File ID Number	23-2437
Introduction Date	12/13/23
Enactment Number	23-2135
Enactment Date	12/14/2023 CJH
By	

OAKLAND UNIFIED SCHOOL DISTRICT
Community Schools, Thriving Students

OAKLAND UNIFIED SCHOOL DISTRICT
Office of the Board of Education

December 13, 2023

To: Board of Education

From: Kyla Johnson-Trammell, Superintendent
Preston Thomas, Chief Systems and Services Officer
Kilian Betlach, Executive Director, Enrollment Department

Subject: Grant Award - U.S. Department of Education - School Diversification Project - Enrollment Department

ACTION REQUESTED:

Acceptance by the Board of Education of a grant award from the U.S. Department of Education in the amount of $975,477.00, to support enrollment stabilization efforts for the District, for the period of October 1, 2023 to September 30, 2025, pursuant to the terms and conditions thereof for the grant years, if any.

BACKGROUND:

Grant award for OUSD's Enrollment Department's School Diversification Project for the 2023-2026 fiscal years was 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
23-2437	Yes	Grant	Oakland Unified School District Enrollment Department	To support enrollment stabilization efforts via the School Diversification Project to reach all parts of the Oakland community.	October 1, 2023 - September 30, 2025	U.S. Department of Education	$975,477.00

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 Enrollment Stabilization program

FISCAL IMPACT:

The total amount of grants will be provided to OUSD's Enrollment Department from the funders.

- Grants valued at: $975,477.00

RECOMMENDATION:

Approval by the Board of Education of a Grant Award for the Enrollment Department's School Diversification Project for fiscal years 2023-26, pursuant to the terms and conditions thereof, for the grant year, if any.

ATTACHMENTS:

Grant Face Sheet
Grant Award Letter
Fostering Diverse Schools Project Narrative

OUSD Grants Management Face Sheet

Title of Grant: **Enrollment Growth & Diversification Project**	**Funding Cycle Dates:** **10-01-2023 to 9-30-2025**
Grant's Fiscal Agent: **(contact's name, address, phone number, email address)** **Dept of Education** US Dept of Education 550 12th Street, SW Room 6087 Washington DC 20202 202-245-8006 **obssed@servicenowservices.com**	**Grant Amount for Full Funding Cycle:** **$975,477.00**
Funding Agency: **United States Department of Education**	**Grant Focus:** Expanding promising enrollment stabilization efforts to reach all parts of the Oakland community.
List all School(s) or Department(s) to be Served: **Enrollment Department**	

Information Needed	**School or Department Response**
How will this grant contribute to sustained student achievement or academic standards?	Healthy enrollment is the basis for a healthy school district. Enrollment is the basis for budgetary projections, which become programs, which become services for students. We know that Oakland, like the rest of the Bay Area, California, and indeed the country, is facing challenges of declining enrollment because of a number of factors. Add to this Oakland specific challenges such as gentrification, the proliferation of charter schools, and a county board the welcomes inter-district transfers out of the city, and we

	face a set of unique and varied challenges. Through this grant, we hope to test further research and focal group work on attitudes toward OUSD, pilot approaches to school and district promotion, and identify next steps in increasing enrollment in such a way as to increase the socioeconomic diversity in our schools.
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 4.22% 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 will consist primarily of completion of stated objectives and activities.
Does the grant require any resources from the school(s) or district? If so, describe.	Much of the work is located within the District's Enrollment Office and compliments work underway under the auspicious of the Enrollment Stabilization Board Policy. Where the grant calls for additional resources, that work is paid for.
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 4.22% for all OUSD site services in the grant's budget for administrative support, evaluation data, or indirect services.)**	Services are being paid through an OUSD contract or MOU
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.)**	No
Who is the contact managing and assuring grant compliance? **(Include contact's name, address, phone number, email address.)**	Name/Title: Kilian Betlach, Executive Director, Enrollment Site: Address: Phone: 415-314-6253 Email: Kilian.Betlach@ousd.org

Applicant Obtained Approval Signatures:

Entity	Name/s	Signature/s	Date
Executive Director, Enrollment	Kilian Betlach		11/29/2023

Chief Systems and Services Officer	Preston Thomas		11/29/2023

Grant Office Obtained Approval Signatures:

Entity	Name/s	Signature/s	Date
Senior Business Officer	Lisa Grant-Dawson		
Superintendent	Kyla Johnson-Trammell		12/15/2023

Approved as to form:

Jenine A. Lindsey

Jenine Lindsey, Assistant General Counsel
Interim General Counsel

U.S. Department of Education

Grant Award Letter

S424G230030
Kilian Betlach
Oakland Unified School District
1011 Union Street
Oakland, CA 94607

S424G230030

Jonathan Mayer
Oakland Unified School District
1011 Union Street
Oakland, CA 94607

US Department of Education
Washington, D.C. 20202

GRANT AWARD NOTIFICATION

1 RECIPIENT NAME

Oakland Unified School District
1011 Union Street
Oakland, CA 94607

2 AWARD INFORMATION

PR/AWARD NUMBER	S424G230030
ACTION NUMBER	1
ACTION TYPE	New
AWARD TYPE	Discretionary

3 PROJECT STAFF

RECIPIENT PROJECT DIRECTOR
Kilian Betlach (415) 314-6253
kilian.betlach@ousd.org
EDUCATION PROGRAM CONTACT
Gillian D Cohen-Boyer (202) 401-1259
Gillian.Cohen-Boyer@ed.gov
EDUCATION PAYMENT HOTLINE
G5 PAYEE HELPDESK 888-336-8930
obssed@servicenowservices.com

4 PROJECT TITLE

84.424G
School Diversification Project, Oakland Unified School District; Oakland, California

5 KEY PERSONNEL

NAME	TITLE	LEVEL OF EFFORT
Kilian Betlach	Project Director	10 %

6 AWARD PERIODS

BUDGET PERIOD	10/01/2023 - 09/30/2024
PERFORMANCE PERIOD	10/01/2023 - 09/30/2025

FUTURE BUDGET PERIODS

BUDGET PERIOD	DATE	AMOUNT
2	10/01/2024 - 09/30/2025	$475,790.00

7 AUTHORIZED FUNDING

THIS ACTION	$499,687.00
BUDGET PERIOD	$499,687.00
PERFORMANCE PERIOD	$499,687.00

8 ADMINISTRATIVE INFORMATION

UEI	U871PCLAXAD7
REGULATIONS	EDGAR AS APPLICABLE 2 CFR AS APPLICABLE
ATTACHMENTS	2 , 3 , 6 , 8 , 9 , 11 , 12 , 13 , 14 , GE1 , GE2 , GE3 , GE4 , GE5

9 LEGISLATIVE AND FISCAL DATA

AUTHORITY:	PL SECTION 4103 (A) (3) ESEA THE ELEMENTARY AND SECONDARY EDUCATION ACT
PROGRAM TITLE:	STUDENT SUPPORT AND ACADEMIC ENRICHMENT (SSAE) PROGRAM
CFDA/SUBPROGRAM NO:	84.424G

US Department of Education
Washington, D.C. 20202

GRANT AWARD NOTIFICATION

FUND CODE	FUNDING YEAR	AWARD YEAR	ORG. CODE	CATEGORY	LIMITATION	ACTIVITY	CFDA	OBJECT CLASS	AMOUNT
1000M	2022	2023	ES000000	B	QMB	009	424	2521A	$499,687.00

10

PR/AWARD NUMBER: S424G230030
RECIPIENT NAME: Oakland Unified School District
GRANTEE NAME: OAKLAND UNIFIED SCHOOL DISTRICT
1000 BROADWAY, STE 450
OAKLAND, CA 94607 - 4039
PROGRAM INDIRECT COST TYPE: Restricted
PROJECT INDIRECT COST RATE:

TERMS AND CONDITIONS

(1) THE FOLLOWING ITEMS ARE INCORPORATED IN THE GRANT AGREEMENT:

1) THE RECIPIENT'S APPLICATION (BLOCK 2);
2) THE APPLICABLE EDUCATION DEPARTMENT REGULATIONS: 2 CFR PART 180; NONPROCUREMENT DEBARMENT AND SUSPENSION AS ADOPTED AT 2 CFR PART 3485; 2 CFR PART 200 AS ADOPTED AT 2 CFR 3474 (BLOCK 8), AND 34 CFR PARTS 75, 77, 79, 81, 82, 84, 86, 97, 98, 99; AND THE PROGRAM REGULATIONS SPECIFIED IN BLOCK 8; AND
3) THE SPECIAL TERMS AND CONDITIONS SHOWN AS ATTACHMENTS IN BLOCK 8 ON THE INITIAL AWARD APPLY UNTIL CHANGED.

THIS AWARD SUPPORTS ONLY THE BUDGET PERIOD SHOWN IN BLOCK 6. IN ACCORDANCE WITH 34 CFR 75.253, THE SECRETARY CONSIDERS, AMONG OTHER THINGS, 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 GRANTEE HAS MADE SUBSTANTIAL PROGRESS TOWARD MEETING THE GOALS AND OBJECTIVES OF THE PROJECT;
4) THE SECRETARY ESTABLISHED PERFORMANCE MEASUREMENT REQUIREMENTS FOR THE GRANT IN THE APPLICATION NOTICE, THE PERFORMANCE TARGETS IN THE GRANTEE'S APPROVED APPLICATION;
5) THE RECIPIENT HAS SUBMITTED REPORTS OF PROJECT PERFORMANCE AND BUDGET EXPENDITURES THAT MEET THE REPORTING REQUIREMENTS FOUND AT 34 CFR 75.118, 2 CFR 200.328 AND 200.329, AND ANY OTHER REPORTING REQUIREMENTS ESTABLISHED BY THE SECRETARY; AND
6) THE GRANTEE HAS MAINTAINED FINANCIAL AND ADMINISTRATIVE MANAGEMENT SYSTEMS THAT MEET THE REQUIREMENTS IN 2 CFR 200.302, FINANCIAL MANAGEMENT, AND 2 CFR 200.303, INTERNAL CONTROLS.

IN ACCORDANCE WITH 2 CFR 200.308(c)(2) 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.

(2) 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.

US Department of Education
Washington, D.C. 20202

GRANT AWARD NOTIFICATION

If subawards are permitted under this grant, and you choose to make subawards, 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. (See 2 CFR 200.331(a))
2. The term does not include your procurement of property and services needed to carry out the project or program (The payments received for goods or services provided as a contractor are not Federal awards, see 2 CFR 200.501(f) of the OMB Uniform Guidance: "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards").
3. A subaward may be provided through any legal agreement, including an agreement that you or a subrecipient considers a contract. (See 2 CFR 200.1)

(3) Reimbursement of indirect costs is subject to the availability of funds and statutory and regulatory restrictions. The negotiated indirect cost rate agreement authorizes a non-Federal entity to draw down indirect costs from the grant awards. The following conditions apply to the below entities.

A. All entities (other than institutions of higher education (IHE))

The GAN for this grant award shows the indirect cost rate that applies on the date of the initial grant for this project. However, after the initial grant date, when a new indirect cost rate agreement is negotiated, the newly approved indirect cost rate supersedes the indirect cost rate shown on the GAN for the initial grant. This new indirect cost rate should be applied according to the period specified in the indirect cost rate agreement, unless expressly limited under EDGAR or program regulations. Any grant award with an approved budget can amend the budget to account for a change in the indirect cost rate. However, for a discretionary grant award any material changes to the budget which may impact the scope or objectives of the grant must be discussed with the program officer at the Department. See 34 CFR 75.560 (d)(3) (ii) (part 75 of EDGAR).

B. Institutions of higher education (IHE)

Under 2 CFR part 200, Appendix III, Indirect (F&A) Costs Identification and Assignment, and Rate Determination for Institutions of Higher Education (IHEs), the Department must apply the negotiated indirect cost rate in effect on the date of the initial grant award to every budget period of the project, including all continuation grants made for this project. See 2 CFR Part 200, Appendix III, paragraph C.7. Therefore, the GAN for each continuation grant will show the original indirect cost rate and it applies to the entire period of performance of this project. If the indirect cost rate agreement that is applicable to this grant does not extend to the end of the grant s project period, the indirect cost rate set at the start of the project period must still be applied to the end of project period regardless of the fact that the rate has otherwise expired.

Name: Kyla Johnson-Trammell
Position: Superintendent & Secretary, Board of Education

Sign: Date: 12/15/2023

Mike Hutchinson, President, Board of Education

AUTHORIZING OFFICIAL

12/15/2023

DATE

Ver. 1

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 or name of the primary organizational unit that was identified in the application, state plan or other documents required to be submitted for funding by the grant program.

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." The PR/Award Number is also known as the Federal Award Identifying Number, or FAIN.

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. If this award was made under a Research and Development grant program, the terms RESEARCH AND DEVELOPMENT will appear under 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 businessmanagement 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.

UEI - The UEI, issued in SAM.gov, is a unique 12 character organization identifier assigned to each recipient for payment purposes.

***REGULATIONS -** Title 2 of the Code of Federal Regulations(CFR), Part 200 as adopted at 2 CFR 3474; the applicable parts of the Education Department General Administrative Regulations (EDGAR), specific program regulations (if any), and other titles of the CFR 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 Grants Management System (G5) 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.

***PARTICIPANT NUMBER -** The number of eligible participants the grantee is required to serve during the budget year.

***GRANTEE NAME -** The entity name and address registered in the System for Award Management (SAM). This name and address is tied to the UEI registered in SAM under the name and address appearing in this field. This name, address and the associated UEI is what is displayed in the SAM Public Search.

***PROGRAM INDIRECT COST TYPE -** The type of indirect cost permitted under the program (i.e. Restricted, Unrestricted, or Training).

***PROJECT INDIRECT COST RATE -** The indirect cost rate applicable to this grant.

***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.

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* 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

Kilian Betlach
Oakland Unified School District
1011 Union Street

Oakland, CA 94607

SUBJECT: Payee Verification for Grant Award S424G230030

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

Grantee UEI: U871PCLAXAD7
Grantee Name: OAKLAND UNIFIED SCHOOL DISTRICT

Payee UEI: U871PCLAXAD7
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

SPECIFIC GRANT TERMS AND CONDITIONS FOR FINANCIAL AND PERFORMANCE REPORTS

PERFORMANCE REPORTS:

(1) FINAL REPORTS - ALL RECIPIENTS are required to submit a final performance report within 120 days after the expiration or termination of grant support in accordance with submission instructions provided in box 10 of the Grant Award Notification (GAN), or through another notification provided by the Department of Education (Department) (2 CFR § 200.329(c)).

(2) ANNUAL, QUARTERLY, or SEMIANNUAL REPORTS - ALL RECIPIENTS of a multi-year discretionary award must submit an annual Grant Performance Report (34 CFR § 75.118). The annual performance report shall provide the most current performance and financial expenditure information that is sufficient to meet the reporting requirements of 2 CFR §§ 200.328, 200.329, and 34 CFR § 75.720.

Your education program contact will provide you with information about your performance report submissions, including the due date, as a grant term or condition in box 10 on the GAN, or through another notification provided by the Department. The grant term or condition in box 10 on the GAN or another notification may reflect any of the following:

1. That a performance report is due before the next budget period begins. The report should contain current performance and financial expenditure information for this grant. It will either identify the date the performance report is due or state that the Department will provide additional information about this report, including due date, at a later time.

2. That an interim performance report is required because of the nature of the award or because of statutory or regulatory provisions governing the program under which this award is made, and that the report is due more frequently than annually as indicated, e.g., due quarterly and submitted within 30 days after the end of each quarter, or due semiannually and submitted within 30 days after the end of each 6-month period (2 CFR § 200.329(c)(1)).

3. That other reports are required, e.g., program specific reports required in a program's statute or regulation.

(3) FINANCIAL REPORTS – SOME RECIPIENTS:

If a financial report is required, your education program contact will provide you with information about your financial report submission, including the due date, as a grant term or condition in box 10 on the GAN, or through another notification.

A Standard Form (SF) 425 Federal Financial Report (FFR) is required if:

1. A grant involves cost sharing, and the ED 524B, which collects cost sharing information, is not submitted or a program-specific report approved by U.S. Office of Management and Budget (OMB) does not collect cost sharing information;
2. Program income was earned;

3. Indirect cost information is to be reported and the ED 524B was not used or a program-specific report approved by OMB does not collect indirect cost information;
4. Program regulations or statute require the submission of the FFR; or
5. Specific Award Conditions, or specific grant or subgrant conditions for designation of "high risk," were imposed in accordance with 2 C.F.R. part 200.208 and part 3474.10 and required the submission of the FFR.

If the FFR is required, the notification may indicate one of the following (see the form and its instructions at Standard Form (SF) 425 Federal Financial Report (FFR)):

1. Quarterly - FFRs are required for reporting periods ending on 12/31, 03/31, 06/30, 09/30, and are due within 30 days after each reporting period.

2. Semi-annual - FFRs are required for reporting periods ending on 03/31 and 09/30, and are due within 30 days after each reporting period.

3. Annual - FFRs are required for reporting period ending 09/30, and is due within 30 days after the reporting period.

4. Final - In coordination with the submission of final performance reports, FFRs are due within 120 days after the project or grant period end date (2 CFR 200.328).

When completing an FFR for submission, the following must be noted:

1. *Multiple Grant Reporting Using SF 425A Prohibited:* While the FFR is a governmentwide form that is designed for single grant and multiple grant award reporting, the Department's policy is that multiple grant award reporting is not permitted for Department grants. Thus, a Department grantee that is required to submit an FFR in accordance with any of the above referenced selections must complete and submit one FFR for each of its grants. Do not use the FFR attachment (Standard Form 425A), which is available for reporting multiple grants, for reporting on Department grants. As such, references to multiple grant reporting and to the FFR attachment in items 2, 5 and 10 of the FFR are not applicable to Department grantees. With regards to item 1 of the note found in the FFR Instructions, a grantee must complete items 10(a) through 10(o) for each of its grants. The multiple award, multiple grant, and FFR attachment references found in items 2, 5, 6, before 10(a), in item 10(b), before 10(d), before 10(i) and before 10(l) of the Line Item Instructions for the FFR are not applicable to Department grants.

2. *Program Income*: Unless disallowed by statute or regulation, a grantee will complete item 10(m) or 10(n) in accordance with the options or combination of options as provided in 2 CFR Part 200.307. A grantee is permitted, in accordance with 2 CFR Part 200.307, to add program income to its Federal share to further eligible project or program objectives, use program income to finance the non-Federal share of the project or program; and deduct program income from the Federal share of the total project costs.

3. *Indirect Costs:* A grantee will complete item 11(a) by listing the indirect cost rate type identified on its indirect cost rate agreement, as approved by its cognizant agency for indirect costs.

A Department grantee that does not have an indirect cost rate agreement approved by its cognizant agency for indirect costs, and that is using the Department approved (beyond the 90-day temporary period) temporary indirect cost rate of 10% of budgeted direct salaries and wages, or the de minimis rate of 10% of modified total direct cost (MTDC) must list its indirect cost rate in 11(a) as a Department Temporary Rate or De Minimis Rate. The de minimis rate of 10% of MTDC consists of:

> All direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and subawards and contracts up to the first $25,000 of each subaward (i.e., subgrant). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of $25,000. Other items, including contract costs in excess of $25,000, may be excluded when necessary to avoid a serious inequity in the distribution of indirect costs (see definition of MTDC at 2 CFR § 200.1).

A training program grantee whose recovery of indirect cost limits indirect cost recovery to 8% of MTDC or the grantees negotiated indirect cost rate, whichever is less in accordance with EDGAR § 75.562 (c), must list its rate in 11(a) as a Department Training Grant Rate. The 8% limit does not apply to agencies of Indian tribal governments, local governments, and States[1] as defined in 2 CFR § 200.1

A restricted program grantee must list its rate as a Restricted Indirect Cost Rate in 11(a). A restricted program (i.e., programs with statutory supplement-not-supplant requirements) grantee must utilize a restricted indirect cost rate negotiated with its cognizant agency for indirect costs, or may elect to utilize a restricted indirect cost rate of 8% MTDC if their negotiated restricted indirect cost rate calculated under 34 CFR 75.563 and 76.564 – 76.569, is not less than 8% MTDC. A State or local government[2] that is a restricted program grantee may not elect to utilize the 8% MTDC rate. Additionally, restricted program grantees may not utilize the de minimis rate, but may utilize the temporary rate until a restricted indirect cost rate is negotiated. If a restricted program grantee elects to utilize the temporary rate, it must list its rate as a Department Temporary Rate in 11(a).

Grantees with indirect cost rates prescribed in program statute or regulation must list their rate as a Rate Required in Program Statute or Regulation in 11(a). Grantees are required to follow program-specific statutory or regulatory requirements that mandate either indirect cost rate type or maximum administrative costs recovery.

For detailed information including restrictions related to temporary, de minimis, training, restricted, and program prescribed indirect cost rates see GAN ATTACHMENT 4.

4. *Supplemental Pages:* If grantees need additional space to report financial information, beyond what is available within the FFR, they should provide supplemental pages. These additional pages must indicate the following information at the top of each page: the PR/Award Number

[1] Note that a State-funded institution of higher education is not considered a "State government" for these purposes; and a Tribal college or university funded by a federally-recognized Tribe is not considered a Tribe for these purposes.
[2] Note that a State-funded institution of higher education is not considered a "State government" for these purposes.

also known as the Federal Identifying Number or FAIN, recipient organization, Unique Entity Identifier, Employer Identification Number (EIN), and period covered by the report.

AN OVERVIEW OF SINGLE AUDIT REQUIREMENTS OF STATES, LOCAL GOVERNMENTS, AND NONPROFIT ORGANIZATIONS

This GAN ATTACHMENT is **not** applicable to for-profit organizations. For-profit organizations comply with audit requirements specified in block 10 of their Grant Award Notification (GAN).

Summary of Single Audit Requirements for States, Local Governments and Nonprofit Organizations:

1. Single Audit. A non-Federal entity (a State, local government, Indian tribe, Institution of Higher Education (IHE)[1], or nonprofit organization) that expends $750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single audit conducted in accordance with 2 CFR 200.501, "Audit Requirements," except when it elects to have a program specific audit conducted.

2. Program-specific audit election. When an auditee expends Federal awards under only one Federal program (excluding research and development (R&D)), and the Federal program's statutes, regulations, or the terms and conditions of the Federal award 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.

3. Exemption when Federal awards expended are less than $750,000. A non-Federal entity that expends less than $750,000 during the non-Federal entity's fiscal year in Federal awards is exempt from Federal audit requirements for that year, except as noted in 2 CFR 200.503, but records must be available for review or audit by appropriate officials of the Federal agency, pass-through entity, and Government Accountability Office (GAO). Generally, grant records must be maintained for a period of three years after the date of the final expenditure report (2 CFR § 200.334)

4. Federally Funded Research and Development Centers (FFRDC). Management of an auditee that owns or operates a FFRDC may elect to treat the FFRDC as a separate entity.

5. Report Submission. To meet audit requirements of U.S. Office of Management and Budget (OMB) Uniform Guidance: Cost Principles, Audit, and Administrative Requirements for Federal Awards (Uniform Guidance), grantees must submit all audit documents required by Uniform Guidance 2 CFR 200.512, including Form SF-SAC: Data Collection Form electronically to the Federal Audit Clearinghouse at:

[1] As defined under the Higher Education Act of 1965, as amended (HEA) section 101.

https://facides.census.gov/Account/Login.aspx.

The audit must be completed, and the data collection form and reporting package must be submitted within the earlier of 30 calendar days after receipt of the auditor's report(s), or nine months after the end of the audit period. If the due date falls on a Saturday, Sunday, or Federal holiday, the reporting package is due the next business day. Unless restricted by Federal statutes or regulations, the auditee must make copies available for public inspection. Auditees and auditors must ensure that their respective parts of the reporting package do not include protected personally identifiable information. (2 CFR 200.512)

Grantees are strongly urged to obtain the "OMB 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 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 Single Audits, including addresses, phone numbers, fax numbers, and e-mail addresses for technical assistance.

For single audit-related questions, if the U.S. Department of Education is the cognizant agency, grantees should contact the Non-Federal Audit Team in the Department's Office of Inspector General, at oignon-federalaudit@ed.gov. Additional resources for single audits are also available on the Non-Federal Audit Team's website at https://www2.ed.gov/about/offices/list/oig/nonfed/index.html. For programmatic questions, grantees should contact the education program contact shown on the Department's GAN.

Grantees can obtain information on single audits from:

The OMB website at www.omb.gov. Look under Office of Management and Budget (in right column) then click Office of Federal Financial Management (to obtain OMB Compliance Supplement). The SF-SAC: Data Collection Form can be found at the Federal Audit Clearinghouse at: https://facides.census.gov/Files/2019-2021%20Checklist%20Instructions%20and%20Form.pdf.

The American Institute of Certified Public Accountants (AICPA) has illustrative OMB Single Audit report examples that might be of interest to accountants, auditors, or financial staff at www.aicpa.org.

REQUEST FOR APPROVAL OF PROGRAM INCOME

In projects that generate program income, the recipient calculates the amount of program income according to the guidance given in 2 CFR Part 200.307.

***** 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 2 CFR Part 200.307, 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 allowable cost to determine the net allowable costs.

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.

FEDERAL FUNDING ACCOUNTABILITY TRANSPARENCY ACT
REPORTING SUBAWARDS AND EXECUTIVE COMPENSATION

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 Department of Education (Department) grant recipients:

1. Report **first-tier subawards** made under Federal grants that are funded at $30,000 or more that meet the reporting conditions as set forth in this grant award term;
2. Report their executives' compensation for all new Federal grants that are funded at $30,000 and that meet the reporting conditions as set forth in this grant award term; and
3. Report executive compensation data for their **first-tier subrecipients** that meet the reporting conditions as set forth in this grant award term.

For FFATA reporting purposes, the Department grant recipient is the entity listed in box 1 of the Grant Award Notification.

Only **first-tier subawards** made by the Department grant recipient to its **first-tier subrecipients** and the **first-tier subrecipients'** executive compensation are required to be reported in accordance with FFATA.

Subaward, Subrecipient, Recipient, Total Compensation, Executives, and other key terms, are defined within item 5, Definitions, of this grant award term.

This grant award term is issued in accordance with 2 CFR Part 170—Reporting Subaward And Executive Compensation Information.

1. *Reporting of First-tier Subawards -*

a. *Applicability and what to report.*

Unless you are exempt as provided item 4, Exemptions, of this grant award term, you must report each obligation that **equals or exceeds $30,000** in Federal funds for a first-tier subaward to a non-Federal entity or Federal agency.

You must report the information about each obligating action that are specified in the submission instructions posted at FSRS.

b. *Where and when to report.*

The Department grant recipient must report each obligating action described in paragraph **1.a.** of this award term to FSRS.

Report subaward information no later than the end of the month following the month in which the subaward obligation was made. For example, if the obligation was made on November 7, 2020, the obligation must be reported by no later than December 31, 2020.

2. *Reporting Total Compensation of the Department's Grant Recipients' Executives -*

a. *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 Federal award **equals or exceeds $30,000**;

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**,
C. 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 SEC Investor.gov Executive Compensation.)

b. *Where and when to report.*

You must report executive total compensation described in paragraph **2.a.** of this grant award term:

i. As part of your registration profile at SAM.gov.

ii. By the end of the month following the month in which this award is made (for example, if the obligation was made on November 7, 2020 the executive compensation must be reported by no later than December 31, 2020), and annually thereafter.

3. ***Reporting of Total Compensation of Subrecipient Executives –***

a. *Applicability and what to report.*

Unless you are exempt as provided in item 4, Exemptions, of this award term, for each first-tier **non-Federal entity** subrecipient under this award, you shall report the names and total compensation of each of the subrecipient's five most highly compensated executives for the subrecipient's preceding completed fiscal year, if—

i. In the subrecipient's preceding fiscal year, the subrecipient received—

A. 80 percent or more of its 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**,
C. 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 SEC Investor.gov Executive Compensation.)

b. *Where and when to report.*

You must report subrecipient executive total compensation described in paragraph **3.a.** of this grant award term:

i. In FSRS. You must include a condition on subawards that requires the subrecipients to timely report the information required under paragraph **3.a.** to you the prime awardee, or in the SAM.gov. Subrecipient executive compensation entered in SAM.gov by the subrecipient will pre-populate in FSRS, so you do not have to report when subrecipients enter this information in SAM.gov. Subrecipient executive compensation not entered in SAM.gov by the subrecipient is reported in FSRS by you the Department grant recipient.

ii. By the end of the month following the month during which you make the subaward. For example, if the subaward obligation was made on November 7, 2020 the subrecipient's executive compensation must be reported by no later than December 31, 2020.

4. *Exemptions –*

a. If, in the previous tax year, you had gross income, from all sources, under $300,000, you are exempt from the requirements to report:

i. Subawards, and

ii. The total compensation of the five most highly compensated executives of any **subrecipient**.

5. *Definitions -*

a. For purposes of this award term:

i. Federal *Agency* means a Federal agency as defined at 5 U.S.C. 551(1) and further clarified by 5 U.S.C. 552(f).

ii. Non-Federal *Entity* means all of the following, as defined in 2 CFR part 25:

A Governmental organization, which is a State, local government, or Indian tribe;

A foreign public entity;

A domestic or foreign nonprofit organization; and,

A domestic or foreign for-profit organization

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

iv. *Obligation*, when used in connection with a non-Federal entity's utilization of funds under a Federal award, means orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-Federal entity during the same or a future period.

v. *Subaward:*

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.

The term does not include your procurement of property and services (such as payments to a contractor, small purchase agreements, vendor agreements, and consultant agreements) that are needed for the benefit of the prime awardee to carry out the project or program (for further explanation, see 2 CFR 200.331). For example, the following are not considered subawards:

Cleaning Vendors: Vendors that are hired by a grantee to clean its facility.
Payroll Services Vendors: Vendors that carryout payroll functions for the grantee.
Information Technology Vendors: Vendors that provide IT support to grant staff.

Payments to individuals that are beneficiaries of Federal programs are not considered subawards.

A subaward may be provided through any legal agreement, including an agreement that you or a subrecipient considers a contract.

v. *Subrecipient* means a non-Federal entity or Federal agency that:

Receives a subaward from you (the recipient) under this award; and

Is accountable to you for the use of the Federal funds provided by the subaward.

In accordance with its subaward, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the Department prime awardee.

vii. *Recipient* means a non-Federal entity that receives a Federal award directly from a Federal awarding agency to carry out an activity under a Federal program. The term recipient does not include subrecipients. See also §200.69 Non-Federal entity.

viii. *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)):

Salary and bonus.

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.

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.

Change in pension value. This is the change in present value of defined benefit and actuarial pension plans.

Above-market earnings on deferred compensation which is not tax-qualified.

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.

SPECIFIC 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) the 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 116-260, Consolidated Appropriations Act, 2021.

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.

REGISTRATION OF UNIQUE ENTITY IDENTIFIER (UEI) NUMBER AND TAXPAYER IDENTIFICATION NUMBER (TIN) IN THE SYSTEM FOR AWARD MANAGEMENT (SAM)

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

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 UEI number is not currently registered with the SAM, you can easily register by going to 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 UEI 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

1. Requirement for System for Award Management (SAM)

Unless you are exempted from this requirement under 2 CFR 25.110, you are, in accordance with your grant program's Notice Inviting Applications, required to maintain an active SAM registration with current information about your organization, including information on your immediate and highest level owner and subsidiaries, as well as on all predecessors that have been awarded a Federal contract or grant within the last three years, if applicable, at all times during which you have an active Federal award or an application or plan under consideration by a Federal awarding agency. To remain registered in the SAM database after your initial registration, you are required to review and update your information in the SAM database on an annual basis from the date of initial registration or subsequent updates to ensure it is current, accurate and complete.

2. Requirement for Unique Entity Identifier (UEI) Numbers

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

1. Must notify potential subrecipients that they may not receive a subaward from you unless they provided their UEI number to you.
2. May not make a subaward to a subrecipient when the subrecipient fails to provide its UEI number to you.

3. Definitions

For purposes of this award term:

1. System for Award Management (SAM) means the Federal repository into which a recipient 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 https://www.sam.gov).

2. Unique Entity Identifier (UEI) means the identifier assigned by SAM registration to uniquely identify business entities.

3. Recipient means a non-Federal entity that receives a Federal award directly from a Federal awarding agency to carry out an activity under a Federal program. The term recipient does not include subrecipients. See 2 CFR 200.86.

4. Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract. See 2 CFR 200.92.

5. Subrecipient means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency. See 2 CFR 200.93.

KEY FINANCIAL MANAGEMENT REQUIREMENTS FOR DISCRETIONARY GRANTS AWARDED BY THE DEPARTMENT OF EDUCATION

The Department expects grantees to administer Department 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, grantees may use grant funds only for obligations incurred during the funding period.

Title 2 of the Code of Federal Regulations Part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards," establishes requirements for Federal awards made to non-Federal entities. The Education Department General Administrative Regulations in 34 CFR (EDGAR) 75, 76, 77, 79, 81, 82, 84, 86, 97, 98, and 99 contain additional requirements for administering discretionary grants made by this Department. The most recent version of these regulations may be accessed at the following URLs:

The Education Department General Administrative Regulations (EDGAR)

2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

The information on page 2, "Selected Topics in Administering Department Discretionary Grants," highlights major administrative requirements of 2 CFR Part 200. In addition, a few of the topics discuss requirements that the Department imposes on its discretionary grantees under EDGAR, Part 75 (Direct Grants). The specific sections of 2 CFR Part 200 and of EDGAR that address the topics discussed are shown in parentheses. The Department urges grantees to read the full text of these and other topics in EDGAR and in 2 CFR Part 200.

Grantees are reminded 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. Grantees should become familiar with those requirements as well, because program-specific requirements might differ from those in 2 CFR Part 200 and in EDGAR.

The Department recommends 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.

Grantees may direct any questions regarding the topics discussed on page 2, "Selected Topics in Administering Department Discretionary Grants,"or about any other aspect of administering your grant award to the Department program staff person named in Block 3 of the Grant Award Notification.

SELECTED TOPICS IN ADMINISTERING DEPARTMENT DISCRETIONARY GRANTS

I. Financial Management Systems (2 CFR Part 200.302)

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. Federal Payment (2 CFR Part 200.305)

Under this part --

- 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, generally, must maintain advance payments of Federal awards 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 Department G5 Payment System at the time those funds are needed for payments to vendors and employees.

III. Personnel (EDGAR §§ 75.511-75.519 and 2 CFR Part 200 Subpart D and E)

The rules governing personnel costs are located in EDGAR Part 75 and 2 CFR Part 200 Subparts D and E. Part 75 covers issues such as paying consultants with grant funds, prohibiting dual compensation of staff, and waiving the requirement for a full-time project director. The rules clarifying changes in key project staff are located in 2 CFR Part 200.308 (c)(2). General rules governing reimbursement of salaries and compensation for staff working on grant projects are addressed in the cost principles in 2 CFR Part 200 Subpart D and E. 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 (2 CFR Part 200 Subpart E)

All costs incurred under any grant are subject to the cost principles found in 2 CFR Part 200 Subpart E. The cost principles provide lists of selected items of allowable and unallowable costs, and must be used in determining the allowable costs of work performed under the grant.

V. Procurement Standards (2 CFR Part 200.317-327)

Under 2 CFR Part 200.317, States are required to follow the procurement rules the States have established for purchases funded by non-Federal sources. When procuring goods and services for a grant's 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 (EDGAR §§75.560-564 and 2 CFR Part 200.414)

In addition to the information presented beslow, see GAN ATTACHMENT 4 for addional information including restrictions related to temporary, de minimis, training, restricted, and program prescribed indirect cost rates.

A. Unrestricted Indirect Cost Rate

To utilize an unrestricted indirect cost rate, a grantee must have an indirect cost agreement with its cognizant agency, submit an indirect cost rate proposal to its cognizant agency for indirect

costs (cognizant agency) within 90 days after the award of this grant or elect to utilize the de minimis rate under 2 CFR § 200.414(f) or the temporary indirect cost rate (subject to limitations described below).

The grantee must provide proof of its negotiated indirect cost rate agreement to the Department as soon as it has signed such an agreement with its cognizant agency.

B. Temporary Indirect Cost Rate

A grantee that does not have a current negotiated indirect cost rate agreement may recover indirect costs at a temporary rate, which is limited to 10% of budgeted direct salaries and wages (See 34 CFR § 75.560(c)); or it may choose not to charge indirect costs to the grant. The temporary rate can only be used for 90 days unless the exceptional circumstances apply under 34 CFR § 75.560(d)(2).

If the grantee has not submitted its indirect cost proposal to its cognizant agency within the 90-day period, it may no longer recover indirect costs utilizing the temporary indirect cost rate until it has negotiated an indirect cost rate agreement with its cognizant agency. Once a grantee obtains a federally recognized indirect cost rate that is applicable to this grant, the grantee may use that indirect cost rate to claim indirect cost reimbursement.

C. De minimis Indirect Cost Rate

Institutions of Higher Education (IHEs), federally-recognized Indian Tribes, State and Local Governments[1] receiving less than $35 million in direct federal funding, and nonprofit organizations, if they do not have a current negotiated (including provisional) rate, and are not subject to the Department's training rate or restricted rate (supplement-not-supplant provisions) may elect to charge a de minimis indirect cost rate of 10% of modified total direct costs (MTDC). This rate may be used indefinitely.

MTDC consists of all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and subawards and contracts up to the first $25,000 of each subaward (i.e., subgrant). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward in excess of $25,000. Other items, including contract costs in excess of $25,000, may be excluded when necessary to avoid a serious inequity in the distribution of indirect costs (see definition of MTDC at 2 CFR § 200.1).

Additionally, the de minimis rate may not be used by grantees that are subject to the Department's training indirect cost rate (34 CFR § 75.562) or restricted indirect cost rate. The de minimis rate may be used indefinitely. However, if a grantee chooses to use the de minimis rate to recover indirect costs, it must do so for all of its Federal awards until such time as the grantee negotiates an indirect cost rate with its cognizant agency. Once a grantee obtains a federally recognized indirect cost rate that is applicable to this grant, the grantee may use that indirect cost rate to claim indirect cost reimbursement.

[1] Note that a State-funded institution of higher education is not considered a "State government" for these purposes.

D. Programs with a Supplement-not-supplant requirement (restricted indirect cost rate)

A restricted program (i.e., programs with statutory supplement-not-supplant requirements) grantee must utilize a restricted indirect cost rate negotiated with its cognizant agency for indirect costs, or may elect to utilize a restricted indirect cost rate of 8% MTDC if their negotiated restricted indirect cost rate calculated under 34 CFR 75.563 and 76.564 – 76.569, is not less than 8% MTDC. A State or local government[2] that is a restricted program grantee may not elect to utilize the 8% MTDC rate. Additionally, restricted program grantees may not utilize the de minimis rate, but may utilize the temporary rate until a restricted indirect cost rate is negotiated.

E. Training Grant Indirect Cost Rate

If the grantee is a training grant recipient and is not a State, local, or Tribal government[3], the grantee must negotiate a rate under 34 CFR 75.562. This provision limits indirect cost recovery to 8% of modified total direct costs or the grantees negotiated indirect cost rate, whichever is less.

The recovery using the training grant indirect cost rate is subject to the following limitations:

i. The lesser of the 8% indirect cost rate or negotiated indirect cost rate also applies to sub-awards that fund training.
ii. The 8% limit does not apply to agencies of Indian tribal governments, local governments, and States as defined in 2 CFR § 200.1, respectively.
iii. Indirect costs in excess of the 8% limit may not be charged directly, used to satisfy matching or cost-sharing requirements, or charged to another Federal award.
iv. A grantee using the training rate of 8% is required to have documentation available for audit that shows that its negotiated indirect cost rate is at least 8%.

F. Program-Specific Indirect Cost Rate

Grantees are required to follow program-specific statutory or regulatory requirements that mandate either indirect cost rate type or maximum administrative costs recovery instead of the general requirements described here.

VII. Audit Requirements (2 CFR Part 200 Subpart F)

2 CFR 200 Subpart F requires that grantees that are non-Federal entities (a State, local government, Indian tribe, IHE, or nonprofit organization that carries out a Federal award as a recipient or subrecipient) obtain a non-Federal audit of their expenditures under their Federal grants if the grantee expends more than $750,000 in Federal funds in one fiscal year. 2 CFR Part 200 Subpart F contains the requirements imposed on grantees for

[2] Note that a State-funded institution of higher education is not considered a "State government" for these purposes.
[3] Note that a State-funded institution of higher education is not considered a "State government" for these purposes; and a Tribal college or university funded by a federally-recognized Tribe is not considered a Tribe for these purposes.

audits done in connection with the law.

The Department recommends hiring auditors who have specific experience in auditing Federal awards under the regulations and the Compliance Supplement.

VIII. Other Considerations

Some other topics of financial management covered in 2 CFR Part 200 that might affect particular grants include program income (2 CFR Part 200.307), cost sharing or matching (2 CFR Part 200.306), property management requirements for equipment and other capital expenditures (2 CFR Parts 200.313, 200.439).

MEMORANDUM TO ED DISCRETIONARY GRANTEES

You are receiving this memorandum to remind you of Federal requirements, found in 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements,* regarding cash drawdowns under your grant account.

For any cash that you draw from your Department of Education (*the* Department) 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. 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 the Department's G5 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:

- subjected to specific award conditions or designated as a "high-risk" grantee [2 CFR Part 200.208 and 2 CFR 3474.10], 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.

You are urged to read 2 CFR Part 200.305 to learn more about Federal requirements related to grant payments and 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.

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 200 Subpart E of the, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards." 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.
- 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.

MEMORANDUM TO REMIND DEPARTMENT OF EDUCATION GRANTEES OF EXISTING CASH MANAGEMENT REQUIREMENTS CONCERNING PAYMENTS

The Department of Education (Department) requires that its grantees adhere to existing cash management requirements concerning payments and will ensure that their subgrantees are also aware of these policies by providing them relevant information. A grantee's failure to comply with cash management requirements may result in an improper payment determination by the Department in accordance with the Payment Integrity Information Act (PIIA) of 2019.

There are three categories of payment requirements that apply to the drawdown of funds from grant accounts at the Department. The first two types of payments are subject to the requirements in the Treasury Department regulations implementing the Cash Management Improvement Act (CMIA) of 1990, 31 U.S.C.6513, and the third is subject to the requirements in the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance) at 2 CFR part 200,[1] as follows:

1. Payments to a State under programs that are covered by a State's Treasury State Agreement (TSA);

2. Payments to States under programs that are not covered by a TSA; and

3. Payments to other non-Federal entities, including nonprofit organizations and local governments.

CMIA Requirements Applicable to Programs included in a TSA

Generally, under the Treasury Department regulations implementing the CMIA, only major assistance programs (large-dollar programs meeting thresholds in 31 CFR § 205.5) are included in a State's written TSA. See 31 CFR § 205, subpart A. Programs included in a TSA must use approved funding techniques and both States and the Federal government are subject to interest liabilities for late payments. State interest liabilities accrue from the day federal funds are credited to a State account to the day the State pays out the federal funds for federal assistance program purposes. 31 CFR § 205.15. If a State makes a payment under a Federal assistance program before funds for that payment have been transferred to the State, Federal Government interest liabilities accrue from the date of the State payment until the Federal funds for that payment have been deposited to the State account. 31 CFR § 205.14.

CMIA Requirements Applicable to Programs Not Included in a TSA

Payments to States under programs not covered by a State's TSA are subject to subpart B of Treasury's regulations in 31 CFR § 205. These regulations provide that a State must minimize the time between the drawdown of funds from the federal government and their disbursement for approved program activities. The timing and amount of funds transfers must be kept to a minimum and be as close as is administratively feasible to a State's actual cash outlay for direct program costs and the proportionate share of any allowable indirect costs. 31 CFR § 205.33(a). States should exercise sound cash management in funds transfers to subgrantees.

[1] The Department adopted the Uniform Guidance as regulations of the Department at 2 CFR part 3474.

Under subpart B, neither the States nor the Department owe interest to the other for late payments. 31 CFR § 205.33(b). However, if a State or a Federal agency is consistently late in making payments, Treasury can require the program to be included in the State's TSA. 31 CFR § 205.35.

Fund transfer requirements for grantees other than State governments and subgrantees

The transfer of Federal program funds to grantees other than States and to subgrantees are subject to the payment and interest accrual requirements in the Uniform Guidance at 2 CFR § 200.305(b). These requirements are like those in subpart B of the Treasury Department regulations in 31 CFR part 205, requiring that "payments methods must minimize the time elapsing between the transfer of funds from the United States Treasury or the pass-through entity and the disbursement by the non-Federal entity." 2 CFR § 200.305(b) introduction.

The Federal Government and pass-through entities must make payments in advance of expenditures by grantees and subgrantees if these non-Federal entities maintain, or demonstrate the willingness to maintain, written procedures "that minimize the time elapsing between the transfer of funds and disbursement by the non-Federal entity, and financial management systems that meet the standards for fund control and accountability." 2 CFR § 200.305(b)(1). If a grantee or subgrantee cannot meet the criteria for advance payments, a Federal agency or pass-through entity can pay that entity through reimbursement. See 2 CFR § 200.305(b)(1) and (4) for more detailed description of the payment requirements and the standards for requiring that payments be made by reimbursement.

Non-Federal entities must maintain advance payments in interest bearing accounts unless certain conditions exist. See 2 CFR § 200.305(b)(8) for those conditions. The requirements regarding interest accrual and remittance follow:

Grantees and subgrantees must annually remit interest earned on federal advance payments except that interest earned amounts up to $500 per year may be retained for administrative expense. Any additional interest earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually to the Department of Health and Human Services Payment Management System (PMS) through an electronic medium using either Automated Clearing House (ACH) network or a Fedwire Funds Service payment. 2 CFR § 200.305(b)(9)(i) and (ii).

1. When returning interest through ACH Direct Deposit or Fedwire, grantees must include the following in their return transaction:

    - PMS Account Number (PAN). NOTE: The PAN is the same series of alpha-numeric characters used for payment request purposes (e.g.: C1234G1).
    - PMS document number.
    - The reason for the return (e.g., interest, part interest part other, etc.).
    - An explanation stating that the refund is for interest payable to the Department of Health and Human Services, and the grant number(s) for which the interest was earned.

    a. U.S. Department of Education grantees are generally located and operate domestically and return interest domestically. Below is PSC ACH account information for interest returned

domestically. For international ACH interest returned, account information is available at: Returning Funds/Interest.

- PSC ACH Routing Number is: 051036706
- PSC DFI Accounting Number: 303000
- Bank Name: Credit Gateway - ACH Receiver
- Location: St. Paul, MN

b. Service charges may be incurred from a grantee's financial institution when a Fedwire to return interest is initiated. For FedWire returns, Fedwire account information is as follows:

- Fedwire Routing Number: 021030004
- Agency Location Code (ALC): 75010501
- Bank Name: Federal Reserve Bank
- Treas NYC/Funds Transfer Division
- Location: New York, NY

2. Interest may be returned by check using only the U.S. Postal Service; however, returning interest via check may take 4-6 weeks for processing before a check payment may be applied to the appropriate PMS account.

a. Interests returned by check are to be mailed (USPS only) to:

- HHS Program Support Center
  PO Box 979132
  St. Louis, MO 63197

A brief statement explaining the nature of the return must be included.

b. To return interest on a grant not paid through the PMS, make the check payable to the Department of Health and Human Services, and include the following with the check:

- An explanation stating that the refund is for interest
- The name of the awarding agency
- The grant number(s) for which the interest was earned
- The return should be made payable to: Department of Health and Human Services.

3. For detailed information about how to return interest, visit the PSC Retuning Funds/Interest page at: Returning Funds/Interest

Grantees, including grantees that act as pass-through entities and subgrantees have other responsibilities regarding the use of Federal funds. For example, all grantees and subgrantees must have procedures for determining the allowability of costs for their awards. We highlight the following practices related to the oversight of subgrantee compliance with the financial management requirements in the Uniform Guidance that will assist State grantees (pass-through entities) in meeting their monitoring responsibilities. Under 2 CFR § 200.332, pass-through entities must –

1. Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring.

2. Monitor the performance and fiscal activities of the subrecipient to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.

A small number of Department 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 general cash management or payment requirements. If you have any questions about your specific grant, please contact the Education Program Contact listed in Block 3 of your Grant Award Notification.

RECIPIENTS OF DEPARTMENT OF EDUCATION GRANTS AND COOPERATIVE AGREEMENTS FREQUENTLY ASKED QUESTIONS ON CASH MANAGEMENT

Q What are the Federal Laws and Regulations Regarding Payments to the States?

A The *Cash Management Improvement Act of 1990* (*CMIA*) establishes interest liabilities for the Federal and State governments when the Federal Government makes payments to the States. See 31 U.S.C. 3335 and 6503. The implementing regulations are in Title 31 of the Code of Federal Regulations (CFR), Part 205, https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title31/31cfr205_main_02.tpl. Non-Federal entities other than States follow the rules on Federal payments set out in 2 CFR 200.305.

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 identifies the Federal assistance programs that are subject to interest liabilities under the CMIA. The CMIA regulations specify a number of different funding techniques that may be used by a State but a State can negotiate with the Treasury Department to establish a different funding technique for a particular program. A TSA is effective until terminated and, if a state does not have a TSA, payments to the State are subject to the default techniques in the regulations that Treasury determines are appropriate.

Q What are the CMIA requirements for a program subject to a Treasury-State Agreement?

A Payments to a State under a program of the Department are subject to the interest liability requirements of the CMIA if the program is included in the State's Treasury-State Agreement (TSA) with the Department of Treasury. If the Federal government is late in making a payment to a State, it owes interest to the State from the time the State spent its funds to pay for expenditure until the time the Federal government deposits funds to the State's account to pay for the expenditure. Conversely, if a State is late in making a payment under a program of the Department, the State owes interest to the Federal government from the time the Federal government deposited the funds to the State's account until the State uses those funds to make a payment. For more information, GAN Enclosure 4.

Q What are the CMIA requirements for a program that is not subject to a Treasury-State Agreement?

A If a program is not included in the State's TSA, neither the State nor the Federal government are liable for interest for making late payments. However, both the Federal government and the State must minimize the time elapsing between the date the State requests funds and the date that the funds are deposited to the State's accounts. The State is also required to minimize the time elapsed between the date it receives funds from the Federal government and the date it makes a payment under the program, Also, the Department must minimize the amount of funds transferred to a State to only that needed to meet the immediate cash needs of the State. The timing and amount of funds transferred must be as close as is administratively feasible to a State's actual cash outlay for direct program costs and the proportionate share of any allowable indirect costs.

Q What if there is no TSA?

A When a State does not have a TSA in effect, default procedures in 31 CFR, part 205 that the Treasury Department determines appropriate apply. 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.

Q Who is responsible for Cash Management?

A Grantees and subgrantees that receive grant funds under programs of the Department are responsible for maintaining internal controls regarding the management of Federal program funds under the Uniform Guidance in 2 CFR 200.302 and 200.303. In addition, grantees are responsible for ensuring that subgrantees are aware of the cash management and requirements in 2 CFR part 200, subpart D.

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

A Recipients must monitor their own cash drawdowns **and** those of their subrecipients to assure substantial compliance to the standards of timing and amount of advances.

Q How soon may I draw down funds from the G5 grants management system?

A Grantees are required to minimize the amount of time between the drawdown and the expenditure of funds from their bank accounts. (See 2 CFR 200.305(b).) Funds must be drawn only to meet a grantee's immediate cash needs for each individual grant. The G5 screen displays the following message:

By submitting this payment request, I certify to the best of my knowledge and belief that the request is based on true, complete, and accurate information. I further certify that the expenditures and disbursements made with these funds are for the purposes and objectives set forth in the applicable Federal award or program participation agreement, and that the organization on behalf of which this submission is being made is and will remain in compliance with the terms and conditions of that award or program participation agreement. I am aware that the provision of any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me, and the organization on behalf of which this submission is being made, to criminal, civil, or administrative penalties for fraud, false statements, false claims, or other violations. (U.S. Code Title 18, Section 1001; Title 20, Section 1097; and Title 31, Sections 3729-3730 and 3801-3812)

Q How may I use Federal funds?

A Federal funds must be used as specified in the Grant Award Notification (GAN) and the approved application or State plan for allowable direct costs of the grant and an allocable portion of indirect costs, if authorized.

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, including those in 2 CFR part 200, an assurance, the GAN, or elsewhere, the awarding agency may in accordance with 2 CFR 200.339 take one or more of the following actions:

1. Temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or pass-through entity.
2. Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity not in compliance.
3. Wholly or partly suspend or terminate the Federal award.
4. Initiate suspension or debarment proceedings as authorized under 2 CFR part 180 and Federal award agency regulations (or in the case of a pass-through be initiated by a Federal awarding agency).
5. Withhold further Federal awards for the project or program.
6. Take other remedies that may be legally available.

Q Who is responsible for determining the amount of interest owed to the Federal government?

A As set forth in 31 CFR 205.9, the method used to calculate and document interest liabilities is included in the State's TSA. A non-State entity must maintain advances of Federal funds in interest-bearing accounts unless certain limited circumstance apply and remit interest earned on those funds to the Department of Health and Human Services, Payment Management System annually. See 2 CFR 200.305.

Q What information should accompany my interest payment?

A In accordance with 2 CFR 200.305(b)(9), interest in access of $500.00 earned on Federal advance payments deposited in interest-bearing accounts must be remitted annually to the Department of Health and Human Services Payment Management System (PMS) through an electronic medium using either Automated Clearing House (ACH) network or a Fedwire Funds Service payment.

For returning interest on Federal awards paid through PMS, the refund should:
(a) Provide an explanation stating that the refund is for interest;
(b) List the PMS Payee Account Number(s) (PANs);
(c) List the Federal award number(s) for which the interest was earned; and
(d) Make returns payable to: Department of Health and Human Services.

For returning interest on Federal awards not paid through PMS, the refund should:
(a) Provide an explanation stating that the refund is for interest;
(b) Include the name of the awarding agency;
(c) List the Federal award number(s) for which the interest was earned; and
(d) Make returns payable to: Department of Health and Human Services.

For additional information about returning interest see GAN ATTACHMENT 4.

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 The payment requirements in 2 CFR 200.305(b) authorize a grantee or subgrantee to request funds in advance of expenditures if certain conditions are met. However, if those conditions are not met, the Department and a pass-through agency may place a payee on reimbursement.

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 A subgrantee must be paid in advance if it meets the standards for advance payments in 2 CFR 200.305(b)(1) but if the subgrantee cannot meet those standards, the State may put the subgrantee on reimbursement payment. See 2 CFR 200.305(b).

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

A Yes, before any shutdown of G5 lasting three days or more, the Department issues special guidance for drawing down funds during the shut down. 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.

Fostering Diverse Schools Project Narrative

Table of Contents

Table of Contents **1**
(a) Need for project **2**
(i) Problem to be addressed by the proposed project 2
(ii) Gaps or weaknesses in services, infrastructure, or opportunities and how the project will address them 9
Monica to add Opportunity Ticket story to this section - getting clarification - 9
(a) Enrollment Policy 9
(b) Pilot Project 10
(c) Willingness to attend non-neighborhood schools 13
(d) Diversity within our district 14
(e) Geography 17
(f) Community-supported college access for all OUSD students 18
(g) Charter schools 19
(b) Project design **19**
(i) Project goals, objectives, and outcomes 19
Goal 1: OUSD will develop a comprehensive plan for increasing socioeconomic diversity in our schools 20
Objective 1:1 - Engage Community 20
Objective 1:2 - Socioeconomic Segregation Report 20
Objective 1:3 - Comprehensive Plan 20
Objective 1:4 - Data Analysis 21
Objective 1:5 - Marketing Strategies 21
Goal 2: Implementation of the Oakland Schools Diversification Plan will lead to greater and more balanced socioeconomic diversity in our PK-12 schools 21
Objective 2:1 - Implement Comprehensive Plan 21
Objective 2:2 - Increase Integration 22
Objective 2:3 - Decrease Segregation 22
(ii) Project implementation 22
Comprehensive community assessment and engagement (Year 1) 22
● Assess pilot project and examine school assignment system 24
● Survey 1,200 Parents and Caregivers 26
● Conduct Focus Groups, Interviews with Oakland Families and OUSD Staff 28
Develop Marketing Plan and Test Communication Strategies (Years 1 & 2) 30
Develop Oakland Schools Diversification Plan (Year 2) 32
Expand OUSD enrollment data management and analysis capacity (Year 2) 35

Document project and disseminate results (Year 2)..... 35
(iii) Capacity building and lasting results.....37
(iv) Alignment with extent research and effective practice.....38
(v) Sustainability plan and stakeholder support.....40
(c) Project services.....42
(i) Strategies to ensure equal access and treatment..... 42
(ii) Likely impact of project services on intended recipients.....45
(iii) Focus on those with the greatest needs..... 47
(d) Project personnel.....48
(i) Prioritizing employment from persons from underrepresented groups.....48
(ii) Project personnel.....49
(e) Adequacy of resources.....52
(i) Project partner commitments.....52
(ii) Reasonableness of project costs.....53
(f) Project management plan..... 55
(i) Project work plan and timeline.....56
(ii) Procedures for feedback and continuous improvement..... 60
(iii) Contributions to the project from diverse perspectives..... 61
(g) Project evaluation..... 63
(i) Evaluation methods..... 63
(ii) Use of objective performance measures, quantitative and qualitative data.....68

(a) Need for project

(i) Problem to be addressed by the proposed project.

Oakland Unified School District (OUSD) serves the city of Oakland (population 430,553), one of the three largest cities in the San Francisco Bay, the most expensive metro area in the country.[1] Connected by a giant estuary of tidal water and

[1] PropertyShark's annual analysis of the most expensive U.S. zip codes based on median house sale prices.

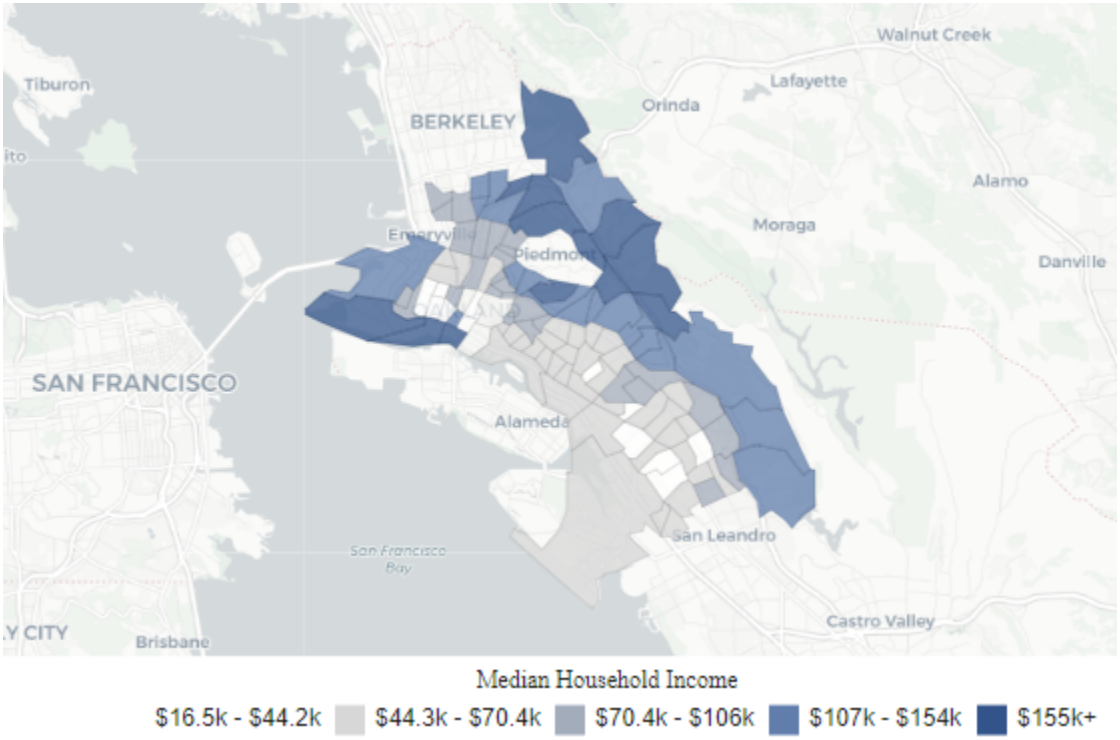
www.propertyshark.com/Real-Estate-Reports/most-expensive-zip-codes-in-the-us/

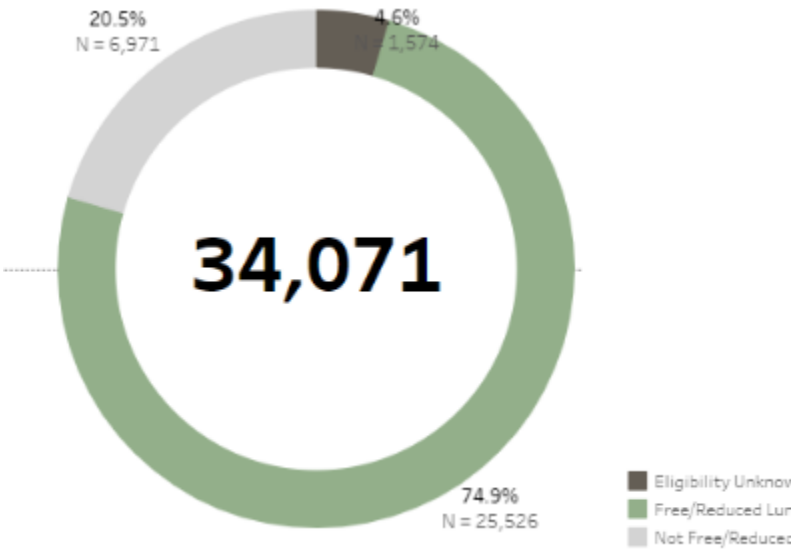
characterized by extreme income disparities, Oakland, like our sister big Bay cities—San Francisco and San Jose—is home to a real estate market that routinely sees small “starter” homes selling for several million dollars even as 15% of the city’s population lives below the federal poverty line, according to the American Community Survey. And disparity is growing as home prices soar, neighborhoods gentrify, and those on the margins are pushed to the streets. Homelessness in Oakland has doubled in the last 10 years, with more than 5,000 city residents now living beneath freeway underpasses, amid clustered encampments, and in other unsheltered situations. Geographically, Oakland is characterized by pronounced socioeconomic (as well as racial/ethnic) segregation between neighborhoods. In the Oakland “flats,” most residents are from working class BIPOC (Black, Indigenous, and people of color) families and in the Oakland hills and north Oakland, more are likely to be affluent and white. The map below (Figure 1) depicts the income segregation patterns in our city’s different sectors.

Figure 1. Household income by neighborhoods in Oakland

It is against this background of extreme haves and have-nots that the Oakland public schools operate. In the current school year, a full 74.9% of the 34,071 students we are serving in 85 district-run schools are eligible for Free/Reduced-Price Lunch (FRL), far exceeding the state average, 59.9% and making our district “high need” as defined in the notice for this demonstration grant.

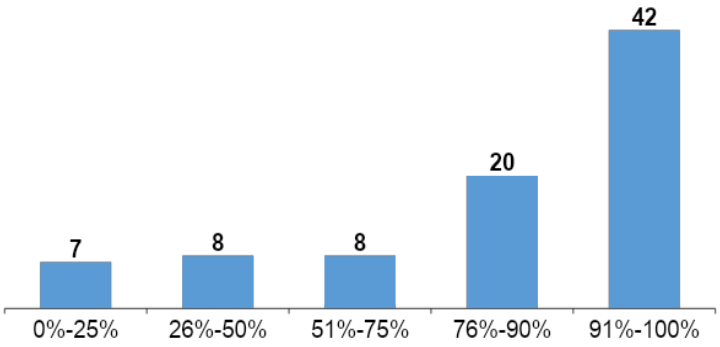
Figure 2. OUSD Students by FRL and non-FRL





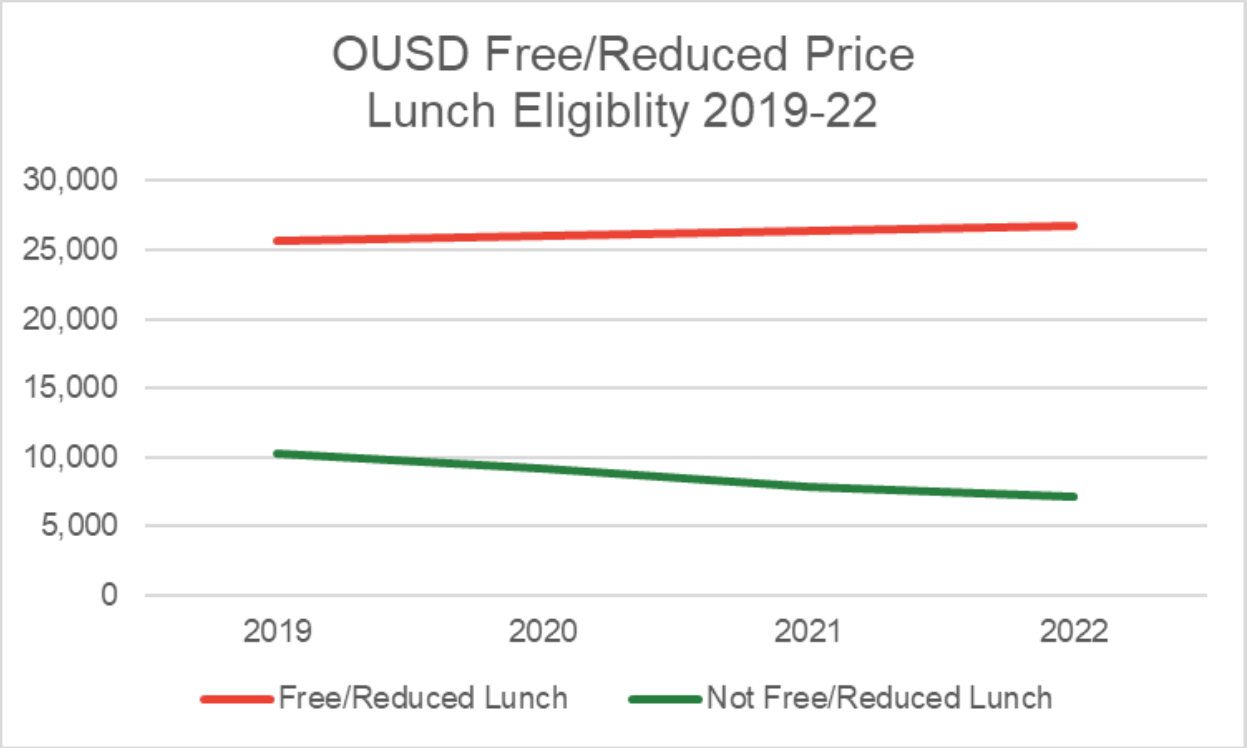
However, our individual schools vary greatly in the socioeconomic diversity of their students, with school site population FRL rates ranging from as low as 14.5% to as high as 99.5%. Figure 3 presents data on the disparities in school integration across OUSD. The schools where higher proportions of students are FRL-eligible are generally located in the lower-income Oakland flats, while most of our schools with the fewest FRL-eligible students are located in the Oakland hills and north Oakland, the city's higher-income neighborhoods, as shown in Figure 1.

Figure 3. Number of OUSD Schools by Percentage FRL



In addition to the disparities in the socioeconomic diversity of students from school to school, OUSD faces longstanding and growing challenges attracting students from middle class or more affluent families. From 2019-20 to 2022-23, a time when the number of FRL-eligible students district-wide increased by 4.5%, from 25,706 to 26,785, the number of non-FRL students dropped by 30%, from 10,219 to 7,103 (Figure 4).

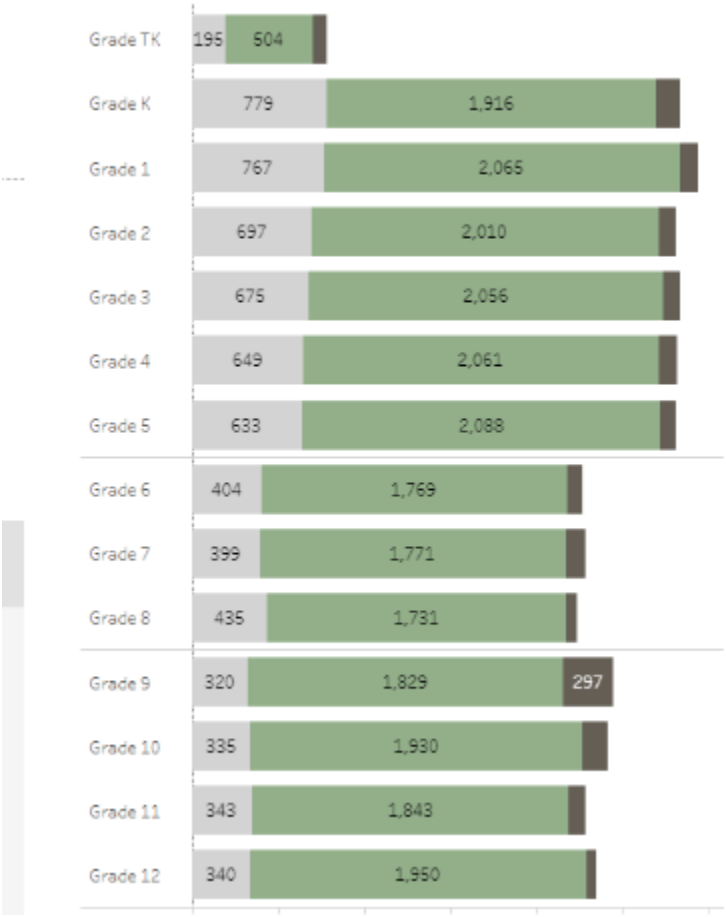
Figure 4. Number of FRL and non-FRL OUSD students over time



Moreover, many non-FRL students leave the district over time. When we look at enrollment throughout the grade levels, we see progressively fewer non-FRL students in OUSD—culminating with there being half as many in Grade 12 as in Kindergarten (Figure 5). In other words, we are gradually serving fewer and fewer non-FRL students

overall, and as students progress through the grade levels, their peers include fewer FRL students than in the prior year.

Figure 5. Number of FRL/non-FRL Students by Grade Level



Increasingly in recent years, non-FRL families in Oakland have opted to send their kindergartners to private schools, charter schools, and schools in neighboring districts instead of OUSD, or to move their children out of district schools at some point in their K-12 years, often after elementary school. This trend plays out in other American cities

with shifting populations undergoing urban upscaling: “Generally, in gentrifying communities, schools with fewer resources, bad reputations and low-test scores are long occupied by poor children of color, so that middle-class newcomers do not consider them viable schooling options for their children,” notes Gary Orfield,[2] a leading school desegregation researcher. “Instead, they search for schools of choice or private options, or they move to another area when their children reach school age.” During the 2022-23 school year, OUSD processed 1,250 inter-district transfer requests from Oakland families, and approved more than 800 of them—both the highest numbers in the district’s history. With grant funding, we will analyze this behavior specifically in the context of Oakland to identify the decision-making that drives it and strategies to counter it. In its recommendations for reducing segregation, the Urban Institute advises: “School leaders should note the key barriers preventing parents from buying into integration and address them.”[3] We propose to use grant funding to clearly identify those barriers so we can address them.

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[2] Mordechay, K., & Ayscue, J. (2019). School Integration in Gentrifying Neighborhoods: Evidence from New York City. *UCLA Civil Rights Project*, March 11(2019). Retrieved from https://escholarship.org/uc/item/5c63w88j

[3] Monarrez, Tomas. Urban Institute, Structural Racism Explainer Collection, *Policies Available to School Districts to Dismantle Racial Segregation in Public Schools*.

(ii) Gaps or weaknesses in services, infrastructure, or opportunities and how the project will address them.

While the level of segregation in Oakland schools is alarming, we also note several assets we have as a district—strengths we can draw on to make solutions more effective, easier to implement, and more readily adopted. Among these assets, we count; 1) an existing system of controlled choice, 2) a pilot program to learn from, 3) a demonstrated willingness by families to attend schools outside their neighborhoods, 4) a highly diverse population *within* our attendance zone, 5) citywide universal college scholarships for all students at OUSD schools, and 6) community support.

(a) Enrollment Policy

OUSD has an open enrollment policy[4] that centers school choice for all families. Intended to "meet the diverse needs and interests of District students and parents, while also maximizing the efficient use of facilities," the 17-year-old School Board policy essentially guarantees students can attend their assigned "neighborhood" elementary, middle, and high school, while also allowing all Oakland families to apply to attend any District school, regardless of where they live. Each year, families with students entering Kindergarten, middle school, or high school must rank their preferences during the open enrollment period (which occurs during the fall semester of the preceding school year). Currently, about 40% of students attend schools other than the neighborhood school to which they would have attended if it was their first-place pick.

[4] OUSD Board Policy 5116.1, Open Enrollment

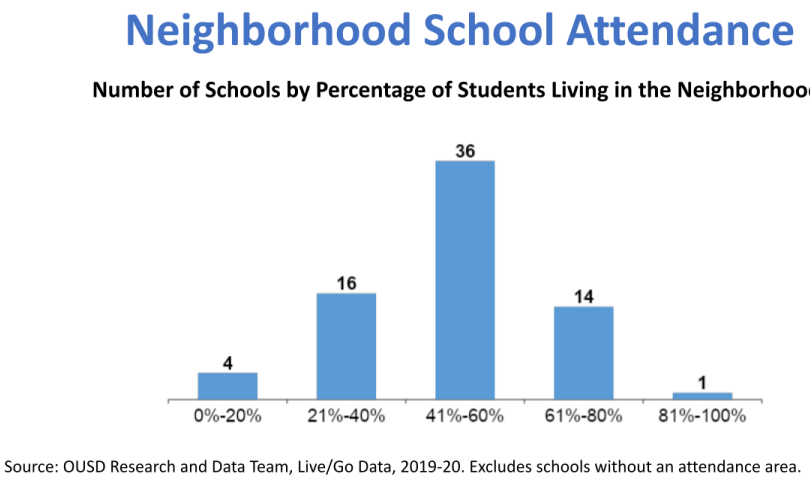
Allowing choice in Oakland is intended to meet diverse needs, but it is not producing the diversity and integration we are committed to achieving. With this planning grant, one goal will be to **learn how best we can add constraints or make other changes to our existing system to achieve greater desegregation**. The fact that we already have a controlled choice system in place, one that is well accepted by the community, is a strength we can leverage; it is a tool we hope to hone to increase diversification in our sites and classrooms and this planning grant will enable us to learn how best to do so. Dr. Zeyu Zheng, a professor of Industrial Engineering and Operations Research in the College of Engineering at the University of California, Berkeley, will lead that effort.

(b) Pilot Project

We have recently experimented with tweaking our school choice system to drive desegregation, and the early results are compelling, though limited. In fall 2020, the OUSD School Board closely reviewed 2018-19 school enrollment data to better understand the placement choices being made by families and the effects those selections have on the composition of sites. The Board analyzed whether schools reflected citywide demographics, the presence of racial isolation, the distribution of students qualifying for free or reduced-price lunch (FRL), the percentages of English Language Learners (ELL), and whether students attend their neighborhood schools. The data revealed that OUSD schools are not melting pots—they do not reflect the overall diversity of the city itself, or even the school district, which was 42% Latino, 24%

African American, 15% Asian, 12% White, and 7% other that year. No individual Oakland school was within five percentage points of those district OUSD averages for Asian, Black, or Latinx percentages. In fact, of our 85 schools, only five had BIPOC populations within 10 percentage points of those district averages. Instead, we see significant clustering by socioeconomic status, and other intersectional traits—chiefly race—associated with inequity. We also learned that about half of OUSD students attend their neighborhood school, but the percentage varies considerably, depending on the specific school. (See Figure 6.)

Figure 6. Neighborhood Attendance Rates



Source: OUSD Research and Data Team, Live/Go Data, 2019-20. Excludes schools without an attendance area.

We are well aware that a handful of schools are in high demand and annually see requests that outnumber seat capacity by several hundred, with waitlists equally long. These high-request schools are located in the more expensive hills and the northern portion of our district (areas that border Berkeley and are home to many

professors and other university staff members as well as highly paid Silicon Valley tech workers and other professionals) and include six schools with FRPM rates below 20% and five schools below 40%. (See map below.)

Figure 7. Students Eligible for Free and Reduced Lunch 2018-19

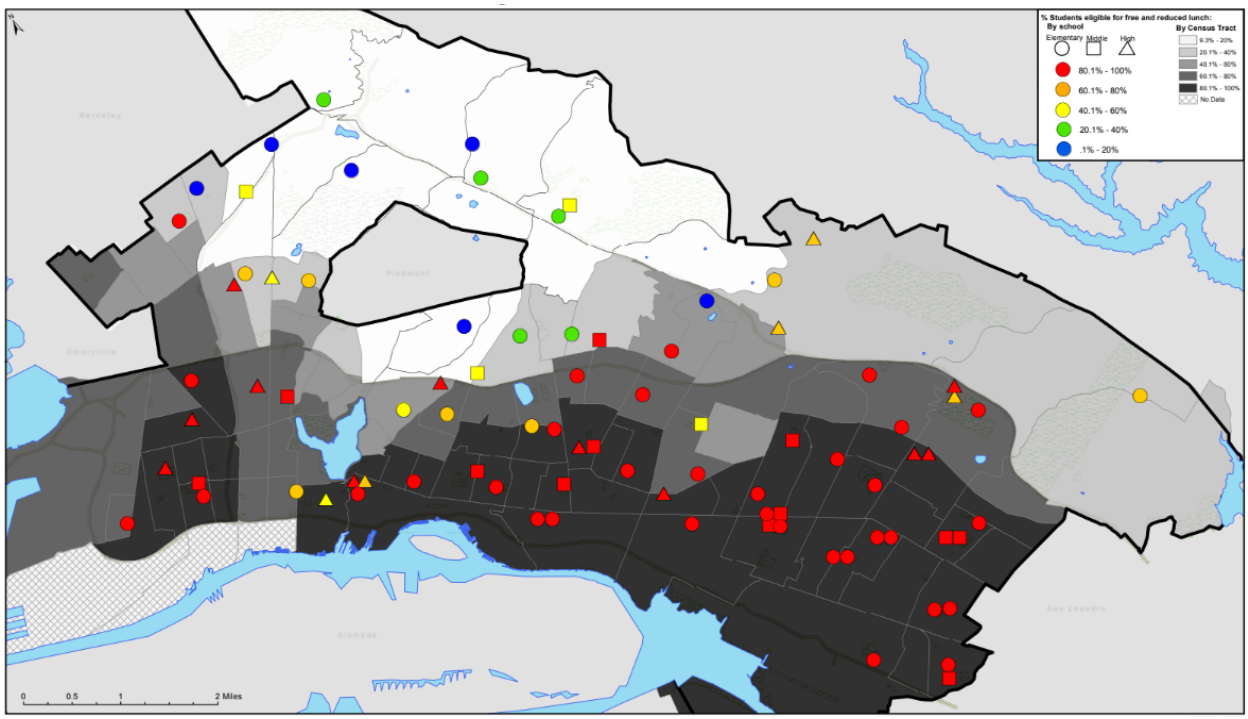
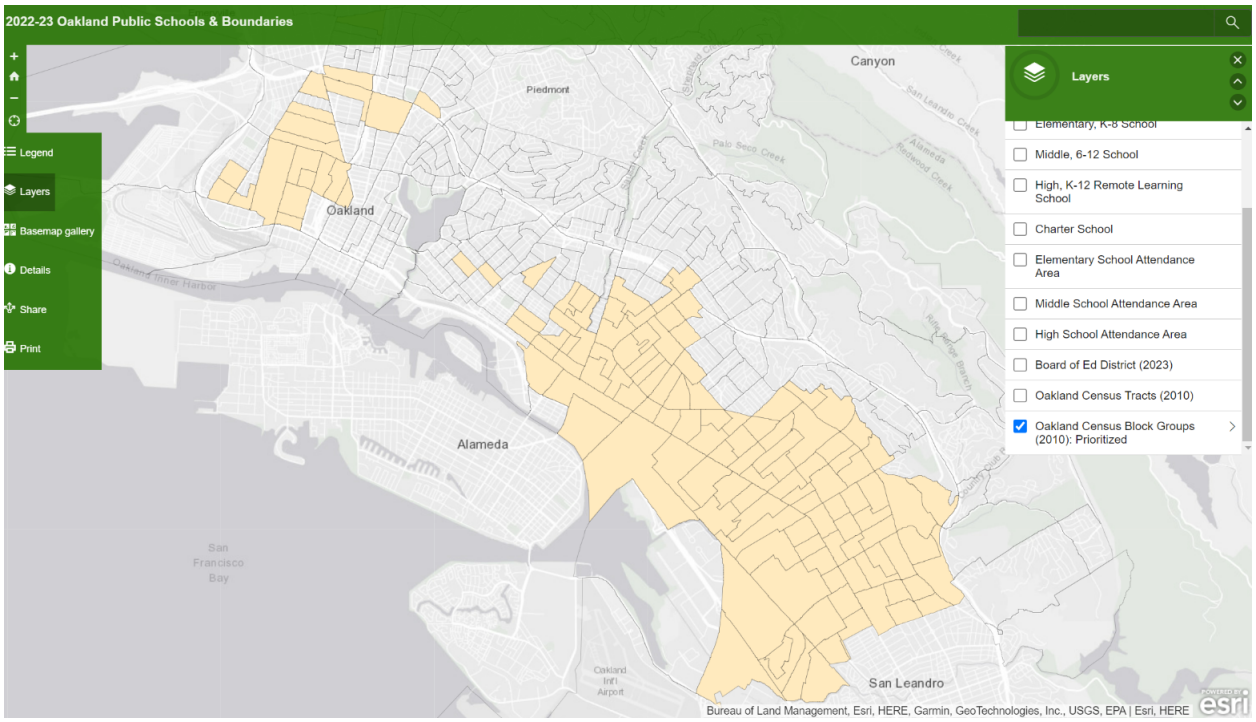


Figure 8. High-Poverty Census Tracts in Oakland, CA



Concluding that Oakland schools were too segregated, The Board launched a three-year pilot project designed to encourage students living in 50+ high-poverty Census tracts in East and West Oakland (which include 30 federally-identified Opportunity Zones) to attend three high-demand schools characterized by low percentages of SED students. Residential addresses in those tracts became a priority factor in our school assignment algorithm for 2021-22 and 2022-23 at Chabot Elementary, Sequoia Elementary, and Edna Brewer Middle School. In those years, the percentage of students from prioritized groups has risen consistently at all three schools

in Kindergarten for the elementaries and Grade 6 for Edna Brewer, the entry years.[5] At Chabot, the percentage of students from prioritized Census blocks nearly doubled, from 5% in 2020-21 (the base year) to 9% in 2022-23. At Sequoia, the percentage rose from zero to 26%—an indication of how powerful a tool prioritization can be. In 2020-21, none of the school's 50 kindergartners came from the to-be targeted Census tracts; the next year, with the pilot program in effect, more than one-fourth of the total Kindergarten population were children from the priority zip codes. That percentage remained equally high in the following year. At Brewer, the middle school in the pilot, the percentage rose from 14% of sixth graders before we applied the priority (in 2020-21) to 31% of the 72 sixth graders. With grant funding, we will analyze data from the pilot much more closely with an eye on how we should expand the approach to increase diversification at more schools.

(c) Willingness to attend non-neighborhood schools

More than half of OUSD students attend schools other than the neighborhood ones to which they have guaranteed entry if they request on time (see Figure 6) and 75% include schools outside their neighborhood as choices when enrolling. This trend is almost entirely due to choices made by families (with rare exceptions, all families are

[5] Sequoia Elementary also has a TK program and while the priorities also applied to TK, there are many additional assignment factors in effect for TK admission, so the data is not comparable. Even so, the district saw a gain from 4% in 2020-21 to 16% in 2021-22. In 2022-23, enrollment from the prioritized tracts held steady at 16%.

able to attend their local schools if they request them during the open enrollment period). **We see this trend as an opportunity—a willingness we can build upon to increase school integration**. As previously stated, neighborhoods in Oakland are extremely segregated (Figures 1 and 7), as is common nationwide. And this disparity—by income as well as race and other intersectional factors—is recognized by researchers as a primary reason schools today are more segregated than they were nearly 70 years ago when the Supreme Court was impelled to rule that separate is not equal in the 1954 landmark case, *Brown v. Board of Education*, which disallowed intentionally segregated schools.[6] For the first three decades afterward, the country saw less segregation, particularly for Blacks in the South. But resegregation has occurred in the last 40 years largely because of the way people live—in segregated communities that house schools characterized by the same lack of diversity as the communities where they are located.

To reduce segregation in Oakland public schools, we need more inter-neighborhood movement. We need to draw children and youth living in the “flats,” where poverty is concentrated, to schools in the hills and the north, and vice-versa. The fact that so many of our families already travel outside their neighborhoods for school may help us promote movement—”sell” the idea—and further dissolve the conventional presumption that a “neighborhood school” is the ideal.

[6] Potter, Halley. (May 17, 2022) *School Segregation in U.S. Metro Areas*. The Century Institute.

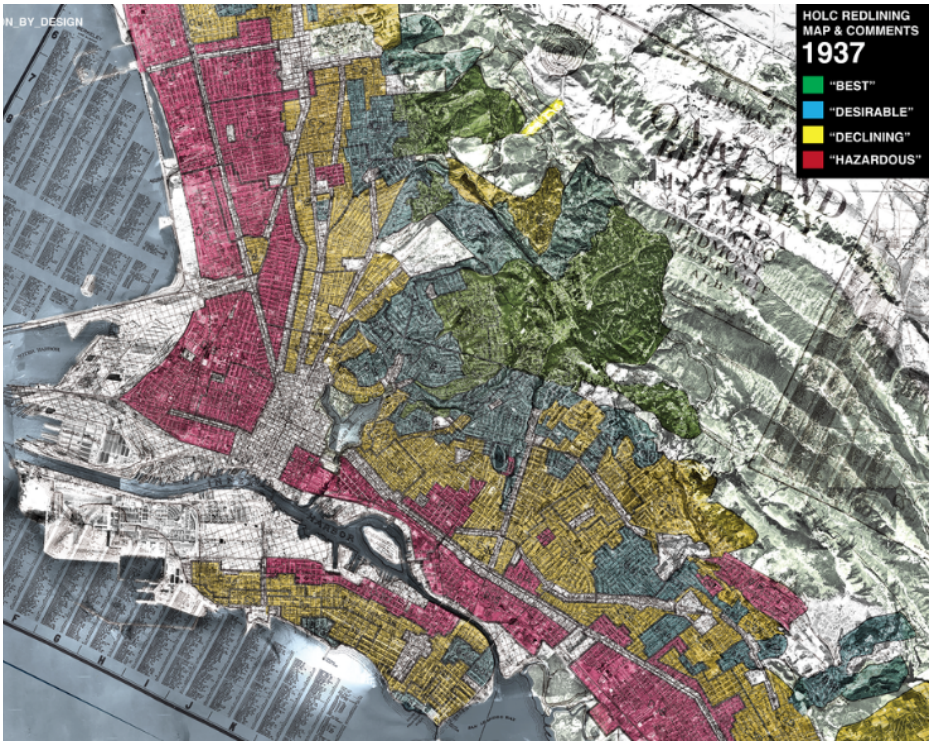
(d) Diversity *within* our district

OUSD does not need to join with neighboring districts to "find" the diversity we want to see in our schools; we have it within our existing service area. Unlike some highly segregated cities around the country that must take a regional approach to make it possible for students to learn in environments where the life experiences and backgrounds of their peers range widely, we already have an extremely diverse pool of students. We do not need to convince people in one city (e.g. be it urban and poor, or wealthy and white) to cross municipal borders to attend schools in a nearby suburb, or vice-versa, as has been done elsewhere in the country (such as Jefferson County, KY).

We expect Oakland's existing socioeconomic diversity will be a big plus when designing a comprehensive plan to desegregate our schools. From an administrative perspective, we only need to coordinate and build support for change within one district, one set of boundary zones, one system of school assignment. There is also an existing sense of oneness in "The Town," as Oakland is fondly called by its residents, we can build upon to make school integration a community-held goal, which will be essential for any desegregation plan to be successful. But we are not naive. We do recognize that the extreme income gulf between the flats and hills can be as big a barrier as an actual city boundary. These divisions are long-standing—the map in Figure 1 depicting home price disparities in Oakland today looks hauntingly like the 1937 redlining map for our area, which identified which areas would be eligible for generously-subsidized,

government-backed home loans and effectively prevented people of color (who primarily lived in the red-marked areas) from getting them. (See Figure 7.)

Figure 7: Map Recommending Best and Worst Neighborhoods for Home Loans



1937 Home Owners Loan Corporation map of Oakland. Source: Segregation By Design

Division and racial isolation was the goal of redlining and, indeed, the intention behind the growth of many American suburbs. Brown v. Board propelled white flight from city centers leading to the creation of suburbs, where people tend to live amid only people of a similar class. Harvard University's Project on Desegregation sounded an alarm already in 1997 that segregation in schools was rising and access to equal

educational opportunity was decreasing because of both anti-integration court rulings and policy decisions as well as suburban homogeneity.[7] In 1999, they reported a worsening situation. We recognize, as San Francisco Unified School District noted when embarking on a desegregation plan, "it took decades of policy and practice to create our segregated neighborhoods and schools, and it stands to reason that it will take hard work to reverse this terrible legacy."[8] **Our goal is to create the systemic change in our enrollment practices needed to create schools that mirror the socioeconomic diversity of our city so we deliver a comprehensive and rigorous education for every student**.

(e) Geography

With grant funding, we will analyze the effects of our current school boundary lines and whether we might redraw them to increase integration. The Urban Institute notes that "small, equity-minded changes to racial borders in school boundaries can have massive impacts on school integration without increasing commuting burdens and

[7] Orfield, G., Bachmeier, M. D, James, D. R, & Eitle, T. (1997). Deepening Segregation in American Public Schools: A Special Report from the Harvard Project on School Desegregation. *UCLA: The Civil Rights Project / Proyecto Derechos Civiles*. Retrieved from https://escholarship.org/uc/item/22z7v7ms

[8] OConnel, Henry. (Oct. 6, 2020). Lessons on Integration Around the Country, Medium. https://medium.com/@oconnellh/lessons-on-integration-from-around-the-country-82827b599ad8

without overhauling the entire school assignment system." We are concerned that the geography of Oakland, with its relatively remote and sparsely populated hill areas and long distances between neighborhoods of concentrated poverty and those with wealth, will make it difficult to draw boundaries that, alone, would increase integration adequately and still be practical. But we are also mindful that this approach has been effective for some 50 years in Berkeley, our next-door neighbor, and elsewhere in the nation, and will explore this avenue as we develop a comprehensive plan to increase socioeconomic diversity.

(f) Community-supported college access for all OUSD students

In 2018, 62% of Oakland residents passed Measure AA—the Oakland Children's Initiative—to ensure early investment in the city's youngest residents and support them through college graduation by dramatically expanding access to high quality preschool and providing college access, mentorship, and scholarship support for students to obtain two- and four-year college or technical degrees. The community-supported 30-year parcel tax is evidence of widespread support for children and education that exists in Oakland—a sentiment we will build upon as we work collaboratively with the community to design a plan that is widely embraced.

One prong of the multi-faceted Children's Initiative is the Oakland Promise Fund, which provides money for college to all students in OUSD schools in six installments at key transition years (e.g., entry to kindergarten, 5th grade completion, etc.), and also many additional supports to low-income families starting at birth. Universal Children's

Savings Account programs like Oakland's Promise Fund have been shown to have an outsized effect by not only making college more affordable by providing cash, but also by fostering college-bound identities in families starting at birth. The goal of Oakland's comprehensive program, which also includes early childhood education funding, is to significantly increase the number of Oakland public high school graduates who go on to graduate from college by making it a goal for all families by increasing access and opportunity through strategies that include free financial coaching. We expect that such a college-going mindset is also what higher income families want and expect in the schools where they send their children. The savings program is still rolling out and will likely be one of the strengths we highlight when we design a desegregation plan that includes drawing higher income families to more of our schools.

(b) Project design

(i) Project goals, objectives, and outcomes

The following goals, process and outcome objectives, and measurement indicators for the proposed **Oakland Schools Diversification Project** are closely aligned with the intended outcomes of the Fostering Diverse Schools Demonstration program and Performance Measures for programs under Absolute Priority 1 of this grant competition.

Goal 1: OUSD will develop a comprehensive plan for increasing socioeconomic diversity in our schools

Objective 1:1 - Engage Community

OUSD will engage a diversity of voices of students, families, educators, community partners, and experts in the field as information sources to understand all factors that contribute to existing socioeconomic disparities (SED) and inequities in access to educational opportunities in our schools. (Indicator: Documentation of community engagement strategies, including surveys, focus groups, interviews, and town halls, and demographic details about who participated)

Objective 1:2 - Socioeconomic Segregation Report

OUSD will complete a comprehensive **Socioeconomic Segregation Report** documenting disparities in SED and equitable access to educational opportunities across our schools along with the contributing factors by the end of Year 1 of the grant period. (Indicator: Completed Socioeconomic Segregation Report published on the OUSD website and shared with our Board of Education)

Objective 1:3 - Comprehensive Plan

OUSD will develop a comprehensive plan to increase socioeconomic diversity and promote student academic achievement by the end of the two-year grant period. (Indicator: Oakland Schools Diversification Plan published on district website and shared with the Department of Education and other LEAs)

Objective 1:4 - Data Analysis

OUSD will enhance and refine our existing enrollment data collection and analysis tools to better track patterns, understand family decision making, and assess the impact of changes we make to our school assignment algorithm against the goal of significantly increasing socioeconomic diversity at schools throughout our district and within individual schools. (Indicator: Data dashboards)

Objective 1:5 - Marketing Strategies

OUSD will test the efficacy of enrollment marketing strategies to be included in the new Oakland Schools Diversification Plan before the end of the grant period and revise approaches based on results. (Indicators: Artifacts from digital, social media, posters, billboards, lawn signs, and other marketing vehicles.)

Goal 2: Implementation of the Oakland Schools Diversification Plan will lead to greater and more balanced socioeconomic diversity in our PK-12 schools.

Objective 2:1 - Implement Comprehensive Plan

OUSD will implement the Oakland Schools Diversification Plan within 24 months of the end of the two-year grant period. (Indicators: Documentation of strategies put in action—e.g., new school boundaries map, new enrollment algorithm, new programs at high-FRL schools)

Objective 2:2 - Increase Integration

By the third year after the grant period, the number of schools within +/-10 percentage points of OUSD's average FRL percentage will increase by at least 50%

compared to the baseline at the end of the grant period. (Indicator: OUSD school enrollment records)

Objective 2:3 - Decrease Segregation

By the third year after the grant period, there will be a substantial narrowing in the enrollment disparities between high FRL vs. low FRL schools compared to the baseline. (Indicator: OUSD school enrollment records)

(ii) Project implementation

The key deliverable of the Oakland Schools Diversification Project will be a comprehensive Oakland Schools Diversification Plan to substantially increase the socioeconomic diversity in our high-need, PK-12 district starting in 2025 and continuing for decades to come. In particular, the Diversification Plan will be designed to ensure that low-income students gain access to a well-rounded education and activities that support their academic and overall well being. Below is a description of the activity phases that will help us reach this goal. (For a step-by-step timeline of the project's implementation, please see section f. Project Management Plan.)

Comprehensive community assessment and engagement (Year 1)

To develop our Oakland Schools Diversification Plan, we need to fully understand: (1) Factors OUSD families consider when making school choices, and (2) Why families of non-FRL students opt for non-OUSD schools. The information will guide new strategies to increase the movement of FRL-qualifying students to schools without concentrated poverty and to attract more families to enroll in the district. This second

goal is important not only because we—like other California districts—are facing a general trend of declining enrollment[9] but also because 75% of our student body today qualifies for FRL. Without increasing the percentage of more affluent families in our district, it will be hard to avoid having high-FRL, income-segregated schools.

To change existing patterns, we will conduct extensive quantitative analysis of our enrollment data and qualitative research in the community to understand the factors that families who enroll their children in OUSD consider when making school choice decisions, including the perceptions and knowledge that drives those decisions. We expect to illuminate factors we aren't yet considering that are promoting socioeconomic segregation in our schools. This information-gathering phase will also be the start of a public awareness campaign to draw more residents to not only attend our schools, but also rally around a citywide, inclusive effort to desegregate and improve outcomes for all.

This community engagement phase will include four distinct areas of work: (1) Evaluating our pilot data and controlled choice assignment system, (2) Engaging additional school site communities in our district as potential candidates for expanding

[9] Lafortune, J., and Prunty, E. (May 4, 2023) Public School Enrollment Declines Vary across Grade Levels. Public Policy Institute of California. www.ppic.org/blog/public-school-enrollment-declines-vary-across-grade-levels/#:~:text=The%20demographic%20research%20unit%20at,than%20the%20actual%200.7%25%20decline.

the pilot approach, (3) Surveying broad swaths of Oakland parents and other caregivers with school-age children, and (4) Conducting focus groups and interviews with Oakland parents and caregivers.

- **Assess pilot project and examine school assignment system**

A critical part of this work will be a **thorough assessment of our aforementioned 2020-2023 pilot project** aimed at increasing the socioeconomic diversity of three schools with historically low SED relative to overall district enrollment patterns. This evaluation will involve two distinct aspects—quantitative and qualitative. It is important to understand the potential impact on overall school enrollment patterns in OUSD of creating a pathway for families in other low-income census blocks to enroll in higher-income schools.

Quantitative Data Analysis: A system like ours, which uses a choice and lottery mechanism to prioritize school diversity, is considered one of the key tools in a district's arsenal to increase equity and reduce segregation in schools.[10] Our system provides constrained choice to parents while we retain guardrails, such as priorities for siblings of students attending a school or the children of school staff members. The open enrollment process is already in place and accepted by the community. We will take a systemic, evidence-based approach to improving outcomes by partnering with U.C.

[10] Monarrez, Tomas. Urban Institute, Structural Racism Explainer Collection, *Policies Available to School Districts to Dismantle Racial Segregation in Public Schools*.

Berkeley to study how we can leverage that acceptance and increase integration by intentionally altering the matching algorithm we use. Doctor Zeyu Zheng in the College of Engineering anticipates assembling a small team of researchers jointly with OUSD to do this work, which will be shared widely through both academic and public channels, to support other LEAs working to increase socioeconomic diversity in their schools and classrooms. The team will investigate the potential of developing specialized data analytics tools and identifying changes to the school assignment system that will increase access and equity to help ensure students from low-income families experience high quality and inclusive learning environments.

With the pilot, we preferenced students from low-income Census tracts who requested to attend particular high performance schools with low SED rates—below 20%. The target schools have long waitlists in large part because they are popular with white, affluent families and volunteered to participate in the project. During the two pilot years, we saw significant upticks in FRL enrollment at the target schools. But a thorough data analysis and simulations will enable us to determine how best to continue, expand, and/or modify the program to achieve greater change and equity in OUSD. Modeling will be used to assess the potential impact of expanding the pilot to schools with FRM-eligible rates under 40%, for example.

Qualitative Feedback: The quantitative pilot analysis will also inform qualitative questions we will ask families, teachers, and school leaders through surveys, town halls, and interviews to learn about the experiences of families at the schools where the

pilot was in place. We need to know how participating schools and students are faring so we can move beyond one-way integration pilots and into effective, long-term two-way integration strategies and systems change. This effort will be led by our project's Community Outreach Manager in collaboration with CBOs who have earned trust in their communities. We are mindful of the complexity involved in school choices and of research that reveals unmitigated school choice policies have been found to increase segregation because parents of different races place different values on school attributes related to reducing social status inequality—particularly school performance.[11]

While we anticipate continuing to preference students living in low-income Census tracts at schools located in high-income areas, we need to better understand the decision-making that drove the enrollment shifts before we can effectively scale and incorporate the approach into a comprehensive, data-driven Oakland Schools Diversification Plan. We will also need to encourage more low-SED schools to opt in and hope to learn about the benefits experienced by the communities at the pilot schools so we can share that feedback district wide and encourage integration. The information we gain from families at the schools where the pilot program has been in place will help us effectively expand the program by informing that outreach as well as the work of the data team looking at how best to modify our school assignment system.

[11] Ukanwa, K., Jones, A. C., Turner, B. L. (2022). School Choice Increases Racial Segregation Even When Parents Do Not Care About Race. Proc. Natl. Acad. Sci. U.S.A., 35(119). https://doi.org/10.1073/pnas.2117979119

- **Survey 1,200 Parents and Caregivers**

This grant would enable us to do research among both Oakland families with students enrolled in our schools and Oakland residents who opt out of district schools with the goal of identifying what changes are needed to decrease segregation, reduce disparities, and close achievement gaps—key steps to achieving our district goal of eradicating inequities at all our schools.[12]

An important focus of our needs assessment and community engagement work will be a broad, **citywide study to deepen our knowledge regarding factors that shape Oakland families' school choices**. FM3 Research, a public interest polling group, will conduct this outreach to learn about public perceptions and awareness related to OUSD, private, and charter schools; Oakland schools in general and individually; and particular academic programs. This research will focus on Oakland parents with children 0-4 years of age, children in 3rd and 4th grade, and children in 6th and 7th grade who attend OUSD schools, private schools, charter schools, and public schools in other districts, with a goal of reaching at least 400 parents from each of these groups. The grade bands were selected because they all precede key decision-making years—when families transition from elementary to middle school and from middle school to high school—so that we can still influence their choices. The project team, together with the Advisory Group and FM3, will develop the final survey questions. We want to ask Oaklanders: What is your perception of Oakland schools? How did you form that

[12] Oakland Unified School District, Board Policy 5032, Equity Policy

perception? What factors are important when considering a school? What is your perception of how physically safe, emotionally safe, academically successful, rich in services and extracurricular activities OUSD schools are?

FM3 will collaborate with our project team and OUSD's Translation Services Office to recruit respondents, translate the surveys, and conduct focus groups and interviews. To reach parents whose children attend private schools, charter schools, schools in other districts, and those who are not in school yet, FM3 will utilize commercial lists, opt-in survey panels, voter lists, and other sources. The district will share contact information for OUSD parents with FM3. We anticipate doing this outreach in as many as nine languages—English, Spanish, Cantonese, Arabic, Farsi, Tongan, Hmong, Khmer, and Mam. FM3's methodology is designed to be as inclusive as possible by using multiple modes, including phone calls, email, and text messaging to reach people, and both phone and online options for completing the surveys. FM3 will monitor responses from each of the three groups of parents, the demographic profile of respondents, and their school choices, keep our project team informed, and to ensure we are reaching the target audiences. At completion, FM3 will provide OUSD a summary of the survey results, crosstabs, and a complete written analysis of the results, and make a presentation of the survey results to the project team, project Advisory Council, and Board of Education.

- **Conduct Focus Groups, Interviews with Oakland Families and OUSD Staff**

To ask deeper questions and develop a more nuanced understanding of school enrollment decision-making in Oakland, we will also conduct more focused community engagement work. This effort will utilize a mix of town hall listening events, focus groups, and interviews to gather information about issues such as what parents and caregivers are looking for in schools for their children, problems they perceive that influence them to lean away from choosing OUSD schools or to transfer their children from OUSD to other options at some point in their education, and perceived advantages of particular private or charter schools. This inquiry will probe more deeply into the responses from the citywide surveys, to learn why people might not think Oakland schools are a safe choice, for example. Are parents concerned about the physical safety of their children traveling to and from school, or when they are at school, or about academic “safety” (will they get a rigorous education so they will have the option of attending rigorous college)? And what would change their minds—for example, would publicizing success stories about OUSD students be effective?

The research team at 510media will partner with us to conduct this work. As a Black-owned, Oakland-based agency that aims to connect organizations to the people they serve, 510media is well positioned to do this deep discovery work, which will drill deeper into the perceptions and motivations of Oakland families than our broad surveying will capture. We want to answer the question: “What needs to be true for a family to choose OUSD?” 510media consultants will talk with the OUSD enrollment

team and school staff members, conduct town hall listening sessions with 50-75 community residents, recruit participants for listening workshops, and develop questions to ask in those sessions. OUSD's Translation Unit will assist 510media to prepare outreach materials and provide interpretation services for town halls and workshops in languages other than English as necessary.

OUSD's Office of Equity and Student, Family, & Community Engagement team will bring organizations that have strong connections to particular neighborhoods and school communities into this work. Oakland Natives Give Back, Equity Allies, Get Schooled, Oakland Reach, and other local CBOs will partner by helping us design the town hall content, develop interview protocols, and advertise town halls utilizing flyers, email, social media channels, and other communication methods so that they are accessible to community members from multiple cultural/linguistic backgrounds.

510media will facilitate the focus groups, conduct interviews, and administer any surveys or other tools they develop to complete this phase. Results from FM3's surveying will inform this holistic process, which will be led by the project team. We recognize that school choice, enrollment, inequity, and income are very sensitive topics and believe that enlisting third parties outside of OUSD to facilitate this work will help ensure we are able to engage school stakeholders in honest, deep conversations that surface concerns.

To aid recruitment, and to acknowledge the extraordinary value community members will bring to this process and our knowledge, we will provide gift cards as

stipends to workshop participants as a show of gratitude and to recognize the value of their time. At completion, 510media will provide OUSD with a comprehensive set of findings from the focal groups and a marketing/media strategy guide to promote OUSD schools to non-FRL communities. They will also present these materials and their findings to the project team, project Advisory Council, and School Board.

Develop Marketing Plan and Test Communication Strategies (Years 1 & 2)

The information we garner from surveying, interviews, focus groups and data analysis will inform a twin initiative to reduce segregation by *drawing* more middle class and affluent families to more of our schools. We already offer specialized programs in certain locations, such as dual-language programs and career academies, which act as pull factors, potentially increasing the movement of students away from the segregation that typifies their neighborhoods. But our assumption now, which seems supported by enrollment data, is that some parents have a shortlist of district schools to which they want to send their children. And if they don't get into those select schools, then they will choose options outside the district. In other words, they are only "willing" to attend those schools that enjoy a strong reputation in the public sphere.

The comprehensive community engagement and research we will conduct in Year 1 will test the validity of this conventional wisdom and identify the facts and assumptions that fuel this thinking to determine how we can alter it and reduce the deleterious results. Certainly, school performance or test scores may play a role, but we believe the forces are more nuanced. More importantly, we believe that all of our schools can

provide safe spaces and quality learning opportunities for all the city's children, but we need to know how best to communicate that reality with the families who are opting out. Once we have that information, we will design and implement a plan that accounts for their decision-making process, but is aimed at changing the results—to yield different choices.

Our partnership with 510media, behavior science specialists with deep roots in Oakland, will extend into Year 2 to develop, test, and refine a public facing communications strategy designed to attract more middle and high income families to our schools. The communications plan will highlight and leverage the district's many assets as part of a targeted effort to shape the perception of parents generally, and non-economically disadvantaged families in particular.

OUSD's project team, with assistance from OUSD's Communications & Public Affairs Department and Translation Unit, will design materials (such as lawn signs, posters, and social media releases as well as school specific recruiting toolkits) in collaboration with 510media staff, who will help guide the messaging and direction based on their learned understanding of community priorities around schools and choice. In Year 2, we will beta test these marketing and communications vehicles and refine the outreach plan, which will be included in our Oakland Schools Diversification Plan. We will design these test releases together with 510media to identify where we should engage to be most effective—traditional or digital media, radio or lawn signs, Rockridge or Glenview neighborhoods.

Develop Oakland Schools Diversification Plan (Year 2)

We will utilize findings from the above-detailed Socioeconomic Segregation Report, broad community engagement, and beta testing, as well as best practices in integrating schools across the country, to develop our Oakland Schools Diversification Plan. Its overall purpose will be to create schools throughout OUSD that mirror the socioeconomic diversity of our city so we deliver a comprehensive and rigorous education for every student. The Project Manager together with the Project Director will write the Plan, circulating it to the Advisory Group and School Board as it develops and for final approval. The Plan will guide systemic changes in our enrollment practices needed for us to steadily move toward this goal.

The Plan will include:

- A description of the need for this Plan
- A description of the process we used to develop the Plan
- Our vision for socioeconomically and racially/ethnically diverse schools
- A statement and accompanying data regarding the current patterns of segregation in school enrollment
- Key findings from the OUSD School Diversification Project and other LEAs' recent experiences with desegregating schools, including neighbor cities San Francisco, which launched a very public effort in 2020 to diversify its schools and has been implementing well considered changes to its enrollment model with support from researchers at Stanford University, and Berkeley, whose controlled choice model is

coupled with intentionally drawn attendance zones to ensure socioeconomic integration—a community-supported priority for more than 50 years.

- Goals and objectives for at least 10 years, including measures of success, timelines, strategies to sustain diversity, cost estimates, and progress metrics
- Professional development activities that will support the Plan and our overall goal of socioeconomically diverse and inclusive classrooms that support the academic, social, emotional, and mental health needs of all students—this may include training on the large body of research that shows students are better prepared for success when they learn together in diverse schools, strategies for creating an atmosphere of inclusion, and approaches to desegregation in other districts
- Data collection, analysis, and transparency strategies so that the community will help hold the district accountable for meeting diversity and equitable access goals
- Strategies to ensure continued community engagement, building on the process implemented to develop the Plan, including the role of the project's Advisory Group and project partners, as well as other relationships and structures, such as those that support our comprehensive community schools
- Comprehensive strategies we will implement at the district, school, and classroom levels to improve academic outcomes by increasing socioeconomic diversity, based on what we learn from our data analysis, community outreach and research, and investigation into effective practices in other school districts around the country. For example, the Plan is likely to include an expansion of our desegregation pilot project. It

may also recommend other changes to OUSD's current controlled choice system, ranking options, assignment process, school feeder patterns, neighborhood school boundaries, and/or special curricular options.

- Section on programs and initiatives that are already effectively appealing to non-FRL families.
- A school directory, map of schools, and school boundary maps
- School choice policies and procedures, including a clear and transparent description of the ranked priority system
- Policies and procedures regarding inter- and intra-district transfers
- A comprehensive marketing and communications strategy to promote more diverse schools by changing current enrollment behaviors—this plan will be informed by field testing in Year 2
- Strategies to publicize and disseminate our findings, process, proposed changes, lessons learned, and the Plan itself to various audiences including OUSD families, the wider community of Oakland, other districts, policymakers, and academics. We will utilize many methods, including in-person presentations, our website, social media, and approaches recommended by 510media as part of their role in this project.

Expand OUSD enrollment data management and analysis capacity (Year 2)

To accurately track outcomes, measure success, and make needed changes in our targeted enrollment strategies, we need to continually monitor patterns in the school choices of Oakland families. For this purpose, and to ensure sustainability, we will

improve our data collection and analysis capacity; create tools and write code to track key indicators of change, and develop a dashboard to make this data visual and available to stakeholders. This work will be led internally by Rohit Verma, OUSD's Coordinator of Enrollment Projections, with collaborative support from an engineering research team at U.C. Berkeley, a project partner. This project component will position us to be more data savvy and informed as we continually strategize to attract and retain children from Oakland (and outside) to OUSD while promoting diverse schools.

Document project and disseminate results (Year 2)

We plan to disseminate the Oakland Schools Diversification Plan we develop through this project widely—both to stakeholders in and around Oakland; to colleagues in the region with whom we are already in regular discussions from San Jose, San Francisco, and Berkeley school districts; and to other school districts nationwide. As noted, the Plan will include descriptions of the need this project responds to and the process used to develop the Plan—a summary of the project's implementation. To disseminate the Plan, we will publish it on our website, and produce a briefing or white paper on the project which we will publish on our website and seek to place in publications for educators. We will also seek to present the findings at appropriate regional and national conferences. We will welcome engaging with other LEAs directly to support them in implementing similar programs.

To assist us in documenting the project and disseminating its results, OUSD will engage an experienced external evaluator (HTA Consulting) to conduct a

comprehensive local project evaluation (please see g. Project evaluation, below). Our project team will share all relevant project data with the evaluator. In addition to assisting OUSD in collecting data for and providing required reports to the Department of Education, the evaluator will produce a report on the project's activities, participants, progress, impact, challenges encountered, and successes, after the first year of the project. That Year 1 evaluation report will also include recommendations for strengthening the program during Year 2. At the end of Year 2, the evaluator will produce a final project evaluation report documenting the project's implementation and outcomes. In addition, the evaluator will assist us in preparing the materials we will use to disseminate information about this project's implementation and results to other school districts.

(iii) Capacity building and lasting results

This planning project is intended and designed to build OUSD's immediate and long-term capacity to make our schools more socioeconomically diverse, reflective of the city's population. To support this overall goal, this project will deepen knowledge and understanding regarding the factors that contribute to the existing socioeconomic disparities among our schools. It will also expand knowledge among members of our project team and the Advisory Group around effective efforts to better integrate schools in other districts, regions, and states. Both of these outcomes will inform our work to design effective strategies to reduce isolation and integrate our socioeconomically

segregated schools. These strategies will be detailed in the primary deliverable of this two-year grant period: our comprehensive Oakland Schools Diversification Plan.

The comprehensive Plan, which will include a marketing and engagement strategy to help us communicate the benefits of integrated schools for all students and foster an "all in this together" approach, will guide our work to better integrate our schools over the next decade and beyond, and to monitor our progress. The professional development activities for educators prescribed by the plan—such as training on effective approaches to desegregation in other districts, and strategies for creating an atmosphere of inclusion in our schools—will help to build capacity in our schools to meet the holistic needs and promote the success of all students.

The collaborative nature of our project is another avenue through which we will build ongoing capacity to better integrate our schools. As we implement this planning and capacity building process, OUSD will work in partnership with Bridges Collaborative (a national school integration organization) as well as local, grassroots organizations including Oakland Natives Give Back, Equity Allies, Get Schooled, Oakland Reach, and others who are part of our community schools. Some of these community partners will help us engage a diversity of voices in our planning efforts – including families from historically underrepresented groups as well as those in our city's higher-income neighborhoods. Others will serve on our Advisory Group. We will leverage the expertise, relationships with school communities, and other resources our partners bring to this

project's implementation and planning. These partnerships will continue to be resources for our work to better integrate the Oakland schools in the years ahead.

A crucial additional outcome of this project will be to expand our capacity to continually monitor patterns in the school choices of Oakland families. We will do this by developing data management and analysis tools, including dashboards that can serve as tools to integrate data from multiple sources, monitor our progress, communicate trends and challenges to stakeholders, and help inform refinements in our efforts to promote more diverse schools in the coming years.

(iv) Alignment with extent research and effective practice

As part of our planning and capacity building process, our project team will study and discuss documentation of research and effective practices in efforts around the country to promote diverse schools. This subject will be the focus of the first of three Diversifying Our Schools day-long staff sessions that will occur during the project period and will be a standing agenda item in our weekly project team meetings as well as in our quarterly Advisory Council meetings. We expect to hire a training consultant to help provide this content, with support from Bridges Collaborative.

As noted, OUSD's own 2020-2023 pilot project to increase integration at three elementary schools and one middle school has proven effective in increasing the numbers of economically disadvantaged students attending low-FRL schools. The strategy we employed to achieve this was to give priority for enrollment in these schools to students living in high-poverty Census tracts who included those schools among their

choices. This approach leveraged our existing open enrollment/controlled school choice policy and a centralized lottery mechanism—considered one of the key tools in a school district's arsenal to increase equity and reduce segregation in schools.[13] Part of our work in engaging the community and developing our OUSD School Desegregation Plan will be to explore scaling this effective practice to other low-FRL schools so that we can improve outcomes for many more students. Additionally, we will work to identify strategies to promote two-way integration—moving higher income students into lower income neighborhoods because research shows all students benefit from attending integrated schools—there is no negative impact on higher income children.[14] [15] This exploration will include comprehensively evaluating our pilot project, engaging members of other OUSD campus communities and neighborhoods to gauge their interest,

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[13] Monarrez, Tomas. Urban Institute, Structural Racism Explainer Collection, *Policies Available to School Districts to Dismantle Racial Segregation in Public Schools*.

[14] McCrummen, Stephanie and Birnbaum, Michael. *Study of Montgomery County schools shows benefits of economic integration*. (Oct. 15, 2010) Washington Post.

[15] Berwick, Carly. (Oct. 26, 2018) *3 Promising Models of School Integration: With racial integration facing legal challenges, school districts are finding new ways to create more diverse schools that reflect their communities*. Edutopia.

examining the feasibility of expanding the pilot, and assessing the potential impact of doing so on enrollment patterns districtwide.

Another modification of our enrollment policy aimed at making more OUSD schools more reflective of our city's socioeconomic diversity which we will explore is to study the effects of our current school boundary lines, and how we might redraw them to increase school integration. The Urban Institute notes that "small, equity-minded changes to racial borders in school boundaries can have massive impacts on school integration without increasing commuting burdens and without overhauling the entire school assignment system."[16]

Additionally, our planning work will include another recommended strategy for reducing school segregation. As advised by the Urban Institute, "School leaders should note the key barriers preventing parents from buying into integration and address them." Engaging community members' to probe their perspectives in order to identify such barriers will be a focus of our multilingual survey among parents of children in specific grade-level citywide survey as well as our community engagement and qualitative data collection (via focus groups and interviews) in **higher-income communities** in the Oakland hills and north Oakland.

[16] Monarrez, Tomas. Urban Institute, Structural Racism Explainer Collection, *Policies Available to School Districts to Dismantle Racial Segregation in Public Schools*.

(v) Sustainability plan and stakeholder support

Our intention is for the Oakland Schools Diversification Plan we produce as a result of this planning process to be a blueprint and guide for our work to make our schools more socioeconomically diverse and reflective of our city's population over the next 10 years, and beyond. The data analytics, management, and tracking tools we develop as part of this project will also help us to sustain this vital effort. Through its dissemination, the Oakland Schools Diversification Plan will help the district garner support among stakeholders in our school communities, the city's policymakers, and the philanthropic community.

Project team members are current OUSD staffers who will be able to utilize the knowledge and expertise they gain through this project in their ongoing work after the grant project. The professional development activities for educators prescribed by the Diversification Plan—such as training on effective approaches to desegregation in other districts, and strategies for creating an atmosphere of inclusion in our schools—will support the sustainability of our work to provide integrated and equitable education for all students. They can be funded as part of our implementation of the Plan after the grant period via state funding streams for professional development and identified in our annual Local Control Accountability Plan, required of all California school districts and used to allocate funding through the state's Local Control Funding Formula structure.

We envision that the Diversification Plan will prescribe periodic community engagement activities to inform this long-term effort—such as surveys and focus groups

with Oakland families, and key informant interviews with educators and other stakeholders in our schools. As we implement the Plan after the grant period, this work can be incorporated in the outreach conducted by the Student, Family & Community Engagement unit of our Office of Equity. OUSD's Communications & Public Affairs Department will be a valuable resource working with our Enrollment Office to produce marketing materials and both collect feedback and disseminate information to Oakland communities as our work evolves over time. The collaborative nature of our project, which includes support from several local grassroots organizations, the University of California, and other key organizations is another avenue through which we will gain and sustain support for our efforts to better integrate our schools.

We are confident that in the years ahead, the work guided by our Diversification Plan and supported by the community will lead to more integrated schools that serve all students more effectively. We will be able to demonstrate this success through data and success stories—which will help us to attract support from the philanthropic community and other stakeholders who share our commitment to ensuring that all young people in Oakland have equitable educational opportunities through which to learn and thrive.

(c) Project services

(i) Strategies to ensure equal access and treatment

OUSD serves a highly racially, linguistically, religiously, culturally, and socio-economically diverse community of children and families. We are committed to ensuring educational equity and access to all students, faculty and other staff, and

family members regardless of age, race, sex, religion, national origin, disability, economic background, or sexual orientation. Our district has extensive experience and multiple policies and procedures in-place for making programming responsive to our school communities' diverse populations. We strive to hire staff that reflect the ethnic, cultural, and linguistic backgrounds of the students and families with whom we work. During the recently-ended 2022-23 school year, district-wide, our 5,000+ teachers and other school and district staff members were, collectively, 31% African American, 29% White, 19% Latinx, 12.7% White, 13% Asian, and 4% Other. All staff members in OUSD receive ongoing training relating to diversity and working effectively and empathetically with diverse populations, which include our students and their families as well as the staff itself.

We have designed the proposed Oakland Schools Diversification Project so that the community engagement and needs assessment we undertake that will inform our Schools Diversification Plan provide equitable access and treatment to school community members from traditionally underrepresented groups.

- We will prioritize engaging parents, students, and educators from traditionally underrepresented groups to be members of our project Advisory Group, to help us plan outreach so that it is inclusive and equitable.
- We will include on our project team a staff member from OUSD's Office of Equity's Student, Family & Community Engagement team, who will serve as the project's Community Outreach Manager (.10 FTE). She will consult with colleagues in her office and at school sites to guide outreach strategies and

develop outreach materials so that they promote equitable access to stakeholders from all groups.

- In Year 1, outreach (surveys, focus groups, and 1:1 empathy interviews) regarding our 2020-23 pilot project and its potential expansion will be focused on learning about the experiences of families, especially those in high-poverty Census tracts, who participated in the pilot designed to better integrate low-FRL schools and improve academic experiences. The Office of Equity will direct this work to learn about the pilot's impact and will recruit respondents and conduct surveys, focus groups, and interviews in English as well as other languages as appropriate.
- The Office of Equity will engage and partner with grassroots organizations including Oakland Natives Give Back, Equity Allies, Get Schooled, Oakland Reach to help with town halls that will be held to share the results of the pilot project and generate interest in both expanding the effort and, more generally, in increasing integration in Oakland schools. Participation from community organizations will help ensure we provide multiculturally sensitive outreach to help us connect with and involve parents/caregivers from historically underrepresented groups (e.g., low-income, BIPOC, non-English speaking).
- OUSD's Student, Family & Community Engagement team will help us create outreach materials, convene town halls, and conduct interviews that are accessible to school community members from the most represented cultural/linguistic groups.

- Our citywide survey in Year 1 of Oakland parents with children ages 0-4, children in 3rd and 4th grade, and children in 6th and 7th grade, will be conducted in as many as nine languages in order to maximize diverse participation and ensure our results are representative of as many of the cultural/linguistic backgrounds in our city as possible. Analysis of survey data will also include disaggregation of results by language to inform marketing and communications strategies and other components of our Schools Diversification Plan.
- For the Year 1 town halls and workshops to elicit the perspectives of family members from higher-income communities regarding factors that might encourage them to choose OUSD schools for their children, OUSD's Translation Unit will assist 510media to prepare outreach materials and provide interpretation services in languages other than English as necessary.
- Our Communications & Public Affairs Department and Translation Unit will also assist 510media in designing the messaging and materials for the enrollment marketing strategy to promote more diverse schools, informed by our Socioeconomic Segregation Report, which we will deploy and test before finalizing our comprehensive desegregation plan.

(ii) Likely impact of project services on intended recipients

This is a planning and capacity-building project that will enable OUSD to develop an effective, large-scale, long-term effort to make our schools more socioeconomically diverse. By the end of the two-year grant period, we will have produced the Oakland Schools Diversification Plan and gained approval for its implementation by OUSD's

School Board. The Plan will be informed by a comprehensive fact-finding and community engagement process, known best practices in integrating schools, and contributions by experts in community engagement, data analysis, marketing, and communications. During the grant period we will also augment the district's capacity to manage and monitor enrollment data in order to inform ongoing refinement of strategies to promote diverse schools. In that respect, the project will make a huge positive impact on OUSD's readiness to launch this kind of an effort and to ultimately succeed. We also anticipate that the completed Oakland Schools Diversification Plan we produce and disseminate, along with our experiences in undertaking this planning project—which we will document and share—will benefit school districts across the country. Additionally, because of our collaboration with U.C. Berkeley, we anticipate some of our solutions (especially related to our assignment algorithm) will have broad applicability and will get a wider audience, thereby benefiting low-income students across the country who today have less access to critical resources.

The Plan itself will be designed to reach and benefit Oakland young people, families, educators, and the community as a whole. We expect that, over time and for many years, thousands of more young people growing up in Oakland than currently will attend socioeconomically diverse schools with inclusive, and equitable environments where they receive a well-rounded education through which they learn, socialize, develop, and prepare for adult life. Because this is a planning and capacity-building project, under ***Absolute Priority 1–Developing or Enhancing a Comprehensive Plan***

to Increase Socioeconomic Diversity—rather than a project to implement such a comprehensive plan—it will not lead to immediate, direct benefits for the intended recipients. These will accrue once we launch the Plan's implementation after the grant period. We anticipate increasing socioeconomic diversity within two years post-grant—and increasingly so over time, benefiting more and more Oakland young people. This will lead to invaluable benefits to our city and to American society at large.

(iii) Focus on those with the greatest needs

While this project will engage a socioeconomic cross-section of Oakland families, several of our planning activities will reach and give voice to school families with the greatest needs. In our city, as nationwide, they are mostly likely to be those living in poverty or on low incomes and whose children qualify for free-or-reduced priced school lunches, and BIPOC community members, who have higher rates of socioeconomic disadvantage than than their white counterparts.

One of our needs assessment/planning activities will engage parents/caregivers in socioeconomically disadvantaged families who took part in our 2020-23 school integration pilot, to hear about the impact of that process on their family's experiences and their children's education.

Another planning activity will engage parents/caregivers in low-income school communities to share their perspectives on current enrollment patterns at their children's schools in OUSD and what they may mean for educational equity, and to explore their interest in having their children take part in efforts to better integrate our

schools—such as by having them attend schools in other neighborhoods that currently have relatively few socioeconomically disadvantaged students.

Our citywide survey of parents of children in different age- and grade-spans to deepen our knowledge regarding factors that shape Oakland families' school choices, we will make special efforts to recruit high-need parents/caregivers to respond to the survey. As noted earlier, we plan to conduct the survey in as many as eight languages in addition to English. We will offer both phone and online options to complete the survey.

Our project team will leverage resources from our district's Student, Family & Community Engagement office, including its Translation Unit, to facilitate participation by Oakland residents with limited English proficiency. We will conduct multilingual outreach to publicize the purpose of our project, recruit participants for different opportunities to engage with the project, and conduct surveys, town halls, focus groups, and interviews in multiple languages as needed to give full access to high-need members of the OUSD community.

The Oakland Schools Diversification Plan we develop through this project will prioritize strategies to ensure that our schools are better integrated socioeconomically, and that young people from the highest-need families have full access to educational, enrichment, and support activities as part of a well-rounded education.

(d) Project personnel

(i) Prioritizing employment from persons from underrepresented groups

OUSD aims to have all its staff represent the diversity of our city so that all students see people who look like them and share life experiences in our classrooms, recreational spaces, and offices. As noted earlier, during the 2022-23 school year, OUSD's 5,000+ teachers and other school and district staff members were collectively 31% African American, 29% White, 19% Latinx, 12.7% White, 13% Asian, and 4% Other. For this project specifically, we have identified four key staff members who will comprise our project team; three of them are black, indigenous, or other people of color (BIPOC; see Project personnel, below). Moreover, in selecting the community partners and contracted service providers for this project, we have prioritized engaging organizations where most of the staff members are BIPOC or part of other historically underrepresented groups, many of whom have deep roots in the disadvantaged Oakland communities they are committed to advancing.

(ii) Project personnel

A project team of OUSD staff will lead implementation of the Oakland Schools Diversification Project. It will meet weekly to plan and coordinate activities, and to study and discuss effective practices in diversifying schools and enrollment initiatives for that purpose. Members will communicate on an ongoing basis to facilitate the work. Project team members will include:

Kilian Betlach, OUSD's Executive Director of Enrollment & Registration, will serve as **Project Director** (.10 FTE). In that role he will be responsible for leading the project team, convening the Advisory Group, managing subcontracts with service providers, writing the "Socioeconomic Segregation" report and the Oakland Schools Diversification Plan in collaboration with the Project Manager, and reporting to the grantor. Prior to beginning his current position in 2022, Kilian was Principal at Elmhurst United Middle School in OUSD for 10 years after serving as its Assistant Principal for three years. Before that, he was an English/ED teacher in public schools in the San Jose area. He has an Administrative Services Credential and a Master's degree in Educational Leadership.

An OUSD Administrator on Special Assignment (to be identified) will serve as the **Project Manager** for this Oakland Schools Diversification Project (.80 FTE). S/he will co-convene and facilitate project team and Advisory Group meetings with the Project Director; help schedule and coordinate community outreach, surveys, focus groups, and interviews, and listening sessions; oversee data collection for the project; liaise with school leaders, collaborating community organizations, the contracted service providers, and the project evaluator; co-coordinate the development and writing of the Educational Disparities report (Year 1) and the Oakland Schools Diversification Plan (Year 2); and work with the Project Director and evaluator to prepare required reports to the U.S. Department of Education.

Robert Jordan, Publications Manager in OUSD's Enrollment Office, will serve as the **Increasing Enrollment Project Manager** for this Oakland Schools Diversification Project (.20 FTE). He will assist in coordinating the citywide survey and the focus groups with Oakland families from higher-income communities; and oversee beta testing of enrollment marketing strategies toward the end of Year 1 of the grant period, and oversee the rollout of marketing strategies in the Schools Diversification Plan in Year 2, in collaboration with contracted service providers. Robert, who is Black, has worked in Communications for different school districts for the past eight years, after working as a journalist for seven years. He has a Master's degree in Public Administration.

Angel Ho, from our Office of Equity's Student, Family & Community Engagement team, will serve as the project's **Community Outreach Manager** (.10 FTE). She will coordinate with the project team, schools, partner organizations, and service providers to reach out to families, teachers, and other educators to engage them in surveys, focus groups, interviews, and town halls. She will work with the project team to develop community outreach materials and outreach strategies. Angel is Chinese-American; she has worked for OUSD since 1993, as an interpreter/translation specialist to facilitate parent engagement and at community events and Board meetings, and liaison to the East Asian community.

Rohit Verma, Data Analyst in our Enrollment Office since 2022, will serve as the **Data Specialist** and point person for the project's enrollment data analysis activities

(.15 FTE in Year 1, .10 FTE in Year 2). He will work closely with U.C. Berkeley Assistant Professor Zeyu Zheng to support the analysis of our assignment system and pilot project by providing and generating enrollment data needed for that work. He will also support the needs assessment by facilitating access to family contact information and develop new data management tools and dashboards to advance our work to promote diverse schools in the years ahead. Rohit, who is South Asian, has five years of prior work experience and expertise in data analytics, programming, developing and personalizing data dashboards. He previously developed and launched an app to systematically improve teacher intervention and student engagement in math classrooms. A former teacher and recruitment manager for Teach for America, he has a Bachelor's degree in Business Administration from the University of Southern California.

The project team will invite community partners and contractors involved in the project to our weekly meetings as appropriate to increase our knowledge of effective practices to diversify our school student populations, help plan, coordinate, and discuss project activities, and problem solve. We will also hold a retreat each year for members of our Enrollment Office, Communications & Public Affairs Department, and Student, Family, and Community Engagement Office to advance our knowledge of effective practices in promoting diverse schools and advancing equity in education and advance our planning and capacity-building work.

In addition, to support this project, the Project Director will convene and facilitate a project Advisory Group. It will include our project team members and representatives

from our community partners, including Oakland Reach, Get Schooled, Equity Allies, Rigorous Love, Oakland Natives Give Back, the Bridges Collaborative, and representative OUSD stakeholders including one or more students, parents, school leaders, and teachers. It will meet at least quarterly; its role will be to inform the project's implementation, contribute expertise regarding challenges and best practices in making schools more socioeconomically diverse and attracting more students to the Oakland Schools, monitor the project's progress, and make recommendations for ongoing improvements.

(e) Adequacy of resources

(i) Project partner commitments

While implementing this planning grant, we will rely on many partners and also create and strengthen collaborations that will serve us once we have a Diversification Plan—a roadmap to integration. We will partner with local organizations already working to support Oakland residents and schools; researchers at U.C. Berkeley interested in helping us integrate and improve student outcomes; the Bridges Collaborative of The Century Foundation, a national initiative supporting school integration; parents involved in our full-service community schools, area school leaders from other districts, and other stakeholders we will identify and draw into the process and to the Advisory Group, if we receive funding. Community-based organizations, including Oakland Natives Give Back, Get Schooled, Oakland Reach, and Equity Allies, will bring close ties to communities in

Oakland and will help promote and facilitate town halls and other activities designed to elicit feedback from families, especially those now underserved. And personnel from these organizations will serve on the project's Advisory Group, and help recruit Oakland students and parents to join the group.

We are also contracting with two project partners, FM3 and 510media, to conduct the surveying, interviewing, and outreach in the community and to help develop a marketing campaign designed to increase enrollment and integration in Oakland schools. Both organizations have extensive expertise in these areas, as well as local knowledge, community ties, and experience in public education.

(ii) Reasonableness of project costs

OUSD is requesting $975,477 in grant funding over two years for the proposed project. This funding promises to yield substantial benefits to Oakland families, schools, communities, and we hope to other school districts committed to integrating their schools and classrooms. The funding will enable us to develop a comprehensive, long-term plan to guide us in making all our schools more diverse. And it will help build capacity in our district to implement the plan successfully, achieve its goals, make changes when needed, and direct the effort for many years.

We will allocate 42% of the grant monies for the time project team members devote to this work. While devoting this time to ultimately producing the Oakland Schools Diversification Plan during the grant project, they will gain knowledge and expertise which they can apply to the Plan's implementation in the ensuing years. The

enhanced tools for data management and analysis regarding school enrollment patterns we develop during this capacity-building effort will also be key to the Plan's implementation, ongoing monitoring of its impact, and refinement of strategies in the coming years.

We will allocate 22% of the grant funding to subcontract with professionals in community engagement/research and marketing activities included in this project that will be crucial to the development of a School Diversification Plan that incorporates the voices of a diverse and robust number of stakeholders (parents, students, educators) in providing input into and shaping our plan so that it is responsive to realities that affect school enrollment and includes effective marketing and communications strategies. The next largest portions of grant funding will be used for beta testing of enrollment marketing strategies and planning and launching the new planned marketing campaign for our new schools diversification/enrollment initiative (13%); to contract with an external evaluator who will assist us in areas including project documentation, continuous improvement, and dissemination (6%); for an expert consultant to help in writing our Socioeconomic Segregation of the Oakland Schools report and the Oakland Schools Diversification Plan (4%); and with a tech firm to install a survey mechanism into our enrollment management system (3%).

It is important to note that grant funding will leverage additional resources that will contribute to our development of the School Diversification Plan. These include, but are not limited to, the expertise, analysis, and recommendations of our community partner

U.C. Berkeley and its College of Engineering; the expertise of staff in our Enrollment Office; our Student, Family & Community Engagement team's connections to and relationships with our school communities; data management and analysis resources provided by OUSD's Department of Research, Assessment & Data; and the time, expertise, and perspective of the stakeholders who take part in the project Advisory Group.

Overall, we believe that the $970,000+ investment in federal grant funding is quite reasonable for a project of this size and scope to plan and build capacity for the coming years to better integrate schools across our highly diverse city of over 430,000 residents, and to advance similar efforts in other communities and school districts.

(f) Project management plan

Oakland Unified School District has extensive experience implementing and sustaining grant-funded projects and programs and managing and reporting on federal and state grants. As examples, we have received and effectively utilized large-scale multi-year grants from the U.S. Department of Education, including School Climate Transformation Program (2014-2019), Full Service Community Schools Program (2014-2019), among others. For many years, we have been the recipients and lead agency for multi-site, multiyear, multimillion dollar state and federally-funded after-school program grants (21st Century Community Learning Centers, 21st Century High School Assets, and California After School Education and Safety), as well as a

current, five-year ($66.7 million) California Community Schools Partnership Grant from the California Department of Education.

This project will be housed in OUSD's Enrollment Office and be led by OUSD's Executive Director of Enrollment & Registration. It will derive project team members (described in the Project staff section) and support from others in that same office and our Office of Equity's Student, Family & Community Engagement team, our Translation Services unit (multilingual outreach), as well as our Departments of Research, Assessment, and Data (enrollment and other student data, Communications & Public Affairs (communications, marketing), and Finance Division (payroll, contracting, budget monitoring, grant budget reporting).

As noted, the Project Director and Project Manager will convene and facilitate a project Advisory Group composed of representatives from community partners and various stakeholder groups, which will inform the project's planning, implementation, and midcourse refinements and improvements.

(i) Project work plan and timeline

Table 1. Oakland Schools Diversification Project Work Plan and Timeline

Two-year Project Period: October 2023 to September 2025

Activity/Milestone	Complete by	Responsibility
Execute subcontracts	Oct 2023	PD

Convene project team	Oct 2023, and weekly	PD and PM
Convene Advisory Group	Oct 2023, and quarterly	PD
Hold OUSD staff study retreat	Nov 2023	PD and PM
Design pilot project surveys	Nov 2023	Project Team
Conduct surveys with pilot project families	Nov-Dec 2023	PM
Analyze pilot project data and present findings to project team	Nov 2023-Feb 2024	UCB data specialist
Site visits to school districts in region with experience with school integration/major enrollment campaign initiatives	Nov 2023-Feb 2024	PD and PM
Design pilot project focus groups, interviews	Jan 2024	Project Team
Conduct focus groups with pilot project families	Feb 2024	PM
Conduct interviews with pilot project families	Feb 2024	PM
Document findings from pilot project evaluation	March 2024	PD and PM

Plan town hall listening sessions around potential expansion of pilot	Dec 2023-Jan 2024	Project Team
Advertise town hall sessions	Jan 2024	PM and COM
Hold town hall sessions	Feb 2024	PM
Compile report on issues surfaced in town hall sessions	Mar 2024	PM and COM
Conduct analysis of potential impact of expanding project project	Feb-Mar 2024	PM, Data Specialist
Design survey targeting parents of children in specific grade levels citywide	Nov-Dec 2023	IOPM, FM3 Research
Conduct citywide survey	Jan-Feb 2024	IOPM, FM3 Research
Provide and present survey results to OUSD	Mar 2024	FM3 Research
Design focus groups for higher-income Oakland families	Jan 2024	IOPM, 510media
Conduct focus groups with higher-income families	Feb 2024	IOPM,

		510media
Design interviews for higher-income families	Feb 2024	IOPM, 510media
Conduct interviews with higher-income families	Mar 2024	IOPM, 510media
Complete “Socioeconomic Segregation” report on the Oakland schools	July 2024	PD, PM, writing consultant
Year 1 report to U.S. Department of Education	Oct 2024	PD, PM, HTA
Design PR communications campaign to attract higher-income Oakland families to OUSD	Sept-Oct 2024	510media
Hold OUSD staff retreat	Oct 2024	PD and PM
Beta test marketing/communications strategies	Nov 2024-Feb 2025	510media
Site visits to school districts in region with experience with school integration/major enrollment campaign initiatives	Nov 2024-Feb 2025	PD and PM

Design outreach/marketing plan component of new Oakland Schools Diversification Plan	March-April 2025	510media
Develop tools, systems for ongoing enrollment data tracking and analysis	January-May 2025	PD, PM, Data Specialist
Write Oakland Schools Diversification Plan	May 2025	PD, PM, Writing Consultant
OUSD Board approves Schools Diversification Plan	June 2025	OUSD Board
Launch marketing campaign detailed in Oakland Schools Diversification Plan	July 2025	PD, 510media
End of Year 2/Final report to Department of Ed	Oct 2025	PD, HTA
Prepare and disseminate this project to other LEAs via posting on OUSD website, white paper, and conference presentations	Sept 2025, and ongoing	PD, HTA
*PD = Project Director; PM = Project Manager; Increasing Enrollment Project Manager = IEPM; COM = Project Community Outreach Manager; HTA = HTA Consulting (evaluator)		

(ii) Procedures for feedback and continuous improvement

OUSD's project team will meet weekly to coordinate our implementation activities, discuss progress, troubleshoot, problem solve, and refine our work as appropriate. We will invite community partners and contractors to these meetings as appropriate to help plan, coordinate, and discuss project activities and stay abreast on our progress. The Advisory Group and our external evaluator will help monitor and identify needed improvements. As noted, the Advisory Group will meet at least quarterly to help us plan and implement the project, monitor and discuss our progress, troubleshoot challenges that arise, and inform ongoing improvements.

As detailed in (g) Project Evaluation below, our external evaluator (HTA Consulting) will take part in project team meetings periodically to report on its work, discuss any issues that arise around data collection and sharing, and problem solve. We may ask the evaluator to join Advisory Group meetings for this same purpose. After the project's first year, the evaluator will prepare an annual report documenting: (1) project implementation steps and progress in relation to the plan detailed in this application; (2) notable successes; (3) barriers or other challenges that arise, and measures taken to address them; (4) project performance on our goals and objectives; and (5) recommendations for program improvement for the following year. The evaluator will also make a presentation on the project evaluation findings to the project team and Advisory Group. We will use this feedback to inform improvements in our planning and capacity building work. Further, the final report prepared by the evaluator,

and a white paper and/or other publications the evaluator helps us prepare for dissemination, will provide guidance for both OUSD's continuing work to better integrate our schools, that similar efforts in other school districts.

(iii) Contributions to the project from diverse perspectives

We will ensure we bring a diversity of perspectives to bear both in carrying out this planning project and in the development of the Oakland Schools Diversification Plan.

As noted, we plan to convene an Advisory Group to inform and help us monitor the project's implementation. It will include our project team members (all from OUSD's district office); representatives from these stakeholders in the Oakland schools (parents, students, school leaders, and teachers); personnel from the community partners that will be involved in engaging community members for our needs assessment and planning work; and experts from the Bridges Collaborative, a hub for practitioners from across the country involved in working to promote diverse schools and diverse neighborhoods, and from academia, including extant knowledge on effective practices in increasing school integration.

Our project's needs assessment/community engagement strategy will center the importance of diverse perspectives—to inform the plan to diversify our schools.

- We will engage experts in school integration/diversification efforts and in enrollment strategies for this purpose to advance the relevant knowledge of our project team, other staff in OUSD's Enrollment Office, Communications & Public

Affairs Department, and Student, Family & Community Engagement Office, and Advisory Group members and to inform our planning.

- We will also engage data analysis experts from U.S. Berkeley to analyze OUSD's enrollment data, including the effects of our recent pilot project, to deepen our knowledge of why families choose the schools their children attend now and to inform strategies (including changes to our school assignment system) that will encourage students of all income levels to attend all Oakland public schools and thereby reduce income segregation.
- To understand factors OUSD families consider when choosing schools for their children, we will survey broad samples of Oakland parents/caregivers of children from different socioeconomic and demographic backgrounds, as well as conduct focus groups, interviews, and town halls with parents/caregivers with household incomes ranging from very low to high.
- We will also conduct surveys, convene focus groups with, and interview parents, teachers and school leaders at Oakland schools to understand their experiences in our 2020-23 school integration pilot project.
- Our community engagement work will include outreach and information gathering to parents from higher-income families and communities who are opting out of district schools.

This project will also benefit from the knowledge and perspectives of our external evaluator, HTA Consulting, whose contribution will include offering recommendations for improving the project's implementation and impact.

(g) Project evaluation

(i) Evaluation methods

OUSD will engage an experienced external evaluator (HTA Consulting) to collaborate with our project team to conduct a project evaluation and to assist us in preparing required reports for the Department of Education as well as materials to disseminate information about this project to other school districts. Based in neighboring Berkeley, the HTA Consulting team has 25 years of ongoing experience evaluating federally-funded projects in a variety of fields. Its PhD- and master's level team members have worked with school districts, institutions of higher education, and other agencies to evaluate projects supported by grants from U.S. Department of Education programs, including Promise Neighborhoods, Full Service Community Schools, Investing in Innovation, among others.

The project evaluation will include both a process evaluation to monitor and assess program implementation, and a summative evaluation to assess performance vis-à-vis our overall project goal and objectives. It will employ mixed methods approaches, and yield periodic findings and feedback on our progress in achieving our project goals and objectives.

The *process evaluation* will examine implementation of the Oakland Schools

Diversification Project during the two-year grant period and the degree to which its research, community engagement, and other planning activities adhered to the plan for this project detailed in this grant application. For each project component, the evaluator will document who carried out and contributed to the work, what the work entailed, and who participated in the work or who it reached.

Table x. Process Evaluation of the Oakland Schools Diversification Project

Implemented as Planned?	Data to be Collected and Documented
Pilot project evaluation	• # of survey respondents, over which time period • # of focus groups held, dates, locations • # of focus group participants • Socioeconomic and demographic information on participants • Who developed the tools, facilitated the groups, conducted the interviews • Analyses of pilot project data conducted and by whom
Analysis of impact of expanding pilot	• What this analysis entailed • Who conducted it

School/community engagement vis-a-vis pilot expansion	• # of town hall listening sessions held, their dates and locations • School communities/neighborhoods involved • Facilitators of sessions • Languages utilized in sessions • # of town hall session participants
Citywide study of factors shaping Oakland families' school choices	• Methods used to administer the survey • # of languages survey administered in • Time frame in which survey administered • # of survey respondents, by language of survey • Socioeconomic and demographic variables, children's grade level(s), and neighborhood of survey respondents compared to overall population
Outreach to families in higher-income communities opting out of OUSD	• # of focus groups held, dates, locations • # of focus group participants • Participants by neighborhood • Participants by race/ethnicity
Development and beta testing of	• Communications methods, materials, platforms utilized • Who campaign targeted

marketing strategies	• Information about who it reached
Development of Oakland Schools Diversification Plan	• # of participants in Plan development • Process and timeline for its development • Process and timeline for Board approval
Expansion of data capacity	• Tools developed for data collection, management, analysis • How it was developed, by whom, in what time frame
Launch of enrollment diversification marketing plan	• Components of the plan • Who it targeted • How it was deployed, in what time frame

The *summative evaluation* will study and document whether the project achieved its stated goals, objectives, and outcomes, presented at the beginning of (b) Project design on pages xx-xx, above. Please see **(ii)** Use of objective performance measures, quantitative and qualitative data, below, regarding the data sources we will utilize to evaluate project outcomes and success.

Table x. Summative Evaluation of the Oakland Schools Diversification Project	
Project objective	**Questions the evaluation will answer**

1:1 Needs assessment and community engagement	To what extent did the project succeed in engaging a diversity of voices from key stakeholder groups to help us understand the contributors to socioeconomic disparities in school enrollments across OUSD schools? How did OUSD incorporate stakeholder feedback to inform the Oakland Schools Diversification Plan?
1:2 Production of “Socioeconomic Segregation” report	Was this report developed as planned during the first year of the grant period? To what extent did it inform the Oakland Schools Diversification Plan?
1:3 Development of Oakland Schools Diversification Plan	Was the Plan developed and approved by the Board during the two-year grant period? What does the Plan include?
1:4 Increased internal data management/analysis capacity to monitor enrollment trends	Did OUSD succeed in developing tools to be able to closely and comprehensively monitor enrollment patterns and disparities, in order to gauge our ongoing work to diversify our schools and inform strategies to accelerate our progress?
1:5 Testing of enrollment	To what extent did OUSD launch the enrollment

marketing strategies	marketing strategies included in the new Schools Diversification Plan during the grant period? What were some of the challenges or successes?
2.1 Implementation of Oakland Schools Diversification Plan	Did OUSD implement the Schools Diversification Plan within two years of the end of the grant period? What did implementation entail?
2.2 Increase in schools within +/-5 percentage points of FRL average	Has implementation of the Plan succeeded in increasing the number of schools within the desired FRL percentages within 3 years post-grant?
2.3 Narrowing of enrollment disparities between high- and low-FRL schools	Has implementation of the Plan succeeded in substantially narrowing these disparities within 3 years post-grant?

(ii) Use of objective performance measures, quantitative and qualitative data

OUSD's goals and objectives for this project are in alignment with the performance measures established for projects under Absolute Priority 1. Table xx details the sources of data, both quantitative and qualitative, collected during the implementation of this project which HTA will utilize to monitor and assess program implementation and evaluate the project's performance and outcomes. Note: Since this is a planning project

primarily focused on ***developing*** (rather than implementing) a comprehensive plan to increase socioeconomic diversity in OUSD schools, there is very little baseline data related to our performance measures and indicators. Only when OUSD implements the new Schools Diversification Plan after the grant period will it be possible to compare the outcomes vis-a-vis the socioeconomic diversity of its schools with current (baseline) patterns.

Table x. Performance Measures for the Evaluation of the Oakland Schools Diversification Project

Project objective	Performance measures/indicators
1:1 Needs assessment and community engagement	• Artifacts of engagement sessions (e.g., sign-in sheets, survey tool, flyers, social media announcements) • Survey results • Focus group transcripts • Summaries from focus groups, interviews • Summaries from town halls • Numbers of participants in different engagement strategies, byt stakeholder groups (e.g., families, teachers and other educators, experts) • Socioeconomic/demographic information on

	participants • Evaluator-conducted interviews of key informants (project team members, contractors, community) regarding community engagement process
1:2 Production of "Socioeconomic Segregation" report	• Socioeconomic Segregation report • Documentation of its publication and publication date
1:3 Development of Oakland Schools Diversification Plan	• Oakland Schools Diversification Plan • Documentation of Board approval, publication, and publication date • Interviews with key informants regarding the Plan development
1:4 Increased internal capacity to monitor enrollment data	• Data dashboards
1:5 Testing of enrollment marketing strategies	• Artifacts from digital, social media, posters, billboards, lawn signs, and other marketing vehicles • Marketing analytics when available

2.1 Implementation of Oakland Schools Diversification Plan	• Documentation of strategies put in action (e.g., new school boundaries map, new controlled choice priorities, new enrollment algorithm)
2.2 Increase in schools within +/-5 percentage points of FRL average	• OUSD school enrollment records (both pre- and post implementation)
2.3 Narrowing of enrollment disparities between high- and low-FRL schools	• OUSD school enrollment records (both pre- and post implementation)

Use and dissemination of project and performance data. The project manager will share project data and be in communication with the evaluator on an ongoing basis. The evaluator will take part in project team meetings periodically to report on its work, discuss any issues that arise around data collection and sharing, and problem solve. By October/November following year one of the grant period, HTA Consulting will prepare an annual report documenting: (1) project implementation steps and progress in relation to the plan detailed in this application; (2) notable successes; (3) barriers or other challenges that arise, and measures taken to address them; (4) project performance on our goals and objectives; and (5) recommendations for program

improvement for the following year. The evaluator will also make a presentation on the project evaluation findings to the project team and Advisory Group.

The evaluator will prepare and present a final report within two months after the end of the grant period, documenting the program's implementation, impact, successes, barriers encountered, mid-course corrections if any, and lessons learned. OUSD anticipates distributing this report to various constituencies – including at the district level in HUSD, to our school communities and collaborating partners, and to potential supporters of our ongoing work to integrate the Oakland schools. Moreover, the evaluator will prepare the final report so that it can be adapted for as a white paper or other publication(s) regarding the Oakland Schools Diversification Project to be disseminated to school districts nationwide, in order to inform effective planning activities and strategies to promote socioeconomic diverse schools in other communities.