

# Title II, Part A Budget Narrative Instructions

## Overview

The purpose of Title II, Part A is to improve teacher and leader quality and focuses on preparing, training, and recruiting high-quality teachers and principals. The Title IIA program is designed, among other things, to provide students from low-income families and minority students with greater access to effective educators. It is critical that State Educational Agencies (SEAs) and Local Education Agencies (LEAs) consider how to best use these funds, among other sources, to ensure equity of educational opportunity. In general, Title II funds can be used to provide supplemental strategies and activities that strengthen the quality and effectiveness of teachers, principals, and other school leaders.

Title IIA funds are made available on July 1 of the fiscal year and remain available for obligation for a period of 27 months. This 27-month period includes an initial 15-month period of availability and an automatic 12-month extension permitted under the “Tydings Amendment”.

**NOTE:** Due to the COVID-19 pandemic the Oregon Department of Education received a waiver from the USED to extend the period of use for 2018-19 funds through September 30, 2021. **This extension is for 2018-19 funds only and does not apply to 2019-20 or 2020-21 funds.**



Districts apply for Title IIA funds through the CIP Budget Narrative on the [ODE District Secure site](#). Ideally, the district’s application for Title IIA reflects the larger district plan for improvement. Focusing the Title IIA narrative around district priorities established as part of the overall continuous improvement process will help ensure that the district is using its Title IIA funds “more strategically and for greater impact” as the non-regulatory guidance recommends.

## Needs Assessment



**Application Purpose: Describe how the district’s prioritized needs were determined.**

All schools and districts in Oregon are called upon to engage in continuous improvement to improve outcomes for their students, including conducting a comprehensive needs assessment to inform the

# Title II, Part A Budget Narrative Instructions

development of their district and school plans. Local planning must include meaningful consultation with a broad range of stakeholders as required by ESEA sections 2101(d)(3) and 2102(b)(3), and should examine relevant data to understand the most pressing needs of educators and students, including the potential root causes of those needs given local context. Interviews, focus groups, and surveys, as well as student data, school data, and educator data, will also provide insights into local needs.

## Comprehensive Needs Assessment

A **comprehensive needs assessment process** is one that assists districts in identifying systemic inequities, strengths and opportunities and allows the district to select priorities based on needs. A comprehensive needs assessment should include multiple sources of data from at least three categories; Student Data, Perception Data, and Systems Data.

**Student data** can include both academic data (e.g.; growth and/or achievement within content areas) and non-academic data (e.g.; graduation rate, discipline data, course participation, etc.) During analysis of student outcome data, it is critical to review outcomes for each student population that is served, looking for over- or under-representation.

**Perception data** can include surveys, focus groups, advisory panels and interviews to gather information from all the stakeholders – staff, students, parents and community members. Perception data offers insight into the attitudes, beliefs and experience of all stakeholders.

**Systems data**, including personnel and policy data, provides valuable information about the health of key areas within a district. Oregon has developed the Oregon Integrated Systems (ORIS) Framework to assist districts in this examination. The five evidence-based domains in ORIS represent the systems that districts and schools need to ensure are strong in order to achieve desired outcomes for their educational communities. The ORIS Framework and associated tools and resources are found on the [Continuous Improvement](#) page of the ODE web site.

In the Needs Assessment section of the Title IIA application, districts respond to four prompts to summarize their comprehensive needs assessment process. These prompts are aligned with the questions included in the Comprehensive Needs Assessment Summary section of [Oregon’s District Continuous Improvement Plan Template](#). **Consequently, districts are encouraged to copy and paste content from their CIP template into this section of the IIA application.**

1. **Data Sources:** What data did our team examine? (Student data, Perception data, Systems data)
2. **Data Analysis:** What inequities in student outcomes were identified?
3. **Identified Priorities:** What needs did our data review elevate that have become priority improvement areas? Please **number identified priorities** for ease of reference in the Budget Narrative section of the application.
4. **Planning Process:** How were stakeholders, including parents, teachers and other relevant school personnel involved in the needs assessment and planning process?

# Title II, Part A Budget Narrative Instructions

## Priorities, Goals, and Strategies

As described earlier, the purpose of a needs assessment is to identify district strengths and opportunities that lead to the identification of priorities. **Priorities** should describe where we aim to go – but they don’t tell us how we’ll get there. Once priorities have been determined, they can be developed into measurable goals. **Goals** should be ambitious (rigorous), aspirational (may take several years) and student-focused.

Goals are supported by strategies. **Strategies** describe the work the district will undertake in pursuit of its goals. A strategy may take one or two or more years to implement. Strategies are powerful, high leverage work that build capacity and changes **practice, behavior, and belief** so students are more successful.

One way to consider writing strategies is as a theory of action (Redding & Layland, 2015)

- **If we** (evidence-based practice to be implemented)
- **then** (changes adults will make - direct short term impact)
- **and** (changes for students - the longer term impact)

For example:

***IF** we support teachers with professional learning in the role academic language plays in content learning,*

***THEN** teachers will implement appropriate, explicit oral and written language instruction and practice,*

***AND** academic achievement of English learners will improve.*

While not required in the Title IIA narrative, the theory of action model allows for the communication of the evidence-based practice being implemented, the change expected in educator practice and the ultimate impact expected on student learning. This can help in the identification of actions to implement the strategy as well as the measures needed to determine progress.

## Budget Narrative



**Application Purpose: Describe the allowable strategies the district will undertake to meet the needs identified in the Needs Assessment.**

Once the district’s prioritized needs are identified, the district completes the Budget Narrative section of the application. It is in this section that the district describes the actions it will undertake to meet the needs identified, including any professional learning to be delivered.

# Title II, Part A Budget Narrative Instructions

## Defining Professional Learning

With the reauthorization of ESEA under ESSA, the US Department of Education emphasizes the definition of professional learning as "... high quality, sustained, intensive, and classroom-focused in order to have a positive and lasting impact on classroom instruction and the teacher's performance in the classroom and not 1-day or short-term workshops or conferences." [ESEA Section 8101(42)]. All strategies included in the Budget Narrative should meet the definition of professional learning provided above.

**NOTE:** Due to the COVID-19 pandemic the Oregon Department of Education received a waiver from the USED to extend the definition of professional learning, making 1-day and short terms workshops allowable. **This extension was for 2019-20 funds only, and does not apply to 2020-21 funds.**

## Describing Activities

The Budget Narrative must include a description of the strategies to be carried out with Title II, Part A funds. Districts must document locally how these strategies will have a substantial, measurable, and positive impact on student academic achievement, and how they will be used as part of a broader effort to eliminate the achievement gap that separates low-income and minority students from other students [Section 2122((b)(2))].

All strategies included in the Budget Narrative should include:

1. The **related need** from the Needs Assessment (**WHY** did you choose this strategy?);
2. A brief **description** of the strategy/activity (**WHAT** are the knowledge and skills participants will obtain?);
3. The type and number of **staff involved** (**WHO** is participating?); and
4. The **measure(s)** used to determine whether the strategy is generating the results you expect. (**HOW** will you measure impact\*?)

### REMINDERS:

- All strategies/activities must meet the USED definition of professional learning as "...high quality, sustained, intensive" (e.g.; what is the frequency; how is the strategy part of a sustained, job-embedded plan for professional learning)
- The % of FTE should be included when requesting to fund any staff position as well as the number of staff supported by the position.
- \*Impact is not restricted to student achievement, and can include impact on educator practice. Evidence of impact could include surveys, educator evaluation data, attendance, behavior, graduation rate, course participation, etc.

# Title II, Part A Budget Narrative Instructions

Sample Items	Highlighting Key – Meets USED Definition of PD			Spending Breakdown		
<p><b>Instructional Support and New Teacher and Mentor TOSA (Relates to Need 2)</b>  <b>(WHAT)</b> Salary and payroll costs for 1.0 FTE TOSA to provide supplemental training and coaching support on explicit instructional strategies for elementary and secondary teachers who are probationary (0-3yrs). This Instructional coach will increase teacher knowledge and skills in delivering explicit literacy instruction as well as differentiating instruction within the core subject areas, using evidenced-based instructional strategies and technology. <b>TOSA will provide support throughout the year through staff meetings, training days, model teaching and individualized support.</b></p> <p><b>(WHO)</b> Approximately 114 licensed teachers representing all grades and subject areas</p> <p><b>(HOW)</b> Surveys from probationary teachers on support received, observations to calibrate coaching against district model, and retention data and exit interviews of probationary teachers who choose to leave</p>	Function	Object	Amount	2240	111	\$73,975
				2240	2XX	\$48,289
						\$122,264
<p><b>1st Grade Reading Data Review, Action Planning, and Review (Relates to Need 1)</b>  <b>(WHAT)</b> The five year trend in the district’s DIBELS data indicates that 1st grade is the first point at which students do not make and maintain reading proficiency at 80%. We have done a curriculum review and revised our pacing and scope and sequence to better serve our 1st grade students to master critical skills. As we implement this newly revised process, <b>we will give all 1st grade teacher teams a half-day release after each unit of instruction (6 ½ days total)</b> to examine Unit Assessment data, regroup students, and plan for re-teaching/extension for all.</p> <p><b>(WHO)</b> 6 half-day subs for 40 1st grade teachers (\$115/hour)</p> <p><b>(HOW)</b> Biannual principal walkthroughs , reporting of outcomes of half-day release, 1<sup>st</sup> grade DIBELS data collected three times per year</p>	Function	Object	Amount	2240	12X	\$27,600
						\$27,600

To facilitate review, **please create a separate line item for each strategy.** To do this, click on the “Add Narrative Line” button that appears just below the Program Activities header on the Budget Narrative page. Though the district may be undertaking multiple strategies related to each need, each strategy should be its own line item. Strategies should not be grouped by need or function code.

## Supplement Not Supplant

There is a federal provision of supplement, not supplant in Title II, Part A: *Funds received under this subpart shall be used to supplement, and not supplant, non-Federal funds that would otherwise be used for activities authorized under this subpart(s)* [Title I, Part A (section 1120A (b); Title II, Part A (section 2113(f), 2123(b); and Title VI, Part B (section 6232)) of the ESEA].

This means that funds for this program must be used to supplement (enhance services) and not supplant (replace) funds from non-federal sources. Any program activity required by State law, Oregon Administrative rules, or local board policy may not be paid with Title IIA funds. State funds may not be

## Title II, Part A Budget Narrative Instructions

decreased or diverted for other uses merely because of the availability of federal funds. Districts must maintain documentation that clearly demonstrates the supplementary nature of these funds.

To determine whether a fiscal expenditure supplements and does not supplant, school districts must run the following tests:

- **Test I:** Are the services that the district wants to fund with ESEA funds required under state, local, or another federal law? If they are, then it is supplanting.
- **Test II:** Were state or local funds used in the past to pay for these services? If they were, it is supplanting.
- **Test III:** Are the same services being provided in other schools paid for with state or local funds? If they are, then it is supplanting.

### Substitutes

Under Title II, Part A, an LEA may use funds for a substitute teacher while a teacher is receiving professional development provided that the professional development meets the ESEA definition in section 8101(42) and the LEA can justify that paying for a substitute and the professional development itself (a) is consistent with the purpose of Title II, Part A – (i.e., to increase student achievement, to improve the quality and effectiveness of educators, to increase the number of educators who are effective in improving student academic achievement, and to provide low-income and minority students greater access to effective educators), and (b) addresses the learning needs of all students. See sections 2001 and 2103(b)(1) and (2) of the ESEA.

LEAs also must ensure that the hiring of these substitutes supplements, and does not supplant the use of local and State funds they would otherwise be spending for such substitutes.

### Conferences and Workshops

Many districts find benefit in sending staff to conferences and workshops both in and out of state. These gatherings can be extremely valuable, providing participants the opportunity to access nationally acclaimed experts as well as connect with job/content alike colleagues. In keeping with the USED definition of professional development referenced earlier in this document, **conferences and workshops are approvable when they are included as part of larger strategy, not as an end in themselves.**

Districts considering including conference attendance as an activity should articulate:

- **How the conference is part of a sustained, job-embedded plan for professional learning** - What additional activities/training/collaboration is taking place that build on the learning gained from conference attendance?
- **The plan for delivering the content to other staff so that the learning extends beyond those who attended** – What method will the district use to spread the learning received at conferences (e.g.; PLCs, staff meetings, an “un-conference”, EdCamp, etc.)

# Title II, Part A Budget Narrative Instructions

## Class Size Reduction Strategies

Keeping in mind that the intent and purpose of Title II, Part A is to strengthen the quality and effectiveness of teachers, principals, and other school leaders the strategy of class-size reduction, while allowable, has limited impact reaching only a very small percentage of teachers and an even smaller percentage of students. Oregon has determined that class-size reduction strategies are allowable only when:

- implemented in Grades K-3;
- class size is reduced to 20 or fewer students **in each class at that grade level in the school**; and
- the teacher hired to reduce class size holds appropriate state licensure.

Those LEAs requesting to use Title IIA funds for class size reduction must provide a rationale for the request, along with the measures to be used to determine the impact of this strategy on teacher effectiveness and student performance.

## Licensure

Title II, Part A funds may be used to support both traditional and non-traditional pathways through the development of new teacher, principal, or other school leader preparation academies, teacher and principal residencies and other alternative routes. Additionally, Title II, Part A funds may be used to support the effective recruitment, selection, and hiring of the most promising educators. (ESEA section 2103(b)(3)(C)).” LEAs may also use Title IIA funds to support staff in obtaining endorsements that address an identified need in the district (e.g., ESOL, Special Education).

All districts are required to ensure that teachers meet state licensing requirements as defined by the Teacher Standards and Practices Commission (TSPC). Districts are encouraged to access the [“Course to Endorsements Catalogue”](#), a resource developed jointly by the Oregon Department of Education and TSPC, for guidance in determining the licensure requirements for specific courses. As the result of the elimination of the Highly Qualified requirement districts are no longer required to submit plans for teachers who are not highly qualified.

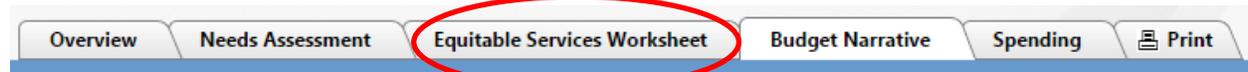
## Supplies and Materials

Title II, Part A funds may be used to purchase materials and supplies used in professional development activities, including the materials that a teacher will need in order to apply the professional development in a classroom setting. However, Title II, Part A does not permit the use of program funds to purchase materials and supplies that, although they may benefit students, are not directly connected to the teachers’ professional development or for student use.

## Food

Districts will have to make a compelling case that the unique circumstances they have identified would justify these costs as reasonable and necessary. It is suggested that agendas be structured so that there is time for participants to purchase their own food, beverages, and snacks. For more detail see the [USDE Guidance on Use of Federal Funds for Conferences and Meetings](#).

## Equitable Services (Private Schools)



**Purpose:** To ensure that participating private schools receive an equitable share of Title IIA funds.

If the district has indicated that there are private schools participating in Title IIA, an Equitable Services Worksheet tab will appear on the application. The tab will not appear for districts that have no participating private schools.

### Consultation

The goal of consultation is agreement between the LEA and appropriate private school officials on how to provide equitable and effective programs for eligible private school children. If private school officials want their teachers to participate, the district must involve the participating private school officials during all phases of the development and design of the program through ongoing communication between appropriate parties (consultation).

Districts must **annually** contact private school officials in the district’s attendance area to determine if they want their teachers to receive services. Such initial contact may be carried out through a variety of communication forms, including documented phone calls, certified letters, fax, email, or meetings with the private school officials. [Section 9501] Ideally consultations should take place in late winter (February) or early spring (March).

Districts are required to provide evidence that consultation has taken place. This is accomplished by completing the *Verification of Annual Private School Consultation* form through [TransAct](#).

### Ombudsman

States are required to appoint a Private School Ombudsman for the purpose of ensuring the private school regulations are implemented. Specifically, the duty of the Ombudsman is to:

- Monitor and enforce equitable services under Titles I and VIII
- Serve as a general resource for both private schools and public school districts (LEA)
- Provide technical assistance to private schools and public school districts
- Collect and archive documentation from public school districts regarding consultation meetings
- Ensure a timely and meaningful consultation has occurred and equitable services are provided to private school students, staff and families
- Participate in Oregon’s Title I Committee of Practitioners
- Participate in consultation meetings between private schools and public school districts as requested by either party

# Title II, Part A Budget Narrative Instructions

- Mediate disagreements between private schools and public school districts

The Ombudsman is a resource for both public and private schools in providing technical assistance and guidance. The Ombudsman will also receive required documentation about the consultation process from school districts.

The Oregon Private School Ombudsman is **Joni Gilles**. If you have questions about consultation or any of the other roles described above you may reach her at [joni.gilles@state.or.us](mailto:joni.gilles@state.or.us) or by phone at (503) 947-5638.

## Roles and Responsibilities

The activities undertaken by the private school should be matched to the needs of their students, teachers and principals. **Federal regulations in 34CFR 299.7(c) require a district to examine particular needs of private school teachers and not simply make available to private school teachers the kinds of services it makes available to public school teachers.**

The primary role of the district is to serve as the guide and resource for participating private schools regarding Title IIA. This means that the district should review and work with participating schools to adjust any activities to ensure they meet IIA requirements. A participating private school's primary responsibility is to be in communication with the district regarding the school's needs and plan for use of its equitable share.

## Determining the Equitable Share - Equitable Services Worksheet

The amount an LEA must reserve to provide equitable services for private school teachers and other educational personnel for Title II, Part A services is based on the LEA's **total** Title II, Part A allocation, less administrative costs. Administrative costs are those costs that are incurred in operating the grant which can include conducting meetings, negotiating contracts, processing purchase orders, accounting activities, file maintenance, conference registration, etc. **The amount deducted for administrative costs prior to calculating equitable service amounts cannot exceed the district's negotiated indirect rate.** Any additional costs to manage the grant that exceed the indirect rate can be included as a line item in the district's IIA application.

The Equitable Services Worksheet appears as a tab in the district's application once the district has entered the names of the participating private schools through the secure district website. The yellow boxes in the worksheet indicate fields that must be completed by the district. The remaining boxes will be auto-calculated.

**Student Enrollment:** For *District Enrollment* enter the total student enrollment in the district; for *Participating Private School Enrollment* enter the total enrollment of the participating private school(s). The worksheet will automatically add these two numbers to calculate the *Total Enrollment*. **NOTE:** All students enrolled in the private school are included in the calculation, regardless of whether they live within the district boundaries.

**Title II, Part A Allocation:** For *District Title II, Part A Entitlement* enter the district allocation for Title IIA for the current year. For *Allocations for Administration*, include the costs that are incurred in operating

## Title II, Part A Budget Narrative Instructions

the grant which can include conducting meetings, negotiating contracts, processing purchase orders, accounting activities, file maintenance, conference registration, etc. **This amount cannot exceed the district's negotiated indirect rate.** The worksheet will subtract these costs from the district entitlement to calculate the *District's Remaining Allocation*.

Once the remaining district allocation has been determined, the spreadsheet will calculate the *Per Pupil Allocation* and the resulting *Equitable Services Amount*. This represents the funds that must be made available to the participating private school(s).

If you have questions about the equitable services worksheet please contact [Sarah Martin](#).

### Spending

Private schools can use Title IIA funds to engage in all of the same activities that districts do, with several exceptions. Title IIA funds cannot be used to pay for:

- the salary or benefits of private school teachers,
- the cost for substitutes replacing private school teachers who attend professional development,
- the cost associated with attending religious professional development.

Additionally, **IIA funds are never provided directly to the private school.** Rather the district serves as the fiscal agent for the private school, reimbursing providers for their services.

***IMPORTANT NOTE:*** *Funds allocated for eligible non-public students must be obligated in the fiscal year for which the funds are received (July 1 – September 30 of the following year). Any funds not encumbered by the private school by September 30 will be added to the district's carryover funds.*

**NOTE:** Due to the COVID-19 pandemic the Oregon Department of Education received a waiver from the USED that allows private schools to carryover the equitable share. **This extension is for 2019-20 funds only, and does not apply to 2020-21 funds.**

### Application Requirements – REVISED!

Districts are responsible for ensuring that all participating private schools have an approved plan that meets the requirements of Title IIA, but no longer need to communicate the content of those plans to ODE through the Budget Narrative. School plans, evaluation of impact of the strategies within the private schools and expenditure reports for equitable services will be shared with ODE as part of the monitoring process.

For the purposes of the Budget Narrative, the district need only create ONE line item in the narrative including:

1. The names of participating schools;
2. The date of initial consultation; and
3. The total equitable services amount from the worksheet.

# Title II, Part A Budget Narrative Instructions

## Spending Page



**Purpose:** Show how Title II, Part A funds will be allocated.

Any strategies funded with Title II, Part A funds must be allowable under the law as well be reasonable and necessary to carry out the purposes of the program. Amounts on the spending page are automatically populated through the strategies entered in the narrative.

## Resources

- [ODE Title IIA web page](#)
- [USED Non-Regulatory Guidance for Title II, Part A](#)
- [Oregon Federal Funds Guide](#)
- [Course to Endorsements Catalogue](#)
- [Carryover Guidance](#)
- [IIA Cliff Notes](#)
- [Title IIA Listserv](#)

If you have additional questions, please contact Sarah Martin, Education Specialist, at [sarah.martin@state.or.us](mailto:sarah.martin@state.or.us) or by phone at 503-947-5668.