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# **Title I, Comprehensive Support and Improvement Implementation Grant Guidelines**

## **Application FY 2021-2022 CSI Cohort FY2018-2019**

Authorized by Elementary and Secondary  
Education Act (ESEA)



Dr. Jill Underly  
State Superintendent  
Madison, WI

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# Table of Contents

I. Overview .....	5
II. Eligibility .....	5
III. Available Funds .....	5
IV. Use of Funds.....	5
A. Supplement, not Supplant .....	6
B. Determining Allowable Costs.....	6
V. Application Information .....	7
A. Timeline .....	7
B. Application .....	7
C. Financial Claims and Carryover .....	8
D. Implementation Activities To Inform Budget Decisions .....	8
VI. Monitoring for Implementation Grant .....	9

These guidelines discuss general program requirements and restrictions related to the administration of the Title I, Part A, Section 1003(a) Comprehensive Support and Improvement Grants awarded by the State of Wisconsin under the Elementary and Secondary Education Act (ESEA).

## **I. Overview**

The purpose of the Comprehensive Support and Improvement (CSI) Implementation Grant, authorized by the Elementary and Secondary Education Act (ESEA), is to provide Local Educational Agencies (LEAs) with additional funds and resources to assist CSI identified schools in implementation, monitoring and refinement of the improvement plan.

## **II. Eligibility**

Eligible applicants are LEAs, with one or more schools that have been identified as a CSI school. CSI schools are the lowest five percent of Title I schools based on the Every Student Succeeds Act (ESSA) indicators (academic achievement, student growth, progress toward English language proficiency, graduation rate, and absenteeism) or any school with a graduation rate below 67 percent. The Wisconsin Department of Public Instruction (DPI) is required to identify CSI Schools using the metrics defined in Wisconsin's ESSA State Plan. DPI will notify eligible applicants.

## **III. Available Funds**

The amount of available funds is based on the appropriation made available to Wisconsin from the USDE.

The allocation formula is based off Third Friday of September (TFS) enrollment from the previous school year. Schools identified as CSI with between 200 and 550 students will receive \$100,000. For any school identified as CSI with a TFS count greater than 550, the school will receive an additional \$400 per student above the 550 student enrollment count. Schools identified as CSI with fewer than 200 students will receive \$200 less than \$100,000 for every student below the 200 enrollment count.

If the LEA has more than one school identified for CSI, the LEA will receive one grant award for all of its schools combined. Additionally, the LEA will have discretion to allocate funds to each school identified as a CSI, but should determine each school's budget based on resource inequities and school needs.

## **IV. Use of Funds**

LEAs may use funds for implementation of the evidence-based improvement strategy/strategies identified in each school improvement plan. LEAs may use funds for salaries, fringe benefits, professional development, purchased services, supplies for implementation and stakeholder meetings, and other expenses for school improvement plan implementation.

## A. Supplement, not Supplant

An LEA shall use CSI grant funds to supplement the funds that would, in the absence of such federal funds, be made available from state and local sources. In other words, Title I funds may not be used to supplant (take the place of) state and local funds (20 U.S.C. 6321(b)).

ESSA requires LEAs to demonstrate compliance with the supplement not supplant requirement by documenting their methodology used to allocate state and local funding to Title I schools, demonstrating that each school still received the same amount of state and local funding it would have if it were not participating in Title I (20 USC 6321(b)(2)).

Most LEAs in Wisconsin are either completely exempt from having a methodology or may only need to have a methodology for one or two grade spans.

An LEA is not required to have a methodology if it has:

- only one school;
- only Title I schools; or
- grade spans that are all exempt. A grade span is exempt if it contains only one school, only non-Title I schools, or only Title I schools.

Source: US Department of Education. 2019. "Supplement not Supplant Under Title I, Part A of the Elementary and Secondary Education Act of 1965, as Amended by the Every Student Succeeds Act." Accessed August 2019. <https://www2.ed.gov/policy/elsec/leg/essa/snsfinalguidance06192019.pdf>

## B. Determining Allowable Costs

Each LEA is required to have and follow written procedures to determine allowable costs (2 CFR, Part 200). In order to determine if costs can be charged to the CSI grants, LEAs should ask themselves the following questions:

- Did the school receive its full share of local and state funds based on the LEA's methodology (if applicable)?  
*Some LEAs are required to document their methodology to ensure that each school received its full share of state and local funds regardless of Title I status.*
- If no methodology is required for a grade span or an LEA, did the school receive all of the state and local funds it would have received in the absence of CSI grant funding?  
*LEAs must ensure CSI grant fund supplement state and local funds that would, in the absence of CSI grant fund, be made available to the school (20 USC 6321(b)).*
- **Is the proposed budget item funding the strategy to address the needs identified in the school improvement plan?**  
*The budget item must support the strategy/strategies to address needs identified in the school implement plan (2 CRF, Part 200).*
- Does the cost adhere to the Uniform Grant Guidance, EDGAR, and the LEA policies?  
*Like all budget items charged to any federal grant from the United States Department of Education, the costs must adhere to the Uniform Grant Guidance, EDGAR, and LEA policies.*

If the LEA can answer "Yes" to all of these questions, the costs are likely allowable.

- Use the [CSI Budget Grant Funding Overview](#) resource to assist in deciphering costs allowed to support the implementation of your Evidence Based Improvement Strategies

## V. Application Information

### A. Timeline

October 31, 2021	Last date to submit school's continuous improvement plan into WISEgrants.
Ongoing	Strategies to address needs in the school improvement plans are approved by DPI.
Once one or more evidence-based strategies are approved by DPI	LEAs must budget for approved evidence-based strategies in WISEgrants.
June 30, 2022	All CSI grant funds encumbered. Carryover of unused funds is determined on an annual basis.
September 30, 2022	Final financial claims due.

### B. Application

The application contains two inter-connected requirements: the continuous improvement plan for each school and the budget for each approved strategy.

- 1. LEAs must upload the continuous improvement plan for each school in WISEgrants no later than October 31, 2021.**
- 2. The continuous improvement plan must reflect evidence of the following:** (Please refer to the "Accomplished" level on [Continuous Improvement Process Criteria and Rubric](#) for guidance). *NOTE: Schools utilizing the [Data Inquiry Journal](#), can export the DIJ into a pdf and upload the pdf into WISEgrants.*
  - school level needs assessment and root cause analysis
  - review resource inequities and plan to address identified inequities.
  - evidence of stakeholder engagement and improvement plan development
  - identify and name Evidence-Based Improvement Strategy that addresses needs/root cause. *NOTE: Evidence Based Improvement Strategies applied under Title I, Section 1003 (School Improvement) are required to have strong, moderate, or promising evidence (Tiers 1-3) as support:*
    - **Tier 1 – Strong Evidence:** supported by one or more well-designed and well-implemented randomized control experimental studies.
    - **Tier 2 – Moderate Evidence:** supported by one or more well-designed and well-implemented quasi-experimental studies.
    - **Tier 3 – Promising Evidence:** supported by one or more well-designed and well-implemented correlational studies (with statistical controls for selection bias).

1. **Once at least one strategy for one school is approved, LEAs may begin budgeting costs for that school's approved strategy. WISEgrants will require LEAs to budget costs for each approved strategy for each CSI school, but the LEA does not need to wait for each school to have all of their strategies approved before they can begin budgeting.**

The budget shall only contain expenses for the 2021-22 implementation grant year. LEAs must complete grant activities and encumber expenses by June 30, 2022.

- The grant's performance period ends June 30, 2022.
- Revisions to the budget should be completed before June 30, 2022. Budget revisions should be submitted as soon as a school/district know that revisions are needed.
- Carryover regarding any funds not expended by June 30, 2022 will be determined at that date.

DPI encourages LEAs to contact their business manager for assistance with the budget portion of the application, because LEAs shall adhere to the guidelines set by the [Wisconsin Uniform Financial Accounting Requirements \(WUFAR\)](#), [Education Department General Administrative Regulations \(EDGAR\)](#) and the [Federal Uniform Grant Guidance](#).

### **C. Financial Claims and Carryover**

LEAs may begin submitting claims once the first budget is approved. DPI requires LEAs to submit program fiscal reports (PI-1086) in WISEgrants at least quarterly during the grant period. A final program fiscal report is due September 30, 2022.

LEAs should direct all questions regarding financial claims to Ryan Egan, senior accountant, at (608) 266-1723 or [ryan.egan@dpi.wi.gov](mailto:ryan.egan@dpi.wi.gov).

LEAs must complete grant activities and encumber expenses by June 30, 2022.

LEAs may submit claims for approved budget items supporting strategies that date back to the subaward's Period of Performance Start Date as defined on the Grant Award document in WISEgrants. Any budget modification requests must be submitted to DPI in WISEgrants. Carryover allowability for funds not obligated after June 30, 2022, will be determined at the end of the grant funding year. If carryover is allowed, DPI will calculate carryover and load it into WISEgrants for the 2022-23 school year once final claims have been processed.

### **D. Implementation Activities To Inform Budget Decisions**

#### **1. Improvement Plan Refinement**

Continuous improvement is an ongoing process to implement an evidence-based improvement strategy. The school's continuous improvement model should reflect ongoing monitoring of student outcomes and educator practices to refine the plan. See

the “Accomplished” level in the Plan section and footnotes of the [Continuous Improvement Process Criteria and Rubric](#) sections, as required under ESSA. Schools are encouraged to contact their Title I consultant if the school determines significant changes to the plan are necessary.

**2. Evidence of Stakeholder Engagement and Plan Development**

Continue to engage stakeholders during plan implementation as appropriate to local context. Please refer to the “Accomplished” level on the [Continuous Improvement Process Criteria and Rubric](#) for guidance.

**3. Resource Inequities**

Throughout implementation of the improvement plan, continue to address and monitor resource inequities identified during the improvement implementation process. Schools may refer to the Resource Inequity Data Tool provided by the Wisconsin Department of Public Instruction and available in SAFE within WISEsecure. Please refer to the “Accomplished” level on [Continuous Improvement Process Criteria and Rubric](#) for guidance.

**VI. Monitoring for Implementation Grant**

Title I consultants will be reviewing budgets to ensure costs align with the implementation of the evidence-improvement strategy.

Grant specialists will be reviewing budgets to ensure costs align with guidelines. Additional program monitoring and reporting for a school’s continuous improvement plan will be addressed outside of the grant application guidance.