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Deborah S. Delisle, Superintendent of Public Instruction

Comprehensive Continuous Improvement Plan Allocation Process

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Summary: For purposes of this document, the terms "formula" and "competitive" are used to describe a type of grant. Formula grants are allocated based on mandated formulas using specific data criteria such as population, poverty level or number of special education students. Under a competitive grant program (also known as discretionary grants), the State Educational Agency (SEA) has discretion over the allocations for eligible applicants.

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Comprehensive Continuous Improvement Plan

Allocation Process

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OVERVIEW

For purposes of this document, the terms "formula" and "competitive" are used to describe a type of grant. Formula grants are allocated based on mandated formulas using specific data criteria such as population, poverty level or number of special education students. Under a competitive grant program (also known as discretionary grants), the State Educational Agency (SEA) has discretion over the allocations for eligible applicants.

Therefore the grant type will determine the process in which the Ohio Department of Education (ODE) will use to allocate grants maintained within the Comprehensive Continuous Improvement Plan (CCIP) to eligible local education agencies (LEA). The following table was developed as a guideline to help with the flow of grant allocations for all applicable grants.

Table 1.0 General Federal Grant Cycle

Type of Grant	Initial Allocations	Application Approval	Reallocation & Final Reallocation	Final Expenditure Report	Carry-over	Review Carryover (9/30 Report)	Adjust/ Remove Carryover
Formula	July	July	*December & February/March	Sept 30	Sept 30	Oct	Oct/Nov
Competitive	July	July		Sept 30	Sept 30	Oct	Oct/Nov

The dates for reallocation and final reallocation are for planning purposes only. The reallocation process directly relies on the School Options Enrollment Systems schedules extracts.

This document will describe the federal programs financial business process cycle which includes:

- Creating grant control Sheets;
- Calculating initial allocations;
- Approving applications;
- Calculating and disseminating reallocations;
- Monitoring of federal program funds; and
- Ending the business year.

1.1 Grant Control Sheet

When ODE receives an award letter from the United States Department of Education (USDOE) the fiscal officer responsible the accounting of the funds, with the help of the program office, completes a grant control sheet. The grant control sheet is a document used to account for funds in total by subsidy, administration and set asides. The program office assists the fiscal office with the breakdown of the total award by subsidy,

administration and the set aside, as set forth in the individual grant rules and regulations. In most cases, guidance provided by USDOE is utilized.

Only grants administered by the CCIP will have grant control sheets loaded into the CCIP. The total funds documented on the grant control sheet must equal the award letter from USDOE. Once completed the fiscal officer submits the grant control sheet to the Office of Federal and States Grants Management (OGM) for review and approval. The review and approval process completed by OGM is two-fold. The analyst not only monitors the program office's allocation to the districts but also monitors the total allocation of the fiscal officer and program offices. The OGM analyst compares the total federal award amount (USDOE grant award) to the grant control sheet to ensure the fiscal officer and the program office have not over-allocated. Also the analyst inquires if the total allocation amount loaded into CCIP is less than the Grant Control Sheet total amount.

During this review and approval process, the analyst within OGM reviews a micro-strategy report to identify:

- missing grant control sheets,
- grant control sheets that need updated or
- allocation needs adjusted.

See Attachment for example of the grant control and micro-strategy report use.

1.2 Initial Allocation

The CCIP is designed to allow the fiscal and program pieces of the grant to work together and ensure compliance with rules and regulations. During the spring the LEAs are working on and completing the planning tool within the CCIP. The planning tool

documents how the districts will meet the various requirements programmatically. The funding application on the other hand documents the fiscal side of a grant. The funding application is comprised of, but not limited to the following:

- Allocation
- Budget
- Project Cash Request
- Final Expenditure Report
- History Log
- Assurances

During the initial allocation phase, LEAs are given the ability to plan and request federal dollars for the program period. In addition, ODE ensures the established community schools receive their federal award allocations. Consequently, ODE must utilize prior year data elements until the community school enrollment counts are updated/reconciled. This process is discussed in section 1.3 "New Allocations, Reallocation & Final Allocations". Therefore, the initial allocation loaded in July, for all allocations requiring data elements to be updated or reconciled, are considered estimates.

Initial awards sent by USDOE are considered estimates until the grant award notification is received (in early July). However, federal awards may be adjusted by USDOE until October of the current year. ODE must consider the possibility of an adjustment and has built controls into the CCIP. The Grants Management Administrator has the ability to control the flow of funds of specific awards, also known as the "funding percentage". Since the allocations can be adjusted up through October the funding percentage is set at 75%. Once a new grant award is obtained and the grant control sheet is updated, the funding percentage is moved up to 90%. The funding percentage is then moved up to 100% after all the foreseen allocations adjustments and reallocations are completed, around March of the current year.

1.3 New Allocations, Reallocation & Final Allocations

As noted in Section 1.2, the initial allocations use federal awards and prior year data elements that are subject to adjustment and reconciliation. In December, student enrollment counts and other needed data elements are updated to reflect current year counts. Depending on the grant, the program office will complete either a new allocation or reallocation.

- **New allocation** recognizes new schools that were not opened in the prior school year and therefore did not have data elements to be used for the "initial allocation". This usually is when new community schools are recognized.

- **Reallocation and Final Allocation** recognizes both new schools and LEAs with expanded enrollment. Depending on the grant, allocations are adjusted from LEAs who received an initial award but due to the increase or decrease in student enrollment data will have their allocation adjusted. Again, this is usually when new community schools are recognized or an already established community school's enrollment has significantly expanded. The Final Allocation allows community schools one last opportunity to update their enrollment for one final extract from the School Option Enrollment System (SOES). To access the SOES manual, click the following link:

  http://education.ohio.gov/GD/DocumentManagement/DocumentDownload.aspx?DocumentID=53652

  (For example: Title I-A, the SEA is responsible for allocating Title I-A funds not only to the traditional district but also to the associated community schools. Since Title I-A is based on Census data, and there is no census data for the community schools, the SEA must use prior year's data for the initial allocation. The current enrollment data is extracted from SOES will identify community schools with significant expanded enrollment and new community schools. Since Title I-A views the children at the community school as coming from a traditional district, the reallocation & final reallocation removes the calculated number of poverty students leaving the traditional district and allocates it to the community school.)

1.4 CLOSEOUT

- **Final Expenditure Report (FER)**
  Once the program period has ended an LEA must liquidate obligations for all CCIP grants within 90 days and submit their Final Expenditure Report (FER). The FER captures the expenditure activity of the grants and documents the carry-over provisions when applicable. The CCIP generates the FER and provides fiscal information onto the FER that the CCIP normally maintains. The LEA will verify the carry-over amount and once the FER is approved, the carry-over is automatically placed into the current program year's allocation.

  The Office of Grants Management is responsible for reviewing and approving submitted FERs. The deadline for FERs is 11:59:59 p.m. on September 30 (of the current year). Additional payments after this date are withheld within the funding groups until the FER is received. Those districts exhibiting poor cash management habits will be required to submit financial records and other relevant documentation with the FER. The request for additional documentation shall be submitted to the district (via email or telephone and documented on CCIP history log) by May.

  With receipt of the FER, the agency shall check for any funds not requested by the district to be moved to carryover. Working with the various program offices, OGM will sweep and placed in a pool for redistribution by the program office. This step ensures funds will not be returned and therefore lost to the state and districts.

- **9/30 Report**
  The September 30 Report allows local educational agencies to maximize their federal grant carryovers in the CCIP Consolidated Funding Application. The 9/30 report allows ODE to remove carryover from districts in excess of allowable amounts. Due to the agency's use of the First In First Out (FIFO) methodology, the 9/30 Report helps reconcile allowable expenditures during July 1 thru September 30 of the most recent grant period with excess carryover from the prior fiscal year's application. This permits the district the full 27 months of expenditures allowable under the Tydings Amendment.

  Excess funds may occur because of exceeding a statutory carryover limitation or

exceeding a period of availability. If the 9/30 verifies excess funds exist in Title I and IV due to carryover limitations, those funds must either be waived as allowed by the program requirements or removed and redistributed to other districts. If the allotted funds have exceeded the period of availability, they must also be removed (reclaimed) from the district and not replaced with more current funds.

- **Funds Redistribution**
  The redistribution of funds must be conducted following an acceptable redistribution protocol. In those programs where a redistribution policy is not described by statute or regulation, the state must develop a protocol which must be in writing and show clear evidence of fair and equitable treatment. When redistributing funds, a rational basis for the redistribution should be developed. For instance, ODE may use funds to help most districts or to help districts demonstrating a need or harm done through changes to the allocation beyond their control (generally affected by loss of student population, change in poverty count, migration to a new allocation formula, etc.) or to promote an effective practice (i.e., preschool). Districts will not be considered for funds redistribution if the same funds were removed from them due to excessive carryover. Redistribution may occur at any time, but just as with removing funds, it is best to consider time periods having the least affect on the schools – near the beginning of the year, coincident to a reallocation process, etc. It is important to note redistributed funds are generally called "additional" funds to differentiate them from original allocation.

- **Funds Removal**
  Remove funds from any district failing to apply in the previous year (if not done earlier). Contact the district so they are aware of what you intend to do. In the event they can articulate a rational basis for carrying over the funds to the next year, the Federal Programs staff must help them process an application (no budget is required) that will allow the funds to move through the system via the FER and get into the next year's application via the carryover. Removing disallowed carryover – in cases where the program office determines that carryover will not be permitted (excess as defined by the statute or failure to apply); the office must remove excess funds from any district failing to fully expend the full allocation. The following list includes means for identifying available funds:

    - Identify all districts with excess funds after the FERs have been approved
    - Identify any entity failing to apply in the prior year

- Identify any funds not requested as carryover via the FER process
- Identify any funds remaining in programs not permitting carryover

- **Refunds**
  Refunds may be necessitated as a result of a finding against the district by the Auditor of State, Grants Management, or Federal Programs staff. Regardless of the reason, Grants Management notifies the district of the requested refund (see attachment). In some cases a refund is required due to reallocation or final reallocation.

  For example: A community school receives an initial allocation based on prior year's enrollment numbers. However, in the current year the enrollment decreases significantly. The reallocation would reduce the allocation to reflect the updated enrollment numbers. If the School received more than their new allocation then a refund would be required.

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Title **Title I-A - Grants to Local Education Agencies (Basic, Concentration, Targeted and Education Finance Incentive Grants)** **CFDA** 84.010

Program Year July 1 to June 30

Data Elements -Community School Average Daily Attendance Enrollment

Title I-A Grants to Local Education Agencies (Basic, Concentration, Targeted and Education Finance Incentive Grants)

The Title I-A allocation process begins with the initial allocation on July 1st. Since Title I-A data is based on census, the United States Department of Education (USDOE) allocates Title I-A only to traditional districts. The State Education Agencies have the responsibility, with guidance from USDOE, to allocate the appropriate levels of allocation to community schools. Since the Title I-A allocation uses a poverty count based on census to allocate funds, the Ohio Department of Education (ODE) must use an adjusted poverty count to allocate to the community schools. Therefore, the initial allocation to each community schools uses their enrollment numbers from the prior year and is considered an estimate until the October student count.

Once the October Student Count information is extracted from School Option Enrollment System (SOES), the title funds can then be reallocated. ODE will calculate an adjusted poverty count for reallocating funds. This reallocation recognizes not only new community schools but also expanding enrollment. If the enrollment increases for a community, the Title I per pupil amount from the traditional district the student is leaving will follow the student. Likewise, if the community school enrollment decreases the Title I-A funds would flow back to the traditional district.

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Title Title I-B - Reading First **CFDA**

Program Year July 1 to June 30

Data Elements

Reading First-Ohio General Information

The Reading First program is a competitive, federal grant program that supports teachers and students in low-performing, high-poverty schools and targets children in kindergarten through grade three. The program uses scientifically based reading research and proven instructional strategies and tests to ensure that all children can read at or above grade level by the end of third grade.

Reading First was created by the No Child Left Behind Act and is targeted for schools in high poverty areas that need assistance in improving academic achievement. Ohio initially received a Reading First grant from the U.S. Department of Education in 2003 that allocated almost $176 million over six years.

29 LEAs, which were divided into three cohorts, have been served since the grants inception in 2003 and will continue though Ohio's fiscal year 2010. Annually, an LEA is required to submit a budget to ODE.

No new districts or community schools were considered for funding therefore section 5206 is not applicable.

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Title **Title 1-C – Migrant Education** **CFDA** **84.011**

Program Year June 15th to Sept. 30th (approximately)

Data Elements -EMIS

.Migrant Education

Title 1- Part C Education of Migratory Children funding is based on the Category 1 and Category 2 unduplicated count of migrant children ages 3 to 21 in the state of Ohio as reported on the Consolidated State Performance Report (CSPR). The funds are sub-granted to school districts to operate migrant education programs (MEP) in the summer.

There are no community schools in the state of Ohio that operate migrant education programs.

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Title Title I-SI - School Improvement **CFDA** _____

Program Year July 1 to June 30

Data Elements -Local Report Card data
-Comprehensive Continuous Improvement Plan (CCIP)
- Ohio Educational Directory System (OEDS)

Title I School Improvement Grants: Procedures for Mid-Year Reallocations

Title I School Improvement (SI) Grants are given prior to the beginning of the school year for eligible open schools in School Improvement (SI Year 1 or higher) that have been prioritized by need. The amount is generally a standard fixed amount for each candidate for funding, based in part on the total number of schools eligible for funding and the total funds available. There are no dependencies on enrollment. There is no scheduled mid-year reallocation. The only changes after the original allocation are made for special situations, including mid-year school closures or reorganizations relevant to SI. Newly opened schools, which by definition cannot be in SI, are not funded by these grants.

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Title **Title II-A - Improving Teacher Quality** **CFDA** **84.367**

Program Year July 1 to June 30

Data Elements -Community School Average Daily Attendance Enrollment
- Total Average Daily Attendance

Title II-A Improving Teacher Quality

The Title II-A allocation process begins with the initial allocation on July 1st. The USDOE allocation is reduced for Eisenhower Professional Development and Class Size Reduction. The remainder of the allocation must be split is based on 20% Child Population and 80% Poverty count. The State Education Agencies have the responsibility, with guidance from USDOE, to allocate the appropriate levels of allocation to community schools. The Title II-A allocation uses average daily attendance and poverty counts to allocate funds. Therefore, the initial allocation to each community school uses their enrollment numbers from the prior years and is considered an estimate until the October student count.

Once the October Student Count information is extracted from School Option Enrollment System (SOES), the title funds are then reallocated. ODE will calculate an adjusted poverty count for reallocating funds. This reallocation recognizes not only new schools but also expanding enrollment.

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Title **Title II-D - Education Technology** **CFDA** **84.318**

Program Year July 1 to June 30

Data Elements -community school Average Daily Attendance Enrollment

Title II-D Education Technology

Title II-D Education Technology allocation is the district's allocation percentage of total Title I-A. Therefore, Title II-D is an estimate during the initial allocation phase as well. The allocation does not become actual until October Enrollment Count and Title I-A is recalculated. Since allocations are directly tied to Title I-A, a change in Title I allocation, the addition or subtraction of a community school will cause the II-D allocation to fluxuate.

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Title **Title III – English Language Acquisition State Grants** **CFDA** **84.365**

Program Year July 1 to June 30

Data Elements
-Total ADM
-SOES
-LEP enrollments in EMIS (October count week)

English Language Acquisition State Grants

Each LEA receives a yearly allocation based on a formula prescribed by USDOE based on the number of LEP and Immigrant students reported by each school district. The formula takes the amount of available funds divided by the number of identified students to get a per student amount. Then, the per student amount is multiplied by the number of students in a particular district to arrive at the amount to be awarded to each district.

In Accordance with Section 5206 of No Child Left Behind, ODE shall ensure that community schools that first open after November 1 of any academic year, and community schools that have successive enrollment expansions, and are eligible for the Title III funds based on updated LEP enrollment data, have a full and fair opportunity to receive those funds during the community schools' first year of operation. Adjusted Title III allocations for the indicated community schools will be made in January of each year based on enrollment data collected from the School Options Enrollment System (SOES).

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Title **Title IV-A - Safe & Drug Free Schools** **CFDA** **84.186A**

Program Year July 1 to June 30

Data Elements -EMIS (October count week)
-SOES

Title IV-A Safe and Drug-Free Schools Grants: Procedures for Mid-Year Reallocations

Title IV-A Safe and Drug-Free Schools Grants are given to all LEAs (districts, vocational school districts, community schools, and state-supported schools) that had a Title I allocation the previous year and/or have enrolled students. 60% of the grant is based on the LEA's proportionate share of prior year Title I allocations. For this part, no money is allocated if the LEA had no Title I allocation the prior year; this includes newly opened community school LEAs. 40% of the grant is based on enrollment ADM. Non-public schools within the boundaries of a public district are included. For the most part, the only changes after the original allocation are either corrections (if needed) or additional mid-year allocations by early March for cases of newly opened community schools or significant increases in community school enrollment as registered in SOES (School Options Enrollment System). Such additions and increases are registered on a case-by-case basis, with the money drawn from (a) newly released Title IV-A allocations, e.g., from closed community schools, (b) previously reserved Title IV-A allocation, i.e., available money not included in the original allocations or, if necessary, (c) broader adjustments to current year Title IV-A allocations. These additions or increases only pertain to the 40% of the grant that is based on enrollment ADM.

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Title **Title IV-B - 21st Century Community Learning Centers** **CFDA** **84.287C**

Program Year July 1 to June 30

Data Elements -OEDS-R

21st Century Community Learning Center Grant

The Ohio Department of Education's Office for Safety, Health and Nutrition (OSHN) administers the 21st Century Community Learning Center (CCLC) grant. This federally funded grant program supports high-quality, before- and after-school learning opportunities and related activities for students who attend eligible schools.

The Comprehensive Continuous Improvement Planning (CCIP) competitive grant application submission system opens each fiscal year approximately in early February and closes in late April.

Notification of the grant opportunity is given to all LEAs, which includes community schools, via of electronic mail to all superintendents and CCIP authorized representatives identified in the Ohio Education Directory System (OEDS).

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Title **Title V – Innovative Programs** **CFDA** **84.298**

Program Year State fiscal year 2008 – no new federal funds.

Data Elements

Title V Grants:
Procedures for Mid-Year Reallocations

Data Elements: Fall enrollment ADM, OWF poverty counts.

Title V is designed to give LEAs more flexibility in designing and/or supporting innovative programs to increase academic achievement. It is given to public districts, community schools, state-supported schools, vocational school districts, MRDDs, including provisions for services to non-public schools. Prior to 2007-08, mid-year reallocations were done to provide funds for new or rapidly expanding community schools. Funds for these reallocations were derived from those released from other sources (e.g., closed community schools). For 2007-08, the last year for which new Title V funds were allocated, there was no mid-year reallocation, as the per pupil amounts dwindled severely.

This program is not funded for 2008-09.

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Title Title VI-B - Rural and Low Income School Program **CFDA** 84.358

Program Year July 1 to June 30

Data Elements -USDOE National Center for Education Statistics (NCES) locale codes of 6, 7 or 8
-EMIS average daily attendance (previous school year)

Title VI-B Rural and Low-Income Grants: Procedures for Mid-Year Reallocations

ESEA, sections 6221-6224, Subpart 2, Title VI-B Rural and Low-Income Grants are awarded by formula. Tentative allocations are given at the start of the fiscal year for districts that are eligible to receive funds under the RLIS program. A LEA is eligible to receive a grant under this program if: 20 percent or more of the children age 5 to 17 served by the LEA are from families with incomes below the poverty line; all schools served by the LEA have a school local code of 6, 7, or 8 (assigned by the U.S. Department of Education's National Center for Education Statistics); and is not eligible to participate in the Small Rural School Achievement program. Five percent of the state's allocation is reserved for administrative costs and to provide technical assistance to LEAs eligible to receive program funds. The SEA allocates the funds on the basis of the number of children in average daily attendance in eligible LEAs. The agency retrieves the ADA data through the Education Management Information System (EMIS) from the prior school year using an average for the complete school year. A reallocation occurs once the final allocations are officially received from the U.S. Department of Education, usually in the fall. To date, community school LEAs have not been involved because they have not met the rural and low income criteria.

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Title IDEA **CFDA** 84.027

Program Year
July 1 to June 30

Data Elements
- Total ADM
- Poverty (Economic Disadvantage)
- Student Disabilities (as of December 1)

IDEA

The new or expanding community school LEA must provide the Ohio Department of Education (ODE) with the information we need to allocate Part B funds to the community school LEA. Specifically, ODE/Office for Exceptional Children (OEC) will need to know the number of children with disabilities provided special education by the community school LEA, the total number of children enrolled in the community school LEA, and the number of children living in poverty as determined by the SEA. 34 CFR §§300.220-300.250; see also 34 CFR 76.788; Q&A Nos. 9-13.

Each eligible community school that opens for the first time or significantly expands its enrollment on or before November 1 will receive IDEA funds by February 1; and a community school LEA that opens or expands after November 1 but before Feb 1 will receive a pro rata portion of the funds for which it is eligible on or before the data that ODE allocates funds to the other LEAs for the succeeding year. OEC works with the data manager as well as community schools and school finance to obtain the required information to allocation Part B funds. These elements are then utilized in a formula to generate the IDEA allocation. This new allocation is loaded in the CCIP. A letter is sent to each new community school explaining IDEA funds and CCIP information.

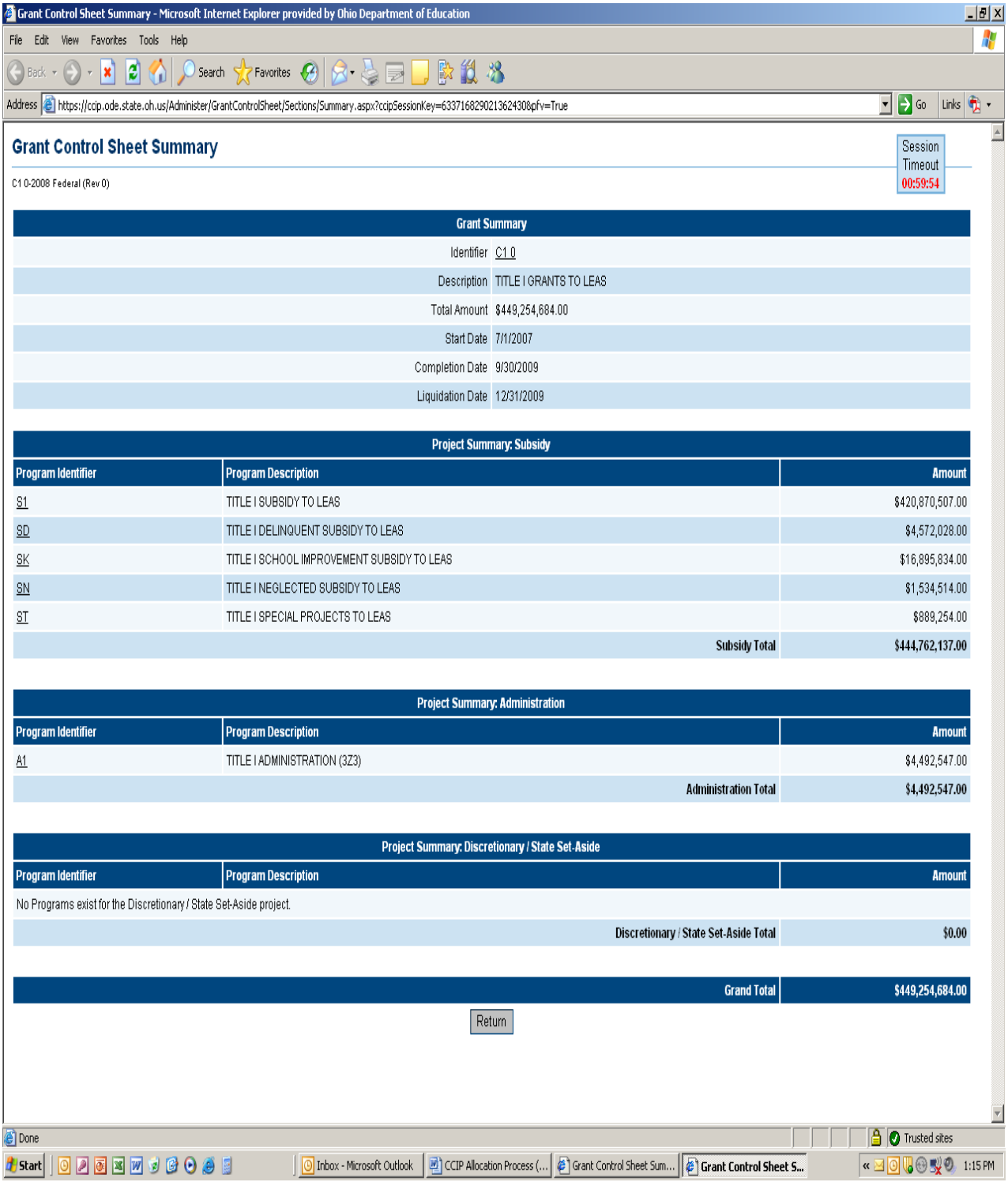
These new schools then submit data through EMIS annually, thus each year their IDEA allocation will be generated in the CCIP and available by July 1.

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Appendix A

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Grant Control Sheet



Grant Control Sheet Summary - Microsoft Internet Explorer provided by Ohio Department of Education

File Edit View Favorites Tools Help

Address https://ccip.ode.state.oh.us/Administer/GrantControlSheet/Sections/Summary.aspx?ccipSessionKey=633716829021362430&pfv=True

Grant Control Sheet Summary

Session Timeout 00:59:54

C1 0-2008 Federal (Rev 0)

Grant Summary	
Identifier	C1 0
Description	TITLE I GRANTS TO LEAS
Total Amount	$449,254,684.00
Start Date	7/1/2007
Completion Date	9/30/2009
Liquidation Date	12/31/2009

Project Summary: Subsidy

Program Identifier	Program Description	Amount
S1	TITLE I SUBSIDY TO LEAS	$420,870,507.00
SD	TITLE I DELINQUENT SUBSIDY TO LEAS	$4,572,028.00
SK	TITLE I SCHOOL IMPROVEMENT SUBSIDY TO LEAS	$16,895,834.00
SN	TITLE I NEGLECTED SUBSIDY TO LEAS	$1,534,514.00
ST	TITLE I SPECIAL PROJECTS TO LEAS	$889,254.00
	Subsidy Total	**$444,762,137.00**

Project Summary: Administration

Program Identifier	Program Description	Amount
A1	TITLE I ADMINISTRATION (3Z3)	$4,492,547.00
	Administration Total	**$4,492,547.00**

Project Summary: Discretionary / State Set-Aside

Program Identifier	Program Description	Amount
No Programs exist for the Discretionary / State Set-Aside project.		
	Discretionary / State Set-Aside Total	**$0.00**

Grand Total	**$449,254,684.00**

Return

Done Trusted sites

Start Inbox - Microsoft Outlook CCIP Allocation Process (... Grant Control Sheet Sum... Grant Control Sheet S... 1:15 PM