TO: Illinois State Board of Education

FROM: Christopher A. Koch, Ed.D., State Superintendent of Education
Darren Reisberg, General Counsel

Agenda Topic: Action Item: Rules for Adoption – Part 555 (Children’s Mental Health Initiative Grants)

Materials: Recommended Rules

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Purpose of Agenda Item
The purpose of this agenda item is to present proposed new Part 555 for the Board’s adoption.

Expected Outcome of Agenda Item
The Board will be asked to adopt the proposed new rules.

Background Information
The State Board received an appropriation of $3 million in the FY 07 budget for the Children’s Mental Health Partnership. During this year, through close collaboration with the members of that partnership and particularly the Illinois Violence Prevention Authority (IVPA), strategies have been formulated for the involvement of the public schools in initiatives aimed at fostering mental health for students as well as their mastery of the recently adopted Social and Emotional Learning (SEL) Standards. While much of the FY 07 appropriation was expended under an intergovernmental agreement with the IVPA, our plans for the future include ISBE’s issuance of competitive grants to school districts under two distinct programs. New Part 555 describes the intended focus of those programs: “School Mental Health Support Grants” and “Grants for Implementation of Social and Emotional Learning Standards”. The Board’s budget proposal for FY 08 includes $6 million for these grants and related purposes. The rules have been developed so that the agency will be prepared to use on-going appropriations for these grants.

These rules were presented for the Board’s initial review in March of this year and subsequently published in the Illinois Register to elicit public comment. Two communications were received, and the issues raised are discussed in the Summary and Analysis of Public Comment below.

Analysis and Implications for Policy, Budget, Legislative Action and Communications
Policy Implications: Please see above.
Budget Implications: None.
Legislative Action: None needed.
Communication: Please see “Next Steps” below.
Pros and Cons of Various Actions
The Board’s budget request for Fiscal Year 2008 includes funds for the programs described in these proposed rules. Adoption of Part 555 would permit the agency to administer these two competitive grant programs in keeping with the obligations imposed by the Illinois Administrative Procedure Act (IAPA). That is, agencies are required to use rules to state the basis for their decision-making when choosing among eligible applicants for state funds.

Failure to adopt rules would be likely to result in noncompliance with the IAPA if the agency administers the program according to current intentions.

Superintendent’s Recommendation
The Superintendent recommends that the State Board of Education adopt the following motion:

The State Board of Education hereby adopts the proposed rulemaking for:

Children’s Mental Health Initiative Grants (23 Illinois Administrative Code 555).

Further, the Board authorizes the State Superintendent of Education to make such technical and nonsubstantive changes as the State Superintendent may deem necessary in response to suggestions or objections of the Joint Committee on Administrative Rules.

Next Steps
Notice of the adopted rules will be submitted to the Joint Committee on Administrative Rules to initiate JCAR’s review. When that process is complete, the rules will be filed with the Secretary of State and disseminated as appropriate.
Summary and Analysis of Public Comment
23 Ill. Adm. Code 555
(Children’s Mental Health Initiative Grants)

Subpart A: School Mental Health Support Grants

Comment
It was suggested that the term “screening and assessment” used in Section 555.30(a)(1)(A) be changed to “early identification” because the latter would capture more accurately the range of activities involved in identifying students who may need early intervention services. Another comment related to this Section proposed a requirement for the local protocol to describe how students will be identified, referred for services, and followed up.

Analysis
We believe that early identification is adequately addressed in the introductory language to subsection (a)(1), which refers to “identifying those who could benefit from early intervention”. We therefore believe this substitution would make the rule redundant. However, there is no reason we cannot amplify subsection (a)(1) to mention referral and follow-up explicitly. We also note that screening is not always a service that is provided by a mental health professional and that it will sometimes form part of the early identification process. To avoid unnecessary confusion, it would be more useful to eliminate it from the list of services.

Recommendation
Section 555.30(a)(1) should be amplified as shown below:

1) Developing a protocol and structures for meeting the early intervention mental health needs of students, including identifying, referring, and following up on those who could benefit from early intervention, involving parents……………….

In addition, subsection (a)(1)(A) should be edited to refer only to assessment.

Comment
A change in Section 555.30(b) was proposed to state that services must be made available to all students “identified as needing early intervention services” rather than simply “all students housed” in an attendance center served with these grant funds.

Analysis
This rule does not require that every student housed in a particular attendance center must receive services. Instead, it is intended to convey a requirement that no groups of students housed in an attendance center for which funding is provided can be excluded from eligibility to be served. We believe that the language of subsection (b) is correct for that purpose. In addition, there are factors outside a district’s control, such as certain requirements for parental consent, that may prevent some students identified as having a need from receiving services. We thus do not agree that the rule should be recast to require that all be served.

Recommendation
No change is needed in response to this comment.
Comment
With respect to Section 555.40(e), a change was recommended so that the request for proposals for the school mental health support grants would “specify that recipients are required to participate in data collection and evaluation procedures as required by ISBE”, rather than identifying the data recipients would be required to collect and report. The commenter indicated that it might not be possible to specify the required data collection at the time the RFP is released because the evaluation design for the program might not yet be complete. Conversely, it was recommended that grant recipients be required to develop “fidelity measures” that would use data to gauge programs’ efficacy. The data to be collected could include the rates of dropping out, graduation, suspension, and expulsion. Other information such as “office referrals”, in-school suspensions, teacher turnover rates, and hours of training completed, could also be useful.

Analysis
We agree that measuring the effects of this program will be important. We also believe that consistency in the basis of measurement is essential, so that ISBE should specify the data to be gathered rather than leaving the development of “fidelity measures” up to each grant recipient. Subsection (e) as proposed is a standard provision that we have used in numerous recent sets of ISBE’s rules. Its purpose is to ensure that potential applicants can know what they will be required to do before they make a commitment by applying for grant funds. It is incumbent upon the agency to determine what the requirements will be (and they can, of course, be changed in subsequent RFPs if need be).

Recommendation
This suggested change should not be made.

Comment
A change was recommended in the reservation of mental health support grant funds for small districts in Section 555.50(b). Rather than setting aside 20 percent of the funds for these districts, the commenter proposed instead that at least 25 percent of the recipients should be small districts. A similar change was also suggested for the related portion of Section 555.60. This recommendation was based on the experience of the Illinois Violence Prevention Authority (IVPA) in implementing the program during this fiscal year. The commenter indicated that the smaller amounts of money going to these recipients made it difficult to ensure that the full 20 percent could be allocated to them.

Analysis
This comment reveals a problem that we do not believe can be solved by changing the nature of this set-aside, i.e., that there may not be enough high-quality proposals from any distinct group of applicants to ensure that a reserved portion of funds can be used wisely. (It seems that the same issue could arise whether the set-aside is expressed as a percentage of the available funds or a percentage of recipients.)

We note that the original thinking behind this proposal was to ensure diversity among the recipient districts, and there is no disagreement in that respect. However, it is necessary to balance that objective with sufficient accountability for the quality of proposals in order to fund the program most appropriately. A model that was used in the rules for the class size reduction pilot program (Part 565) provides a useful model for blending these goals, by stating the reservation of funds for particular classes of districts as an intention rather than an absolute parameter.
Recommendation
Proposed Section 555.50(b) should be eliminated from the rules, and Section 555.60(a) should be revised as shown below:

a) Twenty percent of the funds available for this program shall be reserved for the Chicago Public Schools and that a further 20 approximately 25 percent of grant recipients shall be reserved for districts that either operate only one school or enroll no more than 1,000 students, although high-quality proposals from these “small districts” may also be supported with funds beyond the amount reserved, as provided in Section 555.50(b) of this Part. The State Superintendent of Education shall approve initial applications and make final determinations regarding the amounts to be provided based upon the total funds appropriated for this initiative, the amounts reserved allocation approach as provided in this subsection (a), the amounts necessary to fund the top-ranked proposals, and the need to distribute the benefits of support for students’ mental health on a statewide basis and among districts of various types.

Comment
It was recommended that applicants submitting their initial proposals in Fiscal Year 2008 be required to demonstrate their readiness to begin immediate implementation of their programs. This was stated to be important because the grant period would be only eight months in length.

Analysis
We do not intend for the FY 08 grant period to be of such a short duration as assumed by the commenter. Preliminary preparation of the RFP is under way in advance of the completion of these rules, and staff intend to make every effort to be ready to release the RFP as soon as possible after they are in effect and the amount of the appropriation is known. Additionally, development of the protocol is one of the major aspects of the grant program. Requiring that it already be in place and ready for implementation would make the proposal review criteria in the rules very difficult to apply. For these reasons we do not consider it advisable to incorporate exceptional requirements into the rules for this one grant year only.

Recommendation
No change is needed in response to this comment.

Comment
A provision was requested to clarify that districts are required to provide services in accordance with local, state, and federal laws and policies related to confidentiality and parental consent.

Analysis
It is not necessary to include in our rules statements about requirements that are imposed under other authority, i.e., requirements that exist whether they are mentioned in ISBE’s documents or not. One advantage of excluding these statements is that it helps avoid the confusion that sometimes arises when selected requirements are noted and others are not. Indeed, this was one of the major areas of focus of the comprehensive rules review ISBE has conducted over the last several years.

Recommendation
No change should be made in response to this comment.
Comment
It was recommended that the rules include a requirement for project budgets to include funds for at least two training meetings in Springfield but encourage budgeting for additional regional and statewide training and networking meetings.

Analysis
Because it is possible that the training schedule will not be the same in every grant year, we would be reluctant to state this requirement in the rules. It should be understood that each RFP can include a group of “program-specific” terms of the grant, of which a requirement such as this is a good example. By using that vehicle we are able to respond to differences that arise over time. (Since “encouragement” does not convey any requirement, it is not useful as part of a rule.)

Recommendation
A requirement related to budgeting for training should not be added.

Comment
It was suggested that, if a subcontract is part of a proposal, the proposal should be required to include a letter from the subcontractor describing its role and the services to be provided.

Analysis
ISBE uses a standard set of assurances, certifications, and terms of the grant that addresses this matter. Each RFP routinely states whether subcontracting will be permitted and, if so, will require applicants to provide a body of information pertaining to each intended subcontract.

Recommendation
No change is needed in response to this comment.

Subpart B: Grants for Implementation of Social and Emotional Learning Standards

Comment
A change in the title of Section 555.130 to “Program Specifications – Planning and Training Grants” was advocated based on the activities that will occur during that grant year. Corresponding changes would also need to be made in the first sentence of that Section and in the title of Section 555.150, which provides the criteria for review of those proposals. Further, it was proposed that the development of three-year plans should be required, as opposed to two-year plans as stated in the proposed rule. This change was based on the desirability of looking beyond the grant period with a view to sustaining the effort.

Analysis
We agree that the Section title and other related wording can be changed to include the reference to training. We also agree that recipients’ accountability for sustaining their systems once grant funding is no longer available would be greatly enhanced by requiring the preparation of a plan that extends beyond the funded period.

Recommendation
The title of Section 555.130 should be expanded to “Program Specifications – Planning and Training Grants”, and the first sentence of that Section should be revised to begin, “The goal of each planning and training grant project under this Subpart B…” Subsection (a) should be
changed to refer to “Activities to be conducted with planning and training grant funds…” Subsection (b) should be edited to refer to “Each proposed planning and training project…”

Additional revisions should be made in Section 555.135(c), to refer to “Receipt of a planning and training grant…”; in the title of Section 555.150 (“Criteria for the Review of Planning and Training Grant Proposals”); and in Section 555.160(b), to note that the first year of the funding cycle is “devoted to planning and training…”

Finally, Section 555.130(a)(4) should be changed to call for preparation of a plan including “a specific, three-year two-year sequence of steps…”, and Section 555.155(a)(1)(B) should be revised to refer to the “proposed three-year two-year plan”.

Comment
Deletion of the phrase “designated by the State Superintendent” from Section 555.130(a)(1) was recommended because the IVPA will be administering the professional development aspect of the program in FY 08. The commenter stated that the State Superintendent would not be designating the regionally based training entities.

Analysis
The phrase in question is needed as part of this rule, because it alerts the reader to the fact that ISBE will be prescribing the source of the training. In this case that would be the IVPA. Regardless of how the training portion of the program is administered, however, the point of the rule that needs to be preserved is that the implementation teams in the funded schools will not be at liberty to select training for themselves.

Recommendation
No change should be made in response to this comment.

Comment
It was suggested that Section 555.130(a)(4) be revised to refer to “integration of the social and emotional learning standards into the participating schools’ ‘educational program, school environment, and other mental health supports’ instead of “curricula and programs”. The commenter believed this wording change would broaden applicants’ understanding of the desired scope of the integration of the standards.

Analysis
We agree that the suggested language gives a more complete sense of the goal of this grant program.

Recommendation
Subsection (a)(4) should be changed as shown below:

4) preparation of a plan setting forth a specific, three-year two-year sequence of steps for moving toward the comprehensive integration of the social and emotional learning standards into the participating schools’ educational program, school environment, and other mental health supports curricula and programs.

Comment
It was recommended that the Chicago Public Schools be exempted from the restriction stated in Section 555.130(c) against using grant funds to pay the salaries of district personnel. The commenter believed it appropriate to permit this type of expenditure for that school district.
because of the coordination needed due to the number of schools that would be participating. However, a separate comment requested a clarification that no more than two or three schools in any one district would be able to participate. This Section was also pointed out as possibly an appropriate location to state a prohibition against supplanting.

**Analysis**
It would not be our intention to limit each district to a uniform and very small number of schools for funding with this grant. We would view such a provision as too restrictive given the variability in size and capacity among Illinois school districts. Further, it was later clarified that the comment on limiting the number of participating schools had not been intended to apply to Chicago.

The use of grant funds for salaries is closely related to the issue of supplanting. By its nature, this grant involves mainly additional work on the part of people who are already employed within the recipient districts. For that reason we believe that the provision for stipends covering that extra work or time is generally appropriate, and it is reasonable to expect districts to absorb some portion of any additional costs as evidence of their commitment to the program and to sustaining it after the cessation of grant funding. However, we agree that a separate level of staff effort will be required for coordination once a district is involving a significant number of schools in the planning and training portion of this grant program and that in those instances it should be permissible to use grant funds to offset that additional cost. Rather than make an exception for the Chicago Public Schools alone, we believe it would be more appropriate to link this exception to the number of schools served and make it available wherever that threshold is reached.

The review of this issue has also led us to consider how this matter should be treated with regard to the SEL implementation grants. No provision has been made on this account in Section 555.135, and we believe it will be appropriate to state the same provisions for the use of grant funds for salaries with regard to the implementation phase.

**Recommendation**
Section 555.130(c) should be amplified as shown below.

**c)** No more than five percent of the grant funds may be used for general administrative expenses. No grant funds shall be used to pay the salaries of district personnel. However, stipends for extra work or time on the part of district employees, as well as necessary costs for substitute teachers, shall be allowable expenses. Grant funds may be used to pay the salaries of district personnel only when at least six schools in a district are participating in planning and training projects under this Subpart B.

Language should also be added to Section 555.135 (Program Specifications – Implementation Grants), as follows:

**a)** Grant funds shall be used only to defray costs associated with the time-specific, measurable steps outlined in the recipient’s plan (e.g., working to identify specific additions and modifications that will be made to particular aspects of schools' services or curriculum, assigning responsibility for the accomplishment of those modifications, and ensuring that responsible staff receive any necessary professional development in order to deliver the curriculum and address the
standards effectively). The use of grant funds to pay the salaries of district personnel shall be limited as provided in Section 555.130(c) of this Part.

Comment
It was proposed that Section 555.135(c) be deleted so that receipt of a planning and training grant would be a prerequisite to eligibility for implementation funding. The commenter stated that this had been the intention of the Illinois Children’s Mental Health Partnership and would ensure that uniform training and technical assistance were provided. For the sake of consistency, a related change was also recommended in Section 555.160(b).

Analysis
On balance, we agree that it would be more useful to structure this grant cycle so that each recipient of funding for implementation will have received the same orientation and support before moving into that phase. This will also ensure that the program evaluation can be conducted on a consistent basis.

Recommendation
Section 555.135(c) should be deleted in its entirety. (Subsection (d) will then become the new (c).) This change will also necessitate greater specificity in Section 555.120 (Eligible Applicants). That Section should be revised to state:

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Eligible applicants for planning and training grants under this Subpart B shall be those identified in Section 555.20 of this Part, and joint applications shall be permitted as stated in that Section. Eligibility for implementation grants under this Subpart B shall be limited to entities that have received planning and training grants for the respective prior school year and successfully completed those activities in accordance with the approved grant agreements.
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Section 555.160(b) should be shortened as shown below:

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b) It is the intention of the State Board of Education to approve projects under this Subpart B for a three-year period, in which the first year is devoted to planning and the second and third years are devoted to implementation of the plan. Recipients of planning grants shall be given priority consideration in the subsequent awarding of implementation grants. However, receipt of a planning grant shall not be a prerequisite to receipt of an implementation grant (see Section 555.135 of this Part).
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Comment
A reversal of Section 555.135(d) was requested, so that entities that have completed a funding cycle under Subpart B of the rules would not subsequently be eligible to apply as new applicants. The rationale for this was that there is a reasonable expectation that districts could build on the knowledge base gained through the grant program and extend the implementation of the standards to other schools without additional funding.

Analysis
We do not agree that this assumption will be warranted in all cases, particularly where unit districts are involved. We would not want to establish a restriction that might preclude districts from involving additional staff and improving services and outcomes for additional children. Instead, we believe it is preferable to make subsequent grants available and allow districts to compete if they wish to do so. However, it should be made clear that a new planning and
training grant will be required prior to any new implementation grant so that the entire cycle remains intact, and districts would need to complete one grant project before commencing another. An exception to this limitation should be made for the Chicago Public Schools due to the large number of schools and students who could benefit from the program. Finally, it would be reasonable to give first claim to those applicants that have not yet received any funding through this program, again with an exception for CPS.

**Recommendation**
Section 555.135(c) (formerly subsection (d)) should be expanded with a clarification, as follows:

- **c)** A district that has received two years’ implementation funding under this Subpart B shall be eligible to submit a planning and training grant proposal as a new applicant in a subsequent year, provided that:
  1) the applicant, if other than a district organized under Article 34 of the School Code [105 ILCS 5/Art. 34], has successfully completed the entire previous grant cycle; and
  2) the new project will involve only schools not already served under a project previously funded.

Section 555.160 (Allocation of Funds) should be amplified with the following statement:

> Proposals for new projects from districts that have already completed a grant cycle under this program shall be funded only if sufficient funds remain available after awards are made for all approvable applications from districts that have not yet participated, provided that this limitation shall not apply to a school district organized under Article 34 of the School Code.

**Comment**
Changes were also suggested, to characterize implementation projects as “renewals” and to require a three-year plan that would encompass the year after the last year of funding. (These would also affect the title of Section 555.155 and the description of the plan in subsection (a)(1)(B) of that Section.)

**Analysis**
As can be seen from the discussion of the application procedure in Section 555.40 (see subsection (h)), applications for renewal of grant funding are treated differently than initial applications and are not subject to the criteria that are stated in Section 555.155. Thus it would be impractical to consider the first year of implementation funding as a renewal. Further, “renewal” implies that another year’s funding is granted for the same purpose as in the initial year, which is not the case when considering planning and training as opposed to implementation. The structure that is established in the proposed rules provides for a planning and training grant, at the end of which a plan must be completed. The merits of that plan, along with the district’s need for state assistance, must be considered in determining which implementation proposals the agency should fund. To make implementation funding more or less automatic after the planning and training year would undermine the agency’s ability to hold recipients accountable for the quality of their commitment and planning. The sequence as proposed, including separate, competitive criteria for initial implementation proposals, is consistent with our approach to other grant programs over the years, including the Urban
Education Partnership Program, the Charter Schools Program, and program of Grants for Arts Education and Foreign Language Education.

Recommendation
The proposed structure of this program should not be altered as outlined by this commenter.

Comment
It was suggested that the set of criteria presented in Section 555.150 (for the review of planning grant proposals) be replaced with the criteria that had been used in the RFP issued for FY 07 by the Illinois Violence Prevention Authority, and that language was supplied (please see the attachment that follows this summary). Several specific problems were identified, including the preference given to districts already having begun the process of integrating the SEL standards into curriculum (see subsection (a)(1)). It was stated that this should not be a threshold requirement for grant funding and that schools should be supported even if staff have not begun work in this area if they are eager to do so.

The commenter also took issue with the provisions regarding need, in that the language conveys the idea that low-income students have a greater need for the SEL standards than others do. This was contrasted with the philosophy that all students need exposure to these standards as part of their educational experience.

Analysis
In developing the sets of review criteria for use in these rules, we followed the general model provided by other sets of ISBE’s grant rules. This explains some of the differences between the criteria stated in Part 555 and those used in IVPA’s request for proposals, in which the 100 available points were divided among five categories. For example, we combined the IVPA categories of “program need” and “financial need” into one larger set of points for need and included some criteria relevant to each aspect.

Because this set of criteria is for a planning (and training) grant, we also combined “project implementation and management” and “district background and capacity” into a category for “readiness”. We could not justify awarding points for the likelihood that an applicant’s plan for infusing the standards into its schools would be implemented efficiently and effectively, again because this set of criteria is for judging planning grant applications. Receipt of these grants will lead to development of plans, so the plans will not yet exist when these applications are submitted and the likelihood of their implementation cannot be gauged at that point.

It should also be understood also that proposed subsection (a)(1) would not require that school staff have begun implementing the standards in order for the district to receive funding. Rather, the rule would give more points to districts that had made a start, since that would be evidence of readiness. This is, in fact, very similar in meaning to the IVPA criterion that stated, “The applicant’s experience with and knowledge of the Social and Emotional Learning Standards suggests it has the commitment to fully participate in the professional development project.”

Finally, there is no absolute need for the review criteria used in future years to match exactly those that were used in the first year of the program’s operation. It is more important to determine the best possible basis for judging proposals in comparison to one another and then ensure that the criteria reflect that determination.

We do agree that it would be reasonable to place less emphasis on readiness if that is understood to mean prior experience involved with implementation of the SEL standards, since
the goal of the program is certainly to encompass those districts without that experience but with a commitment to their implementation. We understand that the level of commitment is also very important but hope the rule-related problem with commitment is evident. Commitment is an attitude, and it is very difficult to demonstrate commitment without evidence of some prior action. Statements of commitment are just that, and they do not provide a comparative basis for decision-making about grant awards. This is not an easy issue to resolve because of the necessity for rules to be concrete and to provide clear standards for the judgments that are made.

After considering how the review criteria could be made more serviceable, we determined that it would be preferable to reverse the weight given to readiness and need so that need would be preeminent. We also understand the disinclination to refer to students’ family and socio-economic backgrounds, since risk factors can occur with respect to students in many situations. Finally, we believe some further indications of readiness can be derived from a review of applicants’ rationale for some of their choices and that the criteria should be strengthened in this regard.

**Recommendation**
The material in subsections (a)(1) and (a)(2) should be reversed so that need is discussed first, with 50 points awarded to that set of criteria. The statement that will become subsection (a)(1)(A) should also be revised as shown below:

A) the applicant serves a significant number of students who are subject to risk factors, such as financial need, absence or unemployment of a parent, chronic illness, or homelessness, that may jeopardize whose family backgrounds or socio-economic situations may not adequately foster their social and emotional well-being; and

The material on readiness that will become subsection (a)(2) and receive 40 points should be changed to state:

2) Readiness

A) The proposal presents a defensible rationale for the selection and number of schools to be served and demonstrates that district staff members have begun the process of integrating the SEL standards into curriculum and learning experiences for students, and the applicant’s choice of members for the Implementation Teams will make efficient use of any staffs prior involvement in SEL-related activities with the standards.

B) The proposed sequence of activities reflects the applicant’s policy adopted under Section 15 of the Children’s Mental Health Act of 2003 [405 ILCS 49/15], as well as an appropriate relationship between the professional development to be provided to participants and the planning activities that will occur.

C) The proposal demonstrates an allocation of district resources and administrative effort that will be sufficient for the management of the grant activities, commensurate with the district’s ability to contribute, and indicative of engagement in the project on the part of the district’s leadership.
Comment
It was noted that Section 555.150(b) contains a cross-reference to Section 555.50(b) and that the recommended changes in that earlier Section would make this cross-reference inappropriate. Rather, the original language of Section 555.50(b) should be placed into Section 555.150(b). In addition, a new Section 555.150(c) would be needed in order to carry over the statement that the provisions of Section 555.50(c) apply to the distribution and ranking of proposals under Subpart B.

Analysis
Section 555.50(b) was the provision that stated the set-asides of portions of the funding for the Chicago Public Schools and for small districts. As noted above, its deletion is being recommended, and this means that proposed subsection (c) will become (b) and there will be no (c). Since we have concluded that it is preferable not to reserve portions of the funding absolutely for any class of applicants, the appropriate change to Section 555.150(b) will be a more limited cross-reference that preserves the priority ranking for districts in which a majority of students are eligible for free or reduced-price lunches.

Recommendation
Section 555.150(b) should be revised to state:

b) The provisions of Section 555.50(b) and (c) of this Part shall apply to the distribution and ranking of proposals under this Subpart B.

Comment
A new subsection (a)(1)(D) was proposed to state, “The proposal clearly articulates specific achievable goals and objectives for implementation of the three-year plan in the second year of funding.”

Analysis
We would consider it premature to require implementation-related material in an application for planning grant funds, since the purpose of the grant support is specifically the development of a plan for implementation. However this point certainly is relevant to implementation grant proposals and can be used to strengthen that portion of the rules.

Recommendation
Section 555.155(a)(1)(B) should be revised as shown below:

B) The proposed three-year two-year plan sets forth measurable goals and objectives and is likely to result in significant progress toward the complete integration of the SEL standards into the schools’ curricula and programs and to assist students in achieving those goals and standards.
Review Criteria for Planning (and Training) Grant Proposals  
(from FY 2007 RFP by IVPA)

A. District Background and Capacity (25 Points)

The proposal clearly describes the population that will be served by this grant and provides a supportable rationale for selecting the schools that will participate in grant activities.

The applicant’s plan to infuse the SEL Standards into its schools is likely to be implemented in an efficient and effective manner. The applicant’s experience with and knowledge of the Social and Emotional Learning Standards suggests it has the commitment to fully participate in the professional development project.

B. Program Need (25 Points)

The proposal shows a clear understanding of the importance of the SEL Standards as well as the need for professional development to implement the standards. The criteria proposed to select schools for participation is likely to identify those schools that have the greatest need for and would benefit the most from SEL Standards implementation.

C. Project Implementation and Management (35 Points)

The roles of and activities proposed for the participating schools are appropriate and likely to lead to successful implementation. The proposed steps to manage the professional development and related activities will demonstrate a strong commitment on the part of the administration to fully support the participation of the schools identified.

D. Financial Need (10 Points)

The proposal demonstrates a significant need for grant funds based on the use of available data, including the number of students eligible for free and reduced-price lunch and the district financial status, to effectively describe the district and the families and students it serves.

E. Cost-Effectiveness (5 Points)

The proposed budget is cost-effective as evidenced by the cost of proposed activities in relation to the numbers to be served and the services to be provided.
ILLINOIS REGISTER

STATE BOARD OF EDUCATION

NOTICE OF ADOPTED RULES

TITLE 23: EDUCATION AND CULTURAL RESOURCES
SUBTITLE A: EDUCATION
CHAPTER I: STATE BOARD OF EDUCATION
SUBCHAPTER o: MISCELLANEOUS

PART 555
CHILDREN’S MENTAL HEALTH INITIATIVE GRANTS

SUBPART A: SCHOOL MENTAL HEALTH SUPPORT GRANTS

Section
555.10 Purpose and Applicability
555.20 Eligible Applicants
555.30 Program Specifications
555.40 Application Procedure
555.50 Criteria for the Review of Initial Proposals
555.60 Allocation of Funds

SUBPART B: GRANTS FOR IMPLEMENTATION OF SOCIAL AND EMOTIONAL LEARNING STANDARDS

Section
555.110 Purpose and Applicability
555.120 Eligible Applicants
555.130 Program Specifications – Planning and Training Grants
555.135 Program Specifications – Implementation Grants
555.140 Application Procedure
555.150 Criteria for the Review of Planning and Training Grant Proposals
555.155 Criteria for the Review of Implementation Grant Proposals
555.160 Allocation of Funds

555.APPENDIX A Social and Emotional Learning Standards

AUTHORITY: Implementing Section 15 of the Children’s Mental Health Act of 2003 [405 ILCS 49/15] and authorized by Section 2-3.6 of the School Code [105 ILCS 5/2-3.6].

SOURCE: Adopted at 31 Ill. Reg. _____, effective ______________.
SUBPART A: SCHOOL MENTAL HEALTH SUPPORT GRANTS

Section 555.10 Purpose and Applicability

This Subpart A establishes the application procedure and criteria for selection by the State Superintendent of Education of the entities that will receive grant funds for programs designed to support students’ mental health by:

a) enhancing the recipients’ capacity to identify and meet students’ needs for early, coordinated mental health intervention services in “natural” settings;

b) contributing to the development of a mental health support system for students that is integrated with community mental health agencies and other agencies and systems that serve children; and

c) reducing the stigma associated with mental health and mental illness within the school community.

Section 555.20 Eligible Applicants

Eligible applicants shall be school districts, public university laboratory schools approved by the State Board of Education pursuant to Section 18-8.05(K) of the School Code [105 ILCS 5/18-8.05(K)], charter schools, and area vocational centers. For purposes of this Part, the terms “applicant” and “district” shall be understood to include all these eligible entities.

a) Joint applications for funds may be submitted by any combination of eligible applicants, provided that one of the participants shall be designated to serve as administrative agent.

b) No applicant shall participate in more than one proposal under this Subpart A.

Section 555.30 Program Specifications

a) In order to achieve the goals specified in Section 555.10 of this Part, each proposed project shall include objectives and activities related to:

1) Developing a protocol and structures for meeting the early intervention mental health needs of students, including identifying, referring, and
following up on those who could benefit from early intervention, involving parents and other care-givers, and planning for and providing services from qualified mental health professionals, such as:

A) assessment,

B) individual and group counseling,

C) family support, and

D) school-wide mental health awareness activities;

2) Coordinating services with those offered by other community-based service systems and providers by:

A) developing a framework for the integration of social and emotional learning and mental health-related initiatives based on a team approach that includes school staff, community-based providers, students, and their families to build upon existing mental health structures,

B) implementing formal interagency working agreements, and

C) providing services in “natural” settings such as schools, youth-serving agencies, or family homes; and

3) Reducing the mental health stigma within the school community by:

A) conducting events for the school faculty, students, and family members to increase awareness regarding the impact of mental illness, the efficacy of mental health treatment, and the importance of early identification,

B) addressing mental health stigmas that are specific to particular cultures or segments of the community, and

C) promoting leadership among students and support for peers with regard to issues of mental health.
b) Each proposed project shall make services available to all students housed in any attendance center for which funding is provided under this Subpart A.

Section 555.40 Application Procedure

For purposes of this Part, the terms “proposal” and “application” shall have the same meaning.

a) When State funding is available for grants under this Subpart A, the State Superintendent of Education shall issue a Request for Proposals (RFP) in order to solicit applications from eligible entities.

b) The RFP shall describe the format that applicants will be required to follow and the information they will be required to submit, including, but not limited to, descriptive information about the district, demographic information about the student population, identification of the specific schools that will be served and their needs, a plan of work for the project, an evaluation plan, and information about any related efforts that have already been undertaken.

c) The RFP shall indicate the amount or expected amount of the appropriation for the program and shall describe the allowable expenditures and the basis for awarding grants.

d) The RFP shall require completion of a budget summary and payment schedule as well as a narrative budget breakdown, i.e., a detailed explanation of each line item of expenditure.

e) The RFP shall identify the data recipients will be required to collect and report regarding the activities conducted with grant funds and the results of those activities, as well as the timelines for reporting and any required participation in technical assistance activities.

f) The RFP shall include certification and assurance forms that the State Superintendent may require.

g) The RFP shall specify the deadline for submission of proposals, which shall provide potential applicants with at least 30 days to respond.
h) Separate applications shall be required for renewal of grant funding. Each application for renewal shall include at least:

1) a description of expenditures and activities during the year just concluded, demonstrating that the project has been implemented in conformance with the approved grant agreement and that the recipient continues to exhibit a need for grant funds for this purpose; and

2) an updated budget summary and payment schedule for the renewal year, including a narrative budget breakdown.

i) Incomplete proposals shall not be considered.

Section 555.50 Criteria for the Review of Initial Proposals

a) Applications for initial funding shall be evaluated in accordance with the following criteria:

1) Project Implementation and Management (50 points)
   
   A) The proposed project is likely to result in a student mental health support system that will assist the district in identifying and meeting the mental health needs of students through collaboration with other community agencies that serve children and address mental health issues.

   B) The proposed amount of time for services is appropriate for the number of students likely to be served, and the staff and partnerships to be dedicated to this initiative have the capacity to provide this level of service.

   C) The proposed objectives and timelines for conducting the activities of the project, including those of any subcontractors, adequately match the project’s goals.

2) Need (35 points)
The applicant has a significant need for the grant that cannot be met through use of existing resources, as evidenced by data that substantiate:

A) the level and nature of need among members of the student population; and

B) the district’s need for additional resources to address gaps in school mental health services.

3) Cost-Effectiveness (15 points)

The proposed budget is cost-effective, as evidenced by the cost of the proposed activities in relation to the numbers to be served and the services to be provided. The criteria used in selecting schools for participation will contribute to achieving the widest possible impact.

b) Among proposals that receive substantially equal rankings, priority will be given to districts in which more than 50 percent of the students are eligible for free or reduced-price lunches.

Section 555.60 Allocation of Funds

a) It is expected that twenty percent of the funds available for this program will be allocated to the Chicago Public Schools and that approximately 25 percent of grant recipients will be districts that either operate only one school or enroll no more than 1,000 students. The State Superintendent of Education shall approve initial applications and make final determinations regarding the amounts to be provided based upon the total funds appropriated for this initiative, the allocation approach as provided in this subsection (a), the amounts necessary to fund the top-ranked proposals, and the need to distribute the benefits of support for students’ mental health on a statewide basis and among districts of various types.

b) It is the intention of the State Board of Education to approve funding for projects under this Subpart A for a three-year period. Funding for the second and third years shall be contingent upon the availability of funds for the program and evidence presented in renewal proposals that the projects have been implemented in accordance with the approved grant agreements and that the recipients continue to need additional State resources in order to meet their students’ mental health needs effectively.
c) A district that has received three years’ funding under this Subpart A may subsequently apply as a new applicant.

SUBPART B: GRANTS FOR IMPLEMENTATION OF SOCIAL AND EMOTIONAL LEARNING STANDARDS

Section 555.110 Purpose and Applicability

This Subpart B establishes the application procedure and criteria for selection by the State Superintendent of Education of the entities that will receive grant funds for activities associated with implementing the social and emotional learning standards set forth in Appendix A to this Part, including participation in relevant training and technical assistance.

Section 555.120 Eligible Applicants

Eligible applicants for planning and training grants under this Subpart B shall be those identified in Section 555.20 of this Part, and joint applications shall be permitted as stated in that Section. Eligibility for implementation grants under this Subpart B shall be limited to entities that have received planning and training grants for the respective prior school year and successfully completed those activities in accordance with the approved grant agreements.

Section 555.130 Program Specifications – Planning and Training Grants

The goal of each planning and training grant project under this Subpart B shall be the development of a two-year plan for implementation of the social and emotional learning (SEL) standards set forth in Appendix A to this Part, as applicable to the grade levels of the participating schools.

a) Each participating school shall be required to establish an implementation team consisting of at least a school administrator, a teacher, and a representative of the families whose children attend the school. Activities to be conducted with planning and training grant funds shall include, but need not be limited to:

1) participation by each school’s implementation team in training and technical assistance activities made available by the regionally based training entity designated by the State Superintendent of Education;
2) conducting at least two family education sessions relating to the social and emotional learning standards;

3) identifying gaps in available resources and services related to social and emotional learning; and

4) preparation of a plan setting forth a specific, three-year sequence of steps for moving toward the comprehensive integration of the social and emotional learning standards into the participating schools’ educational programs, school environment, and other mental health supports.

b) Each proposed planning and training project shall encompass all students housed in any attendance center for which funding is provided.

c) No more than five percent of the grant funds may be used for general administrative expenses. Stipends for extra work or time on the part of district employees, as well as necessary costs for substitute teachers, shall be allowable expenses. Grant funds may be used to pay the salaries of district personnel only when at least six schools in a district are participating in planning and training projects under this Subpart B.

Section 555.135 Program Specifications – Implementation Grants

Implementation grant funds provided under this Subpart B shall be used for the purpose of integrating the SEL standards into the participating schools’ curricula and programs.

a) Grant funds shall be used only to defray costs associated with the time-specific, measurable steps outlined in the recipient’s plan (e.g., working to identify specific additions and modifications that will be made to particular aspects of schools’ services or curriculum, assigning responsibility for the accomplishment of those modifications, and ensuring that responsible staff receive any necessary professional development in order to deliver the curriculum and address the standards effectively). The use of grant funds to pay the salaries of district personnel shall be limited as provided in Section 555.130(c) of this Part.

b) Each implementation project shall encompass all students housed in any attendance center for which funding is provided.
c) A district that has received two years’ implementation funding under this Subpart B shall be eligible to submit a proposal as a new applicant in a subsequent year, provided that:

1) the applicant, if other than a district organized under Article 34 of the School Code [105 ILCS 5/Art. 34], has successfully completed the entire previous grant cycle; and

2) the new project will involve only schools not already served under a project previously funded.

Section 555.140 Application Procedure

The provisions of Section 555.40 of this Part shall apply to grants under this Subpart B.

Section 555.150 Criteria for the Review of Planning and Training Grant Proposals

a) Applications for funding shall be evaluated in accordance with the following criteria:

1) Need (50 points)

The proposal demonstrates that:

A) the applicant serves a significant number of students who are subject to risk factors, such as financial need, absence or unemployment of a parent, chronic illness, or homelessness, that may jeopardize their social and emotional well-being; and

B) gaps in current programs and systems have resulted in inadequate or uneven attention to the social and emotional learning needs of the students housed in the participating schools; and

C) the applicant needs additional resources to prepare for the integration of the SEL standards into the participating schools’ curricula and programs.

2) Readiness (40 points)
A) The proposal presents a defensible rationale for the selection and number of schools to be served and demonstrates that the applicant’s choice of members for the Implementation Teams will make efficient use of any prior involvement in SEL-related activities.

B) The proposed sequence of activities reflects the applicant’s policy adopted under Section 15 of the Children’s Mental Health Act of 2003 [405 ILCS 49/15], as well as an appropriate relationship between the professional development to be provided to participants and the planning activities that will occur.

C) The proposal demonstrates an allocation of district resources and administrative effort that will be sufficient for the management of the grant activities, commensurate with the district’s ability to contribute, and indicative of engagement in the project on the part of the district’s leadership.

3) Cost-Effectiveness (10 points)

The proposed budget is cost effective, as evidenced by the cost of proposed activities in relation to the numbers of individuals participating in the planning effort and the quantity of schools involved.

b) The provisions of Section 555.50(b) of this Part shall apply to the distribution and ranking of proposals under this Subpart B.

Section 555.155 Criteria for the Review of Implementation Grant Proposals

a) Applications for funding shall be evaluated in accordance with the following criteria:

1) Quality of the Plan (65 points)

A) The proposal demonstrates that strategies and activities for integrating the SEL standards were selected with specific reference
to the applicant’s assessment of available resources and school-wide needs.

B) The proposed three-year plan sets forth measurable goals and objectives and is likely to result in significant progress toward the complete integration of the SEL standards into the schools’ curricula and programs and to assist students in achieving those goals and standards.

C) The school staff members who will be involved with the integration of the SEL standards have the professional development and capacity to implement the plan.

2) Need (25 points)

The proposal demonstrates that:

A) the applicant serves a significant number of students whose family backgrounds or socio-economic situations may not adequately foster their social and emotional well-being; and

B) gaps in current programs and systems have resulted in inadequate or uneven attention to the social and emotional learning needs of the students housed in the participating schools; and

C) the applicant needs additional resources for the integration of the SEL standards into the participating schools’ curricula and programs.

3) Cost-Effectiveness (10 points)

The proposed budget is cost effective, as evidenced by the cost of proposed activities in relation to the numbers to be served and the services to be provided.

b) The provisions of Section 555.50(b) and (c) of this Part shall apply to the distribution and ranking of proposals under this Subpart B.
**Section 555.160  Allocation of Funds**

a) The provisions of Section 555.60(a) of this Part shall apply to the allocation of funds under this Subpart B.

b) It is the intention of the State Board of Education to approve projects under this Subpart B for a three-year period, in which the first year is devoted to planning and training and the second and third years are devoted to implementation of the plan. Proposals for new projects from districts that have already completed a grant cycle under this program shall be funded only if sufficient funds remain available after awards are made for all approvable applications from districts that have not yet participated, provided that this limitation shall not apply to a school district organized under Article 34 of the School Code.
Section 555. APPENDIX A  Social and Emotional Learning Standards

Goal 1: Develop self-awareness and self-management skills to achieve school and life success.

   Learning Standard A: Identify and manage one’s emotions and behavior.
   Learning Standard B: Recognize personal qualities and external supports.
   Learning Standard C: Demonstrate skills related to achieving personal and academic goals.

Goal 2: Use social awareness and interpersonal skills to establish and maintain positive relationships.

   Learning Standard A: Recognize the feelings and perspectives of others.
   Learning Standard B: Recognize individual and group similarities and differences.
   Learning Standard C: Use communication and social skills to interact effectively with others.
   Learning Standard D: Demonstrate an ability to prevent, manage, and resolve interpersonal conflicts in constructive ways.

Goal 3: Demonstrate decision-making skills and responsible behaviors in personal, school, and community contexts.

   Learning Standard A: Consider ethical, safety, and societal factors in making decisions.
   Learning Standard B: Apply decision-making skills to deal responsibly with daily academic and social situations.
   Learning Standard C: Contribute to the well-being of one’s school and community.