



Title II, Part A Guidance

Supporting Effective Instruction Subgrants

Introduction

The Every Student Succeeds Act of 2015 reauthorized the Elementary and Secondary Education Act of 1965's (ESEA) Title II, Part A (Title IIA) – Supporting Effective Instruction program. The purpose of this federal program is to provide grants to state educational agencies (SEAs) and subgrants to districts to:

1. Increase student achievement consistent with the challenging state academic standards;
2. Improve the quality and effectiveness of teachers, principals, and other school leaders;
3. Increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and
4. Provide low-income and minority students greater access to effective teachers, principals, and other school leaders (ESEA § 2101).

Program Intent

This program intends to develop, implement, and evaluate comprehensive professional development programs and activities to address the learning needs of all students.

Notice of Allocation

The Iowa Department of Education (Department) will provide notice in a timely manner and after Title IIA program estimates have become available to the state. The Department is responsible for determining districts' allocations and ensuring the districts' provision of equitable services to nonpublic school teachers, principals, and other school leaders.

Important Definitions

Professional Development

All professional development must meet the definition provided in the ESEA. Specifically, the ESEA defines professional development as activities that are **sustained** (not stand-alone, one-day, or short-term workshops), **intensive**, **collaborative**, **job-embedded**, **data-driven**, **and classroom-focused** (ESEA § 8101(42)(B)).

Other School Leader

The term "other school leader" means principal, assistant principal, or an individual who is both—

1. An employee of an elementary school or secondary school **AND**
2. Responsible for the daily instructional leadership and managerial operations in the elementary or secondary school (ESEA § 8101(44)).

Both parts of the definition must apply for funds to be used for such a person. For example, central office staff meet the first part of the definition but may not meet the second part, so they may not qualify to receive professional development services using Title IIA funds.

Subgrant Requirements and Recommended Actions

To receive a Title IIA – Supporting Effective Instruction subgrant, a school district must complete a short list of requirements. Such requirements include submitting an application to the Department in the Consolidated Accountability and Support Application's (CASA) Consolidated Application by October 15 of each year and submitting quarterly reimbursement claims.

ESEA Citation	Action. Related Resource	Recommended/Required
2102(3)	<p>In developing the application, a district must:</p> <ul style="list-style-type: none"> • Meaningfully consult with teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders, parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the Title IIA purpose; • Seek advice from the individuals and organizations regarding how best to improve the district's activities to meet the Title IIA purpose; • Coordinate the district's Title IIA activities with other related strategies, programs, and activities being conducted in the community. 	Required
1111(d), 1124(c), & 2102(b)(1)-(2)	<p>Submit an application in the CASA, including program questions, a budget, and program assurances. Description of how the district will prioritize funds to schools served by the agency that are implementing comprehensive support and improvement activities and targeted support and improvement activities and have the highest percentage of children counted. Each application must include the following descriptions:</p> <ol style="list-style-type: none"> 1. Title IIA activities to be carried out by the district and how these activities will be aligned with challenging state academic standards. 2. The district's systems of professional growth and improvement, such as induction for teachers, principals, or other school leaders and opportunities for building the capacity of teachers, and opportunities to develop meaningful teacher leadership. 3. How the district will prioritize funds to schools served by the agency that are implementing comprehensive support and improvement activities and targeted support and improvement activities and have the highest percentage of children counted. 4. How the district will use data and ongoing consultation to continually update and improve Title IIA activities. 	Required
8501	<p>Assure that the district will:</p> <ul style="list-style-type: none"> • Comply with ESSA section 8501 (regarding participation by nonpublic school children and teachers). • Coordinate professional development activities authorized under Title IIA program with professional 	Required

ESEA Citation	Action. Related Resource	Recommended/Required
	development activities provided through other federal, state, and local programs.	
2103(b)	Selection of local uses of funds - Types of Activities.	Required
2102(b)(3)	<p>Engage in meaningful consultation with nonpublic schools within each district. Nonpublic consultation cannot interfere with the timely submission of the Title IIA application. Nonpublic consultation must:</p> <ul style="list-style-type: none"> • Occur year round but agreed upon services must be entered into the CASA between January 1 and March 15 for the upcoming school year; • Occur before the district makes any decisions that affect eligible students' opportunities to participate; and • Equitable services are determined based on the specific needs identified by the nonpublic (e.g., student, teacher). They are not based on: <ul style="list-style-type: none"> ○ The needs of nonpublic school itself nor ○ A dollar amount for services. <p>All parties represented in the consultation process should:</p> <ul style="list-style-type: none"> • Possess the authority to act on behalf of the school district, area education agency (AEA), or nonpublic school; and • Seek to reach an agreement on how to provide equitable and effective programs for eligible nonpublic school students. <p><i>For additional information on the equitable services procedure and process, see the following ESSA's Changes and Equitable Services Requirements section.</i></p>	Required
2104	Submit annual reports regarding how Title IIA funds are being used in the CASA.	Required
2113(f) & 2123(b)	<p>Comply with the supplement vs supplant requirement. The supplement not supplant provision requires that federal funds be used to enhance the regular educational program. This means that federal funds cannot be used to supplant, or take the place of, funds that would have been spent if these federal Title funds were not available.</p> <ul style="list-style-type: none"> • Supplementing: Using federal funds to enhance, expand, increase, or extend the programs and services offered with other federal, state, and/or local funds. • Supplanting (unallowable): Using federal funds to fund (in total or in part) a program or service that is required to be provided or was previously funded by other federal, state, and/or local funds. 	Required
	Plan for Title II, Part A implementation. See the Using Evidence guidance.	Recommended

ESEA Citation	Action. Related Resource	Recommended/Required
	Implement Title II, Part A activities. See the Using Evidence guidance .	Recommended

Allowable Activities

The ESEA defines professional development as activities that are **sustained** (not stand-alone, 1-day, or short term workshops), **intensive**, **collaborative**, **job-embedded**, **data-driven**, and **classroom-focused** (ESEA § 8101(42)).

- Providing high-quality, personalized professional development that is evidence-based, to the extent the state (in consultation with in the state) determines that such evidence is reasonably available, for teachers, instructional leadership teams, principals, or other school leaders, that is focused on improving teaching and student learning and achievement, including supporting efforts to train teachers, principals, or other school leaders to:
 - Effectively integrate technology into curricula and instruction (including education about the harms of copyright piracy);
 - Use data to improve student achievement and understand how to ensure individual student privacy is protected, as required under section 444 of the General Education Provisions Act (commonly known as the Family Educational Rights and Privacy Act of 1974; 20 U.S.C. 1232g) and state and local policies and laws in the use of such data;
 - Effectively engage parents, families, and community partners, and coordinate services between school and community;
 - Help all students develop the skills essential for learning readiness and academic success;
 - Develop policy with school, district, community, or state leaders; and
 - Participate in opportunities for experiential learning through observation.
- Providing programs and activities to increase:
 - The knowledge base of teachers, principals, and other school leaders on instruction in the early grades and on strategies to measure whether young children are progressing; and
 - The ability of principals or other school leaders to support teachers, teacher leaders, early childhood educators, and other professionals to meet the needs of students through age eight, which may include providing joint professional learning and planning activities for school staff and educators in preschool programs that address the transition to elementary school.
- Providing training, technical assistance, and capacity-building in districts to assist teachers, principals and other school leaders with selecting and implementing formative assessments, designing classroom-based assessments, and using data from such assessments to improve instruction and student academic achievement, which may include providing additional time for teachers to review student data and respond, as appropriate.
- Carrying out in-service training for school personnel in:
 - The techniques and supports needed to help educators understand when and how to refer students affected by trauma and children with (or at risk of) mental illness;
 - The use of referral mechanisms that effectively link such children to appropriate treatment and intervention services in the school and in the community, where appropriate;
 - Forming partnerships between school-based mental health programs and public or private mental health organizations; and
 - Addressing issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism.
- Developing or improving a rigorous, transparent, and fair evaluation and support system for teachers, principals, or other school leaders that:
 - Is based in part on evidence of student achievement, which may include student growth; and
 - Must include multiple measures of educator performance and provide clear, timely, and useful feedback to teachers, principals, or other school leaders.
- Developing and implementing initiatives to assist in recruiting, hiring, and retaining effective teachers, particularly low-income schools with high percentages of ineffective teachers and high percentages of

students who do not meet the challenging state academic standards, to improve within-district equity in the distribution of teachers, consistent with section 1111(g)(1)(B), such as initiatives that provide:

- Expert help in screening candidates and enabling early hiring;
 - Differential and incentive pay for teachers, principals, or other school leaders in high-need academic subject areas and specialty areas, which may include performance-based pay systems;
 - Teacher, paraprofessional, principal, or other school leader advancement and professional growth, and an emphasis on leadership opportunities, multiple career paths, and pay differentiation;
 - New teacher, principal, or other school leader induction and mentoring programs that are designed to:
 - 1. Improve classroom instruction and student learning and achievement; and
 - 2. Increase the retention of effective teachers, principals, or other school leaders;
 - The development and provision of training for school leaders, coaches, mentors, and evaluators on how accurately to differentiate performance, provide useful feedback, and use evaluation results to inform decision-making about professional development, improvement strategies, and personnel decisions; and
 - A system for auditing the quality of evaluation and support systems.
- Developing programs and activities that increase the ability of teachers to effectively teach children with disabilities (including children with significant cognitive disabilities) and English learners, which may include the use of multi-tier systems of support and positive behavioral intervention and supports, so that such children with disabilities and English learners can meet the challenging state academic standards.
 - Providing training to support the identification of students who are gifted and talented, including high ability students who have not been formally identified for gifted education services, and implementing instructional practices that support the education of such students, such as:
 - Early entrance to kindergarten;
 - Enrichment, acceleration, and curriculum compacting activities; and
 - Dual or concurrent enrollment programs in secondary school and postsecondary education.
 - Recruiting qualified individuals from other fields to become teachers, principals, or other school leaders, including mid-career professionals from other occupations, former military personnel, and recent graduates of institutions of higher education with records of academic distinction who demonstrate potential to become effective teachers, principals, or other school leaders.
 - Developing and providing professional development and other comprehensive systems of support for teachers, principals, or other school leaders to promote high-quality instruction and instructional leadership in science, technology, engineering, and mathematics subjects, including computer science.
 - Providing high-quality professional development for teachers, principals, or other school leaders on effective strategies to integrate rigorous academic content, career and technical education, and work-based learning (if appropriate), which may include providing common planning time, to help prepare students for postsecondary education and the workforce.
 - Supporting the instructional services provided by effective school library programs.
 - Providing training for all school personnel, including teachers, principals, other school leaders, specialized instructional support personnel, and paraprofessionals, regarding how to prevent and recognize child sexual abuse.
 - Developing feedback mechanisms to improve school working conditions, including through periodically and publicly reporting results of educator support and working conditions feedback.
 - Carrying out other activities that are evidence-based, to the extent the state determines that such evidence is reasonably available, and identified by the district that meet the purpose of this title.
 - Reducing class size to a level that is evidence-based to the extent that the state determines that such evidence is reasonably available, to improve student achievement through the recruiting and hiring of additional effective teachers particularly in low-income schools **(Public school districts only)**.

Note on Class Size Reduction

Title IIA funds may be used to reduce class size if the initiative meets all the following criteria, which have been established by scientifically-based research and have been based upon a needs assessment. The impact on student achievement must be measurable.

- Based on local needs assessment; **and**
- Must reduce class size to 17-22 or fewer; **and**
- In grades K-3; **and**
- In classes taught by highly-qualified and highly-effective teachers who adjust instructional strategies to fit reduced class size

ESSA's Changes and Equitable Services Requirements

Requirements

The ombudsman should:

- Serve as the Department's primary point of contact for addressing questions and concerns from nonpublic school officials regarding the provision of equitable services under Title programs.
- Monitor and enforce the equitable services requirements under Title programs and, thus, should have a significant role in the state's monitoring process.
- Ensure that nonpublic school officials know how to contact the ombudsperson.
- Rachel Bosovich is serving as the ombudsperson. Rachel Bosovich can be reached at rachel.bosovich@iowa.gov

OBLIGATION OF FUNDS

The equitable share allocated to a district for educational professional development services to eligible nonpublic school children, teachers, and other school leaders, must be obligated in the fiscal year for which the district receives the funds (ESEA §§ 1117(a)(4)(B) & 8501(a)(4)(B)).

- The purpose of this requirement is to ensure that a district uses the funds available under Title IIA to provide equitable services in the fiscal year for which the funds were appropriated to ensure that eligible teachers, principals, and other school leaders receive professional development services to which they are entitled in a timely manner.
- This provision reinforces the requirement that a district conducts timely consultation with nonpublic school officials to design appropriate equitable services so that those services can begin at the beginning of the school year for which the funds are appropriated.

COMPLIANCE

The Department must provide equitable services directly or through contracts with public or private agencies, organizations or institutions; if appropriate nonpublic school officials have:

- Requested that the Department provide such services directly; and
- Demonstrated that a district has not met applicable equitable services requirements in accordance with the procedures for making such a request, as prescribed by the Department (ESEA §§ 1117(b)(6)(C) & 8501(c)(6)(C)).

COMPLAINT PROCESS

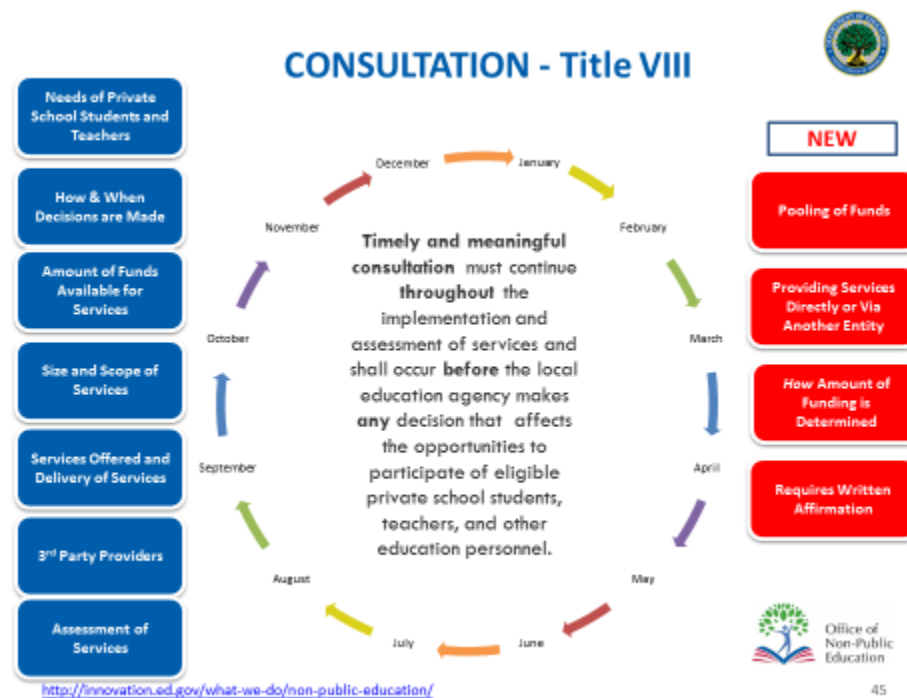
The Department has to respond to a complaint from parents, teachers, or other individuals concerning violations in 45 days.

CONSULTATION

The goal of the consultation is an agreement between the district and appropriate nonpublic school officials on how to provide equitable and effective professional development activities and/or programs for eligible

nonpublic school teachers, principals, and other school leaders (ESEA §§ 1117(b)(1) and 8501(c)(1) & (5)). The consultation process has been expanded to include the following:

- How the amount of funds available for equitable services is determined.
- Whether the public school district will provide those services directly or through a third-party provider.
- Whether to provide equitable services by:
 - Creating a pool of funds with all funds allocated under title programs or
 - On a school-by-school basis based on the individual school's proportionate share of funds available.
- Each district must maintain records and provide the Department a written affirmation signed by officials that a meaningful consultation has occurred. This requirement can be completed in the CASA Consolidated Application's Equitable Services for Nonpublic Schools collections. Districts are required to upload all consultation documentation to the application. Applications will not be approved by the Department until all proper documentation is provided.



Additional Information

The options for using funds by a nonpublic school have not changed to provide equitable professional development services. A district continues to have the option of expending funds for equitable services on a school-by-school basis or by pooling. The only change is that the statute now specifies that a district must consult with nonpublic school officials regarding these options.

Formula to determine the amount required for Title IIA equitable services to private school teachers and other educational personnel: The amount a district must reserve to provide equitable services for private school teachers, principals, and other school leaders for Title IIA services is based on the district's total Title IIA allocation, less administrative costs. The equitable share services for Title IIA must be calculated on the basis of the district's total Title IIA allocation. Administrative costs are still taken "off the top". The district's equitable share is determined by first calculating the amount of Title IIA funds available on a per-pupil basis, based on the total of all public and nonpublic school students (enrolled in participating nonpublic elementary and secondary schools), in areas served by the district - regardless of a student's residency. This amount is then multiplied by the number of students enrolled in participating nonpublic schools.

The Department will determine the equitable share available for Title IIA equitable services for nonpublic school teachers, principals, and other school leaders by calculating, on a per-pupil basis, the amount

available for all public and nonpublic school students enrolled in participating nonpublic elementary and secondary schools in areas served by the district (regardless of a student's residency), taking into consideration the number and needs of the children, their teachers and other school leaders to be served.

Title IIA Formula Equitable Services

The following is an example of the formula to determine the amount for Title IIA equitable services:

Component	Number
A. Number of Students	
A1. District Enrollment	900
A2. Participating Nonpublic Schools Enrollment	100
A3. Total Enrollment = A1+A2	1,000
B. Title IIA Allocation	
B1. Total District Allocation	\$1,000,000
B2. Administrative Costs (public and nonpublic school programs)	\$50,000
B3. District Allocation Minus Admin Costs = B1-B2	\$950,000
C. Per Pupil Rate	
C1. B3 divided by A3	\$950
D. Equitable Services	
Amount district must reserve for equitable services for nonpublic school teachers, principals, and other school leaders = A2xC1	\$95,000

Types of Activities a District May Now Provide to Nonpublic School Participants

A district may continue to use Title IIA funds to provide professional development activities for teachers, principals, and other school leaders to address the specific needs of their students. Other permissible uses of Title IIA equitable share for the benefit of nonpublic school teachers, principals, and other school leaders **are and must:**

- Be an allowable local use of Title IIA funds under the authorizing statute.
- Meet the specific needs of students enrolled in a nonpublic school, and not the school itself.
- Ensure that the district responsible for providing equitable services retains control of the funds used to provide such services. In addition, equitable services must be provided by either an employee of the public agency or through a contract by the public agency with an individual, association, agency, or organization. These providers must be independent of the nonpublic school and any religious organization, and the employment or contract must be under the control and supervision of the public agency.

Important note: Equitable services under Title IIA may not be used for class-size reduction in a nonpublic school because contracts for nonpublic school teachers and staff would be inconsistent with the requirements in ESEA section 8501(d) regarding public control of funds and the supervision and control of employees or contractors.

State-Level Activities and the Participation of Nonpublic Schools

State-level activities in which nonpublic school teachers, principals, and other school leaders may participate should be determined in consultation between the Department and appropriate nonpublic school representatives. But as with the permissible uses of Title IIA funds a district makes available for equitable services any activity the Department provides to nonpublic school teachers, principals, and other school leaders under Title IIA must primarily benefit the children enrolled in the nonpublic school, not the school itself.

Questions and Additional Resources

For questions and resources, contact Isbelia Arzola, Consultant for Title IIA, at isbelia.arzola@iowa.gov.