

**Department of Education** 

**Updated September 2024** 

# Title V, Part B Guidance

Rural Education Achievement Program (REAP)

## Introduction

The Every Student Succeeds Act (ESSA) of 2015 replaced the No Child Left Behind Act of 2001 and reauthorized the Elementary and Secondary Education Act of 1965 (ESEA), continuing a longstanding commitment to equal opportunity for all students. Title V, Part B of the ESSA authorized the Rural Education and Achievement Program (REAP) to address the unique needs of rural school local education agencies (LEAs or school districts; ESEA § 5201-5202). Acknowledging that these LEAs often "lack the personnel and resources needed to compete effectively for Federal competitive grants; and receive formula grant allocations in amounts too small to be effective in meeting their intended purposes," REAP provides LEAs flexibility in the use of Federal resources to serve their students (ESEA § 5202).

### **REAP Programs**

There are two formula grant programs authorized under Title V, Part B:

- The Small, Rural School Achievement (SRSA) Program, which awards funds directly to LEAs by the U.S. Department of Education (ESEA, Title V, Part B, Subpart 1); and
- The Rural and Low-Income Schools (RLIS) Program (ESEA, Title V, Part B, Subpart 2). It provides grants to the Iowa Department of Education (Department), which awards subgrants to eligible rural LEAs.

# Eligibility

An LEA is eligible to participate in RLIS if it meets the criteria of being low-income and rural, while SRSA eligibility requires LEAs to be both small and rural (ESEA §§ 5211(b) & 5221(b)). Eligibility criteria are based on income data, geographic classifications, and average daily attendance (ADA)<sup>1</sup> from the U.S. Census Bureau, National Center for Education Statistics (NCES), and the Department, respectively.

## **REAP Eligibility Criteria**

Program	Low-Income Criteria	Rural Criteria	Small Criteria
RLIS	20% or more of children ages 5 to 17 served by the LEA must be from families with incomes below the poverty line, based on data from the U.S. Census Bureau's Small Area Income and Poverty Estimates ( <u>SAIPE</u> ).	All schools within the LEA must have a NCES school <u>locale code</u> of 32, 33, 41, 42, or 43.	
SRSA		All schools within the LEA must have a NCES school <u>locale code</u> of 41, 42, or 43, or be located in an area of the State defined as rural by a governmental agency of the state.	An LEA must have a total ADA of fewer than 600 students or exclusively serve schools that are located in counties with a population density of fewer than 10 persons per square mile.

<sup>&</sup>lt;sup>1</sup> ADA, for the purposes of REAP eligibility, excludes virtual schools.

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## Dual Eligibility

LEAs that meet the eligibility criteria for RLIS and SRSA are referred to as "dual-eligible" LEAs. Dual-eligible LEAs cannot receive funding under both programs and must indicate their choice by submitting the appropriate application to the U.S. Department of Education for the SRSA program or to the Department for the RLIS program (ESEA § 5225). SRSA applicants will receive an award unless the statutory funding formula results in an allocation of \$0.

### Eligibility Process

The U.S. Department of Education begins determining REAP eligibility almost a year before it intends to make awards. The timeline below outlines the participation of LEAs in that process.

Timeline	LEA Process Action	
December	<ul> <li>Confirm the LEA's Unique Entity ID (UEI) is active in the System for Award Management (SAM.gov); and update the UEI, if necessary.</li> </ul>	
January – February	<ul> <li>Primary and secondary contacts receive email about the upcoming REAP subgrant award process.</li> <li>View the Master Eligibility Spreadsheet (MES) in the eligibility section of the <u>RLIS</u> page or <u>SRSA</u> page to verify:         <ul> <li>Eligibility data and</li> <li>Primary and secondary contacts.</li> </ul> </li> </ul>	
March – May	<ul> <li>If eligible for SRSA, the U.S. Department of Education will send the primary contact an application link via email.</li> <li>Apply for SRSA, unless LEA is dual-eligible and chooses RLIS.</li> </ul>	
May – June	<ul> <li>Confirm eligibility status (SRSA, RLIS, Dual-Eligible) is listed correctly on updated MES.</li> <li>Report primary and secondary contact changes.</li> <li>Confirm UEI registration in SAM.gov prior to SRSA funds being awarded.</li> </ul>	
July – September	<ul> <li>Award allocations:         <ul> <li>SRSA-eligible LEAs receive notification of award via email from U.S. Department of Education.</li> <li>RLIS-eligible LEAs apply for and receive subgrant through the Department.</li> </ul> </li> </ul>	

Award amounts are determined by a statutory formula. For more information on the formula, how to access SRSA funds and other guidance, see the <u>REAP Informational Document</u> or select REAP Resources on the <u>RLIS</u> page or the <u>SRSA</u> page.

# Alternative Fund Use Authority (AFUA)

The Alternative Fund Use Authority (AFUA) allows LEAs that qualify for SRSA to spend any Title II, Part A and Title IV, Part A funds they are eligible to receive on activities approved under the following ESEA programs:

- Title I, Part A;
- Title II, Part A;
- Title III, Part A;
- Title IV, Part A; and
- Title IV, Part B.

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AFUA does not authorize the transfer of funds. Rather, this key flexibility is designed to give small, rural SRSA-eligible LEAs greater latitude to spend their Federal funds in ways that best address their particular needs.

SRSA-eligible LEAs may exercise this authority even if they choose not to participate in SRSA or RLIS. LEAs choosing to exercise AFUA must notify the Department of their decision in the Allocations and Transfers collection by October 1.

## **RLIS Subgrants**

The Department awards RLIS subgrants to eligible LEAs that apply for the funds in the Consolidated Application for ESEA Title Programs, which is located in the Consolidated Accountability and Support Application (CASA). Applications are completed annually because eligibility may change from year to year.

#### Allowable Activities

LEAs may use RLIS awards for any allowable activities under Title I, Part A, Title II, Part A, Title III, Part A, and Title IV, Part A of the ESEA, as well as parental involvement activities. LEAs must comply with the requirements of those programs and additional requirements described following the table below.

Activities	Example
Activities authorized by Title I, Part A (Improving Basic Programs Operated by LEAs)	High-quality preschool or full-day kindergarten to facilitate the transition from early learning to elementary education programs.
Activities authorized by Title II, Part A (Supporting Effective Instruction)	Teacher supplemental professional development to enable an LEA to offer pre-calculus or organic chemistry classes.
Activities authorized by Title III (Language Instruction for English Learners and Immigrant Students)	Evidence-based strategies to accelerate the acquisition of content knowledge for English learners.
Activities authorized by Title IV, Part A (Student Support and Academic Enrichment)	Improving instruction and student engagement in science, technology, engineering, and mathematics (STEM), including computer science, and increasing access to these subjects for underrepresented groups.
Parental Involvement Activities	Creation of a parental review committee to provide input on the LEA's curriculum development.

The Guide to Using REAP Funds on the <u>REAP</u> page includes a searchable list of possible uses of RLIS funds.<sup>2</sup> It is not an exhaustive list and is illustrative only. For information on requirements for the Title programs listed in the Activities column of the table above, see individual program guidance on the Department's <u>ESSA Guidance and Allocations</u> page.

#### Allowable Costs

LEAs must use funds in compliance with federal and state requirements, including signed assurances and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, commonly referred to as Uniform Grant Guidance (<u>2 CFR Part 200</u>). Factors to consider include but are not limited to:

• **Necessary** – The cost is required for the proper and efficient performance of the subgrant (2 CFR §§ 200.403-404). Goals and objectives based on an annual need assessment can be a helpful lens for determining if a cost is necessary.

<sup>&</sup>lt;sup>2</sup> SRSA LEAs may also use this guide to search possible uses of the SRSA funds.

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- **Reasonable** The nature and amount of the cost is what a reasonable person would expend under similar circumstances, e.g., ordinary and necessary costs, market price for comparable goods and services (2 CFR §§ 200.403-404).
- Allocable The cost is incurred specifically for the benefit of the program and distributed proportionately in relation to the benefit (2 CFR § 200.405). If a subgrant charges 100% of a cost to the subgrant then the entire benefit from the expenditure, 100% must serve the purpose of the subgrant.
- **Conform to limitations or exclusions** Costs are permissible under the program statute, the subgrant award, and Uniform Grant Guidance (2 CFR § 200.403(b)).
- Consistent with policies and procedures Costs are consistent with LEA policies and procedures that are applied uniformly across funding sources, whether Federal, State, or local (2 CFR § 200.403(c)).
- Consistent treatment Costs are treated consistently. For example, a cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose and in like circumstances has been allocated to the Federal award as an indirect cost (2 CFR § 200.403(d)).
- Accounted for in accordance with Generally Accepted Accounting Principles (GAAP) The cost is determined in accordance with GAAP, except as otherwise provided for in the Uniform Grant Guidance (2 CFR § 200.403(e)).
- **Cost sharing or matching** Costs may not be used to meet cost sharing or matching requirements of any other federally-funded program (2 CFR § 200.403(f)).
- Documentation Costs are adequately documented (2 CFR § 200.403(g)).
- Budget period Costs are incurred during the approved budget period (2 CFR § 200.403(h)).
- Supplemental cost that does not supplant Funds must be used to add to (supplement) and not replace (supplant) any other Federal, State, or local education funds (ESEA § 5232). Thus, activities must be supplemental in nature. Supplanting is presumed if an activity:
  - $\circ$   $\;$  Would ordinarily be covered with other Federal, State, or local funds;
  - $\circ$   $\,$  Was previously funded with other Federal, State, or local funds; or
  - o Is State-mandated or required by Federal law.

The presumption of supplanting may be rebutted with written, contemporaneous documentation demonstrating that the activity and cost is supplemental.

LEAs budget RLIS allocations in the CASA program application according to their planned allowable activities. Quarterly claims must align with that budget and related requirements (see the <u>ESSA Guidance</u> <u>and Allocations</u> page).

### AFUA

Dual-eligible LEAs that elect to receive RLIS funds may exercise this alternative fund use authority available to SRSA-eligible LEAs. It authorizes SRSA-eligible LEAs to spend any Title II, Part A and Title IV, Part A funds they receive on activities allowed under several ESEA programs, as previously discussed. LEAs choosing to exercise AFUA must notify the Department of that decision in the Allocations and Transfers page by October 1.

## Maintenance of Effort (MOE)

To receive RLIS funds in any fiscal year, an LEA must maintain its fiscal effort of non-federal (State and local) expenditures for the provision of free public education (ESEA § 8521). Specifically, aggregate expenditures or cost per student for the preceding year may not be less than 90% of the second preceding fiscal year. The MOE requirement does not apply to the SRSA program.

### Equitable Services

An RLIS-eligible LEA is responsible to provide equitable services for nonpublic school students and teachers if it receives Title II, Part A or Title IV, Part A funds. For more information, see Department guidance for Title II, Part A and Title IV, Part A.

## Resources

#### State Resources

- ESSA Guidance & Allocations
- <u>Consolidated Application for ESEA Title Programs Requirements and Deadlines</u>

#### Federal Resources

- <u>Elementary and Secondary Education Act of 1965</u> (ESEA), as amended, and reauthorized by the Elementary and Secondary Education Act (ESSA)
- <u>REAP Informational Document</u>
- U.S. Department of Education, Office of Elementary and Secondary Education (OESE), <u>Rural</u> <u>Education Achievement Program (REAP)</u>
  - U.S. Department of Education, OESE, Rural and Low-Income School Program (RLIS)
  - U.S. Department of Education, OESE, Small, Rural School Achievement Program (SRSA)