









## II. CCSSO'S VISION FOR IMPROVING THE CONDITIONS FOR LEARNING

As set forth in *Leading for Equity*, schools cannot and should not try to displace families or faith communities as sources of value and character development. But schools must ensure that students have the opportunity to learn in environments that are conducive to developing the skills, habits, and dispositions that support student success in school and beyond. CCSSO believes that SEAs have a role in elevating the importance of conditions for learning, establishing important working relationships across state agencies and other organizations, and supporting local efforts.

More specifically, there are a number of actions that state chiefs should consider, as outlined in *Leading for Equity* and in Secretary Rivera's platform. These include:

- *Working with local education agencies (LEAs) to improve conditions for learning, including by addressing chronic absenteeism.* Schools with high rates of chronic absenteeism have lower academic achievement. SEAs can identify promising practices for reducing chronic absenteeism and connect LEAs with resources that have shown effectiveness in increasing attendance. For its part, CCSSO, in partnership with the organization Attendance Works, recently convened a meeting of states for the purposes of: (1) generating a deeper understanding of how the 36 states (and the District Of Columbia) that have included an absenteeism indicator in their Elementary and Secondary Education Act (ESEA) accountability system are measuring and using absenteeism data; and (2) developing strategies for how states can provide support to LEAs and schools on addressing chronic absenteeism, including causes rooted in food insecurity, physical health and wellness, mental health, and homelessness.
- *Revising exclusionary discipline policies and exploring alternative strategies.* States can revisit zero-tolerance discipline policies and examine alternative policies that provide positive behavioral interventions and supports (PBIS) and restorative justice. States can further provide LEAs with guidance, technical assistance, and funding to support implementation of these alternative strategies.
- *Advocating for the provision of state resources to support mental and physical health resources for schools with the greatest need.* SEAs can also establish partnerships with state health and mental health agencies so as to ensure that these supports are effectively targeted and efficiently delivered.
- *Provide incentives, competitive grants, or guidance to LEAs and local communities for the creation of community schools and other mechanisms for providing school-based comprehensive services to low-income communities and communities of color.* Much of this effort can be achieved through strategic partnerships with nonprofit social service providers and public agencies. Toward this end, CCSSO will identify successful examples of public schools engaged in successful partnerships with community partners and agencies to support the implementation of “whole child” school models.
- *Measuring and improving school culture as an important aspect of closing achievement gaps.* If they have quality evidence of need, schools can address issues of climate and culture that may exist in the classroom, including in schools with high proportions of students from low-income families and students of color. States can sponsor surveys of school climate and culture and lead initiatives to address the findings.

This potential menu of strategies fleshes out CCSSO's vision for SEA actions to improve the conditions for learning in a state. The next issue, then, is what federal funding sources could be tapped in putting together a conditions for learning action agenda in a state.

### III. FEDERAL FUNDING SOURCES THAT CAN BE TAPPED WHEN STATES AND LEAs DEVELOP STRATEGIES FOR IMPROVING THE CONDITIONS FOR LEARNING

#### 1. Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA)

ESEA Title I, Part A (“Title I”) provides supplemental funding for local programs that provide extra academic support to help students in high-poverty schools meet state academic achievement standards. Title I funds flow by formula from the U.S. Department of Education (USED) to states and then to LEAs. The LEAs then operate Title I programs in individual schools and may also reserve funds at the district level to provide services or carry out activities for all or a portion of their Title I schools. Currently, Title I is funded at approximately \$15.9 billion, and the program serves some 25 million children attending nearly 60 percent of all public schools.

Within an LEA, Title I funds generally flow to the schools with the highest percentages of children from low-income families. Once they reach a school, the funds support implementation of supplemental programs provided through one of two models: “schoolwide programs” and “targeted assistance programs.” Under either option, Title I funds may be used to improve the conditions for learning in a school, but subject to the statutory restrictions governing the model. We discuss the two models separately below.

##### Title I Schoolwide Programs

Under a schoolwide program, an eligible school may use its Title I funds to upgrade the educational program of the entire school, rather than having to serve only students who are failing or most at risk of failing to reach state academic standards and certain other eligible students. A school is eligible if it serves a student population of which at least 40 percent are students from low-income families. (States may also grant waivers to allow schools with a lower percentage to operate them.) In the 2014-2015 school year, some 83 percent of all Title I schools (serving 96 percent of participating students) implemented schoolwide programs.

In addition to allowing schools to carry out activities and provide services that benefit the whole school, the schoolwide programs authorization permits schools to consolidate funds from other federal formula programs into their schoolwide improvement efforts, without having to account for each funding source separately, so long as a school’s schoolwide program, considered as a whole, addresses the intent and purposes of each program consolidated.

In order to implement a schoolwide program, a school must develop, with the involvement of parents and other members of the community, a comprehensive plan that includes an assessment of the needs of children in the school and describes the strategies the school will carry out to provide opportunities for all children to meet the state’s standards. Notably, relative to conditions for learning, the statute specifies that those strategies may include (among other things):

- Counseling, school-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students’ skills outside the academic subject areas<sup>1</sup>; and
- Implementation of a schoolwide tiered model to prevent and address problem behavior, and early intervening services, coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act (IDEA).<sup>2</sup>

<sup>1</sup>ESEA Section 1114(b)(7)(A)(iii)(I)

<sup>2</sup>ESEA Section 1114(b)(7)(A)(iii)(III)



## But how are Title I funds actually used?

As the descriptions of the authorizations for schoolwide programs and targeted assistance programs indicate, both models are flexible enough to allow schools to address the conditions for learning as part of a strategy for raising the achievement of and improving other outcomes for educationally needy children. This is particularly the case with the more flexible schoolwide model.

Nevertheless, the available information indicates that few schools and districts have taken that path. More typically, schools have continued to fund traditional uses of Title I funding, particularly supplemental reading or math instruction, and they rarely appear to use the funds to address non-academic factors that affect student outcomes. A 2018 ED study of a nationally representative survey of schools<sup>8</sup> found that, in school year 2015-2016, 74 percent of schoolwide program schools and 55 percent of targeted assistance schools used Title I to fund reading instruction and 55 percent and 33 percent, respectively, used Title I to fund math instruction. The other commonly reported uses of funds were also instructional (e.g., instructional support for English learners or students with disabilities, extended learning time). Using Title I for activities related to conditions for learning was not one of the commonly reported activities. Moreover, only 6 percent of schoolwide program schools in the sample had consolidated Title I and other funds in order to support overall school improvement.

However, in case studies of 26 schoolwide program schools (undertaken as part of the larger study), the authors did find that a few of these schools had used their funds to address learning conditions. Specifically, four schools had used Title I to hire a guidance counselor or a school psychologist to address students' social-emotional and nonacademic needs. For example, the counselor at one elementary school focused on developing students' skills for social and academic success, and interviewees at the school credited this counselor with encouraging the use of Second Step, a research-based program to build social-emotional skills. Moreover, the counselor had organized a group of interns from a local college to work with the school's large Native American population to promote organizational and study skills and college readiness goals through culturally responsive instruction. In addition, two of the 26 schools used Title I to support schoolwide implementation of positive behavior interventions and supports (PBIS)<sup>9</sup>.

Similar case studies of nine targeted assistance schools did not find that these schools were using their Title I funds for non-academic, school climate-related activities.

These research results strongly suggest that Title I schools have not taken advantage of the authority provided under the statute (and the flexibility offered by the schoolwide programs authorization) to implement activities to address the conditions for learning.

Additional reports identified a few, but only a few, additional actual uses of Title I funds in a manner consistent with a focus on conditions for learning.

<sup>8</sup> U.S. Department of Education, *Study of Title I Schoolwide and Targeted Assistance Programs: Final Report, 2018* – <https://www2.ed.gov/rschstat/eval/title-i/schoolwide-program/report.pdf>

<sup>9</sup> Ibid



- A 2014 study released from George Washington University found that the Mary Todd Elementary School in Lexington, **Kentucky** had used its Title I funds (as part of a schoolwide program) to purchase Second Step. According to the study, the school subsequently experienced improved student behavior, increased academic performance, and higher teacher satisfaction<sup>10</sup>.
- A presentation by the Coalition for Community Schools (undated, but from approximately 2008) reported that 27 of **New Mexico's** school districts had used Title I funds to build school-community partnerships as part of the development of community schools. The presentation also noted community-schools-related Title I spending in Evansville, Indiana; Lincoln, Nebraska; Indianapolis, Indiana; and Multnomah County, Oregon, including expenditures in such areas as behavioral health therapy, social work, and family engagement<sup>11</sup>.

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## **2. Student Support and Academic Enrichment Grants (Title IV, Part A of the Elementary and Secondary Education Act)**

ESEA Title IV-A authorizes a program of grants to states and LEAs supporting efforts to provide all students with access to a well-rounded education, improve school conditions for student learning, and improve the use of technology in order to raise students' academic achievement and digital literacy. The program is funded at \$1.17 billion in fiscal year 2019.

Under Title IV-A, funds flow by formula from ED to the states, and then by formula (based on shares of funding under ESEA Title I-A) to LEAs. States also reserve up to 5 percent of their total allocations for administration (capped at 1 percent of the total) and for state-level activities. The statute specifically authorizes SEAs to use these state-level funds for the following types of activities supportive of efforts to improve the conditions for learning:

- Coordinating with LEAs that are implementing an evidence-based plan to reduce exclusionary discipline, with the long-term goal of prison reduction;
- Supporting LEAs in implementing health-awareness training programs that: (1) are evidence-based (to the extent that the SEA determines such evidence is reasonably available); and (2) provide education to school personnel regarding the resources available in the community for students with mental illness and on other resources related to mental health or the safe de-escalation of crisis situations involving a student with a mental illness;
- Supporting LEAs in expanding access to or coordinating resources for school-based counseling and mental health programs, such as through school-based mental health partnership programs;

<sup>10</sup> The Center for Health and Health Care in Schools and the Center on Education Policy, George Washington University, A Guide to Federal Education Programs that Can Fund K-12 Universal Prevention and Social and Emotional Learning Activities, May 2014 – [https://www.responsiveclassroom.org/sites/default/files/pdf\\_files/funding\\_federal\\_guide\\_SEL.pdf](https://www.responsiveclassroom.org/sites/default/files/pdf_files/funding_federal_guide_SEL.pdf)

<sup>11</sup> Coalition for Community Schools, Uses of Title I Funds for Parent Engagement and Community Schools – [http://www.communityschools.org/assets/1/AssetManager/Sarah\\_Pearson\\_Notes1.PDF](http://www.communityschools.org/assets/1/AssetManager/Sarah_Pearson_Notes1.PDF)



- Activities to prevent bullying and harassment;
- The improvement of instructional practices for developing relationship-building skills, such as effective communication;
- Activities that improve safety through the recognition and prevention of coercion, violence, or abuse;
- Providing mentoring and school counseling to all students, including children who are at risk of failure, dropping out of school, involvement in criminal or delinquent activities, experiencing homelessness, or drug use and abuse;
- Establishment of learning environments and enhancement of students' effective learning skills, such as by providing integrated systems of student and family supports;
- High-quality training for school personnel on (among other areas), effective and trauma-informed classroom management practices, crisis management and conflict resolution techniques, and identifying the unique needs of students experiencing homelessness, and drug abuse, violence, and suicide prevention;
- Child abuse awareness and prevention programs or activities;
- Locally tailored plans for reducing exclusionary discipline practices;
- Implementation of schoolwide PBIS; and
- Designating a site resource coordinator to establish partnerships with the community and strengthen school-community relationships<sup>14</sup>.

Note again that all of these are only examples of activities that LEAs may carry out under the program. Other strategies that are consistent with the statutory purposes may also be pursued.

### How are states using their state-level Title IV-A funds?

Student Support and Academic Enrichment Grants (Title IV-A) are clearly an important resource available to support state and local efforts to improve conditions for learning. Title IV-A is also a very new program, and there is currently very little information on how states have used, or are using, the program to support activities in this area.

With that caveat in mind, the following are examples of how states are making use of Title IV-A funds to support activities designed to improve conditions for learning, as gleaned from USED-approved ESSA state plans.

- **Louisiana** is using the program to support statewide activities associated with student behavior and discipline. Specifically, the Louisiana Department of Education (LDE) is supporting the state's Advisory Council on Student Behavior and Discipline, supervising regional consortia on positive behavior interventions and supports, and overseeing implementation of the state's comprehensive bullying and harassment laws. LDE staff are providing training and technical assistance to LEA and school officials on effective discipline practices that promote orderly and healthy school climates<sup>15</sup>.

<sup>14</sup> ESEA Section 4108(5)

<sup>15</sup> Louisiana ESSA plan – <https://www2.ed.gov/admins/lead/account/stateplan17/lastateplan882017.pdf>, pp. 95-96

- **Massachusetts** is using Title IV-A funds to increase staff time devoted to supporting social and emotional learning, health, and safety. This work builds on previous efforts in such areas as developing and refining a safe and supportive schools framework and self-assessment tool and carrying out a “Rethinking School Discipline” initiative<sup>16</sup>.
- **Alabama** is using a portion of its state-level funds to address behaviors identified through the state’s data collections. Activities being carried out include promoting strategies to reduce chronic absenteeism, as well as practices to prevent bullying and harassment<sup>17</sup>.
- **Alaska** is initially using its Title IV-A state funds to support school health and safety. The state is disproportionately affected by behavioral health and social challenges that negatively affect student health, behavior in the classroom, and learning (e.g., among the highest rates among the states of fetal alcohol syndrome, child abuse and neglect, and suicide). Alaska is thus using its Title IV-A funds to deliver face-to-face training and asynchronous distance-delivered e-learning training on health (including mental health) and safety topics to district personnel<sup>18</sup>.

### 3. Medicaid

Medicaid is a joint federal-state program that, together with the Children’s Health Insurance Program (CHIP), provides health coverage to over 73.5 million Americans, including children, pregnant women, parents, seniors, and individuals with disabilities. The program provides considerable state flexibility in setting policy with regard to eligibility, covered services, and how those services are reimbursed and delivered. In order to participate, however, states must cover certain groups of individuals; these “mandatory eligibility categories” include low-income families, qualified pregnant women and children, and individuals receiving Supplemental Security Income (SSI)<sup>19</sup>.

Medicaid pays for health and related services provided in schools when covered services are provided to Medicaid-enrolled children and adolescents, or when services are provided to a child through his or her individualized education plan (IEP) under the IDEA. (Most of the “related services” provided under IDEA, such as speech or physical therapy, are covered by Medicaid.) As part of the activities necessary to administer the Medicaid state plan, states may also provide Medicaid payments to schools for Medicaid outreach and enrollment activities, as well as other eligible, school-based administrative activities<sup>20</sup>.

Medicaid spending on school-based health-care and administrative services was some \$4.5 billion in fiscal year (FY) 2016. These expenditures have varied widely by state; for example in the 2016 fiscal year 12 states (not always the largest ones) each reported over \$100 million and three states reporting no expenditures<sup>21</sup>.

SEAs may wish to work with LEAs in the state to expand the use of Medicaid as source of funding for the health- and mental-health-related elements of a strategy for improving the conditions for learning. In doing so, however, they will need to be cognizant of the rules governing the eligibility of specific expenditures. In past years, a number of states have been required to reimburse the federal government for charging unallowable or incompletely documented costs. In brief, the requirements are as follows.

<sup>16</sup> Massachusetts ESSA plan – <https://www2.ed.gov/admins/lead/account/stateplan17/maconsolidatedstateplan.pdf> – pp. 91-92

<sup>17</sup> Alabama ESSA plan – <https://www2.ed.gov/admins/lead/account/stateplan17/alconsolidatedstateplanfinal.pdf> – pp.57-58

<sup>18</sup> Alaska ESSA plan – <https://www2.ed.gov/admins/lead/account/stateplan17/akconsolidatedstateplanfinal.pdf> – pp. 84-85

<sup>19</sup> <https://www.medicaid.gov/medicaid/eligibility/index.html>

<sup>20</sup> Medicaid and CHIP Payment and Access Commission (MACPAC), Medicaid in Schools, April 2018 – <https://www.macpac.gov/wp-content/uploads/2018/04/Medicaid-in-Schools.pdf>

<sup>21</sup>Ibid

## **School-based services for children with disabilities**

Since 1998, states have been authorized to use Medicaid to pay for school-based health and related services required under IDEA, when provided to Medicaid-eligible children with disabilities. These services must be needed for a child with a disability to receive a “free appropriate public education” under the law and, therefore, be specifically required in the child’s individualized education program (IEP) or, in the case of infants and toddlers, the individualized family service plan (IFSP).

Further, Medicaid may pay for services only if:

- The services are listed in Section 1905(a) of the Social Security Act and are medically necessary;
- All federal and state regulations are followed, including those specifying provider qualifications; and
- The services are included in the state’s Medicaid plan or are available through Medicaid’s Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) benefit.

Covered services may include, but are not limited to, physical therapy, occupational therapy, speech therapy, psychological counseling, nursing, and certain transportation services. Medicaid may also provide payment for evaluations needed to determine health-related needs for the purpose of an IEP or IFSP. The extent of these coverages will vary by state; SEA and LEA officials looking to expand the use of Medicaid will want to review the authorizations and limitations applicable in their specific states.

## **Services provided by school-based health centers**

School-based health centers provide a variety of services in schools nationally. They typically offer services (such as preventive care, oral health care, diagnostic care, and sometimes acute care services) going beyond the first-aid treatment traditionally provided by a school nurse.

A school-based health center may receive Medicaid funding to provide Medicaid-eligible services to Medicaid-enrolled children, if the center is enrolled as a Medicaid provider.

## **Administrative services**

School may also receive Medicaid funding to pay for certain administrative activities that are necessary for the proper and efficient administration of the Medicaid state plan. These in-school administrative activities generally fall into two categories:

- *Outreach and enrollment* – Schools may receive matching funds for outreach to potentially eligible children and families and for making enrollment determinations, if schools in the state have been delegated that function by the state Medicaid agency.
- *Facilitation and coordination of care* – Schools may use Medicaid funds to pay for activities to facilitate a child’s access to care, including care coordination, referrals, and transportation to and from care on a day a child receives a Medicaid-covered service.

## **Limitations on Medicaid payment for services provided in schools**

Of particular note to school officials, Medicaid will not pay for allowable services if another party (such as a health insurer or another federal or state program) is legally liable and responsible for providing and paying for the services<sup>22</sup>.

<sup>22</sup> For services under IDEA, Medicaid is considered the primary payer

## **Termination of the “Free Care Policy”**

Until 2014, Medicaid could not be used to pay the costs of services and activities that were generally available to all students without charge and for which no other sources of payment were pursued. For example, if all students in a school could receive free dental screenings, Medicaid could not be billed for the costs of providing those screenings to children enrolled in Medicaid<sup>23</sup>.

In December 2014, the Centers for Medicare and Medicaid Services (CMS), the federal agency that administers the Medicaid program, determined that Medicaid may pay for allowable services charged to Medicaid beneficiaries under an approved state Medicaid plan, regardless of whether the services are provided without cost to other individuals or the community at large without cost. This change has made it easier for schools to use Medicaid for the health and related services they provide to Medicaid-enrolled students as part of services provided more broadly to the entire student body, so long as all other Medicaid requirements are met.

## **Payment of the non-federal share of expenses**

Medicaid is a joint federal-state financing program under which the federal government reimburses states for the majority of expenses, but states provide the remainder of financing. The federal medical assistance percentage (FMAP) varies by state, based on the inverse of states' per-capita incomes, and currently ranges from 50 percent (the statutory minimum) to 76.39 percent. In addition, special FMAP rates apply to certain jurisdictions, situations, populations, providers, and services. (As examples, the District of Columbia and the U.S. territories have special rates; special adjusted rates apply to states undergoing disaster recovery; and special rates apply to certain preventive services and immunizations and to various administrative activities.)<sup>24</sup>

States and LEAs looking to expand the provision of eligible services with funding from Medicaid will need to determine how the non-federal share of funding will be paid. By statute, at least 40 percent of the “state share” must be financed by the state, and up to 60 percent may come from local governments. Where states are not providing the non-federal share, LEAs typically contribute by making what are known as “certified public expenditures” (CPEs). These are payments for eligible services or administrative activities, backed up by a certification that the funds were public funds used to support the full costs of the eligible service or activity. LEAs then report CPEs to the state, using a CMS-approved cost-reporting methodology<sup>25</sup>. States and LEAs will want to pay particular attention to these reporting and reimbursement requirements, to ensure that their reimbursement claims meet federal standards.

## **How are school districts actually using Medicaid funds?**

School-based services account for a very small portion of total Medicaid funding. (The \$4.5 billion reported for FY 2016 was less than 0.8 percent of total \$593 billion in Medicaid and CHIP expenditures, from all sources, in that year<sup>26</sup>.) Yet many states and school districts seeking to expand the availability of health care to needy populations have made use of this resource, and states are taking actions to make it more widely available.

- Among approximately 1,000 school districts responding to a survey administered by AASA, The School Superintendents Association, 69 percent reported that they used Medicaid to pay the salaries of health care professionals, 45 percent to expand health-related services, and 39 percent for outreach and coordination<sup>27</sup>.

<sup>23</sup> The free care rule included an exception for services provided to children pursuant to an IEP or IFSP.

<sup>24</sup> Alison Mitchell, *Medicaid's Federal Medical Assistance Percentage (FMAP)*, Congressional Research Service, April 25, 2018 – <https://fas.org/sqp/crs/misc/R43847.pdf>

<sup>25</sup> Medicaid and CHIP Payment and Access Commission (MACPAC), *Medicaid in Schools*, April 2018 – <https://www.macpac.gov/wp-content/uploads/2018/04/Medicaid-in-Schools.pdf>

- States have begun to expand their Medicaid services to take advantage of the elimination of the “Free Care” policy. For instance, **Louisiana** has expanded a policy that previously permitted schools to be reimbursed for the services that school nurses provided to Medicaid students with IEPs; they will now be reimbursed for the services provided to all Medicaid-enrolled students. However, as of early 2018, progress had been slow. For many states, making this change requires revising, and gaining CMS approval of, the state’s Medicaid plan<sup>28</sup>.
- The website of the **Ohio** Department of Education includes a “School-Based Health Care Support Toolkit” that includes a number of resources related to Medicaid, such as information on the services that may and may not be provided under the state’s program<sup>29</sup>.

ESEA Title I-A, ESEA Title IV-A, and Medicaid are likely the principal sources of direct federal support for state and local efforts to improve conditions for learning in schools. However, these programs operate within a broader context that provides additional funding for efforts to reduce food insecurity, ameliorate the problem of homelessness, ensure student access to health care and mental health care, and address other conditions for learning. These programs, described on the following pages, are ones that SEAs and LEAs should consider incorporating—at least through efforts at better coordination—in developing their conditions-for-learning strategies.

#### **4. Food and Nutrition Programs**

Addressing the problem of food insecurity will likely be a key element of a state’s strategy for improving conditions for learning. Toward that end, there are two large sources of federal funding available to states for meeting students’ food and nutrition needs: (1) the Supplemental Nutrition Assistance Program (SNAP); and (2) the school nutrition program, such as the national school lunch and school breakfast programs. Only the second of these resources is typically under the jurisdiction of the SEA, but, particularly if the SEA is able to work in coordination with other state agencies, both can be important components of a comprehensive strategy.

##### **School Nutrition Programs**

Federal support for K12 education includes several programs designed to fight hunger and improve child nutrition: the National School Lunch and School Breakfast programs, the Child and Adult Care Food program, the Summer Food Service program, the Fresh Fruit and Vegetable program, and the Special Milk program. These programs, administered at the federal level by the U.S. Department of Agriculture/Food and Nutrition Service (USDA/FNS) and in the states by state agencies, reimburse school systems, child-care centers, and after-school programs for the cost of providing healthy meals to children. In almost all cases, the state agency responsible for the program is the SEA<sup>30</sup>.

By far the largest of these programs is the National School Lunch Program (NSLP), under which children receive a meals subsidy based generally on their family income: students with family incomes below 130 percent of the federal poverty level (or whose families participate in certain other programs) receive a free lunch, those with family incomes up to 185 percent of the poverty level receive a partially

<sup>27</sup> Sasha Pudelski, *Cutting Medicaid: A Prescription to Hurt the Neediest Kids*, AASA, The School Superintendents Association, January 2017

<sup>28</sup> Phyllis Jordan, *How Can Schools Leverage Medicaid to Meet the Needs of Most Vulnerable Students?*, Georgetown University Health Policy Institute: Center for Children and Families – <https://ccf.georgetown.edu/2018/03/13/how-can-schools-leverage-medicaid-to-meet-needs-of-most-vulnerable-students/>

<sup>29</sup> <http://education.ohio.gov/Topics/Student-Supports/School-Based-Health-Care-Support-Toolkit>

<sup>30</sup> In the following five states and Puerto Rico, the program is administered by a state agency that is not the SEA: Florida (Department of Agricultural and Consumer Services), Montana (Division of Health Enhancement and Safety), Nevada (Department of Agriculture), New Jersey (Department of Agriculture), Puerto Rico (Child Nutrition Program), and Texas (Department of Agriculture). In all other States and the District of Columbia, the administering agency is the SEA. See <https://www.fns.usda.gov/school-meals/school-meals-contacts>

subsidized lunch, and those with family incomes above that level pay a higher (but still subsidized) cost for their meals. Some students are categorically eligible for free meals, such as students who are homeless, migrant, or in foster care. States then receive federal reimbursements for these costs, based on a formula established in statute and adjusted each year for changes in food costs.

Subsidized meals must meet federal nutritional requirements. Participating schools may also receive surplus agricultural commodities from USDA, as well as training and technical assistance on implementation of the program<sup>31</sup>.

In 2017, some 30 million children received a free or subsidized lunch each day. Federal costs totaled some \$12.2 billion for meal subsidies and \$1.4 billion for commodities<sup>32</sup>.

States and LEAs that wish to address food insecurity as an element of conditions for learning may do so through the “community eligibility” option. Under this provision of the statute, a school or LEA with 40 percent or more children identified as eligible (the so-called “identified school percentage” or ISP) may serve all students without having to collect and process student applications each year. Students are identified as “directly certified” based on family participation in SNAP and other means-based programs, such as Temporary Assistance for Needy Families (TANF). The school or LEA then receives a reimbursement for all meals if the ISP is above 62.5 percent or based on the ISP rate if the rate is less than 62.5 percent<sup>33</sup>.

Certain states have also taken other steps, going beyond the federal statute, to expand the reach of the NSLP or the School Breakfast program and further address students’ nutritional needs.

- A large number of states provide additional funding to help LEAs meet the portion of school meals costs that is not reimbursed by the federal government, including, in some cases, the additional costs of implementing the community eligibility option.
- Under a recently enacted California statute, a school may not shame or treat differently a student because he or she has unpaid school meals fees. Further, a school must exhaust all options for directly certifying students for NSLP eligibility and may not use debt collectors to recover meals fees. **New Mexico, Oregon, and Pennsylvania** have similar policies.
- **Kentucky** statute requires LEAs to set transportation schedules in a manner that ensures that school buses arrive in time for schools to serve breakfasts prior to the start of the instructional day.
- **Missouri** law requires agencies responsible for administering food programs, including the School Breakfast program, to collaborate in designing and implementing culturally and linguistically appropriate outreach programs focused on populations at risk of hunger<sup>34</sup>.
- The **West Virginia** Department of Education, under its West Virginia Feed to Achieve Act, enacted in 2013, carries out a number of actions to increase the reach of the federal school nutrition programs. These include offering “backpack” feeding programs, school-based food pantries, and other nontraditional means of getting shelf-stable food into the hands of students in a manner that works in the local context. The agency also promotes farm-to-school and farm-to-Head Start initiatives and other efforts to connect agriculture with education and strengthen nutritional education<sup>35</sup>.

<sup>31</sup> <https://fns-prod.azureedge.net/sites/default/files/cn/NSLPFactSheet.pdf>

<sup>32</sup> <https://schoolnutrition.org/aboutschoolmeals/schoolmealtrendsstats/>

<sup>33</sup> <https://www.fns.usda.gov/community-eligibility-provision-resource-center> and [https://fns-prod.azureedge.net/sites/default/files/cn/CEP\\_perceivedbarriers.pdf](https://fns-prod.azureedge.net/sites/default/files/cn/CEP_perceivedbarriers.pdf)

<sup>34</sup> [http://frac.org/wp-content/uploads/state\\_leg\\_table\\_scorecard.pdf](http://frac.org/wp-content/uploads/state_leg_table_scorecard.pdf)

<sup>35</sup> Conversation with West Virginia Department of Education officials, 3/6/19



## **Supplemental Nutrition Assistance Program**

The Supplemental Nutrition Assistance Program (SNAP) is the largest federal program aimed at combating hunger and food insecurity among low-income Americans. In 2016, some 44 million individuals (14 percent of the population) benefited, the vast majority of them living in poverty. Some 43 percent of participating families included at least one child<sup>36</sup>.

Although SEAs and LEAs have no direct role in the administration of the SNAP program, some districts have assisted families in enrolling for SNAP, for instance by providing for enrollment on school or district property and making available information on the LEA's website<sup>37</sup>.

In addition, SNAP-Ed, a component of the SNAP program, provides evidence-based nutrition education and obesity prevention for persons eligible for SNAP. States that elect to provide those services through SNAP receive formula funding (from the U.S. Department of Agriculture) to support those efforts<sup>38</sup>. These funds generally flow to the state human services agency and then to providers, typically the state's land-grant colleges.

As noted above, under the discussion on school nutrition programs, a school may qualify to implement the "community eligibility" option by having at least 40 percent of their students "directly certified" based on their family's participation in SNAP or another needs-based program. A school that qualifies will then be reimbursed for meal costs based on its number of directly certified students. SEA and LEA officials thus have multiple reasons to encourage participation in SNAP. First, greater participation ensures that more students come to school with a full stomach and ready to learn. Second, it reduces program costs under NLSP, because the reimbursement rate will be higher and schools implementing community eligibility will not have to go through the periodic process of recruiting and enrolling students in school lunch, including validating their eligibility.

### **Oklahoma: Focus on Child Nutrition and SNAP**

Over the last two and a half years, the **Oklahoma** Department of Education (ODE) has made child nutrition one of its key areas of focus, after determining that the state had one of the highest rates of food insecurity and one of the lowest SNAP participation rates. As set forth in its ESSA plan, the agency has set an objective of increasing the rate of school participation (among eligible schools) in the school lunch community eligibility option from 34 percent to 75 percent, and it had begun to work with LEAs on increasing their efforts at direct certification of students. It has set additional objectives for participation in the school breakfast program and the summer food program<sup>39</sup>.

In 2018 the ODE, in partnership with Hunger Free Oklahoma (HFO), a nonprofit organization, and with the State's Department of Human Services, rolled out SNAP in Schools, a pilot effort to recruit families to SNAP through the public schools and enroll them on school system premises. HFO staff worked with four school districts (Tulsa, Oklahoma City, Tahlequah, and Porter) to train front-line staff on how to engage with and help families apply for SNAP benefits. Families in those districts may now apply for benefits directly through the public schools. In 2019, the partners hope to expand the impact and reach of this initiative<sup>40</sup>.

The ODE has also worked with its partners, and with stakeholders in the state, on developing approaches to addressing food insecurity, such as providing summer meals to children in rural and remote areas where there is not enough population density to provide meals in a congregate setting.

<sup>36</sup> <https://www.pgpf.org/blog/2018/09/what-is-snap>

<sup>37</sup> As examples, see <https://www.bpsma.org/parents-community/snap> and <https://www.ellingtonpublicschools.org/parents/food>.

<sup>38</sup> <https://nifa.usda.gov/program/supplemental-nutrition-education-program-education-snap-ed>

<sup>39</sup> Oklahoma approved ESSA state plan, pages 29-30, 43-44, 105-106 – <https://www2.ed.gov/admins/lead/account/stateplan17/okconsolidatedstateplanfinalparta.pdf>

<sup>40</sup> <https://hungerfreeok.org/2018-year-review/> and <https://hungerfreeok.org/snap-tulsa/>

## **5. Individuals with Disabilities Education Act (IDEA) Part B: Grants to States**

IDEA Part B provides formula grants to states, and in turn to LEAs, for the excess costs of providing special education and related services to children with disabilities ages 3 through 21. The program is currently funded at approximately \$12.4 billion.

Within states, the SEA reserves a portion of the funding for administration and for other state-level activities such as technical assistance, personnel preparation, and educator professional development. Also specifically authorized as a state-level activity is assisting LEAs “in providing positive behavioral interventions and supports and appropriate mental health services for children with disabilities<sup>41</sup>.” Although this language, by its terms, authorizes SEAs to use their set-aside funding to support PBIS only for children with disabilities, there is nothing that would prevent an SEA seeking to coordinate such an initiative for children with disabilities as part of a broader effort (that is separately funded) to promote the adoption of PBIS within the state more generally for all children.

Part B funds not reserved at the state level (the great majority of those funds) flow to LEAs, where they are used to support provision of special education and related services to children with disabilities, as called for in each child’s IEP, or for other activities intended to benefit children with disabilities, such as professional development for teachers who serve them. The “related services” authorized to be provided include, among other things, speech-language pathology and audiology services, psychological services, physical and occupational therapy, social work services, medical services (for diagnostic and evaluation purposes), and counseling services, as well as school nurse services designed to enable a child with a disability to receive a free appropriate education in accordance with the child’s IEP<sup>42</sup>.

Again, an LEA may use IDEA funds to provide these services only to children with disabilities or for other activities that benefit them. A determination, through the IEP process, that a child needs one or more of these services and that they will be provided does not mean that new funding will become available to support that provision; rather, the LEA will finance those services through its existing Part B allocation and with state and local funds. Nonetheless, an LEA seeking to improve the conditions of learning by focusing on medical, paramedical, and mental health services will likely want to coordinate that effort with the provision of those services under IDEA and might develop an integrated approach that takes into consideration all sources of funding (including IDEA) available to support services to all categories of children.

## **6. HRSA School-Based Health Centers Program**

The Health Resources and Services Administration (HRSA), a component of the U.S. Department of Health and Human Services, provides federal support in a wide range of programs related to provision of health care, including maternal and child health, AIDS treatment and support, and preparation of health care personnel.

In 2010 the Affordable Care Act revised the Public Health Service Act, one of HRSA’s authorizing statutes, to authorize the agency to make grants for the operation of school-based health centers (SBHCs), including for the purchase and leasing of equipment; training; the payment of salaries for physicians, nurses, and other center personnel; and general management and operations costs. The amended statute also authorizes construction grants for the expansion and modernization of SBHC buildings<sup>43</sup>. Briefly, an SBHC is defined as a health clinic that: (1) is located on or near a public school facility; (2) is organized through school, community, and health-provider relationships; (3) is sponsored by a hospital, public health department, community health center, nonprofit health care agency, LEA, or a program administered by the U.S. Indian Health Service; (4) is administered by that sponsor; (5)

41 IDEA Section 611(e)(2)(C)(iii)

42 IDEA Section 602(26)(A)

43 Public Health Service Act Title III, Part Q, Section 399Z-1

provides at a minimum, and through health professionals, primary health care services to children in accordance with state and local law.

The authorization of appropriations for the SBHC operations program and construction program, respectively, expired after fiscal years 2013 and 2014. However, using unexpended funds from prior grants, HRSA has continued to make grants under the construction authority. In February 2019 the agency made 120 new grants, totally \$11 million, to enable 120 SBHCs to increase access to mental health, substance abuse, and childhood-obesity-related services. The grants will support minor repairs and renovations and the purchase of equipment, including “telehealth” equipment<sup>44</sup>.

Because there are currently no additional unexpended funds available for the program, HRSA does not expect to make further grants for the program. SEA and LEA officials might want to monitor the situation during the next few years to see if a new competition is launched. Further, officials might advocate for the federal government to provide additional appropriations.

## **7. Centers for Disease Control and Prevention: Healthy Schools Program**

The Centers for Disease Control and Prevention (CDC), a component of HHS, works with states, school districts, communities, and national organizations on a variety of initiatives aimed at preventing chronic disease and promoting the health and well-being of children and adolescents in schools<sup>45</sup>. CDC’s Healthy Schools program is anchored in the Centers’ Whole School, Whole Community, Whole Child (WSCC) model, which focuses on forging stronger connections between health care and education and on promoting evidence-based school policies and practices<sup>46</sup>.

The WSSC model has 10 components: (1) physical fitness and physical activity; (2) nutrition environment and services; (3) health education; (4) social and emotional climate; (5) physical environment; (6) health services; (7) counseling, psychological, and social services; (8) employee wellness; (9) community involvement; and (10) family engagement. Information about these components is available on the CDC website<sup>47</sup>.

As part of the Healthy Schools initiative, CDC makes grants to SEAs to support states’ implementation of evidence-based strategies to: (1) prevent obesity and reduce the risk of children and adolescents developing chronic disease in adulthood; and (2) manage chronic health conditions prevalent in student populations including poor health, asthma, food allergies, seizure disorders, and diabetes<sup>48</sup>. More specifically, in the most recent (2018) competition, CDC established objectives of increasing the number of students who: (1) consume nutritious food and beverages; (2) participate in physical education and physical activity; and (3) can effectively manage their chronic health conditions<sup>49</sup>. Seventeen SEAs won awards through this competition<sup>50</sup>.

SEAs receiving these grants carry out activities in the areas of *infrastructure development* (e.g., forming a statewide coalition with key stakeholders to advance the initiative, working with LEAs to create school health councils), *professional development and training* (e.g., training LEAs and schools on improving their wellness policies, on the physical education curriculum, and on systems for managing chronic health conditions), and *technical assistance* (e.g., assisting LEAs and schools with integrating health-promoting activities into out-of-school programs)<sup>51</sup>

<sup>44</sup> Health Resources and Services Administration, HRSA awards \$11 million to increase access to critical services at school-based health centers, February 1, 2019 – <https://www.hrsa.gov/about/news/press-releases/hrsa-awards-11-million-school-based-health-centers>

<sup>45</sup> <https://www.cdc.gov/healthyschools/about.htm>

<sup>46</sup> <https://www.cdc.gov/healthyschools/wsccl/index.htm>

<sup>47</sup> <https://www.cdc.gov/healthyschools/wsccl/components.htm>

<sup>48</sup> <https://www.cdc.gov/healthyschools/fundedpartners.htm>

<sup>49</sup> <https://foa.grantsolutions.gov/files/pa/cdc/1043839/1152891.htm>

<sup>50</sup> <https://www.cdc.gov/healthyschools/fundedpartners.htm>

<sup>51</sup> <https://foa.grantsolutions.gov/files/pa/cdc/1043839/1152891.htm>

## How have states used their CDC funds?

States have typically used the CDC Healthy Schools funds to support larger, multi-agency initiatives that address child health through the school context<sup>52</sup>.

- The **Colorado** Healthy Schools Collective Impact (HSCI) brings together a range of agencies and organizations (the SEA, the state department of public health and environment, Kaiser Permanente, the Colorado Health Foundation, etc.) to implement a set of actions focusing on comprehensive physical activity, nutrition, behavioral health, and student health services. An important objective is placing support for school health improvement in one location in a district. HSCI provides professional development, research and evaluation, and marketing and communication, among other activities<sup>53</sup>.
- **Washington** has used CDC funds to provide training on the state's Comprehensive School Physical Activity program, which is aligned with Washington's Health and Physical Education K-12 Learning Standards. With the support from CDC and the Washington Department of Health, in the 2015–2016 school year the state trained 685 participants from 255 school districts, 7 from private schools, 11 higher education professors, and 10 community partners on strategies to create healthy school nutrition environments, strengthen physical education, encourage physical activity, and support whole-child education<sup>54</sup>.
- In 2015 and 2016, the **Hawaii** Department of Health, Department of Education, and Board of Education, along with a state wellness committee, met to revise the state's wellness guidelines. In 2017, the SEA approved the revised guidelines for all public schools in Hawaii. The Department of Health continues to provide professional development and technical assistance to schools on implementation of actions and programs that align with the guidelines. Innovative programs underway in the schools often are place-based and reflect local culture<sup>55</sup>.

## 8. National Activities for School Safety

ESEA Section 4631 authorizes ED to carry out activities (directly or through grants or contracts) designed to improve students' safety and wellbeing, during or after the school day. The statute also authorizes Project SERV (School Emergency Response to Violence), which provides education-related services (including counseling and referral to mental health services as needed) to LEAs and institutions of higher education (IHEs) in which the learning environment has been disrupted by a violent or traumatic crisis.

This authority, funded at \$95 million in FY 2019, has enabled ED to support a variety of approaches for addressing student health, wellness, and safety issues. The following are the competitions ED will carry out in FY 2019<sup>56</sup>.

<sup>52</sup> The activities described in this text box were supported by the CDC State Public Health Actions to Prevent and Combat Diabetes, Heart Disease, Obesity, and Associated Risk Factors and Promote School Health program

<sup>53</sup> <https://www.cdc.gov/healthyschools/success-stories/colorado.htm> and <https://www.coloradoinitiative.org/our-work/health-wellness/healthy-schools-collective-impact/>

<sup>54</sup> <https://www.cdc.gov/healthyschools/success-stories/washington.htm>

<sup>55</sup> <https://www.cdc.gov/healthyschools/success-stories/hawaii.htm>

<sup>56</sup> As of early March, 2019, none of the competitions had yet been launched. See ED grants forecast - <https://www2.ed.gov/fund/grant/find/edlite-forecast.html#chart3>

- School Climate Transformation Grants support efforts by education officials to develop and adopt, or expand to more schools, a multi-tiered decision-making framework that guides the selection, integration, and implementation of evidence-based behavioral practices (such as PBIS) for improving school climate and behavioral outcomes. The grants help schools train teachers and other school staff to implement frameworks that provide differing levels of support and interventions to students based on their needs.

Although, in the previous competition under this program, ED made grants only to LEAs<sup>57</sup>, it appears that in the new competition both SEAs and LEAs will be eligible. Priority will go to applicants that propose to use their grants to address the opioid epidemic<sup>58</sup>.

- Project Prevent grants flow to LEAs to help schools in communities with pervasive violence break the cycle of violence by offering students: (1) access to school-based counseling services or referrals to community-based counseling services to address trauma or anxiety; (2) social and emotional supports to help address the effects of violence; (3) conflict resolution and other school-based strategies to help prevent future violence; and (4) a safer and improved school environment, which may include activities to reduce the incidence of harassment, bullying, violence, and gang involvement<sup>59</sup>.
- ED will also launch a new Mental Health Service Professionals Demonstration initiative, with details to be released shortly<sup>60</sup>.

ED also uses program funds to support a National Center on Safe Supportive Learning Environments, which provides technical assistance to SEAs, LEAs, and IHEs on improving conditions for learning in schools and classrooms and on providing safe and healthy learning environments that help prevent substance abuse, support academic success, and prevent school violence. The Center also supports the collection and dissemination of information, and the identification and use of best practices, on improving school climate<sup>61</sup>.

## **9. Education for Homeless Children and Youth**

Subtitle VII, Part B of the McKinney-Vento Homeless Assistance Act authorizes formula grants to states for activities to ensure that all homeless children and youth have equal access to the same free, appropriate public education as is available to all other students. This grant provides the only federal assistance to SEAs specifically for addressing the issue of homelessness with a state. Homelessness is broadly defined to include students sharing the housing of others due to loss of housing, economic hardship, or a similar reason, in addition to students sleeping in shelters, cars, motels, and outside.

In recent years, states have received formula allocations ranging from some \$230,000 to more than \$11.6 million, with a median of approximately \$1.1 million. With these funds, SEAs must make competitive subgrants to LEAs, for such activities as providing enriched supplemental instruction, transportation, professional development, and other activities that facilitate the enrollment, attendance, and success in school of homeless children (including preschool children) and youth. Under McKinney-Vento, all LEAs, regardless of whether they receive a subgrant, must provide homeless students with immediate enrollment in school, even if the student cannot produce typically required documents, as well as school stability despite student mobility.

<sup>57</sup> 2014 Notice Inviting Applications - <https://www.govinfo.gov/content/pkg/FR-2014-05-07/pdf/2014-10497.pdf>

<sup>58</sup> U.S. Department of Education FY 2019 Congressional Budget Justifications, pages D-11-12 -- [www2.ed.gov/about/overview/budget/budget19/justifications/d-ssce.pdf](http://www2.ed.gov/about/overview/budget/budget19/justifications/d-ssce.pdf)

<sup>59</sup> Ibid p. D-10

<sup>60</sup> ED grants forecast (see footnote 36) as of 3/5/19

<sup>61</sup> Ibid, p. D-12

<sup>62</sup> Ibid, p. C-33

In addition, SEAs may reserve 25 percent of their total allocations (50 percent in the case of the smallest states) to carry out state-level activities, including to establish and operate a State Office of Coordinator of Education of Homeless Children and Youth and to develop and carry out a state plan for the education of homeless children<sup>62</sup>.

All states desiring to receive this funding must have an Office of the Coordinator, the SEA's dedicated, federally funded office for the education of homeless individuals. That office has as its mission improving the conditions of learning for children and youth experiencing homelessness and is mandated by law to coordinate with LEAs and other agencies and outside providers in pursuing that objective. Briefly, the statutory responsibilities of this coordinator are to:

- Gather and make publicly available information on, among other issues, the number of homeless children in the state, the nature and extent of their problems in gaining access to schools and programs, and the progress of the state and its LEAs in addressing the issues faced by homeless students;
- Develop and carry out the state's plan;
- Collect and report to ED information necessary for the Department to assess the educational needs of homeless children and youth in the state;
- Coordinate with educators and with other service providers (such as community organizations, domestic violence agencies, mental health agencies, and providers of emergency and transitional housing) to improve the provision of comprehensive education and related services to homeless children and their families;
- Provide technical assistance to and conduct monitoring of LEAs to ensure that they are meeting McKinney-Vento requirements;
- Provide professional development to assist LEA personnel on meeting the needs of homeless students; and
- Respond to inquiries from parents and guardians of homeless students, to ensure that their students receive the full protections and services provided for under McKinney-Vento<sup>63</sup>.

As noted earlier, the McKinney-Vento state administrative funds also support the development and implementation of the state's plan for the education of homeless children. Each SEA receiving a McKinney-Vento formula grant must submit such a plan to ED, and the plan must include a long list of descriptions and assurances, such as descriptions of:

- The procedures that the SEA will use to identify homeless children and youth and to meet their needs;
- The state's programs that are designed to heighten the awareness of school personnel (homeless liaisons, principals and other school leaders, attendance officers, teachers, etc.) on the specific needs of homeless children and youth;
- A demonstration that the SEA and LEAs have developed, reviewed, and revised policies to remove barriers to the identification, enrollment, and retention of homeless children and youths in school; and
- The SEA's strategies for addressing problems identified in the state's report to the Secretary<sup>64</sup>.

The state's plan under McKinney-Vento will likely provide the framework for an SEA's strategy for addressing the needs of homeless children and youth in the state, as part of a broader effort to improve conditions for learning.

<sup>63</sup> McKinney-Vento Homeless Assistance Act, Section 722(f)

<sup>64</sup> McKinney-Vento Homeless Assistance Act, Section 722(g)

## **Serving Homeless Children and Youth under Title I**

The Title I statutory language, as reauthorized by ESSA, includes several provisions intended to ensure that states and LEAs address the needs of homeless students through their Title I programs. Specifically:

- A state's Title I plan must describe how the SEA will support LEAs in the identification, enrollment, attendance, and school stability of homeless children and youth.
- Each LEA must reserve a portion of its Title I allocation to serve homeless children and youth, including by providing educationally related support services to children in shelters and other locations where homeless children may live. The amount of the reservation may be based on a needs assessment that looks at the total number of homeless children and youth in the LEA and the reserved funds may be used to provide homeless students with services and activities not ordinarily provided under Title I, such as transportation to the "school of origin" and services provided by the LEA's homelessness liaison.
- An LEA's Title I plan must describe the services that the district will provide homeless children and youth, including how it will use the reserved funds and how it will coordinate those services with the services it provides under McKinney-Vento<sup>65</sup>.

Title I is thus a key resource for supporting a state and LEA's efforts to address issues related to homelessness, and provisions of the statute encourage a coordinated approach using the McKinney-Vento and Title I programs.

### **Other Programs**

In carrying out its activities under the state's McKinney-Vento plan, the SEA will likely want to coordinate with other state agencies and with community groups, including with organizations that administer other federal programs that address homelessness. Among those programs are the following:

- The *Runaway and Homeless Youth* programs administered by the U.S. Department of Health and Human Services (HHS) make grants to public and nonprofit entities for street outreach, emergency shelters, and longer-term transitional living and maternity group home programs that serve and protect runaway and homeless youth<sup>66</sup>.
- HHS's *Health Care for the Homeless* program supports community-based and patient-directed organizations that provide primary health care, substance abuse treatment, emergency care with referrals to hospitals for in-patient care services, and outreach services to help difficult-to-reach homeless persons establish eligibility for entitlement programs and housing<sup>67</sup>.
- *Projects for Assistance in Transition from Homelessness (PATH)*, also administered by HHS, provides financial assistance to states to support services for homeless individuals who have serious mental illness or serious mental illness and substance abuse. Eligible programs and activities include outreach services; screening and diagnostic treatment services; habilitation and rehabilitation services; community mental health services; alcohol or drug treatment services; staff training; case management services; supportive and supervisory services in residential settings; referrals for primary health services, job training, educational services, and relevant housing services; and a prescribed set of housing services<sup>68</sup>.

<sup>65</sup> [http://www.communityschools.org/assets/1/AssetManager/Sarah\\_Pearson\\_Notes1.PDF](http://www.communityschools.org/assets/1/AssetManager/Sarah_Pearson_Notes1.PDF)

<sup>66</sup> <https://www.acf.hhs.gov/fysb/programs/runaway-homeless-youth>

<sup>67</sup> <https://www.hhs.gov/programs/social-services/homelessness/grants/index.html>

<sup>68</sup> Ibid

- The *U.S. Department of Housing and Urban Development* has an array of programs aimed at meeting the needs of homeless individuals, such as programs to provide a continuum of care to the homeless, to provide rapid re-housing for survivors of domestic violence, and to provide housing opportunities to persons with AIDS<sup>69</sup>.

### How are SEAs using their McKinney-Vento funds?

- **Washington** has produced a McKinney-Vento School Staff Resource, which, in addition to walking LEA and school staff through the statutory requirements, provides examples of strategies available to teachers, principals, counselors, nurses, and other school staff for meeting the needs of their homeless students<sup>70</sup>.
- The websites of the **South Carolina**<sup>71</sup> and **New Mexico**<sup>72</sup> SEAs include clear information on the program (including the statutory definition of “homeless”) and links to other materials of relevance to meeting the statutory needs and meeting the needs of homeless students<sup>73</sup>.

## 10. Corporation for National and Community Service

The Corporation for National and Community Service (CNCS) is the nation’s largest maker of grants for service and volunteering, engaging some 300,000 volunteers annually through AmeriCorps, the Senior Corps, AmeriCorps VISTA, and other programs. Notably, education is one of CNCS’s principal areas of focus, with more than 44,000 AmeriCorps members and almost 45,000 Senior Corps members annually providing in-school and out-of-school support to at-risk students enrolled in almost 12,000 schools. More than half of CNCS’s budget supports education-related programs<sup>74</sup>.

SEAs and LEAs, along with other public and nonprofit entities, are authorized to apply directly to CNCS for support, or they may apply in partnership with another organization (such as an IHE, a municipality, or a nonprofit) or elect to have their schools be a service location for another applicant. Potential applicants for support will typically undertake a needs assessment, select a CNCS program that can address the identified needs, and then either request national service members from an external organization that is already receiving funding or apply directly to the Corporation for support. Among the areas that CNCS encourages educators to address are school climate, family engagement, improving attendance, social and emotional learning, wrap-around services, healthy habits (food and nutrition) community partnerships, and drug-use prevention (in addition to other, generally more academically oriented needs). CNCS has published a toolkit for educators that explains the process in detail<sup>75</sup>.

<sup>69</sup> <https://www.hudexchange.info/homelessness-assistance/>

<sup>70</sup> <http://www.k12.wa.us/HomelessEd/pubdocs/School-Staff-Resource.pdf>

<sup>71</sup> <https://ed.sc.gov/policy/federal-education-programs/essa-title-ix-part-a-mckinney-vento-homeless-assistance-act/>

<sup>72</sup> <https://webnew.ped.state.nm.us/bureaus/student-success-wellness/mckinney-vento/>

<sup>73</sup> <https://ed.sc.gov/policy/federal-education-programs/essa-title-ix-part-a-mckinney-vento-homeless-assistance-act/>

<sup>74</sup> Corporation for National and Community Service, *National Service Strengthens Education*, June 2017 - <https://www.nationalservice.gov/sites/default/files/documents/EducationSupport.pdf>

<sup>75</sup> Corporation for National and Community Service, *Leveraging National Service in Your Schools: A Superintendent’s/Principal’s Toolkit to Utilizing National Service Resources*, January 2018 – <https://www.nationalservice.gov/sites/default/files/documents/SuperintendentToolkit-01102018-508.pdf>



## How are SEAs participating in CNCS programs?

CNCS's Leveraging National Service in Your Schools toolkit contains examples of how the Corporation's education-focused programs are implemented in states and LEAs. Among those examples:

- **Colorado** is focusing on early childhood education, high school graduation, and services for rural youth. Across the state, some 700 AmeriCorps members are, among other things, providing evidence-based and targeted interventions to students with attendance problems and engaging in projects to improve school climate. Some 4,400 Senior Corps volunteers are one-on-one with students who may have special needs, be considered at-risk, or suffer from abuse and neglect.

The current effort began in 2014 with meetings between CNCS officials, the State's Service Commission, the Colorado SEA, and elected officials, where participants analyzed the state's needs and mapped current national service investments. Local stakeholders identified a lack of education services for rural youth as a pressing need that national service could address. For the project launch, rural communities with the lowest dropout rates were given priority, and the Colorado Department of Education worked with CNCS staff on identifying evidence-based practices for implementation.

As of the end of 2017, volunteers had carried out such activities as providing math and literacy coaching, launching a farm-to-cafeteria program, and performing infrastructure repair. Further, through the Colorado Youth for a Change AmeriCorps program, volunteers worked with off-track in-school youth and disengaged out-of-school youth to help them reengage and reenroll in school.

- **Minnesota** has focused on reading and literacy. This effort began in 2002 when a state legislator became concerned about Minnesota's low literacy rates and began working with state CNCS officials on a solution. The legislature then provided an initial appropriation for the new Minnesota Reading Corps, which has worked closely with the Minnesota Department of Education to implement volunteer programs across the state. Initially, volunteers began tutoring Head Start participants, but the program has expanded to include students through grade 3. Since 2003, volunteers have served more than 200,000 age 3 through grade 3 students. State funds are appropriated to the SEA. The Reading Corps has now expanded to 12 other states and DC, and complementary Minnesota Math Corps began in 2008.

Separately, the state's "GradMinnesota" program operates through a partnership between the SEA, the governor's office, and the Minnesota Alliance with Youth. It is part of the GradNation campaign led by the America's Promise Alliance. Through this initiative, AmeriCorps volunteers serve in middle schools, high schools, and community organizations, delivering interventions focused on attendance, behavior, and coursework and designed to reduce dropout rates.

<sup>76</sup> Ibid



family and community engagement activities and two-generation approaches that support improved economic, educational, health, safety, and other outcomes and that address the issues of intergenerational poverty.

While schools implementing the Title I targeted assistance model may use their Title I funds only to serve eligible (academically disadvantaged) children, those funds may be used to implement strategies for increasing the involvement of parents of those children. Moreover (as described above in the discussion of targeted assistance programs), in limited situations the funds may be used to support health, nutrition, and other social services.

- Title I School Improvement Funds: Under Title I, SEAs must implement accountability systems that, among other things, identify the lowest 5 percent of Title I schools in the states (as well as high schools with less than a 67 percent graduation rate) for “comprehensive support and improvement” (CSI). These schools must then develop and implement, in consultation with stakeholders, a plan for addressing deficiencies in the school and improving student outcomes. SEAs approve each CSI plan and reserve approximately 7 percent of the State’s total Title I allocation to support the improvement efforts of CSI schools, as well as an additional group of schools that have significant gaps in achievement across student subgroups. The CSI process represents an opportunity for a school to adopt the community school model, and the state set-aside money provides potential support for such an effort.
- ESEA Title IV-A: As described above in the section on Title IV-A, program funds may be used for such initiatives as activities to promote volunteering and community engagement, school-based mental health services, child abuse awareness and prevention, and integrated learning systems of student and family supports.
- Full-Service Community Schools: Under ESEA Section 4625, ED makes grants to LEAs and the BIE, in partnership with community-based organizations, nonprofit organizations, and other public or private entities. Grantees provide comprehensive academic, social, and health services in school settings (for students, their family members, and other community members), integrating coordinated strategies intended to improve academic and life outcomes in neighborhoods with high rates of poverty, childhood obesity, academic failure, and community member involvement in the criminal justice system.

The program is small (\$17.5 million in FY 2019), but its architecture is well aligned with the community schools model. An SEA may participate in a grant as an “other public entity” partner.

- Promise Neighborhoods: This program (authorized under ESEA 4624) is another grant program well designed to support community schools. ED makes grants to: (1) IHEs; (2) Indian tribes and tribal organizations; and (3) one or more non-profit organizations working in partnership with a high-need LEA, an IHE, a local government, or a tribe or tribal organization. The grants support efforts to provide a continuum of services and supports (such as, among others, high-quality early childhood education; school and out-of-school programming; support for family and community engagement; job training, internships, and career counseling; social, health, nutrition, and mental health services; and juvenile crime prevention) in high-need neighborhoods. The program is funded at approximately \$78.3 million in FY 2019.
- Other federal programs, as applicable to the individual school and community, such as McKinney-Vento, HRSA and CNCS grants, Head Start and Early Head Start, the Child Care and Development Block Grant, and the Community Services Block Grant<sup>79</sup>.

<sup>79</sup> See Coalition for Community Schools, *Uses of Title I Funds for Parent Engagement and Community Schools* ([http://www.communityschools.org/assets/1/AssetManager/Sarah\\_Pearson\\_Notes1.PDF](http://www.communityschools.org/assets/1/AssetManager/Sarah_Pearson_Notes1.PDF)) for additional details

## IV. STRATEGIES FOR STATES TO CONSIDER

The term “conditions for learning” refers, broadly speaking, to the nonacademic factors that have a profound influence on student achievement and other student outcomes. The term thus covers a wide range of concerns, everything from whether students and their families are adequately housed, to whether their food and nutrition needs are being met, to whether they have access to health care (including dental and mental health care), to the physical environment of the schools they attend, to whether those schools have high-quality equipment and materials, including up-to-date educational technology.

Addressing the conditions of learning might therefore seem like an almost overwhelming assignment for an SEA; with so many phenomena affecting those conditions, questions about which issues to take on, in what order, and how are likely to be very challenging. In states that have a strong tradition of “local control,” or limited state-level public-school financing, or both, the challenges may be even more difficult.

Nonetheless, as descriptions provided throughout this report demonstrate, there are numerous federal programs that, combined with state, local, and private resources, can support an SEA campaign to improve the conditions for learning within a state. In addition, as also described in the previous sections, there are significant examples of actions that SEAs around the nation have taken to improve one or more of the conditions of learning. There is much that can be done, and there are solid examples of states that are making progress.

In support of potential state efforts, we offer some ideas, drawn from state experiences, of strategies that SEAs might employ in addressing the conditions for learning. As noted earlier, every SEA will operate in a different state environment, facing different demographics, state laws and programs, and public needs. In improving the conditions for learning, one size will definitely not fit all. Still, the following suggestions should be of general validity across a variety of contexts.

### 1. Begin by assessing the state’s needs

While in most states there will be much to do in improving conditions for learning, and policymakers will want to get started quickly, it is first important to understand the state’s needs. If nothing else, a needs analysis should help the SEA identify the highest priorities for action. That analysis should draw on the best available data regarding the full continuum of issues related to conditions for learning, as well as on input from various stakeholders.

Make sure the needs analysis is sensitive to variations within the state, and that it looks at all the relevant conditions and factors. For example, urban and rural communities may have very different needs. Different demographic communities might also vary. For example, some states are finding very low SNAP participation rates among the immigrant community, likely because of concerns about recent federal immigration policies<sup>80</sup>. This phenomenon may require different strategies for reducing food insecurity in that community.

Similarly, staff should be careful to ensure that the needs analysis looks at all factors that might affect the success or failure of state actions. For example, **Pennsylvania**, which is taking aggressive actions to improve students’ access to mental health services, is running into the barrier of a shortage of mental health professionals in the state<sup>81</sup>. A needs analysis, and development of an action plan, should thus look not just at the needs in the schools, but at such issues as the need for additional personnel who could meet those student needs.

<sup>80</sup> Conversation with Hunger Free Oklahoma, 3/11/19

<sup>81</sup> Conversation with Pennsylvania Department of Education and Department of Human Services officials, 3/12/19

## **2. Make sure the needs analysis and the state’s action plans draw on input from a wide range of stakeholders**

A state’s needs analysis will not be complete if it relies on statewide data and does not draw on the voices of communities within the state, including students and parents; educators; nonprofit organizations; private businesses; ethnic, racial, and tribal groups; and other members of the public. Going beyond the needs analysis, the development and implementation of a state’s plan for strengthening conditions for learning should also draw on many voices. Only by reaching out to all elements of the community will an SEA be able to feel confident that it has identified all of the needs and is putting together a plan to address those needs.

## **3. Establish, or strengthen, connections with other state agencies**

While the SEA will typically administer all of the relevant federal and state education programs, and in most cases the school nutrition programs, other programs (SNAP, health and mental health, housing) will be outside the SEA’s jurisdiction. Forging an effective initiative to improve conditions for learning will require strong connections with state agencies like the health, social services, and agriculture departments, as well as new thinking about how the programs and activities of these different agencies can be deployed in support of better services. SEAs might want to form task forces or other ad hoc mechanisms for working with their fellow agencies on these cross-cutting issues.

## **4. Look across the range of federal and state programs that can support your initiatives, and be creative in thinking about how they can address conditions for learning. If new federal programs come on line, think creatively about how they can support the effort**

As the earlier discussion indicates, there is a wide range of federal programs that can support improvement of the conditions for learning, but in some cases (such as ESEA Title I) the programs have not historically been used in that manner. With other programs, such as Medicaid, the pattern of participation varies significantly by state. Whether state programs are available that can back up the federal funding streams will also differ by state, but the SEA should think aggressively and creatively about what sources might be tapped. In part, this can be done through enhanced communication and coordination with other state agencies.

While major new federal programs are not often created, when they come on line you can consider whether they can become additional vehicles to support your efforts. For example, ESEA Title IV-A is a new program, receiving its first appropriation only in fiscal year 2017. In that year, the appropriation was small (\$400 million, or about \$4 to 5 million for an average-size state). With the average SEA to receive only some \$225,000 for state-level activities, most states did not describe, in their ESSA plans, extensive activities for the use of those funds. However, Title IV-A funding has grown quickly, to \$1.17 billion in fiscal year 2019, and it now constitutes a significant resource for support conditions-for-learning-related activities.

## **5. Advocate for new state programs that can fill in any gaps left by federal programs**

As noted earlier, West Virginia’s “Feed to Achieve” law supports enhanced efforts in school-based child nutrition and funds activities that cannot be financed through the federal nutrition programs<sup>82</sup>. In difficult budget times state legislatures may be able to create and fund only limited new initiatives. SEAs should consider proposing policies that address any gaps left by the federal programs.

<sup>82</sup> Conversation with West Virginia Department of Education, 3/6/19

## **6. Develop and carry out a strategy that is characterized by clear planning and frequent measurement of success**

Develop clear procedures that can be replicated as the process continues and even if staffing turns over. Frequently measure, examine, and report on whether you are achieving the intended results. Focus on integration and collaboration throughout the process, as they will likely be critical to your success. Keep the focus on what works during a period of change.

## **7. Begin with pilot efforts that can later be scaled up and launch them initially in places that have the greatest need. As you do so, be sensitive to the variations in systems that are in place in different communities**

Particularly if your initiatives involve new and innovative ways of doing business, you probably will not be able to implement them everywhere, statewide, all at once. Begin in schools and communities that have the greatest need for additional services, as identified in your needs analysis, and begin by focusing on the conditions-for-learning issues where there is the greatest need. Identify interventions that can be scaled up. Implement carefully, making sure to document and learn from your experiences.

Further, bear in mind that, for certain types of services such as health care and mental health, differing bureaucratic and funding systems might be in place within a state, so differing arrangements for expanding services might be needed. For example, in Pennsylvania, as the state has sought to increase student access to mental health services, officials have discovered that counties within the commonwealth have varied arrangements for provision and financing of those services. This variation has required that the state adapt its initiative to the systems in place in the different counties.

## **8. Begin with reasonable expectations**

Bear in mind that improving the conditions for learning may require changing long-standing conditions that cannot always be done easily. For example, in some parts of the country, or within a state, there are populations who have a historic cultural resistance to accepting public assistance, which can hold down participation rates under programs like SNAP and Medicaid. These obstacles can be overcome, but it typically takes time.

## **9. Develop stronger working relationships with your state's LEAs, and with major nonprofit organizations and coalitions in your state**

Although there is much that can be done at the state level to improve conditions for learning, under programs like ESEA Title I and Title IV-A almost all the funds flow by formula to LEAs, and spending decisions are made at the local level. Strong local control is a feature of these programs and, indeed, in many states is baked into the fabric of educational governance. While recognizing those facts, SEAs can take actions to work with district officials in bringing about a consensus on conditions for learning and moving ahead with strategies that respect local prerogatives but bring about progress. It will be important to gain the support of top district leaders, support that they can communicate to everyone in the LEA.

In addition, many states have statewide or regional coalitions or leading nonprofit organizations that are focused on hunger, homelessness, mental health, or other issues. These groups can serve a vital role in connecting the SEA to other members of the community who are concerned

with and active on their issue of concern, and might offer expertise and experience that is unavailable within the SEA. Further, in states where the SEA (or another state agency) has limited staff resources, the nonprofits and coalitions might be able to act as service providers, delivering training, technical assistance, or other services to LEAs. SEAs will very likely want to engage with these entities, where they are present.

## 10. Look for evidence-based solutions

In recent years, SEAs and LEAs have become accustomed to implementing federal education statutes that call for the use of evidence-based strategies, programs, policies, and interventions, where the relevant evidence is available. The same should be the case when SEAs take actions in areas like student health and nutrition, and mental health. Seek out, from reputable sources, the research evidence on different approaches that the SEA might be considering. Having an evidence base should build public and policymaker support for your strategy, in addition to giving it a greater likelihood of success. As one example a number of states, such as Pennsylvania, are working to expand the use of PBIS as part of a strategy for addressing student mental health issues<sup>83</sup>.

## V. CONCLUSION

Improving the conditions for learning is a core element of CCSSO's commitment to ensuring that all students receive a high-quality education that will prepare them for lifelong learning, success in the workforce, and participation in our democracy. As part of that commitment, this year the Council, under the leadership of Secretary Rivera, is focusing on highlighting actions that SEAs can take to improve conditions for learning, with a particular focus on food security, physical health and wellness, mental health, and homelessness. Included in that focus is this effort to ensure that all SEAs are aware of the federal resources that are available to them, along with their public and non-profit partners, for assembling a comprehensive approach to tackling these student needs.

Through our research, we have identified a large array of federal programs, not only in the U.S. Department of Education but in other agencies such as the Department of Agriculture, the Corporation for National and Community Service, and bureaus of the Department of Health and Human Services, that can be deployed. Some of these programs are well known to SEAs and LEAs, but are not typically used for actions related to conditions for learning. Others may be less well known and are not employed consistently across the states. We hope that this guide increases the knowledge base regarding these important resources.

In addition, through our research and our conversations with practitioners, we have identified some preliminary "lessons learned" that might guide the states as they begin to tackle more of the issues or to step up their current efforts. State chiefs might consider some of these recommendations as they develop and implement strategies to ensure all students have a strong foundation for learning in place and access to the supports they need to thrive.

<sup>83</sup> Conversation with Pennsylvania Department of Education and Department of Human Services officials, 3/12/19

