Q. Can you hire a special education teacher but not count it toward MOE. If so, how would you code it in LEAPS?
A. If you hire a special education teacher with federal funds (IDEA or IDEA ARRA), it will not count toward increasing your MOE. You would code the teacher to the federal source.

Q. In reducing MOE with 50% money, what happens in two years? Can a system still continue to not put in that amount?
A. An LEA choosing to take advantage of this flexibility will be required to maintain effort at the reduced level in subsequent years. After the two years, the LEA may have to pick up the required personnel or activities that were paid with the stimulus money (which will be gone). The personnel or activities will have to be paid with funds from other funding streams (local or state funds) after the IDEA ARRA funds are no longer available. This will cause your MOE to go back up by the corresponding amounts of local or state funds expended.

Q. Can any stimulus money be used for a central office administrator position?
A. Yes, provided they are performing programmatically approved administration.

Q. Can Title I ARRA funds be used to pay teachers only in schoolwide schools?
A. Title I ARRA funds may be used to pay for teachers in both schoolwide and targeted assistance schools. Teachers paid with Title I funds in targeted assistance schools may only serve identified students. All current rules, including the fiscal issues requirements, for supporting teachers in schoolwide and targeted assistance schools with Title I funds apply to ARRA funds.

Q. Credit Recovery—only for schoolwide (Title) schools?
A. The question each system should ask is how is Credit Recovery being paid in non-Title I schools. If state and local funds are being used to fund Credit Recovery in non-Title I schools, state and local funds should be used to fund Credit Recovery in Title I schools.

Q. The $5,000 we have to get permission for—is that one item? Which fund?
A. Any capitalized equipment (unit cost of $5,000 or more) must be pre-approved before purchase with IDEA ARRA (or any federal) funds. Capitalized equipment must be maintained on the LEA inventory. A supplemental inventory should also be maintained for all equipment and materials valued at less than $5,000.

Q. If my system is losing 6.40 teachers due to changes in divisors, can I move 6.4 units to federal without supplanting due to loss of state funding?
A. You could pay for special education teachers with the IDEA funds as long as the school system continues to maintain maintenance of effort. If it does not maintain MOE, it will be supplanting. There is no allowance made because of “loss of state funding” for special education like there is for Title I money.

A. Yes, the system would not be supplanting because the state units are no longer allocated to the system. Board action must be taken in order to fund positions with federal funds that were previously funded with state and/or local fund sources that are no longer available due to the precipitous decline in the economy. The action of the board is not to eliminate the position, but to document that state/local funds are no longer available due to declining revenues. The funded position must be applicable to the Title I program and based on the current needs assessment. State Fiscal Stabilization Funds should be used first to fill in for lost funding. If Title I ARRA funds are used for personnel, systems must follow the same procedures as for Title I, Part A funds (i.e., be part of the discussion of the LEA Advisory Committee, a decision of the school based on the needs assessment and part of the school-level advisory committee included in the LEA approved CIP, and meet all the fiscal issues requirements). Federal funds cannot be used to pay for positions that are required or receive state-funded allocations (such as CFO, principal, etc.).
Q. Do we have to have our districtwide Federal Programs Committee (made up of parents, teachers, administrators, etc.) approve the plans for our Title I ARRA funds or can we just make administrative decisions and record appropriately in eGap?
A. Yes, the use of Title I ARRA funds must follow the same procedures as Title I, Part A, funds.

Q. Can we use the Title I ARRA funds for professional development for the entire school staff at a targeted assistance school as long as the Title I teacher gets the same professional development?
A. Professional development paid with Title I funds in a targeted assistance school should be based on the needs of the Title I teachers and students. Professional development activities can include regular teachers if the activities are targeted at the needs of the Title I students with the assumption the professional development will improve the instruction provided to Title I students in the regular classroom.

Q. May we use the 15% rule for administration from these funds?
A. An LEA may use up to 15% of the Title I ARRA funds to administer the federal programs included in the consolidated grant.

Q. If we increase PPA, then do we have to abide by the rule not to reduce more than 15% when funds are reduced after stimulus money?
A. All current Title I regulations apply to the ARRA funds.

Q. Is FY 2010 allocation for FY 2010 only or total for first and second year (ex. 900,000 FY 2010 is for one year)? May it be carried over FY 2011 (not to exceed 15%)?
A. Title I ARRA funds are FY 2010 funds. Their initial period of availability ends September 30, 2010, and all unobligated Title I ARRA funds become carryover as of that date. Carryover is limited to 15% of allocation, unless a waiver is requested.

Q. For maintenance of effort calculation for FY 2010 will the SFSF $177,488,331 be “coded” or counted as state funds?
A. Once the Governor has been given approval by the Secretary of Education, the LEA may count the State Fiscal Stabilization Funds under the act that are used for special education as non-federal funds for purposes of determining whether an LEA has met the IDEA, Part B, MOE requirements.

Q. Is there a limit on the amount of special education funds that can be used on administration?
A. There are no limits in IDEA as long as all students with disabilities receive FAPE.

Q. Could you pay a school secretary with special education funds?
A. There are no limits in IDEA as long as all students with disabilities receive FAPE.

Q. Can technology funds be used to pay a distance learning/online course facilitator?
A. Yes, Title II Part D (EETT) funds can be used for a distance learning/online course facilitator as long as “not supplanting” is met. A combination of Title II Part D, Title I School Wide, and IDEA can also be used. Federal funds may be used to supplement state and local efforts. Board action must be taken in order to fund positions with federal funds that were previously funded with state and/or local fund sources that are no longer available due to the precipitous decline in the economy.

Q. IDEA MOE: Will the reduction be temporary or will the rate go back to 2008 levels after the ARRA money is gone?
A. An LEA choosing to take advantage of the 50% reduction flexibility will be required to maintain effort at the reduced level in subsequent years. After the two years, the LEA may have to pick up the required personnel or activities that were paid with the stimulus money, which is now no longer available. The personnel or activities will have to be paid with funds from other funding streams (local or state funds) after the IDEA ARRA funds are no longer available. This will cause your MOE to go back up by the corresponding amounts of local or state funds expended.

Q. Can a system with a special education coordinator being paid with local money start paying him/her with the new IDEA money without supplanting? Our system is one that has flexibility with MOE?
A. You may pay your special education coordinator with federal IDEA funds and it will not be viewed as supplanting as long as your school system maintains maintenance of effort with state and local funds.
Q. Is the Governor going to release the rest of the Rainy Day Fund or does he think this solves our problem?
A. At this time we have had no indication as to whether the Governor is or is not going to release it. It is important that we focus on understanding the Federal Stimulus legislation and stay abreast of the state legislative budgeting process that is ongoing in the Alabama Legislature. The Governor has until late September to decide on the Rainy Day Fund during the proration of FY 2009.

Q. Are there any funds in any of the pools of money for renovation or construction?
A. It depends. State Fiscal Stabilization Funds may be used; however, we encourage you to use these funds to protect employment opportunities as much as possible. All construction, modernization, renovation, or repair activities under the ARRA are subject to the applicable requirements in the ARRA and other Federal statutes.

Q. eGap does not open until July 1. How will we get federal funds before then if everything runs through eGap?
A. LEAs may request reimbursement for expenditures after they have an approved application. SDE staff are working with eGAP developers to provide access to eGAP by June 1.

Q. Will units paid with State Fiscal Stabilization Funds be counted on comparability report?
A. No. To meet the Title I, Part A comparability requirements, an LEA must use state and local funds in each Title I school to provide services that, taken as a whole, are at least comparable to the services it provides in non-Title I schools. Because State Fiscal Stabilization Funds are federal funds, they are not included in comparability determinations. Foundation program law requires the equitable distribution of state resources on a per-student or per-unit basis to each cost center.

Q. Can units paid in FY 2009 with local funds be paid with IDEA or Title I? How can we document loss of local revenue?
A. You could pay for special education teachers with the IDEA funds as long as the school system continues to maintain maintenance of effort. If it does not maintain MOE, it will be supplanting. There is no allowance made because of “loss of state funding” for special education like there is for Title I money.

A. Board action must be taken in order to fund positions with federal funds that were previously funded with state and/or local fund sources that are no longer available due to the precipitous decline in the economy. The action of the board is not to eliminate the position, but to document that state/local funds are no longer available due to declining revenues. The funded position must be applicable to the Title I program and based on the current needs assessment. Title I ARRA funds must follow the same procedures as Title I, Part A, funds (i.e., be part of the discussion of the LEA Advisory Committee, a decision of the school based on the needs assessment and part of the school-level advisory committee, be included in the LEA approved CIP, and meet all the fiscal issues requirements).

Q. Title II Part D funds “starting over,” does that mean those who have already been awarded funds may receive them again, and those who did not may receive none at all?
A. The competitive portion of Title II Part D ARRA will be a separate competition. We anticipate the application process in mid-summer.

Q. Will there be a standard way to post ARRA information on the LEA Web sites?
A. Reporting requirements have not been determined by the U. S. Department of Education.

Q. What is EDEN (Education Data Exchange Network)? What part will EDEN play in the ARRA process?
A. EDEN is a national reporting database. It is unknown at this time what role EDEN might play in the reporting process for Title I ARRA funds. More information is provided to the SDE, more information will be provided to the LEAs. The five EDEN indicators that related to technology will be used as part of the Title II Part D (EETT) ARRA data collection process. Current plans are to collect this data from LEAs during the annual technology plan process.

Q. How will ARRA information be tracked in eGap?
A. It will be tracked in the same manner as any other Federal entitlement and competitive grant.

Q. In the plan we are required to submit, must we show sustainability after two years?
A. There will be no requirement to ensure sustainability after two years; however, we do want to remind you that ARRA funds should be used not necessarily to provide the status quo, but instead to create transformational opportunities.

Q. What data system will we use to track the academic process?
A. Systems will use current formative and summative assessments to document academic progress and are encouraged to explore and implement additional measures for documenting successful use of funds. When planning for the use of Title I funds, careful consideration should be given to the evaluation process realizing that it is likely that federal reporting will require evidence of the impact of ARRA funds. As the SDE receives additional information regarding reporting for the U.S. Department of Education, information will be shared with school systems.

Q. Will there be an application process for Year 2 or more for special grants?
A. No, but LEAs may choose to complete an amendment that may include a change in program application.
Q. Will we be allowed to use “set-asides” out of Title I for systemwide initiatives?
A. Yes, it will be allowed for Title I participating schools based on the needs assessment. Funds set aside for LEA initiatives must be used to support LEA efforts and cannot be used to support individual schools. Funds cannot be set aside to serve individual schools that could in essence give a higher PPA to the school and possibly serve schools out of rank order.

Q. Are we permitted to use any Title I funds for students who qualify for free or reduced meals in a non-Title I school (Targeted Assistance)?
A. No, Title I funds are for use in Title I schools only.

Q. What are the criteria and process for an IDEA “Maintenance of Effort” waiver?
A. There is no waiver for FY 2010. To qualify for the next fiscal year (2011), the school system must meet all compliance targets in the State Performance Plan.

Q. Are we allowed to use ARRA funds to defray some of the IDEA-related salaries and other expenses currently paid out of the general fund? How will this affect “Maintenance of Effort” for IDEA?
A. You are allowed to use ARRA funds to defray some of the IDEA-related salaries and other expenses currently paid out of the general fund as long as the school system continues to maintain maintenance of effort. If it does not maintain MOE, it will be supplanting.

Q. If we use IDEA ARRA funds to purchase assistive technology, will we be allowed to run a more self-contained program?
A. IDEA requires the availability of a continuum of educational environments for students with disabilities. A self-contained program is allowable if it is needed by a student and the environment is the least restrictive environment for that student.

Q. Can the use of ARRA funds for graduation coaches (for non-Title schools, Grades 4-8) be expanded to Grades 9-12?
A. No. Title I ARRA funds may only be used in Title I schools.

Q. Can ARRA Title I funds be used to pay the salaries of nurses and subject-specific coaches already serving in Title I schools?
A. Federal funds may be used to supplement state and local efforts. Board action must be taken in order to fund positions with federal funds that were previously funded with state and/or local fund sources that are no longer available due to the precipitous decline in the economy. The action of the board is not to eliminate the position, but to document that state/local funds are no longer available due to declining revenues. The funded position must be applicable to the Title I program and based on the current needs assessment. State Fiscal Stabilization Funds should be used first to fill in for lost funding. Systems must adhere to the fiscal issues guidance on comparability and supplement, not supplant. Systems may not fund nurses with Title I funds in Title I schools and state/local funds in non-Title I schools.

Q. Regarding “Maintenance of Effort” reductions: The example using the 17.2 teacher units in Slides 64-65 seems to show the local money may be reduced but the number of employees will not. This does not seem to reduce MOE. Could we have clarification on this subject?
A. The 17.2 teacher units in Slides 64-65 show the movement of teachers on local funds to federal IDEA ARRA funds in order to reduce MOE (local funds spent on special education) under the 50% reduction of MOE with new additional IDEA money. However, caution must be applied in the use of IDEA ARRA funds for personnel. Personnel paid through these funds will have to be absorbed through other funding streams after the IDEA ARRA funds are no longer available.

Q. Is it possible to use IDEA ARRA funds to pay tuition costs for all-inclusive teachers to become highly qualified or just those teaching special education?
A. IDEA ARRA funds should be used for special education personnel. Title II money can be used to pay for the tuition costs for general education teachers.

Q. In order to use ARRA funds, does a position have to be eliminated entirely (through board action) and then recreated and brought back?
A. Board action must be taken in order to fund positions with federal funds that were previously funded with state and/or local fund sources that are no longer available due to the precipitous decline in the economy. The action of the board is not to eliminate the position, but to document that state/local funds are no longer available due to declining revenues. The funded position must be applicable to the Title I program and based on the current needs assessment. Title I ARRA funds must follow the same procedures as Title I, Part A, funds (i.e., be part of the discussion of the LEA Advisory Committee, a decision of the school based on the needs assessment and part of the school-level advisory committee, be included in the LEA-approved CIP, and meet all the fiscal issues requirements).

Q. How long will “Maintenance of Effort” reductions last?
A. They will last until the LEA increases the level of special education expenditures, using state or local funds, on its own.
Q. Can we get more details on the use of ARRA funds for preschool?
A. There is no limit to the amount of Title I funds that may be used for preschool. Systems may support a preschool program as a districtwide initiative or funds may be allocated to schools for the support of preschool programs. As with any activity using federal funds, it should be based on a comprehensive needs assessment and must follow the same Title I guidelines (i.e., be part of the discussion of the LEA Advisory Committee, a decision of the school based on the needs assessment and part of the school-level advisory committee, be included in the LEA-approved CIP, and meet all the fiscal issues requirements).

Q. If we use ARRA funds to expand the availability and range of inclusive placement options for preschoolers with disabilities, will “Maintenance of Effort” kick in after two years?
A. No, the ARRA funds are federal funds.

Q. In reference to Slide 81, how will we be able to identify stabilization funds from that of our regular monthly financial transfer? Will it be listed separately?
A. They will have a special account code and will be listed as a separate supplemental OCE allocation that will be tracked separately. They will be listed separately on the system's allocation sheet as well as the monthly transaction report.

Q. How and on what are our IDEA ARRA funds to be used?
A. All IDEA ARRA funds are to be used to fund special education and related services for students with disabilities consistent with current IDEA, Part B, and Preschool statutory and regulatory requirements. The funds will provide an unprecedented opportunity for LEAs to implement innovative strategies to improve achievement of students with disabilities while stimulating the economy. Some possible funding options for improvement of the special education programs include:

- Hire needed special education teachers and teacher aides.
- Hire or contract the services of additional psychometrists.
- Hire behavioral coaches/specialists to implement school or districtwide Positive Behavioral Supports.
- Provide school or districtwide Positive Behavior Supports training.
- Purchase for students with disabilities intervention curricula and training aligned to core academic areas of reading, math, and science.
- Provide intensive districtwide professional development for teachers that focuses on scaling-up of innovative, evidence-based schoolwide strategies in reading, math, writing, and science, and positive behavioral supports to improve outcomes for students with disabilities.
- Obtain state-of-the-art assistive technology devices and the accompanying training.
- Invest in technology that assists students with disabilities to access the general education curriculum.
- Combine IDEA and Technology funds to provide innovative professional development opportunities.
- Expand the availability and range of inclusive placement options for preschoolers with disabilities.
- Hire transition coordinators/job coaches to work with employers in the community to develop job placement for youths with disabilities.
- Pay stipends for parents and students to attend Transition Conferences.
- Provide self-determination training for students with disabilities.
- Fund model transition sites within LEA.
- Fund general education teachers (who are teaching special education under the Special Alternative Certificate) while they earn special education certification at the Class A or Class AA level.
- Purchase universal screening and student progress monitoring tools for students with disabilities.
- Combine IDEA, Title, state, and local funds to provide substitutes and/or stipends for data meetings for selected faculty and staff to examine school data trends and develop improvement plans.
- Provide training in data analysis.
- Designate full-time/part-time dedicated data personnel (FTE dependent on size of LEA) with job description protecting time to avoid competing duties. Data personnel responsible for timely and accurate data collection and input on special education students.
- Train data personnel to ensure timely and accurate data input of special education data.
- Provide training for school staff on cultural competence and disproportionate representation.
- Increase effective parent involvement by providing parent training on topics such as: working with their children to ameliorate problem behaviors; understanding disability and how to assist their children with homework, reading and math; understanding how to be a partner with the school during the referral and evaluation process and beyond; and handling transition.
Q. How and on what our Title I, Part A ARRA funds to be used?
A. All Title I Part A ARRA funds are to be used to expand and support services for students participating in Title I programs. The funds will provide an unprecedented opportunity for LEAs and schools to implement innovative strategies to improve the achievement of economically disadvantaged students. Funding plans are developed based on the review of annual needs assessments by district advisory and school-level committees. Some possible funding options for improvement of the Title I program include:

- Support for additional Title I teachers statewide.
- Support for additional subject-specific coaches (reading and/or math).
- Support for additional school nurses, graduation coaches, school improvement specialists, and parental involvement resource specialists.
- Expansion of programs through preschool, afterschool, and summer school programs for at-risk students.
- Increase professional development for highly qualified teachers, including travel expenses, conference registrations, and release time for teachers.
- Purchase additional resources for closing achievement gaps in schools and districts in improvement, such as supplemental textbooks and educational materials.
- Provide enrichment, accelerated, and extended learning opportunities.
- Implement district and schoolwide reform efforts.
- Increase parent involvement in Title I schools.
- Increase service to non-public schools.
- Expansion of service to Title I eligible elementary, middle, and high schools.
- Investment in technologies to close the achievement gaps among student subgroups.
- Increase school leadership capacity through purchased services for principal coaches, teacher mentoring, and development of “grow your own” teacher leader programs.
- Support for additional personnel and resources to meet the needs of ELL students.