### **Common Acronyms:**

CSI – Comprehensive Support and Improvement

ATS - Additional Targeted Support

ESSA - Every Student Succeeds Act

TSI – Targeted Support and Improvement MDE – Michigan Department of Education

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

### Q: Our ISD/ESA/RESA 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 ATS/TSI school in the district, provided the needs of the CSI designated schools have been met first. Schools within the district that were not identified as CSI, ATS, or TSI 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, systems work, Social Emotional Learning (SEL), and Early Literacy/English Language Learners (ELL) interventions. Clear evidence must be provided that all students are being served district wide. Please note requests for district-wide services that do not include CSI, ATS, or TSI designated schools will not be allowed.

#### O: 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/low graduation rate/CSI 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's identification. The MDE recommends that ISD/ESA/RESAs meet the MDE definition of a coach.

### 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/ESA/RESA 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/ESA/RESA 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/ESA/RESA 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. The Education Department General Administrative Regulations (EDGAR) requires 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 High School programs rely on software programs for remediation. Can RAG funds be used to purchase software for students? Or access to sites for teacher use and instructional support?

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. Software subscriptions must be pro-rated for the current grant 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 membership budget line-item 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/low graduation rate/CSI identification status. Such requests will be considered in the context of how these expenditures directly support students.

#### Q: Can the ISD/ESA/RESA provide teacher stipends or additional hours with RAG funds?

A: Yes, ISD/ESA/RESAs can pay teacher/staff stipends or additional hours with RAG funds. Stipends are payments for hours worked outside a regular contract that do not include taxes and benefits. Additional hours include both salary and benefits.

### Q: Can the ISD/ESA/RESA use RAG funds to purchase food?

A: RAG funds can only be used for reasonable requests for food and snacks for family/community engagement meetings consistent with Title I rules. No other food expenditures are allowed.

#### Q: Can the ISD/ESA/RESA 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 of any kind.

### 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 low achievement/low graduation rate/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: The ISD/ESA/RESA must submit assurance documentation from the district ensuring that each RAG-funded district-level position has appropriate placement, certification, and background checks.

### 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: On 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 in-state opportunity that provides 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 as well as how the learning will be shared with the district. Requests that do not meet these criteria will not be allowed with RAG funds.

#### O: Why can we now use funds for non-Title I identified schools when we could not in the past?

A: Under the No Child Left Behind Act (NCLB), legislation limited funds to services only for Title I-receiving schools. The reauthorized law (ESSA) now clearly states that RAG funds can be used for any CSI, ATS, or TSI 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 or if the building closes, then the purchases are moved to another CSI, ATS, or TSI identified school. If not needed at that identified school, the equipment can go to another Title I recipient school. If not needed there, the assets go through the disposal process. For all assets, it is crucial to document where they are being used.



### **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 ATS/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 low achievement/low graduation rate/ATS/TSI designation. However, please remember CSI designated schools' needs must be met first before ATS/TSI designated schools are served.

Q: If I invite ATS/TSI designated schools to a professional learning event intended for CSI designated schools, can the ATS/TSI designated schools receive stipends, additional hours, substitute teacher costs, expenses, and materials?

A: RAG funds can be used for stipends, additional hours, substitute teacher costs, expenses, and materials for ATS/TSI designated schools if CSI schools' needs have been met.

### **Carryover Funds:**

### Q: When will our ISD/ESA/RESA know how much our carryover will be for the current RAG cycle?

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

### 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:**

#### O: Does the district service plan need to reflect the district level budget line items?

A: Yes. The district service plan must reflect the district level budget and be updated if any amendments/modifications are made to the initial budget.

### Q: Is a service plan required for the ATS/TSI designated schools?

A: Yes. ATS/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 CSI designated 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.

