

>> Cindy Schneider: Welcome to today's CPM session on Title IV, Safe and Drug-Free Schools and Communities, and Tobacco Use Prevention Education, also known as TUPE. The Safe and Healthy Kids Program Office here at the Department of Education administers Title IV and TUPE.

I am Cindy Schneider and this is John Lagomarsino; we are consultants in the Safe and Healthy Kids Program Office.

>> John Lagomarsino: The presentation objectives today are to, one, increase your knowledge and understanding of Title IV and TUPE program requirements.

And two, become better prepared for your CPM visit.

Briefly, let me begin by bringing to your attention the primary goal of Title IV and TUPE.

The goal is to create a safe, disciplined and drug-free learning environment that helps all children meet challenging academic standards while closing the achievement gap.

The CPM requirements are based on laws and regulations written to meet this goal.

>> Cindy Schneider: There are three CPM documents that pertain to Title IV and TUPE. Two of the three are used during your CPM visit, the CPM instrument for S&DATE and the cross-program instrument.

The third document, the OPSET, has been developed to assist you in preparing for your CPM visit.

S&DATE, by the way, is the acronym used in the CPM instrument in the Title IV and TUPE.

It stands for Safety, Drugs, Alcohol, and Tobacco Education.

I'm going to briefly review each of the documents and explain how they are used.

The CPM instrument, which is the tool used by the CPM reviewer, contain 17 items for S&DATE, all of which are based on law.

The OPSET, which stands for Ongoing Program, Self-Evaluation Tool, was developed as a tool for LEAs to use in preparing for a CPM review.

It includes a list of resources available should you want additional information about each of the S&DATE items.

Lastly, in recognition that many legal requirements apply to more than one categorical program, CDE created the cross-program instrument.

CPM reviewers representing different programs sometimes monitor the same requirement, but for separate programs.

If a finding is made, the specific program or programs are referenced.

Each part, cross-program item has a list of programs for which the item applies.

S&DATE will be listed only on cross-program items that apply to S&DATE, not all apply.

Today, during this presentation, we will be focusing on the S&DATE items included in the CPM instrument.

>> John Lagomarsino: Beginning with Dimension I involvement, No Child Left Behind legislation emphasizes the development of programs and consultation with stakeholders. Stakeholders include students, parents, school staff and community members. The focus of S&DATE Item 1 is on consultation.

The LEA is required to prove consultation has occurred regarding the design, development, and administration of the program or activity.

Consultation should include teachers, parents, students, community organizations, and school administrators.

It should be done in the initial stages of program planning, or at the minimum, annually. However, we would hope this would occur on a more frequent basis.

Lastly, the principles of effectiveness should be used in the process of developing and implementing the program.

In addition, the principles of effectiveness are of key importance in the evaluation of your Title IV and TUPE programs.

>> Cindy Schneider: John, you stated that consultation is required for S&DATE Item. How would an LEA demonstrate they have consulted in developing and implementing their program?

>> John Lagomarsino: An LEA must provide written documentation that consultation has occurred, with whom, when and about what.

Maintaining agendas, assignment sheets, and meeting minutes when S&DATE is discussed are examples of such documentation.

>> Cindy Schneider: As we move on to S&DATE Item 2, we see that it continues with the team of consultation.

Consultation is to occur regarding the application.

The application referred to here is both the consolidated application or CONAP, and the Goal 4 of the LEA plan.

The LEA is required to prove that the CONAP and LEA plan were developed in a consultative manner.

To satisfy this requirement, many districts form Title IV health and safety committees which serve as a consultative party.

Additionally, with S&DATE 2, we look at whether or not private schools were consulted. Title IV-funded services must be made available to private schools serving students in the public school attendance area.

To meet this requirement, districts often send a letter at the beginning of the school year to private school principals, inviting them to participate in No Child Left Behind-funded programs.

CPM reviewers will confirm private schools have been contacted and have responded as to whether or not they are interested in participating.

>> John Lagomarsino: So, Cindy, what are the specific tasks LEAs must do to meet the requirements for S&DATE 2?

>> Cindy Schneider: The LEA must be able to demonstrate that consultation has occurred regarding the CONAP in Goal 4 of the LEA plan.

CPM reviewers will confirm private schools have been contacted and included in the planning of the Title IV program, if they chose, and are invited to activities and training related to the program.

If private schools are not interested, that's fine.  
However, they need to be asked and they need to have responded.  
The LEA must have written documentation to show the CPM reviewer that this has been accomplished.

>> John Lagomarsino: S&DATE Item 3, located on page 3 in your CPM instrument is the first item within Dimension II.  
Dimension II focuses on policies and plans, S&DATE 3 concentrates on Goal 4 of the approved LEA plan, Goal 4 specific to Title IV and TUPE.  
The CPM reviewer will confirm that the programs and activities stated in the LEA plan have been implemented.  
Should the LEA want to change programs or add activities, Goal 4 would need to be updated and approved by the school board or reflected in the Safe and Healthy Kids Annual Report.

>> Cindy Schneider: Now, let me clarify for the LEAs.  
The LEA needs to make sure Goal 4 in the LEA plan or the Safe and Healthy Kids Annual Report accurately reflects what programs and activities are being implemented at the site or in the district?

>> John Lagomarsino: Yes, that is correct.

>> Cindy Schneider: Now, looking at S&DATE Item 4, which focuses on School Safety Plans, school safety plans must include school discipline policies, security procedures at, to and from the school, prevention activities that create and maintain safe and drug-free campuses, a Crisis Management Plan, and a Code of Conduct policy for students.

>> John Lagomarsino: So, to meet the requirements for S&DATE 4, must the LEA develop and implement a school safety plan addressing all the five items you just mentioned?

>> Cindy Schneider: Yes, the LEA must.  
All items are to be included in the school safety plan.  
If even one item is missing, the S&DATE requirement is not considered to have been met.

>> John Lagomarsino: Turning that out as a next S&DATE item, Item 5 on page 4 in your CPM instrument, focuses on the required tobacco-free campus policy.  
The tobacco-free campus policy includes four requirements in addition to the policy itself.  
The policy must state that tobacco use is to be prohibited on district property and in district vehicles.  
Information about the tobacco policy must be communicated to students and staff, including the enforcement procedures.

Signs prohibiting tobacco use must be prominently displayed at all entrances to school property, and information must be made available to students and staff about smoking cessation.

Each part must be verified to meet the requirements of this item.

Some of you may be familiar with the TUPE certification process.

These requirements are similar to the requirements for that process.

>> Cindy Schneider: Must the signs contain any particular verbiage?

>> John Lagomarsino: Signs that say “Smoking not allowed” are not sufficient.

A sign must address all types of tobacco use.

Signs stating tobacco use prohibited would satisfy this requirement.

>> Cindy Schneider: John, in regards to communication about the tobacco policy, might this requirement be satisfied by including information in the Parent/Student Handbook, the Staff Handbook, or affidavit signed by employees stating they’re aware of the policy?

>> John Lagomarsino: Yes, and fliers posted in the staff break room and around campus would be an avenue to communicate information about smoking cessation.

LEAs should be sure to make information available to both students and staff.

>> Cindy Schneider: Now, looking at S&DATE 6, the primary requirement for this item is the adoption of a Board-approved policy establishing mandatory expulsion for a possession of a firearm or weapon for not less than one year.

This policy, known as the Gun-Free Schools Act policy must state that the student who brings a firearm or weapon to school will be automatically referred to the Criminal Justice System, for example, Juvenile Justice, the Police or the Sheriff.

There is the option for the governing Board to have flexibility in setting an earlier date for readmission.

However, if the Board exercises this option, they must include the phrase on a case basis.

>> John Lagomarsino: So, Cindy, a Board-approved policy must be adopted requiring no less than one year expulsion for any student who brings or possesses a firearm at school. Is there anything else?

>> Cindy Schneider: Yes, LEAs must refer the student to the Criminal Justice System or the Juvenile Delinquency System.

The CPM reviewer will verify that the policy is in place, and that it contains the required elements as stated in the CPM instrument and OPSET.

>> John Lagomarsino: The next item, S&DATE 7 focuses on the reports required by CDE.

LEAs must submit complete and accurate reports as required.

There are a total of four required reports, the Safe and Healthy Kids Annual Report, which is due on June 30<sup>th</sup>; the Uniform Management Information and Recording System or UMIRS, in Part I of the CONAP.

The Gun-Free Schools Act which is also in Part I of the CONAP, and the California Healthy Kids Survey, which must be administered every two years.

>> Cindy Schneider: What happens if LEAs complete only three of the four required reports?

>> John Lagomarsino: The requirements for S&DATE 7 are not considered as having met if only three of your reports are completed.  
All four must be completed and submitted.

>> Cindy Schneider: Thanks, John.

Moving on to the next item, S&DATE 8, is yet another policy requirement.

This is the Unsafe School Choice Option policy, sometimes referred to as USCO.

Every LEA that receives Title IV funds must have a USCO policy in place regardless of whether or not they are designated as persistently dangerous or have had a student identified as a victim of a violent criminal offense.

They must notify parents, students, and staff of the policy.

The LEA must inform victims of violent criminal offenses that they have the right to attend a safe school.

They must offer the right to transfer to a safe school within the LEA.

They must document the parents or the victim's response to the LEA's offer to transfer.

And all related documentation must be kept on file.

>> John Lagomarsino: If a school is not considered persistently dangerous, are they still required to adopt the USCO policy?

>> Cindy Schneider: Fortunately, to date, there are no schools in the State of California that have been identified as persistently dangerous.

Regardless, this policy is required with all of the elements and included, as listed in the CPM instrument, in OPSET.

Next, we go to Dimension III, which evaluates how funds are used for prevention related activities.

Remember, Title IV and TUPE funds are provided to help schools create safe, disciplined and drug-free environments that support academic achievement.

In Dimension III, we evaluate whether or not this has been achieved.

>> John Lagomarsino: S&DATE 9 is the first item in Dimension III, the focus is on expenditures.

All items paid for with Title IV and TUPE funds must be directly related to the program expenses.

Title IV and TUPE funds can be used to supplement, but cannot supplant existing levels of service or other non-Federal funds.

For example, a Math teacher's salary cannot be paid for using Title IV funds.

>> Cindy Schneider: So, John, what is needed to demonstrate that the requirements for S&DATE 9 have been met?

>> John Lagomarsino: Clear and accurate records should be maintained, showing how Title IV and TUPE funds are used.

The Title IV and TUPE coordinator may need to work with their business office to make sure the records are maintained and that expenses of Title IV and TUPE are accurate. In addition, the business office needs to make sure that Title IV and TUPE funds do not supplant expenses that should be covered by other sources such as the general fund.

>> Cindy Schneider: That makes good business sense.

Have you said that LEAs where the Title IV coordinator has no knowledge or very limited knowledge of their budget?

Now, the other S&DATE item which focuses on budget and expenditures is S&DATE 10.

The section of No Child Left Behind Law that mandates S&DATE Item 10 can be somewhat difficult to understand though.

Simply said, Title IV program funds are designed to assist with the implementation of prevention activities grounded in scientific research.

These funds are not to be used for improvements to the physical plant.

An LEA is limited to using a maximum of 40% of the total entitlement on the five areas listed in the CPM instrument and OPSET.

Some examples include metal detectors, electronic locks, surveillance cameras, reporting of criminal offenses committed on school property, supporting safe zones of passage and hiring a mandatory training school security personnel.

In addition, the LEA can spend no more than half of the 40% on the hiring and mandatory training of school security personnel.

>> John Lagomarsino: Cindy, what must be done to ensure the requirements in S&DATE 10 are satisfied?

>> Cindy Schneider: When determining how Title 4 funding will be spent, referring to the regulation as stated in the CPM instrument or OPSET might be the first place to go. This item may also need to be discussed with the school business office to ensure it is carried out correctly.

The CPM reviewer will want to review the Title 4 budget to confirm how and where Title 4 funds have been spent.

>> John Lagomarsino: Next is Standards Assessment and Accountability Dimension, which is Dimension IV.

All categorical programs, including Title 4 and TUPE must be developed using the assessment of objective data regarding the needs of students served by the programs. This is part of the Principles of Effectiveness that were previously mentioned.

A needs assessment must be conducted, goals must be set and outcomes formed.

>> Cindy Schneider: Turning to S&DATE 11 on page 7 of your CPM instrument, we find another item that pertains to the Principles of Effectiveness.

The Principles of Effectiveness keep coming up because they are such a critical part in developing and implementing a successful program; they apply to this S&DATE item as well as Item 1, 15 and a part of Item 16.

Please take time to become familiar with the Principles of Effectiveness and incorporate them into your program process if you don't already.

>> John Lagomarsino: How can LEA demonstrate that the Principles of Effectiveness are being incorporated and used?

>> Cindy Schneider: One of the best methods to keep records is to keep records; being able to show that a needs assessment such as the California Healthy Kids Survey has been done, that performance measures have been adopted--for example, by completing the Safe and Healthy Kids Annual Report, that an action plan has been developed in consultation with others and that the plan was evaluated.

Sign-in sheets, meeting minutes and agendas may be some of the records you maintain to demonstrate this S&DATE requirement is met.

>> John Lagomarsino: S&DATE Item 12 is next.

The focus of this item is on the requirement that LEAs report suspensions, expulsions and truancy rates to the public on a school-by-school basis.

Many LEAs use their School Accountability Report Card or SARC to report to report suspensions and expulsions.

This is fine.

However, to fully meet this truancy requirement, rates must be included or they can be reported publicly elsewhere.

If the information is reported during a public portion of a school board meeting, LEAs should be sure to keep a copy of the meeting minutes at which these rates are reported. In addition, LEAs must be aware that only reporting to the public via the internet does not satisfy this requirement.

The LEA may want to send out a notice to parents stating the information is available upon request.

S&DATE 12 may sound relatively simple; however, this item is often found to be out-of-compliance.

The key to meeting the requirement is to make sure all three rates are publicly recorded--suspension, expulsion and truancy--and make sure the rates are reported on a school-by-school basis, not by district.

>> Cindy Schneider: Next is Dimension V, which focuses on Staffing and Professional Development.

There are no S&DATE items in this dimension.

Dimension VI, with one S&DATE item, focuses on Opportunity and Equal Educational Access.

This dimension reinforces that all students are eligible and required to share in the services provided by Title 4 and TUPE funding.

>> John Lagomarsino: In looking at the requirements for S&DATE 13, many LEAs say they do not have pregnant minors or have never had any minor parents at any grade levels.

Whether or not pregnant minors or minor parents are present, the LEA must be able to describe how the services listed in the CPM instrument and the OPSET will be made available should a pregnant minor or a minor parent enroll tomorrow.

LEAs need to have researched such services, know where they are available and be able to refer students if needed.

To meet the requirements for S&DATE 13, the LEA must provide documentation that the required services are available through the LEA or community resources.

LEAs are not limited to offering services only at the school site.

Students may be referred out to the community for services.

However, I want to emphasize that the LEA must document that the specific services required in the CPM instrument and OPSET are available through the community services provider.

Documentation such as pamphlets or a list of agencies in the community that offer the required services would not be sufficient to meet the requirements for S&DATE 13.

>> Cindy Schneider: Items in this last dimension, Dimension VII, require the LEA to prove program implementation has occurred and that students are receiving Title 4 and TUPE services that meet their assessed needs.

S&DATE Item 14 is the item we begin with in Dimension VII.

>> John Lagomarsino: S&DATE Item 14 is on page 10 of the CPM instrument.

This item focuses on the program developed and whether or not it is based on scientific research that provides evidence the program reduces violence and illegal drug use.

Implementing programs based on scientific research includes implementing curriculum with fidelity.

Implementing with fidelity means programs should be implemented consistent with the manner in which they were demonstrated to be effective.

This is imperative.

In support of these curriculum guides for all science-based programs, insist upon staff training in order to implement the curriculum with fidelity.

>> Cindy Schneider: To verify that requirements are met for S&DATE Item 14, what must LEAs do?

>> John Lagomarsino: They must ensure that all programs used are based on scientific research, are implemented with fidelity and provide evidence that staff assigned to deliver the curriculum have been trained.

It's suggestive that LEAs document lessons delivered by whom, to whom and when.

In addition, written evidence validating that staff assigned to deliver curriculum have been trained is encouraged.

This might include copies of Certificates of a Completion.

>> Cindy Schneider: For S&DATE Item 15, LEAs must prove that Title 4 funds were used properly.

Program and activities are required to be coordinated with school and community-based services and programs, foster a safe, tobacco-free, alcohol-free and drug-free learning environment supportive of academic achievement and are consistent with the Principles of Effectiveness.

Compliance with this item may include lesson plans and program descriptions, a list of materials purchased or records of staff development training.

>> John Lagomarsino: Cindy, I see the Principles of Effectiveness again mentioned. How can an LEA demonstrate they have incorporated the Principles of Effectiveness?

>> Cindy Schneider: By providing written documentation such as an LEA's written Prevention Program Plan illustrating how Title 4 programs and activities are coordinated with school and community-based services and programs and consistent with the Principles of Effectiveness.

>> John Lagomarsino: Looking now at S&DATE 15, the identification and implementation of a science-based or innovative program that addresses tobacco use is required.

The CPM reviewer will verify the program used for grade levels receiving the curriculum and confirm the staff who will deliver the lessons have been trained on their curriculum being implemented.

>> Cindy Schneider: John, should the teachers keep a log of the dates the lessons were delivered and include which lessons, specifically, and to whom it was taught?

>> John Lagomarsino: Yes, that's a good idea.

In addition, the LEA may want to keep written evidence that staff assigned to teach the lessons have been trained.

Sign-in sheets from the training could be used to demonstrate the requirements for S&DATE 16 have been met.

>> Cindy Schneider: For S&DATE 16.1, the guidelines referred to in this item relate to developing and implementing the LEAs TUPE program utilizing the Principles of Effectiveness.

Here we are again, focusing on the Principles of Effectiveness.

We hope it is evident just how important these principles are as part of your program.

These guidelines are located in the document entitled "Getting Results, Part 2, Chapter 2".

Included are requirements, recommendations and resources based on the document produced by the Centers for Disease Control and Prevention.

LEAs can find a web link to getting results in the Resource section of OPSET at the end of Dimension I.

All documents can be downloaded.

>> John Lagomarsino: Moving on to S&DATE 16.2, this item applies only for LEAs accepting TUPE funds through the CONAP for Grades 4 through 8.

Verification is required for this item showing that the Tobacco Use Prevention Program for these grades addresses the: 1) Undesirable physiological cosmetic social consequences of tobacco use; 2) The reasons adolescents use tobacco; 3) Peer norms and social influences that promote use; and 4) Refusal skills.

During interviews with students, the CPM reviewer may verify that tobacco use prevention lessons were taught, if the lessons are part of a scientifically-based program and if the program is implemented with fidelity.

Meeting this requirement should be no problem.

S&DATE 16.3 applies only for LEAs with TUPE grants for Grades 9 through 12.

Written verification is needed to show that prevention and cessation activities are offered in these grades.

Verification may take many forms but examples of evidence may include fliers advertising quit groups, cessation programs, pamphlets with tobacco use statistics and/or documents about activities such as the Great American Smokeout.

All of these would serve to support compliance with this S&DATE item.

Additionally, sign-in sheets are also recommended if available.

>> Cindy Schneider: S&DATE 17, the last S&DATE item in the CPM instrument applies only if an LEA uses Title 4 funds to implement an innovative or promising prevention program.

Prior approval to use Title 4 funds for this reason is required and this is done through a waiver process.

The LEA must successfully obtain a federal waiver from the State Board of Education to use such a curriculum or other promising prevention program and waived programs must demonstrate a substantial likelihood of success and must currently be under study to prove their likelihood.

Waivers are good for two years.

>> John Lagomarsino: So, Cindy, S&DATE 17 applies only to LEAs using innovative or promising prevention programs, correct?

>> Cindy Schneider: Yes, that is correct.

The LEA must obtain a waiver and be able to provide documentation that the waiver has been submitted and approved by the State Board of Education.

So to wrap up today's presentation, let me say that as painful as it may seem, you can do it.

You can prepare for and successfully complete a CPM review for Title 4 and TUPE.

Remember, there are several resources available to assist you in planning, developing and implementing your programs as well as in being compliant and successful in your CPM review--the CPM instrument and OPSET which are available online, the CDE website which contains this presentation for S&DATE, your County Coordinator and your Regional Consultant in the Safe and Healthy Kids Program office.

We want to emphasize that compliance is not only a requirement during a CPM year; compliance is ongoing and should be maintained before, during and after your onsite visit.

>> John Lagomarsino: We have provided some tips in preparing for the CPM review and, when followed, can assist you in having a successful CPM visit. Don't forget to use the OPSET and remember to ask yourself for each item, "How am I going to prove that what is required has been completed?"

>> Cindy Schneider: One resource we strongly recommend is "Getting Results". It's a document containing a collection of resources to assist LEAs in designing and implementing alcohol, tobacco and other drug prevention programs as well as youth violence prevention programs and youth development. Getting results will assist you in better understanding Title 4 and TUPE program requirements.

It's available to download on the CDE web.

Other resources that will assist you have been mentioned throughout our presentation. These can be found in the Resource section of the OPSET which contains an even longer list of websites including background information to help you understand what is needed to meet the requirements for the seventeen S&DATE items.

>> John Lagomarsino: Before we close, I want to mention that last year, a total of fifty CPM reviews were performed.

The top six items most frequently missed were S&DATE 3 which focuses on the implementation of Title 4 activities and programs consistent with those in the LEA plan, S&DATE 4 with a focus on school safety plans, S&DATE 5 the tobacco-free policy, S&DATE 6 the Board policy on expulsion for the possession of weapons, S&DATE 8 which is the Board policy on unsafe school choice option and S&DATE 15 which looks at Title 4 programs to ensure they are coordinated with community-based services and organization, include the Principles of Effectiveness and foster a safe, tobacco-free, alcohol-free and drug-free learning environment.

>> Cindy Schneider: This concludes our presentation on Title 4 and TUPE.

We would like to thank you for your attention and hope you have found this helpful in preparing for your CPM review.

There will be an opportunity to ask questions shortly.

If you have questions, we encourage you to contact us or refer to the available resources. Again, thank you.