



NATIONAL FORUM TO
ADVANCE RURAL EDUCATION



TeachUNITED

Maximizing Funding Resources for Small and Rural Schools

NOVEMBER 16-17, 2023
VIRTUAL PRESENTATION

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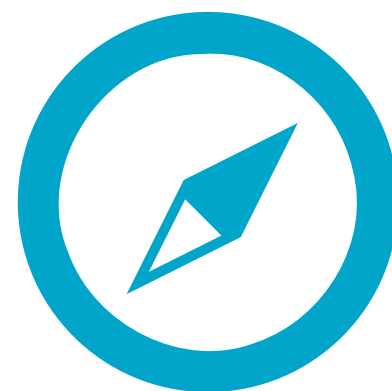
Purpose:

Present strategies to help YOU make the most of your federal REAP funds.

- Navigating the System
- Strategic Money Management
- REAP Sample Activity - Title II-A
- REAP - SRSA/RLIS - Flexibility
- Recap

THIS PRESENTATION IS NOT A SUBSTITUTE FOR THE ADVICE OF YOUR OWN ATTORNEY AND/OR LAW FIRM LICENSED TO PRACTICE LAW IN THE STATE IN WHICH YOU RESIDE. IN READING AND APPLYING FEDERAL LAW, WE RECOMMEND THAT YOU SEEK AND OBTAIN THE ADVICE OF COUNSEL WITH QUESTIONS OF APPLICATION, INTERPRETATION, AND/OR TO ENSURE THAT USE OF THIS INFORMATION IS APPROPRIATE TO YOUR PARTICULAR SITUATION.

Navigating the System





Navigating the System

Procurement

Keep it simple

State Education Agencies:

- have their own processes, timelines, forms, and expectations.
- have the final say regarding approving grant applications, activities, and purchases (allowable, necessary, and reasonable "test").¹

All Federal Programs:

- funds must be used **to supplement, and not supplant**, any other Federal, State, or local education funds (exception for ESSER)

REAP Agency
Contacts



When in doubt, check with your State Education Agency.

¹ Exception: SRSA - managed at the Federal level - same "test" applies.



Navigating the System

Procurement

Keep it simple

Baseline - review your local procurement process & guidelines:

- Make sure it aligns with federal procurement requirements.
- That it describes the process for establishing and authorizing contracts with vendors.
- Does the local school board need to approve purchases at a certain threshold?
- Construction contracts have separate federal procurement requirements.

EDGAR² - Federal regulations:

- EDGAR - Education Department General Administrative Regulations
- 2 CFR 200.317 - 200.326

² Education Department General Administrative Regulations (n.d.) Code of Federal Regulations. National Archives and Records Administration. Available at: <https://www.ecfr.gov/> (Accessed: Sept. 20, 2023).



Navigating the System

Procurement

Keep it simple

Simplified Acquisition Threshold = < \$250,000³

Micro-purchase

- Under \$10,000
- No bid or quote process required if the price is considered “reasonable”
- No cost or price analysis required
- Should be distributed among a range of qualified vendors

Small purchase

- Under simplified acquisition threshold (currently \$250,000)
- Price or rate quotes required from an adequate number of sources (e.g. three)
- Should be distributed among a range of qualified vendors

> \$250,000

- Sealed bids
- Competitive proposals
- Noncompetitive proposals (sole source) requires authorization by SEA

³ Legal Information Institute. Cornell Law School. Available at: <https://www.law.cornell.edu/cfr/text/2/200.320> (Accessed: April 4, 2023)

Strategic Money Management





Strategic Money Management

Ask Yourself

Justify Your Need

What has the **highest return on investment** that meets the **greatest need** with the **most impact** for improving student outcomes?

- What's your **broad strategy** that backs up your approach to allocating (federal) funds?
- What **choices will you** make to produce sustainable, equitable, and strategic outcomes?
- What are your remaining **priorities and opportunities** in light of ESSER funds winding down?
- What can you do now that will have **lasting impact** and soften the landing of the ESSER funding cliff?

DID YOU KNOW?

- Funds must be obligated by September 30, 2024⁴
- Define success, measure, **then adjust**

ESSER FAQs



⁴ (2022) Frequently Asked Questions Elementary and Secondary School Emergency Relief Programs Governor's Emergency Education Relief Programs. U.S. Department of Education. Available at: <https://oese.ed.gov/files/2022/12/ESSER-and-GEER-Use-of-Funds-FAQs-December-7-2022-Update.pdf> (Accessed: April 4, 2023).



Strategic Money Management

Ask Yourself

Justify Your Need



School | District

Vision - Goals - Outcomes - Initiatives

- Needs Assessment
- Strategic plan
- Professional development plan
- Educational Improvement plan
- ESSER Use of Funds plan
- Accreditation report



What data are collected that indicates *need*?

- Stakeholder/community/parent surveys
- Student-level assessment data
- Teacher surveys
- Other non-academic data (student and teacher attendance data; behavior/referrals; student engagement; student interest surveys)



Resources

- What resources are underutilized?
- Which resources are outdated?
- What resources are missing or still needed?



REAP ACTIVITY

Sample Activity
REAP| Title II-A





REAP ACTIVITY

Activity
REAP | Title II-A

What has the **highest return on investment** that meets the **greatest need** with the **most impact** for improving student outcomes?

Invest in supporting most impactful student programs

- College and career readiness (including agricultural/environmental programs)
- Student engagement
- Well-rounded opportunities
- Expand what's already working or try something new

Retaining & Attracting Teachers

- Invest in human capital for capacity building and sustainability
- Administrators
- Teacher-leaders
- Early career educators

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REAP ACTIVITY

Sample Activity
REAP| Title II-A

Our [strategic plan](#) prioritizes providing students with a personalized learning experience. However, through classroom observation, we have learned that our early career educators are not embedding personalized learning opportunities into their practice. Therefore, our early career teachers need training and coaching in personalized learning strategies. Impact of training will be evidenced through a) teacher feedback sessions and b) evaluating lesson plans along with witnessing change of practice during c) formal observations and d) walkthroughs. As a result of this experience, teachers will be better prepared to implement personalized learning experiences and able to support other teachers in the school.



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REAP - SRSA/RLIS





Rural Education Achievement Program (REAP)

Joint Application
(RLIS)

Alternative Fund Use
Authority (SRSA)

Transferability

REAP is designed to help rural LEAs use Federal resources more effectively in order to address their unique needs. The formula grant funds and the fund use flexibility available under REAP enable these rural LEAs to participate more fully and effectively in many of the ESEA programs and allow them to provide better educational services to their students (page 1).⁵

General REAP
Information



REAP
Guide for using funds



REAP
Informational Document



⁵ (2021) Informational Document on the Rural Education Achievement Program (REAP). U.S Department of Education. Available at: <https://oese.ed.gov/files/2021/01/19-0043-REAP-Informational-Document-final-OS-Approved-1.pdf> (Accessed: April 4, 2023)



Rural Education Achievement Program (REAP)

Joint Application
(RLIS) ⁶

Alternative Fund Use
Authority (SRSA) ⁶

Transferability ⁶

Small Rural School Achievement

- Title I, Part A (Improving Basic Programs Operated by LEAs)
- Title II, Part A (Supporting Effective Instruction)
- Title III (Language Instruction for English Learners and Immigrant Students)
- Title IV, Part A (Student Support and Academic Enrichment)
- Title IV, Part B (21st Century Community Learning Centers)

Rural Low Income Schools

- Title I, Part A (Improving Basic Programs Operated by LEAs)
- Title II, Part A (Supporting Effective Instruction)
- Title III (Language Instruction for English Learners and Immigrant Students)
- Title IV, Part A (Student Support and Academic Enrichment)
- Parental Involvement Activities

⁶ Ibid.



Rural Education Achievement Program (REAP)

Joint Application
(RLIS) ⁶

Alternative Fund Use
Authority (SRSA) ⁶

Transferability ⁶



Can two or more eligible LEAs submit a joint application to an SEA for an RLIS subgrant?

Yes. Section 8305(e) of the ESEA permits two or more eligible LEAs, a consortium of eligible LEAs, or an Educational Service Agency (ESA) on behalf of eligible LEAs to apply for one or more programs covered by the State's consolidated State plan (including RLIS) on a consolidated basis, if each eligible LEA elects to participate in the joint application or chooses to allow the ESA to apply on its behalf (page 33).



How does the option for a joint application help two or more districts leverage their RLIS funds?

One scenario would be when two small, single school districts (K-8) feed into a larger LEA (consolidated HS) submits a joint application combining funds for greater impact. This allows for aligning activities across the districts.

⁶ Ibid.



Rural Education Achievement Program (REAP)

Joint Application
(RLIS) ⁶

Alternative Fund Use
Authority (SRSA) ⁶

Transferability ⁶

An LEA that meets the SRSA program eligibility requirements may exercise AFUA without the approval of either its SEA or the Department. However, an eligible LEA must notify its SEA each year of its intent to exercise AFUA by the notification date established by the SEA

⁶ Ibid.



Rural Education Achievement Program (REAP)

Joint Application
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Transferability ⁶

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AFUA does not authorize the transfer of funds from one program to another. Rather, it gives an LEA more options for spending its Title II, Part A and Title IV, Part A formula funds. AFUA is meant to provide additional flexibility.

⁶ Ibid.



Rural Education Achievement Program (REAP)

Joint Application
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Alternative Fund Use
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AFUA does not authorize the transfer of funds from one program to another. Rather, it gives an LEA more options for spending its Title II, Part A and Title IV, Part A formula funds. AFUA is meant to provide additionally flexibility.

Permits an eligible LEA to use all or part of the formula funds the LEA receives from an SEA under Title II, Part A (Supporting Effective Instruction); and Title IV, Part A (Student Support and Academic Enrichment) to carry out local activities authorized under one or more of the following programs - see 5211(a): Title I, Part A ; Title II, Part A; Title III; Title IV, Part A; and Title IV, Part B.

⁶ Ibid.



Rural Education Achievement Program (REAP)

Joint Application
(RLIS) ⁶

Alternative Fund Use
Authority (SRSA) ⁶

Transferability ⁶

Flexibility

Funds are not subject to all of the rules and requirements of these programs.

For example:

- These funds would not be subject to the requirement that an LEA receiving \$30,000 or more of Title IV, Part A funds use
 - not less than 20% to support well-rounded education;
 - 20% to support safe and healthy students
 - and a portion to support the effective use of technology (ESEA section 4106(e)(2)(C)-(E))

Additionally, an LEA does not have to receive funds under one of these programs in order to spend its Title II, Part A or IV, Part A funds on an allowable local activity under that program.



Rural Education Achievement Program (REAP)

Joint Application
(RLIS)

Alternative Fund Use
Authority (SRSA)

Transferability⁶



Can an LEA exercise AFUA if it chooses not to submit an SRSA application or if its SRSA award amount is \$0?

Yes, an LEA may exercise AFUA if it does not submit an SRSA application or if its award amount is \$0. Any LEA eligible for the SRSA program in a given fiscal year, regardless of whether or not the LEA applies for or receives an SRSA grant, may exercise AFUA as long as the LEA notifies its SEA of its decision.



If a dual-eligible LEA chooses to participate in RLIS instead of SRSA, may the LEA still exercise AFUA?

Yes. Any LEA eligible for the SRSA grant program, including a dual-eligible LEA opting to participate in RLIS, may exercise AFUA as long as the LEA notifies its SEA of its decision.



Does an LEA eligible for the SRSA program have to apply to the Department before exercising AFUA?

No. However, the LEA must notify its SEA of its decision to exercise AFUA in accordance with the SEA's deadline.

⁶ Ibid.



Rural Education Achievement Program (REAP)

Joint Application
(RLIS)

Alternative Fund Use
Authority (SRSA)

Transferability⁶

Transferability Guidelines

An SRSA-eligible LEA has flexibility in the use of certain Federal formula funds; **funds are not actually transferred from one program to another.** While the eligible funding may be used for local activities authorized under certain ESEA programs, it is not subject to all of the rules and requirements of those programs.

An eligible LEA may spend some or all of its formula Title II, Part A or IV, Part A funds on local activities authorized under one or more of the allowable ESEA programs (page 43).

⁶ Ibid.



Rural Education Achievement Program (REAP)

Joint Application
(RLIS)

Alternative Fund Use
Authority (SRSA)

Transferability⁶

AFUA or transferability?

SRSA eligible districts can use Title IV-A or Title II-A funds for activities that fall under other title programs. Funds are not subject to all rules. US ED guidance is vague here, with only one example provided (proportion of funds for IV-A).

Examples:

- 1 LEA does not receive IV-B funds. SRSA district may exercise AFUA and use IV-A funds for afterschool programming.
- 2 An LEA exercising AFUA that does not receive funds under Part A of Title I may nonetheless use its formula Title II, Part A or Title IV, Part A funds for Title I activities.

SRSA and RLIS districts can also exercise transferability of funds whereas the transferred funds would assume the authority of the program transferred to.

Example:

LEA desires a professional development program that exceeds their Title II-A allocation. Title IV-A funds may be transferred to Title II-A which increases the allocation, allowing the district to participate in the professional development program. (Equitable services still apply, so transfer of funds occurs after consultation with private schools.)

⁶ Ibid.



Recap

- 1 Make strategic decisions for impact, sustainability and capacity-building.
- 2 Articulate what success looks like and how the impact of the activity will be measured.
- 3 Simplified acquisition threshold = easier (faster?) procurement process.
- 4 Take advantage of the broad authority of ESSER III. Funds can be used for all the title programs (with 20% set-aside for addressing academic learning loss).
- 5 Think strategically: Current unobligated title funds + July 1 (FFY 2024) title funds + ESSER funds
- 6 Think to the future: Map out needs and priorities over the next three-five years. Plan programmatically (and financially) for 27 months, and also anticipate and plan for the next 12 - 27 months. You can always pivot in another direction if needed, but plan out over time so you don't leave money on the table and the funds are used wisely. This goes a long way to ensuring a strong return on investment = happy school board and community.



TeachUNITED

Mission

Empower educators & administrators with tools and materials needed for improving learning conditions for rural and small schools.

Who

TeachUNITED partners with local school districts and state education agencies in support of rural communities.

How

We create sustainable change through our evidence-based teaching + 1:1 coaching professional learning programs for teachers, administrators & early career educators.





TeachUNITED



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<https://teachunited.org/u-s-funding-resources/>

Webinar Resources

