THE COUNCIL OF CHIEF STATE SCHOOL OFFICERS

The Council of Chief State School Officers (CCSSO) is a nonpartisan, nationwide, nonprofit organization of public officials who head departments of elementary and secondary education in the states, the District of Columbia, the Department of Defense Education Activity, and five U.S. extra-state jurisdictions. CCSSO provides leadership, advocacy, and technical assistance on major educational issues. The Council seeks member consensus on major educational issues and expresses their views to civic and professional organizations, federal agencies, Congress, and the public.

COUNCIL OF CHIEF STATE SCHOOL OFFICERS
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Supports & Interventions FAQs

The School and District Improvement (formally known as Supports & Interventions) State Collaborative on Assessment and Student Standards (SDI SCASS) of the Council of Chief State School Officers (CCSSO) focused its 2015-2016 work on defining effective school improvement strategies and practices. To support themselves and other state education agency staff, the SDI members created this series of Frequently Asked Questions (FAQ) documents to define questions, highlight examples, and include any considerations that SEA staff may need to consider as they plan and implement policies and strategies. The FAQs are organized by topic.

The SDI SCASS is considering and reviewing the key components of the Elementary and Secondary Education Act (ESEA) and ESEA flexibility to be retained (and possibly even strengthened) for future state work. Additionally, the new version of ESEA, the Every Student Succeeds Act (ESSA), provides significantly more authority directly to state education agencies (SEAs), and the SDI members seek to

- Gather various approaches from states in one resource,
- Highlight lessons learned and considerations, and
- Codify practices and policies that appear effective.

SDI members are looking carefully at their current work and have determined four critical components for supporting low-performing schools and districts:

1. Identification of Schools (including the lowest performing schools and schools with persistently underperforming subgroups)
2. Differentiated Supports and Interventions
3. Transfer of Funds and Resource Alignment
4. Family and Community Engagement

State-specific examples are provided and hyperlinked (if available). The SDI SCASS hopes these documents will be updated as additional guidance from the U.S. Department of Education is released and as SEAs implement successful practices. Please note that regulations from the U.S. Department of Education are pending and could adjust elements of the law that are discussed within these FAQs. The state education agencies that participated in the creation of these resources include Arkansas, Maine, Michigan, Mississippi, Oregon, South Dakota, Utah, Washington, and Wyoming. Staff from the Illinois Center for School Improvement and Virginia’s state education agency also contributed.
Introduction

SEAs receive millions of dollars in federal funds each year to support school and district improvement efforts. Determining how to use those funds effectively remains a priority for many SEA leaders. In this FAQ document we address issues related to the effective use of federal funds, including aligning resources and creating the conditions that promote effective spending at the local level.

Due to the complex nature of questions related to funding, staff from the Center on School Turnaround at WestEd and the Federal Education Group also reviewed and contributed to this portion of the FAQ documents.

1. What major sources of federal funding are available to support school and district improvement efforts?

SEAs can use many federal grants to support school and district improvement efforts. Section 1003 funds must be used exclusively for school improvement activities. Other ESSA grants that can support school and district improvement activities include Title I, Part A, Title II, Part A, Title III, Part A, and Title IV, Parts A and B. Grants outside of ESSA, such as IDEA (specifically the State Personnel Development Grants) and Perkins, can also be used to support this work, and in some states, state funds are available for improvement efforts. Increasingly, SEAs are beginning to align resources and “braid” funding streams together to increase alignment and more effectively use resources.

2. How can SEAs foster cross-office collaboration within the SEA?

Typically, many different SEA offices work on school improvement-related issues such as a school improvement office, a federal programs office, and a teaching and learning office among others. Many SEAs are actively working to increase collaboration among these and other offices to help staff share expertise, share data, and reduce duplication. This not only helps break down silos within an SEA, it also ensures the SEA as a whole approaches school improvement issues consistently.

State Examples:

- Review and approve grant applications with representatives across multiple departments (Mississippi).
- Use of a consolidated funding application (Utah)
- Cross-agency teams complete monitoring visits together (Indiana).
- Redesigned SEA offices and job-functions to encourage better coordination at both the SEA and LEA level. SEA now has an office of consolidated planning and monitoring – which encompasses many coordinated functions (Tennessee).
Ensuring cross-office access to initial LEA grant budget data. For example, using the Indistar® online system, updates are uploaded to keep all process documents in one place and connected to the plans, and are accessible to several divisions within the SEA (Arkansas).

Technical assistance is delivered by cross-office teams (Mississippi).

The same policies and regulations are required for all state-identified and federally-identified schools/LEAs, which lessons possible confusion at both the LEA level and within the SEA (Washington).

Considerations:

Cross-office collaboration works best when aligned to state priorities, so the chief and other senior leaders have an important role in determining what collaboration should look like, both from a policy and a management perspective.

In addition to the state examples above, additional ideas include using staff from multiple offices to address a common issue, such as:

- Providing cross-office supports to a struggling school district,
- Developing technical assistance on effective school improvement practices aligned to state accountability priorities (for example, Title I, IDEA and school improvement staff could collaborate on guidance around early interventions for struggling students), and
- Reviewing how LEAs and schools spend federal funds, and determining where improvements can be made at both the SEA- and LEA-level to foster effective spending.

An SEA’s cross-office collaboration sets a model for LEAs and schools to follow.

SEA and LEA accounting systems may be antiquated and make it extremely difficult to manage consolidated or braided funding.

3. How can an SEA promote better planning and more effective spending of federal funds at the LEA level?

Several SEAs recommend shifting the focus of grant applications towards defining what an LEA and/or school wants to do and then figuring out what sources of funds could be used, as opposed to having LEAs apply for funds without a concise plan for improvement or without an awareness the LEAs/schools needs. In order to do this, SEAs may need to provide more education and advocacy to LEAs upfront about the purpose of grants, how to align resources, when to use the dual purpose of funds, etc. SEAs influence local planning and spending of federal funds through:

- SEA spending policies on federal funds, including policies reflected in SEA-developed technical assistance tools and spending guidance, and
- The annual LEA-to-SEA plan/application for ESEA funds, which SEAs must approve before LEAs can receive most of their federal funds.
These two levers are inextricably linked and influence each other, and have a significant impact on how schools and LEAs design school improvement programs and how they spend federal funds. SEAs have several important opportunities under ESEA, and other federal rules, to use these levers with school improvement in mind as discussed in the following sub-questions.

State Examples:

- Local school board training, including fiscal management (Arkansas).

Considerations:

- Large district divisions may operate in silos, while small districts may have one person in charge of all funds and the grant application process. It may be useful for the SEAs to request coordination across LEA divisions during the application process.

- SEA could provide promising practice examples from other LEAs to spread practices within the state.

- Only provide a minimal amount of funds for the planning year of a grant application, and reserve the larger grant amounts for the implementation years – once the needs assessment is complete and a coordinated plan is developed.

- Keep an eye on the eventual decrease or removal of funds, by keeping LEAs and schools focused on the phase out process and the desire for sustainability from the outset.

- Encourage the use of program/partner audits and an analysis of all current resource allocations to examine what resources are currently being provided to the LEA/school and if they are aligned to the specified needs and intended plan.

Considerations:

- Small districts may be at a disadvantage due to not having the funds to hire a grant writer, or having a dedicated writer on staff. Ensure that the application and plan review process includes some mechanisms to truly evaluate a well-thought out plan, vs a well-written plan.

- Small districts may not qualify for some grant opportunities due to their small n-size, consider providing preferential priorities, or a dedicated pool of grant funds, to small districts.

- Consider giving preferential priorities to districts with stronger needs.

3a. How does ESEA impact SEA-spending policies on federal funds, including state-developed technical assistance and guidance on federal program spending options?

ESEA clarifies, and in many cases expands how federal funds can be spent. For example, ESEA clarifies that Title I schoolwide schools can use strategies like counseling, mentoring, and improved access to advanced coursework to support students (these are only a few examples); and Title II Part A’s uses of funds have been significantly expanded. These clarifications and/or expansions provide SEAs with an important opportunity to reassess current SEA-level spending policies and guidance, in order to ensure they are:
Aligned with ESSA, and

Do not inadvertently impose restrictions that go beyond what federal law requires and perhaps even run counter to state accountability goals.

For example, while not required by NCLB, under NCLB many states imposed spending restrictions on Title I that prohibited LEAs from using Title I funds on non-academic student supports (such as counseling or dropout prevention), or prohibited LEAs from using Title I funds on subjects such as music or science (many states limited Title I spending to reading and math). ESSA makes it clear that Title I funds can be used on a wide variety of activities, provided the activities are linked to school and student needs. The opportunity to spend funds on a wider array of activities could help drive more effective spending in struggling schools.

In addition, ESEA's new accountability requirements, in particular, the new indicator of school quality or student success (such as student engagement or school climate), raises the importance of alignment between an SEA's spending policies on federal funds and the state's accountability system. For example, if under NCLB a state did not permit Title I funds to be spent on school climate supports, and the state has selected school climate as its new accountability indicator of school quality, it will be important for the SEA to ensure Title I (and other federal funds) can be used to support activities related to that indicator.

Considerations:

- The SEA could use a cross-office team to ensure that SEA-spending policies – both formal and informal – are consistent with both ESEA and SEA accountability and educational goals.
- The SEA could determine how it will revise, or draft new policies, where formal policies must be changes, as well as how to identify (and change where necessary) informal policies.

3b. How can state-developed technical assistance, guidance, and tools promote improved spending on school improvement activities at the school and district level?

While SEAs often put out guidance explaining the technical rules that apply to federal funding sources – such as Title I's ranking and serving requirements, or how equitable services for private school students work in various federal programs – it is less common for SEAs to put out guidance explaining how one or more federal funding sources can support an effective activity. Activity-based guidance can help LEAs more easily: 1) identify effective (and/or evidence-based) practices, and 2) understand what federal funding sources might be available to support a particular practice or initiative.

For example, if an SEA wanted to encourage its districts to implement strategies to combat chronic absenteeism as part of school improvement efforts, an SEA could put out guidance that:

1. Identifies effective (or evidence-based) practices that can help reduce chronic absenteeism,
2. Provides ideas or suggestions on how schools or districts could implement those practices, and
3. Describes how schools or districts can support those practices with federal funds.
In terms of aligning specific activities to federal funding sources, for this example, an SEA could highlight that:

- **Title I, Part A can be used to support** counseling, school-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students’ skills outside the academic subject areas; as well as implementation of a schoolwide tiered model to prevent and address behavior concerns, along with other academic and non-academic supports that can improve student engagement and connectedness, including teacher professional development and family engagement.

- **Title II, Part A can be used to support** professional development activities that deliver in-service training for school personnel in techniques needed to help educators understand when and how to refer students affected by trauma or at risk of mental illness; forming partnerships between school-based mental health programs and public or private mental health organizations; and addressing issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism; using data effectively (which could include how to use data to identify students at-risk of chronic absenteeism), and identifying early and appropriate interventions to help struggling students.

- **Title IV, Part A can be used to support** college and career-guidance and career awareness programs, programs that use music and art to support student success, engagement and problem solving, supporting the participation of low-income students in non-profit competitions related to STEM, environmental education, school-based mental health programs, programs that provide mentoring and school counseling to all students, programs that establish learning environments and enhance students’ effective learning skills, bullying and harassment prevention.

- **IDEA, Part B can be used to support** school climate initiatives to address the needs of students with disabilities, warning systems and progress monitoring for students with disabilities, academic and behavioral supports for children not identified for special education but who need additional academic and behavioral support to succeed in a general education environment if done as part of the coordinated early intervening services (CEIS) set-aside.

Not only can activity-based guidance be practical and useful for LEAs, but the guidance-development process can be helpful to SEAs. This is because when guidance is developed by a cross-office SEA team, it fosters collaboration and ensures that SEA personnel are “on the same page.” In addition, specific, user-friendly guidance can result in LEAs submitting better applications for federal funds to the SEA because LEAs have a better understanding of both good practices and how federal funds can be used. This can in turn result in faster review and approval processes by SEA staff of LEA applications. Finally, if an SEA decides to issue guidance that explains how multiple federal funding sources can be used for a specific-activity, it can help LEAs “braid” several funding sources together, which leverage funds resulting in a greater impact on students than if federal funds are used in silos.

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1. The extent to which these activities are available to all students in the school, or only to certain at-risk students, depends on whether a school operates a schoolwide program model or targeted assistance model.

2. For SEAs that are interested in developing activity-based guidance, additional information is available in *Maximizing ESSA Formula Funds for Students: State Readiness Self-Assessment*, pages 6-7.
State and Federal Examples:

- **Letter on Using Federal Funds to Support Humanities and Arts Education for School Year 2016–2017** (2016) (U.S. Department of Education. NOTE: the ESEA version discussed in this guidance is NCLB, not ESSA)

Considerations:

- Spending guidance for Section 1003 funds would be particularly helpful since those funds may only be spent on activities supported by the top three tiers of evidence, as defined by ESEA. Guidance could address how to determine if an activity meets ESEA’s evidence threshold.

- SEA leadership could determine which activities the SEA will highlight when developing guidance, which SEA offices and staff will participate in the guidance development process, and how leadership will ensure alignment to SEA policies, goals, and priorities.

**3c. How can SEA-designed application and approval processes for federal funds, such as the annual LEA-to-SEA application for ESSA funds, and other applications (such as those for 1003 School Improvement funds), help drive more effective spending and educational practices?**

All of the major state-administered programs – such as Section 1003 School Improvement, Title I, Part A, Title II, Part A, etc. – require LEAs to apply to their SEA to receive funding. SEAs have substantial discretion over the design of these applications, as well as the design of the review and approval process. This provides an important opportunity and leverage point for SEAs.

Most state-designed application and planning tools are designed around specific funding sources, rather than goals, needs, or activities. Several SEAs are shifting the focus of grant applications towards defining what an LEA and/or school wants to do first, and then determining which funding sources will support those activities.

If an SEA is interested in a needs-oriented planning and spending approach, the SEA will likely need to:

- Redesign the LEA-to-SEA applications for ESEA funds,
- Provide technical assistance to LEAs about how to conduct effective needs assessments and how to align spending to those needs, and
- Redesign the review and approval process to include cross-office SEA teams with a variety of perspectives, information, and expertise.
State Examples:

- Redesigning application processes to encourage LEA focus first on planning, then on spending (Tennessee and Mississippi).

Considerations:

- Consider how the SEA might engage with LEAs to learn their perspectives, concerns, and ideas for redesigning LEA-to-SEA application process for federal funds.

- Determine the role the SEA wants to have in LEA decision-making and ensure the design of the application is consistent with this role.

- Consider ways the application design could encourage authentic coordination by both LEA and SEA staff.

- Analyze whether a differentiated application approach (i.e. requiring more information from certain LEAs and less from others) could better meet SEA and LEA needs.

- Determine how the SEA will ensure that the entirety of an application process (including guidance embedded in the application, drop-down menus or pre-populated information, narratives, review rubrics, etc.) are aligned to both ESEA and SEA policy to avoid inadvertent funding restrictions that can limit the reach of federal funds.

4. What are the levers SEAs can use to monitor implementation and encourage the effective use of funds?\(^3\)

SEAs are required to monitor the LEAs (and other subrecipients) they award federal education funds to ensure they:

- Use federal funds for authorized purposes,

- Comply with federal requirements, and

- Achieve performance goals.

Recent changes to federal grant rules (known as the Uniform Grant Guidance) clarify that monitoring is a broad term that covers a variety of oversight activities, including activities such as technical assistance. In addition, SEAs must now tailor their monitoring activities to each subrecipient’s risk of non-compliance. The more likely it is a subrecipient will not comply with federal requirements, the more monitoring the SEA is expected to perform.

Within these parameters, SEAs have wide-discretion as to how to design monitoring and other oversight processes. Depending on how monitoring is designed, it can provide SEAs with an important opportunity to engage in important conversation about school and student performance. While monitoring may result in SEAs sanctioning an LEA, such as where funds are used for ineligible students,

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\(^3\) Portions of this section are paraphrased from Using Federal Education Formula Funds for School Turnaround Initiatives: Opportunities for State Education Agencies, pages 11-12.
some of the most constructive oversight opportunities come through deeper engagement with LEAs, rather than punitive back-end sanctions.

For example, Title I, and other federal funding sources, can be used for student and school supports to combat chronic absenteeism (see Question 3b above). If an LEA or school facing this problem did not use federal funds, the SEA could explore with the district whether it was aware of the various spending options and whether those options might make sense in a given setting.

The purpose of this conversation would not necessarily be to determine whether a district made the “right” choice – for example, the LEA could be using state or local resources to address this need, or perhaps is focusing federal funding on other priorities it believes is more pressing. Instead, the conversation is an important tool the SEA can use to ensure LEAs know their full options and are using federal funds strategically.

**State Examples:**

- SEA works with LEA to explore other sources of grant funding and community resource supports (Arkansas).
- SEA rarely approved School Improvement Grant (SIG) funding requests for full time staffing positions or technology (due to the inability for LEAs to maintain staff positions without the grants and the tendency to purchase new technology products and systems without addressing the root cause of achievement issues) (Virginia).
- Reduce the next year’s funding or pull a grant, if intended steps were not realized or plan was not implemented with fidelity (Arkansas, Michigan, Oregon, and Virginia).
- Monitoring reviews compare reality to the original applications to ensure that implementation is aligned, or to ask detailed questions about what occurred to warrant the changes (Michigan).
- The improvement division completes a fiscal review of the plan and progress and a consolidated program review is also completed to double check the implementation of proposed strategies (Washington).
- Proposed regulation – The final budget for a grant application would be determined after the SEA approves the plan (Washington).

**Considerations:**

- Analyze which staff and offices have the expertise to lead conversations about the content of educational programs and school improvement (as opposed to technical requirements that attach to funding streams), and to evaluate school and LEA actions. This analysis should inform the SEA’s approach to monitoring and oversight. For example, if an SEA does not feel it currently has sufficient capacity, it may wish to engage outside experts when conducting qualitative monitoring.
- Determine the role the SEA wants to have in local decision-making. For example, will the SEA question activities that are permissible, but in the SEA’s view, not the most effective?
• Consider including a column in a grant application that includes other sources of funds (including other SEA and LEA funds or community resources).

• Planning year grants should only cover the costs of the needs assessment and collaboration for planning.

• If applying for year 1 funds (with no planning year), the SEA could include questions in the plan templates and application about principal sustainability to ensure that the principal has the competencies to lead school.

• If a principal transition is likely, the SEA could encourage or require the LEA/school to apply for a planning year – otherwise the principal is not part of the plan creation and this disconnect can result in partial implementation of an incomplete plan.

• Use the authority SEAs have to pull or reduce funds if plans are not implemented with fidelity or funds are not used appropriately.

• Only approve continuation applications the prior year was implemented with fidelity and funding requests are based on data.

5. How could an SEA assess the impact and/or the effective use of funds?

While most SEAs complete an annual review cycle to monitor improvements in schools, SEAs have not regularly assessed the return on investment of funds. In a recent analysis of SEAs (Corbett & Redding, 2015), 29% of the responding SEAs noted that they try to assess the cost effectiveness and/or return on investment to some extent, but most reflected that this level of analysis was just beginning. Most SEAs that responded to the survey also noted that quarterly reports and reviews of school improvement plans were the primary forms of monitoring and analysis.

State Examples:

• Require schools and LEAs to present information on the impact of some grant funds to the state board of education (Arkansas and Mississippi).

Considerations:

• Determine what benchmark data would be useful at the beginning of an intervention effort to assess the impact of the strategy, practice, or program?

• If multiple efforts are being implemented simultaneously, determine if it possible to disaggregate which strategy, practice, or program results in the positive impact?

6. What are other questions that SEA staff should consider?

• What is the value add of additional dollars? What is the appropriate amount of additional support to positively impact a school and/or district?

• Are there additional state-provided funding streams that could be used to support this work?
How can the accounting/grant management divisions within the SEA better communicate with providing of supports and oversight?

**Additional Resources that may be useful:**


