

(S-3) Title IA-Approved Comprehensive Support and Improvement (CSI) Assurances

As a pass-through entity for Federal education funds, the Maine Department of Education (Maine DOE) has prepared this guidance document to assist Federal program subrecipients in adhering to the statutory requirements for Title I, Part A Section 1003(e) and Section 1111(d)(2)(C).

The information provided in this document serves as general guidance provided by the Maine DOE. Subrecipients under Title I, Part A Section 1003(e) and Section 1111(d)(2)(C) should refer to the full text of the regulations which govern the use of these federal funds, which can be found under the Elementary and Secondary Education Act and within the [Code of Federal Regulations](#). Subrecipients of Federal funds are solely responsible for meeting all applicable Federal regulations.

Definitions:

Section 1003(e)-requires a School Administrative Unit (SAU) to align other Federal, State, and local resources to carry out the activities supports in CSI (school improvement) plans; to modify practices to provide operational flexibility that enables full and effective implementation of CSI (school improvement) plans; and to ensure that CSI identified schools receive all state, and local funds it would have received in absence of the allocated school improvement funds (SIG-Section 1003e)

Section 1111(d)(2)(C)- requires CSI school to identify resource inequities and to address the identified resources in inequities in their CSI (school improvement) plan.

Statutory Requirements:

Elementary and Secondary Education Act: Section 1003(e) and Section 1111(d)(2)(C)

State Guidance:

SAU must describe the process for how resource inequities were identified and addressed through the implementation of CSI (school improvement) plans.

SAU must describe the process for how other Federal, State and Local resources were aligned to carry out activities in CSI (school improvement) plans.

SAU must describe how SAU practices were modified to provide operational flexibility that enabled full and effective implementation of CSI (school improvement) plans.

SAU must describe how CSI identified schools received all eligible federal, state, and local funds.

Relevant Documentation:

To demonstrate having met the statutory requirements outlined above, the SAU may provide the Maine DOE with the following type(s) of documentation:

- Resource Allocation Review-See Next Page
- School Operational Flexibility
 - Policy waiver/modification records/ documentation demonstrating that the SAU (School Administrative Unit) modified practices (e.g., procurement rules, hiring schedules, or curriculum choices) specifically for the CSI identified school.
 - Flexible scheduling/staffing rosters/evidence of revised master schedules or modified staff ratios designed to support the CSI plan (school improvement plan).
 - "Flex" agreement/ minutes/ signed agreements or board meeting minutes showing that the district allowed the school to reallocate budget lines from non-critical areas to high-priority areas identified in the CSI Plan (school improvement plan)
- Evidence of Funding Receipt (Federal, State, Local)
 - District ledger/accounting records/financial reports, such as a Comprehensive Annual Financial Report (CAFR) or similar system, demonstrating that all allocated funds were directed to the school account.
 - Equitable distribution report/records indicating that local funds were distributed to the school without regard to MMSS identification status, adhering to "supplement, not supplant" requirements.
- Evidence of Resource Alignment
 - Budget alignment matrix document linking each major CSI (school improvement plan) strategy to specific funding sources (federal, state, or local).
 - Expenditure reports/ detailed reports showing that funds were spent on the interventions detailed in the CSI (school improvement) plan such as PD for teachers or specialized technology.

Technical Assistance:

Please feel free to contact the continuous school improvement coordinator at the Maine DOE if you have any questions related to the contents of this document or the requirements for leveraging these Federal funds.

Resource Allocation Review (RAR) Guidance and Template

ESSA Section 1111 (d)(2)(C) requires the identification of resource inequities for school identified for Additional Targeted Support and Improvement (ATSI) and Comprehensive Support and Improvement (CSI). This guidance and template can be used to help schools identify their resource inequities and determine next steps to address their identified resources inequities.

Purpose: Resource equity is the allocation and use of resources such as **people, time, and money** to ensure rigorous and empowering learning outcomes for **ALL** students. Conducting a resource equity review helps to identify, prioritize and address inequities

Factors to Consider*: Direct Impact and Indirect Impact on students

Direct Impact

- *Teaching Quality*-Ensure that students with greater needs have at least as much access to excellent teaching, if not more
- *Empowering, Rigorous Content*-All students have access to curriculum aligned with empowering, grade level standards
- *Instructional Time & Attention*-All students are held to a high standard as evidenced by their grades and state assessment scores
- *Early Intervention*-Early Intervention keeps students on track; more effective than trying to catch students back up once they have fallen behind
- *Early Learning*-Access to high-quality pre-K programs are among the most impactful strategies to improve student outcomes
- *Whole Child Approach*-Students need social, emotional, and academic development skills and competencies to participate in rigorous learning
- *Family Academic Engagement*-Parent/caregiver interest and involvement in their child's academic work can have profound effects on attendance, behavior, achievement, and graduation rates.

Indirect Impact

- *School Funding*-Extra dollars only matter when they are used well
- *School Leadership Quality*-School leaders impact the entire school
- *Diverse & Inclusive Schools*-Increase school diversity through student assignment, choice, or magnet policies
- *Learning Ready Facilities*- Leaders must weigh investing in new facilities along with other dimensions of resource equity

*Resource: The 10 Dimensions of Resource Equity published Alliance for Resource Equity
<https://educationresourceequity.org/dimensions-of-equity/>

Overview of RAR:

- Based on the resources outlined in the Resource Allocation Review, what resource inequities have emerged? Do the resources address the needs of the identified student populations?
- Are there additional resources and/or CSI (school improvement) plan revisions (goal, initiative, action steps) that are needed to address the needs of the identified student populations?
- How are identified resources being addressed in the CSI (school improvement) plan?

Direct Student Impact

List Discussion/Conversation Participants:

Date(s):	Identified Student Populations	Consideration of Core Instruction	Ideas to Address Inequity	Notes
Teaching Quality				
Empowering, Rigorous Content				
Instructional Time/Attention				
Positive School Climate				
Student Support/ Intervention				
High Quality Early Learning				
Family Academic Engagement				

Indirect Student Impact

List Discussion/Conversation Participants:

Date(s):	Identified Student Populations	Consideration of Core Instruction	Ideas to Address Inequity	Notes
School Funding				
School Leadership Quality				
Inclusive Schools				
Learning Ready Facilities				