Writing Approvable CFP Investments

In the Consolidated Federal Programs (CFP) grant application, requests for funding are referred to as “investments.” The terminology is deliberate. An investment reflects a long-term commitment of resources in order to meet defined goals for improving student outcomes and staff capacity. As such, purposes, activities, strategies and interventions described in CFP investments should be reflected in an LEA or school’s Continuous Improvement Plan.

Writing an Investment

Begin with the specific **purpose** of the proposed investment. The purpose should be clearly connected to a key data finding, priority need or goal for improvement represented in the school or LEA’s data inventory and CIP. The more detailed the statement of purpose, the more likely an investment is to be approved through lenses of being allowable, reasonable and necessary.

**Example #1**: “In order to build teacher capacity to make clear and specific connections between data and effective instruction,…”

**Example #2**: “In order to enable staff to better recognize and meet the unique needs of students who have experienced trauma,…”

**Example #3**: “In order to increase high school student engagement by connecting learning to post-graduation opportunities,…”

**Example #4**: “In order to improve reading fluency of students in grades K-2 most at-risk to not meet state standards,…”

Next, describe the specific **activities, strategies or interventions** for which funds are being requested. As with the purpose, the more clear and specific the description is the more easily it can be determined if the investment is allowable, reasonable and necessary. Provide specifics such as the number of teachers who will be participating, the number of day and/or hours of consulting or training, or the number of students served. Do not name specific vendors, venues, dates, contractors or names of hires, for risk of circumventing necessary procurement requirements or incurring disallowed costs should specific providers change.

**Example #1 (cont.)**: “…a full-time K-6 instructional coach to provide classroom-embedded professional learning on evidence-based practices through research, peer observation, feedback and modeling.”

**Example #2 (cont.)**: “…an outside consultant to provide four full days of professional development for all middle school staff on trauma-informed practices and four full days of classroom observation and feedback.”

**Example #3 (cont.)**: “…a team of six staff members will work beyond contract twice a month for two hours to design a work-based learning initiative in partnership with local businesses.”

**Example #4 (cont.)**: “…a part-time reading interventionist to provide push-in small group instruction using Orton-Gillingham approaches in six classrooms, three times per week.”

In the past, CFP team leaders have been asked to identify “**cost categories**” as a final step in writing an investment, such as “costs include stipends, benefits, mileage and instructional materials.” **This is no longer required nor wanted**, and including this information may complicate the review of an investment, leading to denial. Rather, short explanations of an investment’s costs will appear in the budget details section of the CFP application.

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| **Do** | **Do not** |
| Write investments that are substantiated by your CIP goals and change ideas. This does not mean that the investment description must be included in the CIP. It does mean that it must be clear to the reader that investments are being requested to meet the needs and goals stated in the CIP.  Write investments that include a clear statement of purpose and descriptions of specific activities, strategies and interventions.  Include an FTE for salaried positions.  Gain pre-approval from the state Secretary of Education for any investments that include travel outside of the continental U.S.  Make sure that all supporting documents, such as service delivery plans, job descriptions and schedules for coaches, are uploaded to GMS, as well as a Scope of Work for outside consultants and contractors that exceed market price.**\***  Include benefits in the same investment as associated salaries or stipends. Please do not write separate investments for benefits. | Include “cost categories” in the investment description. Rather, include this information on the budget details page.  Include dollar amounts in the investment description. Rather, include this information on the budget details page.  Include an FTE for stipends/hours beyond contract or for outside, third-party service providers.  Include names of specific vendors, venues, dates, contractors or hires, as this may run contrary to procurement requirements or may lead to disallowed costs if provider or strategy changes.  Include citations for evidence base in the investment description.  Reference uploaded documents in lieu of a description. You may upload supporting documents if you choose, but not in place of a detailed, specific investment description.  Use the terms “coach” or “coaching” unless an FTE is involved. Use “consult”, “consultant” or “consultancy.” |

## Investments for Professional Development

When writing an investment for professional development, the following information must be included in the investment description for the investment to be approved:

* The number of staff participating in the professional development activity (i.e. 15 teachers)
* The duration of the professional development activity (i.e. 2 hours, 1 day, 5 days, 2 hours a month for 10 months, etc.)
* The number of consultants to be contracted and the number of days (i.e. 2 consultants for 2 half days)
* The number of substitute teachers needed and duration (i.e. 5 substitute teachers for 2 half days each)
* Any time BCO (i.e. 5 hours BCO for 5 teachers for a total of 25 hours BCO)

It is understood that it may be difficult to know exactly how many participants there may be in a professional development activity, or the specifics of the training. If this is the case, please make your best estimate and submit an amendment if arrangements change.

## Investments for Consultants

Part of the consideration for funding is “reasonable cost.” This includes “market prices for comparable goods or services in the geographic area” (EDGAR). The market price for external consultants in Vermont shows a range of $350.00 to $2000.00 per day. These prices reflect inclusion of all related expenses, such as materials and travel. Funds spent on external trainers, consultants, or contractors that exceed this fair market value must include a Scope of Work to be included as a supporting document in your application for funding. The Scope must include:

• The purpose of the activity.

• The timeline for the specific activities/deliverables.

• The costs associated with the project activities.

• Rationale for exceeding fair market price.

• The process by which the service outcomes will be measured.

Subgranting

LEAs will now need to indicate whether a portion of an investment’s total cost is to be subgranted to a member school district. This is done by choosing “yes” or “no” in the right-most column of the investment description page. If “yes” is selected, indicating subgranting, one or more of the budget detail line items associated with that investment must be coded as **Object Code 800**.

Creating Budget Details

A budget detail line items describes a specific cost in a specific expense category, needed to implement a portion of an investment. **The CFP Team Leader and Business Manager should work collaboratively** to ensure that all needed costs, assigned to the correct Object and Function Codes, are represented in the budget details for each CFP investment.

Each budget detail must include a brief, but clear, description of the expenditure. This description will usually be 3-5 words long, identifying exactly, and only, what will be paid for by that line item. Expenditure descriptions that are not specific or are inaccurate (not correctly aligned to the Object Code chosen) will lead to an unapproved investment.

**Example #1**: “In order to build teacher capacity to make clear and specific connections between data and effective instruction, a full-time K-6 instructional coach to provide classroom-embedded professional learning on evidence-based practices through research, modeling, PDSA cycles peer observation and Networked Improvement Community.”

**Budget Details:**

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| --- | --- | --- | --- |
| Object Code | Investment Number | Expenditure Description | Funds |
| 100-Personal Services Salaries | 1 | K-6 Coach Salary | 60,749.00 |
| 200-Personal Services Benefits | 1 | K-6 Coach Benefits | 22,655.00 |
| 500-Other Purchased Services | 1 | K-6 Coach Mileage between schools | 750.00 |
| 600-Supplies | 1 | K-6 Coach Materials | 500.00 |

**Example #2:** “In order to enable staff to better recognize and meet the unique needs of students who have experienced trauma, an outside consultant to provide four full days of professional development for all middle school staff on trauma-informed practices and four full days of classroom observation and feedback.”

**Budget Details:**

|  |  |  |  |
| --- | --- | --- | --- |
| Object Code | Investment Number | Expenditure Description | Funds |
| 100-Personal Services Salaries | 2 | Stipends for staff work BCO | 12000.00 |
| 200-Personal Services Benefits | 2 | Benefits for staff work BCO | 1800.00 |
| 300-Purchased Professional and Technical Services | 2 | Trauma Consultant | 5500.00 |

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| **Do** | **Do not** |
| Work collaboratively with Business Managers to ensure that all needed costs are included in budget details and are aligned to correct Object Codes.  Write specific expenditure descriptions identifying exactly, and only, what will be paid for by that line item.  Include benefits (Object Code 200) for any investment that features salaries or stipends (Object Code 100). | Write expenditure descriptions that are not specific, such as by cutting-and-pasting investment descriptions.  Group costs that belong under different Object Codes, such as professional development registration (Object Code 300) and travel/lodging costs (Object Code 500).  Use Object Code 730 for supplies that cost less than $5,000 per single unit. |