

ESSU/Grants Fiscal Joint Training

## Special Education Program Breakout Session

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Exceptional Student Services Unit  
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## Federal Application Narrative Process

- 3-year cycle
- "New and improved" application process initiated 2013 for first 1/3 of the state
- Second 1/3 of the state coming in 2014-15
- Last 1/3 of the state coming in 2015-16
  - Encourage anyone who wants to amend to use new form
- Narrative must be substantially approved to request budget
- Narrative due June 1, 2014 with 2 amendment windows built in (October 2014 and March 2015)
- Performance Reports due July 1, 2014 – must be completed on an annual basis

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## Allowable Uses

Any individual charged to a federal grant must keep time and effort reporting whether or not it is a semi-annual certification or monthly personnel activity report (PAR).

Semi-annual certification is completed by those individuals who have a single cost objective.

Monthly PARs are completed by individuals who have multiple cost objectives. Under IDEA, any individual who is not providing 100% of their time to special education would need to complete monthly PARs.

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### Allowable Uses

- For a particular cost to be allowed, it must be an **excess cost of providing special education and related services**. Only allowable costs may be charged to IDEA Part B or Preschool Federal Funds.
  
- When determining whether a cost is an excess cost, ask the following questions:

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### Allowable Uses

- In the absence of special education needs, would this cost exist? If the answer is...
  - YES – the cost is not allowed
  - NO – the cost may be allowed
- Is this cost also generated by students without disabilities? If the answer is...
  - YES – the cost is not allowed
  - NO – the cost MAY be allowed
- If it is a child specific service, is the service documented in the student's IEP (i.e., assistive technology device)? If the answer is...
  - YES – the cost MAY be allowed
  - NO – the cost MAY NOT be allowed

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### Allowable Uses

- For a particular cost to be allowed, it also must be **NECESSARY** and **REASONABLE**.
  - A cost is necessary if it is specific to programming for students with disabilities.
  
  - A cost is reasonable if it does not exceed what a district would normally incur in the absence of federal funds.

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### Excess Cost v Tuition Cost for Facilities Schools

- Term " Excess Cost" is in regulations 34 CFR § 300.202(3)(b)
- Excess cost requirement under this regulation is an actual calculation that each AU is to perform
- Term has been misused to mean tuition cost rate set for facility schools
- The language in the ECEA Rules has been changed to tuition cost to avoid confusion

So, when using the term "excess cost", ask is this in regards to facility schools or is this specific to the excess costs calculation requirement in IDEA

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### Fiscal Monitoring Process

## Results Driven Accountability: Overview of Colorado's Continuous Improvement Process

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### Rationale

- Across the country, stakeholders were gathering to "reinvent special education"
- Collective protest against a compliance-based system of accountability
- Desire to place the emphasis on student outcomes
- Policy shift by OSEP

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## Fiscal Implications

- **Fiscal Compliance -**
  - What has OSEP said?
  - Some IDEA fiscal requirements are in statute
    - Excess Cost 34 CFR §300.202
    - MoE 34 CFR §300.203
  - Federal funds will continue to be audited by the Office of the Inspector General
  - Program indicators have been monitored, fiscal was just gearing up when OSEP put site monitoring on hold
  - Self-audit will be updated when the U.S. Department of Education issues its new General Administrative Regulations (EDGAR) for the new Omni-Circular

10 - is not going away

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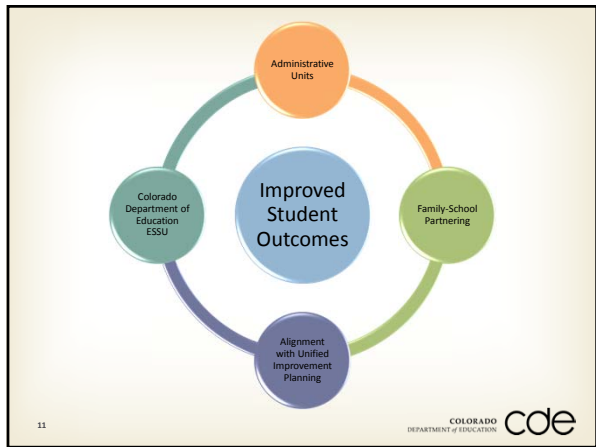
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**Unified Improvement Planning**

- Local Unified Improvement Planning
- Subgroup analyses
- Students on IEPs
- Alignment & blending of improvement planning for students with disabilities

**AUs' Special Education Leadership**

- Data analyses
- Identification of priority performance challenges
- Improvement activities and progress monitoring
- Self-audits for compliance, with inter-rater reliability checks

**Partnership with ESSU**

- Tiered system of support
- Increasing support with increased need
- Multi-year support
- Primary focus on outcomes
- Secondary focus on compliance

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### Tiered Support from the ESSU

Increasing support from ESSU & enlisted support from AUs that are accelerating growth

Intensive  
Targeted  
Universal

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### Timeline

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Questions?

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