Individuals with Disabilities Education Act (IDEA)
Coordinated Early Intervening Services - Voluntary

Last Updated 11/4/2021

Introduction

The Individuals with Disabilities Education Act, often referred to as "IDEA," provides funding to Local Education Agencies (LEAs) on a non-competitive basis to help defray the costs of providing special education.

The amount of funding each LEA receives annually is based on a formula calculation that is addressed in federal regulations. Because of this, these two grants are often referred to as "formula" grants or, because they are non-competitive, "entitlement" grants.

The "preschool" grant is intended to fund special education services and supports for students ages 3 to 5. The other, much larger source of funding, is called "flow-through" and is intended to fund special education services and supports for students ages 3 to 21.

Together, these two sources are referred to as "Part B" funding because under IDEA these entitlement funds to LEAs are addressed in Part B of the Federal act. The Coordinated Early Intervening Services (CEIS) set-aside provision applies to both grants.

Multi-Level Systems of Support

Wisconsin's Framework for Equitable Multi-Level Systems of Supports includes eleven key system features with equity being at the center. High quality instruction, strategic use of data, collaboration, strong universal level of support and a continuum of supports are central to this vision for Wisconsin's students.

Response to Intervention

High Quality Instruction - Balanced Assessment - Collaboration

$ Local and State Funds

$ ESEA Funds
Title I
Title II
Title III

$ IDEA Funds
CEIS
Title I Set-Aside

Integration of supports for learners include developmental, academic, behavioral and mental health needs that lead to improved student outcomes, especially for students with IEPs and students of color. In equitable multi-level systems of support (MLSS), districts and schools provide equitable services, practices, and resources to every learner and responsively adjust the intensity and nature of the supports to match learner needs based on data. These key system features inform and impact each other.

It often takes multiple funding sources to support an LEA's multi-level systems of support. CEIS is a funding source available under the IDEA formula grants. CEIS funds may be used for certain aspects of developing or sustaining your multi-level systems of support. Because the allowable costs using CEIS funds are very limited, per the regulations, there is an expectation that an LEA has a robust MLSS system in place and CEIS funds are only used to supplement pieces of that established system.

Limitations on CEIS Set-Aside Amounts

The IDEA regulations cap the amount that can be set-aside under CEIS to no more than 15% of an LEA's
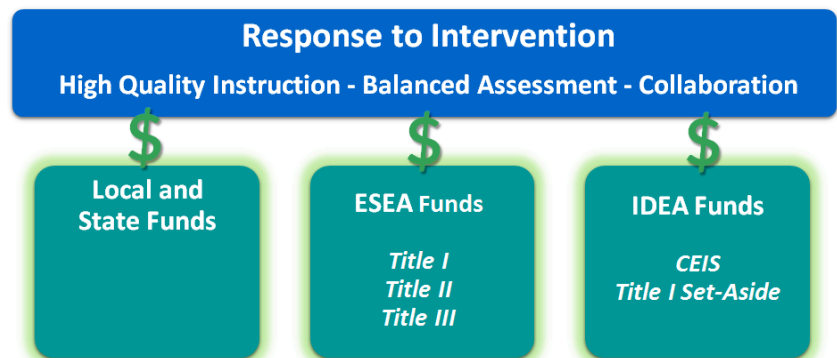
Part B formula allocation. Most LEAs have the option of reserving up to 15% of their IDEA allocation in any given fiscal year for CEIS. An LEA that has an IDEA Part B allocation of $100,000 (which includes both preschool and flow-through funds), may set-aside and expend up to $15,000 dollars of its IDEA funds on academic and behavioral intervention-related activities (34 CFR §300.226).

Under IDEA, there are some LEAs that are required to set-aside and expend 15% of their IDEA Part B allocation on Comprehensive Coordinated Early Intervening Services (CCEIS) funded activities (34 CFR §300.646(b)(2)). These LEAs have been identified by DPI as having **significant disproportionality**, based on race or discipline rates, in special education.

Under the regulations, CEIS set-aside funding is not to be spent on students with disabilities. This does not mean students with disabilities would be excluded from receiving academic or behavioral interventions in an LEA's established Multi-Level System of Supports. It means students with disabilities are not to be counted as receiving services through this particular funding source.

The academic and behavioral interventions that are funded by CEIS are not to be random or drop-in. Students who receive these interventions have been pre-identified as needing additional academic and behavioral supports to succeed in general education.

The CEIS set-aside funds can be used for academic and behavioral interventions for students enrolled in Kindergarten through grade 12, with an emphasis on the early grades. Although the CEIS set-aside calculation is partially dependent on the LEA's preschool allocation amount, (which supports children ages 3 to 5), as well as the flow-through allocation – the current regulations are clear that CEIS funds cannot be used to support preschool age children.

Funding Equitable Multi-Level Systems of Support with CEIS Set-Aside Funds

An LEA must have a coordinated system for identifying students at-risk for failing the general curriculum. The following are general descriptions of the MLSS components and which of these pieces can be funded with CEIS set-aside.

Universal Screening: Identifying students at-risk for failure

Universal screening is how an LEA identifies those students who are at risk for failure. All students would participate in universal screenings that analyze academics and behavior. Again, interventions funded with CEIS set-aside are not provided to students on a random basis – there needs to be an established system for determining which students are in need of additional services and supports.

The US Department of Education believes that universal screening is a responsibility of all LEAs and that regardless of federal funding, all LEAs should be doing universal screening to determine which students are at risk for failing the general curriculum. Based on that philosophy, CEIS set-aside funds may not be used to pay for universal screening – which may include staff time, software programs, training, etc. – because the LEA should already have it in place as part of their multi-level systems of support.

> **The costs associated with universal screening activities cannot be funded with CEIS set-aside**

Interventions: Providing identified students with academic and/or behavioral supports

Once students have been identified as being at risk for failing the general curriculum, they should be provided with additional academic or behavioral supports, depending on the information gathered through the universal screening process.

These additional academic or behavioral supports are often referred to as "interventions." Interventions are above and beyond what is provided in the core curriculum. If a student is failing the core curriculum, CEIS set-aside funds can be used to provide the student with instruction that is in addition to what the student also receives through core curriculum instruction – interventions never replace the student's receiving of core curriculum instruction.

The staff who conduct the interventions must be qualified and appropriately licensed for the services they are providing. A reading teacher can provide additional reading instruction to students identified as being at-risk of failing the core reading program because they are licensed in Wisconsin to provide this instruction.   Or, in another example, a school psychologist can provide behavioral interventions to a student who is at-risk of failing due to classroom disruptions because they are licensed in Wisconsin to perform these duties.

CEIS set-aside funds could not be used to pay for a guidance counselor who develops and delivers the additional reading instruction in the previous example if they do not hold a license for reading instruction.

Special education instructional staff who only hold a special education license cannot be funded with CEIS because licensing standards in Wisconsin precludes a special education teacher from providing instruction to students who have not been identified as students with a disability. So, along with the examples shared, a special education teacher cannot provide additional reading instruction to students without disabilities and thus cannot be funded with CEIS.

> **The costs associated with intervention activities can be funded with CEIS set-aside**

Progress Monitoring: Monitoring the identified students' response to the interventions and using the student data to make educational decisions

While the identified students are receiving the additional services and supports, data must be collected to determine whether or not the interventions are having an impact on their performance. This process is often referred to as "progress monitoring" and is conducted on a frequent basis. The data collected is then analyzed to make decisions about the student's needs – those needs may include a different type of intervention, additional time with an intervention, or not needing the intervention anymore because the student can access grade level standards in an inclusive environment without supports. This acceleration of learning can close learning gaps for students and is informed through team collaboration and strategic use of data.

Progress monitoring is part and parcel with providing interventions – there should not be one without the

other – and so progress monitoring activities are fundable with CEIS set-aside.

> **The costs associated with progress monitoring activities can be funded with CEIS set-aside**

Professional Development: Ensuring staff implementing these activities are provided sufficient training.

Throughout this process, the staff involved need to be appropriately trained in the materials. The staff need to know how to administer the screening, how to effectively provide the intervention curriculum, and how to administer and analyze the progress monitoring data. CEIS funds may be used to pay for the training around the intervention and progress monitoring materials.

Identifying which pieces of an MLSS system can be funded with CEIS set-aside

Since CEIS funded activities can only be provided to students identified as needing additional support, an LEA must have established some system of universal screening prior to submitting a request to use CEIS set-aside funds.

A screening method may include general education teachers administering a math screener in the sixth grade. All students would be screened with the expectation that all students are at a certain predetermined benchmark. Those students who are not at the benchmark would be identified as being at-risk for failing mathematics. In this example, 60 sixth grade students were screened and 12 were identified as being at risk. This screening – the teacher's time, the testing materials, the data analysis to determine which students are at risk – none of these activities can be funded with CEIS set-aside; however, it is a necessary step to the intervention piece.

Universal Screening

General education classroom teachers administer Brand X Math Screener in 6th grade and record results.

All students screened (60), 12 students are identified.

No CEIS Funds

Interventions

The identified 12 students receive after school math tutoring from the mathematics teacher.

Can use CEIS funds

The 12 students identified as being at risk for failing mathematics will receive after school math tutoring from the mathematics teacher. The teacher is appropriately licensed in the subject matter being taught. The tutoring is not a drop-in opportunity for all students, but rather a session that is designed and held specifically for these 12 students. This after-school tutoring can be funded with CEIS dollars.

Twice a week, the 12 students will be given mini-assessments to determine whether or not the after school math tutoring is having an impact on their achievement.

The data from these assessments will drive the services provided to the students

– some students may need extra intervention sessions, or a different type of instructional method, while some of the students only needed a few tutoring sessions and are no longer required to do the after school tutoring because they have caught up to established benchmarks. CEIS funds may support these activities.

CEIS funds may be used to pay for the training around the intervention and progress monitoring materials.

Allowable Costs using CEIS Set-Aside Funds

Just as there are limited pieces of an equitable MLSS that can be funded with CEIS, there are also limitations on how the funding can be used.

The following is a short list of CEIS allowable costs:

- General education teachers and substitute teachers
- School Psychologists, Social Workers, Guidance Counselors, School Nurses
- MLSS Coordinator or School Climate Coordinator
- Coaches for Staff, Mentors, Tutors / Aides

Staff salaries can be funded with CEIS as long as they are supporting allowable activities and are appropriately licensed. If the LEA is utilizing tutors or aides to support the delivery of the interventions, then they have to ensure that these individuals are under the supervision of an appropriately licensed teacher.

Other than staff, CEIS funds may be used for purchased services such as aides, tutors and coaches that are supporting the implementation and delivery of academic or behavioral interventions.

CEIS funds may be used for professional development that directly support activities that can be funded with CEIS. For example, universal screening is a necessary piece in an equitable multi-level system of supports, however, it is not an activity that may be funded with CEIS dollars, so training on how to administer and analyze universal screening data would not be a CEIS-fundable activity.

CEIS funds may also be used for general supplies and instructional materials and media related to the provision of academic or behavioral interventions.

CEIS funds may also be used to purchase computers, laptops, touch screen devices, DVD players, camcorders, etc., if the devices will be used primarily for the delivery of academic or behavioral interventions in an established response to intervention system. The LEA must track these devices and

ensure that their usage aligns with the LEA's activities as reported in the CEIS narrative.

And lastly, nominal items of low value used for student incentives may be purchased with CEIS funds if used as part of the coordinated delivery of academic or behavioral interventions. The items should be educational in nature. The amount charged to the CEIS set-aside grant must be reasonable and prudent. The following are not allowed incentives: cash, cash cards, gift cards, and computing devices (such as iPads, Nooks, Kindles, etc.) Although student incentives can be very helpful, the focus of CEIS set-aside funds should be on the costs of delivering the academic or behavioral interventions.

A full list of allowable costs are available on the CEIS Allowables document.

Mandatory Reporting Requirements

If an LEA uses CEIS set-aside funds, then the LEA must report throughout the year the individual students that received interventions funded in whole or in part with CEIS funds. This is done through the LEA's student data reporting system. Once the data is entered into the LEA's student data system, the information is pushed to DPI's WISEdata system and becomes part of WISEdash. In Wisconsin, there is no standard student information system for LEAs. LEAs must work with their student information system vendor to determine how this is reported within each individual reporting portal.

After the close of each year, DPI has to send the amount of funds expended on CEIS activities and the number of students impacted by the use of these set-aside funds to the US Department of Education. Besides sending in the number of students impacted with that year's set-aside, DPI must also report on whether any past students were eventually referred and found eligible for special education services during the two year period after receiving the CEIS-funded interventions. This data then becomes public at the national level.

Voluntary CEIS Set-Aside Application Process

IDEA flow-through and preschool formula grant applications (assurance, budgets, and claims) are submitted through DPI's WISEgrants Federal Grants web portal.

All LEAs are eligible to set aside IDEA flow-through funds for CEIS funded activities.

Prior to budgeting, the amount of CEIS funds requested needs to be reserved on the Plan Reservations page. The funds need to be reserved prior to budgeting because the amount is "set aside" from an LEA's flow-through funds. Once reserved, the
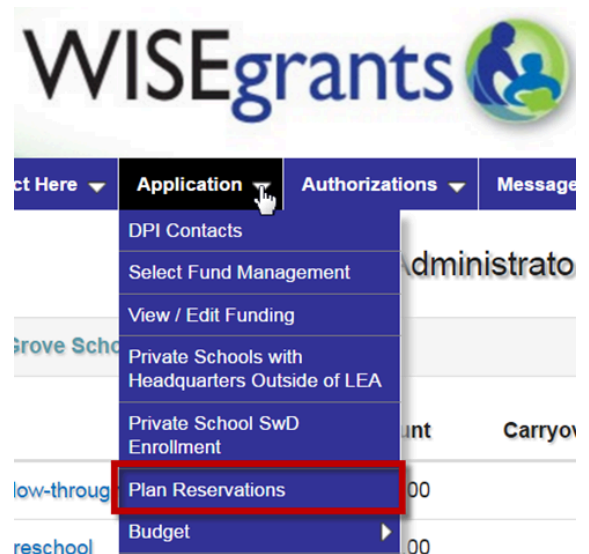
funds will not be available for budgeting within the regular flow-through budget.

Step 1 - Enter the CEIS Set-Aside Reservation Amount

This is a view of the CEIS panel on the Plan Reservations page. The top two rows identify whether or not the LEA was found to be significantly disproportionate. If found significantly disproportionate in the current fiscal year, the LEA is required to set-aside 15% of its IDEA Part B funds. The software will reserve this amount automatically. If the LEA was required to set-aside funds in the prior fiscal year and the set-aside was not fully claimed, then the LEA is required to spend the CEIS carryover amount in the next fiscal year. Again, in this situation, the software will automatically reserve carryover set-aside funds if required.

For all other LEAs, the set-aside is optional. The third row displays the calculation, highlighted, which is 15% of the LEA's flow-through and preschool allocations combined. The LEA can reserve up to the maximum amount allowed. If the LEA reserved CEIS funds in the prior fiscal year but did not claim all of it, they may utilize the unspent funds in the current fiscal year. LEAs can enter a preliminary CEIS carryover amount in the View / Edit funding section of the application. Final CEIS carryover will be loaded into the software by DPI in October. In all situations in which the LEA is not significantly disproportionate, usage of CEIS set-aside or CEIS carryover is optional. There is no need to reserve any funds under this section if the LEA is not planning on entering a CEIS budget.

Although the planned reservations screen is completed prior to entering a flow-through or preschool budget, the LEA has the option of reserving funds under this set-aside at any time during the year. However, it is best practice to reserve the funds and submit a budget application prior to obligating any funds to ensure that the requested activities are approved.

Along the right-hand side of the screen, the Plan Reservations page has a side bar available so the user can track the amounts set aside for Title I Schoolwide and CEIS in relation to the amount of flow-through funds available when planning the budget.

CEIS set-aside funds are not funds in addition to the LEA's flow-through grant amount. Funds budgeted for CEIS are no longer available for regular flow-through. Actions taken by the LEA on the Plan Reservations page drive the amount available for regular flow-through. The amount available for the regular flow-through budget is not based on the amounts budgeted within the set-asides.

Step 2 - Enter the CEIS Set-Aside Budget
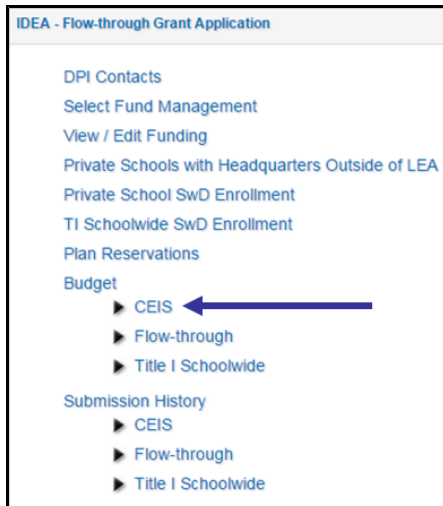
Once an amount has been reserved for CEIS and saved on the Plan Reservations page, the user can enter a CEIS budget. These activities are budgeted and claimed separately from the flow-through budget.

The CEIS budget is set up like all other budgets within WISEgrants. There are budget sections and drop down menu items that contain allowable costs under this set-aside. The main difference between the CEIS budget and the regular flow-through budget is that each budget item includes an "activity" choice. The activities are interventions geared towards reading, mathematics, or behavior. Each budget item has an activity because this drives the questions in the CEIS narrative.

One of the goals of the CEIS narrative is to help the LEA determine which students will be reported as having received services funded with CEIS set-aside dollars.

Step 3 - Complete the required CEIS narrative

The narrative is set up as another section of the budget.

Each CEIS budget requires a narrative to be completed. The narrative is based on the activity types that were chosen for each of the budget items. The questions in the narrative cover grade focus, projected number of students, and the intervention activities. The budget cannot be submitted until answers have been provided for all of the questions under each activity type.

Over the years, we have tackled the issue on which students should be counted as having received services funded with CEIS. As an example, the LEA hires a reading specialist to provide reading interventions to students who are determined to be struggling in reading. The cost of the specialist is $90,000. The LEA's max set aside for CEIS is $45,000. Only a portion of the reading specialist salary can be covered by the CEIS set-aside, so should the LEA only report a portion of the students served by the teacher? Or should the LEA report all students who receive any type of service by the teacher? The hope is that by answering the narrative questions, the LEA can narrow the focus of which students were impacted by the use of CEIS funds.

To address these concerns, our narrative and guidance have evolved so the first three questions ask for the grades that will be directly impacted by the expenditure, the projected number of students served, and the process the LEA has in place to ensure accuracy of reporting students who have received services funded by CEIS.

Activities to support the provision of Behavioral Interventions ▲

The LEA has budgeted for the following expenditures under this activity:

Personnel:

Position Label	Area Label	Position Activity	Salary	Benefits
Teacher	Academic Support- Teachers	Instructional Coach for Staff	$41,000.00	$25,300.00

All Other Sections:

Purchase Item	Purchase Item Detail	Amount
Supplies	General Supplies	$273.00

At the top of each activity section, the LEA can see which items were budgeted for a particular activity.

Question	Answer
1. Identify the grades that will be directly affected by the use of CEIS funds under this activity (Behavioral Interventions)	K-5
2. What is the projected number of students who will receive interventions funded with CEIS under this activity?	25

The LEA identifies that an estimated 25 students in Kindergarten through grade 5 will be impacted through the use of behavioral interventions.

The guidance we can provide regarding reporting students is not based on a strict dollar for dollar CEIS spending, but on the focus of the interventions and the grades impacted. We want LEAs to identify the grades in which the interventions are actually going to be provided. How that could change in this example is if the Behavioral Specialist was going to be housed in a single elementary school, but the behavioral interventions were really only going to happen with students enrolled in grades 3 through 5. The work of the Behavioral Specialist might have an impact on Kindergarten through grade 5 with coaching and implementing universal supports (which is fine because the person is only partially funded with CEIS), but if the actual above and beyond core behavioral interventions are only going to be provided in the higher grades, the LEA should identify those as the grades directly impacted and only report students served in those grades.

What we have run into in the past is the LEA projecting to serve 200 students because the Behavioral Specialist was going to work with the entire school on positive behavioral supports, and part of their salary was paid for with CEIS. The LEA needs to keep the focus on the actual impact of CEIS regarding the provision of interventions and progress monitoring.

The other piece we have all struggled with and continue to work towards improving is the communication within the LEA regarding the reporting of students who were impacted by the use of CEIS funds. Often there has been a disconnect between the program area implementing Multi-Level Systems of Supports, using CEIS funds, and the transferring of that information to the individuals in the LEA who are submitting individual student data to DPI's data collection system. Now as part of our narrative, we require the LEA to explain how that sharing of reliable and accurate data will be handled:

Question	Answer
3. Describe how students who will receive interventions funded by CEIS will be tracked and how this information will be accurately reported in the LEA's Student Information System.	The students daily progress will be monitored and results entered into and tracked via the Educlimber software. The names of students who receive behavioral interventions provided by the Behavioral Specialist will be given to our WISEdata Coordinator quarterly. This information will then be logged into Skyward by the Coordinator.

Students who are only screened but do not actually receive academic or behavioral interventions should not get flagged as having received CEIS funded services in the LEA's Student Information System. Also, this narrative question is not asking how the student's progress will be monitored, but the LEA's process for ensuring that the student is identified in the LEA's Student Information System correctly.

Within WISEgrants, the LEA will be able to see the number of students identified within their student information systems as having received services funded by CEIS. This information should be cross checked with the narrative throughout the year. If the number of students for this activity is showing up in

WISEdash as 200 and the narrative estimated 25 students impacted, the LEA should be checking with their Student Information System personnel to determine why the number of students identified is so much greater than the projection. This is very important because the number of students submitted to WISEdash is the number DPI submits to the US Department of Education. If the amount reserved for CEIS is $5,000 and the LEA reports 200 students being impacted, it does not accurately reflect the true return on the federal investment.

In the response, the LEA should identify:

- Which position will be responsible for identifying the students without disabilities who received services funded with CEIS dollars.
- Which position updates the student profile within the LEA's student information system by entering the start date of CEIS funded services.
- The frequency in which the data will be updated in the LEA's student information system.
- The positions that will be verifying that the number of students identified as being served with CEIS dollars in WISEgrants matches the number in the LEA's student information system.

Please note that CEIS claims cannot be made until at least one student has been recorded in WISEdash. In addition, it is important to exit the students from the CEIS funded program at the end of the school year. Some student information systems automatically carry over students into the next school year as receiving CEIS funded services if there is no end date of services entered into their record.

Question	Answer
4. Although CEIS funds cannot be used for universal screening, the LEA must have a process in place to identify the students who are struggling in order to provide them with services funded by CEIS. How will students be universally screened to determine if they need additional supports under this activity?	Student behavioral progress will be monitored through daily office discipline referrals. Students who receive three or more major incident referrals will be targeted for tier 2 or 3 behavior intervention support.

Under the current regulations, CEIS funds may only be spent on the steps past universal screening. However, the narrative asks LEAs to explain their universal screening process. If the LEA responds that one is being researched or developed, then DPI staff know that the LEA is not ready to utilize CEIS funds appropriately. CEIS funds need to be used for academic or behavioral interventions above and beyond the core curriculum. Unless the LEA has a system in place to identify struggling students, then there are no eligible CEIS expenditures because there would not be any students in which to provide services.

In addition, the LEA should be sure that the response to the universal screening question is specific to the activity type chosen for the expenditure.

Question	Answer
5. What interventions, under this activity, will be provided directly to students identified in question #4? Interventions must be provided 'above and beyond' the core curriculum received by all students. In the response, connect any specific expenditures funded with CEIS tied directly to the provision of interventions.	Each student identified through the universal screening as struggling behaviorally will have a behavior intervention plan developed and implemented by the Behavioral Specialist. These students may also participate in individual social skills/behavioral lessons and/or small SAIG groups.

Under Interventions, DPI will check to make sure the interventions are "above and beyond" the core curriculum and not activities such as credit recovery or differentiated instruction. In our guidance, we tie the interventions described here to the grades identified as being impacted and provide direction that these are the students who get reported to the SEA as having received services funded by CEIS. This question has also helped us decrease the number of LEAs who use the funds for professional development but do not actually provide any services to students. Remember – if the LEA claims funds, then the funds need to be tied back to interventions provided to students, even if all of the CEIS funds set-aside are only paying for professional development.

Beginning with this question, and the several following, the LEA needs to explain how the expenditure is directly related to the activity. In this example, the LEA clearly states the CEIS funded Behavioral Specialist is developing and implementing individualized behavior intervention plans. If there was a social worker also being funded by CEIS and linked to a behavior activity, the issue would be that in this response the LEA does not explain how the social worker fits into the provision of behavioral interventions, only referring to the behavioral specialist. The LEA needs to be sure it addresses how each of the CEIS expenditures support the delivery of services.

Question	Answer
6. What progress monitoring measures will be used to monitor students' response to the interventions provided under this activity? In the response, connect any specific expenditures funded with CEIS tied directly to the provision of progress monitoring.	Daily office discipline referrals will be monitored through Educlimber.
7. How frequently is a student monitored during the delivery of this particular academic or behavioral intervention(s)?	Daily
8. How will results from progress monitoring be used to make decisions about a student's continued participation?	Once students reach their goal of achieving 80% or better on their behavior intervention plan for 4 consecutive weeks, students will gradually fade from their behavior intervention plan.

To round out the CEIS narrative questions, the LEA must describe how the academic or behavioral interventions will be monitored. In the review, DPI is not approving any specific instructional practice or progress monitoring system. Instead, DPI is checking to make sure that the LEA is using the funds in accordance with the IDEA regulations.

Progress monitoring is an essential element of data-based decision making. Unlike the "universal screening" of all students, progress monitoring refers to the frequent monitoring of students during the time they are receiving academic or behavioral interventions. A student receiving academic or behavioral interventions must have their progress monitored more than once or twice a year. DPI will check this response to ensure that LEAs understand what is meant by progress monitoring because this ties back into which students are being counted as having received CEIS funded services. If the student is not part of a progress monitoring system, then the chances are the student is not actually receiving academic or behavioral interventions, and thus should not be counted as having received services funded by CEIS.

There is no need to write lengthy answers, but there is a need to separate out answers by activity so that both the LEA and DPI can determine which students should be counted.

CEIS and WISEdash

WISEgrants will house a report that displays the LEA's CEIS student count, which is pulled from DPI's WISEdash system. If the LEA has yet to identify any students within their own student information system and attempts to submit a claim for CEIS funds, the software will generate a message informing LEAs that students need to be identified before any CEIS funds can be claimed. The concept being that if the LEA is claiming CEIS funds, then the expenditures have occurred and services have been provided to students. Until the software pulls in a number from WISEdash, the LEA will not be allowed to submit any claims against the CEIS set-aside.

The "**CEIS Student Count**" report can be found on the IDEA Flow-through Application menu, under Reports:

CEIS / CCEIS Student Count Report

CEIS Amount Budgeted	CEIS Amount Claimed	Total Count Reported by LEA
$37,946.00	$19,022.68	84

Verifying CEIS Student Counts

It is the responsibility of the LEA to ensure that students identified as receiving CEIS-funded services are consistent with the IDEA regulations and the LEA's approved CEIS narrative. The WISEgrants CEIS Student Count report provides the user with an aggregate number of students identified within the LEA's student information system as having received CEIS-funded services:

CEIS / CCEIS Student Count Report

CEIS Amount Budgeted	CEIS Amount Claimed	Total Count Reported by LEA	Students < KG	SwD	Valid CEIS Student Count
$100,000.00	$41,583.29	265	1	26	238

⚠ The LEA has flagged students in grades lower than Kindergarten as receiving services funded by CEIS; however, voluntary CEIS funds may only be used for students without disabilities in Kindergarten through grade 12. This data will need to be resolved by removing the CEIS Program Association type for these students in WISEdash. See the technical assistance on CEIS and WISEdash for more information.

⚠ The LEA has flagged students with disabilities as receiving services funded by CEIS; however, voluntary CEIS funds may only be used for students without disabilities in Kindergarten through grade 12. This data will need to be resolved by removing the CEIS Program Association type for these students in WISEdash. See the technical assistance on CEIS and WISEdash for more information.

Individuals with access to both the LEA's WISEgrants and WISEdash portals should verify on a regular basis that the number displayed in the CEIS Student Count report reflects a valid count.

There are three things that should be checked:

1) Is the amount spent per student reasonable?
   - In the above example, the amount claimed and the number of students served is equal to a per capita amount of $156. Any per capita amount between $750 to $2,000 is reasonable. When the per capita amount is outside of that range, the LEA should verify whether students are being correctly identified within the LEA's student information system.

2) Are the students identified as receiving CEIS-funded services within the grade range allowed under IDEA regulations?
   - The count must be "0" in the column "Students < KG." Students who are not enrolled in Kindergarten for that fiscal year need to have the program association of "Coordinated Early Intervening Services" unflagged on their student record.

3) Are the students identified as receiving CEIS-funded services students without disabilities?
   - The count must be "0" in the column "SwD." If the count is greater than 0, the student record in the LEA's student information system **must** be updated and the program association of coordinated early intervening services removed.

Failure to fix data errors lead to claims for all IDEA funds being held.

### Resolving CEIS Student Count Issues
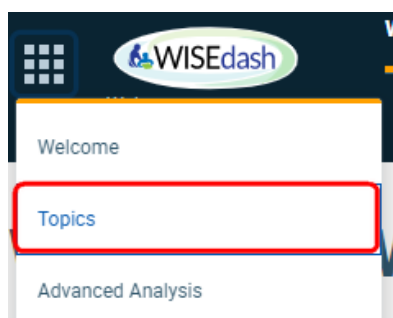
The user can see a list of the students who have been flagged in the LEA's student information system as having received CEIS or CCEIS services through WISEdash. From the *WISEdash for Districts* menu cube, select "Topics."

Next, select "Programs by Subgroup" under the "Programs" menu:
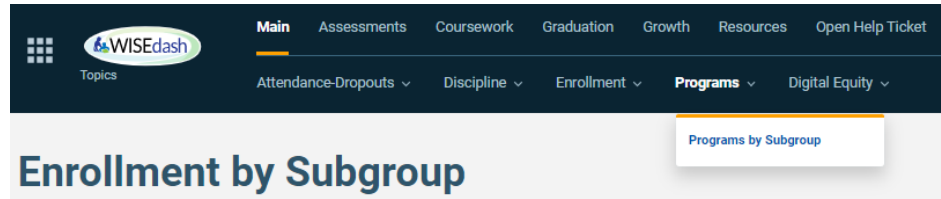
Make sure you are in the correct year. A bar graph will appear, which includes counts for Coordinated Early Intervening Services, English Learners and Section 504 Placements (if there are no applicable counts for a topic area, the topic will not be listed). By clicking on the bar for Coordinated Early Intervening Services, the user will open a window that lists all students flagged with the program association of Coordinated Early Intervening Services in their student information system.
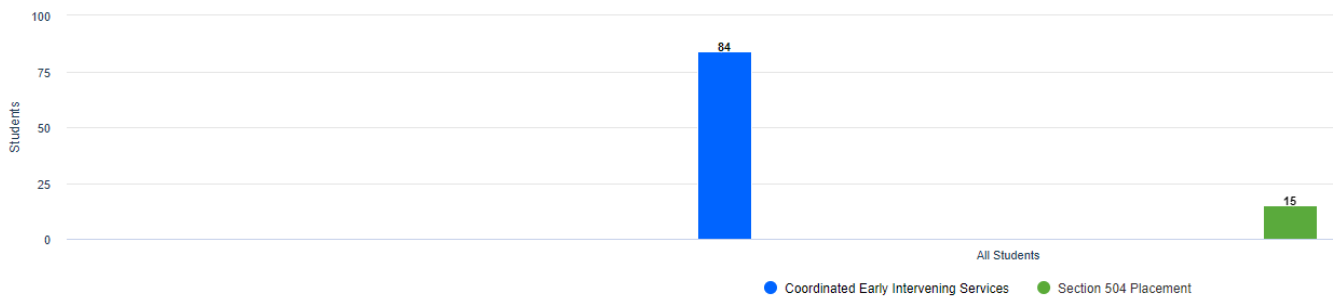
Each night, WISEgrants caches the CEIS student count data submitted to WISEdata/WISEdash (for faster processing times during the day). If the LEA pushes updated information to WISEdata on Monday, the results will be displayed in WISEgrants on Tuesday. If this does not occur, please review WISEdata to verify that data was pushed correctly. CEIS student counts are currently labeled "Cocurricular Programs" under the WISEdata Portal program section of "Data Last Received":

Accounting for CEIS Expenditures

Fund 10; Project Code 341; Revenue Source 730

Special education costs are normally coded to fund 27, so the majority of costs that would be charged to the IDEA formula grants will have a code of fund 27 and a project code of either 341 for flow-through or 347 for preschool.

Because CEIS funds are for non-special education activities, the LEA should code these costs to fund 10 but keep the project code of 341, which identifies it as a cost that was charged to the IDEA flow-through grant for that fiscal year.

Supplement / Not Supplant Provisions

In general, the federal "Supplement / Not Supplant" provision is the requirement that a subrecipient does not use federal funds for a cost that was previously funded with local dollars. The normal rule of thumb, though, is that an LEA can replace federal funds with federal funds – so if one federal funding source runs out, and if a different federal funding source is applicable to the direct costs of the activity, then the funds can be replaced.

However, the IDEA regulations specifically state that CEIS funds may be used to supplement but not supplant services funded by and carried out under any federally funded project, which would most likely be the Elementary and Secondary Education Act (ESEA) which includes Title I services (34 CFR § 300.226(e)). So, if the LEA is meeting the requirement of IDEA's maintenance of effort, it may use CEIS funds to pay for a reading interventionist that was funded the prior year with local dollars. However, this same LEA may not use CEIS funds to pay for a reading interventionist that was funded the prior year with Title I dollars. The LEA may add on to the federally funded services, but may not replace.

Title I Schoolwide Set-Aside and CEIS Set-Aside

A separate, but even more flexible, set-aside option that is available under IDEA for LEAs is the Title I Schoolwide set-aside. This is an option that is available only to LEAs that have Title I schoolwide schools and the funds set-aside may only be spent at the school level – unlike CEIS, which can fund activities that span the district.

Title I Schoolwide set-aside funds can be used to pay for any activity at the Title I schoolwide school that supports the schoolwide plan. There are no restrictions on how these funds can be used as there is under CEIS – Title I schoolwide school set-aside funds can be used for universal screening, differentiated curriculum delivery, universal design learning practices – all costs not allowed when using CEIS.

However, the regulations do state that if the LEA wishes to use Title I schoolwide and CEIS, that the amount spent at the school using IDEA funds must be capped at the maximum amount that could be set

aside under Title I schoolwide. Basically, an LEA cannot use the max set-aside amount under the Title I set-aside at an elementary school and then add an additional 15% of its IDEA allocation to the same school under CEIS. In those cases, the LEA would be better using the Title I schoolwide set-aside and not using a combination of that and CEIS.

Instead, the LEA could option to use Title I schoolwide set-aside at its Title I schoolwide elementary school and then use CEIS set-aside at its high school, which is not a Title I schoolwide school. The rules for allowable costs are different depending on the set-aside, but this would allow the LEA to use IDEA set-aside funds for pieces of its multi-levels systems of support at different locations.

Equitable Multi-Level Systems of Support and Students with Disabilities

These different systems need to integrate and overlap, but sometimes there is a tendency to want to keep the programs separate. Because the IDEA regulations state that CEIS funded activities may only be provided to students without disabilities, there is sometimes confusion that academic and behavioral interventions in general cannot be provided to students with disabilities. This is not true – Multi-Level Systems of Support (MLSS) are designed for all students, whereas CEIS is a funding source with a requirement that activities are intended for students without disabilities.

And, MLSS activities, including those activities funded with CEIS or Title I schoolwide set-aside dollars, cannot waylay a special education evaluation. Under Wisconsin state law, if a referral is made for special education services, the evaluation process must begin under established timelines, regardless of whether or not a student is receiving interventions as part of an equitable MLSS or interventions that are funded with CEIS funds. However, LEAs may use data collected during the interventions for the purposes of specific learning disability determinations.