

## MEMORANDUM

TO: Superintendents, Principals, Curriculum Coordinators  
FROM: Rebecca Holcombe, Secretary of Education *RH*  
COPY: Vermont Superintendents Association, Vermont Principals' Association  
Vermont School Boards Association, VT-National Education Association  
SUBJECT: Support for Extended Learning Opportunities  
DATE: July 15, 2016

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We have received several queries about how to best support extended learning opportunities for our children, including summer learning and extended day or extended time programs for students in grades PK-12.

With this memo, I am reminding you that not only are Title dollars allowed to be used for this purpose-- **extended learning is a good use of these funds**. In particular, we know that our most vulnerable students need more time in socially responsive, supportive, high-quality and developmentally appropriate learning environments. Without that extra time, we will struggle to narrow our achievement gaps.

There are many pathways towards building high-quality extended day programs that may occur in the morning, after school and during the summer. In general, research supports providing access to substantial extended time across the year, provided by skilled leaders and staff. Quality opportunities typically involve a daily diversity of engaging content choices, food, and exercise. Successful programs in Vermont may choose to start small, yet can develop with a multi-year commitment and investment strategy.

Our Consolidated Federal Programs (CFP) team has provided guidance on how Title I funds can be used to support extended learning opportunities in both targeted assistance Title I schools and in Title I schoolwide programs.

In addition, our 21C team and CFP team have worked hard to help programs determine how to braid funds to leverage the greatest service benefit. In addition to Title and 21C dollars, many programs use other federal funds (from the Child Nutrition program, for example), as well as local and private funds to support extended learning time programs.

Public schools are a place where every child should have access to the support he or she needs to thrive and take advantage of the best opportunities to learn that we can provide, regardless of need, disability, language status or race. We appreciate all you do to make this aspiration real for all the children who need your support.

Please see below for links to resources and guidance that will help you figure out how to use various funding streams to ensure our children have the support and opportunities to learn that we know they need. For more information on using Title I or 21C funds, contact Mary Mulloy at [mary.mulloy@vermont.gov](mailto:mary.mulloy@vermont.gov) or Emanuel Betz at [emanuel.betz@vermont.gov](mailto:emanuel.betz@vermont.gov).

<http://education.vermont.gov/documents/edu-cfp-title-1-cfp-allowable-activities.pdf>

<http://vermontafterschool.pbworks.com/w/file/100822843/21c%20statewide%20funding%20sources%202015.xlsx>

From the “[Technical Assistance Alerts](#)” sent out by the Consolidated Federal Programs team:

#### 1/30/14 - [Use of Title I funds for Afterschool](#)

The intent of Title I is for all children to become proficient in the State’s academic achievement standards and to provide supplement supports for those students that are struggling to meet the State’s standards. Afterschool programming can be an important component of helping students academically and closing the achievement gap in a school or LEA. Title I funds can be used in afterschool programs but not for all costs. Below are the 3 most common forms of afterschool programming using Title I funds:

1. In a Targeted Assistance Title I school, the school may offer an afterschool program for those students who are on the Title I caseload (those students that have been assessed by multiple means to be academically disadvantaged). In this case, Title I funds may be used to fund almost all aspect of the program as long as it is academic in nature.
2. In a Schoolwide Title I school, the school may offer an afterschool program for all of its students. In a Schoolwide model, all students are considered to be Title I students. Again, Title I funds may be used to fund almost all aspects of the program as long as it is academic in nature AND the strategy of providing extra academic supports through an afterschool program is outlined in the school’s Schoolwide plan.
3. Some LEAs or schools operate 21st Century Community Learning Center afterschool programs. LEAs or schools may use their funds as outlined above. If the program is associated with a Targeted Assistance school, then Title I funds may be used to fund

academically-oriented services for the Title I caseload students only. If associated with a Schoolwide school, all students may participate but the funds are limited to providing the academic portion of the afterschool program – supplemental instruction, homework club, etc. If a LEA operates the afterschool program, then it must be operated as a Title I Targeted Assistance model unless all schools in the LEA are Schoolwides. Title I funds may not be used as blanket support for a summer or afterschool program. The LEA should work in partnership with the program to determine what costs are allowable and under Title I and allocate expenses to particular high quality offerings. . Records, including time and effort if applicable, must be maintained to verify that the Title I funds are spent in accordance with the requirements outlined above.

#### 10/17/14 – [Homework Clubs](#)

A basic tenet of Title I is to improve student academic achievement by using effective methods and instructional strategies that are based on scientifically based research and in doing so, “give primary consideration to providing extended learning time, such as an extended school year, before- and after-school, and summer programs and opportunities.” Homework clubs that enable students to have high quality instruction in an after-school setting is an allowable use of Title I funds. However, if the homework club is designed more like a study hall with little high quality instruction given or available, that is not an allowable use of Title I funds. If there are questions if an activity is allowable, please call Mary Mulloy at 479-1226 or Beth Meyer at 479-3112.

#### From 10/1/2013 – [Title I Investments Allowed for After School Programs](#)

While extended day activities (read “after school”) are allowed, indeed encouraged, by Title I, there are parameters of which one must be aware. Title I may only be used to support the academic component of extended time programs. While oversight of said academics is permitted, it must be prorated so as to align with the percentage (or less) of academic activities in relation to non-academic activities. Also, Title I dollars may not be used to administer extended time programs that have no Title I dollars paying for direct academic services to students, even in cases where said program includes an academic component.