

Writing Approvable CFP Investments

In the Consolidated Federal Programs (CFP) grant application, requests for funding are referred to as “investments.” The terminology is deliberate. An investment reflects a long-term commitment of resources in order to meet defined goals for improving student outcomes and staff capacity. Purposes, activities, strategies and interventions described in CFP investments should be supported by data and framed around the following questions:

- What do we want to accomplish?
- How do we know this is a need?
- What change(s) can we make that will be an improvement?
- How will we know when a change resulted in an improvement?

Writing an Investment

Begin with the specific **purpose** of the proposed investment. The purpose should be clearly connected to a data-supported need. Purpose statements should be detailed but clear. The more detailed the statement of purpose, the more information the CFP team will have to determine if the investment is allowable, reasonable and necessary.

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

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

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

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

Make sure that investments clearly speak to a need and avoid over-generalized purpose statements such as: “In order to provide a well-rounded education…” Purpose statements should be used to identify a need rather than a funding source.

Next, describe the specific **activities, strategies or interventions** for which funds are being requested. As with the purpose, the more clear the description is the more easily it can be determined if the investment is allowable, reasonable and necessary. Provide specifics such as the number of teachers or other staff members who will be participating, the number of day and/or hours of consulting or training, or the number of students served. Avoid naming specific vendors, venues, dates, contractors, qualifications or names of hires to prevent disallowed costs. Keep in mind that placeholders for activities, strategies or interventions that have not yet been planned or determined are not allowable.

Example #1 (cont.): "...a full-time K-6 instructional coach to provide classroom-embedded professional learning on evidence-based practices through research, modeling, PDSA cycles peer observation and Networked Improvement Community."

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

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

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

In the past, CFP team leaders have been asked to identify "**cost categories**" as a final step in writing an investment, such as "costs include stipends, benefits, mileage and instructional materials." Be sure not to describe any costs that are not clearly included in your budget details, as this may complicate the review of an investment, leading to a denial. Rather, short explanations of an investment's costs will appear in the budget details section of the CFP application.

Do	Do not
Write investments that are substantiated by your data.. It must be clear to the reader that investments are being requested to meet the needs supported by data.	Include "cost categories" in the investment description. Rather, include this information on the budget details page.
Write investments that include a clear statement of purpose and descriptions of specific activities, strategies and interventions.	Include dollar amounts in the investment description. Rather, include this information on the budget details page. It is, however, helpful to include language, for investments that involve consultant services that are within the fair market value, that the consultant fees will not exceed \$2,000/day, as this helps the CFP Team easily identify if a Scope of Work is needed.
For professional development investments, include approximate number of staff and BCO and/or substitute teachers as needed.	Include an FTE for stipends/hours beyond contract or for outside, third-party service providers.
Include an FTE for salaried positions; please be sure to prorate FTEs if adding investments mid-year.	Include names of specific vendors, venues, dates, contractors or hires, as this may run contrary to procurement requirements or may lead to disallowed costs if provider or strategy changes.
Gain pre-approval from the state Secretary of Education for any investments that include travel outside of the continental U.S.	Include citations for evidence base in the investment description.
Make sure that all supporting documents, such as service delivery plans, job descriptions and schedules for coaches, are uploaded to GMS, as well as a Scope of Work	

<p>for outside consultants and contractors that exceed market price.* Name uploaded files to clearly identify the investment they are supporting (i.e. Investment 25 – Scope of Work.docx)</p> <p>Include benefits in the same investment as associated salaries or stipends. Please do not write separate investments for benefits.</p>	<p>Reference uploaded documents in lieu of a description. You may upload supporting documents if you choose, but not in place of a detailed, specific investment description.</p> <p>Use the terms “coach” or “coaching” unless an FTE is involved. Use “consult”, “consultant” or “consultancy.”</p>
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*Part of the consideration for funding is “reasonable cost.” This includes “Market prices for comparable goods or services in the geographic area” (EDGAR). The market price for external consultants in Vermont shows a range of \$350.00 to \$2000.00 per day. These prices reflect inclusion of all related expenses, such as materials and travel. Funds spent on external trainers, consultants, or contractors that exceed the fair market value must include a Scope of Work to be included as a supporting document in your application for funding; there is a template available to assist with writing a Scope of Work, though any format including all of the requested information is acceptable. The Scope must include:

- Why the activity is necessary
- The timeline for the specific activities/deliverables
- The costs associated with the project activities
- Rationale for exceeding fair market price
- The process by which the service outcomes will be measured

When writing an investment for professional development, the following information must be included or the investment cannot be accepted:

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

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

Subgranting

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

Creating Budget Details

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

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

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

Budget Details:

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

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

Budget Details:

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

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