

Student Support and Academic Enrichment Grant (SSAE)



Technical Assistance Webinar

02/01/2019

1:00 PM – 2:30 PM

A G E N D A

1 – INDIRECT COSTS

- APPROVED INDIRECT COST RATES
- CORRECT CALCULATION

2 – ADMINISTRATIVE COSTS

- PERCENTAGE REQUIREMENTS
- WHEN AND WHERE TO CALCULATE

3 – EQUITABLE SERVICES

- NON-PUBLIC PARTICIPATION
- DOCUMENTATION – *Affirmation of Consultation Forms*
- 20% CALCULATIONS
- 15% RULE

4 – REPORTING UPDATES

- INTERIM PROGRESS REPORTS
- CONSOLIDATED STATE PERFORMANCE REPORT (CSPR)
- ANNUAL REPORT TO MSDE
- LIST OF NON-PUBLIC ACTIVITIES – (STATE BOARD REQUEST – DUE 02/06/19)

5 – SITE VISITS

- SPRING 2019 SCHEDULE
- FORMS

6 – FAQ UPDATES

INDIRECT COSTS

- APPROVED INDIRECT COST RATES (ICR)
 - Rate negotiated between the LEA and the MSDE
 - Make sure you are using your approved ICR
- CORRECT CALCULATION
 - Total Grant – Equipment – Transfers= Base (or net assessable amount)
 - $(\text{Base} / 1 + \text{ICR}) \times \text{ICR}$
 - **Example** = Total Grant = \$100,000
 - Equipment = \$5,000
 - Transfers = \$25,000
 - ICR = 3.5%
 - $\$100,000 - \$5,000 - \$25,000 = \$70,000$ (Base)
 - $(\$70,000 / 1.035) \times .035 =$ **\$2,367.15 (Indirect Costs)**
 - Remember to subtract Administrative Costs before computing the Equitable Services share

ADMINISTRATIVE COSTS

- PERCENTAGE REQUIREMENTS
 - Do not subtract administrative costs before calculating 20% for **Well-Rounded Education** and 20% for **Safe and Healthy Schools**
 - 20% for **Well-Rounded Education** and 20% for **Safe and Healthy Schools** **are determined from the original allocation**
- Do not subtract administrative costs **BEFORE** calculating **Indirect Costs (IC)**
 - Calculate IC first and then subtract IC from the total grant before computing administrative costs
- Remember to subtract administrative costs before calculating Equitable Services share

EQUITABLE SERVICES

- USED – *“Non-publics do not have to receive Title I services in order to be eligible for Title IV, A”*

Eligible Student =

- Attends school in an area served by an SEA or LEA receiving financial assistance under a program specified in subsection (b)
- *(b) = This section applies to programs under:*
 - (A) – part C of Title I*
 - (B) – part A of Title II*
 - (C) – part A of Title III*
 - (D) – part A of Title IV***
 - (E) – part B of Title IV*
- Private school students who are enrolled in nonprofit (**i.e., have non-profit status**) private elementary and secondary schools, including those in religiously affiliated schools, located in the LEA generally are eligible to receive services.

EQUITABLE SERVICES (Continued)

- REMINDERS:
 - When completing your Master Plan be sure to include Affirmation of Consultation forms with your Attachment 9 as part of your documentation
 - Subtract any administrative and indirect costs prior to computing the Equitable Services share
- Affirmation of Consultation =
 - Opportunity for private school officials to indicate whether **timely** and **meaningful consultation** has not occurred or that the program design is not equitable with respect to eligible private school children.
- 20% Calculations
 - *Non-public spending that falls under [4.0] – Well-Rounded Education & [5.0] – Safe and Healthy Students must be counted toward your LEA's 20% calculations in both content areas*
 - *Consider asking non-publics to complete a budget narrative to demonstrate which content areas their spending falls under*
- 15% Rule
 - *Non-public spending on Infrastructure must be counted toward your LEA's 15% cap for spending in content area [6.0] – Effective Use of Technology*

Reporting Updates

- STATE BOARD REQUEST
 - Please remember to complete your list of Non-Public Activates per the State Board request
 - Due: **Wednesday, 02/06/2019 on Google Form**
 - Google Form Link:

[List of Non-Public Activities](#)

Reporting Updates – (provided at the 12/07/18 USED Combined Programs Federal Meeting)

- LEAs will have to complete separate interim progress reports for FY 18 and FY 19 simultaneously
- Consolidated State Performance Report (CSPR)
 - Title IV, Part A is currently not included in the CSPR but will be added for the 2018-19 SY
 - CSPR submission date is typically February of the following year (2020)
 - Draft Indicators include: **(more guidance to come)**

SEA	Content Area	Amount of Funds Spent
	Well-Rounded Education	
	Safe and Healthy Students	
	Effective Use of Technology	

LEA	Content Area	Number of LEAs of Spending Funds
	Well-Rounded Education	
	Safe and Healthy Students	
	Effective Use of Technology	
	Any (more guidance to come)	

ANNUAL REPORT to MSDE

TITLE IV, PART A - ANNUAL REPORT to MSDE	
REPORT PURPOSE: ESEA Section 4106(e)(2)(F) requires that local educational agencies (LEAs) report annually to the State on how funds are being used under this subpart to meet the requirements of subparagraphs C through E. Please note that the percentages requested below must take into account your LEA's nonpublic spending in each content area.	
LEA: <input type="text"/>	POC: <input type="text"/>
Grant Year: <input type="text"/>	
Grant Name: <input type="text"/>	Grant Number: <input type="text"/>
Total Allocation: <input type="text"/>	
WELL-ROUNDED EDUCATION	
C – Well-Rounded Education – Use not less than 20 percent of funds received under this subpart to support one or more activities authorized under section 4107.	
C – 1. Based on the FY 18 Title IV, Part A allocation, what is the exact amount spent in Well-Rounded Education? <i>(Please provide the most up-to-date amount possible)</i>	C -1. Exact Amount Spent <input type="text"/>
C – 2. Based on the FY 18 Title IV, Part A allocation, what percentage of the entire allocation was spent in Well-Rounded Education? <i>(Please provide the most up-to-date % possible)</i>	C -2. Percentage Spent <input type="text"/>
C – 3. Based on the reported percentage from C – 1, please provide a brief summary of the activities funded under Well-Rounded Education. <input type="text"/>	
SAFE AND HEALTHY STUDENTS	
D – Safe and Healthy Students – Use not less than 20 percent of funds received under this subpart to support one or more activities authorized under section 4107.	
D – 1. Based on the FY 18 Title IV, Part A allocation, what is the exact amount spent in Safe and Healthy Students? <i>(Please provide the most up-to-date amount possible)</i>	D -1. Exact Amount Spent <input type="text"/>
D – 2. Based on the FY 18 Title IV, Part A allocation, what percentage of the entire allocation was spent in Safe and Healthy Students? <i>(Please provide the most up-to-date % possible)</i>	D -2. Percentage Spent <input type="text"/>
D – 3. Based on the reported percentage from D – 1, please provide a brief summary of the activities funded under Safe and Healthy Students. <input type="text"/>	
EFFECTIVE USE OF TECHNOLOGY	
E - Effective Use of Technology - use a portion of funds under this subpart to support one or more activities authorized under section 4109(a), including an assurance that the local education agency (LEA) will comply with 4109(b).	
E – 1. Based on the FY 18 Title IV, Part A allocation, what is the exact amount spent in Effective Use of Technology? <i>(Please provide the most up-to-date amount possible)</i>	E -1. Exact Amount Spent <input type="text"/>
E - 2. Based on the FY 18 Title IV, Part A allocation, what percentage of the entire allocation was spent in Effective Use of Technology? <i>(Please provide the most up-to-date % possible)</i>	E -2. Percentage Spent <input type="text"/>
E - 3. 4109(b) - A local education agency shall not use more than 15 percent of funds for purchasing technology infrastructure as described in subsection (a)(2)(B), which shall include technology infrastructure purchased for the activities under subsection (a)(4)(A). <i>(Please provide the most up-to-date % possible)</i>	E -3. Percentage Spent <input type="text"/>
E - 4. Based on the reported percentage from E - 1, please provide a brief summary of the activities funded under Effective Use of Technology. <input type="text"/>	

SITE VISITS

2018 - 2019 Schedule

LEA:	Tentative Visit Date:	Time:	Date Documents Due:
St. Mary's	2/11/2019	1 PM - 3 PM	2/4/2019
Baltimore County	3/01/2019	1 PM - 3 PM	2/22/2019
Somerset	3/20/2019	1 PM - 3 PM	3/13/2019
Washington	4/10/2019	9 AM - 11 AM	4/3/2019
Carroll	5/8/2019	9 AM - 11 AM	5/1/2019
Talbot	5/29/2019	1 PM - 3 PM	5/22/2019
Anne Arundel	6/26/2019	9 AM - 11 AM	6/19/2019
Queen Anne's	7/10/2019	1 PM - 3 PM	7/3/2019
Garrett	7/24/2019	1 PM - 3 PM	7/17/2019

- This is a collaborative learning process!
- Visits will last approximately 2 hours to discuss the state of the grants , oversight, and best practices
- Monitoring forms and artifacts (samples) are to be submitted at least a week prior to your meeting date
 - Forms to be completed based upon the FY 18 grant

SITE VISIT FORMS

- Monitoring Visit Evaluation Form

- To be completed and submitted a week prior to the scheduled meeting for the FY 18 Grant

Local School System:		Fiscal Year:
Title IV, Part A Coordinator:		
Phone #:	Fax #:	Email:

Directions: For each section, please provide support such as a narrative or statement, an artifact (paper or electronic), an internet link, copies of records, or other documents. Please reflect on the activities, objectives, and outcomes listed in your previously submitted plans (Attachment 9). Please use the **bolded and italicized** prompts to prepare your responses.

Required and Approved Activities	LEA Response: Narrative or Statement & Evidence or Artifact
1.0: CONSULTATION - (Required)	
1. How has the LEA <i>demonstrated meaningful consultation</i> with parents, teachers, principals, and other school leaders, specialized instructional support personnel, students, community-based organizations, local government representatives (which may include a local law enforcement agency, local juvenile court, local child welfare agency, or local public housing agency), and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of the Title IV, Part A. (ESEA section 4106 (c)(1))?	
2. How has the LEA <i>demonstrated ongoing consultation</i> to continually improve the local activities in order to meet the purpose of this subpart. (ESEA section 4106 (c)(2))?	
3. How has the LEA <i>demonstrated coordinated implementation of local activities with other programs</i> , strategies, and activities being conducted in the community (ESEA section 4106 (c)(2))?	

SITE VISIT FORMS

- Annual Report Form (one pager) – created around USED reporting
- To be completed and submitted a week prior to the scheduled meeting for the FY 18 Grant

TITLE IV, PART A - ANNUAL REPORT to MSDE	
REPORT PURPOSE: ESEA Section 4106(c)(2)(F) requires that local educational agencies (LEAs) report annually to the State on how funds are being used under this subpart to meet the requirements of subparagraphs C through E. Please note that the percentages requested below must take into account your LEA's nonpublic spending in each content area.	
LEA: <input type="text"/>	POC: <input type="text"/>
Grant Year: <input type="text"/>	
Grant Name: <input type="text"/>	Grant Number: <input type="text"/>
Total Allocation: <input type="text"/>	
WELL-ROUNDED EDUCATION	
C – Well-Rounded Education – Use not less than 20 percent of funds received under this subpart to support one or more activities authorized under section 4107.	
C – 1. Based on the FY 18 Title IV, Part A allocation, what is the exact amount spent in Well-Rounded Education? <i>(Please provide the most up-to-date amount possible)</i>	C -1. Exact Amount Spent <input type="text"/>
C – 2. Based on the FY 18 Title IV, Part A allocation, what percentage of the entire allocation was spent in Well-Rounded Education? <i>(Please provide the most up-to-date % possible)</i>	C -2. Percentage Spent <input type="text"/>
C – 3. Based on the reported percentage from C – 1, please provide a brief summary of the activities funded under Well-Rounded Education. <input type="text"/>	
SAFE AND HEALTHY STUDENTS	
D – Safe and Healthy Students – Use not less than 20 percent of funds received under this subpart to support one or more activities authorized under section 4107.	
D – 1. Based on the FY 18 Title IV, Part A allocation, what is the exact amount spent in Safe and Healthy Students? <i>(Please provide the most up-to-date amount possible)</i>	D -1. Exact Amount Spent <input type="text"/>
D – 2. Based on the FY 18 Title IV, Part A allocation, what percentage of the entire allocation was spent in Safe and Healthy Students? <i>(Please provide the most up-to-date % possible)</i>	D -2. Percentage Spent <input type="text"/>
D – 3. Based on the reported percentage from D – 1, please provide a brief summary of the activities funded under Safe and Healthy Students. <input type="text"/>	
EFFECTIVE USE OF TECHNOLOGY	
E - Effective Use of Technology - use a portion of funds under this subpart to support one or more activities authorized under section 4109(a), including an assurance that the local education agency (LEA) will comply with 4109(b).	
E – 1. Based on the FY 18 Title IV, Part A allocation, what is the exact amount spent in Effective Use of Technology? <i>(Please provide the most up-to-date amount possible)</i>	E -1. Exact Amount Spent <input type="text"/>
E – 2. Based on the FY 18 Title IV, Part A allocation, what percentage of the entire allocation was spent in Effective Use of Technology? <i>(Please provide the most up-to-date % possible)</i>	E -2. Percentage Spent <input type="text"/>
E – 3. 4109(b) - A local education agency shall not use more than 15 percent of funds for purchasing technology infrastructure as described in subsection (a)(2)(B), which shall include technology infrastructure purchased for the activities under subsection (a)(4)(A). <i>(Please provide the most up-to-date % possible)</i>	E -3. Percentage Spent <input type="text"/>
E – 4. Based on the reported percentage from E - 1, please provide a brief summary of the activities funded under Effective Use of Technology. <input type="text"/>	

FAQ UPDATES – (USED RESPONSES 11/19/2018)

1. When a public school system determines their non public allocation - that usually goes on a budget line itself- so does the cost of the services provided come out of the LEA's percentage limitation? Specifically, if the services include hardware, does that come out of 15% of the LEA Technology allocation? Or are the non publics free from the percentages, therefore they can have any service that is an allowable cost and since the whole non public allocation is a budget line, the breakdown within the non publics does not impact the LEA?

The statute states that LEAs must “use not less than 20 percent of funds received under this subpart” for each of section 4107 (well-rounded education) and 4108 (safe and healthy students) and “use a portion of funds received under this subpart” for section 4109 (effective use of technology). **This language -- “funds received under this subpart”-- indicates that these distribution requirements apply to an LEA’s total allocation. Accordingly, an LEA must meet the percentage distribution requirements based on its total allocation.** LEAs have also asked whether the distribution requirements must, in addition, be met separately with the portion of funds spent for equitable services for private school students. There is no such requirement in the statute. **Any LEA funds spent on technology infrastructure (whether for public or private school) are attributed to the LEA’s 15% allowance for technology infrastructure.**

FAQ UPDATES - (USED RESPONSES 11/19/2018)

2. If a non public who said they wanted to participate but does not spend their funds in the fiscal year- what happens? Do the funds go back in the large pot? Stay in a non public pot? (LEAs have the 27 months to spend, but even then, if a non public didn't spend their funds- what do we do with those funds?)

In general, if an LEA provided equitable services for private school students in any given year, any carryover funds for services to private school students would be considered additional funds for that program for public and private school students in the subsequent year. Those funds then would be used, along with any other carryover funds, for both public and private school students on an equitable basis. This situation might occur, for example, if private school students and teachers did not fully participate in the ESEA program (e.g., private school teachers opted out of a proposed professional development activity), even though an equitable program was planned and offered for those students and teachers.

However, if the LEA did not provide equitable services for private school students in a given year and, as a result, there are funds remaining that should have been expended for equitable services for private school students, the LEA should use those carryover funds for private school students in the subsequent year. Those funds would be in addition to the funds that the LEA uses for private school students out of the subsequent year's allocation. This situation might occur, for example, if the LEA failed to notify or consult with private school officials about the availability of the ESEA program, or if there was a delay in the implementation of an equitable program.

(Visit FAQ F-9 from the [Non-Regulatory Guidance Regarding Equitable Participation of Non-Public students](https://www2.ed.gov/policy/elsec/guid/equitableseguidance.doc) at :<https://www2.ed.gov/policy/elsec/guid/equitableseguidance.doc>)

FAQ UPDATES - (USED RESPONSES 11/19/2018)

3. Our question is does a non-public school have to receive Title I services to be eligible for Title IV? Be Title I eligible? Have a Title I eligible student? Essentially, we are trying to determine whether all non-publics can participate in Title IV.

Non-publics do not have to receive Title I services in order to be eligible for Title IV, A.

4. Can the LEA reimburse the nonpublic(s) after they have received invoices?

No, because the LEA must remain in control of the funds.

5. Are LEA administrative costs to be taken out before accounting for the 20%, 20%, and 15% allowances?

No. The percentages are based upon the LEA's total allocation.

6. Are indirect costs to be taken out before accounting for the 20%, 20%, and 15% allowances?

No. The percentages are based upon the LEA's total allocation.

FAQ UPDATES - (USED RESPONSES 11/19/2018)

7. Our State runs new enrollment counts for the current school year on September 30th. Title IV, Part A applications are due October 15. Thus, there is not a lot of time for the LEAs to calculate updated per pupil allocations regarding equitable services shares with their participating private schools. Does USED recommend a date for LEAs to run enrollment counts for both their LEA and their participating private schools?

This is an issue for the State and locals to determine. **MD will use previous year 09/30 Enrollment.**

8. Is it permissible for LEAs to include students in grades below Kindergarten in their equitable services counts?

PreK can be included if PreK is included in the State definition of “elementary education.” **If your LEA includes PreK with other initiatives then you can include.**

9. We discussed if food purchases were “reasonable and necessary” for the operation of the after-school club or activity, but he would like to know if food costs (in-and-of themselves) are allowable. Is food purchased for an after-school club or activity connected to the grant, e.g, a robotics club or competition, allowable?

Food can be allowable if reasonable and necessary for the activity; however, LEA/school must demonstrate that the food is essential for completing the activity.

FAQ UPDATES - (USED RESPONSES 11/19/2018)

10. Even though there is a transportation prohibition that applies to the Title IV-A program, can Title IV-A funds be used to cover the transportation costs of individuals on official travel status attending a PD session? Is this because of §200.474 of the Uniform Guidance?

As we've clarified, Section 8526 of the ESEA prohibits "transportation" costs "unless otherwise authorized under this Act." We interpret the prohibited "transportation" to refer only to costs associated with getting students to and from school for the regular school day (these costs would also generally be unallowable due to supplanting concerns) and not costs associated with transporting students to an allowable Title IV, Part A activity.

11. When factoring the 20% rule for well-rounded education and safe and healthy student content areas, does the LEA compute that percentage after the amount for equitable services is removed or before from the total allocation?

It's based on the total LEA allocation.

FAQ UPDATES - (USED RESPONSES 11/19/2018)

12. Are costs allowable for student interns? These are interns at the LEA level. The high school interns would be working along side art teachers in the summer for a summer enrichment activity with elementary students. They would help design and facilitate the lessons, as well as mentor the elementary school students. It is requested from the LEA in their application. They want to pay 25 interns \$300 a piece for a total of \$7,500. Please let me know if you need any additional information.

There is no prohibition on paying stipends to students, subject to all the regular allowability considerations and any relevant state/local policies.

13. Are nonpublic, or private schools, bound to the same % requirements as the LEAs, i.e, for an allocation > \$30,000 at least 20% must be spent on well-rounded, at least 20% must be spent on safe and healthy students and a % must be spent in the effective use of technology?

No, the distribution requirements apply at the LEA level.

14. If it does not supplant other previously available local, non-Federal funding, can expenses be used to pay for CTE licensure exams?

There is no prohibition on using Title IV, A funds for this purpose. However, as with all costs, the SEA must ensure that this use of funds is “reasonable and necessary.”