



Coordinated Early Intervening Services: Fiscal Requirements

LEA Training

Presenter(s)



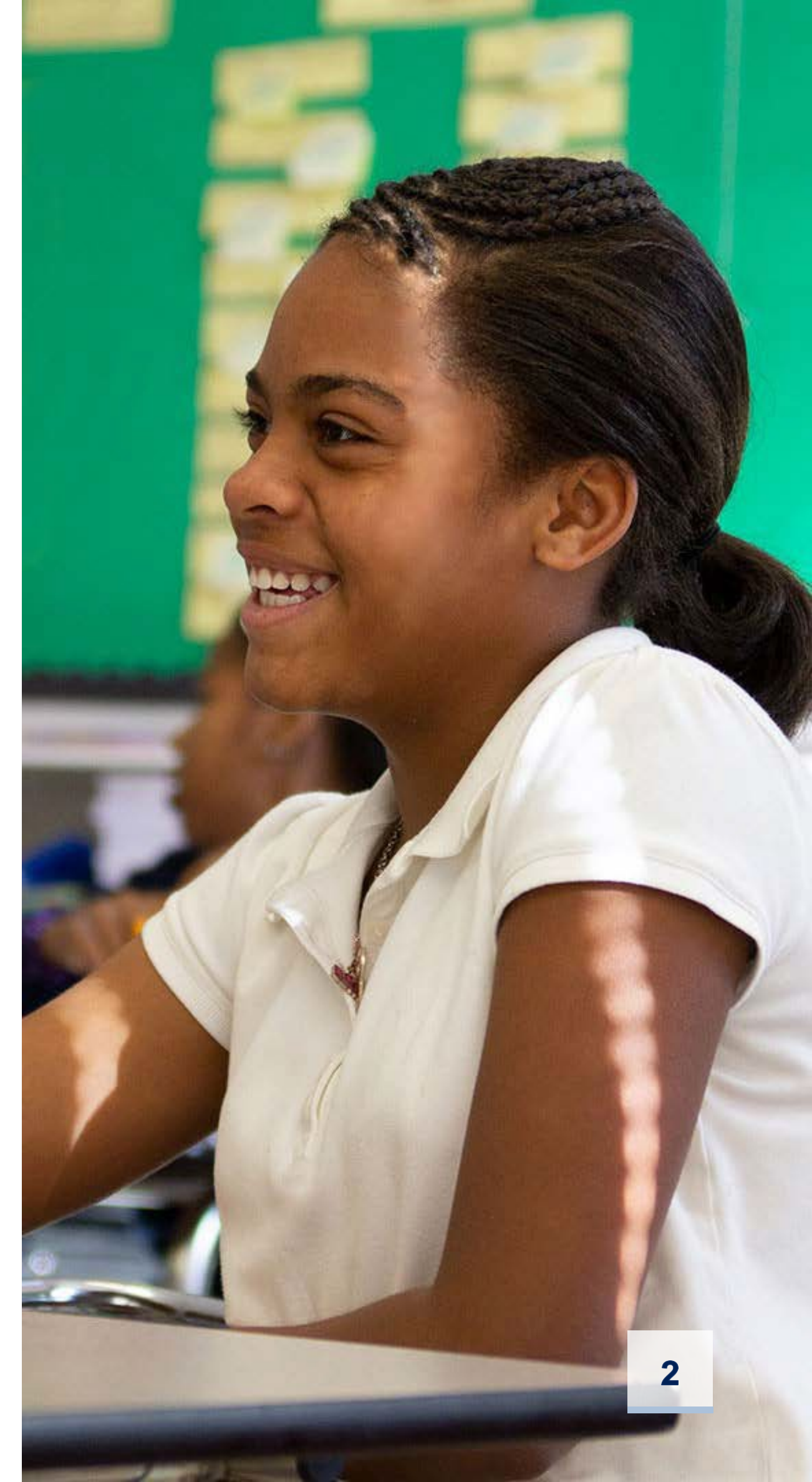
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Session Objectives

1. Increase district capacity to meet fiscal requirements related to Voluntary Coordinated Early Intervening Services (CEIS) and Mandatory Comprehensive Coordinated Early Intervening Services (CCEIS)
2. Increase knowledge of state-specific requirements
3. Identify allowable and nonallowable expenditures
4. Locate resources available to help ensure compliance with CEIS/CCEIS requirements



Agenda

- Coordinated Early Intervening Services Overview
- Comparison of Voluntary CEIS and Mandatory CCEIS
- State Requirements
- Interaction of CEIS/CCEIS and LEA MOE
- Calculation of CEIS Amounts
- Allowable Use of Funds
- Demonstration: CEIS Fiscal and Student Data Tracker
- Common Questions

Question

Please rate your knowledge of Voluntary Coordinated Early Intervening Services (CEIS) and Mandatory Comprehensive Coordinated Early Intervening Services (CCEIS) fiscal requirements under IDEA?

- a. Very strong
- b. Strong
- c. Fair
- d. Weak

Introduction

What are Coordinated Early Intervening Services?

What are Coordinated Early Intervening Services?

- Services to help children who need additional academic or behavioral support to be successful in school
- Can include professional development and educational and behavioral evaluations, services and supports (34 CFR §300.226(b); 34 CFR §300.646(d)(1)(i))
- May be voluntary (34 CFR §300.226) or mandatory (34 CFR §300.646(d))

Why are these services important?

- Identifying and addressing learning and behavior difficulties early
- Delays in providing support could result in a need for increased services at a greater cost
- May help to prevent inappropriate overidentification of particular subgroups of children with disabilities

Who can benefit from these services?

Voluntary CEIS

34 CFR §300.226(a)

Children *without* a disability in grades K–12, with a particular emphasis on students in kindergarten through grade three

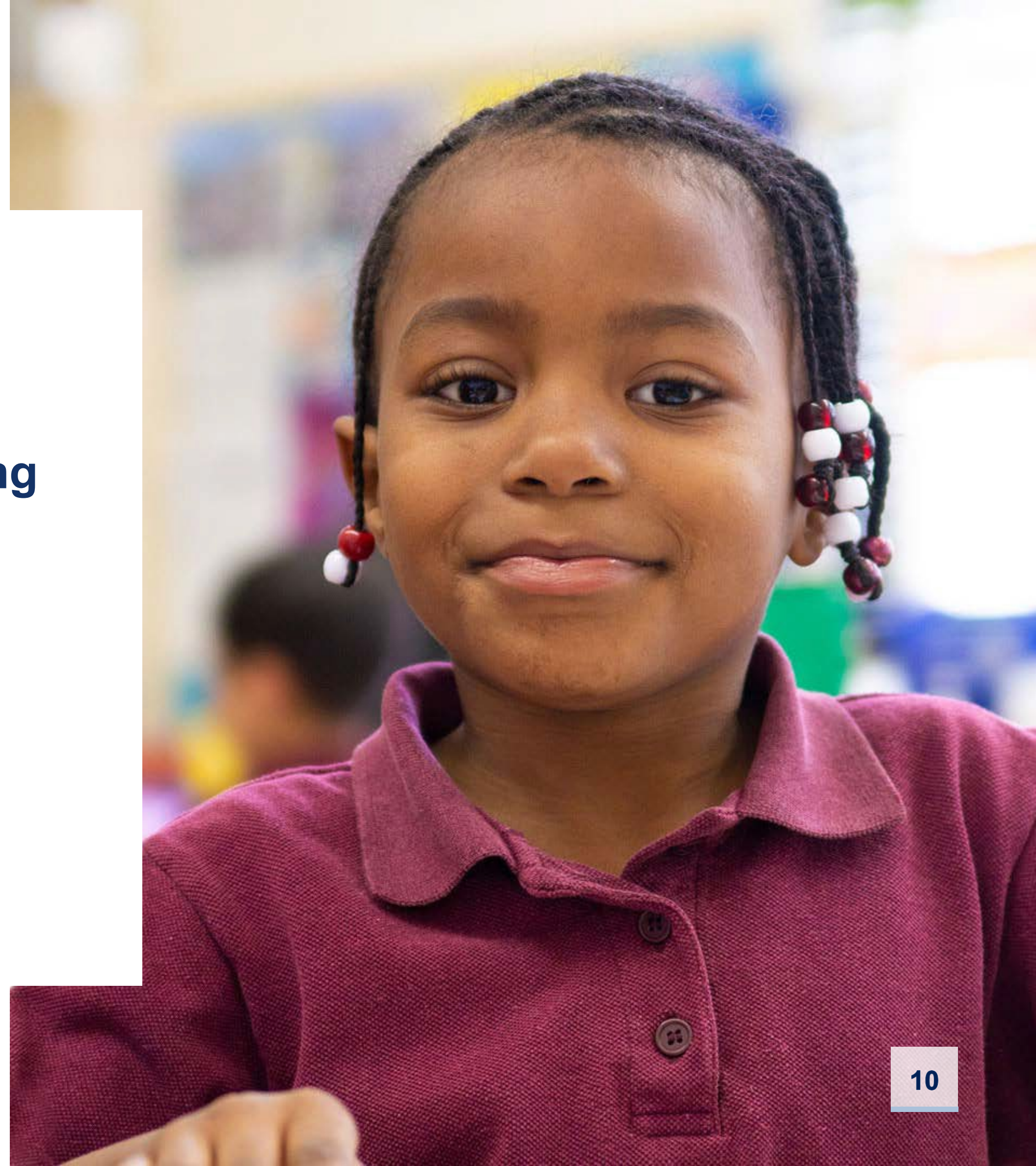
Mandatory CCEIS 34 CFR §300.646(d)(2)

Children *with or without* disabilities age 3 through grade 12, particularly, but not exclusively, children in those groups who were significantly overidentified

Question cont. (1)

How many types of coordinated intervening services are defined under the Individuals with Disabilities Education Act?

- a. 1
- b. 2
- c. 3



Voluntary CEIS and Mandatory CCEIS

A Comparison

Voluntary and Comprehensive CEIS

Voluntary CEIS

- 34 CFR 300.226
- Triggered by student need for academic and behavioral support
- May reserve up to 15% of Section 611 and 619 funds
- Grades K – 12 only
- Students not yet identified

Mandatory CCEIS

- 34 CFR 300.646
- Triggered by significant disproportionality determination
- Must reserve exactly 15% of Section 611 and 619 funds
- Age 3 – grade 12
- Identified and nonidentified

Permitted Activities: Voluntary CEIS

- Professional development for teachers and other school staff
- Educational and behavioral evaluations, services, and supports, including scientifically-based literacy instruction

Permitted Activities: Mandatory CCEIS

- Professional development and educational and behavioral evaluations, services, and supports

In addition, these LEAs must also:

- Address the factors contributing to the significant disproportionality (34 CFR §300.646 (d)(1)(ii)); and
- Address a policy, practice, or procedure identified by the LEA as contributing to the significant disproportionality (34 CFR §300.646 (d)(1)(iii)).

Reporting Requirements

Voluntary CEIS

An LEA is required to annually report to the state:

- the number of children served under this section who received early intervening services; and
- the number of children served under this section who received early intervening services and subsequently received special education and related services under Part B of IDEA during the preceding 2-year period.

Mandatory CCEIS

An LEA is required to publicly report:

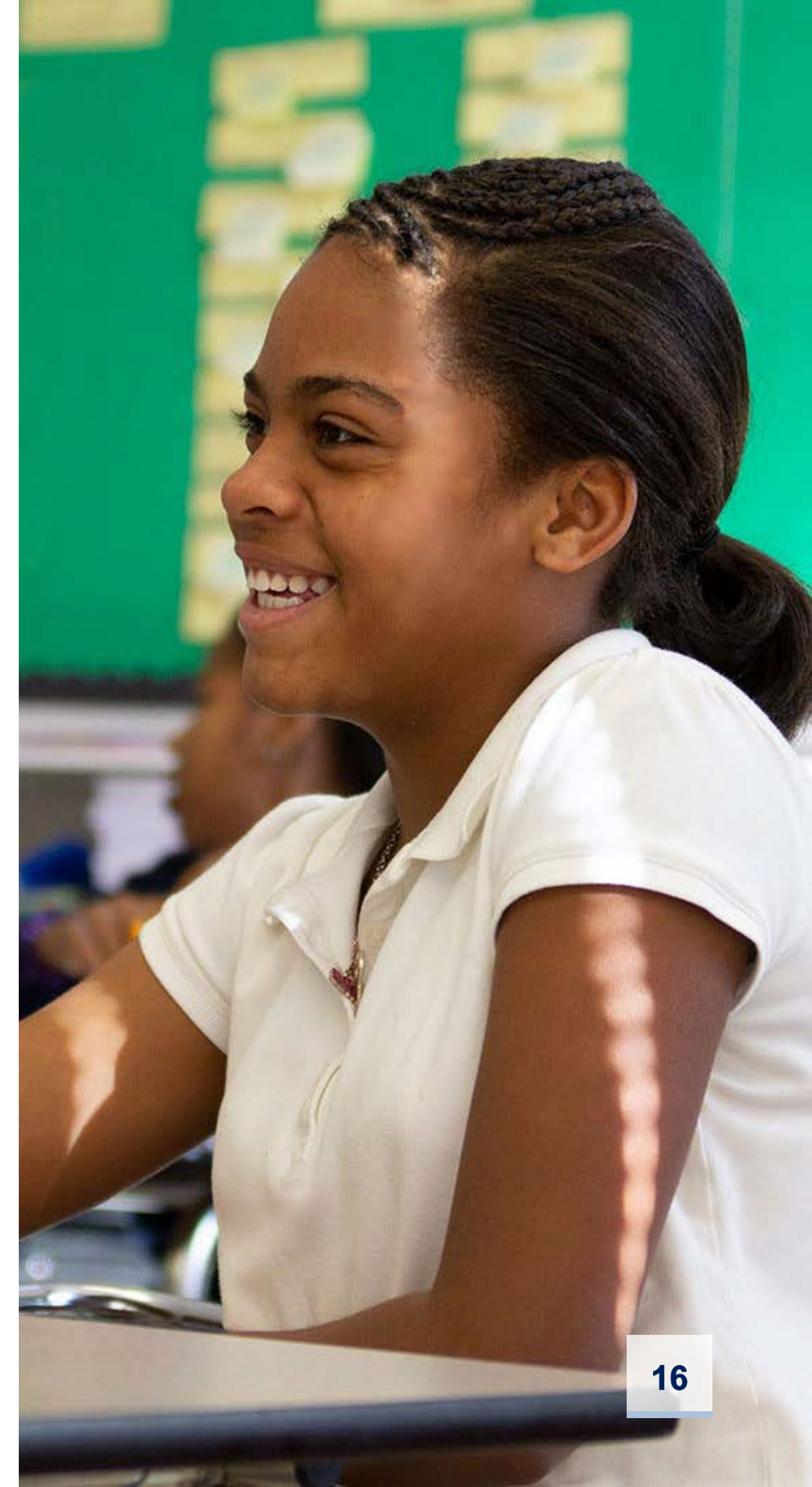
- the revision of policies, practices, and procedures.
- Additional reporting requirements to be determined by OSEP at a future date.

IDEA Data Center (IDC) Comparison Resource

This chart outlines the differences between CEIS and CCEIS in these key elements:

- Grade level
- Ages
- Groups served
- Funds
- Permitted activities
- Reporting requirements

[LINK: https://ideadata.org/sites/default/files/media/documents/2017-09/idc ceis chart.pdf](https://ideadata.org/sites/default/files/media/documents/2017-09/idc_ceis_chart.pdf)



Question cont. (2)

An LEA implementing voluntary CEIS plans to use the reserved funds to provide professional development to its preschool teachers. Is this an appropriate use of funds reserved for voluntary CEIS?

- a. Yes
- b. No
- c. Maybe



Question cont. (3)

An LEA may use funds for Mandatory CCEIS for behavior interventions for children *with and without disabilities* in middle school, particularly, but not exclusively, children in groups who were significantly overidentified.

- a. True
- b. False
- c. Unsure



State-specific Requirements

Utah

CEIS and CCEIS – Utah Definitions

Voluntary CEIS is defined by the regulations at 34 CFR §300.226.

Voluntary CEIS may be provided to children without a disability in kindergarten (including four-year-old kindergarten students) through grade 12, with a particular emphasis on students in kindergarten through grade three.

Mandatory CCEIS is defined by regulations at 34 CFR §300.646(d).

Comprehensive CEIS may be provided to children with or without disabilities age 3 through grade 12, specifically, but not exclusively, children in those groups who were significantly overidentified. Comprehensive CEIS activities cannot be limited to only children with disabilities.

Voluntary CEIS - Application and Review Process

Steps	Actions
1	LEA fills out application page (mark yes to set aside CEIS funds)
2	LEA uploads CEIS plan form in Utah Grants
3	USBE SES Fiscal Manager reviews CEIS plan. The USBE SES Fiscal Manager returns the form to the LEA if funds were requested without a CEIS plan
4	USBE SES Fiscal Manager sends the CEIS plan to UPIPS Program Coordinator
5	UPIPS Program Coordinator reviews LEA determination report for CEIS eligibility
6	UPIPS Program Coordinator reviews the plan for appropriateness and compliance with 34 CFR §300.226
7	UPIPS Program Coordinator approves plan if activities are allowable under 34 CFR §300.226
8	USBE SES Fiscal Manager approves plan if the planned activities are allowable and funds will not be used to supplant existing funding
9	USBE SES Fiscal Manager checks that the LEA did not budget more than the maximum 15 percent allowed from IDEA Section 611, Section 619, or a combination of both

Mandatory CCEIS – Significant Disproportionality

Under federal regulation 34 CFR § 300.646, USBE is required to:

“...provide for the collection and examination of data to determine if significant disproportionality based on race and ethnicity is occurring in the State and the LEAs of the State with respect to—

- (1) The identification of children as children with disabilities, including the identification of children as children with disabilities in accordance with a particular impairment described in section 602(3) of the Act;
- (2) The placement in particular educational settings of these children; and
- (3) The incidence, duration, and type of disciplinary actions, including suspensions and expulsions.”

Mandatory CCEIS – Plans and Review Process

Steps	Actions
1	Submit the CCEIS plan to the UPIPS Coordinator for review.
2	The UPIPS Coordinator reviews the plan for appropriateness and compliance with 34 CFR §300.646.
3	The UPIPS Coordinator approves the CCEIS plan after deciding that activities follow provisions under 34 CFR §300.646. If activities are found not to be allowable, the UPIPS coordinate will contact the LEA for revisions.
4	The USBE SES Fiscal Manager approves the CCEIS budget if the planned activities are allowable, and funds will not be used to supplant existing funding. If budget line items are found not to be allowable or that funds will be used to supplant existing funding, the USBE SES Fiscal Manager will contact the LEA revisions.
5	The USBE SES Fiscal Manager manually checks that the LEA budgeted exactly 15 percent from IDEA Part B Section 611 and Section 619 funds.

Voluntary CEIS and Mandatory CCEIS - LEA CEIS Tracking

LEAs are required to use the LEA CEIS tracker to track and report student information and related expenditures to the USBE SES team. The report must include the following information:

- Number of students served in year 1;
- Students served in year 1 who subsequently received special education services in year 1;
- Students served in year 1 who subsequently received special education services in year 2;
and
- Comparison of the amount budgeted in the CEIS plan to the amount spent to date.

Voluntary CEIS and Mandatory CCEIS – Allocation Process

- 50% of CEIS funds available through Utah Grants when the LEA's application is approved.
- Remaining 50% of CEIS funds available when the final allocation amounts are determined

Voluntary CEIS and Mandatory CCEIS – Monitoring and Reimbursement of Funds

Each LEA that voluntarily sets aside funds for CEIS is monitored through the review of LEA reimbursement requests and a supplemental CEIS expenditures report.

The supplemental CEIS expenditure report must include:

- The year-to-date amount spent, and
- A comparison of the amount budgeted in the CCEIS plan to the amount spent to date.

Relationship Between CEIS and LEA Maintenance of Effort Reduction

Conditions for MOE Adjustment

- Use the freed-up local (or state and local) funds to carry out ESSA activities during the SFY in which the adjustment takes place.
- Receive a determination of “meets requirements” from the SEA for the SFY of the adjustment.
- Not have had action taken against it by the SEA under IDEA Section 616.
- Not have had the responsibility for providing FAPE taken away by the SEA.
- ***Not be determined to have significant disproportionality for the SFY of the adjustment.***

LEA MOE Adjustment and Voluntary Coordinated Early Intervening Services

A Word of Caution

LEAs that seek to adjust LEA MOE under 34 CFR §300.205 and use Part B funds for CEIS under 34 CFR §300.226 must do so with caution because these provisions interact.

Interaction of LEA MOE Adjustment and CEIS

The amount of funds used for CEIS affects the amount allowed for MOE adjustment.

Example

Exhibit 1. Example of interaction of an LEA's voluntary use of Part B funds for CEIS and the LEA MOE reduction amount

Funds received and amounts available for voluntary CEIS and LEA MOE reduction	Dollar amount
Prior federal fiscal year IDEA Section 611 funds received	\$1,000,000
Current federal fiscal year IDEA Section 611 funds received	\$1,400,000
Current federal fiscal year IDEA Section 619 funds received	\$100,000
Maximum amount available for voluntary CEIS (current 611 funds + current 619 funds) x 15 percent	\$225,000
Maximum amount available for LEA MOE reduction (current 611 funds – prior 611 funds) x 50 percent	\$200,000
Maximum combined amount available for voluntary CEIS set-aside funds and LEA MOE reduction (lesser of the maximum amount available for CEIS or the maximum amount available for LEA MOE reduction)	\$200,000

Center for IDEA Fiscal Reporting & IDEA Data Center. (2015). Quick reference guide on coordinated early intervening services. San Francisco, CA: WestEd.

LEA MOE Adjustment and CEIS

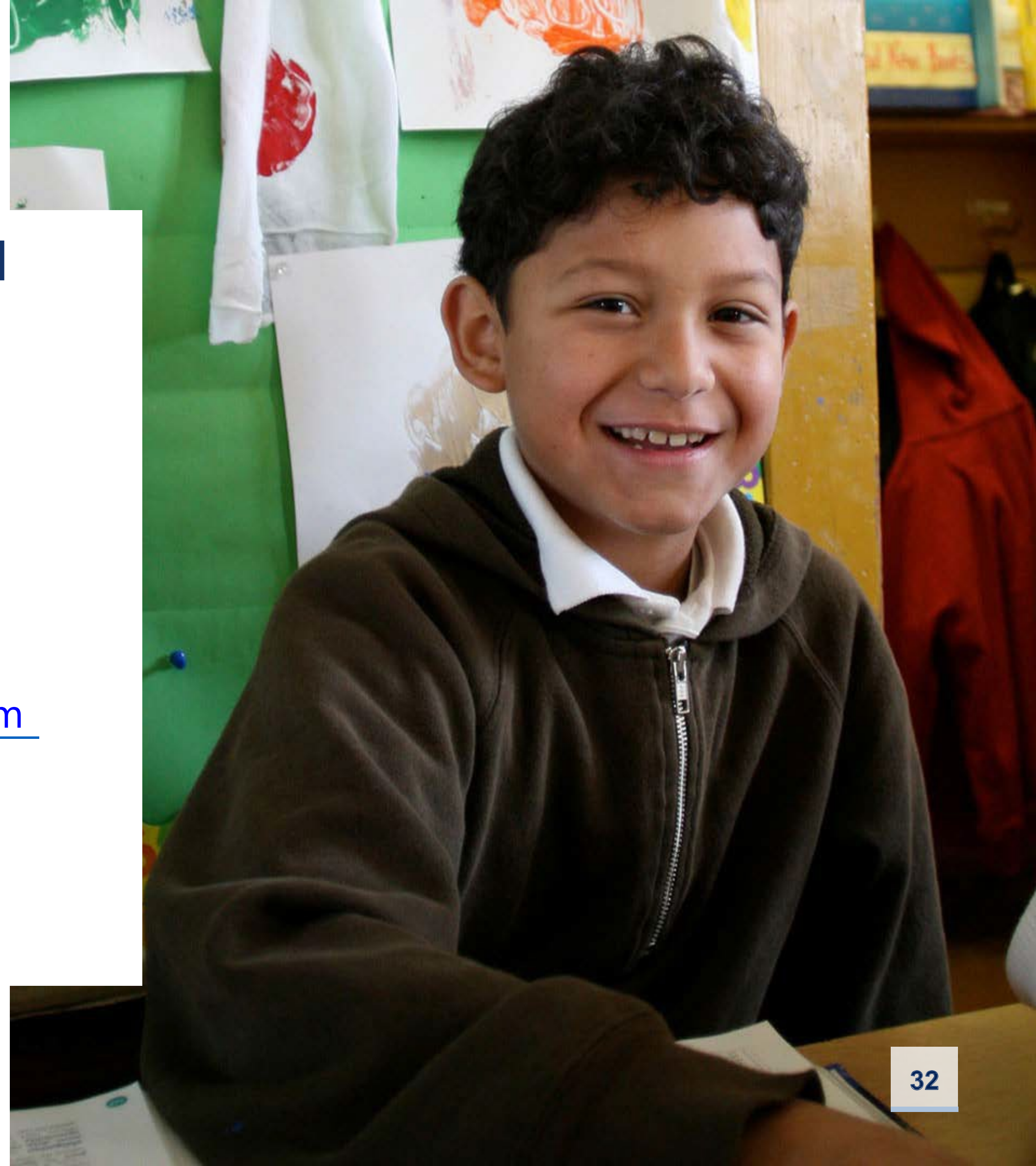
[Title 34 CFR §300.205 \(d\) https://www.ecfr.gov/cgi-bin/text-idx?SID=613a153487c7dcb91ab510ba77a8b8ab&mc=true&node=se34.2.300_1205&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=613a153487c7dcb91ab510ba77a8b8ab&mc=true&node=se34.2.300_1205&rgn=div8)

“Special rule. The amount of funds expended by an LEA for early intervening services under §300.226 shall count toward the maximum amount of expenditures that the LEA may reduce under paragraph (a) of **34 CFR §300.205** **https://www.ecfr.gov/cgi-bin/text-idx?SID=613a153487c7dcb91ab510ba77a8b8ab&mc=true&node=se34.2.300_1205&rgn=div8** section.”

IDC's MOE Reduction Eligibility and Decision Tree Worksheets

- Eligibility Decision Tree
- Calculation worksheet

LINK: <https://ideadata.org/resources/resource/1495/maintenance-of-effort-moe-reduction-eligibility-decision-tree>



Calculation of CEIS Amounts

Voluntary CEIS

Sunny Day School District wishes to voluntarily reserve funds for CEIS. The district will not reduce MOE. The district received \$1,400,000 IDEA section 611 funds and \$1,000,000 section 619 funds.

\$2,400,000 × **15%** = **\$360,000**

FFY 611 IDEA Funds + FFY 619 Funds × Maximum percentage allowed under IDEA = Maximum amount available to use for CEIS

Mandatory CCEIS

Snowy Day School District has been identified by the SEA as having significant disproportionality. The district received \$1,000,000 IDEA section 611 funds and \$400,000 section 619 funds.



Interaction of MOE Reduction and Voluntary CEIS

MOE Calculation				
Prior FFY 611 IDEA funds received	Current FFY 611 IDEA funds received	Increase in 611 IDEA funds	LEA may reduce its level of expenditure by up to 50% of any increase from the prior year to the current year's IDEA 611 funds	Maximum amount available for MOE reduction
1,000,000	1,400,000	400,000	Current FFY 611 IDEA funds – Prior FFY 611 IDEA funds x 50 percent $1,400,000 - 1,000,000 = 400,000 \times 50 \text{ percent}$	200,000
Voluntary CEIS Calculation				
Voluntary CEIS Calculation	FFY 619 IDEA funds received	Combined FFY 611 and 619 funds	LEA may voluntarily set aside up to 15% of combined 611 and 619 funds	Maximum amount available for voluntary CEIS
1,400,000	1,000,000	2,400,000	FFY 611 IDEA funds + FFY 619 IDEA funds x 15 percent $1,400,000 + 1,000,000 = 2,400,000 \times 15 \text{ percent}$	360,000

Snyder, L., Crain, D., Thacker, C., Nadkarni, S., and Long, T. (2018, March). Navigating Voluntary Coordinated Early Intervening Services (CEIS), (Version 2.0). IDEA Data Center. Rockville, MD: Westat.

Question cont. (4)

May an LEA reserve more than 15% of its IDEA Part B allocations (Section 611 and 619) for CEIS?

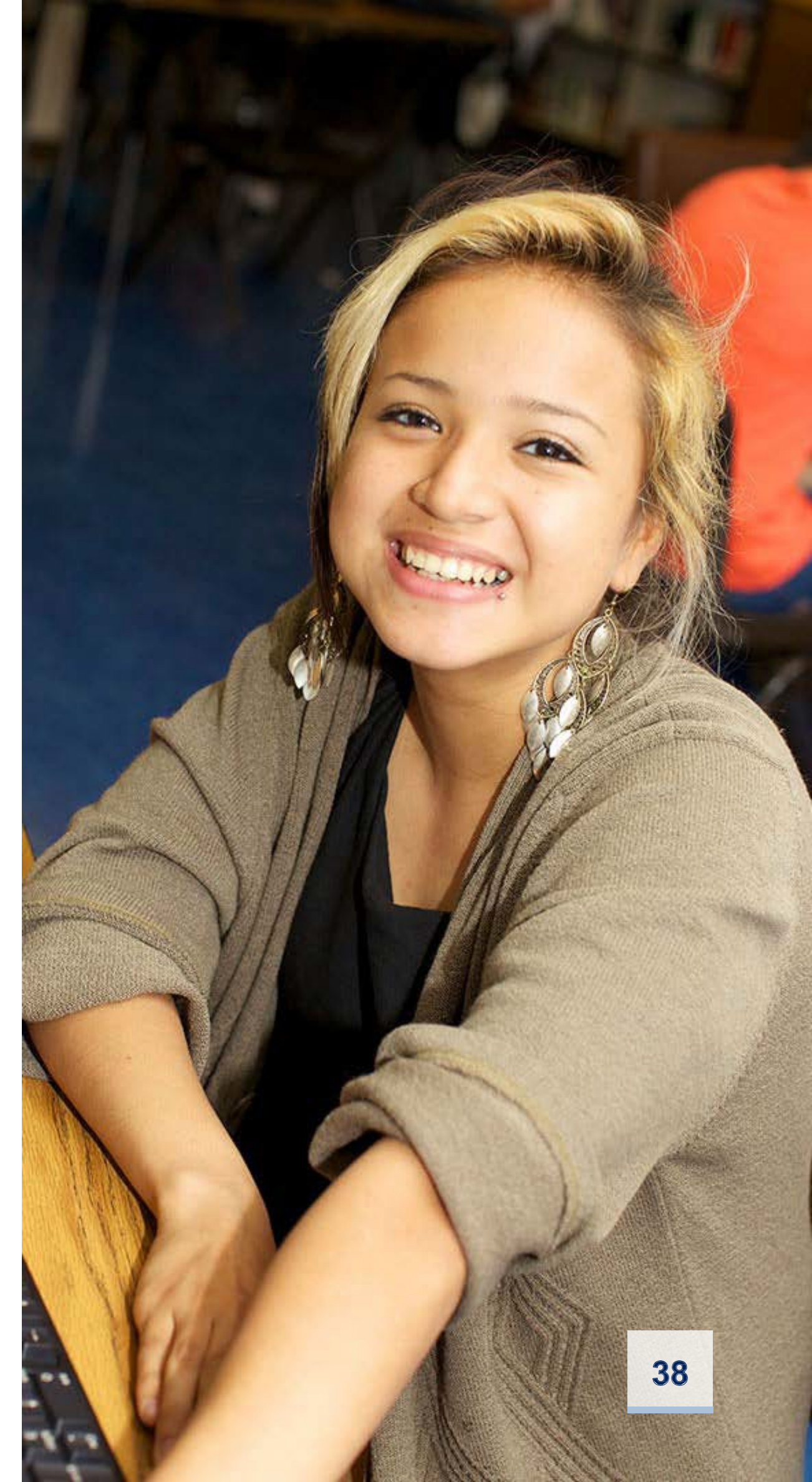
- a. Yes
- b. No
- c. Unsure



Question cont. (5)

An LEA that participates in voluntary CEIS must set aside exactly 15 percent of its total IDEA section 611 and 619 awards.

- a. True
- b. False
- c. Unsure



Allowable Use of Funds

Period of Availability

CEIS funds are available for the same period as IDEA funds.

LEAs have 27 months to obligate funding and 30 months to liquidate all obligations.

If an LEA voluntarily reserves CEIS funds, it may request the funds be made available for other allowable IDEA Part B purposes at any time during the period of availability.

LEAs who are required to set-aside CEIS funds are prohibited from using them for any other purpose. Therefore, when CEIS is required, those funds must remain reserved until the end of the period of availability.

Permitted Activities: Voluntary CEIS

- Professional development for teachers and other school staff
- Educational and behavioral evaluations, services, and supports, including scientifically-based literacy instruction

Permitted Activities: Mandatory CCEIS continued

- Professional development and educational and behavioral evaluations, services, and supports

In addition, these LEAs must also:

- Address the factors contributing to the significant disproportionality (34 CFR §300.646 (d)(1)(ii)); and
- Address a policy, practice, or procedure identified by the LEA as contributing to the significant disproportionality (34 CFR §300.646 (d)(1)(iii)).

Necessary, Reasonable, and Allocable

- **Necessary:** A cost is necessary if it is helpful and appropriate for your program or activities **IRS Definition Publication 535** <https://www.irs.gov/publications/p535>
- **Reasonable:** A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under similar circumstances.
- **Allocable:** A cost is allocable to a particular Federal award if the goods or services involved are chargeable or assignable to that Federal award in accordance with relative benefits received.

**Build Your
Knowledge**

Voluntary CEIS Scenario

Background

During planning for the 2017–18 school year, LEA staff reviewed data on math performance for kindergarten-through third-grade children in the LEA and found three groups of children who did not meet at least one of the four formative math assessment benchmarks the LEA monitored through progress monitoring throughout the 2016–17 school year:

1. Children who did not meet one or two benchmarks, did not qualify for any additional math interventions, and were not identified for special education and related services;
2. Children who did not meet three or four benchmarks, were not identified for special education and related services, and thus qualified for math intervention through the LEA's RTI tier two provided by trained aides during math group time; and
3. Children who did not meet one to four benchmarks but received special education and related services.

Identification

Target Intervention

The LEA will voluntarily use CEIS funds to provide professional development on scientifically based math interventions to all K–3 teachers at the beginning of the school year.

Target Student Group

The target group is the children in group (1) ***who did not meet one or two formative math assessment benchmarks and did not qualify for RTI math interventions or special education and related services.*** The 60 kindergarten-through-third-grade teachers who attended the training teach this group of children.

Student Tracking and Reporting

Tracking

The LEA should consider tracking only those children who are in the target group (did not meet math assessment benchmarks but did not receive RTI math interventions and were not identified for special education and related services) and received math interventions from the teachers who received CEIS-funded professional development.

Reporting

For CEIS reporting purposes, the LEA should not count children who did not need additional support or children who were eligible for and received the RTI or special education intervention (groups 2 and 3 above), even if they received math interventions from the teachers who received CEIS-funded professional development.

Planning and Budgeting Allowable Use of Funds

Based on planning, the LEA budgeted and expended 15% of its IDEA Section 611 and 619 Funds to provide professional development including the:

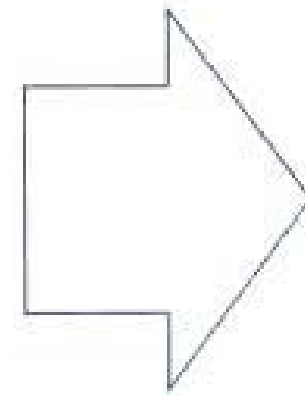
- Actual cost of the training;
- Supplies and materials for the training;
- Funds the LEA used to pay teachers to attend or pay for substitute teachers during the training; and
- Meeting space fees

Test Your Knowledge

CEIS/CCEIS Allowable Use of Funds

Supplemental Interventions

May CEIS/CCEIS funds be used to purchase supplemental interventions for a student determined to need this additional support to succeed in the general education program?

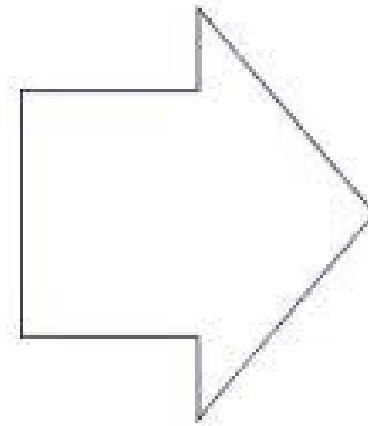


Allowed

CEIS/CCEIS funds **may be used to** fund supplemental academic and behavioral interventions for students determined to need additional academic and behavioral supports to succeed in general education.

Core Curriculum

May CEIS/CCEIS funds be used for the purchase of core curriculum?

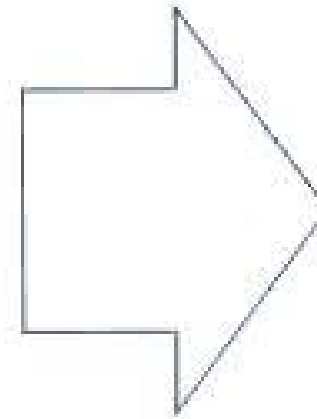


Not allowed

CEIS/CCEIS funds are not intended to be used for Core Curriculum.

Personnel

May CEIS/CCEIS funds be used to pay for the salary of a CEIS/CCEIS coordinator?

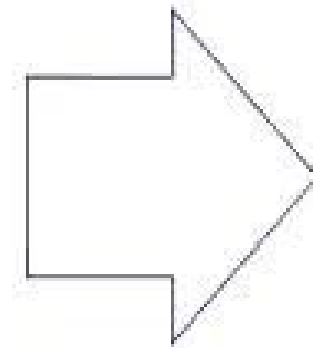


Allowed

CEIS/CCEIS funds may be used for salaries and fringe benefits, or portion thereof, for staff directly coordinating or supervising allowable CEIS/CCEIS activities.

Personnel cont.

May CEIS/CCEIS funds be used for the salary, or a portion thereof, of a school psychologist?

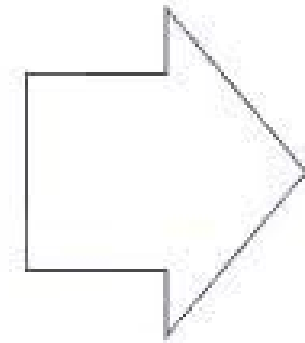


May be allowed

Allowable if costs include a school psychologist's efforts to implement behavioral interventions, progress monitoring, other CEIS/CCEIS evaluations, and related professional development.

After School Programming

May CEIS/CCEIS funds be used for after school programming?

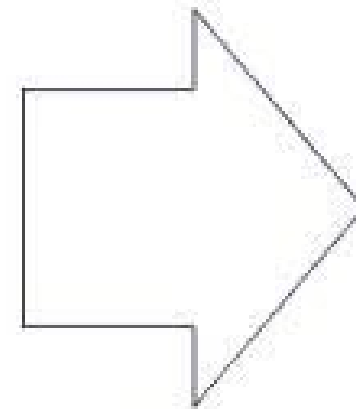


May be allowed

CEIS/CCEIS funds may be used to provide academic and behavioral interventions after school under certain circumstances. CEIS/CCEIS funds may NOT be used for after school programming available to all students.

Universal Screening

May CEIS/CCEIS funds be used for universal screening or assessment of all students in a grade, school, or LEA?

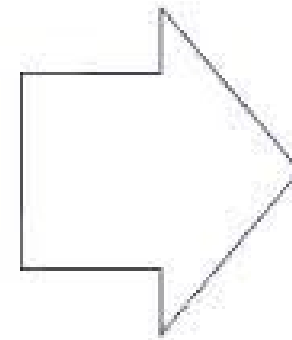


Not allowed

CEIS/CCEIS funds **may not** be used for universal screening or assessment administered to all students in a grade, school, or LEA.

Progress Monitoring

May CEIS/CCEIS funds be used for progress monitoring?



May be allowed

CEIS/CCEIS funds may be used for progress monitoring of supplemental interventions provided to those students determined to need additional academic and behavioral supports to succeed in general education.



Coordinated Early Intervening Services Fiscal and Student Data Tracker

Demonstration

CEIS Fiscal and Student Data Tracker Demonstration

The CEIS Fiscal and Student Data Tracker helps users collect data on the areas of significant disproportionality requiring CEIS spending, whether an LEA provided voluntary or comprehensive CEIS:

- amounts of IDEA funds reserved and expended,
- types of CEIS activity,
- students receiving CEIS, and
- if and when those students are found eligible for special education and related services.

<https://ideadata.org/resources/resource/1689/coordinated-early-intervening-services-ceis-fiscal-and-student-data-tracker>

Additional Resources

Additional Resources cont.

- [Quick Reference Guide on Coordinated Early Intervening Services:](https://cifr.wested.org/resource/quick-reference-guide-on-coordinated-early-intervening-services/)
<https://cifr.wested.org/resource/quick-reference-guide-on-coordinated-early-intervening-services/>
- CEIS Resources Step-by-Step: <https://cifr.wested.org/resources/ceis/ceis-step-by-step/>
- A Comparison of Mandatory CCEIS and Voluntary CEIS:
https://ideadata.org/sites/default/files/media/documents/2017-09/idc_ceis_chart.pdf
- OSEP Memo 08-09: Coordinated Early Intervening Services Under Part B of the IDEA:
<https://sites.ed.gov/idea/idea-files/osep-memo-08-09-coordinated-early-intervening-services/>
- For additional resources and information, visit:
 - CIFR website: <https://cifr.wested.org/>
 - IDEA Data Center (IDC) website: <https://ideadata.org/>

Opportunities for Individualized Support

WestEd offers the following support to LEA staff :

- One-on-One Coaching
- Review of Policies & Procedures
- Technical Support and Guidance

Question cont. (6)

How would you rate your knowledge of Coordinated Early Intervening Services (CEIS) and Comprehensive Coordinated Early Intervening Services (CCEIS) fiscal requirements under IDEA?

- a. Very strong
- b. Strong
- c. Fair
- d. Weak

Thank you

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