

File ID Number	14-2400
Introduction Date	12-10-14
Enactment Number	14-2009
Enactment Date	12/19/14
By	AW



**OAKLAND UNIFIED  
SCHOOL DISTRICT**

*Community Schools, Thriving Students*

**OAKLAND UNIFIED SCHOOL DISTRICT  
Office of the Board of Education**

December 10, 2014

To: Board of Education

From: Antwan Wilson, Superintendent

Subject: **District Submitting Grant Award - Breaking the Cycle of Violence: Trauma Informed Restorative Practices Project - U.S. Department of Education**

**ACTION REQUESTED:**

Approval and support by the Board of Education of District applicant submitting grant award for OUSD high schools to the U.S. Department of Education, Office of Safe and Drug Free Schools and Communities, Breaking the Cycle of Violence: Trauma Informed Restorative Practices Project Grant Award for the support of Oakland Unified School District's violence prevention to improve outcomes for students exposed to pervasive violence and decrease the loss of instructional time resulting from disciplinary referrals, for fiscal years 2014-2019 to accept same, if granted, in whole or in part, pursuant to the terms and conditions thereof and to submit amendments thereto, for the grant years, if any.

**BACKGROUND:**

Grant award for OUSD schools for the 2014-2019 fiscal years were submitted for funding as indicated in the chart below. The Grant Face Sheet and grant application packets are attached.

File I.D #	Backup Document Included	Type	Recipient	Grant's Purpose	Time Period	Funding Source	Grant Amount
14-2400	Yes	Grant	Oakland Unified School District Schools: Castlemont, Fremont, McClymonds, Oakland High, Oakland Technical, and Skyline High Schools.	To support Oakland Unified School District's violence prevention programs to improve outcomes for students exposed to pervasive violence and decrease the loss of instructional time resulting from disciplinary referrals.	10/01/2014 - 09/30/2019	U.S. Department of Education, Office of Safe and Drug Free Schools and Communities	\$2,943,108.10

**DISCUSSION:**

The district created a Grant Face sheet process to:

- Review proposed grant projects at OUSD sites and assess their contribution to sustained student achievement
- Identify OUSD resources required for program success

OUSD received a Grant Face Sheet and a completed grant application for the program listed in the chart by the school.

**FISCAL IMPACT:**

The total amount of grants will be provided to OUSD schools from the funders.

- Grants valued at: \$2,943,108.10

**RECOMMENDATION:**

Approval and support by the Board of Education of District applicant submitting a grant award for OUSD high schools for fiscal years 2014-2019 to accept same, if granted, in whole or in part, pursuant to the terms and conditions thereof and to submit amendments thereto, for the grant year, if any.

**ATTACHMENTS:**

Grant Face Sheet

Grant Award Notification

Budget Narrative

Project Narrative

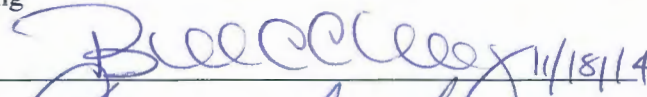
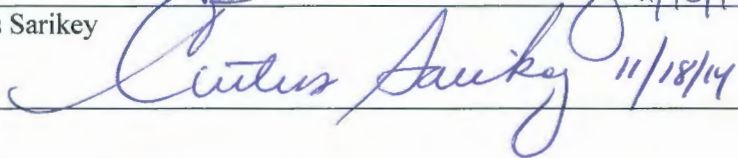
OUSD Grants Management Face Sheet

<b>Title of Grant:</b> Breaking the Cycle of Violence: Trauma Informed Restorative Practices Project	<b>Funding Cycle Dates:</b> 10/1/14-9/30/19
<b>Grant's Fiscal Agent:</b> (contact's name, address, phone number, email address) Stephanie Barnes U.S. Department of Education 550 12 <sup>th</sup> Street, SW, Room 6087 Washington, DC, 20202 (202)245-8006	<b>Grant Amount for Full Funding Cycle:</b> \$2,943,108.10
<b>Funding Agency:</b> U.S. Department of Education Office of Safe and Drug Free Schools and Communities	<b>Grant Focus:</b> Violence Prevention
<b>List all School(s) or Department(s) to be Served:</b> Castlemont, Fremont, McClymonds, Oakland High, Oakland Technical, and Skyline High Schools	

Information Needed	School or Department Response
How will this grant contribute to sustained student achievement or academic standards?	By taking a trauma informed lens to OUSD's tiered system of supports, this project will improve outcomes for students exposed to pervasive violence hence decreasing the loss of instructional time resulting from disciplinary referrals.
How will this grant be evaluated for impact upon student achievement?  (Customized data design and technical support are provided at 1% of the grant award or at a negotiated fee for a community-based fiscal agent who is not including OUSD's indirect rate of 5.94% in the budget. The 1% or negotiated data fee will be charged according to an Agreement for Grant Administration Related Services payment schedule. This fee should be included in the grant's budget for evaluation.)	Evaluation outcomes of this grant include a decrease in the number of violence related suspensions, increase in the number of students receiving behavioral health services, increase in the number of students reporting high levels of school connectedness, and a decrease in violence related disciplinary referrals at target schools.
Does the grant require any resources from the school(s) or district? If so, describe.	The grant leverages existing mental health and restorative justice services at grantee schools and builds upon those with additional funding supplied by the grant.
Are services being supported by an OUSD funded grant or by a contractor paid through an OUSD contract or MOU?  (If yes, include the district's indirect rate of 5.94% for all OUSD site services in the grant's budget for administrative support, evaluation data, or indirect services.)	District will contract for evaluation, PD, MH services, and Restorative Justice coordinators.
Will the proposed program take students out of the classroom for any portion of the school day? (OUSD reserves the right to limit service access to students during the school day to ensure academic attendance continuity.)	Classroom teachers and/or site leadership will be consulted regarding optimal times for students to receive services so as not to interrupt academic instruction.
Who is the contact managing and assuring grant compliance? (Include contact's name, address, phone number, email address.)	Barbara McClung, Director of Behavioral Health Initiatives, CSSS Department 746 Grant Ave Oakland, CA 94610 (415) 533-3709 Email: <a href="mailto:barbara.mcclung@ousd.k12.ca.us">barbara.mcclung@ousd.k12.ca.us</a>



**Applicant Obtained Approval Signatures:**

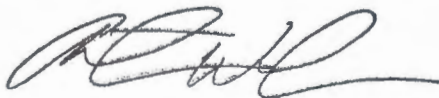
Entity	Name/s	Signature/s	Date
Director	Barbara McClung		11/18/14
Department Head (e.g. for school day programs or for extended day and student support activities)	Curtiss Sarikey		11/18/14

**Grant Office Obtained Approval Signatures:**

Entity	Name/s	Signature/s	Date
Fiscal Officer	Vernon Hal		
Superintendent	Antwan Wilson		



David Kakishiba  
President, Board of Education



Antwan Wilson  
Secretary, Board of Education

File ID Number: 14-2400  
Introduction Date: 12/10/14  
Enactment Number: 14-2029  
Enactment Date: 12/10/14  
By: B.D.

**US Department of Education  
Washington, D.C. 20202**

**GRANT AWARD NOTIFICATION**

<b>1</b> RECIPIENT NAME  Oakland Unified School District Behavioral Health Initiatives 1000 Broadway, Suite 680 Oakland, CA 94607 - 4099	<b>2</b> AWARD INFORMATION  PR/AWARD NUMBER      S184M140126 ACTION NUMBER        0 ACTION TYPE            New AWARD TYPE            Discretionary															
<b>3</b> PROJECT STAFF  RECIPIENT PROJECT DIRECTOR Barbara McClung            (415) 533-3709 <a href="mailto:barbara.mcclung@ousd.k12.ca.us">barbara.mcclung@ousd.k12.ca.us</a> EDUCATION PROGRAM CONTACT Earl Myers                    (202) 453-6716 <a href="mailto:earl.myers@ed.gov">earl.myers@ed.gov</a> EDUCATION PAYMENT HOTLINE G5 PAYEE                    888-336-8930 HELPDESK <a href="mailto:edcaps.user@ed.gov">edcaps.user@ed.gov</a>	<b>4</b> PROJECT TITLE  84.184M Breaking the Cycle of Violence: Trauma Informed Restorative Practice Project															
<b>5</b> KEY PERSONNEL  <table border="0"> <thead> <tr> <th><u>NAME</u></th> <th><u>TITLE</u></th> <th><u>LEVEL OF EFFORT</u></th> </tr> </thead> <tbody> <tr> <td>Barbara McClung</td> <td>Project Director</td> <td>10 %</td> </tr> </tbody> </table>		<u>NAME</u>	<u>TITLE</u>	<u>LEVEL OF EFFORT</u>	Barbara McClung	Project Director	10 %									
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5	10/01/2018 - 09/30/2019	\$586,714.79														
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PERFORMANCE PERIOD	\$596,249.00															
<b>8</b> ADMINISTRATIVE INFORMATION  DUNS/SSN            076554500 REGULATIONS        EDGAR AS APPLICABLE 2 CFR AS APPLICABLE ATTACHMENTS        A , C , E1 , E2 , E4 , E5 , E6 , E7 , F , N , O , S , U , V , W																
<b>9</b> LEGISLATIVE AND FISCAL DATA  AUTHORITY:            PL 107-110 IV-A SAFE & DRUG-FREE SCHOOLS AND COMMUNITIES ACT OF ESEA, AS AMENDED PROGRAM TITLE:        SAFE AND DRUG-FREE SCHOOLS AND COMMUNITIES - NATIONAL PROGRAMS																



**US Department of Education  
Washington, D.C. 20202**

S184M140126

**GRANT AWARD NOTIFICATION**

CFDA/SUBPROGRAM NO: 84.184M

FUND CODE	FUNDING YEAR	AWARD YEAR	ORG. CODE	CATEGORY	LIMITATION	ACTIVITY	CFDA	OBJECT CLASS	AMOUNT
0203A	2014	2014	ES000000	B	GA6	MMM	184	4101C	\$596,249.00

**10**

PR/AWARD NUMBER: S184M140126  
 RECIPIENT NAME: Oakland Unified School District  
 Behavioral Health Initiatives

**TERMS AND CONDITIONS**

- (1) The Office of Management and Budget requires all Federal agencies to assign a Federal Award Identifying Number (FAIN) to each of their financial assistance awards. The PR/AWARD NUMBER identified in Block 2 is your FAIN.

If you subaward under this grant, you must document the assigned PR/AWARD NUMBER (FAIN) identified in Block 2 of this Grant Award Notification on each subaward made under this grant. The term subaward means:

- 1. A legal instrument to provide support for the performance of any portion of the substantive project or program for which you received this award and that you as the recipient award to an eligible subrecipient.
- 2. The term does not include your procurement of property and services needed to carry out the project or program (for further explanation on the principles that can be used in identifying a procurement as distinct from a subaward, see Sec. --- .210(b)-(d) of OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations").
- 3. A subaward may be provided through any legal agreement, including an agreement that you or a subrecipient considers a contract.

- (2) THE FOLLOWING ITEMS ARE INCORPORATED IN THE GRANT AGREEMENT: (1) THE RECIPIENT'S APPLICATION (BLOCK 4), (2) THE APPLICABLE EDUCATION DEPARTMENT REGULATIONS (BLOCK 8), AND (3) THE SPECIAL TERMS AND CONDITIONS SHOWN AS ATTACHMENTS (BLOCK 8).

THIS AWARD SUPPORTS ONLY THE BUDGET PERIOD SHOWN IN BLOCK 6. IN ACCORDANCE WITH 34 CFR 75.253, THE DEPARTMENT OF EDUCATION WILL CONSIDER CONTINUED FUNDING IF: (1) CONGRESS HAS APPROPRIATED SUFFICIENT FUNDS UNDER THE PROGRAM, (2) THE DEPARTMENT DETERMINES THAT CONTINUING THE PROJECT WOULD BE IN THE BEST INTEREST OF THE GOVERNMENT, (3) THE RECIPIENT HAS MADE SUBSTANTIAL PROGRESS TOWARD MEETING THE OBJECTIVES IN ITS APPROVED APPLICATION, AND (4) THE RECIPIENT HAS SUBMITTED REPORTS OF PROJECT PERFORMANCE AND BUDGET EXPENDITURES THAT MEET THE REPORTING REQUIREMENTS FOUND AT 34 CFR 75.118 AND ANY OTHER REPORTING REQUIREMENTS ESTABLISHED BY THE SECRETARY.

IN ACCORDANCE WITH 34 CFR 74.25(c)(2), OR 34 CFR 80.30(d)(3) CHANGES TO KEY PERSONNEL IDENTIFIED IN BLOCK 5 MUST RECEIVE PRIOR APPROVAL FROM THE DEPARTMENT.

THE SECRETARY ANTICIPATES FUTURE FUNDING FOR THIS AWARD ACCORDING TO THE SCHEDULE IDENTIFIED IN BLOCK 6. THESE FIGURES ARE ESTIMATES ONLY AND DO NOT BIND THE SECRETARY TO FUNDING THE AWARD FOR THESE PERIODS OR FOR THE SPECIFIC AMOUNTS SHOWN. THE RECIPIENT WILL BE NOTIFIED OF SPECIFIC FUTURE FUNDING ACTIONS THAT THE SECRETARY TAKES FOR THIS AWARD.

- (3) OMB Circular No. A-133 requires that all non-federal entities that expend \$500,000 or more in a year in Federal awards shall have a single audit or program specific audit conducted for that year. These audits shall be submitted within 30 days after receipt of the auditor's report(s) or nine months after the end of the audit period whichever occurs first.

**US Department of Education  
Washington, D.C. 20202**

**GRANT AWARD NOTIFICATION**

A special condition has been placed on this grant award due to two outstanding audits not found in the Federal Audit Clearinghouse. We are requiring the grantee to submit the missing audits within 90 days of receiving their Project Prevent award. If the outstanding audits are not submitted within the 90 day period, the applicant will be placed on cost reimbursement status until the outstanding audits have been submitted.

*Debbie Kalenasy*  
AUTHORIZING OFFICIAL

9/22/14  
DATE



# EXPLANATION OF BLOCKS ON THE GRANT AWARD NOTIFICATION

For Discretionary, Formula and Block Grants (See Block 2 of the Notification)

**1. RECIPIENT NAME** - The legal name of the recipient, name of the primary organizational unit that

**2. AWARD INFORMATION** - Unique items of information that identify this notification.

**PR/AWARD NUMBER** - A unique, identifying number assigned by the Department to each application. On funded applications, this is commonly known as the "grant number" or "document number."

**ACTION NUMBER** - A numeral that represents the cumulative number of steps taken by the Department to date to establish or modify the award through fiscal or administrative means. Action number "01" will always be "NEW AWARD"

**ACTION TYPE** - The nature of this notification (e.g., NEW AWARD, CONTINUATION, REVISION, ADMINISTRATIVE)

**AWARD TYPE** - The particular assistance category in which funding for this award is provided, i.e., DISCRETIONARY, FORMULA, or BLOCK.

**3. PROJECT STAFF** - This block contains the names and telephone numbers of the U.S. Department of Education and recipient staff who are responsible for project direction and oversight.

**\*RECIPIENT PROJECT DIRECTOR** - The recipient staff person responsible for administering the project. This person represents the recipient to the U.S. Department of Education.

**EDUCATION PROGRAM CONTACT** - The U.S. Department of Education staff person responsible for the programmatic, administrative and business management concerns of the Department.

**EDUCATION PAYMENT CONTACT** - The U.S. Department of Education staff person responsible for payments or questions concerning electronic drawdown and financial expenditure reporting.

**4. PROJECT TITLE AND CFDA NUMBER** - Identifies the Catalog of Federal Domestic Assistance (CFDA) subprogram title and the associated subprogram number.

**5.\* KEY PERSONNEL** - Name, title and percentage (%) of effort the key personnel identified devotes to the project.

**6. AWARD PERIODS** - Project activities and funding are approved with respect to three different time periods, described below:

**BUDGET PERIOD** - A specific interval of time for which Federal funds are being provided from a particular fiscal year to fund a recipient's approved activities and budget. The start and end dates of the budget period are shown.

**PERFORMANCE PERIOD** - The complete length of time the recipient is proposed to be funded to complete approved activities. A performance period may contain one or more budget periods.

**\*FUTURE BUDGET PERIODS** - The estimated remaining budget periods for multi-year projects and estimated funds the Department proposes it will award the recipient provided substantial progress is made by the recipient in completing approved activities, the Department determines that continuing the project would be in the best interest of the Government, Congress appropriates sufficient funds under the program, and the recipient has submitted a performance report that provides the most current performance information and the status of budget expenditures.

**7. AUTHORIZED FUNDING** - The dollar figures in this block refer to the Federal funds provided to a recipient during the award periods.

**\*THIS ACTION** - The amount of funds obligated (added) or de-obligated (subtracted) by this notification.

**\*BUDGET PERIOD** - The total amount of funds available for use by the grantee during the stated budget period to this date.

**\*PERFORMANCE PERIOD** - The amount of funds obligated from the start date of the first budget period to this date.

**RECIPIENT COST SHARE** - The funds, expressed as a percentage, that the recipient is required to contribute to the project, as defined by the program legislation or regulations and/or terms and conditions of the award.

**RECIPIENT NON-FEDERAL AMOUNT** - The amount of non-federal funds the recipient must contribute to the project as identified in the recipient's application. When non-federal funds are identified by the recipient where a cost share is not a legislation requirement, the recipient will be required to provide the non-federal funds.

**8. ADMINISTRATIVE INFORMATION** - This information is provided to assist the recipient in completing the approved activities and managing the project in accordance with U.S. Department of Education procedures and regulations.

**DUNS/SSN** - A unique, identifying number assigned to each recipient for payment purposes. The number is based on either the recipient's assigned number from Dun and Bradstreet or the individual's social security number.

**\*REGULATIONS** - \*REGULATIONS - The parts of the Education Department General Administrative Regulations (EDGAR), specific program regulations (if any), and other titles of the Code of Federal Regulations that govern the award and administration of this grant.

**\*ATTACHMENTS** - Additional sections of the Grant Award Notification that discuss payment and reporting requirements, explain Department procedures, and add special terms and conditions in addition to those established, and shown as clauses, in Block 10 of the award. Any attachments provided with a notification continue in effect through the project period until modified or rescinded by the Authorizing Official.

**9. LEGISLATIVE AND FISCAL DATA** - The name of the authorizing legislation for this grant, the CFDA title of the program through which funding is provided, and U.S. Department of Education fiscal information.

**FUND CODE, FUNDING YEAR, AWARD YEAR, ORG.CODE, PROJECT CODE, OBJECT CLASS** -

The fiscal information recorded by the U.S. Department of Education's Grant Administration and Payment System to track obligations by award.

**AMOUNT** - The amount of funds provided from a particular appropriation and project code. Some notifications authorize more than one amount from separate appropriations and/or project codes. The total of all amounts in this block equals the amount shown on the line, "THIS ACTION" (See "AUTHORIZED FUNDING" above (Block 7)).

**10. TERMS AND CONDITIONS** - Requirements of the award that are binding on the recipient.

**\*AUTHORIZING OFFICIAL** - The U.S. Department of Education official authorized to award Federal funds to the recipient, establish or change the terms and conditions of the award, and authorize modifications to the award

**FOR FORMULA AND BLOCK GRANTS ONLY:**

(See also Blocks 1, 2, 4, 6, 8, 9 and 10 above)

**3. PROJECT STAFF** - The U.S. Department of Education staff persons to be contacted for programmatic and payment questions.

**7. AUTHORIZED FUNDING**

**CURRENT AWARD AMOUNT** - The amount of funds that are obligated (added) or de-obligated (subtracted) by this action.

**PREVIOUS CUMULATIVE AMOUNT** - The total amount of funds awarded under the grant before this action.

**CUMULATIVE AMOUNT** - The total amount of funds awarded under the grant, this action included.

\* This item differs or does not appear on formula and block grants.



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF THE CHIEF FINANCIAL OFFICER  
& CHIEF INFORMATION OFFICER

Barbara McClung  
Oakland Unified School District  
Behavioral Health Initiatives  
1000 Broadway, Suite 680

Oakland, CA 94607 - 4099

SUBJECT: Payee Verification for Grant Award S184M140126

This is to inform you of the payee for the above listed grant award issued by the United States Department of Education

Grantee DUNS/SSN: 076554500

Grantee Name: OAKLAND UNIFIED SCHOOL DISTRICT

Payee DUNS/SSN: 076554500

Payee Name: OAKLAND UNIFIED SCHOOL DISTRICT

If any of the above information is not correct, please contact a Payee Customer Support Representative at 1-888-336-8930. Please send all the correspondence relating to the payee or bank information changes to the following address:

U.S. Department of Education  
550 12th Street, SW  
Room 6087  
Washington, DC 20202

Attn: Stephanie Barnes  
Phone: 202-245-8006

**SPECIAL GRANT CONDITIONS FOR PAYMENTS**

**THE G5 PAYMENTS MODULE**

Payments under this award will be made through the G5-Payments module of, the U.S. Department of Education's (Department) electronic payments.. The G5paymentmodule and other web-based grant systems (e-Application, e-Reader, e-Reports,) (modules) within the Education Central Automated Processing Systems (EDCAPS) are administered by the Office of the Chief Information Officer, Financial Systems Services.

The internet address for G5 is <https://www.g5.gov>. To access the G5 Payments module, you must first have a G5 User Id and Password. You'll need to request a G5 User Id and Password from the Department of Education by submitting an **External Access Security Form**. This form is electronically available during online registration under "*Not Registered? Sign Up*", when you access the website. The Department will issue G5 User Ids and Passwords to those individuals authorized by the payee to access G5 to request funds and report expenditures. User Ids and Passwords cannot be faxed or given over the phone, and may not be shared by multiple users. The External User Access Request Form must be completed and mailed to the following address:

U.S. Department of Education  
Office of the Chief Information Officer  
Mail Stop – 4110  
Attn: G5 Functional Application Team  
400 Maryland Avenue, SW  
Washington, DC 20202

New grantees will be requested to provide pertinent information before they may begin requesting funds. Information to be provided includes:

- Designation of payee
- Payee contacts and mailing addresses
- Depositor account information
- Individuals authorized by the payee to access G5 to request funds - these individuals will be provided User Ids and passwords to access G5

The payee is the entity identified by the grantee to handle the financial aspects of the grant – e.g., request payments, report expenditures (the grantee and payee may be the same entity). Payees may begin requesting funds for the grantee once their award authorization is entered into G5 and the award start date is reached.

A copy of the Department of Education G5 Training Guide (*Guide*), is available on the G5 website under "Help". The guide provides detailed instructions on all electronic payment processes. If you are not Internet capable, please contact the G5/GAPS Payee Hotline at toll free 1 (888) 336-8930 to request a hard copy of the Guide.



### REQUESTING FUNDS USING THE G5 MODULE

Payees can access the G5-Payments Module on-line to request funds. To access, payees need a Web browser (such as Microsoft Internet Explorer or Netscape Navigator) and Internet connectivity. Payees will request funds by award using **the PR/Award Number** found in

**Block 5** of the **Grant Award Notification**. Instructions for navigating through the G5-Payments screens to make a payment request are given in the G5 Training Guide and the G5 OnDemand training located under "Help". Instructions for modifying payment requests, adjusting drawdown amounts, and viewing award and authorization histories are also included in the Guide.

Those payees who do not have the technology to access G5-Payments on-line may request funds by calling ED's G5/GAPS Payee Hotline by calling 1-888-336-8930.

### AWARD INFORMATION

Payees can get information on this award (1) on-line or (2) by calling ED's G5/GAPS Payee Hotline Staff at 1-888-336-8930.

#### ➤ On-Line:

Payees may access G5 via the Internet (<https://www.G5.gov>) to retrieve and view information on their awards, such as:

- Net authorization and authorization history
- Net draws
- Available balance
- History of pending and completed payments
- Award status
- Award history - including detailed transactions on drawdowns, returns, refunds, and adjustments

#### ➤ ED's GAPS Payee Hotline Staff:

Payees can contact a G5/GAPS Payee Hotline Staff for information on any award. Because award information is organized in G5 by a unique identifier - the Dun & Bradstreet Number (DUNS Number) - payees should have their DUNS number, identified in **Block 8** of the **Grant Award Notification**, available when contacting a G5/GAPS Payee Hotline Staff Representative.

### FINANCIAL REPORTS:

When a Payee requests a drawdown of funds by grant award, the Department records this as an expenditure against the specific grant award. This method of identifying expenditures, at the time of drawdown, and the capability to make adjustments on-line eliminates the need for the submission of the Federal Cash Transactions Report Form 272. Therefore, no additional financial reporting will be required unless required by a specific program.

**An Overview of Single Audit Requirements of States,  
Local Governments, and Non-Profit Organizations**

To meet audit requirements of U.S. Office of Management and Budget (OMB) Circular A-133, grantees must use the version published by OMB in the Federal Register on June 30, 1997 (62 F.R. 35278) amended June 27, 2003 (68.F.R. 38401). Grantees must submit all documents required by OMB Circular A-133, including Form SF-SAC: Data Collection Form, to:

Federal Audit Clearinghouse  
1201 East 10th Street  
Jeffersonville, Indiana 47132  
(301) 763-1551 (voice)  
(800) 253-0696 (toll free)  
(301) 457-1540 (fax)

Below is a summary of the single audit requirements:

- (1) Non-Federal entities that expend \$500,000 or more in a year in Federal Awards are required to have a single audit conducted for that year except when they elect under paragraph (2) to have a program specific audit conducted for that year (A-133 § \_\_.200 (a & b)).
- (2) When an auditee expends Federal awards under only one Federal program (excluding R&D) and the Federal programs laws, regulations, or grant agreements do not require a financial statement audit of the auditee, the auditee may elect to have a program-specific audit conducted. A program-specific audit may not be elected for R&D unless all of the Federal awards expended were received from the same Federal agency, or the same Federal agency and the same pass-through entity, and that Federal agency, or pass-through entity in the case of a subrecipient, approves in advance a program-specific audit (A-133 § \_\_.200 (c)).
- (3) Non-Federal entities that expend less than \$500,000 a year in Federal awards are exempt from Federal audit requirements under A-133 for that year, except where noted in the circular, but records must be available for review or audit by the appropriate officials of the Federal agency, pass-through entity, and General Accounting Office (GAO). If a program statute requires audits of grants under that program, either at a lower threshold or in all cases, grantees must comply with the program statute (A-133 § \_\_.200 (d)).
- (4) A grantee must submit the audit results to the audit clearinghouse within the earlier of 30 days after the receipt of the auditors report(s), or within nine months after end of the audit period, unless a longer period is agreed to in advance by the Federal agency that provided the funding or a different period is specified in a program-specific audit guide (A-133 § \_\_.320 (a)).

Grantees are strongly urged to obtain the "OMB Circular A-133 Compliance Supplement" and to contact their cognizant agency for single audit technical assistance.

The designated cognizant agency for single audit purposes is "the Federal awarding agency that provides the predominant amount of direct funding to the recipient." Grantees should obtain a copy of the OMB Circular A-133 Compliance supplement. This supplement will be instructive to both grantees and their auditors. Appendix III of the supplement provides a list of Federal Agency Contacts for A-133 Audits, including addresses, phone numbers, fax numbers, and e-mail addresses for technical assistance.

If the U.S. Department of Education is the cognizant agency, grantees should contact the Non-Federal Audit Team in the Departments Office of Inspector General, at the address, phone, or fax number provided in page 2 of this attachment.



Grantees can obtain information on single audits from:

The OMB Publications Service, (202) 395-7332. (To obtain OMB Circular A-133, Circular A-133 Compliance Supplement, and Form SF-SAC: Data Collection Form)

The OMB web site. Look under OMB Documents, then OMB Circulars. (To obtain OMB Circular A-133, Circular A-133 Compliance Supplement, and Form SF-SAC: Data Collection Form)

The Federal Audit Clearinghouse, 1-888-222-9907. (to obtain Form SF-SAC: Data Collection Form), or The American Institute of Certified Public Accountants (AICPA). AICPA has illustrative OMB Circular A-133 report examples that might be of interest to accountants, auditors, or financial staff. The examples can be obtained by their fax hotline: (202) 938-3797, request document number 311; or from their Internet page. The Internet address is <http://www.aicpa>.

If the U.S. Department of Education is the cognizant agency for the grantee organization, the following chart shows, according to the location of the grantee entity, which location of the Office of Inspector General to contact for single audit-related questions. For programmatic questions, grantees should contact the Education Program Contact shown on the Departments Grant Award Notification

U.S. Department of Education Non-Federal Audit Teams

Director, Non-Federal Audits  
Office of Inspector General  
U.S. Department of Education  
Wanamaker Building  
100 Penn Square East., Suite 502  
Philadelphia, PA 19107  
Phone: Voice (215) 656-6900

FAX (215) 656-6397 NATIONAL OFFICE CONTACT and audits in Connecticut, Delaware, District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia, West Virginia, Puerto Rico, and the Virgin Islands.

National Office Contact

Web page:  
Non-Federal Audit Team  
Office of Inspector General  
U.S. Department of Education  
1999 Bryan St., Suite 2630  
Dallas, TX 75201-6817  
Phone: Voice (214) 880-3031

FAX (214) 880-2492 For audits in Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, New Mexico, North Carolina, Oklahoma, South Carolina, Tennessee, and Texas.

Non-Federal Audit Team  
Office of Inspector General  
U.S. Department of Education  
8930 Ward Parkway, Suite 2401  
Kansas City, MO 64114-3302  
Phone: Voice (816) 268-0502

FAX (816) 823-1398 For audits in Alaska, Arizona, California, Colorado, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Montana, Nebraska, Nevada, North Dakota, Ohio, Oregon, South Dakota, Utah, Washington, Wisconsin, Wyoming, and the Pacific Islands.

## ENCLOSURE1

TO: Project Directors and Fiscal Management Staff for ED  
Discretionary Grants

FROM: Philip A. Maestri  
Director, Risk Management Service

SUBJECT: Key Financial Management Requirements for Discretionary  
Grants Awarded by the Department of Education (ED)

As part of the Department's on-going efforts to make you aware of your responsibilities associated with managing Federal funds, I am writing to remind you of important financial management requirements that apply to discretionary grant awards.

In general, the Department expects that you will administer ED grants in accordance with generally accepted business practices, exercising prudent judgment so as to maintain proper stewardship of taxpayer dollars. This includes using fiscal control and fund accounting procedures that insure proper disbursement of and accounting for Federal funds. In addition, you may use grant funds only for obligations incurred during the funding period.

The Education Department General Administrative Regulations (EDGAR) contain the general requirements for administering discretionary grants made by this Department. The most recent version of the regulations [34 CFR 74-99] may be accessed at the website the Government Printing Office (GPO) has established for the Code of Federal Regulations (CFR), at the following URL:

[http://www.access.gpo.gov/nara/cfr/waisidx\\_08/34cfrv1\\_08.html](http://www.access.gpo.gov/nara/cfr/waisidx_08/34cfrv1_08.html)

Please note that this URL shows ALL the parts associated with Volume One of 34 CFR. EDGAR is comprised ONLY of Parts 74 - 99. In addition, the following link to the Federal Register issue of December 7, 2007, contains a final regulation that modified certain sections of Part 75 (Direct Grants) regarding indirect cost rates:

<http://edocket.access.gpo.gov/2007/pdf/E7-23817.pdf>

The attached document, "Selected Topics in Administering ED Discretionary Grants," highlights major administrative requirements of EDGAR in parts 74 and 80. Part 74 applies to institutions of higher education, non-profit organizations, and hospitals. Part 80 applies to States, local governments, and federally recognized Indian tribal governments. In addition, a few of the topics discuss requirements that this Department imposes on its discretionary grantees under Part 75. The specific sections of EDGAR that address the topics discussed are shown in parentheses. I urge you to read the full text of these and other topics in EDGAR.



Please keep in mind that a particular grant might be subject to additional requirements of the authorizing statute for the program that awarded the grant and/or any regulations issued by the program office. You should become familiar with those requirements as well, because program-specific requirements might differ from those in EDGAR.

In closing, I recommend that the project director and the fiscal management staff of a grantee organization communicate frequently with each other about the grant budget. Doing so will help to assure that you use Federal funds only for those expenditures associated with activities that conform to the goals and objectives approved for the project.

You should direct any questions you might have about the topics discussed in the attached document or about any other aspect of administering your grant award to the ED program staff person named in Block 3 of the Grant Award Notification.

Attachment

## Selected Topics in Administering ED Discretionary Grants

### **I. Financial Management Systems (§74.21, §80.20)**

In general, grantees are required to have financial management systems that:

- \* provide for accurate, current, and complete disclosure of results regarding the use of funds under grant projects;
- \* provide adequate source documentation for Federal and non-Federal funds used under grant projects;
- \* contain procedures to determine the allowability, allocability, and reasonableness of obligations and expenditures made by the grantee; and
- \* enable the grantee to maintain effective internal control and fund accountability procedures, e.g., requiring separation of functions so that the person who makes obligations for the grantee is not the same person who signs the checks to disburse the funds for those obligations.

State systems must account for funds in accordance with State laws and procedures that apply to the expenditure of and the accounting for a State's own funds. A State's procedures, as well as those of its subrecipients and cost-type contractors, must be sufficient to permit the preparation of reports that may be required under the award as well as provide the tracing of expenditures to a level adequate to establish that award funds have not been used in violation of any applicable statutory restrictions or prohibitions.

### **II. Payment (§74.22, 80.21)**

Under parts 74 and 80,--

- \* the Department pays grantees in advance of their expenditures if the grantee demonstrates a willingness and ability to minimize the time between the transfer of funds to the grantee and the disbursement of the funds by the grantee;
- \* grantees repay to the Federal government interest earned on advances; and
- \* grantees subject to Part 74 deposit grant funds in interest-bearing accounts (grantees subject to part 80 are encouraged to also deposit grant funds in interest-bearing accounts).

In general, grantees should make payment requests frequently, only for small amounts sufficient to meet the cash needs of the immediate future.

The Department has recently encountered situations where grantees failed to request funds until long after the grantee actually expended its own funds for the costs of its



grant. Grantees need to be aware that, by law, Federal funds are available for grantees to draw down for only a limited period of time, after which the funds revert to the U.S. Treasury. In some cases grantees have requested funds too late for the Department to be able to pay the grantees for legitimate costs incurred during their project periods. The Department urges financial managers to regularly monitor requests for payment under their grants to assure that Federal funds are drawn from the ED G5 Payment System at the time those funds are needed for payments to vendors and employees.

### **III. Personnel (§§74.27, 75.511-75.519 and 80.22)**

The rules in Part 75 cover issues such as paying consultants with grant funds, waiving the requirement for a full-time project director, making changes in key project staff, and prohibiting dual compensation of staff. General rules governing reimbursement of salaries and compensation for staff working on grant projects are addressed in the cost principles located in Title 2 of the Code of Federal Regulations (2 CFR) (See **Cost Principles**, below). In all cases, payments of any type to personnel must be supported by complete and accurate records of employee time and effort. For those employees that work on multiple functions or separately funded programs or projects, the grantee must also maintain time distribution records to support the allocation of employee salaries among each function and separately funded program or project.

### **IV. Cost Principles (§74.27, §80.22)**

All costs incurred under any grant are subject to cost principles found in 2 CFR that are applicable to particular types of organizations that serve as grantees under Federal grant programs. The applicable cost principles provide lists of selected items of allowable and unallowable costs, and can be found on the Web at the following URLs:\*)

2 CFR, Part 220 - Cost Principles for Educational Institutions (relocated to 2 CFR, Part 220 from **OMB Circular A-21**):

[http://www.whitehouse.gov/omb/fedreg/2005/083105\\_a21.pdf](http://www.whitehouse.gov/omb/fedreg/2005/083105_a21.pdf)

2 CFR, Part 225 - Cost Principles for State, Local and Indian Tribal Governments (relocated to 2 CFR, Part 225 from **OMB Circular A-87**):

[http://www.whitehouse.gov/omb/fedreg/2005/083105\\_a87.pdf](http://www.whitehouse.gov/omb/fedreg/2005/083105_a87.pdf)

2 CFR, Part 230 - Cost Principles for Non-Profit Organizations (relocated to 2 CFR, Part 230 from **OMB Circular A-122**):

[http://www.whitehouse.gov/omb/fedreg/2005/083105\\_a122.pdf](http://www.whitehouse.gov/omb/fedreg/2005/083105_a122.pdf)

## **V. Procurement Standards (§§74.40-48, §80.36)**

Under §80.36, States are required to follow the procurement rules the States have established for purchases funded by non-Federal sources. Under both parts 74 and 80, when procuring goods and services for a grant purposes, all other grantees may follow their own procurement procedures, but only to the extent that those procedures meet the minimum requirements for procurement specified in the regulations. These requirements include written competition procedures and codes of conduct for grantee staff, as well as requirements for cost and price analysis, record-keeping and contractor compliance with certain Federal laws and regulations. These regulations also require grantees to include certain conditions in contracts and subcontracts, as mandated by the regulations and statutes.

## **VI. Indirect Costs (§§75.560-564)**

A. A grantee must have a current indirect cost rate agreement to charge indirect costs to a grant. However, if a grantee does not have a federally recognized indirect cost rate agreement on the date ED awards its grant, ED generally will authorize the grantee to use a temporary rate, of 10% of budgeted salaries and wages subject to the following limitations:

1. The grantee must submit an indirect cost proposal to its cognizant agency within 90 days after ED issues the GAN.
  - i. The cognizant agency is generally the Federal department or agency providing the grantee with the most direct Federal funding subject to indirect cost support (or an agency otherwise designated by OMB).
  - ii. If an organization receives most of its Federal funding indirectly as a sub-recipient via another entity (for example, a State Education Agency [SEA]), the conduit organization that provides the most pass-through Federal funding is responsible for establishing indirect cost rates for the sub-recipient.
2. If after the 90-day period, the grantee has not submitted an indirect cost proposal to its cognizant agency, the grantee may not charge its grant for indirect costs until it has negotiated an indirect cost rate agreement with its cognizant agency. However, under exceptional circumstances, ED may allow the grantee to continue using the temporary indirect cost after the end of the 90-day period even though the grantee did not submit an indirect cost proposal within the 90-day period. Before ED approves continued use of the temporary rate, the grantee must provide documentation satisfactory to ED that exceptional circumstances exist.
3. Once a grantee that has used a temporary rate obtains a federally recognized cost rate, the grantee may use the federally recognized rate to claim indirect costs reimbursement. The recovery is subject to the following limitations:
  - i. The grantee may only recover indirect costs incurred on or after the date it submitted its indirect cost rate proposal to its cognizant agency or at the start of the of the project period, whichever of the two occurs later.



- ii. The total amount of funds recovered by the grantee under the federally recognized indirect cost rate is reduced by the amount of indirect costs previously recovered under the temporary indirect cost rate on or after the date specified in subparagraph 3 (i).
- iii. The grantee must obtain prior approval from the Secretary to shift direct costs to indirect costs in order to recover indirect costs at a higher negotiated indirect cost rate.
- iv. The grantee may not request additional funds to recover indirect costs that it cannot recover by shifting direct costs to indirect costs.

4. If an organization receives a combination of direct Federal funding and pass-through funding as a sub-recipient, and the entity does not have a rate established by some other cognizant agency, the Federal agency providing the most direct funding (or otherwise designated by OMB) is the cognizant agency for cost negotiation.

The only exceptions to the general rules about which agency is the cognizant agency for a grantee are indirect cost negotiations with institutions of higher education that are subject to 2 CFR, Part 220, G.11.a., "Cognizant agency assignments" (relocated to 2 CFR, Part 220 from OMB circular A-21, "Cognizant agency assignments").

B. ED imposes limitations on indirect cost rates for certain types of grants, depending on the nature of the grant or the program under which the grant was funded. For example, grantees in specific programs with legislation containing "supplement-not-supplant" provisions are subject to a "restricted" indirect cost rate. Restricted indirect cost rates are lower than the negotiated indirect cost rates because the restricted rate excludes certain general management and fixed costs that would otherwise be included in the standard indirect cost rate calculation. Sections 75.563 and 76.564-569 in EDGAR describe how to calculate restricted rates in more detail. The ED program officer for any grant program can verify whether that program is covered by restricted rate requirements. See Attachment D of this GAN for more specific information.

C. Section 75.562 of EDGAR limits the indirect cost rate to 8% for training grants, regardless of the rate negotiated with the cognizant agency. (This 8% limitation does not apply to federally recognized Indian tribes or agencies of States or local governments.) The difference between the 8% limit and the grantee's negotiated rate may not be used for cost sharing or matching purposes, charged to direct cost categories, or charged to another Federal award.

D. Some programs contain prohibitions against recovery of any indirect costs. Under grants received from one of these programs, a grantee may not charge to a direct cost category in its budget a cost that would be treated as an indirect cost in other situations, nor may those unrecovered indirect costs be charged to other Federal awards.

E. In connection with reporting indirect costs under a grant, grantees will need to review the cover sheet of the ED Grant Performance Report (ED 524B). The section, "Indirect Costs," contains four questions related to claiming indirect costs under a grant.

Grantee personnel should be sure to answer these questions accurately so that the Department can exercise properly its responsibility for fiscal oversight of its grant awards.

More extensive discussion of indirect cost rates and their relationship to ED grants can be found on the website of the Office of the Chief Financial Officer (OCFO) at:

<http://www.ed.gov/about/offices/list/ocfo/fipao/icgindex.html>

## **VII. Audit Requirements (§74.26, §80.26)**

The Single Audit Act requires that grantees obtain a non-Federal audit of their expenditures under their Federal grants if the grantee expends more than \$500,000 in Federal funds in one fiscal year. OMB Circular A-133 contains the requirements imposed on grantees for audits done in connection with the law. The full text of the most recent version of the circular can be found at:

<http://www.whitehouse.gov/omb/circulars/a133/a133.html>

The Department recommends hiring auditors who have specific experience in auditing Federal awards under the circular and the Compliance Supplement, which can be found at:

[http://www.whitehouse.gov/omb/circulars/a133\\_compliance/01/01toc.html](http://www.whitehouse.gov/omb/circulars/a133_compliance/01/01toc.html)

## **OTHER CONSIDERATIONS**

Some other topics of financial management covered in EDGAR that might affect particular grants include program income (§§74.24, 80.25), cost sharing or matching (§§74.23, 80.24), property management requirements for equipment and other capital expenditures (§§74.34, 80.32).

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\*) Those who have difficulty accessing these Web pages directly may go to the main Web page (<http://www.whitehouse.gov/omb/circulars/>) for all OMB circulars, listed in numerical sequence, and use the links shown to access a particular circular.



**UNITED STATES DEPARTMENT OF EDUCATION**  
*Office of the Chief Financial Officer*

**MEMORANDUM to ED DISCRETIONARY GRANTEES**

You are receiving this memorandum to remind you of Federal requirements, found in Parts 74 and 80 of the Education Department General Administrative Regulations (EDGAR), regarding cash drawdowns under your grant account.

For any cash that you draw from your Department of Education grant account, you must:

- draw down only as much cash as is necessary to meet the immediate needs of the grant project;
- keep to the minimum the time between drawing down the funds and paying them out for grant activities; and
- return to the Government the interest earned on grant funds deposited in interest-bearing bank accounts except for a small amount of interest earned each year that your entity is allowed to keep to reimburse itself for administrative expenses).

In order to meet these requirements, you are urged to:

- take into account the need to coordinate the timing of drawdowns with prior internal clearances (e.g., by boards, directors, or other officials) when projecting immediate cash needs so that funds drawn down from ED do not stay in a bank account for extended periods of time while waiting for approval;
- monitor the fiscal activity (drawdowns and payments) under your grant on a continuous basis;
- plan carefully for cash flow in your grant project during the budget period and review project cash requirements before each drawdown; and
- pay out grant funds for project activities as soon as it is practical to do so after receiving cash from the Department.

Keep in mind that the Department monitors cash drawdown activity for all grants on a weekly basis. Department staff will contact grantees who appear to have drawn down excessive amounts of cash under one or more grants during the fiscal quarter to discuss the particular situation. For the purposes of drawdown monitoring, the Department will contact grantees who have drawn down 50% or more of the grant in the first quarter, 80% or more in the second quarter, and/or 100% of the cash in the third quarter of the budget period. However, even amounts less than these thresholds could still represent excessive drawdowns for your particular grant activities in any particular quarter. Grantees determined to have drawn down excessive cash will be required to return the excess funds to the Department, along with any associated earned interest, until such time as the money is legitimately needed to pay for grant activities. If you need assistance with returning funds and interest, please contact ED's G5/GAPS Payee Hotline by calling 1-888-336-8930.

Grantees that do not follow Federal cash management requirements and/or consistently appear on the Department's reports of excessive drawdowns could be:

- designated "high-risk" grantees [EDGAR 74.14, 80.12], which could mean being placed on a "cash-reimbursement" payment method (i.e., a grantee would experience the inconvenience of having to pay for grant activities with its own money and waiting to be reimbursed by the Department afterwards);
- subject to further corrective action;
- denied selection for funding on future ED grant applications [EDGAR 75.217(d)(3)(ii)]; and/or
- debarred or suspended from receiving future Federal awards from any executive agency of the Federal government.

Depending on which type of entity your organization is, you are urged to read either §74.22 or §80.21 of EDGAR to learn more about Federal requirements related to grant payments. If you are a state or local educational agency with a grant covered by Part 80, please check with the ED staff person named in Block 3 of your Grant Award Notification to determine how to apply these requirements to any subgrantees. You are urged to make copies of this memorandum and share it with all affected individuals within your organization.

# MEMORANDUM

ENCLOSURE 4  
June 15, 2010

To: Recipients of grants and cooperative agreements

From: Thomas Skelly, Delegated to Perform Functions of Chief Financial Officer

Subject: Department of Education Cash Management Policies for Grants and Cooperative Agreements

The purpose of this memorandum is to remind the Department of Education's (the Department's) grant and cooperative agreement recipients (recipients) of existing cash management requirements regarding payments. The Department expects that recipients will ensure that subrecipients are also aware of these policies by forwarding a copy of this memorandum to them.

There are two different sets of payment requirements that apply to the draw of funds from recipient accounts at the Department. Payments to a State under programs covered by a State's Treasury State Agreement (TSA) are subject to the requirements of the *Cash Management Improvement Act of 1990 (CMIA)* as published in 31 United States Code 6503.

All other payments to States and all payments to other types of recipients are subject to the requirements in either 34 Code of Federal Regulation (CFR) Part 74, applicable to nongovernmental entities, or 34 CFR Part 80, applicable to State, local, and Indian tribal governments. These regulations are part of the Education Department General Administrative Regulations (EDGAR) and are available on the Web at [http://www.access.gpo.gov/nara/cfr/waisidx\\_08/34cfrv1\\_08.html](http://www.access.gpo.gov/nara/cfr/waisidx_08/34cfrv1_08.html).

## CMIA Requirements

States that draw funds under programs subject to the *CMIA* must draw funds as required under the TSA for the State. If a State draws funds under one of these programs to make payments to a subrecipient, the payment request to the Department should only be made at the request of the subrecipient, which must make draw requests to the State as required under the requirements in EDGAR, as described below.

## EDGAR Requirements

Payments to States under programs not covered by the State's TSA and payments to other governments are subject to the requirements in Part 80 of EDGAR. These payment requirements also apply to all other types of recipients under Part 74 of EDGAR, which applies to nonprofit organizations, institutions of higher education, hospitals, and commercial organizations. States that draw funds on behalf of subrecipients under programs not covered by a TSA should remind subrecipients that they may only request funds from the State under the payment standards in Part 74 or Part 80, as applicable.

For any cash drawn from your program or project account at the Department:

- Recipients must minimize the time between the recipient's draw down of funds from its grant account at the Department and the time the recipient disburses those funds to payees via



electronic transfer, check redemption or other means of transfer. See 34 CFR 74.22(a) and 80.21(b). Specifically, recipients may only draw funds to meet the immediate cash needs of the grant or cooperative agreement.

- For recipients subject to Part 74 of EDGAR, unless the conditions described in 34 CFR Part 74 Section 22(k) exist, these recipients must deposit advances of Federal funds in interest bearing accounts.
- Recipients subject to Part 74 of EDGAR must return to the U.S. Department of Health and Human Services (HHS) the interest earned on advances of grant funds except that the recipient may retain up to \$250 of interest earned on the account each year to pay for the costs of maintaining the account. These requirements also apply to subrecipients subject to Part 74 Section 22 (l) which requires these recipients and subrecipients to annually remit interest earned on advances of funds. The address for interest remittances to HHS is:

U.S. Department of Health and Human Services  
P.O. Box 6120  
Suite 1133  
Rockville, MD 20852

The remittance should be accompanied by a letter stating that the remittance is for “interest earned on Federal funds” and should include the DUNS number.

- Recipients subject to Part 80 of EDGAR must return to the Department the interest earned on advances of grant funds except that the recipient may retain up to \$100 of interest earned on the account each year to pay for the costs of maintaining the account. Section 80.21(i) requires these recipients to promptly (at least quarterly) remit interest earned on advances to the Department. These requirements also apply to subrecipients subject to Part 80. The address for interest remittances to the Department is:

U.S. Department of Education  
P.O. Box 979053  
St. Louis, MO 63197-9000

The remittance should be accompanied by a letter stating that the remittance is for “interest earned on Federal funds” and should include the DUNS number.

- Recipients must use grant funds only for obligations incurred during the funding period.
- Recipients must distribute Federal funds to subrecipients only when requested by the subrecipient and as needed to pay program costs.

Recipients have other responsibilities regarding the use of Federal funds. We highlight the following practices related to the draw of Federal funds that are either required by EDGAR or will assist recipients in meeting their responsibilities under EDGAR.

- Recipients must regularly monitor the payment requests made by their subrecipients to ensure that those requests conform to the same payment requirements that apply to the recipient. See 34 CFR Part 80 Section 20(b)(7);
- Recipients must regularly monitor the fiscal activity of their subrecipients on a continuous basis and ensure that their subrecipients return interest earned;
- If expenditures under the program or project require the recipient's board or specified officials to approve expenditures, the recipient should obtain that approval before making the payment request for any expenditure, thus minimizing the period of time that funds remain in the recipient's bank account pending disbursement of the funds for expenditures under the program or project. See 34 CFR 74.21(b)(5) and 80.22(a); and
- Plan carefully for cash flows for your grant project and review projected cash requirements before each drawdown. See 34 CFR 74.21 and 74.22 or 80.20 and 80.21, as applicable.

Recipients that do not follow the cash management requirements applicable to their grants could be:

- Placed on a "cash-reimbursement" payment method, i.e., a recipient would have to pay for grant activities with its own money and submit documentation of the expenditures to the Department before receiving reimbursement from the Department;
- Designated a "high-risk" recipient under 34 CFR 74.14 or 80.12, as applicable, which may involve the imposition of conditions in addition to that of being placed on a reimbursement payment system;
- Subjected to further corrective action, including withholding of funds, suspension, and termination of the award. See 34 CFR 74.62 or 80.43, as applicable;
- Denied funding under future Department discretionary grant competitions. See 34 CFR Part 75 Section 217(d)(3)(ii); and
- Debarred or suspended under 34 CFR Part 85 from receiving future Federal awards from any executive agency of the Federal government.

A small number of ED grant programs have program-specific cash management and payment requirements based on the authorizing legislation or program regulations. These program-specific requirements may supplement or override the general EDGAR cash management or payment requirements. If you have any questions about your specific grant, please contact the program officer, whose contact information is on your Grant Award Notification (GAN).

ED's Office of the Chief Financial Officer will provide ongoing outreach efforts regarding cash management and payment requirements, including supplementary webinars, URL links and Frequently Asked Question sheets.

Thank you for your attention to this matter. If you have any questions, please contact Cynthia Heath at (202) 245-8043 or [cynthia.heath@ed.gov](mailto:cynthia.heath@ed.gov)



**Recipients of ED Grants and Cooperative Agreements  
Frequently Asked Questions**

**Q What are the Federal Laws and Regulations on cash management?**

**A** The *Cash Management Improvement Act of 1990 (CMIA)* is the overriding public law for cash management. It was enacted by Public Law 101-453, 31 U.S.C. 3335 and 6503. The implementing regulations are in Title 31 of the Code of Federal Regulations (CFR), Part 205, <http://www.fms.treas.gov/fedreg/31cfr205final.pdf>. In addition, the Education Department General Administrative Regulations (EDGAR) defines the CFR specific to administering the U.S. Department of Education's (the Department's) grants in 34 CFR, Part 74 and Part 80, [http://www.access.gpo.gov/nara/cfr/waisidx\\_08/34cfrv1\\_08.html](http://www.access.gpo.gov/nara/cfr/waisidx_08/34cfrv1_08.html).

**Q What are the CMIA requirements?**

**A** States that draw funds under programs subject to the *CMIA* must draw funds as required under the Treasury-State Agreement (TSA) for the State. If a State draws funds under one of these programs to make payments to a subrecipient, the payment request to the Department should only be made at the request of the subrecipient, which must make draw requests to the State as required under the requirements in EDGAR.

**Q What are the Education Department General Administrative Regulations (EDGAR) requirements?**

**A** Payments to States and other governments under programs not covered by the State's TSA and payments to other governments are subject to the requirements in Part 80 of EDGAR. These payment requirements also apply to all other types of recipients under Part 74 of EDGAR, which applies to nonprofit organizations, institutions of higher education, hospitals, and commercial organizations. States that draw funds on behalf of subrecipients under programs not covered by a TSA should remind subrecipients that they may only request funds from the State under the payment standards in Part 74 or Part 80, as applicable. The EDGAR is available on the Web at [http://www.access.gpo.gov/nara/cfr/waisidx\\_08/34cfrv1\\_08.html](http://www.access.gpo.gov/nara/cfr/waisidx_08/34cfrv1_08.html).

**Q What is a Treasury-State Agreement (TSA)?**

**A** A TSA documents the accepted funding techniques and methods for calculating interest agreed upon by the U.S. Department of the Treasury (Treasury) and a State. It also identifies the Federal assistance programs. The *CMIA*'s implementing regulations at 31 CFR 205 will govern if there are any inconsistencies. A TSA will be effective until terminated, unless Treasury and a State agree to a specific termination date. Treasury or a State may terminate a TSA with 30 days written notice.

**Q What if there is no TSA?**

**A** When a State does not have a TSA in effect, default procedures will be prescribed to implement 34 CFR, subpart A. The default procedures will prescribe efficient funds transfer procedures consistent with State and Federal law and identify the covered Federal assistance programs and designated funding techniques. When the Department and a State reach agreement on some but not all Federal assistance programs administered by the State, the Department and the State may enter into a TSA for all programs on which we are in agreement and we may prescribe default procedures governing those programs on which we are unable to reach agreement.

**Q What is a Federal-State Agreement?**

**A** A Federal-State Agreement is an agreement between a State and a Federal Program Agency specifying terms and conditions for carrying out a Federal assistance program or group of programs. This is different from a TSA.



**Q Who is responsible for Cash Management?**

**A** The Department's grant and cooperative agreement recipients (recipients) are charged with the administration of Federal funds. In addition, recipients are responsible for ensuring that subrecipients are aware of cash management policies. For more information, see the recently issued Memorandum from the Chief Financial Officer on Cash Management which is posted on the ed.gov "ED Memoranda to Grantees" page at <http://www2.ed.gov/policy/fund/guid/gposbul/gposbul.html>.

**Q Who is responsible for monitoring cash drawdowns to ensure compliance with cash management policies?**

**A** Recipients must monitor their cash drawdowns **and** their subrecipients to assure substantial compliance to the standards of timing and amount of advances. Additionally, when considered necessary and feasible by the Federal agency, recipients may be required to report the amount of cash advances in excess of three days' needs in their hands **and** of their subrecipients and to provide short narrative explanations of actions taken by the recipient to reduce the excess balances.

**Q How soon may I draw down funds from the G5 grants management system (G5 replaced E-Payments in December 2007)?**

**A** Grantees are required to minimize the amount of time between the drawdown and the use of funds from their bank accounts. (See EDGAR §74.21-22 and §80.20-21.) Funds must be drawn only to meet a grantee's immediate cash needs for each individual grant. Each time you use the G5 system to draw down a payment you check a box certifying that you are adhering to cash management requirements and that the funds will be spent within 3 days. The G5 screen displays the following message: *I certify, by processing this payment request and/or re-allocation, that the funds are being expended within three business days of receipt for the purpose and condition of the agreement.*

**Q How may I use Federal funds?**

**A** Federal funds must be used as specified in the Grant Award Notification (GAN).

**Q What if I used Federal funds for other than the specific purpose for which it was given?**

**A** This will be deemed a disallowed expenditure, and funds (including any earned interest) must be returned to the Department.

**Q What are excess cash balances?**

**A** Excess cash balances are funds maintained at the recipient/subrecipient's level in excess of immediate (usually 3 days) needs. Excess cash balances must be promptly withdrawn from account and returned to the Department.

**Q What are the consequences to recipients/subrecipients for not complying with terms of the grant award?**

**A** If a recipient or subrecipient materially fails to comply with any term of an award, whether stated in a Federal statute or regulation, EDGAR, an assurance, a cooperative agreement, a TSA, an application, a notice of award, or elsewhere, the awarding agency may take one or more of the following actions:

- (1) Temporarily withhold cash payments pending correction of the deficiency by the recipient or subrecipient or more severe enforcement action by the awarding agency,
- (2) Disallow (that is, deny both use of funds and matching credit for) all or part of the cost of the activity or action not in compliance,
- (3) Wholly or partly suspend or terminate the current award for the recipient's or subrecipient's program,
- (4) Withhold further awards for the program, or
- (5) Take other remedies that may be legally available.



**Q Who is responsible for determining the amount of interest owed to the Department?**

**A** As set forth in 31 CFR 205.9, a TSA must include the method a State uses to calculate and document interest liabilities. A State must calculate and report interest liabilities on the basis of its fiscal year. A State must ensure that its interest calculations are auditable and retain a record of the calculations. A non-State entity must keep track of any interest earned on Federal funds and promptly remit it to the government. Also, see the June 15, 2010, memorandum from the Department's Chief Financial Officer on *Department of Education Cash Management Policies for Grants and Cooperative Agreements* posted at <http://www2.ed.gov/policy/fund/guid/gposbul/gposbul.html>.

**Q How is interest earned on Federal funds calculated?**

**A** If you earn interest on Federal funds, you must return the actual amount earned to the Department. If the disbursement arrangement is subject to a TSA, then the recipient must adhere to the interest calculation method specified in the TSA. Recipients that are not subject to a TSA (non-TSA recipients), along with subrecipients, must return actual interest earned on cash balances to the Department.

In some cases, non-TSA recipients or subrecipients may not be able to readily identify the actual amount and must calculate the interest earned on Federal cash balances. For these cases, here are some guiding principles for non-TSA recipients and subrecipients to consider when performing interest calculations:

- Non-TSA recipients and subrecipients should calculate interest earned on Federal cash balances using the same method that was used to determine their interest earnings on cash balances from all sources. For example, Federal interest should be calculated using the average daily balance method if this method was used to calculate interest on Federal and non-Federal cash balances (all sources).
- Federal interest should be calculated using the same interest rate at which the non-TSA recipient or subrecipient earned interest on cash balances from all sources. Because interest earned on Federal cash balances must be calculated and remitted quarterly, the rate used in these calculations should be the applicable rate for that quarter.
- The amount of interest earnings remitted to the Department should not be reduced in order to compensate for the temporary use of other non-Federal cash resources to pay Federal program costs. This is true whether the non-TSA recipient or subrecipient normally receives Federal funds through an advance or reimbursement funding method.

**Q May we keep interest earned on Federal funds?**

**A** A recipient/subrecipient subject to EDGAR 34 CFR Part 74 may keep up to \$250/year of interest earned on excess Federal fund advances to cover administrative costs. All other amounts must be returned to the Department of Health and Human Services.

A recipient/subrecipient subject to EDGAR 34 Part 80 may keep up to \$100/year of interest earned on excess Federal fund advances to cover administrative costs. All other amounts must be returned to the Department of Education.

**Q Where should I return interest earned on Federal funds?**

**A** Recipients subject to Part 74 of EDGAR must return to the U.S. Department of Health and Human Services (HHS) the interest earned on advances of grant funds except that the recipient may retain up to \$250 of interest earned on the account each year to pay for the costs of maintaining the account. These requirements also apply to subrecipients subject to Part 74 Section 22 (I), which requires these recipients and subrecipients to annually remit interest earned on advances of funds. The address for interest remittances to HHS is:

U.S. Department of Health and Human Services

P.O. Box 6120, Suite 1133  
Rockville, MD 20852

Recipients subject to Part 80 of EDGAR must return to the Department the interest earned on advances of grant funds except that the recipient may retain up to \$100 of interest earned on the account each year to pay for the costs of maintaining the account. Section 80.21(i) requires these recipients to promptly (at least quarterly) remit interest earned on advances to the Department. These requirements also apply to subrecipients subject to Part 80. The address for interest remittances to the Department is:

U.S. Department of Education  
P.O. Box 979053  
St. Louis, MO 63197-9000

**Q What information should accompany my interest payment?**

A Recipient/subrecipient should note their DUNS number as well as any other identifiable information specific to the award and the recipient/subrecipient.

**Q Are grant recipients/subrecipients automatically permitted to draw funds in advance of the time they need to disburse funds in order to liquidate obligations?**

A No. Section 80.21 of the EDGAR prescribes several methods a recipient may use to make payments to subrecipients. The State educational agency as the recipient, however, has the authority to determine which method it will use to make payments to its subrecipients within the State.

**Q For formula grant programs such as ESEA Title I, for which States distribute funds to LEAs, may States choose to pay LEAs on a reimbursement basis?**

A Yes. Section 80.21 of the EDGAR authorizes States to implement a payment system in which LEAs are reimbursed monthly; quarterly; or, in some cases, semi-annually. A reimbursement process is a State choice and not mandated by ED. Section 80.21 of EDGAR also allows recipients and subrecipients to be paid in advance, provided they maintain or demonstrate the willingness and ability to maintain procedures to minimize the time elapsing between the transfer of the funds and their disbursement by the recipient or subrecipient.

**Q What are the exceptions to adhering to cash management requirements?**

A A small number of ED grant programs have program-specific cash management and payment requirements based on the authorizing legislation or program regulations. These program-specific requirements may supplement or override the general EDGAR cash management or payment requirements. If you have any questions about your specific grant, please contact the program officer, whose contact information is on your Grant Award Notification (GAN).

**Q Will the Department issue special procedures in advance if G5 plans to shut down for 3 days or more?**

A Yes, the Department will issue special guidance for drawing down funds during a G5 shut down period of 3 days or more. The guidance will include cash management improvement act procedures for States and certain State institutions of higher education and procedures for grants (including Pell grants) that are not subject to CMIA. Early notice is provided to all grantees to plan accordingly.



## EDGAR Advisory to Grantees

The Education Department General Administrative Regulations (EDGAR) are a compilation of regulations applicable to ED grantees, composed of Parts 74-99 of Title 34 in the U.S. Government's Code of Federal Regulations (CFR). The CD-ROM of EDGAR distributed with Grant Award Notifications since early 2009 contains the version of Part 99 [Family Educational Rights and Privacy] issued by the Department in December 2008, as well as nonprocurement debarment and suspension regulations at Part 85, issued in 2003.

Last year, the Department published a revised version of Part 99, containing numerous amendments and updates, which was effective on January 3, 2012. The revised Part 99 will be formally codified in the CFR in the last half of 2012. In the meantime, grantees are directed to the version of the revised Part 99 that can currently be found online at the Government Printing Office's e-CFR website. The e-CFR is a regularly updated, unofficial, non-legal edition of the CFR, created in partnership with the Office of the Federal Register.

In addition, the Department revised its regulations for nonprocurement debarment and suspension in March, 2012. This revision removed Part 85 from EDGAR and relocated the nonprocurement debarment and suspension regulations to another Title of the CFR, specifically 2 CFR 3485.

The Department's website contains links to the e-CFR version of the revised EDGAR Part 99, all the other parts of EDGAR, and the new 2 CFR 3485 at:

<http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>

Grantees wishing to review the background and discussion of the changes made to in the revised Part 99 can find a link for the Department's *Federal Register* issuing notice on at the same web page. The *Federal Register* notice updates the previous notice shown in Appendix B on the EDGAR CD-ROM and contains the name and contact information for the ED staff member who can respond to inquiries about the revised Part 99.

The web page also contains a link to the *Federal Register* notice that issued the new nonprocurement debarment and suspension regulations at 2 CFR 3485.

**UNITED STATES DEPARTMENT OF EDUCATION**  
*Office of the Chief Financial Officer*

**MEMORANDUM to ED GRANTEES REGARDING THE USE OF GRANT FUNDS FOR CONFERENCES AND MEETINGS**

You are receiving this memorandum to remind you that grantees must take into account the following factors when considering the use of grant funds for conferences and meetings:

- Before deciding to use grant funds to attend or host a meeting or conference, a grantee should:
  - Ensure that attending or hosting a conference or meeting is consistent with its approved application and is reasonable and necessary to achieve the goals and objectives of the grant;
  - Ensure that the primary purpose of the meeting or conference is to disseminate technical information, (e.g., provide information on specific programmatic requirements, best practices in a particular field, or theoretical, empirical, or methodological advances made in a particular field; conduct training or professional development; plan/coordinate the work being done under the grant); and
  - Consider whether there are more effective or efficient alternatives that can accomplish the desired results at a lower cost, for example, using webinars or video conferencing.
- Grantees must follow all applicable statutory and regulatory requirements in determining whether costs are reasonable and necessary, especially the Cost Principles for Federal grants set out at 2 CFR Part 225 (OMB Circular A-87, State, Local, and Indian Tribal Governments), (<http://www.gpo.gov/fdsys/pkg/CFR-2011-title2-vol1/xml/CFR-2011-title2-vol1-part225.xml>); 2 CFR Part 220 (OMB Circular A-21, Educational Institutions), (<http://www.gpo.gov/fdsys/pkg/CFR-2011-title2-vol1/xml/CFR-2011-title2-vol1-part220.xml>); and 2 CFR 230 (OMB Circular A-122, Non-Profit Organizations) (<http://www.gpo.gov/fdsys/pkg/CFR-2011-title2-vol1/xml/CFR-2011-title2-vol1-part230.xml>). In particular, remember that:
  - Federal grant funds cannot be used to pay for alcoholic beverages; and
  - Federal grant funds cannot be used to pay for entertainment, which includes costs for amusement, diversion, and social activities.
- Grant funds may be used to pay for the costs of attending a conference. Specifically, Federal grant funds may be used to pay for conference fees and travel expenses (transportation, per diem, and lodging) of grantee employees, consultants, or experts to attend a conference or meeting if those expenses are reasonable and necessary to achieve the purposes of the grant.
  - When planning to use grant funds for attending a meeting or conference, grantees should consider how many people should attend the meeting or conference on their behalf. The number of attendees should be reasonable and necessary to accomplish the goals and objectives of the grant.
- A grantee hosting a meeting or conference may not use grant funds to pay for food for conference attendees unless doing so is necessary to accomplish legitimate meeting or conference business.
  - A working lunch is an example of a cost for food that might be allowable under a Federal grant if attendance at the lunch is needed to ensure the full participation by conference attendees in essential discussions and speeches concerning the purpose of the conference and to achieve the goals and objectives of the project.



**UNITED STATES DEPARTMENT OF EDUCATION**  
*Office of the Chief Financial Officer*

- A meeting or conference hosted by a grantee and charged to a Department grant must not be promoted as a U.S. Department of Education conference. This means that the seal of the U.S. Department of Education must not be used on conference materials or signage without Department approval.
  - All meeting or conference materials paid for with grant funds must include appropriate disclaimers, such as the following:

The contents of this (insert type of publication; e.g., book, report, film) were developed under a grant from the Department of Education. However, those contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.
- Grantees are strongly encouraged to contact their project officer with any questions or concerns about whether using grant funds for a meeting or conference is allowable prior to committing grant funds for such purposes.
  - A short conversation could help avoid a costly and embarrassing mistake.
- Grantees are responsible for the proper use of their grant awards and may have to repay funds to the Department if they violate the rules on the use of grant funds, including the rules for meeting- and conference-related expenses.

June 2012

## Attachment F

### Request for Approval of Program Income

In projects that generate program income <sup>10)</sup>, the recipient calculates the amount of program income according to the guidance given in:

- 34 CFR 74.20(f) [institutions of higher education, nonprofit organizations, and hospitals];  
or
- 34 CFR 80.25(c) [State and local governments and Federally recognized Indian tribes].

**\*\*\* IF YOU RECEIVED YOUR GRANT AWARD NOTIFICATION ELECTRONICALLY AND YOU ARE SUBJECT TO ANY OF THE RESTRICTIONS IDENTIFIED BELOW, THE RESTRICTION(S) WILL APPEAR IN BOX 10 ON YOUR GRANT AWARD NOTIFICATION AS A GRANT TERM OR CONDITION OF THE AWARD. \*\*\***

Unless checked below as NOT ALLOWED, the recipient may exercise any of the options or combination of options, as provided in EDGAR <sup>11)</sup>, for using program income generated in the course of the recipient's authorized project activities:

- Not Allowed Adding program income to funds committed to the project by the Secretary and recipient and using it to further eligible project or program objectives;
- Not Allowed Using program income to finance the non-Federal share of the project or program; and
- Not Allowed Deducting program income from the total project or program allowable cost in determining the net allowable costs on which the Federal share of costs is based.

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<sup>10)</sup> As defined in §74.2 and §80.25(b) of the Education Department General Administrative Regulations (EDGAR)

<sup>11)</sup> 34 CFR 74.24(a)-(h) [Institutions of higher education, nonprofit organizations, and hospitals]; or  
34 CFR 80.25(a)-(h) [State and local governments and Federally-recognized Indian tribes]



**Trafficking in Persons**

The Department of Education adopts the requirements in the Code of Federal Regulations at 2 CFR 175 and incorporates those requirements into this grant through this condition. The grant condition specified in 2 CFR 175.15(b) is incorporated into this grant with the following changes. Paragraphs a.2.ii.B and b.2.ii. are revised to read as follows:

"a.2.ii.B. Imputed to you or the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 34 CFR part 85."

"b.2.ii. Imputed to the subrecipient using the standards and due process for imputing the conduct of an individual to an organization that are provided in 34 CFR part 85."

Under this condition, the Secretary may terminate this grant without penalty for any violation of these provisions by the grantee, its employees, or its subrecipients.

## Reporting Prime Awardee Executive Compensation Data

The Federal Funding Accountability and Transparency Act (FFATA) is designed to increase transparency and improve the public's access to Federal government information. To this end, FFATA requires that executive compensation data be reported for all new Federal grants funded at \$25,000 or more with an award date on or after October 1, 2010. As such, grants awarded by the U.S. Department of Education are required to report executive compensation data as addressed in this grant award term:

**a. Reporting Total Compensation of Recipient Executives:**

**1. *Applicability and what to report.*** You must report total compensation for each of your five most highly compensated executives for the preceding completed fiscal year, if—

i. the total Federal funding authorized to date under this award is \$25,000 or more;

ii. in the preceding fiscal year, you received--

(A) 80 percent or more of your annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and

(B) \$25,000,000 or more in annual gross revenues from Federal procurement contracts (and subcontracts) and Federal financial assistance subject to the Transparency Act, as defined at 2 CFR 170.320 (and subawards); and

iii. The public does not have access to information about the compensation of the executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. (To determine if the public has access to the compensation information, see the U.S. Security and Exchange Commission total compensation filings at <http://www.sec.gov/answers/execomp.htm>.)

**2. *Where and when to report.*** You must report executive total compensation described in paragraph b.1. of this award term as part of your System for Award Management (SAM) registration profile at <http://www.sam.gov>.

**A.** If this is the first award you have received that is subject to the reporting requirements in paragraph b.1., you must report by the end of the month following the month in which this award is made, and on each anniversary of this award.

**B.** If you have already received an award this year that is subject to the reporting requirements in paragraph b.1., you must report executive compensation on the anniversary of the first award you received that was subject to the reporting requirement in paragraph b.1. of this condition.

**b. Definitions. For purposes of this award term:**



1. **Entity** means all of the following, as defined in 2 CFR part 25:

- i. A Governmental organization, which is a State, local government, or Indian tribe;
- ii. A foreign public entity;
- iii. A domestic or foreign nonprofit organization;
- iv. A domestic or foreign for-profit organization;
- v. A Federal agency, but only as a subrecipient under an award or subaward to a non-Federal entity.

2. **Executive** means officers, managing partners, or any other employees in management positions.

3. **Total compensation** means the cash and noncash dollar value earned by the executive during the recipient's or subrecipient's preceding fiscal year and includes the following (for more information see 17 CFR 229.402(c)(2)):

- i. Salary and bonus.
- ii. Awards of stock, stock options, and stock appreciation rights. Use the dollar amount recognized for financial statement reporting purposes with respect to the fiscal year in accordance with the Statement of Financial Accounting Standards No. 123 (Revised 2004) (FAS 123R), Shared Based Payments.
- iii. Earnings for services under non-equity incentive plans. This does not include group life, health, hospitalization or medical reimbursement plans that do not discriminate in favor of executives, and are available generally to all salaried employees.
- iv. Change in pension value. This is the change in present value of defined benefit and actuarial pension plans.
- v. Above-market earnings on deferred compensation which is not tax-qualified.
- vi. Other compensation, if the aggregate value of all such other compensation (e.g. severance, termination payments, value of life insurance paid on behalf of the employee, perquisites or property) for the executive exceeds \$10,000.

7/2012

**SPECIAL CONDITIONS FOR DISCLOSING  
FEDERAL FUNDING IN PUBLIC ANNOUNCEMENTS**

When issuing statements, press releases, requests for proposals, bid solicitations and other documents describing projects or programs funded in whole or in part with Federal money, U.S. Department of Education grantees shall clearly state —

- 1) the percentage of the total costs of the program or project which will be financed with Federal money;
- 2) the dollar amount of Federal funds for the project or program; and
- 3) percentage and dollar amount of the total costs of the project or program that will be financed by non-governmental sources.

Recipients must comply with these conditions under Division H, Title V, Section 505 of Public Law 113-76, Consolidated Appropriations Act, 2014.



## ATTACHMENT U

### **PROHIBITION OF TEXT MESSAGING AND EMAILING WHILE DRIVING DURING OFFICIAL FEDERAL GRANT BUSINESS**

Federal grant recipients, sub recipients and their grant personnel are prohibited from text messaging while driving a government owned vehicle, or while driving their own privately owned vehicle during official grant business, or from using government supplied electronic equipment to text message or email when driving.

Recipients must comply with these conditions under Executive Order 13513, "Federal Leadership On Reducing Text Messaging While Driving," October 1, 2009.

12/09

## ATTACHMENT V

### **Registration of Data Universal Numbering System (DUNS) Number and Taxpayer Identification Number (TIN) in the System for Award Management (SAM)**

The U.S. Department of Education (Education) Grants Management System (G5) will begin disbursing payments via the U.S. Department of Treasury (Treasury) rather than directly through the Federal Reserve as in the past. The U.S. Treasury requires that we include your Tax Payer Identification Number (TIN) with each payment. Therefore, in order to do business with Education you must have a registered DUNS and TIN number with the SAM, the U.S. Federal Government's primary registrant database. If the payee DUNS number is different than your grantee DUNS number, both numbers must be registered in the SAM. Failure to do so will delay the receipt of payments from Education.

A TIN is an identification number used by the Internal Revenue Service (IRS) in the administration of tax laws. It is issued either by the Social Security Administration (SSA) or by the IRS. A Social Security number (SSN) is issued by the SSA whereas all other TINs are issued by the IRS.

The following are all considered TINs according to the IRS.

- Social Security Number "SSN"
- Employer Identification Number "EIN"
- Individual Taxpayer Identification Number "ITIN"
- Taxpayer Identification Number for Pending U.S. Adoptions "ATIN"
- Preparer Taxpayer Identification Number "PTIN"

If your DUNS number is not currently registered with the SAM, you can easily register by going to [www.sam.gov](http://www.sam.gov). Please allow 3-5 business days to complete the registration process. If you need a new TIN, please allow 2-5 weeks for your TIN to become active. If you need assistance during the registration process, you may contact the SAM Federal Service Desk at 866-606-8220.

If you are currently registered with SAM, you may not have to make any changes. However, please take the time to validate that the TIN associated with your DUNS is correct.

If you have any questions or concerns, please contact the G5 Hotline at 888-336-8930.



## **System for Award Management and Universal Identifier Requirements**

### **A. Requirement for System for Award Management (SAM)**

Unless you are exempted from this requirement under 2 CFR 25.110, you as the recipient must maintain the currency of your information in the SAM until you submit the final financial report required under this award or receive the final payment, whichever is later. This requires that you review and update the information at least annually after the initial registration, and more frequently if required by changes in your information or another award term.

### **B. Requirement for Data Universal Numbering System (DUNS) Numbers**

If you are authorized to make subawards under this award, you:

1. Must notify potential subrecipients that no entity (see definition in paragraph C of this award term) may receive a subaward from you unless the entity has provided its DUNS number to you.
2. May not make a subaward to an entity unless the entity has provided its DUNS number to you.

### **C. Definitions**

For purposes of this award term:

1. System for Award Management (SAM) means the Federal repository into which an entity must provide information required for the conduct of business as a recipient. Additional information about registration procedures may be found at the SAM Internet site (currently at <http://www.sam.gov>).
2. Data Universal Numbering System (DUNS) number means the nine-digit number established and assigned by Dun and Bradstreet, Inc. (D&B) to uniquely identify business entities. A DUNS number may be obtained from D&B by telephone (currently 866-705-5711) or the Internet (currently at <http://fedgov.dnb.com/webform>).
3. Entity, as it is used in this award term, means all of the following, as defined at 2 CFR part 25, subpart C:
  - a. A Governmental organization, which is a State, local government, or Indian Tribe;
  - b. A foreign public entity;
  - c. A domestic or foreign nonprofit organization;
  - d. A domestic or foreign for-profit organization; and
  - e. A Federal agency, but only as a subrecipient under an award or subaward to a non-Federal entity.
4. Subaward:
  - a. This term means a legal instrument to provide support for the performance of any portion of the substantive project or program for which you received this award and that you as the recipient award to an eligible subrecipient.
  - b. The term does not include your procurement of property and services needed to carry out the project or program (for further explanation, see Sec. 11.210 of the attachment to OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations").
  - c. A subaward may be provided through any legal agreement, including an agreement that you consider a contract.
5. Subrecipient means an entity that:
  - a. Receives a subaward from you under this award; and
  - b. Is accountable to you for the use of the Federal funds provided by the subaward.

# (PPG) Project Prevent Grant

## Budget Narrative

### 1. Personnel

**.10 FTE OUSD Director of Behavioral Initiatives, Department of Family, Schools, and Community Partnerships) Barbara McClung will dedicate 10% of her time to oversight of the project.** She leads implementation of Positive Behavioral Intervention Supports (PBIS), restorative justice, school-based behavioral health services, violence prevention programs, and all other district-wide behavioral health initiatives. She brings her past experience as a director of youth and adult programs, clinical supervisor and mental health therapist within the juvenile justice system to this role. Ms McClung will supervise the program manager and participate in budget development and program evaluation and reporting to ensure that the project is administered according to the proposed grant priorities.

*\$10,500 per year for five years.*

*Total: \$52,500*

**1.0FTE Project Manager (PM) will be hired to manage the projects day-to-day implementation and will report to the Director.** The PM will contract and collaborate with the HEARTS trainer, and the evaluator; contract with restorative justice coordinators and community-based agencies providing school based mental health services for uninsured students at each of the six schools; be responsible for data collection on project implementations and outcomes; budget management; and provide reporting to the grantor.

*\$80,000 per year for five years.*

*Total: \$400,000*

**Teacher Stipends** — Stipends for teachers and other certificated staff attending Restorative Justice and Trauma Informed Practices Trainings that take place outside of regular hours.

*Calculation: 50 teachers @\$22.90 per hour x 8 hours x two days training annually =*

*\$18,320 per year for five years.*

*Total: 91,600*

*Annual Personnel: \$108,820*

**Total Personnel: \$544,100**

In addition, OUSD will provide a full-time **Restorative Justice Specialist** with district funds to provide follow-up training and coaching support to teachers at the six target schools; monitor implementation of trauma-informed restorative classroom practices; work with restorative justice coordinators to develop criteria for selecting and training peer mediators; and be responsible for the data collection on Restorative Justice circles and conflict mediation/resolution implementation and outcomes.

### 2. Fringe/Benefits

Including medical, retirement, worker's comp, etc.

*Calculation: 40% x Salaries of the Director and the Program Manager = \$36,200 per year for five years.*



*Calculation: 18% x hourly stipends = \$3,298 per year for five years.*

*Annual Benefits: \$39,498*

**Total Fringe/Benefits: \$197,490**

### **3. Travel**

Three staff to attend the National Restorative Justice and/or Trauma Conference annually.

*Calculation: 3 persons x \$980 airfare + \$40 per diem x 3 days + \$200 hotel x 2 nights = \$4,500 per year per year for five years*

**Total Travel: \$22,500**

### **4. Equipment**

Laptops and printer(s) for 8 social workers and 1 program manager.

*One-time expense of \$9,000 in first year.*

**Total Equipment: \$9,000**

### **5. Supplies**

Binders and other training materials (\$1,000 per year).

Refreshments for school staff trainings (\$5,000 per year).

*\$6,000 per year.*

**Total Supplies: \$30,000**

### **6. Consultants/Contracts**

Evaluation conducted by West Ed.

*\$60,000 per year*

Healthy Environments and Response to Trauma in Schools (HEARTS), University of California, San Francisco Trauma Trainer/Technical Assistance Provider (Dr. Joyce Durado).

*\$35,000 per year*

Increase hours of six existing contractual school based Restorative Justice Coordinators, from half time to full time.

*\$150,000 per year*

Trauma-Informed Mental Health Services, 250 hours at each site, \$100 per hour.

*\$150,000 per year*

*Annual Total \$395,000*

**Total Consultants/Contracts: \$1,975,000**

	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>	<b>TOTAL</b>
<b>9. Total Direct Costs</b>	562,818	553,818	553,818	553,818	553,818	<b>2,778,090</b>
<b>10. Indirect Costs</b> <i>Indirect Cost Rate</i> 5.94%	33,431	32,897	32,897	32,897	32,897	<b>165,019</b>
<b>11. Training Stipends</b>	-	-	-	-	-	-
<b>12. Total Costs</b>	596,249	586,714	586,714	586,714	586,714	<b>2,943,109</b>



## Project Prevent Grant (PPG)

	Year One	Year Two	Year Three	Year Four	Year Five
<b>Expense</b>					
<b>1. Personnel</b>					
<b>Salaried Personnel</b>					
1.0FTE Program Manager	80,000	80,000	80,000	80,000	80,000
.1 FTE Director	10,500	10,500	10,500	10,500	10,500
<b>Hourly Personnel</b>					
<b>Subtotal Personnel</b>	90500	90500	90500	90500	90500
<b>2. Fringe/Benefits</b>					
Fringe/Benefits - Salaried 40%	36200	36200	36200	36200	36200
Other Benefit Rate					
<b>Subtotal Fringe/Benefits</b>	36200	36200	36200	36200	36200
<b>3. Travel</b>					
3 staff to attend the National RJ and/or Trauma Conference annually	4500	4500	4500	4500	4500
<b>Subtotal Travel</b>	4500	4500	4500	4500	4500
<b>4. Equipment</b>					
Laptop and printer for each social worker and the program manager	9000				
<b>Subtotal Equipment</b>	9000	0	0	0	0
<b>5. Supplies</b>					
Materials - Binders and other training materials	1000	1000	1000	1000	1000
Refreshments - for trainings of school staff annually	5000	5000	5000	5000	5000
<b>Subtotal Supplies</b>	6000	6000	6000	6000	6000
<b>6. Consultants/Contracts</b>					
Evaluation (10% of total) West Ed	60,000	60,000	60,000	60,000	60,000
HEARTS/UCSF Trauma Trainer/TA Provider (Jc	35,000	35,000	35,000	35,000	35,000
.5 FTE RJ coordinator	150,000	150,000	150,000	150,000	150,000
250 hours of Trauma informed MH services at each site x 100/hr x 6 schools	150,000	150,000	150,000	150,000	150,000
<b>Subtotal Consultants/Contracts</b>	395000	395000	395000	395000	395000
<b>7. Construction</b>					
None					
<b>Subtotal Construction</b>	0	0	0	0	0
<b>8. Other</b>					

*Stipends for teachers and other certificated staff attending RJ and Trauma Informed Practices Trainings 100 teachers @ \$22.90 x 8 hours x 50 teachers x two days training annually*

18,320 18,320 18,320 18,320 18,320

**Subtotal Other**

18320 18320 18320 18320 18320

**9. Total Direct Costs**

559520 550520 550520 550520 550520

**10. Indirect Costs**

Indirect Cost Rate 5.94% (set by state, April 17, 2014)

33235.49 32700.89 32700.89 32700.89 32700.89

**11. Training Stipends**

**12. Total Costs**

592755.5 583220.9 583220.9 583220.9 583220.9

*Maximum Allowed (sometimes helps to keep this at botttom)*



## **Project Narrative**

### **Need for Project**

Oakland Unified School District (OUSD) is a comprehensive, urban school district serving 37,040 students in Oakland, CA. Located in the county of Alameda, CA, the city of Oakland remains one of the more violent cities in the country ranking second in CQ Press' crime-level ranking of large cities nationwide (CQPress, 2014). High levels of poverty, community violence and trauma exposure are distressingly commonplace in the city and certain neighborhoods surrounding schools. According to recent congressional briefings by the CDC director of the division of violence prevention, youth living in inner cities show a higher prevalence of post-traumatic stress syndrome (PTSD) than soldiers due to "living in combat zones" where exposure to violence may be prolonged and repeated in multiple environments (i.e., home, school, and community; Spivak, 2012). Research over the past two decades shows that children's traumatic experiences can result in difficulty regulating emotions, including poor impulse control, aggression against self and others, trouble interpreting emotional signals, chronic uncertainty about the reliability of other people, and a lack of a predictable sense of self (Lubit, et al., 2003; De Bellis, 2005; Pelcovitz, et al., 2004). Exposure to violence is also associated with higher suspension and expulsion rates, and lower school attendance and grades for students (Wong, 2006), with related effects of stress, burnout and vicarious trauma among school staff (Jennings, et al, 2013).

While OUSD has long-standing partnerships with the County of Alameda, the City of Oakland, and a large consortium of community mental health agencies to provide school based mental health services and address violence, a trauma-informed, prevention-oriented systemic approach that integrates mental health services, restorative practices and training is needed to

effectively meet the needs of students directly, or indirectly, exposed to pervasive violence. In particular, this is true for the six comprehensive high schools (Castlemont, Fremont, McClymonds, Oakland, Oakland Tech, and Skyline High Schools) listed in this application as the sites for this effort.

**Magnitude of Need**

**Evidence of Need: High Levels of Poverty and Violence.** The wellbeing of youth is profoundly affected by economic living conditions; the association between poverty and school success is well documented in the research literature (Coleman et al., 1966; Duncan & Murnane, 2011). According to U.S. Census figures, about one-third of all children under the age of 18 in Oakland (32.6%) live in poverty, nearly twice as many as in neighboring Alameda county (17.4%) and higher than the one-quarter statewide (23.8%; [www.kidsdata.org](http://www.kidsdata.org), 6/23/2014). According to analyses on youth indicators affecting the healthy development of Oakland’s children and youth (Oakland Fund for Children and Youth, 2012), this represents an increase of over 30% in just three years and the highest percentage of children living in poverty in the Bay Area.

In Oakland schools, nearly three-quarters of students (73.1%) were eligible for free or reduced-price lunch (FRDL) as compared to 44.2% for Alameda County and

Castlemont	84%
Fremont	88%
McClymonds	100%
Oakland	83%
Oakland Tech	51%
Skyline	68%

58% statewide in the 2012-2013 academic year (<http://data1.cde.ca.gov/dataquest/>, 6/23/2014). Four of the six high schools targeted for this effort are above the OUSD district average; at one of these schools all students qualify for FRDL (Table 1). All schools meet the criteria for high-poverty schools, thereby qualifying this application for *competitive preference priority one*.



Youths' exposure to community violence is associated with an increase in aggressive behavior and depression, lower self-esteem, and higher anxiety (Gorman-Smith and Tolan, 1998). A recent report on the health of Alameda County and its cities (Alameda County Public Health Department, 2010) indicated that homicides rates in Oakland (25.5 per 100,000) were 2.4 times higher than the Alameda County rate of 10.7 per 100,000 – and both were higher than the rates for California and nationwide (6.3 and 6.1 per 100,000, respectively). In Alameda County and Oakland in particular, homicide continues to be the leading cause of death for youth ages 15-24, while for the same age group in California overall unintentional injuries (accidents) are the leading cause of death (retrieved from [www.kidsdata.org](http://www.kidsdata.org) on 6/24/2014). Analyses of these data for youth found a large proportion of the homicides among youth in Alameda County occurred in the city of Oakland, where the rate of homicide among young African American males (186 per 100,000) was 20 times higher than the rate for all other youth in the county (9 per 100,000) (Alameda County Public Health Department, 2006).

Similarly, in Alameda County there were 15,089 Emergency Department visits for assault-related injuries (328.6 per 100,000) with Oakland having the highest rate (581.4 per 100,000) of cities in county. Data by age group and gender indicate youth ages 15-24 have the highest rates of assault

**Table 2. Weapon Related Violence for Target Schools**

CHKS Data 2013-2014 Grade→	Carried a gun		Carried any other weapon		Threatened or injured w/ weapon	
	9 <sup>th</sup>	11 <sup>th</sup>	9 <sup>th</sup>	11 <sup>th</sup>	9 <sup>th</sup>	11 <sup>th</sup>
Castlemont	11%	14%	11%	10%	17%	13%
Fremont	4%	6%	9%	12%	8%	7%
McClymonds	6%	11%	10%	11%	13%	5%
Oakland	5%	4%	10%	9%	7%	6%
Oakland Tech	5%	3%	9%	6%	7%	5%
Skyline	7%	9%	5%	5%	8%	11%

related injuries, where rates for males are nearly twice as high as rates for females. California Healthy Kids Survey (CHKS) data for 2008-2010 indicate about one in ten 9<sup>th</sup> and 11<sup>th</sup> grade

students report carrying a gun to school, nearly twice the state average (Table 2). As the more recent data (CHKS 2013-14) for the target high schools suggests, this appears to be decreasing for some of the target high schools. Yet the number of students reporting being threatened or injured by a weapon on school property is distressingly high for some of the target schools.

Exposure to violence may also result in juvenile justice system involvement (Nofziger & Kurtz, 2005). Oakland youth comprise a large proportion of those detained at the Alameda County Juvenile Justice Center (JJC). According to a recent report, 906 Oakland juveniles were detained at the JJC in fiscal year 2010-2011, comprising 44% of the JJC population (OFCY, 2012). Similarly, although Oakland youth represent less than one quarter of the overall youth population in Alameda County, Oakland youth comprise 48.6% of the daily average population (220 youth) of the JJC. Youth of color in Oakland are also disproportionately affected; African American (56%) and Latino (27%) youth comprise more than three-quarters of all cases in the Alameda County juvenile justice system (Alameda County Probation Department, 2013).

In their partnership with Alameda County Probation funded by the City of Oakland under Measure Y – the Violence Prevention and Public Safety Act of 2004 – OUSD operates a Juvenile Justice Transition Center which focuses on case management, mentoring and advocacy for youth leaving the Alameda County Juvenile Justice Center (JJC) and reconnecting with OUSD or other educational institutions and meeting the terms of their probation. Students referred through the JJC Transition Center receive intensive individualized services and supports including mental health, medical, and employment assistance to address root causes of violence and crime related behavior. A total of 497 students received comprehensive re-entry support through the transition center in 2013. Gang activity also strongly affects crime and violence in Oakland communities and among its youth. According to a study by Braga (2010), about 78 known gangs operate in



Oakland with an estimated 3,800 gang members. Of the 125 Oakland homicides in 2008, Braga found that 49 (39.2%) were gang related killings, with many others linked to turf- or drug-related conflicts that may also be gang-related. CHKS data for 2008-2010 on self-reported gang

Grade	Region	Percentage
9	OUSD	12.4%
	Alameda County	8.6%
	State	8.2%
11	OUSD	8.8%
	Alameda County	7.9%
	State	8.2%

membership (see table 3) show higher percentages for students in Oakland than in the county and statewide, and are higher in every racial category for Oakland youth in grades 9 and 11, ranging from 6% for Asian and White students to 20% for Native American students.<sup>1</sup> According to 2013-2014 HKS data (see Table 4), self-reported gang membership varies considerably across the six high schools; the highest self-reported gang membership is at McClymonds High where one in five students report they currently belong to a gang.

Youth in Oakland are also affected directly by child abuse and indirectly through witnessing domestic violence. Children who witness domestic violence are at greater risk for anxiety, depression, fighting, bullying, poor school performance, and perpetrating

	9 <sup>th</sup>	11 <sup>th</sup>
Castlemont High	17%	10%
Fremont High	11%	6%
McClymonds High	19%	19%
Oakland High	5%	7%
Oakland Tech High	10%	5%
Skyline High	5%	5%

violence (Stiles, 2002). While many incidents of domestic violence are never reported, 6,644 domestic violence-related calls for assistance were reported in Alameda County in 2012. Of these, more than half (3,593 or 54.1 %) were reported to the Oakland police (Criminal Justice Statistics Center website, <http://oag.ca.gov/crime/cjsc/stats/domestic-violence>, 6/23/2014). Yet Oakland residents comprise just a quarter (25.8%) of the county's population according to U.S. Census data for 2010 (<http://www.bayareacensus.ca.gov>, 6/24/2014).

<sup>1</sup> Source data for table X, [www.kidsdata.org](http://www.kidsdata.org), 6/23/2014.

Exposure to abuse is strongly related to a number of risk factors, including alcoholism, drug abuse, depression and suicide (Center For Disease Control (CDC) Adverse Childhood Experiences (ACEs) study, <http://www.cdc.gov/ace/index.htm>). In studies of juvenile offenders, over 90% of juvenile detainees reported having experienced physical abuse, sexual abuse, domestic violence, community violence and/or other violence-related disasters (Ford et al., 2007). Rates of substantiated child abuse have decreased in Alameda County over the period 2006-2010 from 5.6 per to 2.8 per 1,000. This is considerably lower than the rate statewide which fell from 11 per 1,000 in 2006 to 9 per 1,000 in 2010. However, African Americans have disproportionately higher rates than other ethnic groups in the county. In 2009, rates of allegations of child maltreatment in this group were three times higher than the county average (93.4 versus 31.1 per 1,000) while substantiations of child maltreatment were almost four times higher (163 versus 4.7 per 1,000) (Applied Survey Research, 2011).

***Evidence of need: high suspensions, expulsions, and discipline referrals.*** Exposure to violence creates barriers to learning, including behavioral problems that may result in suspensions and expulsions (Song, et al, 1998; Kennedy and Bennett, 2006; Wong, 2006). Symptoms of trauma that may show up in schools include poor regulation and avoidance or aggression responses to triggering stimuli (e.g., harsh or disciplinary tone of voice). In Oakland, while out-of-school suspensions are decreasing, rates of suspension are still higher than the county and state rates (see table 5). In the 2013-2014 school year, of the 3, 214 out-of-school suspensions, nearly half (45%) were related to violence (e.g., for injury, willful use of force, sexual assault or hate violence) followed by disruptive behaviors such as defiance (24%) and

<b>HKS08-10</b>	<b>Suspensions</b>	<b>Expulsions</b>
OUSD	6%	0.1%
County	4.4%	0.1%
State	5.1%	0.1%



obscenity (9%). Suspensions for drugs (7%) and weapons possession (3%) comprised smaller percentages.

Expulsions are increasingly rare in Oakland and the rest of the state as schools and districts find alternatives to expulsion. In Oakland, in the 2013-2014 school year, 134 students were referred to expulsion hearings, but only 15 students were actually expelled. The remaining 101 students were involuntarily transferred to another school as an alternative to expulsion, facing “re-entry” issues similar to students returning to school from the juvenile justice system. Across the six comprehensive high schools targeted for this intervention, there were only seven expulsions in the 2013-2014 school year.

Data on suspensions and expulsions in the identified high schools (2013-14 school year) are shown in

Table 6. Of note, among the 671 students who received suspensions in the past school year in the target high schools,

<b>Table 6. Poverty &amp; Violence Indicators for Target Schools</b>	<b>Castlemont</b>	<b>Fremont</b>	<b>McClymonds</b>	<b>Oakland</b>	<b>Oakland Tech</b>	<b>Skyline</b>
<b>Enrollment 2013-2014</b>	594	760	241	1559	1874	1633
<b>Suspensions<sup>2</sup></b>						
Total suspension incidents	296	176	129	234	152	288
# incidents for violence	87	82	48	122	46	19
% incidents for violence	29	47%	37%	52%	30%	7%
# students suspended	149	125	72	158	103	167
% of students suspended	25	16%	30%	10.0%	5.2%	10%
Suspension rate change	↑	↓	↑	↓	↓	↓
<b>Expulsions<sup>3</sup></b>						
# students referred for expulsion	12	27	5	25	1	14
# students transferred involuntarily	17	8	6	13	0	9

there are a number of students who have been suspended more than once. Analysis of suspension

<sup>2</sup> OUSD Data, Out of School Suspension Incidents – By School Type, August 26 2013 to June 12, 2014.

<sup>3</sup> OUSD data,

rates (e.g., students suspended as proportion of enrollment) over a three-year period indicate suspensions have declined in two schools and increased in two schools.

A valid system for monitoring and using data on office discipline referrals (ODRs) is being piloted this year and will be implemented district-wide in Fall 2014. Use of a uniform process, protocol and progress monitoring system will allow schools to better identify, serve and track the progress of students who exhibit violence or trauma related behaviors (e.g., students repeatedly suspended or referred for disciplinary issues).

**Evidence of need: perceived low safety and support in school environments.** With the multiple and chronic challenges students and communities face, many OUSD schools struggle to create safe and supportive learning environments. Student perceptions of safety in their school from the CHKS data indicate that while perceptions of safety have improved, the proportion of students who report feeling safe or very safe at their school is still considerably lower than the state averages at both grades 9 and 11 (see table 7).

CHKS Data		2008-10	2011 <sup>4</sup>
9 <sup>th</sup>	OUSD	44.4%	51%
	County	58%	n/a
	State	58.1%	60%
11 <sup>th</sup>	OUSD	39%	48%
	County	58.2%	n/a
	State	62.1%	63%

Recent data (CHKS 2013-14) for the six target high schools (see table 8) suggest that less than half of students at each high school feel safe or very safe. Of particular concern are results for older students. Although they are more familiar with the school environment and their classmates than freshman, who are just transitioning to high school, they

HKS Data 2013-14	9 <sup>th</sup>	11 <sup>th</sup>
Castlemont	40%	38%
Fremont	46%	32%
McClymonds	51%	47%
Oakland	22%	22%
Oakland Tech	48%	53%
Skyline	43%	39%

<sup>4</sup> HKS item asks, "How safe do you feel at school?" with response options: very safe, safe, neither safe nor unsafe, unsafe and very unsafe. CHKS data for OUSD is 2011-2012, while most recent state aggregate data is for 2009-2011.



do not appear to feel safer over time. At one target school, just one in five students report feeling safe or very safe on campus.

**Evidence of Need: Lack of engagement and connectedness.** Lack of engagement and connectedness in school can also be symptoms of exposure to home and/or community violence or trauma (Kennedy and Bennett, 2006). Decreased attention and/or concentration, absenteeism, and over- or under-reacting to sudden movements and noises and physical contact may be signs of trauma exposure that affect student engagement in class (National Child Traumatic Stress Network, 2008).

CHKS data for 2008-10 (see table 9) on levels of school connectedness<sup>5</sup> indicate that lack of engagement (low

HKS Data 2008-10	Low Connectedness		High Connectedness	
	9 <sup>th</sup>	11 <sup>th</sup>	9 <sup>th</sup>	11 <sup>th</sup>
	OUSD	13%	21%	34%
County	12%	15%	43%	39%
State	12%	13%	43%	43%

connectedness) among grade 9 OUSD students is about the same as the county and state.

However, the proportion of grade 11 OUSD students who lack engagement is considerably higher. Connectedness to school (high connectedness) is also considerably lower than the county and state at both grade 9 and 11.

The most recent CHKS data for targeted high schools shown in Table 10 indicates a range of engagement (low connectedness) across the six schools, especially among 9<sup>th</sup>

HKS Data 2013-14	Low Connectedness		High Connectedness	
	9 <sup>th</sup>	11 <sup>th</sup>	9 <sup>th</sup>	11 <sup>th</sup>
	Castlemont	20%	21%	33%
Fremont	20%	15%	32%	29%
McClymonds	14%	19%	29%	34%
Oakland	17%	15%	17%	20%
Oakland Tech	6%	11%	43%	37%
Skyline	8%	18%	31%	24%

<sup>5</sup> The HKS includes the National Longitudinal Study of Adolescent Health's five-item School Connectedness Scale.

grade students from a high of one in five students lacking engagement at Castlemont and Fremont Highs (20%) to a low of 6% at Oakland Tech High. Similarly, strong connections to school also vary considerably across the target schools at both grade 9 and 11.

**Evidence of Need: Mental Health Services.** Working in partnership with OUSD for over two decades, the County of Alameda has a long-standing commitment to ensure that students have access to school based mental health services (see project design section for detail). Coordinated Service Teams (COST) exist at most OUSD schools, and at all of the target schools to screen referrals and link students to the appropriate program or service. During the 2013-2014 school year, 5,107 OUSD students were referred to COST, representing 14% of the student population. Of these referrals, one in ten students (3,549 students) received mental health services. The number and percentage of students receiving mental health services is shown in Table 11<sup>6</sup>.

**Identified Gaps and Weaknesses.** OUSD's Behavioral Health Unit has been working with schools to integrate evidence-based behavioral health interventions in order to improve instructional

2013-14	# Students	% enrollment
Castlemont	141	24.8%
Fremont	38	5.2%
McClymonds	116	42.0%
Oakland	190	12.2%
Oakland Tech	60	2.9%
Skyline	41	2.2%

practices, policies, and student outcomes. Currently, the district has a number of pieces in place to assist students and schools in communities with pervasive violence, including; 1) a partnership with the Alameda County Behavioral Health Care Services to offer students access to school based, or referrals to community-based counseling services; 2) strong peer conflict mediation and restorative justice programs to both address the effects of violence and prevent future

<sup>6</sup> In the current data collection system, students who received mental health services were not referred to COST due to crisis response.



violence; 3) the evidenced Positive Behavioral Intervention Supports (PBIS) to improve school environments; and 4) programs or strategies to address bullying and harassment, substance abuse, and gang involvement. While OUSD has introduced a three tiered prevention-focused approach that emphasizes primary (universal), secondary (targeted) and tertiary (intensive) interventions to meet these needs, consistent, high quality implementation and integration of these efforts is needed to break the cycle of violence in the selected school communities.

***Gap 1: Limited training and staff to effectively meet the needs of emotionally and behaviorally challenged students, especially those exposed to pervasive violence.*** While psychologists and school based mental health providers at the six comprehensive high schools identified for this project have received training in trauma informed practices, teachers—the adults who see students most frequently – have not received education and training to understand the impact, and recognize the behaviors associated with pervasive violence or trauma, or ways to use trauma-informed strategies to build relationships and promote student success.

Similarly, while some teaching staff have received training in restorative justice (RJ) practices that can be used in classrooms and school wide such as restorative conversations or community circles, many teachers are reluctant to implement these practices in the classroom due to concerns and fears about their ability to deal with trauma related issues these discussions might raise among students, especially in a group (e.g. circle) setting.

***Gap 2: Lack of capacity to address training needs.*** A lack of resources limits the district's ability to provide follow-up training, or coaching support such as co-facilitation of circles to develop teacher comfort and competence in conducting circles and ensure quality implementation. This problem is exacerbated by high turnover among teaching staff, many of whom are inexperienced and have limited exposure to school and community violence or

students experiencing complex trauma that necessitates repeated offerings of training and support. But limited district resources and a lack of an infrastructure to sustain such trainings constrain OUSD's current capacity to provide it.

***Gap 3: Inadequate staffing to identify and provide mental health services to students exposed to pervasive violence and trauma.*** Currently, a coordinated services team (COST) is in place at each target school to triage referrals and link referred students to mental health and other social services. But specific training in clinical services and interventions for students who have experienced complex trauma and violence has not been conducted for mental health service providers. Moreover, there are not enough school-counseling staff to meet the range of needs expressed by emotionally or behaviorally challenged students, particularly those who are uninsured. For instance, preventative measures such as community conferencing for “re-entry” students – students involuntarily placed in a new school as an alternative to expulsion and/or returning from the juvenile justice system – are indicated but lacking. Clinicians typically have full caseloads and focus on students with acute needs with less time for preventative measures such as community conferencing or circles. MediCal billing requirements limit the range of services that most school-based therapists can provide and restrict who can receive these services based on eligibility. Preventative services are not covered under this funding stream and therefore school-based clinicians are curtailed from providing classroom intervention, behavioral support, trauma education groups, and other preventative strategies that would help to improve the conditions for learning for trauma-impacted students.

***Gap 4: No/Limited screening for exposure to violence or trauma.*** A uniform tool or consistent protocol for screening high risk students – i.e., students suspended for violence related offenses, facing expulsion or re-entering from the juvenile justice system – is not in place.



Similarly, data on students receiving mental health services is collected; but the ability to differentiate whether services are for students exposed to pervasive violence or trauma is not available. Confidentiality issues will likely prevent collection of these data, and/or will be costly (in staff time and resources) to collect. Assessment screenings can provide some indication of the number and percentage of targeted high-risk students who receive such services.

***Gap 5: Lack of services and supports for students involuntarily transferred as an alternative to expulsion.*** While partnerships with the Alameda County Probation Department with funding from the City of Oakland's Measure Y provide case management services and support to students re-entering the school system, similar services are not available for students involuntarily transferred to another school (as an alternative to suspension) even though they face many of the same challenges. In addition, some of these students are on probation (though this data is not currently collected systematically). Schools currently lack the resources to consistently provide Circles of Support and Accountability and wraparound supports to these at-risk students, especially those facing expulsion.

### **Significance**

OUSD has long standing partnerships and collaborations with the County of Alameda and City of Oakland on a number of initiatives to address violence and health in the schools and community to ensure that the health (including mental health) needs of students are met. As the gaps described above indicate pieces to address specific needs are in place, but the resources to fully implement them well, and integrate these pieces into a coherent system of behavior and disciplinary support is lacking. Similarly, over the past several years, OUSD has been shifting away from crisis intervention for students who are facing expulsion or suspended for violence-

related behaviors to a focus on prevention of disruptive behavior and incidents, restorative interventions, and behavioral support.

Project Prevent provides OUSD with an opportunity to build district capacity to improve and expand services for our many high school students who are exposed to pervasive violence and complex trauma – prolonged and repeated exposure to violence or trauma in their community and home as well as school. Taking a trauma-informed lens to OUSD’s tiered behavioral support system – universal prevention, targeted intervention, and intensive intervention for our highest risk students – the Trauma Informed Restorative Practice (TIRP) project proposed will produce a more coherent system of behavioral and discipline management and support at each school, and the district (see figure one in the following section). In short, OUSD sees this grant as a catalyst for systemic change where trauma-informed practices and policies guide the behavioral and disciplinary supports and policies in our schools and the district.

In Table 12 that follows, an overview of the proposed activities for this project and the gaps they will fill indicate how the TIRP project will build district capacity to provide, improve or expand services to meet the needs of students exposed to pervasive violence or trauma. New training on trauma informed practices for teachers and screening tools will build OUSD capacity to identify students exposed to pervasive violence. Training on the use of the new office disciplinary referral form (ODR) and data collection system helps build the infrastructure to monitor and manage behavioral supports and interventions.

Expanding the successful conflict resolution/peer mediation program currently at middle schools to the target high schools, and training mental health clinicians to train teaching staff in trauma-informed strategies builds district capacity to not just provide trauma-informed services but to sustain them over the long-term. Repeated trainings that are often necessary given the high



turnover among teaching staff is much more feasible with OUSD trainers, rather than relying on grants to continually hire consultants. Peer mediators, trained to conduct conflict resolution or certain types of RJ circles will ease the caseload of mental health clinicians who are currently also responsible for providing preventative measures and support. Besides services that peers might provide, the TIRP project will expand the school's capacity to provide mental health services to a wider range of at-risk students (e.g., mental health services to students not Medi-Cal eligible) and restorative justice conferencing and circles to more students in need. These activities are shown in table below and described in more detail in the section that follows.

**Table 12. Overview of Gaps and Activities**

<b>Gaps</b>	<b>Overview of Proposed Activities</b>	<b>Activity Type</b>
Gap 1: Limited training and staff to effectively meet the needs of emotionally and behaviorally challenged students, especially those exposed to pervasive violence.	NEW Trauma-informed training for teachers	Service
	NEW Training on data system and new ODR referral forms	Infrastructure
	EXPAND youth training on conflict resolution/ peer mediation program to high schools	Opportunities & Infrastructure
Gap 2: Lack of capacity to address training needs	ENHANCE mental health clinician capacity to train school staff in trauma-informed strategies	Infrastructure & Sustainability
Gap 3: Inadequate staffing to identify and provide mental health services to students exposed to pervasive violence and trauma	EXPAND mental health services beyond Medi-CAL eligible students	Services
	EXPAND Restorative Justice coordinator capacity to provide and coordinate services, provide training	Services & Infrastructure
	NEW Peer mediators conduct conflict resolution & some RJ circles	Services & Sustainability
Gap 4: No screening for exposure to violence or trauma	NEW Train staff to use a uniform screening tool to identify students exposed to pervasive violence.	Services
Gap 5: Lack of services and supports for students involuntarily transferred as an alternative to expulsion	EXPAND RJ practices beyond students who are involved in the juvenile justice system	Services

## **Quality of the Project Design**

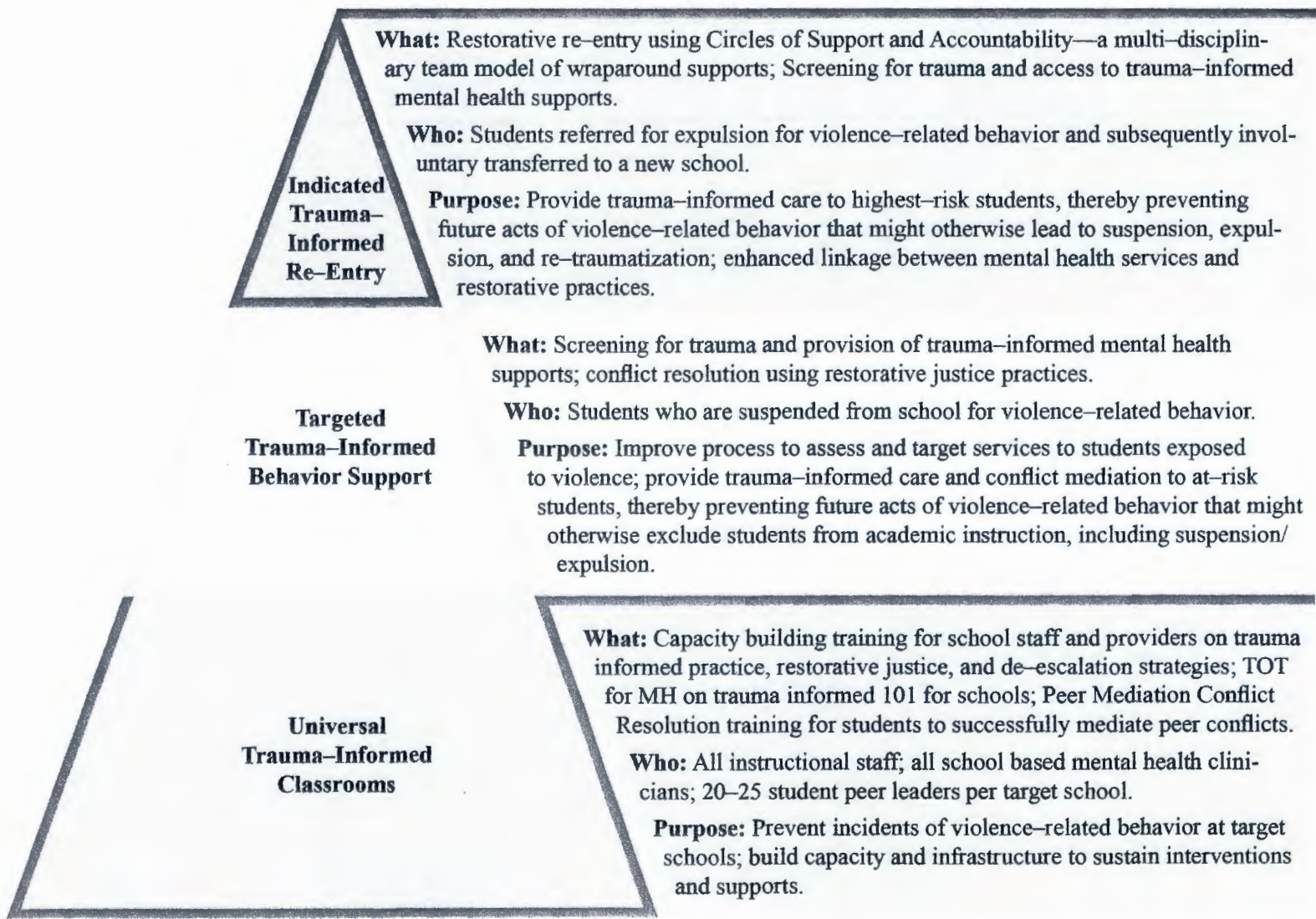
The Oakland Unified School District Trauma Informed, Restorative Practices (TIRP) project seeks to build comprehensive, integrated, and multidisciplinary systems of behavioral and mental health supports that better meet the needs of the diverse youth served by OUSD. Toward the overarching goals of healing the effects of trauma related to experiences of violence in youths' community, home, and school environments, and reducing the likelihood of future experiences of violence, OUSD will work from a multi-tiered system of supports (MTSS) model, installing thoughtfully designed, evidence-based universal, targeted, and indicated trauma-informed, restorative supports at its six highest-needs comprehensive high schools (Figure 1; Table 13: Goals and Objectives). Students will be systematically identified to receive targeted and indicated levels of trauma-informed supports based on pre-established criteria.

At the universal level, OUSD will partner with the University of California, San Francisco's Healthy Environments and Response to Trauma in Schools (HEARTS) program to increase the capacity of school staff to understand the impact of trauma on the wellbeing of youth, including its impact on social and cognitive functioning in the classroom setting, and to use restorative practices that bolster interpersonal relationships, thereby reducing the likelihood of future acts of violence within the school community. In addition to training OUSD's team of mental health clinicians on trauma-informed therapeutic techniques, HEARTS will provide trainings-of-trainers (TOT) to ensure that OUSD mental health clinicians have the capacity to continue providing training and consultation on restorative and trauma-informed classroom practices to instructional staff after the grant period has ended.

To empower youth to improve their own shared school environments through pro-social opportunities for community building and harm restoration, a cadre of 20-25 student volunteers



**Figure 1. OUSD Trauma Informed Restorative Practices Project Overview**



at each of the six target schools will be comprehensively trained using OUSD's Conflict Resolution, Peer Mediation curriculum. The conflict mediation training provided to these students is fully developed in OUSD; it employs a restorative practices model that was developed by the district, has received national attention, has been successfully piloted in eight middle schools for several years, and enjoys strong support from OUSD leadership. This cadre of students will report to the school's Restorative Justice Coordinator (RJC), who will be responsible for their training and will oversee their daily operations.

To support the project at the school site level, OUSD's RJs in target schools will have their time increased from half to full-time in order to coordinate both universal-level restorative practices, including peer conflict resolution, as well as targeted and indicated supports for youth identified as at-risk because they have been involved in violence-related behavior and, as a result, have either been suspended from school or have been involuntarily transferred out of their neighborhood school as an alternative to expulsion.

In contrast to current practice, which typically includes out-of-school suspension with no supports for reentry, students suspended from school for violence-related behavior in targeted schools will be referred to school based mental health providers and screened for trauma. These students will receive mental health services at the duration and intensity recommended by OUSD mental health clinicians. Youth identified for intensive, individualized supports will include those students who have been involuntarily transferred from their neighborhood high school to another high school in the district as an alternative to expulsion for violence-related infractions. In current practice, these students receive few to no reentry supports. Under the TIRP project, these highest-risk students will be screened for trauma and will receive wraparound care to improve the likelihood that they will be socially and academically successful in their new



schools, including Circles of Support and Accountability with school-based support providers, parents, probation officer (when applicable), teachers, and school principal. These identified students will also receive one-to-one support from a school based mental health clinician to address root causes of their violence-related behavior and their probation officer will be included in all Circles of Support and Accountability and case-related meetings.

**Table 13. OUSD TIRP Outcome Objectives, Performance Measures and Timeline for Data Collection**

<b>Objectives</b>	<b>Performance Measures</b>	<b>Timeline</b>
1.1. The percent of suspensions for violent, aggressive, and disruptive behavior will decrease by 10%, annually. <b>GPRA 1</b>	1.1. Out of School Suspensions AERIES student data system	Review data monthly; Semester summary reports
1.2. The number of students receiving school-based and community mental health services to address needs resulting from exposure to violence will increase by 100 annually. <b>GPRA 2</b>	1.2. COST Data Tracking System Conflict mediation Restorative circles	Monthly; Semester summary reports
1.3. School engagement will increase by 2 points annually. <b>GPRA 3</b>	1.3. CHKS school connectedness (students)	Spring annually
1.4. The number of students receiving targeted services will have less than 3 multiple office discipline referrals annually. <b>PROGRAM tier 2</b>	1.4. AERIES student data system	End of year
1.5 The number of students receiving intensive services having repeat suspensions will decrease by 10% annually. <b>PROGRAM tier 3</b>	1.5 AERIES student data system	End of year

**Extent to which the project addresses identified needs of target population.** OUSD has thoughtfully designed the TIRP project to address the prevalence and effects of violence-related behavior in its highest needs high schools. In addition to building trauma-informed school communities by providing high quality training to instructional and clinical staff and specific groups of students, OUSD has identified clear subgroups of students to receive targeted and indicated levels of trauma-informed, restorative support.

**Targeted High Needs Schools.** Six comprehensive high schools have been selected to participate in OUSD's TIRP project. The number of students facing expulsion hearings for each school is shown in table 6 in the previous section of this proposal.

**Targeted & Indicated Students.** The TIRP project will specifically target for increasingly intensive restorative, trauma-informed supports students who have been suspended or involuntarily transferred out of their neighborhood schools due to violence-related behavior. In 2013-2014, 10.1% of OUSD high school students were suspended at least once from school. Students suspended for violence-related behaviors are considered a high-need subgroup for this project due to robust evidence indicating that school suspension not only does not extinguish the behavior for which it is applied, but actually amplifies disruptive behavior and contributes to the process of disconnecting from school (Bradshaw, Waasdorp, & Lead, 2012). Indeed, adolescents' perceptions that these school discipline practices are unclear, unfair and inconsistently enforced are associated with increases in disruptive and defiant behaviors (Wang & Dishion, 2012). Suspension predicts poor academic, interpersonal and professional outcomes, including dropout, substance use, and crime (Lee, Cornell, Gregory, & Fan, 2011). This is certainly the case in OUSD, where 66% of students who dropped out since 2005 have had contact with the criminal justice system.

If they are allowed to continue, these discipline problems increasingly interfere with the learning of students sharing the classroom space and divert additional administrator and teacher time (Osher, Bear, Sprague, & Doyle, 2010). Of the 134 OUSD students who faced expulsion hearings, 101 students were transferred to another school as an alternative to expulsion. Simply transferring students to another school is not an effective solution, however. Without targeted, wraparound supports to assist student and staff to adapt to the new setting and circumstances,



many students repeat prior problem behavior and are subsequently suspended or referred for expulsion again. After repeated failure to re-integrate into the academic setting, many high school students drop out of school altogether, exponentially increasing their chances of coming into contact with the criminal justice system. In standard practice, these students receive no additional social, emotional, or behavioral supports to scaffold their entry into their new schools. In addition to all the risks conferred by school suspension, students who are involuntarily transferred out of their neighborhood schools experience the loss of developed social bonds with staff and peers. Depending on their primary mode of transportation, they may also face increased exposure to community-based violence due to crossing into rival territory on their way to the new school.

**Instructional Staff.** As students' disruptive behavior escalates, adult members of the school community begin to perceive the school more negatively. For instance, teachers' sense of efficacy and job satisfaction are negatively impacted by perceptions of disruptive student behavior (Collie, Shapka, & Perry, 2012). What is more, because they typically receive little to no instruction in the social and biological bases of behavior in their teacher education training programs, OUSD instructional staff are often poorly equipped to work with OUSD students, many of whom are severely impacted by trauma. The combination of this challenging work environment with this skill deficit is a likely antecedent to the extraordinarily high staff turnover in OUSD. In 2012-2013, the Alameda Grand Jury found that 13% –twice the state average – of OUSD's teachers leave every year, and 70% of its teachers leave within five years (ACGOV, 2014).

In an effort to address these systemic concerns, OUSD has made numerous improvements to its systems for behavioral and mental health, all of which are detailed in the subsequent section

of this proposal. OUSD's instructional staff need high-quality professional development (i.e., training, modeling and coaching) to help them understand the purpose and value of these systems and to improve their ability to navigate them in support of their students. The TIRP project will provide much-needed professional development to help instructional staff understand the physiological and psychological effects of trauma experiences, including an overview of its impacts on learning, behavior, and social functioning; provide an overview of tools to help instructional staff work effectively with children whose trauma experiences are impacting their behavior and achievement in the classroom; and provide an overview of the referral process, including the role of instructional staff in assisting with the identification of children with trauma-related needs.

**The Peer Group.** Under conditions of high exposure to violence, peer relationships have a stronger mediating effect on adolescents' problem behaviors than relationships with adults (Salzinger, Rosario, Feldman, & Ng-Mak, 2011). In order to most effectively address the impacts of trauma related to experiences of home, community, and school violence, it is extremely important, then, to make an impact within peer social networks. The TIRP project takes into consideration the value that the peer group has in preventing violence-related behavior and intervening in its escalation by building youths' conflict mediation and resolution skills and empowering them to use these skills through organized school structures. Introducing adolescents to the nature of conflict, instructing them on mediation and conflict resolution skills, and providing meaningful opportunities for them to practice those skills has been linked to decreases in disruptive behavior and improved academic achievement (Stevahn, Johnson, Johnson, & Shultz, 2002).



**Integration with similar or related efforts to improve relevant outcomes, using existing funding streams from other programs or policies supported by community, State, and Federal resources.** The TIRP project will be embedded in a landscape characterized by a number of school district, city, and county initiatives meant to prevent and respond to violence in the Oakland community. To provide seamless support to youth across education, mental health, and juvenile justice sectors, OUSD relies on several long-term partnerships with local public and private entities.

**City of Oakland Measure Y & Alameda County Probation.** Oakland has acknowledged the pervasive violence experienced by youth within its city limits. In a comprehensive effort to address the multidimensional nature of violence, Oakland voters passed Measure Y, the Violence Prevention and Public Safety Act of 2004. Measure Y provides 19 million dollars per year to fund violence prevention activities that are run through collaborative partnerships among social services, nonprofit organizations, juvenile justice, local grassroots and faith-based agencies, and OUSD. Specifically, Measure Y supports the *Juvenile Justice Wraparound Program* and Transition Center that provides multi-disciplinary supports to promote continuity of care for youth who are returning to their homes, schools, and communities after being incarcerated. These Transition Centers are manned by a multi-disciplinary team led by OUSD that ensures the seamless re-entry of youth returning to OUSD schools.

**Alameda County Health Care Services Agency, Center for Healthy Schools and Communities.** The ongoing partnership between OUSD and local community-based mental health providers is supported by Alameda County's Center for Healthy Schools & Communities (<http://www.healthyschoolsandcommunities.org/>) (see Table 14). These agencies provide a continuum of age-appropriate, integrated, health and wellness services to youth on target school

campuses, including individual and small group mental health services. Due to the high level of poverty among students at OUSD, these agencies are able to publically finance many of the individual therapeutic services provided by its mental health clinicians. Over \$14 million was accessed last year in funding for Tier 2 and Tier 3 interventions through the Alameda County Health Services and Behavioral Health Care Services, Medi-Cal Administrative Activities-LEA funding, and the City of Oakland’s Oakland Fund for Children and Youth and Measure Y initiatives. For this project, school based mental health clinicians will assist families in the enrollment process for Medi-Cal or private insurance. In the latter case, it is expected that more children than ever will be able to access mental health and substance abuse services given the new parity requirements of the Patient Protection and Affordable Care Act. They will also work with target schools to ensure that any child who is eligible for mental health services through protections afforded them by the Individuals with Disabilities Education Act (IDEA) will receive those services. In most cases, children in OUSD will be eligible for mental health-related services under one or more of these various funding sources. However, in some cases, children who are ineligible under these funding sources will receive care from clinicians using funding provided through this project.

<b>Table 14. Partner agency providers of school based mental health supports in target schools</b>	
<b>Target School</b>	<b>Lead Partner Agency</b>
Oakland	Lincoln Child Center
Skyline	Native American Health Center
McClymonds	Children’s Hospital & Research Center of Oakland
Castlemont	Children’s Hospital & Research Center of Oakland
Oakland Tech	Lincoln Child Center
Fremont	La Clinica De La Raza

**Office of Civil Rights Voluntary Agreement.** In September of 2012, OUSD entered into a voluntary, multi-year agreement with the US Office of Civil Rights (OCR) to address inequities



in the frequency and intensity of disciplinary actions taken against African American students. Although these discipline disparities are not unique to OUSD, the district fully accepted its responsibility to reform discipline policies and practices to reduce punitive, exclusionary practices; improve school climate; provide a continuum of prevention and intervention supports; and improve discipline-related data collection and use. Indeed, lost days of instruction for African American males dropped from 5,860 in 2010-11 to 1,504 in 2012-2013. In the same period, the dropout rate in OUSD declined from 28% to 22%. In light of these results, OUSD's efforts have been lauded as "unprecedented" and "a model for districts everywhere" by both the OCR and the US Education Secretary, Arne Duncan. The TIRP project's goals are consistent with the goals outlined in the OCR agreement, and will therefore be supported by district funds.

**District PBIS Rollout.** The TIRP project will commence concurrently with the district-wide adoption of Positive Behavior Interventions and Supports (PBIS). After piloting PBIS in a selection of its schools using a phased rollout, OUSD expects that all target schools will be implementing PBIS in the 2014-2015 school year (Table 15). OUSD adopted PBIS to prevent student disruptive

behavior through universal or school-wide prevention (Tier 1), behavior interventions with groups of students

Table 15. Years of PBIS Implementation at Target Schools		
Schools	Current Implementation Year	2014-15 Implementation Year
Oakland	2	3
Skyline	1	2
McClymonds	0	1
Castlemont	0	1
Oakland Tech	2	3
Fremont	2	3

exhibiting behavior problems (Tier 2), and indicated services with individual students exhibiting recurrent behavior problems (tier 3). OUSD's full 2014-2015 PBIS rollout will include the

district-wide implementation of an Universal Office Discipline Referral Form and associated student information system, a data system to collect, analyze, and report discipline incident data for data-driven decision-making. All staff members will receive training on procedures for documenting discipline problems through the use of the discipline referral form. Data are collected such that discipline incidents can be tracked for specific students, by time of day or date, by types of behavior (e.g., defiance, verbal threat), and by school location. These data are used to provide information to all staff regarding discipline issues, to evaluate the effectiveness of Tier 1 supports, and to identify students in need of additional support and interventions (Tier 2 and Tier 3 interventions). In order to avoid fragmented systems of behavioral and mental health care, the TIRP project staff will carefully assist target schools in integrating restorative, trauma-informed into their PBIS frameworks.

**District Restorative Justice Initiative.** In partnership with *Restorative Justice for Oakland Youth (RJOY)*, and with support from *The California Endowment (TCE)*, OUSD was one of the first LEAs in the nation to adopt a restorative justice approach to remediate the disproportional application of school discipline practices to African American males (<http://www.ousd.k12.ca.us/restorativejustice>). At the project's demonstration site, Ralph Bunch High School, a continuation school, student suspension rates fell by 74%, referrals for violence-related behavior fell by 77%, and gaps in discipline referrals by students' race were eliminated from Academic Year (AY) 2010-11 to AY 2012-13. Encouraged by these promising results, OUSD has expanded RJ to 27 schools, including all six target schools in the TIRP project.

*Restorative Justice Coordinator.* All TIRP target sites currently have a .5 FTE Restorative Justice Coordinator (RJC), paid out of district funds. The TIRP project will increase RJC



positions to 1.0 FTE. The RJC in partnership with a District RJ Coach would be responsible for coordinating Tier 1 trainings for staff and students, and Tiers 1 & 2 restorative interventions for students who are suspended or involuntarily transferred.

**Extent to which the project is supported by evidence of promise.** In addition to ensuring that more students are able to access mental health services for the purpose of addressing trauma from violence-related experiences, OUSD has selected to implement only practices---school based restorative justice, peer mediation and conflict resolution, and trauma-informed school practices---that are linked by high quality research using controlled correlational, quasi-experimental, and/or experimental designs to measurable priorities outlined by the Project Prevent grant (i.e., decreases in disruptive, aggressive and violent behavior at school; increases in school engagement). The evidence for each of these approaches is discussed in detail below.

**School-Based Restorative Justice/ Restorative Practices.** Originating from the criminal justice field, school-based restorative justice (RJ) provides a framework for infusing restitution and repair in the process of administering school discipline practices (Sprague & Nelson, 2012). RJ practices focus on building a sense of the school as a community of shared norms and addressing student misbehavior by repairing harm and restoring positive relationships (Suvall, 2010). RJ practices in school settings are built into a multi-tiered systems of support approach—focusing on school-wide community building and prevention practices (universal supports/tier 1), preventing harm and resolving differences when harmful behavior takes place (targeted supports, tier 2), and restorative interventions aimed at reintegrating students, rebuilding relationships, and repairing harm when violence-related behaviors take place (indicated supports, Tier 3) (see Figure 2).

Tier 1 is characterized by the use of classroom Community Building Circles (CBCs) to build relationships and promote restorative conversations. The goal is to promote a cohesive caring classroom and school community that facilitates effective communication between and among staff and students. CBCs are used for a range of activities, including: lessons, morning meetings (“check-ins”), community building, and problem solving. Through CBCs and other relationship building strategies, restorative practices explicitly integrate the perspectives of students into community building efforts. CBCs are also used by students and staff to develop classroom constitutions – documents that explicitly define values and classroom behavior standards.

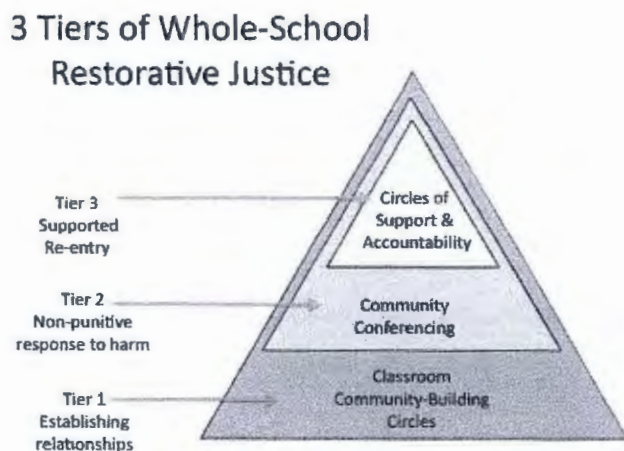
Tier 2 is characterized by the use of Community Conferences (CCs) used as non-punitive responses to harm, including: restorative conversations, hallway conferences, formal restorative conferences, and peer mediation to respond to disciplinary issues. All of these CCs involve face-to-face encounters among those directly impacted by the event or behavior. These activities aim to address the causes of the behavior, support the accountability of the offender, and promote restoration for the victim, offender, and the community. For repeated, serious misconduct (Tier 3), restorative interventions include Circles of Support & Accountability involving fellow students, families, school staff, community support personnel, and others affected. These activities utilize restorative principles—focusing on harm and ways to repair harm rather than relying on punitive consequences.

Representing an initial effort to examine the effects of RJ on school-related outcomes, the Youth Justice Board of England and Wales issued an evaluation report of a national RJ initiative which indicated that participating students largely felt satisfied with the RJ process, that RJ agreements were typically effective in extinguishing the behavior for which they were written, and that teachers reported significant differences in student behavior after implementing RJ



school-wide (YJBEW, 2004). A meta-analysis on the effects of RJ practices determined that they were more effective than treatment-as-usual for improved offender satisfaction, decreased recidivism, and increased restitution compliance (Latimer, Dowden, & Muise, 2005). Attesting to the increased interest in RJ as an alternative to punitive and exclusionary disciplinary practices, the Office of Juvenile Justice and Delinquency Programs (OJJDP) has established a new grant opportunity, the School Justice Collaboration Program, which seeks to expand restorative justice practices in education-juvenile justice-mental health partnerships. A number of programs undergirded by principles of RJ have been identified as “promising” on OJJDP’s clearinghouse of model programs.

Figure 2. OUSD Restorative Justice MTSS Model



**Conflict Resolution, Peer Mediation Skills Development.** To empower youth to affect change in their own school environments by preventing and repairing harm, OUSD implemented a Conflict Resolution, Peer Mediation (CRPM) program. The CRPM program is based on principles of youth development and social-emotional learning. Through 16 hours of instruction, students learn important tools for preventing and mediating the types of interpersonal conflicts

among their peers that can escalate to violence if left untreated. Students learn to identify, regulate, and communicate about their own emotional experiences; empathize with others' experiences; listen skillfully; recognize personal biases; communicate in ways that do not escalate conflict; and negotiate solutions. The training is broken into two phases: Restorative Foundations ( i.e., exploring concepts of conflict and harm, restorative vs. punitive responses, story-telling, role playing), and Restorative Responses (i.e., exploring perspective, relationships and emotions, asking questions and restating, and practicing mediation tools). The training elements included in OUSD's CRPM model have been associated in the research literature with reduced student conflicts on campus and reduced numbers of suspensions, reduced problem behavior, and improved academic achievement (Johnson & Johnson, 1996; Stevahn, Johnson, Johnson, & Shultz, 2002).

Currently, OUSD recruits and trains approximately 120 student leaders (11-14 years old) in 8 middle schools every year. Student participants are nominated by their teachers and peers at the start of the school year. Youth reflect school diversity, and once trained, co-facilitate up to a total of 160 mediation/RJ circles per month to resolve conflict and repair harm. They also use RJ practices to implement community-building circles and for re-integration of students into the school. The TIRP project would extend the CRPM program to all target high schools.

**Trauma-Informed Schools.** With the TIRP project, OUSD will begin the process of extending its progressive effort to emphasize community building and social-emotional skill development by transforming target schools into trauma informed communities that are sensitive to the needs of the multitude of OUSD students who regularly experience violence in their homes and neighborhoods. Consistent with the US Substance Abuse and Mental Health Services Administration's (SAMHSA) conceptualization, OUSD will incorporate training to assist school



personnel in understanding the prevalence and impact of trauma on the development of children and youth and the role that they may play in helping children and youth recover from trauma.

UCSF HEARTS will provide a series of trainings (approximately 12 hours), “Trauma 101: Fundamentals of Addressing Complex Trauma in Schools”, to staff in target schools. This training will cover the effects of complex trauma on students and school communities; implementing trauma-sensitive strategies (student-focused, classroom-wide, and school-wide) to promote student success; and addressing stress, burnout, and vicarious trauma in school staff. In addition, the 30-hour UCSF HEARTS Training of Trainers (TOT) includes a basic 101 TOT followed by an advanced 201 TOT that dives deeper into the role of the mental health clinician and includes a seminar-like professional learning community using case based learning. UCSF will provide advanced TOT trainings for OUSD mental health clinicians. The training will introduce multilevel clinical interventions and strategies to address complex trauma in students, promote school success, and create safer school environments, and will include training on providing collaborative, trauma-informed mental health consultation to school staff. All participants in the TOT will receive a consolidated curriculum package to assist OUSD staff plan their own trainings in subsequent years. This curriculum will have the following components: Introduction and Rationale; Powerpoint slides with notes on how to deliver them; and a Toolkit for use with teachers that contains handouts on trauma-sensitive classroom strategies and strategies for addressing stress, burnout, and vicarious trauma. Finally, UCSF HEARTS will deliver technical assistance to OUSD personnel as they work to embed trauma-sensitive practices into their clinical work and classrooms.

Results from staff evaluation surveys in schools where HEARTS has been implemented for at least two years (weighted means for the last school year that HEARTS was implemented at





their school) indicated a 78% increase in teacher self-efficacy, a 53% increase in the use of trauma-sensitive practices, and a 26% increase in students' time spent in classrooms (per staff report). In addition, in an in-depth look at one school's pre-HEARTS implementation and post-implementation data, there were indications of school-wide increases in instructional time, with a 32% decrease in disciplinary office referrals and a 42% decrease in student violence incidents after the first year of HEARTS implementation, and an 89% decrease in suspensions after four years of HEARTS implementation.

### **Quality of the Management Plan**

**Project Staffing.** This project will be housed in OUSD's Family, Schools, and Community Partnerships Department, and overseen by **Barbara McClung, OUSD Director of Behavioral Initiatives**. As the leader of the implementation of PBIS, restorative justice, school-based behavioral health services, violence prevention programs, and other district-wide behavioral health initiatives, she is well-positioned to direct this project. She brings her past experience as a director of youth and adult programs, clinical supervisor and mental health therapist within the juvenile justice system to this role. Ms McClung will supervise the program manager and participate in budget development and program evaluation and reporting to ensure that the project is administered according to the proposed grant priorities.

To manage the projects day-to-day implementation, a 1.0 FTE **Project Manager (PM)** will be hired and supervised by Ms. McClung. A background in behavioral health care, prior management experience, preferably in a public school setting, and experience, competence and comfort working with multi-cultural, high-need communities are key qualifications for this position. The PM will contract and collaborate with the HEARTS trainer, and the evaluator; contract with restorative justice coordinators and community-based agencies providing school

based mental health services for uninsured students at each of the six schools; be responsible for data collection on project implementations and outcomes; budget management; and provide reporting to the grantor.

OUSD will employ a full-time **Restorative Justice (RJ) Specialist** with district funds to provide follow-up training and coaching support to teachers at the five target schools; monitor implementation of trauma-informed restorative classroom practices; work with restorative justice coordinators to develop criteria for selecting and training peer mediators; and be responsible for the data collection on RJ circles and conflict mediation/resolution implementation and outcomes. Required qualifications for this position include a background in restorative practices, preferably in public school settings, prior experience training adults, and strong knowledge of youth development practices..

To support the implementation of violence prevention programming at the school site level, OUSD will contract with the six existing **RJ Coordinators** to extend their time to full-time. RJ Coordinators will be responsible for implementing the peer mediation program; coordinating and facilitate the community conferencing and other RJ circles for targeted students; providing case management and wraparound support for students involuntarily transferred, supporting professional development of school staff in using restorative practices, and of leadership in developing school systems including a discipline matrix that is truly restorative. The RJC will also be responsible to collect and report data on all circles, conflict mediations, and re-entry processes facilitated.

University of California at San Francisco (UCSF) Healthy Environments and Response to **Trauma in Schools (HEARTS)** will provide training to school-site staff and mental health providers. **Dr. Joyce Dorado**, the director of HEARTS and Associate Clinical Professor in the



UCSF-SFGH Department of Psychiatry, Child and Adolescent Services, has been working with San Francisco Unified School District (SFUSD) since 2008 to provide prevention and intervention training to teachers, school mental health professionals, administrators and support staff (e.g., paraprofessionals), with the aim of promoting school success for traumatized students by creating school environments that are more trauma-sensitive, safe, and supportive of the needs of traumatized youth, as well as of the needs of the school staff who work with them. Although HEARTS has been working with SFUSD district-wide, they have concentrated their efforts on the Southeast sector of the San Francisco, in schools where there is a high density of students from under-resourced neighborhoods with relatively high rates of community violence.

**WestEd**, a preeminent research, development, and service organization with 600 employees and 17 offices nationwide, will serve as evaluator. Its Health and Human Development Program (HHDP) staff have evaluated eight Grants to Reduce Alcohol Abuse, and 11 SS/HS projects. Currently HHDP staff evaluate the Safe and Supportive Schools (S3) grants in Louisiana and South Carolina, and Early Connections – an effort to provide mental health services to children ages 0-5 in Alameda County.

**Project management.** The staffing described above ensures that project tasks will be accomplished on time and within budget. The Program Manager, RJ coordinators, and school-based mental health staff who are responsible for implementation of the key project tasks at Tiers 1, 2, and 3, respectively, along with the program manager, comprise the project implementation team who meet regularly to ensure that projects activities at each of the tiers are on-track and completed on a timely basis, working together plan and deliver trainings, consult on challenges, and develop strategies to improve preventative systems and improve barriers to implementation.

At the school level, the School Culture and Climate Teams (SCCTs) are expected to be established at target school sites by the start of the 2014-2015 school year. In addition to the RJ coordinator, SCCTs will include an administrator, one or more lead teachers, a classified staffer, a family outreach person and/or parent leader, staff from mental health agencies and other CBOs, and a student. This team will be responsible for planning and monitoring implementation of PBIS by reviewing school and student level progress indicators for PBIS and this project. Professional development and coaching for site teams will be provided to: assist teams in understanding the key elements of behavioral and disciplinary supports at their school (e.g., PBIS, school based trauma-informed mental health supports, peer mediation/conflict resolution, and RJ); to incorporate trauma screening tools into existing methods of assessment, and to collect and analyze a variety of data points to monitor implementation and efficacy, with attention to developing an integrated system of prevention, early intervention, and intensive services through the trauma lens. Major milestones and timelines for accomplishing project tasks are shown in Table 16.



<b>Table 16. Milestones OUSD TIRP Project</b>	<b>When</b>	<b>Responsible</b>
Identify Site Team members for Year 1 cohort	<i>Yr1, Q</i>	Ms. McClung
Hire Project Manager (PM) RJ Specialist & Expulsion Case Manager	<i>Yr1,</i>	Ms. McClung
Extend RJ Coors. Contracts; develop scope of work	<i>Yr1</i>	McClung
Contract UCSF HEARTS; develop training plan	<i>Yr1</i>	McClung
Contract evaluator; develop evaluation plan	<i>Yr1</i>	McClung
Training for teachers	<i>Yr 1, Q1</i>	PM;UCSF
Yr 1 cohort schools conduct Tier 1 planning process	<i>Yr 1, Q1-4</i>	PM, Site Leads
Yr 1 cohort schools implement Tier 1, begin Tiers 2	<i>Yr 2, Q1-4</i>	PM, Site Leads
Yr 1 cohort schools implement Tiers 2 and 3, including restorative justice circles and practices	<i>Yr 3, Q1-4</i>	PM, Site Leads
Identify schools, Site Team members for Yr 2 cohorts	<i>Spring 2015</i>	McClung, PM
Yr 2 cohort schools follow same 3-year process	<i>Yrs 2-4</i>	PM, Site Leads
Identify schools, Site Team members for Yr 3 cohorts	<i>Spring 2016</i>	Ms. McClung, PM
Yr 3 cohort schools follow same 3-year process	<i>Yrs 3-5</i>	PM, Site Leads
All OUSD schools implement PBIS with fidelity	<i>By spring 2019</i>	Ms. McClung, PM
Contract UCSF HEARTS; develop training plan	<i>Yr1</i>	McClung
Contract evaluator; develop evaluation plan	<i>Yr1</i>	McClung

### **Quality of the Project Evaluation**

*Methods are thorough, feasible, and appropriate to goals and objectives.* The evaluation will assess both individual and contextual changes among students receiving services as part of the TIRP project. Specifically, the project will address the three GPRA measures established for the program: 1) the percentage of grantees that report a measurable decrease in violent, aggressive, and disruptive behavior in schools served by the grant; 2) the percentage of grantees that report a measurable increase in the number of students in schools served by the grant

receiving school-based and community mental health services to address student needs resulting from exposure to violence; and 3) the percentage of grantees that report a measurable increase in the school engagement of students served by the grant.

The targets proposed for the Performance Measures were determined based on trend data, unique qualities of the schools (administrators, staff turnover, number of partners providing similar services), and the intensity of the proposed interventions. Comparing the targets to the state and county data provided us with an estimate of what we believe are ambitious, but achievable targets.

The data collection and reporting methods are those in place at the district (e.g., the CHKS, which has been administered in the district since 2000 and the newly developed standardized ODR form and COST data system). To successfully report on number and types of referrals and identify the number of students receiving referrals and the number of referrals per student, it is imperative to have a standardized method for reporting and entering the data into the system. Teachers and mental health staff will all receive training on the importance of quality data coding and entry to ensure valid measures.

**Evaluation design.** The evaluation will consist of a process evaluation and an outcome evaluation, each playing a critical role in informing both program staff and ED about the status of implementation and the overall project's effectiveness. The **process evaluation** will: 1) document and measure the fidelity with which the multi-tiered behavioral support system is implemented, 2) identify challenges encountered during implementation, 3) document changes made in the program design to increase efficiency and effectiveness, and 4) ensure project activities are accessible and utilized by intended targets. A thorough description of what happens during the project will provide information about which features work and which do not, which



can then be used to facilitate planning, decision-making, and program corrections. The **outcome evaluation** will assess the degree to which the project accomplishes its overall goal – improve outcomes for students exposed to pervasive violence in their communities through involvement in a multi-tiered system of supports (MTSS) model in their schools. – and the particular outcome targets listed in the “Design” section. It will seek to answer these research questions, based on the program goals: 1) Did the multi-tiered behavioral framework improve behavioral outcomes for students exposed to pervasive violence in their communities? 2) Do the interventions and/or services reduce the number of disciplinary referrals, suspensions, recidivism, and expulsions (especially for those receiving Tier 2 and 3 interventions)? and 3) Are more students identified as having violence-related behaviors receiving services? To answer these questions, data will be collected from multiple sources, with both evaluation components utilizing quantitative and qualitative data, as detailed below.

**Process evaluation data.** OUSD Behavioral Health Office reports will document project progress by monitoring professional development activities (agendas, sign-in sheets, satisfaction/knowledge surveys) and progress toward implementing the uniform data referral system (e.g. numbers of trauma-informed screenings, number, intensity and duration of individual and small group services, number of students participating in Restorative Circles and peer mediations, number of involuntary transfers, frequency of recidivism). These reports will be used as the project evolves to monitor progress and provide accountability information about success. (See Outcome Objectives in Table 13 in the project design section). Additionally, the evaluator will conduct structured interviews with key stakeholders (administrators and school teams) at the end of each semester.

**Student Measures.** ODRs, suspensions, and student/staff perceptions of student engagement will inform the outcome evaluation. Student data on ODRs, suspensions, and referral to mental health services will be entered into AERIES using the District's newly developed ODR Form at each school. These data will provide data about progress on **GPRAs 1 and 2** at each school. In the 2013-14 school year, of the 3, 214 out-of-school suspensions, the largest proportion were related to violence. The Ed Codes to measure this were for the following infractions: injury, willful force, sexual assault and hate violence, and suspensions for disruptive behaviors such as defiance and obscenity; for drugs, and weapons possession. The proportion of combined incidents for these infractions will provide data to assess GPRA 1.

The *California Healthy Kids Survey (CHKS)*, administered annually in spring to 9<sup>th</sup> and 11<sup>th</sup> grade students, assesses school-related attitudes, behaviors, and experiences about risk and protective factors, learning engagement, and student connectedness to school (Objectives 1.3 and 1.5). District PBIS Coaches and team leads administer the CHKS annually in spring. The CHKS was developed for the California Department of Education to assist school districts monitor program outcomes related to substance use, perceptions of safety at school and in neighborhoods, school connectedness, and resilience. The CHKS includes 5 items assessing **GPRA 3** – student engagement – (I feel close to people at this school, I am happy to be at this school, I feel like I am a part of this school, the teachers at this school treat students fairly, and I feel safe in my school). These items form the School Connectedness Scale, and the scale scores are reported as the percentage of students that fall into three categories: “low”, “medium”, and “high”. The percentage of students that fall into the “high” category each year on the School Connectedness Scale will be used to assess engagement. Psychometric studies have shown that CHKS scales have a high degree of reliability. Other research likewise shows that confidential surveys like the



CHKS have a high degree of validity in student answers—even with sensitive questions. In addition, the CHKS uses several checks and measures to ensure validity.

**Adult Measures.** School staff will be asked to complete the online California School Climate Survey (CSCS). The survey items are aligned to the student survey and will inform **GPRA 3 – student engagement** by providing confidential staff perceptions about learning and teaching conditions for both general and special education and will be used to regularly inform decisions about professional development, instruction, the implementation of learning supports, and school reform. Underlying the survey is research and theory supporting the importance of fostering school environments that are academically challenging, caring, participatory, safe, and healthy.

**Data Collection and Management.** Protocols will be developed to ensure accuracy of the data and timely completion of evaluation tasks. These protocols ensure that the TIRP Program successfully transmits all required data to the evaluation data collection center. OUSD project staff has received training in confidentiality requirements and procedures.

**Data analyses.** The evaluators will use a mixed model approach for the evaluation. It will analyze quantitative data using the STATA Data Analysis and Statistical software, and provide summary reports to OUSD within 2 months of receiving the data. ODR data will be collected and analyzed at the site level and shared with the evaluator monthly. Suspension data will be collected from the district at year-end. Descriptive analyses will yield total number of violence-related suspensions; number of events per student by grade, gender, and ethnicity for ODRs and suspensions; numbers of students referred and receiving services (including screening for exposure to pervasive violence), and CHKS data. Qualitative data from interviews and site visits

will be summarized for OUSD within one month of data collection. All data will be analyzed to assess changes in disproportionality of disciplinary actions across ethnic groups.

***Use of evaluation to provide performance feedback, assessment of progress, and inform program refinements.*** The evaluators will document findings in periodic summaries, year-end reports, and executive summaries. They will meet monthly with the Project Manager, Behavioral Health Coordinator and COST to discuss progress toward benchmarks and examine findings. The meetings will serve as a forum for practitioners to share best practices based on rigorous data examination and give stakeholders the opportunity to ask questions, understand the findings, and discuss the practical implications of the data for their practice. Discussions will also guide the direction for future data analysis. OUSD administrators and project staff will use the findings to inform program implementation and improvements.

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**Reports.** The evaluator will collaborate with the PM and the CSMs to generate mid-year and annual reports. Data will be summarized, and user-friendly summary reports will be prepared and shared with key stakeholders. The evaluator will collaborate with the PM to collect all process data to incorporate into the reports and will prepare all analyses and tables to include in required reports.

Involving various stakeholders in evaluation decisions will serve to maximize the relevance and uses of evaluation data, and of the process as well, by working in partnership with the primary intended users throughout the duration of the study. The various data collection



strategies conducted at regular and clearly delineated time points will allow for the periodic assessment of progress toward the projects goals and objectives. At the end of each school year, benchmarks of outcome variables will be compared to established project objectives to ensure adequate progress toward goals is being made, and that any shortcomings are identified and addressed.

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