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MEMORANDUM

TO: Superintendents, CFP Team Leaders, and Business Managers
FROM: Consolidated Federal Program Team
SUBJECT: December, 2013 Technical Assistance Alert
DATE: December 13, 2013

It is the goal of the CFP team at the Agency of Education to provide high quality technical assistance and support to LEA's while fulfilling federal requirements.

Items Included in this Technical Assistance Alert:

- Updated Timeline and Process FAQ for FY15
 - Serving Preschool Children through Title I
 - Supplement not Supplant
 - Using Title I to Purchase Electronic Devices
 - Qualifications of Providers of Professional Learning - with specific reference to technology.
 - Title IIA Evaluation Plans
 - VE2
 - Results from ISA/Common Core Survey
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Updated Timeline and Process FAQ for FY15

Attached:

- CFP Application Timeline
- FAQ for the FY15 Process

[Serving Preschool Children through Title I](#)

Many LEA have been and are starting to use Title I funds for pre-school programs. In October of 2012, the USDOE issued new guidance on the use of Title I funds in early education programs.

There are several ways in which an LEA may use its Title I funds to support a preschool program:

- *School-operated Title I preschool program:* A Title I school may use all or a portion of its Title I funds to operate a preschool program for eligible children.
- *District-operated Title I preschool program:* An LEA may reserve a portion of funds off the top of its Title I allocation to operate a preschool program for eligible children in the district as a whole or in a portion of the district.
- *Coordinating with other preschool programs:* An LEA may use Title I funds to coordinate with and support eligible children enrolled in other public preschool programs, such as Head Start.

Some caveats:

- If Title I funds are used in whole or in part to operate a preschool program, all Title I requirements apply to the program.
- An eligible child is a child on the Title I caseload – one that has been identified by multiple means as at risk of not succeeding in school. If the preschool is run by a Title I Schoolwide school, then all preschooler are eligible students. If every school in the LEA operates as a Title I Schoolwide program, then all the preschoolers in the LEA are considered eligible students.
- Because the reservation of funds by a LEA will reduce the amount of funds available for distribution to participating schools, the LEA must consult with teachers and principals about the reservation. This includes when a LEA decides to operate a LEA-wide preschool by reserving funds off the top of the Title I allocation.

The guidance has over 30 pages of questions and responses. If your LEA or school is using or thinking of using Title I funds for preschool services, read the guidance. It will be useful.

Supplement not Supplant

Federal Title funds must not be used for general expenses required to carry out other responsibilities of State or local governments (34 CFR section 299.2(b)).

A LEA or school may use program funds only to supplement and, to the extent practical, increase the level of funds that would, in the absence of the Federal funds, be made available from non-Federal sources for the education of participating students. In no case may an LEA or school use Federal program funds to supplant funds from non-Federal sources. In the following instances, it is presumed that supplanting has occurred:

- The LEA or school used Federal funds to provide services that the State or LEA was required to make available under other Federal, State or local laws.
- The LEA or school used Federal funds to provide services that the LEA or school provided with non-Federal funds in the prior year.
- The LEA or school used Title I, Part A funds to provide services for participating children that the LEA or school provided with non-Federal funds for nonparticipating children.

These presumptions are rebuttable if the LEA or school can demonstrate that it would not have provided the services in question with non-Federal funds had the Federal funds not been available.

In a Title I schoolwide program, a school is not required to provide supplemental services to identified children. A school operating a schoolwide program does not have to (1) show that Federal funds used within the school are paying for additional services that would not otherwise be provided; or (2) demonstrate that Federal funds are used only for specific target populations. Such a school, however, is required to use funds available under Title I and any other Federal programs to supplement the total amount of funds that would, in the absence of the Federal funds, be made available from non-Federal sources for that school, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency.

Using Title I to Purchase Electronic Devices

Title I funds may be used to purchase electronic devices (e.g. iPads, laptops, Kindles, etc.) for student use if certain requirements are met. The following should be taken into consideration when including investments where all or part of the funds will be used to purchase electronic devices.

- The use is consistent with Title I programmatic requirements and the purchase considered reasonable and necessary to achieve the programmatic goal.
- The LEA is not purchasing the devices in other schools with non-federal funds or in non-Title I schools.
- If a targeted assistance Title I school, the devices may only be used by students on the Title I caseload.
- If a Title I schoolwide, the devices may be used by all students but the device's use must meet the intent of Title I.

- Any investment that includes the purchase of such devices must be consistent with the schoolwide plan or the design of the targeted assistance program, consistent with the technology plan, and based on the needs assessment.
- The use of the devices will help students that are struggling to achieve the standards improve academically.
- As with any investment of Title funds, the investment that includes the purchase of these devices must be evaluated for effectiveness. The evaluation will be reviewed when the LEA is monitored.

Qualifications of Providers of Professional Learning

The term “high-quality professional development” means professional learning that meets the criteria contained in the definition in *Title IX*, Section 9101(34) of ESEA. Professional development includes, but is not limited to, activities that:

- Improve and increase teachers’ knowledge of academic subjects and enable teachers to become highly qualified;
- Are an integral part of broad schoolwide and districtwide educational improvement plans;
- Give teachers and principals the knowledge and skills to help students meet challenging State academic standards;
- Improve classroom management skills;
- Are sustained, intensive, and classroom-focused and are not one-day or short-term workshops;
- Advance teacher understanding of effective instruction strategies that are based on scientifically based research; and
- Are developed with extensive participation of teachers, principals, parents, and administrators.

Our requirement in Vermont is that in order to provide high quality professional development one must be an educator who is well versed in the pedagogy of instruction.

As you may know, we have been requiring confirmation of credentials and capacity to provide professional learning in the area of technology. For this category we assume that the person providing the professional learning has both educational pedagogy and technology expertise. This distinguishes between "technician" (someone adept at the technology) and "technology integration specialist" (a teacher with expertise in the instructional implications of technology). Title funds cannot support a technician.

Title IIA Evaluation Plans

Reminder: If you have not submitted your Title II, Part A investment evaluation plan, please do so ASAP. They were due in September! In the future I will not approve any amendments until I have the plan in hand. Given that this was the first year of the request I decided to give you some leeway. Thank you. M.C. Moran, Program Manager, Professional Learning.

VE2

Benefits of joining the CFP Group at the Vermont Educator Exchange (VE2):

- Workshop materials are posted on the site in a timely manner (Newbie training, spring conference).
- Articles from journals such as Learning Forward and Educational Leadership are posted that have relevance to your work.
- Tools are being developed on a regular basis to support your work and can be found on VE2. For example I recently added a worksheet based on Guskey's Levels of Impact that you can use to write your evaluation plans.
- Examples of shared practice will be posted including evaluation plans.
- The group provides an opportunity for you to post questions and/or submit requests for information. Why reinvent the wheel if someone has a great idea or resource that may be helpful to you!

Results from ISA/Common Core Survey

On November 11th we asked you to respond to two questions related to Interactive Strategies Approach (ISA) and a "general" status of your CCSS implementation. The information gathered will help to inform our professional learning agenda at the Agency of Education.

As promised we are providing a summary of results based on 39 responses:

1. Implementation of Interactive Strategies Approach (ISA):
 - Not involved: 15
 - No comment: 6
 - Interested in learning more about the model: 4
 - Have engaged in research/study of strategy: 9
 - Initial implementation by trying out components of model: 3
 - Full implementation to some degree: 2
2. Developed of Units and Lessons aligned to CCSS

- No comments: 5
- Awareness: 1
- Individual teachers but not working on unit level as a district as yet: 2
- Coordinated development work is in progress: 18
- Units and Lessons being piloted this year to some degree: 9