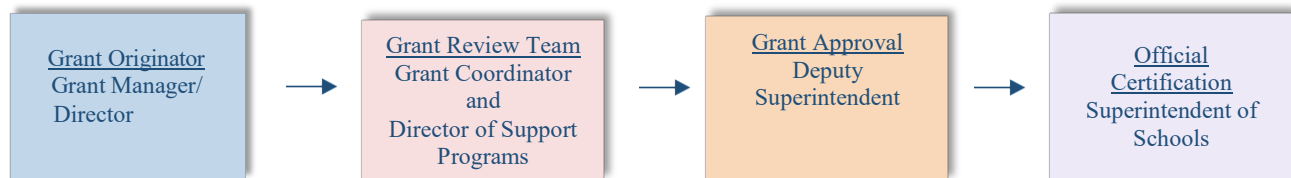
- Provide campuses with guidance in the areas of budget and program compliance so that sound fiscal and program practices are carried out.
- Review all federal expenditures including budgets, purchase requests, position control reports, extra-duty time sheets and composites.
- Provide information on federal funding guidelines to better assist campus administrators, faculty and staff in understanding the purpose and the intent of the Programs as well as its impact on student achievement.

ESSA Consolidated Application Funding Process

The application for Titles I-A (Improving Basic Programs), TI-C (Migrant Services), TII-A (Supporting Effective Instruction), TIII-A (Emergent Bilingual Program), and Title IV-A (Student Support and Academic Enrichment) funds is made through the submission to TEA of a consolidated application document known as the Standard Application System (SAS). The completion of this application requires the submission of both program and financial information for Title Programs. The Director of Federal Programs sends copies of the appropriate sections of the SAS to each Title Program Director/Coordinator so that they can provide the information that is required to secure funds for these Title Programs.

This documentation is returned to the Director of Federal Programs who compiles and inputs the information into eGrants. The final step is the application certification by the Superintendent of Schools, who attests that the data is correct and that the District will abide by the General Provisions and Assurances contained in the document.

The school district's ESSA Consolidated Application for Federal Funds grant application process is illustrated below on a flowchart. As noted on the flowchart, the application is originated by the Director of Federal Programs, reviewed by the Director and Coordinator of Support Programs, reviewed by the Deputy Superintendent, and ultimately reviewed, approved and certified by the Superintendent of Schools.



[NOTE: TEA allows federal grant expenditures from the grant application “stamp-in date”, however, expenditures that require TEA’s specific approval such as capital outlay will not be approved until TEA issues the Notice Of Grant Award (NOGA)].

Federal Requirements for District and Campus Schoolwide Program Plans

The District/Schoolwide Campus Plan requirements for a Title I-A schoolwide campus are to be incorporated in the District/Campus Improvement Plan. Specific requirements related to Title I-A schoolwide planning, which may be found in Public Law 107-110 (ESSA) – Sections 1114 and 1115, are as follows:

- 1) Federal funds on a schoolwide campus may be used only to support activities identified in the comprehensive needs assessment and described in the campus improvement plan.
- 2) Any eligible school that wishes to operate a schoolwide program shall first develop in consultation with the District and its school support team or other technical assistance provider under P.L. 107-110, Section 1117, a comprehensive plan for reforming the total instructional program in the school that-
 - a. Incorporate the requirements of a District/Schoolwide Plan cited in P.L. 107-110 Section 114(b);

- b. Clearly incorporate the three schoolwide components of a District/Schoolwide Program;
- c. Describe how the school will use federal funded resources and other sources to implement the Schoolwide Program.
Include a list of state and federal programs whose funds will be combined to implement a District/Schoolwide Program.
- d. Describe how the intent and purposes of the Federal programs whose funds are combined on a District/Schoolwide Campus are met, and for upgrading the entire educational program.

Note: Having 40% or more students that come from a low-socio economic background qualifies a campus for schoolwide status.

State Requirements for District and Campus Improvement Plans

In accordance with state requirements under Texas Education Code – 11.251(f) – Planning & Decision-Making Process, each campus improvement plan must:

1. Assess academic achievement for each student in the school using the academic excellence indicator system as described by Section 39.051;
2. Set campus performance objectives based on the academic excellence indicator system, including objectives for special needs populations, including students in special education programs under Subchapter A, Chapter 29;
3. Identify how campus goals will be met for each student;
4. Determine resources needed to implement the plan;
5. Identify staff needed to implement the plan;
6. Set timelines for reaching the goals;
7. Measure progress toward the performance objectives periodically to ensure that the plan is resulting in academic improvement;
8. Include goals and methods for violence prevention and intervention on campus
9. Plan and conduct education and training on Dating Violence for students, staff, and parents, and
10. Provide for a program to encourage parental involvement at the campus.

Local Requirements for District and Campus Improvement Plans

The Plan4Learning, a web-based program is utilized to develop district and campus improvement plans.

District and Campus Planning Process

Comprehensive Needs Assessment - State and Federal law both outline the requirement for schools to conduct a Comprehensive Needs Assessment (CNA) as part of the planning and decision-making process. Texas Education Code (TEC) Sections 11.25(a)(1-2) and 11.253 related to campus planning state that “the

plan must include provisions for a comprehensive needs assessment addressing student performance on the student achievement indicators, and other appropriate measures of performance.”

The CNA is conducted both at the district and campus levels to identify the needs that will drive the campus/district plans. The purpose of a CNA is to examine multiple sources of data and identify the priority needs and direction for the district and campuses. The data helps the District and schools monitor and assess the impact of programs, instruction, and other resources related to student achievement by developing a District and campus profile. Conducting a CNA is a process, not an event. While there may be specific times during the school year when targeted data analysis occurs, the data collection and analysis process is ongoing to ensure that progress toward the school’s objectives, goals, mission and vision are being realized.

The CNA focuses on four areas: demographics, student learning, district processes and programs and perceptions. The results of the Comprehensive Needs Assessment is the driving force behind the District as well as the Campus Improvement Plans. The District and Campus Improvement Plans serve as the blueprint for the District and schools. The process entails the following:

1. Follow local district policy, administrative procedures, and requirements of state statute to elect (or select, where appropriate) district and campus professionals for the district and campus committees.
2. Specialists, including staff knowledgeable of federal requirements, have an opportunity to provide input in the planning and decision-making process so the needs of students are appropriately addressed.
3. Conduct a comprehensive needs assessment, beginning with current student performance for all student populations tested.
4. Assess the needs of special populations - Needs assessment information should be available for all student populations served by Federal Funds. These include:
 - a. Title I-A, (Improving Basic Programs)
 - b. Title I-C (Migrant Ed. Services)
 - c. Title II-A (Supporting Effective Teaching)
 - d. Title III-A (Emergent Bilingual Program)
 - e. Title IV-A (Student Support/Academic Enrichment Program)
 - f. Title IX-A (McKinney-Vento Education Act/Homeless)
 - g. Career and Technical Education (CTE)
 - h. Dyslexia (DYS)
 - i. Gifted and Talented (GT)
 - j. Special Education (Sp. Ed.)
 - k. State Compensatory Education-At-Risk (AR)

5. Identify needs of other stakeholders and areas.
6. Organize for planning.
7. Provide training for committee members to develop skills in brainstorming, problem solving, and consensus building.
8. Select formats and procedures for developing plans.
9. Set times and locations for committee work.
10. Appoint skilled facilitators.
11. Provide for adequate clerical support.
12. Access needed materials, space, and equipment.
13. Conduct planning sessions. Identify resources necessary to accomplish performance objectives. If needed, conduct a cost-benefit analysis to provide support for prioritizing strategies and/or for generating additional resources.
14. Complete the planning documents. Include performance objectives for **all** student populations served, scientifically research-based strategies with sequential activities, incremental timelines for completion of activities, specific personnel assignments, resource allocations, and formative and summative evaluative criteria
15. Develop formative evaluation criteria that allow for periodic measurement of specific student outcomes related to performance objectives.
16. Develop recommendations for a comprehensive budget that will accomplish stated performance objectives.
17. Ensure that a draft of the proposed plans for the performance objectives has been made available for review to representatives of all stakeholder groups prior to final submission.
18. Allocate adequate resources to accomplish the strategies. Assign specific staff members to guide implementation of each strategy and activity within each plan and to be responsible for periodic evaluation of the completion of activities
19. Throughout the school year, it is suggested that the committee members report progress regarding implementation of the strategies to the respective district- and campus-level committees.
20. Implement the plans, ensuring fidelity to the strategies outlined.
21. Monitor the ongoing implementation of the plan and make adjustments as needed.
22. Evaluate the accomplishment of targeted performance objectives on an annual basis, following state requirements for public disclosure and input through public meetings.

Monitoring

The Federal/Support Programs Department personnel monitors Title I-A, Title II-A, and Title IV-A, programs through a process that involves both “desktop” monitoring and campus site visits as necessary. Desktop monitoring involves the review of paper and electronic documents. Some items that fall into this category include, but are not limited to:

- Substitute Time Sheets
- Purchase Requests
- Personnel Requests
- Position Control
- District Improvement Plans/Campus Improvement Plans and their Comprehensive Needs Assessments
- Campuses' Master Schedules
- Tutorial/Extended Day/Week/Year Time Sheets, Composites and Attendance
- Budgets and Budget Changes
- Expenditure Reports and Timelines
- Fixed Assets (TEA Inventory Disposition Request)
- Professional Leave Requests
- Professional Development System Reports
- Title I-A, Parent and Family Engagement Compliance Binder

Program Evaluation

The effectiveness of BISD's federally funded programs are evaluated annually. In order to determine the success of each program, statute requires that annual evaluations be conducted at the end of the program year and/or as soon as EOC/STARR test scores become available. The program evaluation measures how successful the school has been in addressing identified needs and meeting the goals of the program. Strategies and activities implemented by using the District Improvement Plan/Schoolwide Campus Improvement Plan are evaluated to determine if they are working towards achieving the desired outcomes.

The evaluation plan must include ways to determine whether:

- The academic achievement of all students, particularly those students that are struggling academically improved;
- Whether the goals and objectives included in the District Improvement Plan (DIP)/Campus Improvement Plan (CIP) were achieved; and
- If the DIP/CIP's goals and strategies are appropriate as written or are in need of revision.

The grant evaluation considers the following primary questions: (1) Has the federally funded program been effective?

(2) What has worked well in the federal funded program? (3) What has not worked well in the federally funded program? (4) Should federal program funds be redirected? The data is analyzed and the results of these analysis are used as the source of evidence to determine the answers to the four questions.

1. Additionally, online evaluation surveys are made available to all staff, students and parents as well as to the teachers at participating private schools. The survey is in English and Spanish for the

parents and it is used to evaluate the strengths and weaknesses of the program's impact on raising student achievement and in productively involving parent/guardians in their children's education.

2. The data is analyzed by the Support/Federal Programs Departments in collaboration/conjunction with the ARE Department, with the assistance of other district and campus staff, as needed.
3. The results of the evaluation are used to plan, implement and improve federal funded program.

As required by statute, federal grant funds must be redirected when evaluations indicate that programs and/or services are unsuccessful in producing desired results for students that are low performing and not meeting, at minimum, proficiency on the state's academic achievement and performance standards.

Federal Reporting

The Texas Education Agency requires the annual submission of several reports related to the use of federal funds. The Federal Programs Department collects and compiles the necessary data and prepares the reports for submission to the Agency for Title I-A, Title I-C, Title II-A, Title III-A, Title IV-A, and Title IX-A. These reports include, but are not limited to:

ESSA Consolidated Compliance report which consists of information regarding the implementation of Title I-A, Title I-C, Title II-A, Title III-A, Title IV-A, and Title IX-A that were implemented during the current school year. The Federal Programs Department collects the needed information from other departments and compiles the report which is reviewed and approved by the Director of Support Programs and Deputy Superintendent for Business and Operations prior to its certification by the Superintendent of Schools.

Federal law requires private schools to be contacted annually to determine which schools wish to participate in the Title I-A, Title I-C, Title II-A, Title III-A and Title IV-A. It is the responsibility of the District to ensure consultation with the private schools is timely and meaningful. Consultation must occur during the design and development of the programs and before the District makes any decisions affecting the opportunities of eligible private school children, teachers, and parents. Districts are required to document that the consultation has occurred. Private schools attest that this consultation has taken place by signing an Affirmation of Consultation form that is submitted to TEA in September.

Federal law requires that Title I-A, Title I-C, Title II-A, Title III-A and Title IV-A, and Title IX-A services be provided to eligible students at participating private non-profit schools on a basis that is equitable to services provided to public school students.

Coordination of Programs, Services and Funding

The Support and Federal Programs Departments coordinate Title I-A, Title I-C, Title II-A, Title IV-A, and Title IX-A, services and funds with a number of District Departments and Programs including, but are not limited to Curriculum and Instruction, Career and Technical Education, Special Services, Homeless Youth Education, Migrant Education, Professional Development, Technology and Health Services and programs such as STEM, Summer Bridge and Elementary and Secondary Summer School.

Procedures for Dissemination of Guidelines

The Support and Federal Programs Department will inform all campus and department administrators of

the availability of this written Program Guidelines and Procedures Handbook. The campus/department administrator is responsible for sharing the websites where these documents can be accessed with his/her campus/department faculty and staff. Following such dissemination of information, the Support and Federal Programs Director/Coordinators will provide guidance throughout the year to ensure a clear understanding of the Federal Program Guidelines and Procedures that are in place. In addition, the school administrators will ensure their federally funded campus personnel follow the guidelines in an effort to keep schools/district in compliance.

Extended Day/Week/Year Program Guidelines

In Brownsville ISD, every opportunity is extended to help our students become academically successful. The extended day/week/year tutorial program's sole focus is on improving the academic success of the struggling students. The Instructional Coach and/or Principal Designee, in consultation with the Program appropriate staff, will oversee an extended day/week/year learning programs for students identified as not meeting or being in danger of not meeting expected academic standards. The extended day/week/year programs offer students:

- Accelerated instruction to improve low performing students' achievement on assessment instruments administered under Subchapter B, Chapter 39 TEC, inclusive of STAAR;
- Accelerated instruction in subjects in the foundation curriculum (English Language Arts, Mathematics, Science, and Social Studies); and credit recovery.

The supplemental extended day/week/year learning time, as appropriate, may:

- Be outside the regular instructional day (e.g. before school, after school, Saturday, and/or summer);
- Have the student and teacher ratio at a minimum of 8:1; and
- Include the use of scientifically research-based instructional strategies that meet the educational needs of low performing students.

Prior to the start of the tutorial program, the Instructional Coach, Principal and/or Principal Designee shall:

1. Submit Supplemental Duty Recommendation Form(s) with required signatures of the employee, principal, funding administrator, support programs administrator and Assistant Superintendents. Tutorials shall not begin until form(s) have all of the appropriate signatures in place.
- Develop a tutorial schedule documenting the foundation curriculum area of focus, day(s) of week, and times when tutorials will be held.
- Ensure that the tutorial schedule is reflected in the Student Management System to maintain documentation of low performing student attendance and/or grades by teacher. Courses for tutorials/extended day must be entered in the Student Management System with the following course number: **970020**.
- Advise parents of low performing students of the Tutorial Program eligibility, and its schedule. Secure signed permission slips for each participant.

- Advise teachers, as appropriate, of tutorial guidelines, attendance and/or grading procedures, lesson plans, and targeted TEKS and performance objectives of assessment instruments administered under Subchapter B, Chapter 39 TEC.
- Advise teachers that all documentation will be maintained in accordance with Federal, State and Local guidelines. All documentation must be thorough, complete, and maintained for 7 years.
- Ensure that teachers, as appropriate, analyze performance data of assessment instruments.

During the tutorial program, the Instructional Coach, Principal and/or Principal Designee shall:

- Ensure that teachers complete lesson plans relevant to targeted TEKS and performance objectives administered under Subchapter B, Chapter 39 TEC addressed during tutorial sessions.
- Ensure that student attendance is entered on a daily basis in the district's school management system. In addition, grades are to be recorded in the District's approved grading Program.
- Oversee processes for the verification of low performing student attendance and/or grades.
- Conduct classroom observations to monitor the delivery of high-quality supplemental instructional services for students.
- Ensure each extended/week/year teacher clocks in after their regular contract time and clocks out at the approved program schedule.
- Submit an original Payroll Timesheet Supplemental Duty Composite form as a cover for all the timesheets. Ensure that all tutorial/extended day teachers are listed on the composite form, verify that there is an original timesheet for each tutorial/extended day teacher, and confirm that all appropriate signatures have been obtained prior to submission.
- Ensure that the Supplemental Duty Composite sheet and corresponding employee timesheets are submitted according to the Supplemental Duty Composite Payroll Schedule. ***Timesheets not submitted on a timely basis or missing signatures will result in a delay of payment.***

After the tutorial/extended day program has been completed, the Instructional Coach, Principal, and/or Principal's Designee shall:

- Submit the final Supplemental Duty Composite form and Payroll Timesheets according to the Supplemental Duty Composite Payroll Schedule.
- Ensure that all attendance and/or grade sheets are submitted, verified, and signed by each tutorial teacher to maintain documentation of supplemental instructional services rendered to low performing students.
- Ensure that all tutorial/extended day lesson plans are current and up to date and reflect materials or instructional strategies being used in order to assure proper documentation of supplemental instructional services rendered to low performing students.
- Maintain documentation of sample activities, strategies, and/or assessments utilized to address

targeted TEKS and objectives of assessment instruments administered under Subchapter B, Chapter 39 TEC during the tutorial program.

- Ensure that all previously mentioned documentation is submitted, by teachers and/or office staff for teachers at the end of the tutorial/extended day/week/year cycle.

Summer Bridge Program

The purpose of the Secondary Summer Bridge Program is to help transition incoming 6th grade and 9th grade students by providing extended learning opportunities that will promote their academic achievement and success during the regular school year.

The middle school program will focus on students entering sixth grade who failed to meet the SSI requirement (STAAR Reading and/or Math) during the spring STAAR administration. The minimum duration of the middle school program will be four class days for students and one teacher preparation day. Each middle school program may be staffed by one administrator, one counselor, teachers and support staff. The student-teacher ratio is 25 to 1

1. Teachers will be paid at the established rate for extra-duty pay as per the District's Compensation Plan.

High School Summer Bridge Program will serve incoming eighth grade students whose STAAR scores indicate a need for additional academic support. The high school program will include a minimum of four days of student instruction and one teacher preparation day. Each high school program may be staffed by one administrator, two counselors, teachers and support staff. The student-teacher ratio is 25 to 1. Teachers will be paid at the established rate for extra-duty pay as per the District's Compensation Plan.

The program may also implement flexible scheduling and may be extended if funding permits.

Procedural Guidelines for Summer Bridge

- Each campus will analyze student data and develop a detailed written plan for the summer bridge program to address identified needs.
- Campus administrators will select certified core area teachers for the program and submit recommendations to Human Resources Department in accordance with established procedures and time-lines.
- The following will be kept on file at the campus for each participating student:
 - A completed registration/information form
 - A signed Parent Commitment Form for participating students
 - Lesson Plans
- Each teacher is responsible for keeping lesson plans and student attendance.
- Timesheets and composites will be submitted to the funding source at the end of the program.

FEDERAL FISCAL REQUIREMENTS

Federal Fiscal General Provisions

Under the Education Department General Administrative Rules (EDGAR), the application of these cost principles is based on the fundamental premises that:

1. The non-Federal entity (BISD) is responsible for the efficient and effective administration of the Federal award through the application of sound management practices.
2. The non-Federal entity (BISD) assumes responsibility for administering Federal funds in a manner consistent with underlying agreements, program objectives, and the terms and conditions of the Federal award.
3. The non-Federal entity (BISD), in recognition of its own unique combination of staff, facilities, and experience, has the primary responsibility for employing whatever form of sound organization and management techniques may be necessary in order to assure proper and efficient administration of the Federal award.
4. The application of these costs principles should require no significant changes in the internal accounting policies and practices of the non-Federal entity. However, the accounting practices of the District must be consistent with these cost principles and support the accumulation of costs as required by the principles, and must provide for adequate documentation to support costs charged to the Federal award.
5. In reviewing, negotiating and approving cost allocation plans or indirect cost proposals, the Division for indirect costs should generally assure that the non-Federal entity (BISD) is applying these cost accounting principles on a consistent basis during their review and negotiation of indirect cost proposals. Where wide variation exists in the treatment of a given cost item by the non-Federal entity, the reasonableness and equity of such treatments should be fully considered.
6. For non-Federal entities that educate and engage students in research, the dual role of students as both trainees and employees (including pre and post-doctoral)
7. Staff contributing to the completion of Federal awards for research must be recognized in the application of these principles.
8. The non-Federal entity (BISD) may not earn or keep any profit resulting from Federal financial assistance, unless explicitly authorized by the terms and conditions of the Federal award.

Allowable Costs

Allowable costs are described in detail under the Education Department Guiding Administrative Rules (EDGAR) Sec. 200.400 through 400.475 and the Special Programs Purchasing Guide.

Period of Availability of Funds

Where a funding period is specified, a grantee may charge to the award only costs resulting from obligations of the funding period, unless carryover of unobligated balances is permitted, in which case the carryover balances may be charged for costs resulting from obligations of the subsequent funding period. Campuses may start spending funds for activities that have been incorporated into the Comprehensive Needs Assessment and District/Campus Improvement Plan in July of the current school year. A grantee must liquidate all obligations incurred under the award no later than 90 days after the end of the funding period (or as specified in a program regulation). The grant period deadline may be extended by the Texas Education Agency.

Carryover Funds

Under Federal law, no more than 15% of Title I-A funds allocated to the district during a given fiscal year may be carried over into the next fiscal year.

Projected Spending Timeline

As the purpose of federal funds is to improve student academic achievement, it is important that the supplies, materials and services purchased be in place in a timely manner so that the students will be able to utilize as soon as the year begins.

Campuses should have a minimum of 25% of their funds spent or encumbered by August. This percentage increases each month, rising to 65% in November and 95% by February.

Deadlines for budget changes, purchase requests and final receipt of goods are also established on an annual basis and shared with the campuses in an effort to keep everyone responsive to the projected spending target dates set for the school year.

Supplement, Not Supplant Requirement

Supplement, not supplant provisions require an LEA to use state or local funds for all services required by state law, State Board of Education (SBOE) rule, or local policy and prohibit those funds from being diverted for other purposes when federal funds are available.

Beginning in school year 2021-2022 the Statement of Exemption for Title I-A has been signed into effect and a copy has been kept at the Support, Federal and Superintendent's offices for future reference and auditing purposes. The Statement of Exemption is signed when the ESSA Consolidated Federal Grant Application is submitted to TEA for the current school year. It foregoes the Supplement/Not Supplant requirement for Title I-A. The purpose of the requirement as it applies to Title I-C, Title II-A and Title IV-A is to ensure that the level of state and local support for programs remains at least constant and is not replaced by federal funds. Title II-A funds are used to supplement (add to, enhance, to expand, or increase) the funds available from non-federal sources, and not to supplant (replace or take the place of) the existing non-federal funds.

A) **Staffing-** When a vacancy becomes available, the principal and/or department administrator initiates a personnel request (PR) through TalentEd. Once the PR has been reviewed for compliance and the department determines that the position is valid, the PR is processed via the TalentEd system that Human Resources utilizes to complete the hiring process. Should the documentation be complete, a "Report to Work" letter will be issued.

Once the campus or department is in receipt of the “Report to Work” letter, then and only then, can the individual on the PR report to their newly assigned position. The Human Resources Department then works closely with the Payroll Department to properly code the funding source and ensure that the proper funding source is being debited for the personnel in place. The Support Programs Departments maintain records of all personnel that are funded in full or in part from Title I-A funds, Title II-A and Title IV-A.

B) **Master Schedules**- Master Schedules will be secured from the District’s Student Management System and printed to verify certified positions funded through federal funds are accurate in terms of personnel requests (PRs).

- 1) **Supplies and Materials**- Ordering of supplies and materials in accordance to EDGAR regulations, Support Programs’ Guidelines and District purchasing guidelines will be closely monitored through the approval process on the BusinessPLUS system to ensure that materials being purchased are in fact supplemental, reasonable, allocable and necessary to carryout the intent of the Title Programs.
- 2) **Capital Outlay**- Any Purchase Request for capital outlay will be reviewed and the need for capital outlay must be identified in the Comprehensive Needs Assessment, justified through a capital outlay questionnaire and correlated to a campus/district improvement plan strategy.

Campus Allocations

Title I-A funds are allocated to BISD campuses on an equal per pupil basis. The per pupil allocation is determined by dividing the total current year allocation plus carry forward, if applicable, less district set asides by the total number of students enrolled. Allocations for services to private non-profit schools include a proportional share of district set aside funds. Allocations for Title II-A are based on a formula basis and are utilized to pay for middle and high school certification stipends and travel (in-district and out-of-district).

The Title I-A budgets for individual campuses are determined for the upcoming school year by multiplying the projected number of students (as per PEIMS enrollment projections) by the per pupil allocation. Campuses are provided annually with budget worksheets. These electronic worksheets are used by principals to allocate Title I-A funds into the appropriate functions and accounts which are based on the needs of the individual campuses. These needs must be identified in the comprehensive needs assessment (CNA) and in the campus/district improvement plans (CIP/DIP) and documented in the budget worksheets. The hard-copy of the budget worksheet must be signed by the campus principal and/or designee as well as their perspective Area Assistant Superintendents and turned in to the Support Programs Department for processing. Allocations may change due to changes in personnel and budget adjustments will take place accordingly. The following forms, if applicable, must be turned in along with the budget worksheets. These are:

- a. budget worksheet;
- b. electronic equipment request form and use of funds questionnaire;

- c. BISD software evaluation; and
- d. certified personnel stipend forms for PK-3, high school & middle school core-area and elementary coding teachers;

The following forms are made available along with the budget worksheets as resources for budget planning:

1. projected personnel cost;
2. Support Programs staffing projections;
3. elementary, middle school and high school extra-duty planning and transportation worksheets.

Additional funds are reserved for necessary district-level initiatives/activities prior to the allocation of funds to campuses, including those related to parental, administrative cost, professional development, equitable services to private school students.

Funding Designations

- Function 11 – for instructional activities to address the academic needs of students (80% minimum);
- Function 12 – to increase reading resources (5% maximum)
- Function 13 – for addressing the professional development needs of instructional staff at campuses and district level (10% maximum);
- Function 23 – for addressing instructional leadership activities (10% maximum)
- Function 31 – for addressing guidance and counseling activities (10% maximum)
- Function 33 – for addressing health services activities (2% maximum)
- Function 61 – parental involvement activities at the district and campus levels (1% minimum)

Title II-A funds are allocated based on the comprehensive needs assessment findings and stakeholders' survey results. These funds are used to pay for teacher core-area stipends for middle and high school. Travel opportunities for participating Private Non-Profit school teachers and principals as well as District Program Directors.

Title IV-A Planned use of funds:

1. Function 21 or 23 - Administration (2% maximum)
2. Function 11 - Activities to support well-rounded educational opportunities (20% maximum)
3. Function 11 and 31 - Activities to support safe and healthy students (20% maximum)
4. Function 11 and 23 - Activities to support technology (an amount must be budgeted)
5. Technology Infrastructure (15% maximum of amount budgeted for activities to support technology).

Federally Funded Personnel

All teachers paid with federal funds must be certified in the area of assignment. Instructional assistants must hold an associate degree and/or 48 college hours. In addition, a signed job description/evaluation must be kept on file at the campus and readily available for auditing purposes for all federal funded personnel. Moreover, a time and effort certification form will be signed by all federal funded personnel at the completion of each semester (fall/spring/summer). A copy will be kept at the campus and the original will be submitted to each appropriate Program Department. In addition, split-funded personnel must keep daily activity logs to show the percentage of time that is spent on grant activities. These logs are submitted to the Federal Programs Department on a monthly basis and are kept on file for auditing purposes.

Time and Effort Certification Reporting Procedures

Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

Our internal control system requires Time and Effort Certifications to be completed for all federally funded personnel. The Federal Programs Department maintains auditable records that show how each federal funded employee spent his or her compensated time. These records are written, after-the-fact (not estimated or budgeted) documentation on

how time was spent. Time & Effort forms will be disseminated after the end of the Fall Semester, after the end of the Spring Semester, and after the end of the Summer School Program. Time and Effort Certification Forms are to be signed by each employee to reflect the following:

1. An employee, including substitutes, who is paid at 100%, 50%, 40% or other percentage.
2. Employees paid from multiple funding sources must also submit Time and Effort Daily Logs to the Federal Programs Department.
3. An employee must also acknowledge and indicate which federal grant fund is used to pay for his/her personnel costs.
4. An employee must specify the position that is funded (Teacher, Tutorial/Extended Day Teacher, Certification Stipend, etc.).

Semi-Annual Certifications

The semi-annual certification must be signed by each federally funded employee and the Principal having first-hand knowledge twice a year of the work performed as related to the employee's signed and dated job description. A copy of said certification must be submitted to the appropriate funding department for auditable purposes after the end of each semester. Employees paid at a 100% are not required to maintain a Time and Effort Daily Log. However, each employee must certify in writing, at least semi-annually, that he/she worked solely on Title I-A, Title II-A, and Title IV-A activities.

Split-Funded Monthly Reports

Time and Effort daily logs are maintained by all personnel whose salaries are charged partially to Title I-

A, Title II-A, and Title IV-A, in combination with other funding sources. All personnel that are split funded complete a time and effort daily log which reflects daily duties that were performed during the month and document the percentages of time spent. Monthly reports signed by each employee and campus administrator are kept on file for auditing purposes.

Job Descriptions

Employees are required to sign and date a job description which clearly shows that the employee is aware that they are performing supplemental federal grant activities to the program or single cost objective. The job description must be updated annually or when a function or activity is added to or deleted from an existing job description, must clearly identify the function and activities performed by the employee for the applicable fund source(s) or cost objective, and must be maintained at the campus. In addition, the daily schedule for all federally funded employees must be signed and kept on file for daily reference and auditing purposes.

Expenditures

The use of all federal funds are guided by Federal and State laws and guidance, financial standards as outlined in the Education Department General Administrative Rules (EDGAR), and BISD policy and procedures. However, the most restrictive Federal, State or Local rules must be followed.

Vendors & Consultants

All vendors must be on the BISD Board approved vendor list or belong to one of the State approved purchasing

co-op groups. Consultants must be on the BISD Board approved consultant list. Prior to obtaining the services of a consultant, the campus or department requesting such services must submit a Consultant Request Form and vita or other supporting documentation to the funding administrator for approval. When federal funds are being used, this request is first sent to the appropriate funding Program Department for said approval.

Electronic Equipment (costing more than \$150, but less than \$5,000)

Campuses are provided with electronic equipment requests forms in an effort to determine their campus needs prior to the submission of the ESSA Consolidated Application for Federal Funding. Each campus intending to use federal funds for electronic equipment must submit a list of each item to be purchased, along with the quantity, price and the location of where the items will be utilized/stored is required. The need for such items be identified in the campus comprehensive needs assessment and the CIP activity. The campus must also submit answers to the TEA Use of Funds Questionnaire which justify the need and proposed use of each item to be purchased. This questionnaire and the electronic request form must be attached to the PR and the items that are being ordered on the PR must match the items specified in the electronic request form and justified in the questionnaire.

- 1.) Safeguarding controls for all equipment, supplies and materials must be in place.
- 2.) Electronic equipment costing more than \$150, but less than \$5,000 will be purchased under

object code 6398.

6398-62 Computer equipment for instruction

6398-65 Computer equipment for non-instruction

3.) Fixed assets costing more than \$5,000 will fall under 6639-65.

Once the ESSA application is submitted to TEA, campuses/departments can start the purchasing process by initiating a Purchase Request (PR) in the BusinessPLUS system and must include the location number of where items will be utilized and/or stored.

The TEA Inventory Disposition Form and the BISD Fixed Asset Disposition/Transfer forms are both required for items that will be disposed, transferred, lost or reported stolen.

Purchase Requests

Purchase requests for the use of federal funds are initiated at the campus or department level using the electronic BusinessPLUS system and follow the purchase request workflow. These requests are approved first by the campus or department administrator and are then reviewed by the funding administrator and Special Programs Administrator to determine that the expenditures are:

- Allowable – Is it an allowable expenditure under Program guidelines? (see Title I-A Funding Guide)
- Allocable – Is it specific to the federal funding program’s intent and purpose?
- Reasonable – Is the price realistic?
- Necessary – Is it essential to increase student academic achievement?

After-the-fact purchase requests are seldom generated and only approved for emergency and/or unforeseen reasons that may come about for grant activities that have been written into the grant, meet the grant’s guidelines, and/or have been Board approved.

Practical questions to consider before an expenditure takes place:

- Do I really need this item(s)?
- Does the expenditure address valid campus program needs?
- Is this the minimum amount I need to spend to meet my need?
- Do I have the capacity to use what I am purchasing?
- Is the price being paid for the item(s) a fair rate?
- If I were asked to defend this purchase would I be able to?

Additionally, purchase requests must support activities in the District Improvement Plan (DIP)/Campus Improvement Plan (CIP) that are based on the District/Campus’ Comprehensive Needs Assessment (CNA). Capital outlay expenditures must be included and approved in the ESSA consolidated grant application prior to the purchase request(s) being made.

The private non-profit school’s coordinator works closely with the private schools to determine Program needs.

The staff generate all purchase request for the PNP Schools.

Software

Purchase Requests for new software and license renewals must have an approved Software Evaluation Approval/Return of Investment Form attached. These forms are initiated by the campus and submitted to the designated ISET Contact. They are then reviewed, signed if approved, and returned to the initiating campus. Once the new software has gone through the vetting process, the campus may generate the PR and attach the approved Software Evaluation Approval/Return of Investment form.

Extra-Duty Pay

Extra-duty pay that is funded with federal funds is also reported and documented on a monthly basis. Documentation consists of extra-duty recommendation forms, complete payroll report and supplemental duty composite forms. Initially, the recommendation forms are signed by the employee that is being recommended and a campus/program administrator prior to being submitted to the Federal and Support Programs Departments for funding approval. The monthly time-sheets are verified by the Programs' secretaries and if necessary, adjustments are made to the supplemental-duty composite form before it is signed by the Federal and Support Program Directors.

Names of personnel being recommended for extra-duty assignments recommendations must be submitted to the Federal Programs Department for pre-approval before initiating the intended program. If the extra-duty involves tutorials/extended day/week/year, the classes must be entered into the District Student Management System for accountability purposes.

If a campus elects to use a portion of their allocation for supplemental activities including, but not limited to Extended Day/Week/Year Tutorials, and Curriculum Writing, the following will apply:

- Each individual being considered for tutorials/extended day will be given a job description that describes the purpose, intent and duties of the tutor (or other position to be funded).
- Name(s) of the certified employee(s) to be recommended will be submitted to the Federal and Support Programs' Directors using the Supplemental Duty Recommendation form for signature of approval. Said form will then be sent the campus' Assistant Superintendent and then to the Human Resources Department for processing.
- Name(s) of the classified employee(s) to be recommended will be submitted to the Federal/support Programs' Directors using the Supplemental Duty Recommendation form for signature and approval. Said form will be kept on file at the Federal and Support Departments. In addition, an additional work approval form for the duration of the program will be processed for signature and approval. A copy will be kept on file and the original form will be returned back to the campus to serve as justification for the overtime compensation being paid for work that was performed.
- Complete payroll reports, signed by the employee and administrator or supervisor, will be turned in on a timely basis each monthly pay period for the duration of said activity along with the time sheet sign-in or Timeclock Plus report for the pay period being submitted for payment.
- A copy of the payroll distribution report will be secured, reviewed and reconciled on a monthly

basis by the Support Programs Department in an effort to stay abreast of personnel movement from one fund to another which ultimately has an impact on funding.

- A Time & Effort form will be signed by the individual hired and the Principal/Administrator upon completion of said tutorial/extended day/week/year stating the duration of the program. A copy will be kept on file at the campus along with the required documentation (lesson plans, attendance sheets, grades, assessments, evaluation of the extra duty program) and the original Time & Effort forms will be sent into the Federal Programs Department to serve as documentation for auditing purposes.

The Payroll Department staff is responsible for reconciling extra-duty pay to actual pay and if necessary, the Payroll department makes the necessary adjustments. Stipends paid from federal funds are also reported, documented and are subject to the same corroboration checks noted earlier.

Stipends

Stipends from federal funds are paid for off-contract activities such as staff development, curriculum planning/writing. These stipends are paid at the rate established by the District's Compensation Plan. Stipends for participation in off-contract professional development will be paid at the District's established rate, currently \$75 for a half-day training and \$150 for a full-day. A recommendation form must be approved by Special and/or Federal Departments before the activity takes place.

Once the activity takes place, the composite form, the sign-in sheet(s) with original signatures must be submitted to the Federal and/or Support Programs Departments for processing. Submission to the Payroll Department will follow. Activities include the following:

- Stipends for staff development;
- Certification, core area, coding and three-year-old teacher stipend forms are submitted at the beginning of the year for the current school year;
- There will be two separate checkpoints where the stipend forms will be reconciled with Human Resources to ensure the appropriate teacher is receiving the correct stipend. These are as follows: The first Friday of October and the last Friday in January;
- Stipends will not be paid when CPE hours are being awarded.

Professional Development - District Level

General Procedures

Professional development efforts must address the needs identified in the District's and/or campus's Comprehensive Needs Assessment (CNA) and a professional development request form must be in place prior to travel date(s).

Pre-approval by the funding source is required for the following:

- Consultant requests
- Out-of-district professional development application forms that include registration fees, travel expenses, and teacher substitute costs
- In-district professional development application forms, including virtual trainings,

when federal funds are requested for a substitute pay, registration fees, and stipends.

Professional development activities such as curriculum writing will be paid at the established “extra duty” rate, currently \$35 an hour. Supplemental recommendations forms must be approved before the activity takes place, a sign-in sheet with original signatures and a composite form are to be submitted to the Federal (fund 211) and/or Support Programs (funds 255 and 289) Departments for processing and submission to the Payroll Department.

Professional leaves must be submitted to the funding source 30 working days prior to the event, if travel arrangements will be made by the Travel Department. Professional leaves that do not require travel arrangements made through the Travel Department must be submitted 15 days in advance. The approved professional leave(s) must be attached. Extenuating circumstances will be considered for those professional leaves that do not meet district travel guidelines.

Federal Funding Guidelines

Funds must be expended for reasonable and necessary costs in conducting grant activities. Reasonable means a cost is consistent with prudent business practice and comparable to current market value. Necessary means the cost is essential to accomplish the objectives of the project. All costs must be properly supported by the original source documentation (i.e., invoices, receipts, purchase orders) to be ultimately reimbursable by TEA. Districts must comply with the applicable Federal cost principles in expending grant funds.

The purchasing guide has been formulated to simplify District legal, local, administrative and Texas Education Agency policies and procedures. It is essential that Brownsville Independent School District employees involved in

the use of supplemental Federal funds be fully aware of their responsibilities and limitations. in order to ensure that these students at minimum achieve proficiency in the state’s achievement and performance standards. While this guide does not cover every detail of all regulations, practices, and statutes governing supplemental federal foundation curriculum procurements, it does provide the basic principles of sound supplemental purchases. Reference to this guide will aid district staff in the discharge of their duties involving fiscal control and management of supplemental Federal funds.

Procedures and Documentation

The Federal and Support Programs Departments ensure and document that supplies, materials and equipment purchased with federal funds meet program requirements by verifying that each purchase has been identified as a need and a supporting strategy is included in the District Improvement Plan/Campus Improvement Plan. The inclusion of the CNA where the need was identified is included in the DIP/CIP strategy number that supports the Purchase Request and serves as supporting documentation.

Effective Controls

The Education Department General Administrative Rules (EDGAR) requires the establishment of internal

controls to provide reasonable assurance that federal funds are being managed in compliance with Federal statutes, regulations and the terms and conditions of the grant. Guidance for these internal controls may be found in “Standards for Internal Control in the Federal Government,” issued by the Comptroller General of the United States.

These controls require:

- Accountability for all funds, property, and assets
- Adequate safe-guarding of all assets
- Assurance of use solely for authorized purposes

Safeguarding of Assets

2CFR 200.302(b)(4) states the non-Federal entity “must adequately safeguard all assets and assure that they are used solely for authorized purposes.” Supplies are defined in 2 CFR 200.94 as all tangible personal property other than equipment, including computing devices when the acquisition price is below \$5,000 or the LEA’s capitalization threshold.

The district and campuses must implement controls that provide reasonable assurance regarding the prevention or prompt detection and correction of unauthorized acquisition, use, or disposition of federal assets. These assets are not limited to items on the fixed-assets inventory. All supplies, materials and electronic devices must be safeguarded and tracked. The misappropriation or theft of assets purchased with Federal funds is considered fraud. Practical questions to identify risks needing stronger controls follow:

- On what do we spend the most money?
- What assets do we need to protect?
- What could go wrong?

The BISD Fixed Assets Department conducts an annual inventory of all capital outlay items that have been purchased with federal funds. Campuses are encouraged to conduct their own periodic checks to determine that these items are in place at the designated location on the inventory list. Any thefts or losses are to be reported in a timely manner in accordance with BISD policies and procedures to the BISD Police and Security Department. Equipment must be tracked until it is properly disposed and removed from the subgrantee’s inventory.

Campuses must establish and implement procedures for safeguarding supplies, materials and equipment. These may include, but are not limited to:

- Documentation of the location for items purchased with federal funds;
- Proper storage of equipment, supplies and materials in locked areas with limited access, as appropriate;
- A system for teachers, parents and/or students to check out equipment or materials;
- Documentation that the items purchased are used solely to meet the intent and purpose of the

federal funded program.

Documentation is a necessary part of an effective internal control system. Therefore, campuses must keep copies of inventories and other documentation of the distribution, use or disposition of supplies, materials and equipment on file for seven years as required by Federal grant guidelines.

Records Retention and Storage

Effective July 1, 2015, Federal law requires that financial records, statistical records, supporting documents, and all other records pertinent to a Federal award be retained for reference as well as auditable purposes. The Education Department Administrative Rules (EDGAR) requires that records be retained for three years from the date of submission of the final expenditure report (Section 200.333). The Texas Education Agency does provide otherwise; TEA's required records retention policy specifies a records retention period of seven years.

Failure to adequately document that federal funds were expended in accordance to federal guidelines could result in severe penalties to the District. This could include the loss of future federal funding or the repayment of the questioned federal expenditures from local funds. Therefore, it is imperative that records documenting the use of federal funds be accurate and complete.

At the district level, documentation of the use of funds is kept through the records maintained by the Federal and Support Programs, Finance Department, Human Resources Department, and Payroll Department. These records include items such as the annual applications for funding, compliance reports, budgets, expenditure reports, purchase orders, payments, personnel requests, extra-duty recommendation forms, time-sheets, time and effort certification forms and payroll reports.

Campuses must also keep records that document and justify their use of all federal funds. Due to possible personnel changes, it is strongly suggested that each campus develop a written guide regarding what documents are retained, the position(s) of the individuals responsible for various documents, and where the records are located. Campus records must include copies of the CNAs and CIPs for each year that support each expenditure. Other records and documentation by the type of expenditure may include supplies, materials, equipment purchase orders, verbal/written quotes, item descriptions/specifications:

- Professional Development: Professional Leaves, Agendas, Sign-In Sheets, Purchase Orders, Stipends, Composites.
- Tutorials/Extended Day/Week/Year: Complete payroll reports (timesheets), Composites, Lesson Plans, Attendance Sheets and Student Sign-In Sheets.
- Curriculum Writing: Complete payroll reports (timesheets), and Composites.
- Parent and Family Engagement: Agendas, Sign-In Sheets, Meeting Minutes, Purchase Orders, Purchase Orders, Professional Leaves and Sessions' Evaluations.

The storage of records as either paper or machine-readable documents under EDGAR 200.335 states, "When original records are paper, electronic versions may be substituted through the use of duplication or other forms of electronic media provided that they are subject to periodic quality control reviews,

provide reasonable safeguards against alteration, and remain readable.” Therefore, care must be taken when storing documents electronically to ensure that hardware and software will be available to read and/or retrieve the documents should that be necessary

Transportation

Transportation is an allowable expenditure for extended day (before school and after-school instructional activities), extended week (Saturday instructional activities), extended year (summer school instructional activities).

The Web Travel (Finance Department website) transportation request forms must be approved by the Campus Administrator, Funding Director, Assistant Superintendent, and Deputy Superintendent. The Web Travel request for tutorial/extended day transportation should be completed for the entire school year. For transportation payment, the approved form is then attached to each monthly electronic purchase request that is generated in the District’s BusinessPLUS Stores Inventory. Dates and times for requested transportation must be clearly stated on both forms.

EVERY STUDENT SUCCEEDS ACT: TITLE I-A

Improving Basic Programs

The purpose of Title I-A is to provide all children, particularly low-achieving children in the highest-poverty schools, with a fair, equal, and significant opportunity to obtain a high-quality education and reach, at minimum, proficiency on challenging State academic achievement standards and state performance standards in an effort to close achievement gaps. This purpose can best be accomplished by:

- (1) Ensuring that high-quality academic assessments, accountability systems, teacher preparation and training, curriculum, and instructional materials are aligned with challenging State academic standards so that students, teachers, parents, and administrators can measure progress against common expectations for student academic achievement;
- (2) Meeting the educational needs of low-achieving children in our Nation’s highest-poverty schools, limited English proficient children, migratory children, children with disabilities, Indian children, neglected or delinquent children, and young children in need of reading assistance;
- (3) Closing the achievement gap between high and low performing children, especially the achievement gaps between minority and non-minority students, and between disadvantaged children and their more advantaged peers;
- (4) Holding schools, local educational agencies, and States accountable for improving the academic achievement of all students, and identifying and turning around low-performing schools that have failed to provide a high-quality education to their students, while providing alternatives to students in such schools to enable to students to receive a high-quality education;

- (5) Distributing and targeting resources sufficiently to make a difference to local educational agencies and schools where needs are greatest;
- (6) Improving and strengthening accountability, teaching and learning by using State assessment systems designed to ensure that students are meeting challenging State academic achievement and content standards and increasing achievement overall, but especially for the disadvantaged;
- (7) Providing greater decision-making authority and flexibility to schools and teachers in exchange for greater responsibility for student performance;
- (8) Providing children an enriched and accelerated educational program, including the use of schoolwide programs or additional services that increase the amount and quality of instructional time;
- (9) Promoting schoolwide reform and ensuring the access of children to effective, scientifically based instructional strategies and challenging academic content;
- (10) Significantly elevating the quality of instruction by providing staff in participating schools with substantial opportunities for professional development.
- (11) Coordinating services under all parts of this title with each other, with other educational services, and, to the extent feasible, with other agencies providing services to youth, children, and families, and
- (12) Affording parents substantial and meaningful opportunities to participate in the education of their children.

The Federal Programs Department Director and Support Programs Coordinator secure and compile Title I-A through TIV-A Program information and ensure that the ESSA Consolidated Application for Federal Funding is submitted on an annual basis in an effort to secure Title Programs' funding for the Brownsville Independent School District.

ESSA Schoolwide Program Requirements

(Element 1) SWP Comprehensive Needs Assessment

(Element 2) SWP Campus Improvement Plan Requirements

(Element 3) Parent and Family Engagement Requirements

(Element 1) SWP Comprehensive Needs Assessment (Section 1114(b)(6))

Campuses operating a schoolwide program must conduct a comprehensive needs assessment of the entire school that includes:

- Information on the academic achievement of students in relation to the challenging State academic standards, particularly the needs of those students who are failing, or are at-risk of failing, to meet the challenging State academic standards and any other factors as determined locally.

(Element 2) SWP Campus Improvement Plan (CIP) (Section 1114(b))

An eligible school operating a schoolwide program may use Title I funds for any activity that supports the needs of students in the school as identified through the comprehensive needs assessment and articulated

in the schoolwide plan. The school shall develop a Campus Improvement Plan that includes:

- A description of the strategies that the school will be implementing to address school needs, including a description of how the strategies will:
 - provide opportunities for all children to meet the 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
 - address the needs of all students in the school, but particularly the needs of those at risk of not meeting the challenging State academic standards
- If programs are consolidated, the specific State educational agency and local educational agency programs and other Federal programs that will be consolidated in the schoolwide program.

(Element 3) SWP School Parent and Family Engagement Requirements (Section 1116(b-c))

A campus that receives Title I-A funds must conduct outreach to all parents and family members and implement programs, activities, and procedures for the involvement of parents and family members in programs assisted under this part consistent with this section. Such programs, activities, and procedures shall be planned and implemented with meaningful consultation with parents of participating children.

- **School Parent and Family Engagement Policy**

Campuses served under this part shall jointly develop with, and distribute to, parents and family members of participating children a written parent and family engagement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements. Parents shall be notified of the policy in an understandable and uniform format and, to the extent practicable, provided in a language the parents can understand. The policy shall be made available to the local community and updated periodically to meet the changing needs of parents and the school.

Each campus served under this part shall—

- convene an annual meeting, at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school’s participation in a SWP and to explain the requirements and the right of the parents to be involved;
- offer a flexible number of meetings, such as meetings in the morning and/or evening, and may provide, with funds provided by Title I-A, transportation, child care, or home visits, as such services relate to parental involvement;
- involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parent and family engagement policy and the joint

development of the schoolwide program plan, except if a school has in place a process for involving parents in the joint planning and design of the school's programs, the school may use that process, if such process includes an adequate representation of parents of participating children

- provide parents of participating children—
 - timely information about programs under this part;
 - a description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the achievement levels of the challenging State academic standards; and
 - if requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible; and
 - if the schoolwide program plan is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA.

- **Shared Responsibilities for Student Academic Achievement (Section 1116(d))**

Each campus served under this part shall jointly develop with parents for all children served under this part a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and how the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall—

- describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the challenging State academic standards, and the ways in which each parent will be responsible for supporting their children's learning; volunteering in their child's classroom;

and participating, as appropriate, in decisions relating to the education of their children and positive use of extra-curricular time; and

- address the importance of communication between teachers and parents on an ongoing basis through, at a minimum—
 - parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement;
 - frequent reports to parents on their children's progress;
 - reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities; and

- ensuring regular two-way, meaningful communication between family members and school staff, and, to the extent practicable, in a language that family members can understand.
- **Building Capacity for Involvement Section 1116(e-f)**
To ensure effective involvement of parents and to support a partnership among the school involved, parents, and the community to improve student academic achievement, each campus and LEA assisted under this part—
 - shall provide assistance to parents of children served by the school or local educational agency, as appropriate, in understanding such topics as the challenging State academic standards, State and local academic assessments, the requirements of this part, and how to monitor a child’s progress and work with educators to improve the achievement of their children;
 - shall provide materials and training to help parents work with their children to improve their children’s achievement, such as literacy training and using technology (including education about the harms of copyright piracy), as appropriate, to foster parental involvement;
 - shall educate teachers, specialized instructional support personnel, principals, and other school leaders, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school;
 - shall, to the extent feasible and appropriate, coordinate and integrate parent involvement programs and activities with other Federal, State, and local programs, including public pre- school programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children; and
 - shall ensure that information related to school and parent programs, meetings, and other activities is sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand; and
 - shall provide such other reasonable support for parental involvement activities under this section as parents may request.

In carrying out the parent and family engagement requirements of this part, LEAs and campuses, to the extent practicable, shall provide opportunities for the informed participation of parents and family members (including parents and family members who have limited English proficiency, parents and family members with disabilities, and parents and family members of migratory children), including providing information and required school reports in a format and, to the extent practicable, in a language such parents understand.

Special Rule-If the campus has a parent and family engagement policy that applies to all parents and family members, such school may amend that policy, if necessary, to meet the above requirements.

Amendment-If the LEA has a parent and family engagement policy that applies to all parents and family members in all campuses served by the LEA, it may amend the policy, if necessary, to meet the above requirements.

Title I-A

Schoolwide Instructional Programs



Title I-A

Schoolwide Instructional Programs

Supplemental Instructional Programs

The Title I-A program is federally funded and designed to supplement instruction provided in the regular classroom as well as extended day/week/year by certified teachers. Subject to funding availability, Title I-A funded teachers are hired to provide instruction in the core subject areas. The Title I-A teacher provides a challenging and meaningful instructional program that will allow for low-performing students to reach at minimum, proficiency on State academic standard achievement and pass the State academic assessments. The Title I-A teacher shall also use effective, scientific, research-based, instructional strategies that meet the needs of students by providing an enriched and accelerated curriculum. These teachers are also responsible for attending professional development opportunities that will address student needs.

Title I-A teacher assignments are in the following supplemental instructional areas:

Supplemental Instructional Programs

- Reading
- Math
- Science
- English
- Social Studies/History/Economics
- Extended Day/Week/Year Tutorial/Summer Programs
- Private Non-Profit Schools' Title I-A Tutorial Program

Private Non-Profit School (PNP) Programs

Title I-A eligible students attending private non-profit schools may receive Title I-A services if the school they attend wishes to participate in the program. Funding for services to private campuses is based on the number of students whose family income meets the guidelines established by the Federal government for the free or reduced lunch program. Supplemental educational services are provided to those students with the greatest academic need. The program participants must reside within the District's attendance area.

Federal and Support Programs' Directors and staff consult with each private school regarding the services that will be provided prior to the start of the new school year. Subject to funding availability, services can take various forms such as part-time Title I-A tutors, computer assisted instruction, extended day/week/year programs. The District maintains control of all funds allocated to participating private-non-profit schools. Participating PNP Schools follow:

Participating PNP Schools

First Baptist School

Guadalupe Regional Middle School

St. Joseph Academy

St. Mary's Catholic School

Episcopal Day School

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PARENT AND FAMILY ENGAGEMENT: TITLE I-A

As stated in the Every Student Succeeds Act (ESSA), Districts shall provide family engagement opportunities to parents of children participating under a Title I-A funded program.

Purpose

The purpose of the Parent and Family Engagement Department is to educate parents by providing them with the skills and tools necessary to motivate their children to obtain academic success and become productive, self-driven citizens in a multi-cultural society. Through district and campus trainings parents realize that family involvement in their children's learning is the critical connection that will help their children achieve a high-quality education.

Mission Statement

The mission of the Parent and Family Engagement Department is to educate parents by providing them with the skills and tools necessary to motivate their children to obtain academic success and become productive, self-driven citizens in a multi-cultural society.

District Responsibilities

A shared responsibility between the **District**, the **Campus**, and the **Parents** is essential for high student performance. The ESSA requires activities must be planned and implemented with meaningful consultation with parents of participating children. District responsibilities include:

1. Written Parent and Family Engagement Policy
 - Describes HOW the policy will be developed with, agreed upon with, and distributed to parents of participating children.
 - Describes HOW parents are involved in the development of the Title I-A planning process of school review and improvement.
 - Describes HOW technical assistance will be provided to schools' and parents' capacity for strong family engagement.
 - Describes HOW family engagement activities will be integrated and coordinated with other program family engagement activities.
 - Describes HOW, with the involvement of parents, an annual evaluation will be conducted to determine if there has been an increase in parental participation and whether there are barriers to greater participation, particularly by parents who are disabled, limited English proficient, limited literacy, economically disadvantaged or are of any racial or ethnic minority background.
 - Describes HOW the results of the evaluation will be used in designing strategies for school improvement and revising, if necessary, the parental engagement policies.

2. Technical assistance to Title I-A schools to implement family engagement requirements and establish program improvement processes.
3. Building the capacity for family engagement
 - Information to parents on the school, parent programs, student programs, and school wide authority in the primary language used in the home.
 - Enable parents to play four key roles in their children’s learning:
 - Teacher – help their child at home
 - Supporter – contribute their skills to the school
 - Advocate – help their child receive fair treatment
 - Decision Maker – participate in joint problem-solving with the school at every level

Campus Responsibilities

1. Written School Parent and Family Engagement Policy
 - a. Describes HOW it will be developed with, agreed upon with, and distributed to parents of participating children.
 - b. Describes HOW the policy will be carried out.
 - c. Describes HOW access will be provided to ensure equal access for all parents of participating children, including parents with limited English proficiency or with disabilities.
 - d. Describes HOW an annual meeting of parents will be convened to discuss school wide or targeted assistance programs and their rights to be involved.
 - e. Describes HOW regular meetings will be held and how meetings will be flexible to ensure parent participation.
 - f. Describes HOW parents will be involved in the school plan, Title I-A programs, and the family engagement policy.
 - g. Describes HOW parents will be provided information on Title I-A, school performance, students’ individual assessments, school curriculum, and how parents will be given timely responses to the suggestions.
 - h. Policy must be updated periodically to meet changes, needs of parents and the school.
2. School-Parent-Student Compact
 - Developed jointly with parents of participating students.
 - Describes responsibilities of the school and the parents to improve student performance and the means by which to do so.
 - Describes how on-going communication will occur, at a minimum, parent/teacher conferences, progress reports, access to staff.

- Parent signature is strongly encouraged.
 - Elementary campuses must conduct and Parent-Teacher conference to review the School-Parent-Student Compact.
3. Building the capacity for parental involvement
- Coordination with other programs, activities, and the community
 - Information provided in the language parents understand
 - Materials provided for parents to work with students at home
 - Parent activities, such as parent resource centers
 - Parent programs, such as an adult literacy program
 - Provisions for transportation and child care, as appropriate
 - Training teacher and parents
4. Conduct Annual Title I-A Meeting
- Convene an annual meeting, at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation under Title I-A, explain the requirements of this part, and the right of the parents to be involved.

Campus Parent and Family Engagement Meetings

Campus family engagement meetings/activities are planned and conducted by the Campus Parent Liaison, other Campus Staff and the District Parent Trainer. Meetings and activities should be meaningful and based on the school's needs assessment for the improvement of student academic and compliance of Title I-A requirements.

District-wide Parent and Family Engagement Activities

District-wide parent meetings/activities are planned and coordinated by the Parent and Family Engagement Department.

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SUPPORTING EFFECTIVE INSTRUCTION: TITLE II-A

Purpose

The purpose of Title II-A is to increase student achievement consistent with the challenging State academic standards; improve the quality and effectiveness of teachers, principals, and other school leaders; increase the number of effective teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and provide low-income and minority students greater access to effective teachers, principals, and other school leaders. The intent of the funding is to support educators in their work in an effort to improve the overall quality of instruction and ensure equity of educational opportunity for all students. The intent and purpose of TII-A can be accomplished through the following three areas of focus:

- 1. Recruiting and Retaining Effective Teachers and Principals**
- 2. Professional Development and Educator Growth**
- 3. Other Evidence-Based Activities**

1. Recruiting and Retaining Effective Teachers and Principals

Developing and implementing strategies and activities to recruit, hire, and retain effective teachers and principals. These strategies may include (a) providing monetary incentives such as scholarships, signing bonuses, or differential pay for teachers in high-need schools; (b) reducing class size; (c) recruiting teachers to teach special needs children, including students with disabilities; (d) recruiting effective paraprofessionals and teachers; (d) providing those paraprofessional with alternate routes to obtaining teacher certification; (e) school principal support; (f) teacher leadership; (g) educator induction and mentorship programs.

2. Professional Development and Educator Growth

Providing high quality professional development opportunities for teachers and principals in the following areas: 1. Assessments and Data analysis; 2. Career Readiness Education; 3. Child Sexual Abuse Prevention; 4. Early Childhood Instruction; 5. Effectively Teaching Children with Disabilities; 6. Effectively Teaching English Learners; 7. Evaluation Support Systems; 8. Evidence-Based professional development; 9. School Library Programs; 10. Supporting Students Affected by Trauma and/or Mental Illness; 11. STEM-Focused Professional Development.

- Classroom practices - Providing training to improve teaching practices and student academic achievement through (a) effective instructional strategies, methods, and skills, and (b) the use of challenging State academic content standards and student academic achievement standards in preparing students for the State assessments.
- Carrying out programs and activities that are designed to improve the quality of the teaching force; such as innovative professional development programs that focus on technology literacy.

- Carrying out professional development activities that are designed to improve the quality of principals and superintendents, including the development and support of academies to help them become outstanding managers and educational leaders.

3. Other Evidence-Based Activities

Title II-A other evidence-based allowable activities can be categorized into the following two categories:

1. Reducing Class Size to improve student achievement. The District may be required to provide evidence of class-size reduction to the degree intended (i.e. from 26 students to 22) to improve student outcomes.
2. Carrying out other evidence-based activities to the extent the State determines that such evidence is reasonably available and identified by the local educational agency that meet the purpose of Title II-A.

Stakeholder Input and Engagement

An LEA is required to engage in continued consultation with stakeholders who must include the following:

- Parents and Students
- Teachers
- Principals and school leaders
- Specialized instructional personnel
- Community-based organizations
- Others with relevant and demonstrated expertise

Allocation of Funds

Allocations for Title II-A are based on a statutory formula basis and are utilized to pay for middle and high school certification stipends, travel (in-district and out-of-district) for training purposes and consultants. Allocations for services to private non-profit schools include a proportional share of district set aside funds. Title II-A funds are currently being utilized for the following activities:

Employee Travel

Title II-A funds may be used for registration fees and other travel expenses allowable under federal, state and local guidelines. A professional leave request must be submitted a minimum of fifteen (15) days prior to the activity for in-district travel and thirty (30) days for out-of-district. Out-of-State travel should be minimal, reasonable, and meet the intent and purpose of the program. A TEA travel request form may be obtained from the Special/Federal programs office and written justification form will be maintained locally and made available to TEA upon request. Title II-A travel accounts follow:

255-21-6411-00-XXX-Y-24-0F2-Y	In-District Travel
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255-21-6411-23-XXX-Y-24-0F2-Y	Out-of-District Travel
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Stipends

Title II-A funds may be used to pay teachers to attend trainings held outside their usual working hours. Stipends are paid at the rate approved by the BISD Board of Trustees. Following each training, sign-in sheets along with a composite from listing the participants and the amount to be paid to each participant. In addition, core area stipends are also paid with Title II-A and are paid on a monthly basis. These accounts follow:

255-13-6117-00-XXX-Y-24-0F2-Y	Training Attendance Stipend
255-13-6117-00-XXX-Y-24-0D0-Y	English Lang. Arts/Reading (Core Area Stipend)
255-13-6117-00-XXX-Y-24-0D1-Y	Mathematics (Core Area Stipend)
255-13-6117-00-XXX-Y-24-0D2-Y	Science (Core Area Stipend)
255-13-6117-00-XXX-Y-24-0D3-Y	Social Studies (Core Area Stipend)

Consultants

Consultant **services** requests must be submitted to Special Programs a month in advance of the activity taking place. All consultants must be on the District’s approved vendor list and the back-up documentation should include the presenter’s vita, information describing the training that will be taking place and the CIP/DIP activity as well as the CNA documentation.

255-13-6216-00-XXX-Y-24-0F2-Y	Consultants
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Title II-A Activities

Activities carried out under Title II, Part A must be aligned with the challenging State/Private Non-Profit schools’ academic standards (see examples referenced in the table that follows):

6100 Payroll Costs	6200 Professional and Contracted Services	6300 Supplies and Materials	6400 Other Operating Costs
Possible Activities: Extra-Duty Pay for TII-A Professional Development Outside of the Regular School Day/Week; Incentive Pay;	Possible Activities: TII-A Professional Development; and Title II-A Program Development	Possible Activities: Supplies and Materials for TII-A Professional Development; Educator Recruitment Materials	Possible Activities: Professional Development Conferences; Off-Site Professional Development

Examples of Activity Documentation:	Examples of Activity Documentation:	Examples of Activity Documentation:	Examples of Activity Documentation:
Training Certificate; Agenda/Sign-in Sheet; Job Description; Extra-Duty Pay Request Form; PD Evaluations	Executed Contract; Statement of Work; Quote; Purchase Requisition; Invoice; Receipt; Training Agenda; Training Materials;	Purchase requisition; Purchase order; Quote; Invoice, Receipt, Training Agenda; Training Materials; Sign-in, PD Evaluations	Travel requisition, Training Certificates; Training Agenda; Training Materials, Out-of-State Justification Form, PD Evaluations

Supplement, Not Supplant

The Supplement, Not Supplant provision does apply to this grant program. The program guidelines ensure compliance with the Federal fiscal requirement. The purpose of the requirement is to ensure that the level of State and local support for programs remains at least constant and is not replaced with Federal funds. These Federal funds are used to supplement (add to, enhance, to expand or increase) the funds available from non-federal sources, and not to supplant (replace or take the place of) the existing non-federal funds.

1. Title II-A funds shall not be used to provide services that the District is required to provide under Federal, State or Local laws/policies.
 - a. Salary expenditures for staff required by Federal, State, or Local policy shall not be paid from Title II-A funds. For example, teacher FTEs that meet the State’s student-teacher ratio for specific grades will not be funded with Title II-A monies. Excess teacher units, if any, may be eligible for payment through Title II-A.
 - i. Documentation shall include a report that reflects the teacher units, if any.
 - b. Salary expenditures for staff required by local policy shall not be paid from Title II-A funds. Excess staff units, if any, may be eligible for payment through Federal funds.
 - i. Documentation shall include Board minutes or local policy reflecting the staffing requirement and a report that reflects the staff units throughout the District mandated by the local minutes/policy and the excess units, if any.
 - c. Title II-A funds shall not be used to pay for State required activities, such as state-mandated assessments.
 - i. Documentation shall include purchase orders for State required activities. The purchase orders shall reflect that non-federal funds were used to pay for the expenditures.
2. Procedures for determining that a school participating in a school-wide program is using Federal funds available only to supplement the amount of funds that would, in the absence of ESSA Federal funds, be available from non-federal sources for the school (including funds needed to provide services for children with special needs and children with limited English proficiency).
3. Procedures for determining supplement, not supplant when State or local funds are no longer available. Title II-A funds shall not be used to provide services that the District is required to make available under other Federal, State or Local laws (Board Policy).

Private Non-Profit School Participation

Private non-profit schools are eligible to participate in the Title II-A Program. Educational services for private school children, teachers, and other educational personnel shall be equitable in comparison to services provided to public school children, teachers and other educational personnel. Allocations for equitable services are based on the total enrollment of the campus and these funds are used to provide high quality professional development activities for teachers and staff members based on the identified needs of each campus. Subject to funding availability, six private non-profit schools participate in the program. These are the following:

Participating PNP Schools

**First Baptist School
Guadalupe Regional Middle School
St. Joseph Academy
St. Mary's Catholic School
Episcopal Day School**

Meaningful Consultation

Educational services shall be provided in a timely manner. To ensure timely and meaningful consultation, BISD consults with the appropriate school officials. Timely and meaningful consultation are critical requirements that can be found throughout the ESSA statute. It is important for districts to ensure that processes and procedures include elements that document timely and meaningful stakeholder consultation in the process associated with planning, implementing, and evaluating the Title II-A program.

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STUDENT SUPPORT AND ACADEMIC ENRICHMENT PROGRAM: TITLE IV-A

The Elementary and Secondary Education Act of 1965, as authorized by the Every Student Succeeds Act (ESSA) of 2015, established Title IV-A, the Student Support and Academic Enrichment Grant Program (SSAE). The overarching goal of Title IV-A, is to increase the capacity of state education agencies, local education agencies, campuses, and communities to meet the following three goals:

1. Provide all students access to a well-rounded education
2. Improve academic outcomes by maintaining safe and healthy students
3. Improve the use of technology to advance student academic achievement

Campus and District Administration meet to review and discuss the needs of the District, and campus goals, activities, and strategies. Needs identified are included in the DIP/CIP.

Local Education Agency Requirements

1. Local education agencies (LEAs) must complete and submit to TEA the ESSA Consolidated Federal Grant Application to receive ESSA Title IV-A, program allocations.
2. An LEA may, if it chooses, apply for funds in consortium with one of more surrounding LEAs and combine funds each LEA receives.
3. LEAs receiving \$30,000 or more shall conduct a comprehensive needs assessment of the access to, and opportunities for, a well-rounded education for all students. School conditions for student learning; and access to personalized learning experiences supported by technology.
4. LEAs receiving less than \$30,000
 - a. Are NOT required to conduct a comprehensive needs assessment and
 - b. Are only required to focus on one of the three Title IV-A, content areas: 1) well-rounded education,
2) safe and healthy students, and 3) effective use of technology.
5. LEAs may transfer Title IV-A, funds to another federal allocation.

Stakeholder Input and Engagement

An LEA is required to engage in continued consultation with stakeholders who must include the following:

- Parents and Students (DEIC)
- Teachers (DEIC)
- Principals and school leaders (DEIC)

- Specialized instructional personnel
- Community-based organizations
- Others with relevant and demonstrated expertise
- Local government representatives

Cross Cutting Authorized Topics

Cross cutting topics support one or more content areas or outcomes within or across content areas that support the intent and the purpose of Title IV.

Title IV-A Program Definitions

Well-rounded education	Courses, activities, and programming in subjects such as English, reading or language arts, writing, science, technology, engineering, mathematics, foreign languages, civics and government, economics, arts, history, geography, computer science, music, career and technical education, health education, physical education, and any other subject, as determined by the state or LEA
Accelerated learning opportunities	Programs and/or exams, such as dual credit, concurrent enrollment, Early College High Schools, and Advanced Placement (AP) and International Baccalaureate (IB) exams, that provide opportunities for students to earn post-secondary credit while in high school,
Accelerated learning programs	Programs that offer post-secondary-level courses accepted for credit at institutions of higher education (including dual credit or concurrent enrollment programs and Early College High Schools) or post-secondary-level instruction and examinations that are accepted for credit at institutions of higher education (including AP and IB programs)
Professional development	Strategies for providing educators (including teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, and, as applicable, early childhood educators) with the knowledge and skills necessary to enable students to succeed in a well-rounded education and to meet the challenging state academic standards. For more details: See Texas Education Agency ESSA Provisions and Assurances, pages. 4-5.

Distribution of Funds

Each state will receive an allocation from the flexible block grant based on the Title I-A funding formula. Using the same Title I-A formula, states will then allocate funds to school districts.

Districts must conduct a needs assessment and must then spend 20 percent of its grant on safe and health school activities and 20 percent on activities to provide a well-rounded education program. The remaining 60 percent of the money can be spent on all three priorities, including technology. However, there is a 15

percent cap on spending for devices, equipment, software and digital content.

Supplement, Not Supplant Requirement

Supplement, not supplant provisions require a school district to use state or local funds for all services required by state law, State Board of Education (SBOE) rule, or local policy and prohibit those funds from being diverted for other purposes when federal funds are available. Title IV-A, funds:

- Must supplement—add to, enhance, expand, increase, extend—the programs and services offered with state and local funds;
- cannot be used to supplant—take the place of, replace—the state and local funds used to offer those programs and services; and
- expended to benefit the intended population defined in the authorizing statute, rather than being diverted to cover expenses that an LEA would have paid out of other funds in the event the federal funds were not available.

Preliminary Checklist for Allowable Activities and Use of Funds

Each LEA must be able to respond appropriately to and maintain documentation of the following:

- How is the expenditure reasonable and necessary to carry out the intent and purpose of the program and content area(s) of Title IV-A?
- What specific need identified in the comprehensive needs assessment will the expenditure address?
- How will the expenditure be evaluated to measure a positive impact on student achievement?
- How is the expenditure supplemental other non-federal programs?

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