

# Office of Exceptional Children:

## *IDEA Coordinated Early Intervening Services*

### **Fiscal Guidance**

For use with by Public School Units under Mandatory CCEIS and Voluntary CEIS.

# CONTENTS

*OVERVIEW*.....1

*REQUIRED EARLY INTERVENING SERVICES*.....1

*VOLUNTARY EARLY INTERVENING SERVICES*.....3

*WHAT ARE THE FUNDING PARAMETERS FOR MANDATORY AND VOLUNTARY COORDINATED EARLY INTERVENING SERVICES (CEIS/CCEIS)?* .....4

*WHAT ARE ALLOWABLE COSTS UNDER IDEA FOR REQUIRED AND VOLUNTARY EARLY INTERVENING SERVICES?* .....6

## *Overview*

This document outlines the fiscal requirements for public school units (PSU) required to set-aside 15 percent of federal special education funds toward early intervening services to address significant disproportionality, as well as public school units that elect to voluntarily set-aside funds for early intervening services. Within this document you will also find guidance on allowable costs for early intervening services.

## *Required Early Intervening Services*

### **What are comprehensive coordinated early intervening services (CCEIS)?**

Early intervening services required for PSUs identified with significant disproportionality are known as “comprehensive coordinated early intervening services.”

According to the Individuals with Disabilities Education Act (IDEA) 34 CFR §300.646(b)(2), if a state education agency determines that a PSU has significant disproportionality based on race or ethnicity with respect to the identification of children with disabilities, the identification of children in specific disability categories, the placement of children with disabilities in particular educational settings, or the taking of disciplinary actions, the PSU must use 15 percent of its IDEA Part B allocation for comprehensive coordinated early intervening services. The services are to be designed to meet the needs of the children in the PSU, particularly, but not exclusively, those included in the group identified as significantly disproportionate.

Comprehensive coordinated early intervening services (CCEIS) include:

- Activities that include professional development, educational and behavioral evaluations, services and supports to the identified student population as described above;
- A review and assessment of the factors contributing to the significant disproportionality, including a lack of access to scientifically based instruction; economic, cultural or linguistic barriers to appropriate identification or placement in particular educational settings; inappropriate use

of disciplinary removals; lack of access to appropriate diagnostic screenings; differences in academic achievement levels; and

- A review of the policies, practices or procedures contributing to the significant disproportionality, including a policy, practice or procedure that results in a failure to identify, or the over identification of, a racial or ethnic group (or groups).

### **Which students can receive comprehensive coordinated early intervening services (CCEIS)?**

Per [federal guidance](#), a PSU may use funds reserved for comprehensive coordinated early intervening services to serve children ages 3 through grade 12, particularly, but not exclusively, children in those groups identified as significantly disproportionate:

- Children who are not currently identified as needing special education or related services, but who need additional academic and behavioral support to succeed in a general education environment;
- Children with disabilities; however, districts may not limit the provision of comprehensive coordinated early intervening services to only children with disabilities

*The chart at the end of this document provides guidance on the associated allowable costs under the IDEA for early intervening services.*

### **What are the reporting requirements for comprehensive coordinated early intervening services (CCEIS)?**

Public school units that are required to budget and expend 15 percent of their Part B allocation for comprehensive coordinated early intervening services (CCEIS) are obligated to report the following data yearly to North Carolina Department of Public Instruction Office of Exceptional Children:

- The number of students who receive comprehensive coordinated early intervening services; and
- Of those students who received comprehensive coordinated early intervening services, the number who subsequently received special education and related services within two years after receiving comprehensive coordinated early intervening services.

*The required IDEA CCEIS/CEIS Student Data Log is located within the IDEA 611 Grant application housed in NCCCIP.*

### **Where can we get additional information and resources?**

The IDEA Data Center developed a [Comparison of Mandatory Comprehensive Coordinated Early Intervening Services \(CCEIS\) and Voluntary Coordinated Early Intervening Services \(CEIS\)](#) to distinguish between the use of IDEA funds for CCEIS (mandatory) and CEIS (voluntary) for Public School Units.

The Center for IDEA Fiscal Reporting developed a [Comprehensive Coordinated Early Intervening Services Practice Guide](#) to provide examples of fiscal and student data tracking for required and voluntary early intervening services

## *Voluntary Early Intervening Services*

### **What are coordinated early intervening services (CEIS)?**

Early intervening services voluntarily implemented by districts are known as “coordinated early intervening services.”

According to IDEA 34 CFR §300.226, regulations permit a district to voluntarily use up to 15 percent of its Part B allocation to develop and implement coordinated early intervening services. PSUs may use these funds to provide academic and behavioral intervention services for students without disabilities in kindergarten through grade 12, with a preferred emphasis on grades K-3.

PSUs are encouraged to use IDEA funds for coordinated early intervening services for students who are not currently identified as having a disability, but who may need additional academic and behavioral supports to succeed in a general education environment, and to support the teachers and staff who work with these students.

### **Coordinated early intervening services include (CEIS):**

- Professional development for K-12 general education teachers and other school staff to effectively deliver scientifically based academic instruction and behavioral interventions. This also includes scientifically based literacy

instruction and instruction on the use of adaptive and instructional software;  
and

- Providing educational and behavioral evaluations, services and support to general education students who need additional support to be able to succeed in the classroom.

*The chart at the end of this document identifies allowable costs under the IDEA for early intervening services.*

### **What are the reporting requirements for coordinated early intervening services (CEIS)?**

Pursuant to IDEA 34 CFR §300.226(d), PSUs that elect to use up to 15 percent of their Part B allocation for coordinated early intervening services are obligated to report the following to the NCDPI Office of Exceptional Children:

- The number of students who receive early intervening services; and
- Of those students who received early intervening services, the number who subsequently received special education and related services within two years after receiving early intervening services.

### ***What are the funding parameters for mandatory and voluntary coordinated early intervening services (CEIS/CCEIS)?***

#### **Supplement, Not Supplant**

The US Department of Education presumes a Public School Unit is in violation of the *IDEA*'s supplement not supplant provisions if it uses *IDEA* funds in one of the following ways: (1) to provide services that are otherwise required by Federal, State or local law; or (2) to provide services that were paid for with other funds in a prior year, including, if the *IDEA* funds are used for CEIS activities coordinated with activities funded under the *ESEA*, and the *IDEA* funds are used to provide services that were paid for with *ESEA* funds in the prior year. CEIS may not include services that were provided with other funds in a prior year, including services that were paid with *ESEA* funds. An LEA might be able to rebut these presumptions through the presentation of evidence that, even without CEIS funds, the other funds would not have been used in the current year for the activities now paid for

with CEIS funds. Additional supplement not supplant provisions apply to Federal funds provided under Titles I and III of the *ESEA*.<sup>[4]</sup> If an LEA chooses to use CEIS funds for activities aligned with activities funded under Titles I and III, it must meet those requirements.

Federal IDEA Part B funds budgeted for coordinated early intervening services may be used to supplement, but not supplant, services aligned with activities funded by and carried out under any federally funded project. There is no “supplement, not supplant” requirement for state or local funds (34 CFR §300.208 (a)). Funds for coordinated early intervening services may be used to support a multi-tiered system of instruction and intervention but may not be used to support the implementation of core (universal) Multi-Tiered System of Support (MTSS) instructional. MTSS is a total school improvement framework for all students.

### **Time and Effort**

Per the requirements for federal awards (2 CFR §200), any individual whose personnel costs are charged to a federal grant must provide time and effort documentation, semi-annual certification of a single cost objective or monthly personnel activity reports. Semi-annual certifications of a single cost objective are to be completed by/for those individuals whose work meets the definition of a single cost objective. Monthly or pay-period personnel activity reports are completed by individuals who have multiple cost objectives. District staff must complete a monthly personnel activity report if services are being provided in more than one area and do not solely provide special education or related services for coordinated early intervening services. Time and effort reporting are a part of the allowable costs as defined by the U.S. Office of Management and Budget’s [Uniform Guidance](#).

### **How can I get more information and answers to questions?**

For more information about funding requirements for required and voluntary early intervening services,

please contact your region’s assigned IDEA Fiscal Monitor at [NCDPI Office for Exceptional Children](#) .

***What are allowable costs under IDEA for required and voluntary early intervening services?***

- Symbol Key:**
- ✓ Always allowed
  - ✓ Allowed; special requirements or additional information required
  - ✓ Never allowed

Allowed	Not Allowed	Budget Item/ Activity
✓		<p><b>STUDENT TRANSPORTATION COSTS:</b> Transportation is a limited allowable use of EARLY INTERVENING SERVICES funds. It must be limited directly to access to the early intervening program. The PSU must ensure access is supplemental and not supplanting of services.</p>
	✓	<p><b>COMPUTER NETWORK COSTS:</b> Computer networking costs must be included as part of the district's indirect costs and are not direct budget line items.</p>
✓		<p><b>COORDINATOR SALARY:</b> Funds may be used for salaries and fringe benefits, or a portion thereof, for staff that directly coordinate or supervise allowable early intervening services. A personnel activity report may be required for compensation. Coordination staff costs must be specific to early intervening services activities ONLY and may not include coordination of services intended to benefit all students or students with disabilities.</p> <p>*MTSS coordination would be considered supplanting of CEIS/CCEIS funds. Please refer to the <i>Supplement, Not Supplant</i> section of this document for further guidance. *</p>



		<p><i>*Appropriate Time and Effort and other required documentation will be required to support salary utilized through PRC 70*</i></p>
	✓	<p><b>EVALUATIONS FOR SPECIAL EDUCATION ELIGIBILITY DETERMINATIONS:</b> The costs for student evaluations and determinations is part of Child Find and is a district-required activity separate from early intervening services. Evaluations, including independent evaluations, for determining eligibility for special education are not considered early intervening services.</p>
✓		<p><b>GUIDANCE COUNSELOR SALARIES – SCHOOL BASED:</b> Fundable activities may include a school counselor’s efforts to implement progress monitoring, other early intervening services evaluations, behavioral interventions and related professional development specifically and solely to students targeted for early intervening services. School counselors may not deliver reading or math instruction under early intervening services funding unless they also hold the appropriate license to deliver reading or math instruction and meet highly qualified teacher requirements.</p> <p><i>*Appropriate Time and Effort and other required documentation will be required to support salary utilized through PRC 70*</i></p>
✓		<p><b>INDIRECT COSTS:</b> A school district that has an approved indirect cost rate established through the Office of Grants Management may include an indirect cost amount as part of the 15 percent redirection. The indirect cost percentage used for the district’s IDEA Part B budget in the Comprehensive Continuous Improvement Plan is the same percentage that may be</p>

		used as part of the district's early intervening services budget, as the amounts are part of the same application.
✓		<b>INSTRUCTIONAL EQUIPMENT AND ELECTRONIC DEVICES:</b> Purchase of electronic items such as iPods, iPads, laptops, netbooks, and smartboards whose purpose is direct instructional activities or behavioral supports to students targeted for early intervening services are acceptable. Items must be included in the district inventory of items purchased with Part B funds and meet federal inventory requirements.
✓		<b>INSTRUCTIONAL MATERIALS:</b> Instructional materials purchased with early intervening services funds must be exclusively used for delivering early intervening services including educational and behavioral evaluations, services and supports and scientifically based literacy instruction. Early intervening services funds may not be used to purchase materials used in the core instructional program intended for all students.
✓		<b>INSTRUCTIONAL TECHNOLOGY STAFF SALARIES:</b> A district may employ or contract with instructional technology staff to carry out allowable early intervening services activities. Early intervening services funds may not be used for activities intended for an entire class or school. The IT staff costs must be linked to specific early intervening services activities and not a part of the general cost of a district's IT network costs. District-wide network costs must be included as a part of the district's indirect costs and are not direct budget line items.
✓		<b>MENTORS:</b> A district may hire or contract with individuals or organizations for mentoring services to carry out allowable early intervening services activities. A mentor, unless appropriately licensed, may not

		<p>provide instruction to students. Mentors may only support, reinforce or follow-up on instruction provided by and under the supervision of an appropriately licensed general education teacher.</p> <p><i>*Appropriate Time and Effort and other required documentation will be required to support salary utilized through PRC 70*</i></p>
✓		<p><b>NURSE SALARIES – SCHOOL BASED:</b> Examples of activities that may be funded with early intervening services include a school nurse’s efforts to implement progress monitoring, other early intervening services evaluations, behavioral interventions, and related professional development. School nurses may not deliver reading or math instruction under early intervening services funding if they do not hold the appropriate license to deliver reading or math instruction.</p> <p><i>*Appropriate Time and Effort and other required documentation will be required to support salary utilized through PRC 70*</i></p>
	✓	<p><b>OFFICE EQUIPMENT:</b> The purchase of non-instructional equipment is not an allowable use of early intervening services funds.</p>
✓		<p><b>PARAPROFESSIONAL SALARIES:</b> A paraprofessional must serve as a general education paraprofessional and may:</p> <ul style="list-style-type: none"> <li>• Participate in professional development to enable the paraprofessional to support the delivery of scientifically based academic and behavioral</li> </ul>

		<p>interventions and, if appropriate, the use of adaptive and instructional software.</p> <ul style="list-style-type: none"> <li>• Support, reinforce or follow-up on the provision of educational and behavioral services provided by, and under the supervision of, an appropriately licensed general education teacher.</li> </ul> <p><i>*Appropriate Time and Effort and other required documentation will be required to support salary utilized through PRC 70*</i></p>
✓		<p><b>PHYSICAL OR OCCUPATIONAL THERAPIST SALARIES:</b> Occupational therapy or physical therapy may be a related service provided to students with disabilities in accordance with an Individualized Educational Program or service plan. If occupational or physical therapy is provided to identified students with disabilities, it is not considered an early intervening services-related cost. For students without disabilities for whom early intervening services are determined to be necessary, occupational and/or physical therapy may be determined to be early intervening services and provided until such point as the child may be identified as a student with a disability.</p> <p><i>*Appropriate Time and Effort and other required documentation will be required to support salary utilized through PRC 70*</i></p>
✓		<p><b>PROFESSIONAL DEVELOPMENT SERVICES:</b> A district may purchase and/or provide professional development services for general education teachers and other school staff to enable such personnel to deliver scientifically based academic and behavioral interventions, including scientifically based literacy</p>

		instruction and, where appropriate, instruction on the use of adaptive and instructional software; and providing educational and behavioral evaluations, services and supports. This professional development may include preschool instructional staff and special education instructional staff if the district is mandated to provide comprehensive coordinated early intervening services
✓		<p><b>PSYCHOLOGIST SALARIES – SCHOOL BASED:</b> Examples of activities that may be funded with early intervening services include a school psychologist’s efforts to implement progress monitoring, other early intervening services evaluations, behavioral interventions, and related professional development. School psychologists may not deliver reading or math instruction under early intervening services funding unless they also hold the appropriate license to deliver reading or math instruction and meet highly qualified teacher requirements.</p> <p><i>*Appropriate Time and Effort and other required documentation will be required to support salary utilized through PRC 70*</i></p>
✓		<p><b>PUPIL SERVICES STAFF SALARIES:</b> Pupil services staff include school psychologists, school social workers, school counselors and school nurses. Under early intervening services funding, pupil services staff may not provide services or instruction outside the parameters of her or his license.</p> <p><i>*Appropriate Time and Effort and other required documentation will be required to support salary utilized through PRC 70*</i></p>

	✓	<b>REMODELING/RENOVATION:</b> Remodeling or renovation does not meet the criteria as an eligible expenditure for the use of IDEA Part B funds for early intervening services.
	✓	<b>RENT or OCCUPANCY COSTS:</b> Rent or occupancy costs do not meet the criteria as an eligible expenditure for the use of IDEA Part B funds for early intervening services.
✓		<p><b>SOCIAL WORKERS SALARIES – SCHOOL BASED:</b> Examples of activities that may be funded with early intervening services include efforts from a school social worker to implement progress monitoring, other early intervening services related evaluations, behavioral interventions, and related professional development. Under early intervening services funding, an appropriate license and highly qualified teacher status are required for school social workers to deliver reading or math instruction.</p> <p><i>*Appropriate Time and Effort and other required documentation will be required to support salary utilized through PRC 70*</i></p>
✓		<b>SOFTWARE:</b> Software purchased with early intervening services funds must be exclusively used in the delivery of early intervening services including educational and behavioral evaluations, services and supports including scientifically based literacy instruction for students. Early intervening services funds may not be used to purchase software for the core instructional program intended for all students.
✓		<b>SUBSTITUTE TEACHER SALARIES:</b> Districts may budget for general education substitute teachers to

		implement allowable early intervening services activities.
✓		<p><b>TEACHER SALARIES – GENERAL EDUCATION:</b> Under both required and voluntary early intervening services funding, general education teachers may be compensated with early intervening services funds to provide academic interventions, behavioral interventions, assessments, and professional development to identified, targeted students. For required early intervening services, the group of targeted students may include students currently identified with disabilities and preschool students ages 3 to 5. The instructional staff must be properly licensed and meet highly qualified teacher requirements.</p> <p><i>*Appropriate Time and Effort and other required documentation will be required to support salary utilized through PRC 70*</i></p>
	✓	<p><b>TEACHER SALARIES – SPECIAL EDUCATION:</b> No special education salaries for staff providing services related to a student’s Individualized Education Program may be paid with early intervening services funds. Special education staff may be included in the amounts used to provide early intervening services if the services are designed to address the factors identified as contributing to significant disproportionality. Teachers who hold both special education and general education licenses may provide early intervening services if their job assignment is prorated.</p> <p><i>*Appropriate Time and Effort and other required documentation will be required to support salary utilized through PRC 70*</i></p>

	✓	<p><b>ALTERNATIVE EDUCATION OR AT-RISK PROGRAMING:</b> Funds may be used to provide supplemental academic and behavioral interventions for students determined to need additional academic and behavioral supports to succeed in general education. <i>Funds may not be used for alternative or at-risk programming that replaces universal/core programming.</i> Funds may be used for alternative or at-risk programming that provides interventions in addition to universal/core programming.</p>
	✓	<p><b>SCREENING - SPECIAL EDUCATION CHILD FIND:</b> Funds for activities aimed at identifying, locating, or evaluating students with disabilities including screening for pre-school, hearing, or vision disabilities.</p>
✓		<p><b>TRAVEL (STAFF):</b> Travel costs must be generated from the implementation of early intervening services activities, such as professional development.</p>
✓		<p><b>TUTORS:</b> A district may hire or contract with individuals or organizations for tutoring services to carry out early intervening services activities. Tutors may:</p> <ul style="list-style-type: none"> <li>• Participate in or provide professional development to enable teachers and other school staff to deliver scientifically based academic and behavioral interventions and, if appropriate, the use of adaptive and instructional software.</li> <li>• Support, reinforce or follow-up on the provision of educational and behavioral services provided by and under the supervision of an appropriately licensed general education teacher.</li> </ul>
	✓	<p><b>UNIVERSAL SCREENING:</b> Early intervening services funds may be used to provide services only to students in need of additional academic or behavioral</p>



		support to succeed in the classroom. Early intervening services funds may not be used for activities intended to provide high quality instruction to an entire class or school. Universal screening is part of the core instructional program provided to all students and not principally intended to address the needs of students who are not currently identified as needing special education or related services but who need additional academic and behavioral support to succeed in a general education environment.
	✓	<b>UTILITIES:</b> Utility costs must be included as part of the PSU's indirect costs and are not direct budget line items.