

# Statewide System of Support

## 2021-22 Regional Assistance Grant (RAG)

### Frequently Asked Questions (FAQ)

#### **Common Acronyms:**

CSI – Comprehensive Support and Improvement  
ATS – Additional Targeted Support  
RAG – Regional Assistance Grant  
ESEA – Elementary and Secondary Education Act  
SSoS – Statewide System of Support

TSI – Targeted Support and Improvement  
MDE – Michigan Department of Education  
TAG – Technical Assistance Grant  
ESSA – Every Student Succeeds Act  
USED – U.S. Department of Ed

#### **Office Roles and Responsibilities:**

**Q: What is the role of each of the following in the Statewide System of Support (SSoS) for CSI schools--whether the schools are Partnership or CSI Alt Ed schools: MDE Office of Partnership Districts, Office of Educational Supports (OES) staff, Calhoun ISD? Who is responsible for what aspect of SSoS, and to whom should we turn when we have questions?**

**Office of Partnership Districts** - Assigns liaisons to partnership districts; awards, manages, and monitors state aid section 21h funds; reviews performance against 18 and 36-month benchmarks and goals; ensures the next level of accountability is implemented when the 18 and/or 36-month goals are not met.

**OES Staff (Regional Assistance Grants "RAG")** - Review and approval of the RAG budgets; monitoring of the RAG at the ISD level; liaison for the Michigan Department of Education and the Calhoun ISD Consortium/Statewide Field Team.

**Calhoun ISD (Statewide Technical Assistance Grant "TAG")** - Provides statewide technical assistance and training on systems (the *Blueprint for Systemic Reconfiguration*). Supports and services are provided to any CSI, TSI, or ATS designated school (and their districts) at no cost by the Statewide Field Team.

#### **RAG Usage and Allowable Activities:**

**Q: Our ISD serves a district with multiple CSI-designated schools. Are there guidelines we should follow regarding the use of RAG funds for other schools in the district?**

A: Remaining RAG funds can be used to support school or district-level services for any TSI or ATS school in the district, provided the needs of the CSI schools have been met first. Schools within the District that were not identified as CSI, TSI, or ATS may only receive allowable district-wide services as determined on a case-by-case basis.

**Q: The identified schools are the primary focus, but what are the allowable RAG-funded activities for the other schools in the district?**

A: Allowable activities for non-designated schools within a district with designated schools are district-wide initiatives, such as MTSS, *Blueprint* work, and Early Literacy/ELL interventions. Clear evidence must be provided; such initiatives are serving all students district-wide. Please note requests for district-wide services that do not include CSI, TSI, or ATS designated schools will not be allowed.

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**Q: Should RAG funds be used for direct student services?**

A: Yes. Direct student services are the primary intent of the RAG. They are allowable if those services are tied to addressing an identified need or root cause of low achievement/identification status.

**Q: Can our district use RAG funds to hire coaching positions?**

A: Yes. Coaching positions are an allowable expense for RAG funds if the data supports the need for coaching as a root cause for the school identification. The MDE recommends that ISDs meet the MDE definition of a coach at the [MDE's Coach Definition website](#).

**Q: If we have a district that does not want to use the RAG for their designated schools, how do we document this?**

A: Districts can indicate on the District Signature Page that they are declining services; the ISD will submit the dated and signed signature page into NexSys, documenting the declining district's request.

**Q: As many of the districts are considering adding or expanding counseling/mentoring support, should Activity Logs be kept and sent to the ISD with all invoices requesting reimbursement for the service? How specific should these logs be? Is there any set expectation?**

A: Activity logs are no longer required, however, the ISD should follow general Title I rules referencing time and effort by using PARs/semi-annual certifications. If the counseling/mentoring services all fit under the same cost objective, then semi-annual certifications will suffice. Activity Logs would be considered a best practice.

**Q: If an activity was approved last year, do we need to request an approval again this year?**

A: Yes. Every grant cycle must be approved by the MDE in the NexSys platform. Per EDGAR, Federal regulations require annual approval. The MDE is only obligated to reimburse for activities that are approved in NexSys for that specific grant year.

**Q: Many CSI-designated Alternative HS programs rely on software programs for remediation. Can RAG funds be used to purchase software for students? Access to sites for teacher use and instructional support (i.e. Newsela for example)?**

A: Yes. RAG funds can be used to purchase software if the software is purchased outright as a one-time startup cost or if the software subscription is for the same one-year period as the current RAG cycle.

**Q: Can RAG funds be used to purchase administrative or staff subscriptions and memberships?**

A: Yes. However, such activities should be a secondary focus of the RAG. Subscriptions and memberships are an allowable expense for RAG funds if the data supports that the subscription or membership would contribute to an increase in student achievement and/or graduation rates. RAG can only reimburse for subscriptions and memberships during the current grant cycle. Multiple-year subscriptions and memberships budget line items requests must be pro-rated for the current grant cycle.

**Q: Can RAG funds be used to purchase laptops and computers?**

A: Yes. RAG funds can be used to purchase technology equipment if the data demonstrates a lack of materials or durable goods are a root cause of low achievement and the school's CSI designation. Such requests will be considered in the context of how these expenditures directly support students.

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**Q: Can the ISD provide teacher stipends with RAG funds?**

A: The MDE suggests two options for ISD payment of teacher/staff stipends.

- The District pays for teacher/staff time through wages/benefits and invoices the ISD for reimbursement - If the district pays for teacher time through salaries/benefits, then the ISD considers it "Payments Made to Other Michigan Schools" under function code 411 and object code "Other" 7000/8000.
- The ISD provides stipends for teacher/staff time using an IRS form 1099 process coded to the appropriate function code and under object code "Purchased Services" 3000/4000.

**Q: Can the ISD use RAG funds to purchase food for teachers and staff?**

A: No. RAG funds cannot be used to purchase food for teacher/staff meetings, professional development, or other teacher/staff activities.

**Q: Can the ISD use RAG funds to purchase food for students?**

A: No. RAG funds cannot be used to purchase food for students or student meetings. Food for students should be requested through the District's food service program/department.

**Q: Can the ISD use RAG funds to purchase food for parent/family/community engagement meetings?**

A: Yes. RAG funds can be used for reasonable requests for food and snacks for family/community engagement meetings.

**Q: Can the ISD use RAG funds to purchase gas cards for staff or students?**

A: Gas only cards can be purchased for student transportation to and from allowable RAG-funded activities. This is the only allowable use of gas cards or cash-equivalent gift cards.

**Q: Can RAG funds be used for dual enrollment fees for students attending CSI-designated high schools and the local community college?**

A: Yes. If the district can show that not attending a dual enrollment program is a root cause of CSI identification status as evidenced by data. However, the districts must first utilize any available funds under the Post-Secondary Enrollment Options Act.

**Q: What documentation is the ISD/ESA/RESA required to collect for RAG-funded positions?**

A: All RAG-funded positions must have a position description and time & effort documentation.

**Q: I submitted the position description for the ISD/ESA/RESA position. What about RAG-funded district-level positions?**

A: All RAG-funded positions must have a position description and time & effort documentation, which includes district-level positions paid for with RAG funds.

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**Q: Can RAG funds reimburse for teacher/staff wellness or self-help programs?**

A: No. Teacher/staff wellness or self-help interventions or activities are not allowable with Title I RAG funds. There could be circumstances in which such an expenditure – under a very limited and specifically defined intervention - may be allowed under Title II, Part A at the building level, but the request is outside the scope and purpose of the RAG.

**Q: Can RAG funds reimburse for student wellness or whole child activities?**

A: Case-by-case basis. Student wellness or whole child activities, that include field trips and career & Tech Ed (CTE) related activities, are very broad in nature and must be pre-approved by MDE.

**Q: Can we use RAG funds for out-of-state training/professional learning conferences?**

A: Yes. If it can be shown that there is no one in the state that can provide the same level of training. All out-of-state professional learning/training must be reasonable and pre-approved by the MDE. Such requests will be considered in the context of how these expenditures directly support students. Requests for out of state travel that do not demonstrate a clear connection to directly supporting students will not be allowed with RAG funds.

**Q: Why can we now use funds for other schools (not Title I) when we could not in the past?**

A: Under the No Child Left Behind Act (NCLB), legislation limited funds to just services for Title I-receiving schools. The reauthorized law (ESSA) now clearly states that RAG funds can be used for any CSI, TSI, or ATS designated school regardless of Title I recipient status.

**Q: What services does the RAG provide for Alternative High Schools?**

A: Alternative High Schools are provided services on the same basis as any other identified school. Supports and services must be tied to demonstrated need through data analysis/root cause analysis.

**Q: Who keeps the assets, equipment, and durable goods purchased with RAG funds?**

A: Assets, equipment, and durable goods purchased with RAG funds is the property of the identified school. If the equipment is no longer needed, then the purchases are moved to another (CSI, TSI, or ATS) identified school, or the disposal process.

**Q. Who keeps technology/equipment after a building closes or is no longer supported?**

2 CFR Part 200.313 (e) Equipment can be used by the designated school in the program or project for which it was acquired as long as it's needed, whether or not the project or program continues to be supported by federal funds. When it's no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a federal agency in the following order:

- (i) Activities under a Federal award from the Federal awarding agency which funded the original program or project, then
- (ii) Activities under Federal awards from other Federal awarding agencies. This includes consolidated equipment for information technology systems.

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**TSI and ATS-Designated Schools:**

**Q: If a district with CSI-designated schools wants to hire positions for non-instructional services, i.e., high school counselor, can that position provide services to TSI-designated schools?**

A: Yes. On a case-by-case basis, district data must support the lack of non-instructional services as a root cause for TSI designation. However, please remember CSI designated school needs must be met first before TSI and ATS designated schools are served.

**Q: If I invite TSI schools to a CSI-funded professional development, can the TSI schools receive stipends or sub costs, expenses, and materials?**

A: TSI/ATS designated schools can attend the professional development and RAG funds can be used for stipends and sub-teacher costs for TSI/ATS designated schools if CSI schools' needs have been met.

**Q: What is an Additional Targeted Support (ATS) school? How is an ATS school different from a TSI school?**

A: Schools identified for Targeted Support and Improvement (TSI) are those that have one or more underperforming student groups defined as performing in the bottom 25% within each applicable component. Schools identified for Additional Targeted Support (ATS) are those having one or more student groups with a subgroup index value at or below the lowest performing 5% of schools.

**Technical Assistance Grant (TAG):**

**Q: Who can take advantage of the TAG?**

- Staff from any CSI, TSI, or ATS designated School
- Any district staff supporting CSI, TSI or ATS designated Schools
- Any ISD/ESA staff supporting CSI, TSI or designated ATS Schools
- Supports and services are available by subscription fees for entities not supporting CSI, TSI or ATS designated Schools

**Q: Are non-designated schools eligible for TAG funded services?**

A: No.

**Q: How does a district or school receiving SSoS services know if they are eligible for Technical Assistance Grant (TAG) funded services?**

A: Any CSI, TSI, and ATS designated schools served in the 20-21 school year remain eligible for TAG services in 21-22 provided by the Calhoun Intermediate School District. This is due to the 2019-20 assessment waiver granted to MDE by the U.S. Department of Education.

**Carryover Funds:**

**Q: When will our ISD know how much our carryover will be for the current RAG cycle?**

A: Carryover is calculated when the ISD files the Final Expenditure Report (FER) which is due by November 29th annually. Carryover is typically available by mid-January.

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**Q: Can we use new funding for sustainability/released schools?**

A: No. You can only use carryover funds for released schools for a period of one year.

**Service Plans:**

**Q: Is a service plan required for the TSI schools?**

A: Yes. TSI designated schools must be included in the RAG District Service Plan if you intend to use any RAG funds after CSI designated schools' needs are met or carryover funds are available to support those schools.

**Implementation Facilitator (IF):**

**Q: If there is a Partnership District that has identified CSI schools, does that district still need an Implementation Facilitator?**

A: No. Implementation Facilitators are optional for all RAG supported schools and districts.

**Q: Does the MDE have specific expectations for the Implementation Facilitator?**

A: Yes. An [Implementation Facilitator position description](#) is available through the MDE's website and is embedded in the service plan.

**State Law 21h:**

**Q: Partnership districts are eligible for funding under Section 21h of the state school aid act, P.A. of 1979. A district assigned to a partnership by the superintendent is eligible for funding under this section if the district includes at least one school that has been named a CSI school in the state accountability system rating. What is 21h funding for?**

A: 21h is state funding for CSI schools that goes directly to the district. The Office of Partnership Districts oversees these funds. Districts must apply for 21h funding and have a plan to show how the funds will be used in conjunction with other dollars to improve student achievement and exit CSI status. More information can be found at the MDE's [Partnership District website](#).

**School Designation Exit Criteria:**

**Q: How is the exit criteria determined for the newly identified CSI and TSI schools?**

A: Exit from CSI status only occurs in three-year intervals in conjunction with the identification of CSI schools. The next identification cycle and the first exiting of CSI schools will occur after the 2022 spring state assessments due to the 19-20 assessment waiver from the U.S. Department of Education. The exit criteria as defined in [Michigan's Consolidated State Plan Under the Every Student Succeeds Act](#) (approved November, 2017) is that the school is no longer identified by the system as a Comprehensive Support School (CSI) in no more than four years, and has demonstrated improvement in math and ELA proficiency rates over two years. The local school district determines the exit criteria for the TSI-designated schools.