

## 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 be 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 their 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, and
- 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 allocations,
- 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), and
- 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 maintain their original restrictions and allowable uses. LEAs are required to maintain a separate accounting record for each funding source.*

## Anticipated Needs: Communications

LEA Unmet or Anticipated Need	Title Funds (I-V) and McKinney-Vento	IDEA	AEL	Perkins	CARES
Technology infrastructure (hardware, software, connectivity, assistive technology)	May be allowed under Title IA, Title III*, 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 III*, 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 7, 10, 12, 14, 15, or 17).

### Anticipated Needs: Structures for Student Success

LEA Unmet or Anticipated Need	Title Funds (I-V) and McK-V	IDEA	AEL	Perkins	CARES
Planning time and assistance to address teaming and scheduling innovation	May be allowed under Title IA, Title III*, Title IVA and Title 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.	Allowable expense (category 6).
Sanitation supplies/contracts	May be allowed under Title IVA (safe & healthy students)**, Title IVB (when used in 21st Century Community Learning Centers funded programming that occurs during non-school hours), 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).

LEA Unmet or Anticipated Need	Title Funds (I-V) and McK-V	IDEA	AEL	Perkins	CARES
Personal protective gear for staff or students (e.g., masks, gloves)	May be allowed under Title IVA (safe & healthy students)**, Title IVB (for staff of 21 <sup>st</sup> Century Community Learning Centers funded programs during non-school hours), 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).
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).

LEA Unmet or Anticipated Need	Title Funds (I-V) and McK-V	IDEA	AEL	Perkins	CARES
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 III*, 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).
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 III*, 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 educational materials	Not allowed.	May be allowed if service can be linked to a student's IEP/504 plan.	Not allowed.	Not allowed.	Allowable expense (category 5).

<b>LEA Unmet or Anticipated Need</b>	<b>Title Funds (I-V) and McK-V</b>	<b>IDEA</b>	<b>AEL</b>	<b>Perkins</b>	<b>CARES</b>
Supplemental nutrition services (ex. "backpack" programs)	Not allowed.	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 III (if intended for ELs or in order to enable EL students' participation), 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).
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).

## Anticipated Needs: Instruction and Feedback

LEA Unmet or Anticipated Need	Title Funds (I-V) and McK-V	IDEA	AEL	Perkins	CARES
Purchase of digital instructional materials	May be allowed under Title IA, Title III*, 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 III*, 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 III*, 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, 14, 15, or 17).



## Anticipated Needs: Ensuring Accessibility

LEA Unmet or Anticipated Need	Title Funds (I-V) and McK-V	IDEA	AEL	Perkins	CARES
Training for families/parents to support students in remote learning environments	May be allowed under Title IA, Title III*, Title IVA, Title IVB, and Title 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.	Allowable expense (category 7).
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).

LEA Unmet or Anticipated Need	Title Funds (I-V) 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 III*, 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 7, 10, 12, 13, 14, 15, or 17).

LEA Unmet or Anticipated Need	Title Funds (I-V) and McK-V	IDEA	AEL	Perkins	CARES
Technology infrastructure (hardware, software, connectivity, including assistive technology)	May be allowed under Title IA, Title III*, 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/purchase of multilingual 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).

\*For purposes of implementing educational services and supports for the general student population, LEAs should rely primarily on other federal, state or local funds to purchase technology infrastructure, provide related professional development for distance learning, and purchase digital instructional materials and online subscriptions/licenses to learning platforms and resources. Depending upon situation- or program- specifics, however, LEAs may be allowed to use Title III funds to supplement their core Language Instructional Education Program by acquiring educational technology resources and online services and providing professional development specially designed to support the unique language acquisition and academic instructional needs of English Learners (ELs), ELs with disabilities, educators of ELs (including “regular” classroom teachers and special educators who have EL students in their classes), and EL parents.

\*\*Awaiting further clarification from the US Department of Education.

**Anticipated Needs: Other**

LEA Unmet or Anticipated Need	Title Funds (I-V) and McK-V	IDEA	AEL	Perkins	CARES
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).
Costs associated with collaborative planning re: school reopening, continuity of operations/instruction, etc.	Not allowed.	Not allowed.	Not allowed.	Not allowed.	Allowable expense (category 6, 10, or 11).
Expenses related to child care for essential persons	Not allowed.	Not allowed.	Not allowed.	Not allowed.	Allowable expense (category 5 or 11).
Costs associated with coordination/planning with local and state health departments and other units of government re: school reopening and other COVID-related matters	Not allowed.	Not allowed.	Not allowed.	Not allowed.	Allowable expense (category 9 or 11).

## Anticipated Needs: Food Service

LEA Unmet or Anticipated Need	Nonprofit School Food Service Account	CARES
Hazard pay for school food service personnel and bus drivers, related to meal production and distribution of meals through the federal child nutrition programs	Allowable, if hazard or premium pay is covered by established personnel policies.	Allowable expense (category 5).
Salaries for food service personnel working to provide meals through the federal child nutrition programs during the pandemic	Allowable expense.	Allowable expense (category 5).
Packaging for unitized meal deliveries	Allowable expense.	Allowable expense (category 5).
Transportation and other costs associated with providing meals through the federal child nutrition programs during the pandemic	Allowable, if it meets the required criteria of reasonable, allocable, and necessary (2 CFR 200.404 and 200.405).	Allowable expense (category 5).
Printing of informational handouts to accompany the meals	Allowable, if the information is related to the meals program.	Allowable expense (category 5).
Salaries for food service staff unable to report to work due to COVID-19, when the absence is authorized	Allowable, if payment for such absences are covered under established personnel policies.	Allowable expense (category 5).
Non-refundable costs for events and activities cancelled due to COVID that would have been paid for out of the nonprofit school food service account	Allowable, if cost was incurred prior to the expiration of OMB Memo, M-20-17.	Allowable expense (category 5).
Personal Protective Equipment (e.g. gloves and face masks) for food service and food delivery personnel	Allowable expense.	Allowable expense (category 2 or 5).

School Food Authorities are reminded that a wide variety of costs associated with purchasing, preparing and distributing meals through the federal child nutrition programs are allowable uses of the Non-Profit School Food Service Account. However, the fixed per-meal reimbursement for meals served under the federal child nutrition programs may not be enough to cover all costs associated with meal service. In that case, other funds will need to be identified. For more information on general allowable costs for the non-profit school food service account, see Page 12-18 of the [USDA Indirect Cost Guidance](#). For specific COVID-19 allowable cost guidance, see [USDA Memo SP 21-20](#).

## 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 my ability to use funds before they expire?
- If the LEA participates in a Schoolwide option, 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.