



## CFP Committee of Practitioners (COP)

*Section 1603(b) of the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act of 2015: Each State educational agency that receives funds under this title shall create a State committee of practitioners to advise the State in carrying out its responsibilities under this title. The duties of such committee shall include a review, before publication, of any proposed or final State rule or regulation pursuant to this title.*

### AGENDA

**June 21, 2017**

*Vermont Agency of Education*

*Webinar -We ask that you [please register](#) if you plan to attend the COP Webinar on June 21<sup>st</sup>.*

**9:00am – 11:00am**

- 9:00 Welcome and Introductions
- 9:15 Overview of COP Responsibilities
- 9:30 Item #1 – Revision of the CFP Application Review Process  
(Presentation)
- 10:00 Item #2 – CFP Amendment Process  
(Presentation & COP Recommendations)
- 10:30 COP FY 18 Membership & Meetings
- 10:45 Wrap up & Adjourn



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## Item #1 - Revision of Consolidated Federal Program Application Review Process

Originally approved by COP August 2013  
**FY 18 Changes in Red**

*Implementation Procedure:* In reviewing Consolidated Federal Program (CFP) applications, the Agency of Education will expand beyond the historical approach that has focused on specific Title requirements. In addition, the Agency will also review from the perspective of alignment with the **school's or LEA's continuous improvement** goals. The purpose of this approach is to ensure that ESEA funds are being used as efficiently and effectively as possible toward the goal of improving student achievement.

This will take the form of a collaborative review process involving both CFP staff and other appropriate Agency staff. CFP staff have primary responsibility for working with **LEA** leadership teams in the context of **ESEA** compliance and the goal of continuous improvement. **Other Agency staff with a knowledge of school and LEA continuous improvement plans will be invited into the review process when they are either working with a specific LEA's application under review or have specific content knowledge needed to carry out the review.**

Specifically, Agency staff will pose the following questions:

- Does the proposed investment meet the intent of the Title(s)?
- Is the proposed investment reasonable and necessary?
- Is the proposed expenditure allowable under applicable Title rules?
- **Is the proposed investment based on the needs assessment and reflected in the continuous improvement plan?**
- **Does the investment meet the evidenced-based requirement under ESSA?**
- Does the proposed investment have the potential to improve teaching?
- Does the proposed investment have the potential to improve student achievement?
- Does the proposed investment reflect the goals of the applicant's continuous improvement plan?

Following the independent reviews described above, a collaborative review team will meet that will at a minimum consist of a Title I representative, a Title IIA representative, the CFP Grant Manager, and the **applicable Agency staff**. The review conducted by this team will be intended to integrate the conclusions of the independent reviews and assure that both regulatory compliance and continuous improvement have been considered. The result of this review will be conveyed in a letter to the applicant, which may express approval or may request revisions to the application.



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## Item #2 - CFP Amendment Review Process

### *Proposed Procedure:*

All investments should be based on a needs assessment and reflected in the LEA's or school's continuous improvement plan as appropriate.

1. After the initial grant is awarded, an LEA may submit one or more amendment(s) to the approved grant starting the second week of September through mid-April (date set by CFO).
2. An amendment is requested by the LEA by notifying the CFP Grants Manager.
  - a. From the date of an amendment being opened, the LEA will have 10 workdays to submit and eSign the amendment. The 10-day period will begin upon the date of the eSignature.
  - b. If not submitted within 10 workdays, then the grant will be closed without the proposed changes.
  - c. Amendments can be requested to be opened from September 5<sup>th</sup> to March 20<sup>th</sup>.
3. The amendment is reviewed by the appropriate Agency staff depending on the types of amendments. For example, if changes to Title I investments are made, the Title I staff would review but if changes are made to investments impacting multiple Titles, then all pertinent staff would review.
  - a. AOE reviewers will either approve or ask for edits in a single memo coordinated by the CFP Grants Manager.
  - b. AOE reviewers will have 10 work days to conduct their review
4. The memo will be sent to the LEA CFP Team Leader with a 10-work day time limit either to delete the questioned investments or to make the requested edits to the cited investments. The memo will state, "Make only the requested edits, no other changes will be allowed."
5. If the requested edits are not submitted and eSigned in the stated time frame, the questioned amended investments will be deleted and the grant award will be processed without those investments. Satisfactorily amended investments will be passed through. If additional changes are made outside of the review, they will be deleted. LEAs will be informed that once an amended grant is fully approved, they may request a new amendment.
6. Expenditures on amended investments cannot be made until the date of the executed amended grant award.

Agency staff will make the review of amendments a priority so that LEAs will be informed quickly whether or not a proposed investment is approvable.

**NB:** A workday is a day that the state offices are open – not a weekend day or state holiday. Days when the state offices are closed due to weather are not considered workdays. School vacation days are considered work days.

**Rationale:** Over the past few year, a significant number of amendments to the Consolidated Federal Programs (CFP) are left in an inactive state for a period of time. This has become a concern because if the amendment is not approved, none of the investments that are new are not allowed to be implemented until an amended grant award has been completed. Additionally reviewers struggle to determine the issues that have yet to be resolved when there is a significant amount of time between an initial review and a resubmission. The CFP team seeks to become more efficient in our grants management process and to assure that investments are approved in a timely manner.

**Impact:** Both reviewers and grantees will need to make work on an open amendment a priority. In addition, the CFP Team anticipates that this change will result in less potential audit issues as LEAs will not start implementing investments that have yet to be approved.

**Implementation Plan:**

FY 18 – Notify all LEAs of the change as soon as the new procedure is approved by the Leadership Team at AOE. Full implementation will begin when the amendments are open in September 2017.