Ohio Department of Education
Ted Strickland, Governor
Deborah S. Delisle, Superintendent of Public Instruction

Office of Federal Programs
CCIP Consolidated and CCIP ARRA
Frequently Asked Questions

The United States Department of Education has released funds under the American Recovery and Reinvestment (ARRA) Act. The four guiding principles behind the funds are

- ***Funding to save and create jobs***
- ***Improve student achievement through reform***
- ***Ensure that the one-time funds are invested wisely to sustain the reforms***
- ***Ensure Transparency and Accountability in reporting***

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ARRA Overview

1) What is the purpose of ARRA funds?

These funds will be provided in exchange for Ohio's commitment to advance essential education reform in four areas:

(1) Making improvements in teacher effectiveness and in the equitable distribution of qualified teachers for all students, particularly students who are most in need;

(2) Establishing pre-K-to-college-and-career data systems that track progress and foster continuous improvement;

(3) making progress toward rigorous college- and career-ready standards and high-quality assessments that are valid and reliable for all students, including limited English proficient students and students with disabilities; and

(4) Providing targeted, intensive support and effective interventions for the lowest-performing students

Resources:

- **Title I, Part A ARRA Guidance**
  www.ed.gov/policy/gen/leg/recovery/guidance/title-i.pdf
- **IDEA, Part B ARRA Guidance**
  https://ccip.ode.state.oh.us/DocumentLibrary/ViewDocument.aspx?DocumentKey=65771
- **CCIP Doc Library ODE-IDEA Guidance**:
  https://ccip.ode.state.oh.us/DocumentLibrary/ViewDocument.aspx?DocumentKey=1037
- **Using ARRA Funds to Drive School Reform and Improvement**
  https://www.ed.gov/policy/gen/leg/recovery/guidance/uses.doc

- **ODE Stimulus Updates**
  http://www.ode.state.oh.us/GD/Templates/Pages/ODE/ODEDetail.aspx?page=520
- **U.S. Department of Education Overview of ARRA**
  http://www.ed.gov/policy/gen/leg/recovery/index.html#apps
- **Non Regulatory Guidance on Fiscal Issues**
  http://www.ed.gov/programs/titleiparta/fiscalguid.doc

2) What is the priority for ARRA funds?

These funds should be used to improve results for all students, including early learning, extended learning time, use of technology, preparation for college and school modernization.

3) How will ARRA funding be distributed to districts?

Under the American Recovery and Reinvestment Act (ARRA) of 2009, Title I and a few other federal programs funds will be allocated by formula to eligible districts and community schools through the Ohio Department of Education's (ODE) Comprehensive Continuous Improvement Plan (CCIP) electronic application. There is a separate CCIP application for the ARRA funds. These funds were allocated in the FY2010 CCIP Funding Application on June 1. When the district/agency submits either the Consolidated Application or ARRA Application to ODE as ***Authorized Representative Approved*****,** it is considered to be substantially approved. From this date forward, legal obligations can be incurred for expenses as long as the budgets submitted by the district/agency meet the budget requirements for the use of funds. The earliest substantially approved date is July 1, 2009.

4) Which LEAs are eligible for Title I Part A ARRA funds?

An LEA is eligible to receive Title I, Part A ARRA funds if it is eligible under the statutory eligibility criteria established in sections 1125(a)(1) and 1125A(c) of the ESEA for the Targeted and Education Finance Incentive Grant (EFIG) formulas of Title I, Part A.

5) Will LEAs receive a regular Title I allocation available to draw down on July 1 in addition to the Title I allocation through ARRA?

Yes. The Title I Allocation received through ARRA is **in addition** to the regular Title I money that eligible LEAs will receive for Fiscal Year 2010. The date that funds become available to draw down is based on the date the LEA submits their application for approval, with the earliest date being July 1, 2009.

6) Will LEAs receive 50 percent of the ARRA funding now and 50 percent later on during the fiscal year 2010?

No. 100 percent of the ARRA funding has been allocated to the districts. No funds will be added. **The ARRA allocation is a onetime allotment that runs through September 30, 2011.**

7) Is the ARRA funding part of the regular CCIP Consolidated application that we currently use?

No, a separate CCIP "ARRA" application has been designed to house the funding. **Districts must change the status of the FY 2010 CCIP Consolidated Application to *Draft Completed Status* before putting the CCIP ARRA application into *Draft Completed Status*.** First submit the initial Consolidated Application as *Authorized Representative Approved* followed by the Title I ARRA Application so they can be reviewed in conjunction with each other.

These funds will be coded, reported and tracked separately from other federal funds. **The ARRA (stimulus funds) Application includes a Purchase Services details page for specific programs.** ARRA expenditures will be subject to higher levels of reporting and review. Recipients of these funds will need to maintain and report accurate, complete and reliable documentation of all ARRA expenditures

8) Are the ARRA reporting and accountability requirements the same as Title I Part A allocations?

There is an increased transparency in the ARRA funds. New codes are assigned to ARRA funds and recipients are required to maintain and report accurate, complete and reliable documentation of all ARRA expenditures. States must have an effective cash management process:

- Drawing down and flowing funds
- Oversight and monitoring responsibilities to ensure data quality and the proper expenditure of ARRA funds
- Uses of funds

ODE and local education agencies (LEAs) must submit reports (at least quarterly) on uses of ARRA funds. Minimum examples are expected to include:

- Uses of funds
- How funds are distributed
- Number of jobs saved or created
- Tax increases estimated to be averted because of funds
- Progress on four assurances
- Description of modernization projects and costs

Applications and other information must be made available to public and posted at www.recovery.gov. More detailed information on ARRA reporting instructions will be provided by ODE as the information becomes available.

9) What funds can we receive under the ARRA application?

Formula grants allocations for Title I Part A, IDEA Part B, Title I School Improvement Funds, McKinney-Vento Homeless Assistance (minimum 20 student requirement to receive the funds), Title II D and Early Childhood Special Education.

10) What is the obligation period for Title I Funds under ARRA?

The obligation period will be July 1, 2009, through September 30, 2011, (with approved carryover) for 27 months. www.ed.gov/policy/gen/leg/recovery/guidance/title-i.pdf

11) Will funding exist after 2011 to support expansion or additions to Title I programs that are implemented with the ARRA funds?

No. It is for this reason that ODE is encouraging districts to consider programs or services that can be implemented and paid for within the 27-month period. These funds should be invested in ways that do not result in unsustainable continuing commitments after the funding expires.

12). Will the district receive an automatic ARRA payment once the ARRA consolidated application is approved?

No. Because these are new funds to the district, there may not be a clear expenditure plan, so we would be placing districts at risk of not meeting federal requirements related to cash management if we simply sent funds forward. Districts will be able to request funding through the PCR tools established for ARRA funds. All ARRA consolidated formula funds will be treated this way.

13) Does the 15 percent carryover limitation on Title I funds apply to the ARRA Title I funds?

We are awaiting further guidance from the U.S. Department of Education.

14) Do the Title I, ARRA funds have the same set aside requirements as Title-I Part A Regular funds?

Yes. Program requirements for ARRA funds remain the same as Title I-Part A. ODE is awaiting guidance from the USDoE regarding waivers. ODE will then request waivers for the following: Lowering the poverty threshold from 40 percent to 25 percent for Buildings to be served as Schoolwide, Public School Choice and Supplemental Educational Services set asides.
http://www.ode.state.oh.us/GD/Templates/Pages/ODE/ODEDetail.aspx?page=520
http://www.ed.gov/policy/gen/leg/recovery/index.html#apps

15) What are the differences in allowable uses of the Title I, ARRA funds in Schoolwide vs. Targeted Title I programs?

The same compliance requirements under NCLB apply to the Title I, ARRA dollars as the regular Title I dollars, sections 1114 and 1115. In a **Title I schoolwide** school, Title I funds may be used to provide services to any student. In a **Title I targeted assistance** school, Title I funds may only be used to provide services to eligible students identified as having the greatest need for special assistance. Eligible students are students who are failing, or most at risk of failing, to meet the State's challenging student academic achievement standards on the basis of multiple, educationally related, objective criteria.
Schools may be eligible to use their Title I funding "Schoolwide" if they have at least 40 percent free/reduced-lunch population in their building. The following conditions would have to be met in considering becoming a Schoolwide building:

- intent to become a Schoolwide building was entered in the CCIP History Log;
- your Federal Programs consultant has been informed;
- the required planning to become a Schoolwide building has been completed; and
- the Schoolwide Component for the building is entered in the CCIP Planning Tool.

If you have participated in the building level Decision Framework and planning process with a building leadership team, you are encouraged to confer with your consultant in determining if your building is eligible to become a Schoolwide building on an accelerated basis.

16) Must LEAs provide equitable services to Nonpublic schools with the Supplemental Title I ARRA funds?

Yes. ARRA program requirements are consistent with the Title I, Part A statutory and regulatory requirements, including the requirements to provide equitable services to eligible private school students. The same rules apply to the ARRA Title I funds as the regular Title I Part A funds.

17) If a nonpublic school has signed off as 'not participate' on the regular Title I Consolidated Application, would that apply for the Title I, ARRA application also?

Yes. The nonpublic will have the same status of 'not participate' apply to the ARRA Title I application.

18) Where can I find information about ARRA?

American Recovery & Reinvestment Act of 2009
http://www.ode.state.oh.us/GD/Templates/Pages/ODE/ODEDetail.aspx?page=520
http://www.ed.gov/policy/gen/leg/recovery/index.html#apps

19) Where can I find information about ARRA IDEA?

U.S. Department of Education IDEA GUIDANCE
https://ccip.ode.state.oh.us/DocumentLibrary/ViewDocument.aspx?DocumentKey=65771
CCIP Doc Library ODE Guidance:
https://ccip.ode.state.oh.us/DocumentLibrary/ViewDocument.aspx?DocumentKey=1037
Contact the Office of Exceptional Children at (614) 466-2650

20) What is the purpose of the new Title I, Part A funds under the ARRA?

The ARRA Application provides new funding for programs under Title I, Part A of the ESEA to provide additional assistance to LEAs and schools that have high concentrations of students from families that live in poverty in order to help improve teaching and learning for students most at risk of failing to meet state standards and to close the achievement gap. Four principles guide the distribution and use of USDOEs Title I, ARRA funds, including the Title I, Part A funds:

(1) spend funds quickly to save and create jobs;

(2) improve student achievement through school improvement and reform;

(3) ensure transparency, reporting, and accountability; and

(4) invest one-time ARRA funds thoughtfully to minimize the "funding cliff." Because the **ARRA funds constitute a large increase in Title I, Part A funding that will likely not be available at the same level beyond September 30, 2011,** schools and LEAs have a unique opportunity to improve teaching and learning and should focus these funds on short-term investments with the potential for long-term benefits rather than make ongoing commitments that they might not be able to sustain once ARRA funds are expended.

21) What factors should an SEA and LEA take into consideration in determining how to use the new Title I, Part A ARRA funds to carry out its purposes?

USDoE has provided some examples of possible uses of Title I, Part A funds available through the ARRA in the Title I, Part A Fact Sheet, available at http://www.ed.gov/policy/gen/leg/recovery/factsheet/titlei.html]. USDoE expects LEAs to use their Title I, Part A ARRA funds to implement evidence-based strategies that will help build sustainable capacity for improving teaching and learning in Title I schools, recognizing that the amount of funds available will support interventions at a level of intensity not always possible in the past. In making decisions about the uses of these funds, USDoE encourages LEAs to give particular consideration to early childhood education and programs serving secondary schools, areas for which they may not have had sufficient resources in the past. USDoE also encourages LEAs to think creatively about the various tools that Title I, Part A provides for improving teaching and learning, including Schoolwide programming and the authority under section 1113(c)(4) of the ESEA to provide financial incentives and rewards for teachers in Title I schools for the purpose of attracting and retaining qualified teachers.

22) Can Title I ARRA money be spent on supplemental instructional materials and equipment?

Yes, however, the preponderance of the Title I ARRA money is intended to be used for instruction. If the **Consolidated Title I Application** includes money for supplemental instructional supplies and capital outlay and the amount exceeds the recommended maximum of 10 percent of the total allocation, an explanation should be provided either in the CCIP History Log or included as part of an appropriate strategy. The 10 percent guidance for supplemental materials will not apply to the Title I, ARRA since these funds are more for one time type expenditures.

23) Must an LEA maintain fiscal effort to receive Title I, Part A funds, including Title I, Part A ARRA funds?

Yes. Under sections 1120A(a) and 9521 of the ESEA, an LEA may receive funds under Title I, Part A for any fiscal year only if the SEA finds that either the combined fiscal effort per student or the aggregate expenditures of the LEA and the state with respect to the provision of free public education by the LEA for the preceding fiscal year were not less than 90 percent of the combined fiscal effort per student or aggregate expenditures for the second preceding fiscal year. If an LEA fails to meet the maintenance of effort requirement, the SEA must reduce the amount of funds allocated under Title I, Part A, including the ARRA funds (as well as the allocations of the other ESEA programs covered by the maintenance of effort requirement), in any fiscal year in the exact proportion by which the LEA failed to maintain expenditures at 90 percent of the second preceding year's level. In reducing an LEA's allocation because it fails to meet the maintenance of effort requirement, the SEA must use the measure most favorable to the LEA. For a more detailed discussion, see the section in the Title I Fiscal Guidance on the maintenance of effort requirement [available at http://www.ed.gov/programs/titleiparta/fiscalguid.doc]. Refer to C-1 through C-7 of the April 2009 U.S. Department of Education Guidance, Funds under Title I, Part A of the Elementary and Secondary Education Act of 1965 Made Available Under The American Recovery and Reinvestment Act of 2009 for more details. Title I Fiscal Non-Regulatory Guidance, U.S. Department of Education, Revised February 2008,

Maintenance of Effort, Comparability, Supplement, Not Supplant, Carryover, Consolidating Funds in Schoolwide Programs, http://www.ed.gov/programs/titleiparta/fiscalguid.doc

24) May an LEA request a waiver of the maintenance of effort requirement from USDoE?

Yes. USDoE may waive the maintenance of effort requirement if USDoE determines that a waiver would be equitable due to exceptional or uncontrollable circumstances such as a natural disaster or a precipitous and unforeseen decline in the financial resources of the state (Section 9521(c) of the ESEA). A waiver of the annual maintenance of effort requirement is for one year. A district may also request a waiver to use some or its entire share of the ARRA "Stabilization" funds to help meet the district's maintenance of effort. Districts should not use more than is necessary to meet the MOE since that level must be maintained in the future.

If an LEA receives a waiver, its Title I, Part A allocation (as well as its allocations under other covered programs) would not be reduced due to its failure to maintain fiscal effort. In deciding whether to grant an LEA a waiver of the maintenance of effort requirement, USDoE will consider the extent of the exceptional or uncontrollable circumstances cited. For example, if financial problems related to the economic downturn are cited, USDoE will consider the extent of the decline in available financial resources, in view of the ARRA, as well as changes in demand for services. USDoE will be concerned if the local government through which the LEA receives resources reduces the proportion of total revenues spent on education and will **take that fact into consideration as well. Refer to C-1 through C-7 of the April 2009 U.S. Department of Education Guidance, Funds under Title I, Part A of the Elementary and Secondary Education Act of 1965 Made Available Under The American Recovery and Reinvestment Act of 2009 for more details.**

25) Do the supplement, not supplant requirements in sections 1120A(b) and (d) and 1114(a)(2)(B) of the ESEA apply to Title I, Part A ARRA funds?

Yes. Refer to C-8, C-9 and C-10 of the April 2009 U.S. Department of Education Guidance, Funds under Title I, Part A of the Elementary and Secondary Education Act of 1965 Made Available Under the American Recovery and Reinvestment Act of 2009 For more details refer to the link to CCIP Document Library, Supplement/Supplant Requirement for Federal Funds. https://ccip.ode.state.oh.us/DocumentLibrary/ViewDocument.aspx?DocumentKey=1043
February 2008 U.S. Department of Education Fiscal Guidance,
https://ccip.ode.state.oh.us/DocumentLibrary/ViewDocument.aspx?DocumentKey=1018 .

26) Must a school receiving Title I, Part A ARRA funds meet the comparability requirements in section 1120A(c) of the ESEA?

Yes.

27) Are State Fiscal Stabilization Funds (SFSF) included in an LEA's determination of comparability?

No. Refer to C-11, C-12 of the April 2009 ARRA U.S. Department of Education Guidance.
To meet the Title I, Part A comparability requirements, an LEA must use state and local funds in each Title I-served school to provide services that, taken as a whole, are at least comparable to the services it provides in non-Title I schools. Because State Fiscal Stabilization Funds (SFSF) are federal funds, they are not included in comparability determinations. ***Note: For this***

reason, districts may wish to consider placing those teachers paid with Stabilization Funds either in non-Title I Schools or in the Title I Schools with the lowest poverty rather than the higher poverty Title I Schools if all are served. We are awaiting further guidance from the U.S. Department of Education.

28) When do Title I, Part A ARRA funds become subject to the carryover provision?

We are awaiting further guidance from the U.S. Department of Education.

29) Do the Title I, Part A requirements that an LEA provide equitable services to eligible private school children and their teachers and families apply to the Title I, Part A ARRA funds?

Yes. All Title I requirements apply to the use of Title I, Part A ARRA funds, including those requiring equitable services for eligible private school children and their teachers and families. See USDoE's guidance on this topic, available at http://www.ed.gov/programs/titleiparta/psguidance.doc. Note that USDoE may not waive the statutory and regulatory requirements relating to providing equitable services to private school children. See section 9401(c)(5) of the ESEA.

30) Must an LEA meet the specific "set-aside" requirements in Title I, Part A with respect to Title I, Part A ARRA funds?

Yes. Title I, Part A has several requirements under which an LEA must spend a specific amount of funds, usually Title I, Part A funds, on a particular activity. Those that are currently applicable are the requirements to spend:

- If a school is identified for school improvement, 10 percent of the school's Title I, Part A funds for professional development that, among other requirements, directly addresses the academic achievement problem that caused the school to be identified (Section 1116(b)(3)(A)(iii)(I)).

- If an LEA is identified for improvement, 10 percent of the LEA's Title I, Part A, Subpart 2 allocation to address the professional development needs of the LEA's instructional staff (Section 1116(c)(7)(A)(iii)).

- One percent for parent involvement activities if the LEA receives more than $500,000 under Title I, Part A, Subpart 2 (Section 1118(a)(3)(A)). For this set aside both allocations (consolidated and ARRA) should be equal to or above $500,000. **One percent can be reserved separately on the set-aside line on the Consolidated and ARRA Set Asides page or the total combined on one or the other applications.**

- An amount equal to at least 20 percent of the LEA's Title I, Part A, Subpart 2 allocation for choice-related transportation and supplemental educational services (SES), assuming there is sufficient demand for these services (Section 1116(b)(10)).

Each of these "set-aside" requirements is based on an LEA's Title I, Part A, Subpart 2 allocation. Title I, Part A ARRA funds are allocated under the Targeted Grant and EFIG formulas of Subpart 2.

FY10 CCIP Consolidated/ARRA Funding Applications

1) What are some of the Priority Items that need to be completed before your application can be approved?

a. Complete the NS3 Consultation Guide located in the SAFE Account for participating nonpublic schools.

b. Complete and fax Form C Participation to (614) 752-1622, to your consultant. If districts would like to send SIGNED electronic copies of their Form C letters into ODE rather than faxing them, we created an email account specifically for that at ncnp.formc@ode.state.oh.us. IDEA, Part B legislation Public Law 108 - 446, 20 USC 1412(a) (10) requires all non-chartered nonpublic schools to document equitable participation. Reference: CCIP Note 154 for complete listing of all non-chartered, non-tax supported schools. You can find the form and sample letter in the document library under CCIP Nonpublic School Services. If you use the letter, include a date for them to reply with a note that failure to reply will be considered a waiver of participation. If you need to use the letter, include that with Form C. Complete Form C except for the signature if there is no reply, and mark 'consultation given' and 'no' to participation.

c.CCIP FY2010 District Plan HQT Component has been updated per the instructions in the letter sent to the LEA superintendent in February and noted in the CCIP History Log. Districts required to address section 2141(c) of Title II-A have added or updated the agreement with the agency in the third optional HQT Component. There is a statement of agreement by the consultant in the CCIP History Log. Refer to the HQT Criteria and HQT Rubric in the CCIP Doc Library under CCIP Needs Assessment and Planning.

d. LEAs in School Improvement Year1 and above have included on their Web site the required information on PSC and SES as mandated in 200.39(c) of 34 CFR Part 200 of the final regulations of NCLB.

e. Recipients of Title I School Improvement grant monies must submit a letter of commitment to ODE.

2) What is the LEP Improvement Component?

Some LEAs received notification from the LAU Resource Center that they were required to complete the LEP Improvement Component. If you have any questions regarding this new component, you can contact either Dan Fleck or Abdi Mohamud by phone (614-466-4109) or by email at dan.fleck@ode.state.oh.us or abdinur.mohamud@ode.state.oh.us

3) Do Districts that decide to form a Title III LEP Consortium in FY2010 need to submit a Consortium Form to ODE?

Yes, districts that decide to form a consortium in FY2010 must submit a form again to our office. The form is good for only one fiscal year. Districts that intend to form a consortium for FY2010 should wait until mid-July and submit the form after we post the final LEP allocations, per the instructions in CCIP Note #175 (see excerpt below).

Title III LEP funding allocations were posted only to those districts that reached the minimum $10,000 based on a very conservative estimate of our state award from the U.S. Department of Education. Once we receive the actual award in July, we will publish the final allocations for all districts. Title III LEP consortia (both fiscal agents and district members) should know that because final Title III allocations will not be made until July, they should make a commitment to continue to plan for a consortium in case the final allocation is less than $10,000 for any of the member districts. The preliminary Title III LEP allocations are posted in the CCIP Document Library page of the ODE Web site, under Consolidated Funding Application, Title III: https://ccip.ode.state.oh.us/DocumentLibrary/ViewDocument.aspx?DocumentKey=66449. The Consortium Form and Directions as well as Guidelines for Establishing a Title III LEP Consortium can also be found in the same section of the CCIP Doc Library, under Title III Forms.

4) Which Application should be completed first?

Complete the Consolidated Title I Application first before completing the ARRA Application. The Consolidated Title I Application must be in *Draft Completed Status* before the ARRA Application can be put into *Draft Completed Status*. **First submit the Consolidated Title I Application as *Authorized Representative Approved*.** It would be preferred, but not necessary, to submit the ARRA Application at the same time so they may be reviewed in conjunction with each other.

5) Other than the validation messages on the CCIP Funding Application Sections Page, how else can we check the application?

Refer to the CCIP FY2010 Checklist-Consolidated/ARRA Funding Application Grants located in the CCIP Doc Library under Forms Used with the CCIP, Consolidated Funding Application Grants when completing the FY10 CCIP Consolidated Applications. If you have questions or need additional assistance, please contact your federal programs consultant.

6) How do I create/update a Fiscal Resource for the Title I Consolidated and ARRA Applications?

The Fiscal Resources can be updated in the District Agency Plan in the Planning Tool. Changes can only be made through the Planning Tool, in the District Agency Plan. Expand All on the Plan Overview Page. Determine the goal for the funding source. If the grant is already listed in the fiscal resource section under the goal from a previous year, then simply click on the grant title in the fiscal resource section and enter the dollar amount in the 2010 box. If the grant title is not listed, click on *Create Fiscal Resource* and select the appropriate funding application (Consolidated or ARRA). Next, select the appropriate grant (Title I Part A) in the FY 2010, add the amount, rounded to the nearest dollar, and save. The Fiscal Resources, when viewed in the Plan Relationship on the Funding Application side is Read Only Access and fiscal resources cannot be entered or changed.

7) How are we to complete the District Agency Plan Needs Assessment for FY2010?

CCIP Note 163 provides additional information about this. Some districts, primarily those identified in low-, medium- or high-support categories under Ohio's Differentiated Accountability Model, have received training and are implementing the Ohio Improvement Process (OIP), which includes using the Decision Framework to develop the FY 2010 planning tool needs assessments to inform the district plan goals, strategies and action steps. A Decision

Framework is available for all districts and schools including community schools and can be accessed at the following web site: www.ohioschoolleaders.org/framework/index.cfm . CCIP Note 163 provides additional information about this process. During this transition period, however, we understand the need for flexibility. The Ohio Improvement Process (OIP) link below is provided as a resource: http://education.ohio.gov/GD/Templates/Pages/ODE/ODEDetail.aspx?page=3&TopicRelationID=590&ContentID=61276&Content=61875

- The Decision Framework (DF) tool will be accessible online in July. The DF data will be updated late August.
- The Implementation Management and Monitoring tool will be accessible in July.

For districts not yet involved in the OIP process or for those that have not received the necessary training on the decision framework, our advice is to stay within your comfort level. If you are more comfortable in continuing to use the seven constructs to develop your FY10 needs assessment that will be acceptable. The Needs Assessment Rubric for the seven constructs is still available in the doc library under CCIP Needs Assessment and Planning. Whether you use the decision framework or the seven constructs as your model, **we will still need the following items to be included in the Needs Assessment:** The assurance regarding the state minimum standard teacher-pupil ratio if using IIA funds for class size reduction, The percentage or number of Help Me Grow students who had their IEPs in place by their third birthday, and the HQT status of core subject teachers and qualifications of principals.

8) May an LEA allocate Title I, Part A ARRA funds to eligible schools that are not currently being served?

Yes. An LEA may allocate Title I, Part A ARRA funds to eligible schools, such as high schools, that are not currently being served, provided the LEA allocates those funds consistent with section 1113 of the ESEA and 34 C.F.R. § 200.78. For more information, see USDoE's guidance on within-LEA Title I allocations, available at http://www.ed.gov/programs/titleiparta/wdag.doc.

9) How are the Title I Building Eligibility and School Allocation PPA pages to be completed?

Districts should complete the Consolidated Title I Building Eligibility Page first before doing the ARRA Building Eligibility Page. This is because the Title I Building Eligibility Page and the School Allocation PPA List Page in the Consolidated Application will impact how both the Building Eligibility and the School Allocation PPA List pages are completed in the ARRA application.

10) Building Eligibility Page

Buildings must meet one or more of the following eligibility criteria:

- at/above 35 percent low income;
- at/above district-wide poverty average;
- at/above district-wide grade span poverty average for the relevant grade span;
- by rounding;
- by feeder pattern;
- under 1,000 students in district;

- served the previous year. (If not eligible for the current year, but was eligible and served the preceding year, the building may be served for only one additional year unless it re-qualifies under one of the other eligibility criteria.)

Districts with fewer than 1,000 students do not need to meet the building percentage qualifications for service.

Feeder Pattern/Recalculation Columns
Districts may want to consider the use of the feeder pattern or sort order options explained below in determining building eligibility. The ARRA Title I funds may enable LEAs to consider expanding services to other schools, especially middle and high schools. High school and middle school students may be less likely to participate in free- and reduced-price meal programs than elementary school students. Hence, these schools may not be identified as eligible for Title I services. A district may use the feeder pattern to make a building eligible. This allows the district to project the number of low-income children in a middle or high school, **based on the low-income percent of the elementary attendance areas that feed into that school.**

To use feeder pattern, list the new percent of low income under the Feeder Pattern or Rounding percent of Low column.

Example 1 of Feeder Pattern

District Elementary	Enrollment #	Low-Income #
School A	568	364
School B	329	163
School C	588	262
School D	836	277
Total	**2321**	**1066**
High School	**2,000**	**918**

Example 1: Calculate average percentage of poverty for the four elementary school attendance areas by dividing the total number of low-income children by the total enrollment (1066/2321). The average percentage of poverty is 45.92 percent. Because these four elementary schools feed into the high school, the poverty percentage of the high school is also 45.92 percent. To calculate the number of low-income students in the high school, multiply the total school enrollment of the high school by the average percentage of poverty for the four elementary feeder schools (2000 x 45.92%=918). Place this number in the column labeled “Recalculation # of Low Income,” beside the high school. Place the poverty percentage of the high school, 45.92 percent, in the feeder pattern column.

Example 2 of Feeder Pattern

District	Enrollment #	Low-Income #
Elementary		
School A (1)	512	360
School B (1)	322	142
School C (2)	450	100
School D (1)	376	201
School E (2)	504	221
School F (2)	610	307
School G (1)	416	202
Total	**3,190**	**1,533**
(Middle School 1)	**1599**	**890**
(Middle School 2)	**1325**	**532**
(High School)	**3,000**	**1,442**

Example 2: (Middle School 1) Calculate average percentage of poverty for elementary attendance areas A, B, D, and G by dividing the total number of low-income children in schools A, B, D, and G by the total enrollment of schools A, B, D, and G (905/1,626). The average percentage of poverty is 55.66 percent. Because these four elementary schools feed into Middle School 1, the poverty percentage of Middle School 1 is also 55.66 percent.

To calculate the number of low-income students in Middle School 1, multiply the total school enrollment by the average percentage of poverty for the four elementary feeder schools (1,599 x 55.66%=890). This is the number used for allocating Title I funds to Middle School 1. Place this number in the column labeled "Recalculation # of Low Income," beside the appropriate middle school. Place the poverty percentage of Middle School 1, 55.66 percent, in the feeder pattern column.

(Middle School 2) - Calculate average percentage of poverty for elementary attendance areas C, E, and F by dividing the total number of low-income children in schools C, E, and F by the total enrollment of schools C, E, and F (628/1,564). The average percentage of poverty is 40.15 percent. Because these three elementary schools feed into Middle School 2, the poverty percentage of Middle School 2 is also 40.15 percent. To calculate the number of low-income students in Middle School 2, multiply the total school enrollment by the average percentage of poverty for the three elementary feeder schools (1,325 x 40.15%=532). This is the number used for allocating Title I funds to Middle School 2. Place this number in the column labeled "Recalculation # of Low Income," beside the appropriate middle school. Place the poverty percentage of Middle School 2, 40.15 percent, in the feeder pattern column.

(High School) if ONLY one HS - Calculate average percentage of poverty for all elementary attendance areas by dividing the total number of low-income children by the total enrollment (1,533/3,190). The average percentage of poverty is 48.06 percent. Because all elementary schools eventually feed into the high school, the poverty percentage of the high school is also 48.06 percent. To calculate the number of low-income students in the high school, multiply the total school enrollment by the average percentage of poverty for all the elementary feeder schools (3,000 x 48.06%=1442). This is the number used for allocating Title I funds to the high school. If multiple high schools use the same process to determine feeder low income percent, as described previously for multiple high schools.

Sort Order Option

Eligible buildings below 75 percent low income may be ranked and served in the order of low-income percent or grade level that your Needs Assessment process targets. For example, eligible buildings with grades K-4 may be served before other grade levels if your needs assessment indicates this. Eligible buildings with the same grade level must be served in order of highest to lowest low-income percent.

For **additional information** on the Title I Building Eligibility Page, refer to the **CCIP Help** link on the Title I Building Eligibility Page or the **CCIP Doc Library**, Consolidated Funding Application, Title I-A, ODE Guidance, Building Eligibility-Title I.

12) Title I School Allocation PPA Page

Districts are to complete the Consolidated Title I Funding Application first before doing the ARRA Application. This is because the Title I Building Eligibility Page and the School Allocation PPA List Page in the Consolidated Application will impact how both the Building Eligibility Page and the School Allocation PPA List Page are completed in the ARRA application. One must view the Title I Building Eligibility Page in both applications as if they are one and apply the rules as if the schools are listed in descending order taking both eligibility pages into consideration. See examples below:

Example 1 (100 percent Rule): LEA serves the same buildings in Consolidated and ARRA Applications. Per Pupil Amount - $850.00 (For purposes of allocating to the buildings, use the LEA Consolidated Application LEA PPA as the basis for determining the school PPA amount in Column F).

	(column F PPA) Title I Consolidated Service	(column F PPA) Title I ARRA Service	Total
School A	900 SW	500 SW	1400
School B	870 TA	450 TA	1320
School C	800 TA	400 TA	1200
School D	750 TA	350 TA	1100

Allocate Title I funds to the participating schools on this page, which are in the order you ranked them on the Title I Consolidated Building Eligibility page. Do this by adjusting the actual PPA in column F. PPAs must be the same or in descending order. When you place the PPA amount in column F, the total allocation for each building will populate in the last column. This is the amount of Title I funds that the LEA must make available to the building. LEAs may allocate funds to the buildings using less than the recommended minimum PPA, as long as all PPAs are the same or in descending order. The district may serve a school using less than a minimum PPA, as long as the funds are sufficient to enable children to make adequate progress toward meeting the state's performance standards. If funds are not sufficient to serve buildings adequately, the district must increase the PPA for one or more buildings and serve fewer buildings.

Example 2 (100 percent Rule): LEA serves additional buildings in the ARRA Application. Per Pupil Amount - *$850.00 (For purposes of allocating to the buildings, use the LEA Regular Application LEA PPA as the basis for determining the school PPA amount in Column F).

	(column F PPA) Title I Consolidated Service	(column F PPA) Title I ARRA Service	Total
School A	960 SW	0.01 *SW	960.01
School B	870 TA	0.20 *TA	870.20
School C	850 TA	20.00 TA	870
School D	800 TA	50.00 TA	850
School E**	0 None	850.00 TA	850
School F **	0 None	300.00 TA	300

**Note that Schools A and B are marked TA in the ARRA Application since they are Title I Served in the Consolidated Application, LEAs must allocate at least $0.01 for each building to avoid triggering a system error.*

*** Note, that Schools E and F will not show up on Title I Consolidated Application School Allocation PPA page.*

Allocate Title I funds to the participating schools on the Title I Building Eligibility page, in the order you ranked them on the Regular Title I Building Eligibility page. Do this by adjusting the actual PPA in column F. PPAs must be the same or in descending order. When placing the PPA amount in column F, the total allocation for each building will show in the last column. This is the amount of Title I funds the LEA must make available to the building. LEAs may allocate funds to the buildings using less than the recommended minimum PPA, provided all PPAs are the same or in descending order. The district may serve a school using less than a minimum PPA, provided the funds are sufficient to enable children to make adequate progress toward meeting the state's performance standards. If funds are not sufficient to serve buildings adequately, the district must increase the PPA for one or more buildings and serve fewer buildings.

Example 3 (125 percent Rule): LEA serves additional buildings in ARRA Application. Per Pupil Amount = *$850.00 (For purposes of allocating to the buildings, use the LEA Consolidated Application LEA PPA as the basis for determining the school PPA amount in Column F).

	(column F PPA) Title I Consolidated Service	(column F PPA) Title I ARRA Service	Total
School A	900 SW	0.01 *SW	900.01
School B	880 TA	2.00 *TA	882
School C	860 TA	20.00 TA	880
School D	850 TA	30.00 TA	880
School E**	0 None	850.00 TA	850
School F **	0 None	300.00 TA	300

** Note that Schools A and B are marked TA in the ARRA Application since they are Title I Served in the Consolidated Application, LEAs must allocate at least $0.01 for each building to avoid triggering a system error.*

*** Note that Schools E and F will not show up on Title I Consolidated Application School Allocation PPA page.*

Note that both the Consolidated and ARRA PPA amounts must be totaled to ensure that the per pupil amount adheres to the basic rules that are outlined in the *Help* link on the Title I School Allocation PPA List Page. In the example above, School A has an amount equal to or greater that the district PPA amount. School B has an amount equal to or less than School A but greater than the district PPA amount. School C has an amount equal to or less than School A but greater than the district PPA amount. The same rules apply to Schools D and E. If remaining funds are not sufficient to fully fund the last eligible school, School F, on the page using the minimum PPA, the district may serve the school using less than a minimum PPA. However, the amount of funds must be sufficient to enable children to make adequate progress toward meeting the state's performance standards. If funds are not sufficient to serve the last building adequately, the LEA must increase the PPA for one or more other buildings and serve fewer buildings. Using less than the minimum PPA applies only to the last building on the page. Must increase the PPA for one or more other buildings and serve fewer buildings. Using less than the minimum PPA applies only to the last building on the page.

STATE FISCAL STABILIZATION FUNDS (SFSF)

1) What are State Fiscal Stabilization Funds (SFSF)?

The purpose of State Fiscal Stabilization Funds is to restore states spending on K-16 education formulae to maximum of 2008 or 2009 levels to help stabilize state and local budgets in order to minimize and avoid reductions in education and other essential services. The SFSF provides

funding to help stabilize state and local government budgets to minimize and avoid reductions in education and other essential public services.

Ohio's SFSF allocation amount is $1.79 billion, including $1.46 billion for funds to restore the state's support for elementary, secondary and public higher education.
State Fiscal Stabilization Funds Guidance:
http://www.ed.gov/policy/gen/leg/recovery/factsheet/stabilization-fund.html
http://education.ohio.gov/GD/Templates/Pages/ODE/ODEDetail.aspx?page=520

2) How can LEAs receive State Fiscal Stabilization Funds (SFSF) funds?

These funds will be provided to LEAs through the state foundation formula. According to ARRA, LEAs must apply to the state for SFSF. ODE has developed an application for superintendents and treasurers to apply by logging into their ODE SAFE account and clicking on the link to FSL – Forms and Surveys List. LEAs were asked to complete an application for this purpose by **June 12** to allow ODE to process these applications in time for July foundation payments.

For questions, contact Barbara Mattei-Smith at Barbara.mattei-smith@ode.state.oh.us or (614) 752-1219. LEAs must apply to states for funds and submit final expenditure reports related to the use of the funds. According to ARRA, local education agencies must apply to the state for SFSF.

3) What federal statutes do State Fiscal Stabilization Funds (SFSF) fall under?

LEAs may use SFSF for purposes allowed under 4 federal statutes: IDEA, Perkins (Career Technical Education), Adult and Family Literacy Act or ESEA/NCLB ESEA. Title VIII, of NCLB/ESEA allows districts to use the funds for school renovation, modernization and construction. The SFSF must be used to restore state's primary and secondary as well as higher education (K-16) funding formulae. The state will take the following steps:

a. Determine formula shortfalls for K-16
b. Provide SFSF funds based on proportional shortfall to K-12 and higher education

4) What can State Fiscal Stabilization Funds (SFSF) be used for?

The ARRA also provides that, to the extent consistent with state law, a district may use SFSF for modernization, renovation, or repair of public school facilities, including modernization, renovation, and repairs that are consistent with a recognized green building rating system.

5) Are there any restrictions in the use State Fiscal Stabilization Funds (SFSF)?

Yes, these funds may not be used for:

(a) **Stadiums** or other facilities primarily used for athletic contests or exhibitions or other events for which admission is charged to the general public;

(b) **Improvement of stand-alone facilities whose purpose is not the education of children**, including central office administration or operations or logistical support facilities; and

(c) **School modernization, renovation, or repair that is inconsistent with state law.** In addition**,** if a district uses SFSF for modernization, renovation, or repair of public

school facilities, it must comply with prevailing wage laws and specific requirements relating to the use of American iron, steel, and manufactured goods used in the project. This authorization allows districts to use these funds for general operating expenses and removes any supplement, not supplant restrictions. However, these are federal funds and will be subject to separate reporting requirements. Districts will be required to receipt SFSF into a new fund.