Ohio | Department of Education

CCIP Note # 370

Re: Implementation Changes for Federal Grants Under the Every Student Succeeds Act
Date: February 23, 2017
To: Superintendents, Treasurers, Title I Directors/Coordinators and Consolidated Application Contacts

The Every Student Succeeds Act (ESSA) will require some changes to federal grants administration for states, districts and community schools. This document provides information about four key federal funding issues related to ESSA. Your district's federal programs coordinator will receive more details through the Comprehensive Continuous Improvement Plan (CCIP). The four areas are as follows:

1. **Local ESSA Plans and Funding Applications:** Districts and community schools will need to submit additional planning requirements in the funding application that will be available in June in order to access federal funds.
2. **Title II - Funding Changes:** ESSA changes the formula for distributing Title II, Part A funds to school districts. The formula change will have an impact on many districts.
3. **Title IVA - New Program:** ESSA created a new block grant known as the Student Support and Academic Enrichment program.
4. **Nonpublic Equitable Services:** ESSA makes significant changes to the requirements for equitable services and participation by nonpublic entities. As soon as possible, public school districts should start meeting with the leaders of nonpublic schools located in their districts to talk about these changes.

More detailed information about each of these four areas can be found below.

Local District and Community School ESSA Plans
As you may know, state, school district and community schools may submit consolidated plans when applying for federal grant funds under ESSA. *Consolidated* plans include many educational programs, as opposed to requiring a separate plan for each grant.

The U.S. Department of Education does not allow state education agencies to approve any district's consolidated ESSA plan until the federal agency has accepted that state's ESSA plan. Although the Ohio Department of Education (the Department) will submit Ohio's draft plan in April – the earliest opportunity – the federal timeline calls for our plan to be approved *after* the 2017-2018 school year begins. ***The Department is making several revisions to ensure that districts have access to their federal funding this July for the 2017-2018 school year.***

For School Year 2017-2018

The Department will add the new ESSA planning requirements for each Title grant to the CCIP funding application.

- In early March, the Department will provide *templates* and instructions for these planning requirements. This will allow districts to enter their planning information in the templates and simply cut and paste the information into the ESSA federal funding application when it becomes available.

- The Department will open the funding application system in June *after* the state calculates districts' and community schools' allocations.
- Planning requirements for competitive grants will become part of individual competitive grant funding applications.

While 2017-2018 is the first year that ESSA is in effect, the delay in regulations for implementing the law will make this school year something of a transition year. We encourage districts to continue engaging stakeholders on their planning requirements.

- In the future, the Department plans to develop a more streamlined, user-friendly electronic grant planning and funding system. It will take time for the Department to improve the CCIP and other systems to align with ESSA requirements and better coordinate state supports for your district. We appreciate your patience during this transition.

Funding Changes
Some funding allocation methodologies will change due to ESSA. The most notable ones are as follows:

- **Title II, Part A:** ESSA changed the Title II, Part A formula for allocating funds to school districts. Under prior law, Title IIA contained a "hold harmless" provision which guaranteed districts to receive at least as much Title IIA as they received for certain programs in 2001. ESSA eliminates the hold harmless provision and requires districts to now be funded based on the number of 5-17 year old students (20 percent) and the number of low income 5-17 year old students (80 percent). The elimination of the hold harmless provision and shift of emphasis to poverty will impact district allocations of Title IIA starting in school year 2017-2018.

  Congress must approve the federal Fiscal Year 2017 appropriations bill and the U.S. Department of Education must provide state award amounts before the Ohio Department of Education will know district allocation amounts. This will likely be in May or June. District administrators should consider these Title II allocation changes as they plan for the coming school year. **Click for the U.S. Department of Education's non-regulatory guidance on Title II, Part A.**

- **Title IV, Part A:** ESSA created the new Student Support and Academic Enrichment program. This is a new block grant that allows states and districts to use funds for three purposes:
  - Providing a "well-rounded education" to students;
  - Keeping students safe and healthy; and
  - Using technology effectively.

Under ESSA, the minimum district Title IV, Part A allocation is $10,000. Districts are permitted to form consortia for operating their Title IV, Part A programs that may help them get more value from their combined funds.

Any school district that receives a Title IV, Part A allocation of more than $30,000 must:
- Do a needs assessment;
- Spend 20 percent of its appropriation on "well-rounded education" activities; and
- Spend 20 percent on safe and healthy school activities.

The district can spend the remaining 60 percent of its appropriation on all three priorities, including *up to* 15 percent on technology infrastructure (devices, equipment, software and digital content).

Again, the Ohio Department of Education will have district estimates only after Congress approves the Fiscal Year 2017 appropriations bill and the U.S. Department of Education subsequently provides state award amounts. The Department anticipates that most districts and community schools will be held to the minimum Title IV, Part A allocation of $10,000. We strongly encourage districts to review the **Title IV, Part A non-regulatory guidance.** We also encourage districts to talk with each other about opportunities to form consortia and to begin planning their Title IV, Part A programming.

ESSA Nonpublic Equitable Services

Nonpublic schools must have access to equitable services to support students at risk of failing academically, as well as to support those who teach them. ESSA makes significant changes in the requirements for equitable services. As soon as possible, public school districts should start meeting with the leaders of nonpublic schools located in their districts to discuss these changes.

Highlights of equitable services regulations under ESSA:

- There are new requirements regarding the consultation process between the public and private school.
- The proportionate share of Title I funds available for equitable services is based on the total amount of the district's Title I funds *before any allowable expenditures or transfers of funds*.
- The district must obligate funds for equitable services and other benefits in the fiscal year in which the district receives the funds.

The U.S. Department of Education encourages districts to review the **non-regulatory guidance on fiscal changes and equitable services requirements.** The Office of Federal Programs is in the process of making changes to the CCIP and Nonpublic Data System (NPDS) to help districts and private schools determine what constitutes equitable services.

Throughout the spring and summer, the Office of Federal Programs will provide guidance and support to districts and stakeholders on ESSA implementation. In the meantime, we encourage districts to continue working with your stakeholders on federal planning and funding requirements. For more information, please contact the Office of Federal Programs at 614-466-5834 and ask for your federal consultant or email Jeremy Marks, Director of Federal Programs, at Jeremy.Marks@education.ohio.gov.