

Individuals with Disabilities Education Act: Grant Policies and Guidance

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WISCONSIN DEPARTMENT OF
Public Instruction

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Table of Contents

| | |
|---|---|
| Introduction..... | 3 |
| Federal Investment in Statewide Systems Change (FISSC) | 3 |
| Federal Grant Financial Management and Administrative Requirements | 3 |
| Expectations of Grant Recipients..... | 3 |
| Section 1. Roles and Responsibilities..... | 3 |
| 1.1 Fiscal Agents | 3 |
| 1.2 DPI Grant Directors | 4 |
| Section 2. Funding Requirements and Limitations | 4 |
| 2.1 Application Approval | 4 |
| 2.2 Sub-Granting Funds | 4 |
| 2.3 Subcontracting Funds | 4 |
| Section 3. Hiring and Assigning Grant Staff | 5 |
| Section 4. Time and Effort Reporting | 5 |
| Section 5. Indirect and Direct Costs | 5 |
| 5.1 Indirect Costs..... | 5 |
| 5.2 Direct Costs..... | 5 |
| Section 6. Grant Project Evaluation..... | 5 |
| Section 7. Accessibility Standards for Resource Materials..... | 6 |
| Section 8. Acknowledgment Statement in Publications and Products (34 CFR §75.620) | 6 |
| Section 9. Copyright (2 CFR §200.315[b])..... | 7 |

Introduction

The Wisconsin Department of Public Instruction (DPI) Special Education (SPED) Team, in the Division for Learning Support (DLS), provides policies and guidance to recipients of Individuals with Disabilities Education Act (IDEA) Part B and Discretionary Grant funds. Applicants electing to accept IDEA Part B discretionary funding must comply with all the applicable requirements set forth in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR); the Education Department General Administration Regulations (EDGAR) requirements; state statutes; and the rules, policies and guidance, and assurances and certifications as prescribed by the DPI.

Federal Investment in Statewide Systems Change (FISSC)

The DPI invests in statewide systems change efforts through a number of IDEA Discretionary Grant projects and other supports. Working together, these projects translate high-priority areas of educational research into actionable strategies and supports to improve outcomes for all learners and accelerate improvement for learners with IEPs and learners of color. FISSC Vision: Deconstructing and co-creating systems to support each and every learner. FISSC Mission: Leverage the intersecting resources of discretionary grant projects to develop and deliver embedded professional learning to change adult behavior in measurable ways.

Federal Grant Financial Management and Administrative Requirements

Below are links to the Uniform Administrative Requirements and the EDGAR Title 34 CFR, Part 76, which governs the administration of IDEA Part B Discretionary funds.

- [The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#) establishes uniform grant guidance for federal awards to non-federal entities.
- [EDGAR Title 34 \(Education\), CFR Part 76](#) establishes the regulations for State-administered programs of the Department of Education.

Expectations of Grant Recipients

IDEA discretionary grant recipients agree to:

- administer all grant deliverables and activities to improve outcomes for all learners and accelerate improvement for learners with IEPs and learners of color.
- serve as ambassadors and points of contact for the IDEA discretionary grant.

Section 1. Roles and Responsibilities

1.1 Fiscal Agents

Fiscal agents are the entities that provide fiscal management, accounting, and reporting services on behalf of the organization receiving funding under an IDEA discretionary grant. The fiscal agent will:

- administer grant funds in accordance with the applicable federal grant financial management and administrative requirements, as well as the DPI policies and guidance;
- submit application materials as outlined in the Notice of Funding Availability (NOFA), including certifications and assurances, project work plan, and budgets;
- hire, contract, or assign grant project staff with the skills and dispositions to fulfill the activities or deliverables as defined in the NOFA in collaboration with the DPI grant directors;
- manage purchasing, submit quarterly financial claims, and submit required reports by due dates, understand and oversee the completion of activities and deliverables as articulated in the NOFA, and submit grant project adjustments to the DPI grant director and collaborate with the DPI grant director in the revision and resubmission of the NOFA or contract in the event there are significant changes made to the grant project.
- Verify that all costs charged to the grant provide direct benefit to one or more deliverables within the grant project.

1.2 DPI Grant Directors

The DPI grant directors plan, direct, and administer grant projects under the direction of the SPED team administration to:

- provide direction, leadership, guidance, and oversight of grant project planning, implementation, and evaluation throughout the grant year;
- work with SPED administrators, grant specialists, and data consultants to develop:
 - a. project goals, activities, deliverables, benchmarks, and report(s);
 - b. funding levels, grant staff structure, and an evaluation plan for the grant project; and
 - c. align grant activities with Annual Performance Report (APR) requirements;
- review applications submissions, including review and approve grant budgets and revisions;
- review grant products for quality and consistency of messaging aligned with the DPI branding and accessibility guidelines;
- oversee grant project evaluation(s);
- ensure those supervising grant funded staff are aware of progress toward meeting grant activities or deliverables at the mid-year and end of the year for the grants they oversee.

Section 2. Funding Requirements and Limitations

2.1 Application Approval

Approval of an application for one fiscal year does not guarantee approval in subsequent years.

2.2 Sub-Granting Funds

Sub-granting funds to any agency or organization is not permitted under any circumstances.

2.3 Subcontracting Funds

Subcontracting funds to other agencies or organizations is allowed upon DPI approval as outlined in the NOFA.

Section 3. Hiring and Assigning Grant Staff

The DPI funds are awarded to agencies with the expectation that they have the capacity, skills, and dispositions necessary to fulfill the activities or deliverables as articulated. The DPI may provide the minimum qualifications necessary for deliverables within an award. The agency is responsible for the hiring, assigning, supervision, and evaluation of staff within their agencies to fulfill the deliverables of an award and as defined in the NOFA or contract.

Section 4. Time and Effort Reporting

For costs to be allowable, compensation for personal services must adhere to the Standards for Documentation of Personnel Expenses as identified in 2 CFR § 200.430(i)(1). The sub-recipient must retain records that accurately reflect the work performed and be supported by a system of internal controls which provide reasonable assurance that the charges are accurate, allowable, and properly allocated.

Section 5. Indirect and Direct Costs

5.1 Indirect Costs

Indirect costs are those that have been incurred for common or joint purposes. These costs benefit more than one cost objective and cannot be readily identified with a single cost objective or project. If the fiscal agent intends to claim indirect cost, the following conditions must be met:

- The total amount budgeted for indirect costs do not exceed the negotiated, restricted indirect rate established with the DPI;
- indirect costs are not charged against capital objects;
- an agency has a negotiated indirect rate with the DPI in order to budget and claim indirect cost; and

5.2 Direct Costs

A cost may not be allocated to a federal grant as an indirect cost if, in like circumstances, any other cost incurred for the same purpose has been assigned to a federal grant as a direct cost. For IDEA discretionary grants, the DPI allows costs such as rent/occupancy, phone, copies/printing, postage/shipping, workmen's compensation and liability insurance, single audit costs, clerical, bookkeeping, and IT personnel support be allocated as direct costs. However, if these are allocated to the grant as direct costs, they must be based on a written, consistently applied formula.

Section 6. Grant Project Evaluation

Grant evaluation is guided by the activities articulated for the grant work. The aim is to focus evaluation efforts on those aspects of the project that research has suggested are causal links in meaningful system improvement. Most grant evaluations will include both process evaluation, which shows the extent to which grant activities are executed with fidelity and how outcomes were achieved, and outcome evaluation, which assesses the effectiveness of the activities in producing change. The type and maturity

of a program will dictate the relative emphasis on process and outcome evaluation. For example, established grants which have been implemented successfully before would have a greater emphasis on outcomes than newer grants.

Grant evaluation will be included as activities within the grant or be developed with the involvement of the DPI grant director. The grant evaluation process is intended to facilitate an ongoing assessment and support of grant activities throughout the grant year. Data from grant evaluations will be used to assess the efficacy of the grant, suggest how to improve the grant, and whether the grant continues to be a good investment of discretionary funds.

All IDEA grant-funded staff will administer data collection tools as requested by the DPI and will be available to grant-funded staff upon request.

Section 7. Accessibility Standards for Resource Materials

Fiscal agents producing resource materials must adhere to accessibility standards. It is a grant expectation for all IDEA-funded projects to make every effort to maximize accessibility for all interested parties. Accessibility includes, but is not limited to; closed captioning for videos, webinars, and audio portions of modules, applications, accessibility checkers, and resources, designating grant funds for translation of products, and formatting websites and other documents to be easily read by screen-reader applications. IDEA-funded grant staff and coordinators should contact the DPI grant director for any assistance needed or questions regarding resources available for maximizing accessibility.

Section 8. Acknowledgment Statement in Publications and Products (34 CFR §75.620)

The content of any grant-funded publications or products may be reprinted in whole or in part with credit to the U.S. Department of Education and the DPI. However, reproduction of products in whole or in part for resale must be authorized by the DPI. When issuing statements, press releases, and other documents describing projects funded in whole or in part with IDEA funds, all grantees receiving IDEA funds shall clearly acknowledge the receipt of IDEA funds.

Grant recipients must include a statement that acknowledges the DPI and the federal source of funding in all publications and products developed with grant funding. Grant recipients must check their specific grant award notifications for the correct CFDA number to include in the acknowledgment statement.

Grant-funded documents such as brochures, flyers, meeting and conference agendas, and other web-based technical assistance resources will not be subject to this formal process unless required by the NOFA. However, they may be submitted to the DPI grant director for review to provide feedback and ensure the DPI branding and communication guidelines are met.

- For grant-funded products such as flyers, brochures, pamphlets, PowerPoint presentations, webinar presentations, formal conference agendas, guides, reports, books, booklets, videos, films, websites, and any other document or product distributed to the public, the following statement must be included:

"The [grant project name] (CFDA #xx.xxx) acknowledges the support of the Wisconsin Department of Public Instruction in the development of this [product] and for the continued support of this federally-funded grant project. There are no copyright restrictions on this document; however, please credit the

Wisconsin DPI and support of federal funds when copying all or part of this material.”

- For larger, more extensive publications such as guides, reports, books, and videos which are longstanding, or to be used for more than one year, an alternative acknowledgment statement must be used.

“The contents of this [product] were developed under a grant from the U.S. Department of Education. The [grant project name] (CFDA #xx.xxx) acknowledges the support of the Wisconsin Department of Public Instruction (WDPI) in the development of this [product] and for the continued support of this federally funded grant project. The content does not necessarily represent the policy of the WDPI, and you should not assume endorsement by the WDPI or the U.S. Department of Education. There are no copyright restrictions on this document; however, please credit the WDPI and support of federal funds when copying all or part of this material.”

Section 9. Copyright (2 CFR §200.315[b])

The U.S. Department of Education and the DPI reserve royalty-free, nonexclusive, and irrevocable right to reproduce, publish, or otherwise use and authorize others to use, for their purposes:

- the copyright in any work developed or contracted under an IDEA grant; and
- any rights of copyright to which the grantee or contractor purchases ownership with grant support.