High School Success

Frequently Asked Questions

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High School Success

What are the goals of the High School Success Plan?

The law creating the High School Success fund states monies from the High School Success fund should "improve students' progress toward graduation beginning with grade 9, increase the graduation rates of high schools and improve high school graduates' readiness for college or career."[1]

The law calls out specific eligibility requirements that must be fully in place by the end of the 2019-2021 *(Due to COVID, we have extended these expectations to the end of June 2022) biennium. T*he eligibility requirements are:

- · Teacher Collaboration Time around Data
- · Equitable Assignment to Advanced Courses
- · Systems Ensuring on-Time Graduation
- · Systems to Reduce Chronic Absenteeism

Additionally, it includes three programmatic areas where services should be provided:

1. Career and Technical Education,[1]
2. College-Level Opportunities, and
3. Dropout Prevention.

Districts and charter schools receiving High School Success fund monies are required to submit plans for approval by the Oregon Department of Education (ODE). Plans are required for each odd numbered year and due dates for those plans are set prior to each biennium.

The plan must include a four-year vision to improve high school on track to completion and college and career readiness.

The timeline says we need a "multi-year" plan. What period is the plan to address?

The "multi-year" plan term is used because ORS 327.883(2) (a) (C) calls for a four-year plan to be included in each biennial plan submission.

The term of the plan is reflected in the expected outcomes, not in the list of tasks or activities. That is, we ask for short-term (first year) outcomes, and long-term outcomes (beyond 4 years). These are expected to be fairly specific in the short term but grow less so the further out you look.

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Are sponsoring districts responsible for charter schools that receive independent funding for High School Success?

Sponsoring districts have no responsibility for charter schools, if they choose to operate separately. This does not circumvent or nullify any specifications addressed in the charter agreement which takes precedence over this outside support.

What are the primary methods ODE is using to communicate with educators and the public regarding High School Success?

Every grantee has an appointed ODE point of contact which connects regularly with the district or charter school's HSS point of contact. The HSS team sends updates through email, guidance documents, and are always available through phone call. Additionally, ODE maintains a High School Success webpage and a listserv supporting communication between ODE, educators and the public.

Each district and charter school also has a point of contact at ODE who reaches out on a regular basis.

Equity

The Equity Lens and how it is represented in HSS

ODE has a deep commitment to equity and anti-racism as seen in its Equity Lens. The HSS team is committed to reviewing equitable practices when reviewing and approving plans, determining eligibility markers, and in our internal review of programs and practices by districts across Oregon. The stated purpose of this legislation is to improve 9th grade on-track rates, graduation rates, and college and career readiness. This demands attention to underserved populations. Student groups historically underserved under the current system are to be identified for needed services to ensure their needs are met and they are able to fully participate in and benefit from the experience of high school.[6]

The work of improving outcomes for students cannot be limited to those students who are currently succeeding. This work is focused on dismantling the systems of White Supremacy, oppression, and injustice that prohibit the success of any student. It may require re-envisioning these systems significantly. Plans that do not include a clear intent to address the needs of students who are marginalized by current practices within the education system, and who are identified either in your local self-assessment or through data, will not be approved without revisions that contain further information for how target focal group needs will be addressed.

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What are some examples of how HSS Recipients have embedded equity or equitable strategies in their plans?

A required feature of services under High School Success is regular meetings of teachers to discuss and address ways to improve student success in their movement toward graduation. This requirement includes providing support for focal student group populations as well as groups of students particular to the district who are underperforming their peers. Data supporting teacher discussions in these meetings including data disaggregated to describe the performance of these focal student groups is required of all districts and supported under this effort.

Budget & Funding

Are districts and charter schools required to apply for High School Success funds?

Potential recipients may choose not to accept funds under this program. Should your school or district choose to decline funds, this must be communicated in writing each biennium.

Eligible recipients must complete a self-assessment and submit an updated plan each biennium.

How was the 17-19 biennium different from other biennia?

Districts and charter schools were not required to apply for the funds for 2017-18. ODE distributed these funds automatically with no application required as soon as a signed grant agreement was returned to ODE.

For the 2017-18 school year, all eligible recipients were sent grant agreements to initiate first year funding for the period 2017-19 (two years). Those choosing not to receive the funds could return the agreement unsigned. Current practice is for recipients who decline funds to do so via email on an annual basis. Districts and charter schools were required to complete a self-assessment and submit a plan starting in 18-19.

For further information, please see OAR 581-013-0020 (3) and (4)

How is funding calculated and awarded?

The Oregon Department of Education (ODE) calculates allocations for each year of the biennium using extended ADMw counts from the second period of the prior year. As a result of unique circumstances of each school district and significant variances in student life experiences and contexts, extended ADM allocations will vary.

Funds are released through the ODE E-Grant Management System (EGMS).

All claims are based on a reimbursement system consistent with existing ODE state and federal funding requirements and processes.

What are the requirements that must be addressed in order to ensure eligibility for funds?

Eligibility requirements in the law (ORS 327.883(2)) include:

1. Needs Assessment
2. Plan of Activities
3. Teacher Collaboration Time around Data
4. Equitable Assignment of Students to Advanced Courses
5. Systems Ensuring On-time Graduation
6. Practices to Reduce Chronic Absenteeism
7. Program Establishment or Expansion

The "Needs Assessment" and "Plan of Activities" will be taken care of as the application for funds, so they are not commonly listed as eligibility requirements.

A. Is every recipient required to address all three areas in every school?

No, the revision of the law by the Legislature during the 2017 regular session created a tiered system for the three areas based on funding levels:

Funding Level during the first year of the biennium	Programmatic Area
Less than $100,000	Up to all three, but at least one.
More than $100,000 but less than $350,000	Up to all three, but must address career technical education and one of the other two.
More than $350,000	Must address all three.

B. If I move tiers, do I then have to revise my plan?

Maybe. The requirements for spending in the programmatic areas are based on the tiers of funding determined by your allocation during the first year of each biennium. Review your current plan to determine if it meets the requirements outlined above. If it does, no revision is necessary. However, if it is missing a programmatic area, you will need to revise your plan to meet the new requirements. All changes must be approved by your assigned High Success Point of Contact. Please reach out to them before spending any money outside of a previously approved plan.

Can my district carry High School Success funds over from year to year?

Yes. You can carry funds over from one year to the next within each biennium. However, all High School Success funds must be spent by June 30th of the last year in the biennium. If any funds remain they will return to the High School Success fund for reallocation in the next biennium.

Funds allocated for the first year of the biennium are allocated for two years while those for the second year are allocated for a single year. No carryover request is necessary for the first year of the biennium and none is allowable for the second.

All claims for reimbursement must be submitted by August 15 of the second year of each biennium.

In 2019, the State Board of Education adopted a rule change that allows districts to request an extension to spend funds apportioned during a given biennium during the first two months of the next biennium. A request must be made to your assigned High Success Point of Contact. They will approve the request if the spending aligns to the school district's or charter schools' biennial plan.

What are the administrative allowances that grant recipients will be able to utilize for program implementation? Are there any guidelines for costs directly related to the administration of the funds over and above the cap for districts that have an approved indirect rate used for Federal grants?

For the purposes of High School Success funds, administrative costs are synonymous with indirect costs and will commonly be referred to as indirect costs.

Recipients are allowed to use up to 4% for direct administrative costs associated with analysis duties *required* for the HSS program by rule. Additionally, recipients may apply their negotiated

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indirect rate to a *portion* of the program costs; however the administrative costs **plus** the indirect rate <u>cannot exceed</u> 4% of the overall allocation. The direct administrative costs cannot be included in the base costs to calculate the indirect costs.

As an example, a recipient has an allocation of $100,000.00, and a negotiated indirect rate of 10%. Their administrative cost limit is $4,000.00. If they were to spend $2,000.00 specifically for analysis, that could be applied to direct administrative costs. They could then apply their indirect rate of 10% to a portion of program costs, but only up to $2,000.00. This way the combination of the indirect rate and the direct administrative costs do not exceed the total administration limit.

Recipients **cannot** apply their negotiated indirect rate to the entire budget as that would cause the total to exceed the allowable administrative cost limit. Another option is that the recipient can apply their negotiated indirect rate on their allowable direct costs until they've reached the maximum administrative cost (4%) allowed.

Indirect Costs Cap Table/Administrative Allowance Example Table

Subgrant Total	$100,000.00		
Direct Costs	$96,000.00		
Administrative Cap (4%)	$4,000.00		Caps total dollars from award to support administrative costs
Salaries	$50,000.00	$12,000.00	Reduced direct costs used to calculate the maximum of the Administrative Cost Cap using the Negotiated Indirect Rate
Benefits	$45,000.00	$7,000.00	
S & S	$500.00	$500.00	
Travel	$500.00	$500.00	
Administrative Costs	$4,000.00		
Data Reporting	$2,000.00		Direct administrative cost *required* by rule

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Subgrant Total	**$100,000.00**		
10%	$2,000.00		Negotiated Indirect Rate
Total Budget	**$100,000.00**		

What are the expectations for annual expenditure reporting?

Expenditure Reports are required annually. The form for submitting Expenditure Reports is released to districts and charters July 1 and are due on August 15 except if there is a summer extension. For those that do have an extension the due date is October 15th, 2021.

The Expenditure Report asks recipients to indicate how much money they spent in each of the categories listed in the tables below as well as a brief description of the work done in each category.

Please keep in mind that all spending must be aligned to your approved High School Success plan.

Programmatic Areas

	Dropout Prevention	College Level Opportunities	Career & Technical Education
Professional Learning for Staff			
Direct Student Service			
Family Engagement			
Community Partnerships			
Equipment/ Supplies/ Facilities			

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	Dropout Prevention	College Level Opportunities	Career & Technical Education
Curriculum			
Staff: salary, licensure, retention, stipend, etc.			

Eligibility Requirements

	Dollar Amount
Indirect	
Middle School Services (8th Grade)	
Teacher Collaboration	
Equitable Assignment to Advanced Courses	
Systems Ensuring on-Time Graduation	
Practices to Reduce Chronic Absenteeism	
Data Systems	

How can I avoid making common errors when filling out the expenditure report?

- Make sure your reported total expenditures equal your monies claimed for each year.
- Use whole dollar reporting.

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- Ensure your expenses match your approved plan and budget. Anything less than a 10% difference is allowable.
- If an expense is reported in a programmatic area, it should not be reported as an eligibility requirement and vice versa.
- Descriptions of expenses only need to be included if you spent money in that line item. All others can be left blank.
- If you spent money on the 8th grade/middle school services line item, it should only be reported in that line item and not in any of the programmatic areas or eligibility requirements.
- Ensure indirect fee expenses do not exceed the 4% maximum of funding allowed. The 10% difference is not applicable to this expense.

Do I need to categorize spending in both the Programmatic Areas and the Eligibility Requirements?

No. Recipients are to categorize spending in *either* the Programmatic Areas or the Eligibility Requirements. Categorizing or reporting in both will result in an over-reporting of expenditures.

What do I do if my reported expenditures do not align with the approved budget?

Plans should be referenced on a regular basis to ensure spending aligns with the approved budget and plan. If you find that expenditures are not aligned to the budget, your High Success Point of Contact will need to work with you to revise your plan ensuring your expenditures are allowable within the law.

What can we include in our budget using HSS monies?

As mentioned earlier, indirect costs are a legitimate expense under this program, recipients are allowed to retain up to 4% of the funds.

The following sections of Oregon Laws 2017, Chapter 1, provide guidance on both eligible and required services as specified in the law:

Career Technical Education

§5(2) For purposes of this section, establishment or expansion of a career and technical education program includes the purchase of equipment, the construction of facilities and, the recruitment, licensing, employment and training of personnel to provide career and technical education

College-level Opportunities

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§6(2) For purposes of this section, the college-level educational opportunities must include:

(a)(A) Advanced Placement, International Baccalaureate or comparable college-level courses; or
(B) Dual credit and other accelerated college credit programs offered in conjunction with an Oregon community college, public university or other accredited institutions of higher learning or post-high school career schools;
(b) Assisting students with the selection and successful completion of college-level educational opportunities; and
(c) The recruitment, licensing, employment and training of personnel to provide college-level educational opportunities for students in all high schools.

Dropout Prevention

§7(2) For purposes of this section, the dropout-prevention strategies must include:

(a) Implementing activities designed to reduce chronic absenteeism;
(b) Establishing and maintaining data management systems that provide timely reports on students' grades, absences and discipline by school and by course;
(c) Beginning with grade 8, using attendance, course grades, credits earned and disciplinary referrals to identify students at risk of not graduating;
(d) Beginning in the summer after grade 8, providing academic and social supports for students at risk of not graduating to ensure that the students are on track to graduate by the time the students enter grade 10 and stay on track to graduate after entering grade 10, including such supports as summer programs, additional instructional time before and after school hours, tutoring or small group instruction during the school day or counseling services; and
(e) Providing counseling and coaching to provide early exposure for students to employment opportunities and requirements and options for post-secondary education.

Services to 8th Grade Students (Middle School Services)

The law was amended by the 2017 Legislature to allow up to 15% of the total allocation to be spent on services to students during their 8th grade year. This can be used from the day after the last attendance day in 7th grade until the day after the last attendance day in 8th grade. Following the last attendance day in 8th grade, the students are considered 9th grade students and there is no restriction on the amount, which can be spent on these students.

What are some examples of allowable eligibility requirement expenditures?

Eligibility expenses relate to startup costs established and expanded after the law was enacted on December 8, 2016, not to ongoing expenditures. Each expense is either a startup eligibility

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cost or an ongoing programmatic cost. If you have questions, please connect with your HSS Point of Contact to review or change any spending around your approved plan. Continuing these programs and utilizing subsequent funding from High School Success dollars will be supported; however, continuous improvement and expansion are fundamental to the law.

Can teacher collaboration time be met through teacher prep buy-outs or providing a stipend for teachers to meet outside of their contracted hours?

Teacher collaboration time needs to happen– if this means paying teachers outside of their contract day, then time has been provided by the district. However, if that structure is prohibiting teachers from collaborating then it does not meet the intent of the law.

What guidance is there for determining if an expense is allowable through the High School Success fund?

The law creating the High School Success fund states monies from the High School Success fund should "improve students' progress toward graduation beginning with grade 9, increase the graduation rates of high schools and improve high school graduates' readiness for college or career."[1]

This gives the question, "Will your work improve student progress toward graduation (9th grade on-track), the graduation rate, and/or college and career readiness and does it equitably address appropriate student populations?"

How do alternative education and special education programs fit into High School Success funding?

High School Success funding is allocated to grant recipients, not to programs. It is true, however, that many districts will be challenged to significantly improve their graduation or 9th grade on-track rates without addressing the services offered in these programs.

The very reason alternative education programs exist is to improve the likelihood of graduation for students identified as at significant risk of failing to complete high school. Similarly, students served by special education programs generally have a greatly lowered rate of graduation than the average within a district.

While not all students in special programs such as alternative education, special education, or those for English language learners will require additional support to reach graduation, some certainly will. The effectiveness of these programs should be frequently reviewed to ensure they are both meeting the needs of individual students and supporting the goals set for them by the district. Where the district identifies these programs as in need of additional resources to

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improve graduation and 9th grade on-track rates for the district it would be appropriate to supplement program budgets with High School Success funds.

Are Oregon charter schools eligible to receive High School Success funds for students in grades 9-12?

Yes. Charter schools are eligible to receive High School Success funds. A charter school must serve students in at least one grade 9-12 and meet the eligibility requirements. A charter school could choose to submit a separate plan or join in collaboration with the sponsoring district or with other partners.

Is a school district allowed to use High School success funds for students who have graduated?

This question can have two different responses.

No. The activities, programs, and/or initiatives are to provide services to students in grades 9-12 who have not received their high school diploma.

Yes. Students who have graduated from high school, may be eligible for employment to support the work you are doing with your current high school success plan.

Can I use High School Success funds to purchase food for students, staff, and/or members of the community?

Yes. The reasonable purchase of food for students, families, staff, and other stakeholders is allowable through this state fund.

We would encourage you to connect with [Child Nutrition](#) as you develop your High School Success plans.

Could a school district utilize High School Success funding to develop mentoring, Career Technical Student Organizations (CTSOs), clubs, summer programs, internships, apprenticeships, after school programs, and other co-curricular activities?

Yes. Co-curricular student organizations are evidence-based, and many are integral to CTE instruction.

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Programmatic Areas

"Establish and Expand" language is used throughout the bill that created the High School Success fund. If a school district is at capacity with its CTE programs, college-level educational opportunities, or dropout prevention strategies, is the school district required to develop additional programs, or can it expand/retool the existing programs under High School Success?

As grant recipients identify and implement evidence-based practices for their biennial plans, the grant recipients are to establish and expand current programs beyond the 2016-17 service level. Expanding, elevating, enhancing, and/or re-tooling a program would be allowed; however, backfilling the budget with High School Success funds for programs that were established prior to the effective date of High School Success (December 8, 2016) is not allowed.

Small schools may have barriers in access, resources, and capacity and therefore, are encouraged to collaborate with other partners to assist in meeting their goals and objectives.

Does the "establish and expand" language make this just like supplement vs. supplant with our federal programs?

It is not quite the same as the federal supplement vs supplant issue. The law says:

Sec. 8. (1) A school district must use the amount apportioned under section 3, chapter 1, Oregon Laws 2017 (Ballot Measure 98 (2016)), to establish or expand programs, opportunities and strategies under sections 5, 6 and 7, chapter 1, Oregon Laws 2017 (Ballot Measure 98 (2016)), [5=CTE, 6=college level opportunities, 7=dropout prevention] *and may not use the amount apportioned to maintain programs, opportunities and strategies established prior to December 8, 2016, except when a use is necessary to replace the loss or expiration of time-limited grants or federal funds.*

This says that you can establish new programs or you can expand existing programs but you cannot take money away from established programs and replace it with High School Success funds.

That sounds similar to the concept behind the federal "supplement vs. supplant" concept but there is a subtle difference in interpretation. With many federal programs, if you have a program funded with state funds in one school and you want to expand it to another, you cannot use federal funds to do that. If you have state funds for some children, you are expected to have state funds for all children.

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Here, if you have two high schools and you have a successful program in one that you want to replicate in the other, you would be welcome to use High School Success money for the new program. This would clearly represent an expansion of the program. Similarly, if you have an established program at one of your high schools and you want to expand the offering by transporting students from the other high school so they can participate, that would be an allowable use of High School Success funds, as well.

Can we use funds to begin a program this year that doesn't get fully CTE certified until next year?

It is perfectly acceptable to use Measure 98 funds to begin the work of developing a program of study in any area. Both program development and teacher licensure are reasonable and acceptable expenses from your Measure 98 funds.

The work toward development and implementation of the program of study should proceed with all due speed, but given these programs are the product of significant effort, it is anticipated you could begin implementation as the program of study is still under development.

How do High School Success and the CTE Revitalization Grant work together?

The HSS requirement to build towards high quality Programs of Study and the Revitalization requirement that mandates links to high-wage/high-skill/in-demand career areas grounded in the local or regional economy and supported by intentional industry, community, and post-secondary support are designed to do the same thing. Traditionally, HSS recipients have braided funds with CTE Revitalization to purchase equipment, develop programs, and secure professional development designed to increase teacher effectiveness and provide a climate for greater student success.

Planning & Technical Assistance

How do I change my High School Success plan?

Before making any changes to your previously approved plan, contact your point of contact, if these changes are needed during the year. A needs assessment for these plan changes need to have been conducted and they need to align to your goals and outcomes.

Your point of contact will help you any way possible.

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Our district or charter school has a new person in charge of our High School Success plan. How do I notify the Department?

Email hssuccess@ode.state.or.us to notify us of changes. We'll connect you with your High School Success team point of contact.

Looking Ahead

What is the cycle for High School Success moving forward?

Each biennium, High School Success recipients will go through the following process:

- Needs Assessment
- Data Analysis
- Planning
- Peer Review & Plan Approval
- Implementation
- Expenditure Reporting (Annually)

- Site Visits (Frequency Determined by ODE)

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