# Federal Education Funding Planning Guidance

## Purpose

LEAs are facing tremendous fiscal pressures caused by the imperative to respond to needs generated by the evolving COVID-19 pandemic, while state and local revenues simultaneously are declining. Resources from the CARES Act Elementary and Secondary School Educational Relief (ESSER) Fund, when they become available, will help you to meet these needs. However, they should used when you identify needs that cannot be met, or that cannot fully be met, with "regular" federal, state, and local funding sources.

This document is intended to offer guidance to Vermont LEAs as you prepare your CFP, IDEA, Perkins, and AEL grant applications. It is meant to be a "living document" and will be updated with information on additional needs and sources of funding as such information becomes available.

## How to Use this Document

The Agency highly recommends that Superintendents and Business Managers play a stronger role in coordinating needs assessment and grant application processes than they perhaps have done in the past. Superintendents and Business Managers have a global view of the total work of the districts and are well positioned to work with programmatic staff (i.e., Curriculum Coordinators, Special Education Administrators, etc.) to braid* "regular" federal funding sources with one another to maximize funding and accomplish the important work facing our school districts over the next year.  In addition, Superintendents and Business Managers are able to provide strategic district-wide planning and maintain strong oversight of all available funding sources to avoid the loss of any federal funding due to expiration of one or more available funding streams.

As you complete your applications for CFP, IDEA, Perkins and AEL funds, the Agency encourages you to consider the following overarching principles that will enable you to promote a Strong, Healthy Start to the school year in this time of uncertainty:

- Assure there is equity in access to education for all learners
- Use evidence, data, research and best practice to inform your decision making
- Invest strategically for effectiveness and efficiency

The following tables in this document are intended to give you "at a glance" information that will assist you with the third bullet - strategic planning of investments. Needs identified in the Communications, Structures for Student Success, Instruction and Feedback, Ensuring Accessibility,

## Contact Information:

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and Other tables are ones that have been expressed to Agency staff. These lists are not exhaustive, and they may not reflect your LEA's particular needs.

Each funding source comes with its own requirements and restrictions. Please use the [Grant Details Grid for LEA Fiscal Planning](#) spreadsheet as a quick reference as you make fiscal planning decisions. You may or may not be able to use one or more of the other funding sources to meet *your* specific needs, depending on factors such as whether that need is documented in a needs assessment, if one is required by that funding source, whether limitations such as Supplement not Supplant apply to that funding source, and the particular features of your intended investment/strategy/goal. You should consult US Department of Education and Vermont Agency of Education guidance documents for further information on allowable uses of each funding source. Furthermore, Agency staff are available by phone and email to help you clarify whether a particular investment/strategy/goal is allowable under a particular funding source.

In summary, we recommend that:

- LEAs fully budget their allocation,
- LEAs who received an approved indirect cost rate should consider utilizing it to its fullest extent;
- LEAs reserve their CARES ESSER funding, when it becomes available, for immediate and near-term COVID-19-related needs that cannot be funded under "regular" federal and other funding sources (ex. packaging for school meals, school meals delivery)
- LEAs should "braid" funding sources when possible to achieve optimal impact.

*Braiding funds is different than blending funds. LEAs braid funding sources in order to accomplish common goals; however, the restrictions and allowable uses of each of the funding sources braided together maintains its original restrictions and allowable uses. LEAs are required to maintain a separate accounting record for each funding source.*

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## Anticipated Needs: Communications

| LEA Unmet or Anticipated Need | Title Funds (I-X) and McKinney-Vento | IDEA | AEL | Perkins | CARES |
|---|---|---|---|---|---|
| Technology infrastructure (hardware, software, connectivity, assistive technology) | May be allowed under Title IA, Title IVA (effective use of technology - subject to % limitations) and/or Title V. | May be allowed if connected to a student's IEP/504 Plan in order to improve communication with family, to provide the student with access to GenEd curriculum, or if an assistive technology or piece of adaptive equipment that would enhance related services (OT, PT, BI, etc.). | May be allowed to enable student access to internet, hardware and software. | May be allowed if purpose is to improve CTE programs under Required Use 5 - expanding opportunities for students to participate in distance CTE and blended-learning programs. | Allowable expense (category 1) |
| Professional development for staff on effective strategies for remote communications with families. | May be allowed under Title IA, Title IIA, Title IVA and Title V. | May be allowed; parental training also may be allowable. | May be allowed. | May be allowed under Required use 2(f) to provide teachers, faculty...with opportunities to advance knowledge, skills, and understanding in pedagogical practices. | Allowable expense (categories 5, 7, 10, 12, 13, 15, or 17) |

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## Anticipated Needs: Structures for Student Success

| LEA Unmet or Anticipated Need | Title Funds (I-X) and McK-V | IDEA | AEL | Perkins | CARES |
|---|---|---|---|---|---|
| Planning time and assistance to address teaming and scheduling innovation | May be allowed under Title IA, IIA, III, IVA and V. | May be allowed. | May be allowed. | May be allowed if purpose is to improve CTE programs under Required Use 5 - expanding opportunities for students to participate in distance CTE and blended-learning programs. | |
| Sanitation supplies/contracts | May be allowed under Title IVA (safe & healthy students) and Title V. | Broadly speaking, not allowable. May be allowed if it can be closely aligned to the individualized learning/instructional needs of a student. | May be allowed. | Not allowed. | Allowable expense (category 2) |
| Personal protective gear for staff or students (e.g., masks, gloves) | May be allowed under Title IVA (safe & healthy students) and Title V. | May be allowed if personnel need medical equipment to support a specific student with a disability. | May be allowed. | Not allowed. | Allowable expense (category 2) |

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| LEA Unmet or Anticipated Need | Title Funds (I-X) and McK-V | IDEA | AEL | Perkins | CARES |
|---|---|---|---|---|---|
| New or expanded mental health services/supports | May be allowed under Title IA, IVA (safe & healthy students) and Title V. | May be allowed if the service/support can be linked to a student's IEP/504 Plan. | Not allowed. | May be allowed to provide programming aimed at supporting and encouraging achievement of "special populations (see law for definition)"; Required use 2e - supporting the implementation of strategies to improve student achievement and close gaps in student participation and performance in CTE programs; cannot pay for individual students. | Allowable expense (category 3) |
| District or school level technology infrastructure (hardware, software, connectivity, assistive technology, platforms for Personal Learning Plans, Learning Management Systems) | May be allowed under Title IA, Title IVA (effective use of technology - subject to % limitations) and Title V. | May be allowed if the service/support can be linked to a student's IEP/504 Plan. | May be allowed. | May be allowed if used to support special populations in the technical center; may be used to purchase resources for career exploration and career development throughout the region. | Allowable expense (category 1) |

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| LEA Unmet or Anticipated Need | Title Funds (I-X) and McK-V | IDEA | AEL | Perkins | CARES |
|---|---|---|---|---|---|
| Student level technology infrastructure (hardware, software, connectivity, including assistive technology, platforms for Personal Learning Plans, Learning Management Systems) | May be allowed under Title IA, Title IVA (effective use of technology - subject to 15% infrastructure limitations) and Title V. | May be allowed if assistive technology is required per a student's IEP/504 plan. | May be allowed if used to purchase equipment that provides a student access to their instruction. | May be allowed if used for instructional technology and work place technology purchases. | Allowable expense (category 1) |
| Busing costs to deliver meals/educational materials | | May be allowed if service can be linked to a student's IEP/504 plan. | Not allowed. | Not allowed. | Allowable expense (category 5) |
| Supplemental nutrition services (ex. "backpack" programs) | May be allowed under Title IVA (safe & healthy students) and Title V. | Not allowed | Not allowed. | Not allowed. | Allowable expense (category 7) |
| Summer or extended learning programming for students with or without disabilities | May be allowed under Title IA, Title IVA, Title IVB (21C) and Title V. | May be allowed if programming can be linked to a student's IEP/504 Plan. | N/A AEL is already year-round programming. | Generally, may be allowed so long as it is zero cost to family. | Allowable expense (category 4 or 7) |

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| LEA Unmet or Anticipated Need | Title Funds (I-X) and McK-V | IDEA | AEL | Perkins | CARES |
|---|---|---|---|---|---|
| Translation of instructional materials/purchase of multilingual materials | May be allowed under Title IA, Title III and Title V. | May be allowed if the service/support can be linked to a student's IEP/504 Plan. | May be allowed. | May be allowed under Required use 5(P): making all forms of instructional content widely available. | Allowable expense (category 7) |

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## Anticipated Needs: Instruction and Feedback

| LEA Unmet or Anticipated Need | Title Funds (I-X) and McK-V | IDEA | AEL | Perkins | CARES |
|---|---|---|---|---|---|
| Purchase of digital instructional materials | May be allowed under Title IA, Title IVA (well-rounded educational opportunities or effective use of technology) and Title V. | May be allowed if materials are part of a student's IEP/504 Plan. | May be allowed. | May be allowed under Required use 5(I), 5(P) - must be for use in the region served by the technical center. | Allowable expense (category 1) |
| Subscriptions or licenses or other fees associated with online learning platforms or resources | May be allowed under Title IA, Title IVA (well-rounded educational opportunities, effective use of technology) and Title V. | May be allowed if it can be linked to a student's IEP/504 Plan. | Not allowed. | May be allowed under Required use 5(I), 5(P) - must be for use in the region served by the technical center. | Allowable expense (category 1) |
| Professional Development for staff on best practices in digital curriculum design and implementation, use of technological tools | May be allowed under Title IA, Title IIA, Title IVA and Title V. | May be allowed. | May be allowed. | May be allowed under Required use 2(f) provide teachers, faculty… with opportunities to advance knowledge, skills and understanding in pedagogical practices. | Allowable expense (categories 10, 12, 13, 15, or 17) |

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## Anticipated Needs: Ensuring Accessibility

| LEA Unmet or Anticipated Need | Title Funds (I-X) and McK-V | IDEA | AEL | Perkins | CARES |
|---|---|---|---|---|---|
| Training for families/parents to support students in remote learning environments | May be allowed under Title IA, III, IVA, and V. | May be allowed as Parent Counseling and Training as a Related Service is a requirement of IDEA. | May be allowed as a family literacy-related activity/support. | May be allowed if connected to Required Use 5 - expanding opportunities for students to participate in distance CTE and blended-learning programs; also, may be allowed if used to support special populations in the technical center. | |
| Compensatory services for students with disabilities | Not allowed. | May be allowed if compensatory services are per a student's IEP/504 Plan. | N/A | Not allowed. | Allowable expense (category 7) |
| Outreach, service delivery for students experiencing homelessness | May be allowed under McKinney-Vento, Title IA and Title V. | May be allowed if it can be linked to a student's IEP/504 Plan. | May be allowed if outreach is designed to include all populations who do not have a diploma/equivalency and are at least 16. | May be allowed if it is a part of a broader program supporting special populations (students experiencing homelessness is one of 9). | Allowable expense (category 7) |

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| LEA Unmet or Anticipated Need | Title Funds (I-X) and McK-V | IDEA | AEL | Perkins | CARES |
|---|---|---|---|---|---|
| Outreach, service delivery for migrant students | May be allowed under Title IA | May be allowed if it can be linked to a student's IEP/504 Plan. | May be allowed. All outreach must be designed to include populations who meet eligibility criteria, which includes: student must be at least 16, have no high school diploma or is basic skills deficient; or an English Language Learner. | May be allowed if it is part of a broader program supporting special populations (migrants are not a specific population in Perkins, but if students were also English language learners this might be allowed) | Allowable expense (category 7) |
| Professional Development for staff on effective remote learning communication strategies for families of students with disabilities | May be allowed under Title IA, Title IIA, Title IVA and Title V. | May be allowed. | May be allowed. | May be allowed under Required use 2(f) provide teachers, faculty… with opportunities to advance knowledge, skills and understanding in pedagogical practices. | Allowable expense (category 10, 12, 13, 15, or 17) |

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| LEA Unmet or Anticipated Need | Title Funds (I-X) and McK-V | IDEA | AEL | Perkins | CARES |
|---|---|---|---|---|---|
| Technology infrastructure (hardware, software, connectivity, including assistive technology) | May be allowed under Title IA, Title IVA (effective use of technology -subject to % limitations) and Title V. | May be allowed if assistive technology is part of a student's IEP/504 Plan. | May be allowed. | May be allowed if purpose is to improve CTE programs; Required Use 5 - expanding opportunities for students to participate in distance CTE and blended-learning programs. | Allowable expense (category 1) |
| Translation of instructional materials | May be allowed under Title IA, Title III and Title V. | May be allowed if it can be linked to student's IEP/504 Plan. | May be allowed. | May be allowed under Required use 5(P): making all forms of instructional content widely available. | Allowable expense (category 7) |

## Anticipated Needs: Other

| LEA Unmet or Anticipated Need | Title Funds (I-X) and McK-V | IDEA | AEL | Perkins | CARES |
|---|---|---|---|---|---|
| Hazard pay for bus drivers, school food personnel | Not allowed | Not allowed | Not allowed | Not allowed | Allowable expense (category 5) |
| Replacement of local funds for any allowable activity, including salaries for staff paid with local funds | Not allowed | Not allowed | Not allowed | Not allowed | Allowable expense (category 5) |
| Salaries for food service personnel | Not allowed | Not allowed | Not allowed | Not allowed | Allowable expense (category 5) |
| Expenses related to child care for essential persons | Not allowed | Not allowed | Not allowed | Not allowed | Allowable expense (category 5 or 11) |
| Packaging for unitized meal deliveries | Not allowed | Not allowed | Not allowed | Not allowed | Allowable expense (category 5) |

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## Questions to Consider When Determining the Most Appropriate Funding Source

- Under which Federal grants would this item be allowable?
- Which is the most restrictive of these funds?
- Which of these funds will expire first?
- Will using Federal funds this year cause an appearance of supplanting?
- Are there any caps on the administrative funds I am using?
- Have I claimed my indirect cost rate?
- If not, am I leaving funds on the table?
- Can using transferability or adding other funding sources to the schoolwide pool increase flexibility or in my ability to use funds before they expire?
- If LEA participates in Schoolwide, what methodology of drawing the funds will be most beneficial for LEA this year when considering expiration of funds?

Each funding source comes with its own requirements and restrictions. Please use the Grant Details Grid for LEA Fiscal Planning spreadsheet as a quick reference as you make fiscal planning decisions. You may or may not be able to use one or more of the other funding sources to meet *your* specific needs, depending on factors such as whether that need is documented in a needs assessment, if one is required by that funding source, whether limitations such as Supplement not Supplant apply to that funding source, and the particular features of your intended investment/strategy/goal. You should consult US Department of Education and Vermont Agency of Education guidance documents for further information on allowable uses of each funding source. Furthermore, Agency staff are available by phone and email to help you clarify whether a particular investment/strategy/goal is allowable under a particular funding source.

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