Teacher and Paraeducator Registered Apprenticeship Program Questions

Introduction

One of Iowa students’ most important resources in school is their teachers. For this reason, it is critical to Iowa's success that we keep the great teachers we currently have and bring additional talented educators into the profession. To that end, the Iowa Department of Education (IDE) through Iowa Workforce Development (IWD) will create the Teacher and Paraeducator Registered Apprenticeship (TPRA) program.

The IDE and IWD will award $9 million in competitive TPRA grants to school district employer sponsors to reinforce combined efforts and regional initiatives that accelerate paraeducator and teacher credential attainment. This grant program is funded by the IDE American Rescue Plan (ARP) Act's Elementary and Secondary School Emergency Relief (ESSER III or ARP ESSER) state project funds and supports two registered apprenticeship models:

- **High School and Adult-to-Paraeducator (Teacher Aide 1) Registered Apprenticeship**: A registered apprenticeship model designed to help high school students or adults working in schools begin a career as a paraeducator (Teacher Aide 1) while earning credit toward an associate’s degree.
- **Paraeducator-to-Teacher Registered Apprenticeship**: A registered apprenticeship model designed to help certified paraeducators continue to work while earning credit toward their bachelor’s degree and teaching license.

Application Requirements

An employer sponsor must submit its application electronically via IowaGrants.gov by Friday, April 15, 2022, at 3:00 pm Central Time. IWD recommends that applicants create an account and begin the application in advance of the deadline. For additional guidance on applying, refer to the Notice of Funding Opportunity.

Purpose

The purpose of this document is to address the questions posed by the field during the January webinar. This frequently asked questions document is grouped around the following areas:

- Award Eligibility;
- Partner Eligibility;
- Participant Eligibility;
- General Grant Design;
- Program Requirements, Student Teaching Hours, and Credits;
- Applying, Evaluating, and Awarding TPRA Grants;
- Allowability of Expenses; and
- Miscellaneous.
Award Eligibility

1. Who is eligible for a TPRA grant?
   Any employer sponsor – or a school district registered with the U.S. Department of Labor's Office of Apprenticeship – that partners with an accredited related training provider (see #4 for the definition) and meets the minimum cohort (i.e., 10 registered apprentices) required to participate in the program.

2. Can an individual apply for a grant?
   No. Only eligible employer sponsors can apply (see #1 for more information on eligibility).

3. Is this for public schools only?
   Yes. TPRA is only for public schools because ESSER funds support it. Nonpublic schools have the separate Emergency Assistance to Nonpublic Schools (EANS) program for services.

Partner Eligibility

4. Who may be a partner?
   Any accredited related training provider (i.e., community college, four-year college, four-year university) that meets all the requirements for the model(s) selected. The requirements for each model are provided in the following table.

<table>
<thead>
<tr>
<th>Requirement</th>
<th>High School and Adult-to-Paraeducator</th>
<th>Paraeducator-to-Teacher</th>
</tr>
</thead>
<tbody>
<tr>
<td>The related training provider must be in Iowa.</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>The related training provider must be accredited by a U.S. Department of Education-approved agency.</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>The related training provider must have a State Board-approved educator preparation program.</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>The related training provider must be in good standing with the State of Iowa.</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

5. Do the partnering community colleges need to have a paraeducator program recognized by the BOEE?
   No. Partnering community colleges are not required to have a paraeducator program recognized by the Iowa Board of Educational Examiners (BOEE) to participate but must meet all applicable requirements provided in #4.

6. Would four-year programs with an approved paraeducator program qualify as a partner for the High School-to-Paraeducator model?
   Yes. A four-year program with an approved paraeducator program would qualify as a partner.

7. Will the Department consider partnering with Head Start classrooms?
   No. The TPRA grant program is funded by ESSER funds and must go to school districts. Since Head Start receives its funding directly from the federal government and is an organization separate from a school district, they are not eligible program partners.
8. Do community colleges and four-year institutions need to be in Iowa?
   Yes. All partnering institutions of higher education (e.g., community colleges, colleges, universities) must be in Iowa.

9. Can a district partner with multiple colleges or universities to expand the ultimate license areas available?
   Yes. A school district can partner with multiple colleges and/or universities to expand the license areas available.

10. Is there a requirement to go on to the teacher program when you finish the paraeducator program? As I understand it, you could stop when you obtain the paraeducator certification.
    No. You do not have to continue to the Paraeducator-to-Teacher model after obtaining the paraeducator certification.

11. How does the training for paraeducator certification at a higher education institution differ from paraeducator certification through the AEA? The AEA has three courses.
    All paraeducator programs must meet the requirements specified in Iowa Administrative Code chapter 281—80 (50 contact hours of coursework and clinical experiences). Part of the program is to earn a degree. An accredited community college, four-year college, or four-year university is required to award college credit. An AEA cannot do so.

12. Can an AEA offer training/classes for paraeducators and be funded for them through this program?
    No. These program funds must go to district employer sponsors who partner with an accredited related training provider (i.e., community college, four-year college, four-year university) that meets all the requirements for the model(s) selected (see #4).

13. If we already have college credits and would like to continue at the same college, how do we get our college to partner with our school district? Does the college have to be local?
    Our recommendation is that you talk to your college administration about partnering with a school district.

Participant Eligibility

14. Can participants be currently enrolled in university classes?
    Yes. Program participants may be enrolled in university or college classes.

15. I am an interpreter for English learners; is TPRA something I can apply for?
    No. Only a school district employer sponsor may apply for a TPRA grant. However, if you work in an awarded district, you could begin in the Adult-to-Paraeducator program.

16. Could I use the Paraeducator-to-Teacher model if I am a certified paraeducator with substitute authorization and work for multiple school districts?
    Yes. A certified paraeducator can use the model to work towards attaining their teaching license. However, substitute teaching will not count toward the clinical hour requirements for teacher certification that require a cooperating teacher.
17. Can a year-long substitute teacher participate in the program?
   Yes. The substitute teacher can use the Paraeducator-to-Teacher model to work toward a teaching license. It is important to note that substitute teaching will not count toward teacher certification clinical hours that require a cooperating teacher.

18. If the paraeducator is only two or three classes shy of their teaching degree, is this program beneficial to them? If yes, are they required to complete the whole program, or could the paraeducator use it to complete the student teaching portion in their district while still being employed as a paraeducator?
   Yes. However, this is not the ultimate purpose of the TPRA grant funds. The purpose of the funds is to bring more individuals into the teaching profession – not to fund paraeducators near graduation – but, ultimately, the district decides how best to use the funds to maximize the number of teachers brought into the workforce. If the district decides to support such an educator with TPRA funds, they can continue where they are in their coursework.

19. Could a high school student be working toward a teaching certificate?
   Yes. However, this is a pilot grant program and is currently supported by one-time emergency relief funds. The grant program funds are only available through 2024, which would not be enough time to complete the entire program.

20. Is the Paraeducator-to-Teacher program limited to specific grade levels and/or content areas for teaching licenses? Would CTE teaching licenses be included as well?
   No. It is designed for a general education initial license. It is intended to include elementary generalists and high school teachers. Career and technical education (CTE) endorsements will be included.

21. Does the paraeducator position have to be a classroom paraeducator assignment? Or would a special education paraeducator or a one-on-one paraeducator work too?
   No. The paraeducator position does not necessarily need to be a classroom assignment, but the paraeducator must be assigned to a teacher of record.

22. Is full-time status required to participate in the program?
   No. Full-time status is not required to participate in the TPRA program.

23. If I have an associate’s degree in education, can I participate in the program to assist with my bachelor’s for teaching?
   Yes. If the district is awarded a grant, the individual can participate in the program.

24. If our paraeducators are already certified without an associate’s degree, are they eligible for part 2 of the program?
   If the district is awarded a grant, the certified paraeducators can participate in the program using the Paraeducator-to-Teacher model. To achieve a teacher certificate, they will need to complete all required coursework.

25. Does an individual need to have an agreement with their district that they are going to be part of the program before even completing the application?
   No. This program is created for district applicants, not for individuals.
26. Can a registered apprentice get paid during student teaching?
   Yes. The registered apprentice can be paid as a paraeducator – but not as a substitute teacher – during student teaching. The apprentice must be placed with a classroom teacher.

27. If I'm working full-time in a school district, can I be a part-time student and participate?
   Yes. If the district is awarded a grant, you may participate. However, it will just take longer to complete the coursework than this grant can support.

28. What is the minimum number of hours you must work to qualify for the grant?
   Individuals do not qualify for a TPRA grant; only districts may apply (see the previous Award Eligibility section). However, if the district is awarded a grant, it decides the minimum number of hours required to participate in the program.

29. Do participants have to be contracted into a district?
   It depends. This is a district decision.

30. Can I participate if I'm working toward a special education SPED degree?
   Probably not. A special education endorsement usually takes more time to complete than this grant will support.

31. We have specialist positions (generally behavior interventionists) that require an associate’s degree. Would they be eligible for the Paraeducator-to-Teacher model even if they haven't completed the specific paraeducator endorsement?
   No. Only districts are eligible for the grant. However, if their district is awarded a grant, the specialists may participate.

32. In reference to "must be hired as a registered apprentice," does this mean we should wait to apply for a position until we are approved, or do we need to have a position before applying?
   The school district has to apply. The grant is not for individuals.

33. The information states you need to have a paraeducator certification to do the Paraeducator-to-Teacher option, but most paraeducators in our area do not because it isn't required for any districts in our area. Our AEA has a three-course paraeducator program starting in May. Can we apply and show we are registered for those classes? I also thought I heard someone say earlier that you don't need to have the paraeducator certification if you have an AA degree. Can you confirm?
   Individuals do not qualify or apply for a TPRA grant; only districts may apply (see the previous Award Eligibility section).

   Your district may require a paraeducator certificate to be paid as a paraeducator. Check with your district.
General Grant Design

34. What type of teacher certification will the apprentices be available to obtain? For example, high school teachers have more content-specific requirements for their endorsements.

   It is designed for a general education initial license. It is intended to include elementary generalists and high school generalist teachers.

35. Couldn't all districts receive a certain number based on size perhaps rather than compete for the grants?

   The IDE and IWD will award the grants on a competitive basis for two primary reasons:
   
   - District interest and preparedness for implementation varies statewide.
   - If the state were to disburse the $9 million reserved for this program to all districts on a formula basis (instead of on a competitive basis), the median district allocation would be approximately $20,000 (depending on the formula used). This amount would be insufficient for an individual to complete the program.

36. Why don't we just have each of our regional community colleges head these programs, and we partner with them? This 10-student limit takes most rural schools right out of consideration.

   Please see the previous question response. To clarify, rural schools do not need to have 10 students by themselves; they may partner with one or more employer sponsors to achieve the minimum number for a cohort. We need 10 students to ensure that the courses will be offered when needed. If any small schools have difficulty finding partners for applications, please just contact us so we can assist.

37. Will an individual be hired as a registered apprentice or paraeducator?

   Both. The registered apprentice will be employed as a paraeducator.

38. Did the task force look at adults who already have a bachelor's or master's degree but just do not have the courses that would credential them as teachers?

   Yes. The task force decided to go in this direction.

39. Anticipating 100 individual participants, how many districts are likely to obtain this grant? What's the expected number of awards?

   We don't know how many will apply from various sizes of schools, but we intend to award grants equitably across the state, regardless of district size.

40. Is there any emphasis on hard-to-fill positions such as special educators?

   This grant program is designed to fill initial license areas; most special education endorsements will not fit that design. Outside of the funding of the grant, a partnership can include special education.

41. Will there be a pathway for experienced paraeducators who do not have an associate's degree?

   The High School and Adult-to-Paraeducator pathway will work for paraeducators who do not have an associate's degree.
Program Requirements, Student Teaching Hours, and Credits

42. What are the program requirements?
An employer sponsor (public school district registered with the U.S. Department of Labor's Office of Apprenticeship) meeting the minimum registered apprentice cohort must:

- Provide IWD a memorandum of understanding (MOU) proving that it is partnering with an eligible Iowa community college and/or four-year college or university (see #4 for all requirements) to create or expand an existing registered apprenticeship program.
- Hire or currently employ high school students or non-certified paraeducators as registered apprentices.
- Seek reimbursement of funds on a quarterly basis by June 30, 2024. Any unexpended grant dollars must be returned to IWD thereafter.
- Provide detailed reports to IWD by December 31 of each year in IowaWORKS.

43. Assuming school districts will have to go through the regular approval process for these apprenticeships through the US Dept of Labor?
Yes. IWD can help provide the support to get all requirements in place prior to submitting your application to the IWD Office of Apprenticeship for approval.

44. Can the related training instruction portion be online?
Yes. The related training instruction (RTI) portion of the registered apprenticeship can be online.

45. Do we have to be in the community college area like they must be for concurrent courses? I am asking because we are in NIACC's area, but Iowa Central is offering.
No. Courses can be online.

46. Is the service commitment for adults after completion of the program three years in Iowa or three years in the school they've been working in during their apprenticeship?
The requirement is three years in Iowa and does not mean the adult must work in their current school while in this program.

47. What's the minimum number of apprentices required?
The minimum number of apprentices required in each cohort is 10. Employer sponsors unable to achieve the minimum number for a cohort are encouraged to partner with another district close in proximity.

48. Is there a maximum number of apprentices?
No. There is not a maximum number of apprentices that may participate.

49. Would 60 hours of college credit be considered equivalent to an associate's degree if a paraeducator does not have an official associate's degree?
Yes. Sixty hours of college credit will be considered equivalent to an associate's degree if the paraeducator does not have an official associate's degree.

50. Does the career replace the "observation" and "student teaching" aspects? If so, how many hours of work are we required to work per week? Our district does 6.75 hours per day for paraeducators – would that fulfill the hours required?
Yes. The apprenticeship may replace the observation and student teaching aspects. Yes, a schedule of 6.75 hours per day for paraeducators will fulfill the hours required.
51. Are the districts required to find the classes, or will the classes be offered online for students?
   This will be established in the partnership.

52. Do students need to meet the requirements of their partner institution’s approved teacher preparation program?
   Yes. A partner institution in the Paraeducator-to-Teacher pathway must recommend the student for a teaching license, so their requirements must be met.

53. Who decides if the coursework agreed upon meets the standard?
   The IDE and IWD will decide if the coursework meets the standard.

54. Is there a list of competencies or standards for the apprenticeship program?
   Yes. They are now posted on the grant information page on the IowaGrants website.

55. How do student teaching hours work with an apprenticeship?
   If properly managed and monitored, registered apprenticeship paraeducator hours can count for student teaching.

56. Do the high school juniors receive district credits in other core areas toward their graduation requirements as they work as a classroom aide?
   Yes. High school juniors receive district credits in other core areas toward their graduation requirements.

57. Are the required credit hours for the Paraeducator-to-Teacher program participants the same full course load that a traditional student would be required as a full-time student?
   A person must meet the required hours for the degree. The grant is designed to pay for full-time tuition. The partnership can determine the number of course credits involved.

58. Will these candidates also need to take and pass the Praxis II exams to get their license at the end of the registered apprenticeship (e.g., program completion requirements)?
   Yes. Candidates must take and pass the Praxis II exams to get their license at the end of the registered apprenticeship.

Applying, Evaluating, and Awarding TPRA Grants

59. What are the application requirements?
   An employer sponsor must submit its application electronically via IowaGrants.gov by Monday, April 15, 2022, at 3:00 pm Central Time. IWD recommends that applicants create an account and begin the application in advance of the deadline. For additional guidance on applying, refer to the Notice of Funding Opportunity.

60. If the district has not created a registered apprenticeship program with IWD yet, can they still apply for the grant?
   Yes. A school district that has not created a registered apprenticeship program yet can still apply for the TPRA grant.
61. Is the minimum cohort of 10 required for both models, or can we do it with just one or two people if we go through the area education agency (AEA)?

Yes. The minimum cohort of 10 applies to both models. Part of the program is to earn a degree. An accredited community college, four-year college, or four-year university in Iowa is required to award college credit. An AEA cannot do so.

62. Can small school districts partner with multiple districts to meet 10?

Yes. Small school districts can partner with multiple districts to meet the minimum cohort of 10.

63. If several districts form a consortium to meet the minimum cohort of 10 apprentices, would each district apply for the grant?

No. One district would lead the consortium and apply for all participants. If awarded, the lead district will serve as the consortium’s fiscal agent and seek reimbursements on behalf of the group.

64. Does one application cover both the High School and Adult-to-Paraeducator (Teacher Aide 1) and Paraeducator-to-Teacher models?

Yes. The district can apply for one or both models within a single application.

65. Does the TPRA grant application have to be completed in one sitting or can the district start and return to the application at a later time?

You can return later.

66. Do you have a .pdf version of the application for reference?

If you go into IowaGrants, you can print the screens (or save as PDF) that way you have the application areas available to write before entering info in the actual application online.

67. Is there a list of the school districts that have already expressed interest or already have registered apprenticeships or is there somewhere you can find a list of districts/schools that have applied for the program?

No. There is no such list.

68. Would an application reaching more than 10 apprentices be more competitive?

The award guidelines and grant scoring information are on pages 8 and 9 of the Notice of Funding Opportunity.

69. If we complete the Iowa Grant Application now, when will we find out if we are awarded the grant?

May of 2022.

70. How will the grants be awarded?

It is a competitive grant, with awards determined by IWD. See the Notice of Funding Opportunity document for more information.

71. If awarded the grant, what timeline do we have as a public school to be approved as a registered apprenticeship?

Grantees must be in a registered apprenticeship program by the beginning of the school year or prior to the start of apprentices.
Allowability of Expenses

72. What can the funds be used for?

Grant funds must be used to reimburse employer sponsors for RTI tuition and employee wages. Grantees are required to comply with the use of funds requirements of the ARP Act of 2021’s ESSER III Fund. Additional detail by model is provided in the table below.

<table>
<thead>
<tr>
<th>High School and Adult-to-Paraeducator/Teacher Aide</th>
<th>Paraeducator-to-Teacher</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duration</td>
<td>Two years.</td>
</tr>
<tr>
<td>Tuition</td>
<td></td>
</tr>
<tr>
<td>Yearly Tuition &amp; Fees</td>
<td></td>
</tr>
<tr>
<td>Tuition &amp; Fees</td>
<td></td>
</tr>
<tr>
<td>Paraeducator program tuition and fees: $7,000 per year for up to three years at an accredited community college in Iowa.</td>
<td>Teacher preparation program tuition and fees: $17,000 per year for up to two years at an accredited public or private four-year college or university in Iowa.</td>
</tr>
<tr>
<td>Subtotal</td>
<td>$21,000</td>
</tr>
<tr>
<td>Salary</td>
<td></td>
</tr>
<tr>
<td>Hourly Rate*</td>
<td></td>
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<tr>
<td>For a high school student working as a classroom aide—</td>
<td>For a paraeducator working in the district and completing teacher preparation coursework is $6 per hour (50% of salary).</td>
</tr>
<tr>
<td>• $12 per hour (100% of salary) while in school and</td>
<td></td>
</tr>
<tr>
<td>• $6 per hour (50% of salary) after graduation and while completing paraeducator coursework after graduation.</td>
<td></td>
</tr>
<tr>
<td>For an adult working as a paraeducator while completing their paraeducator coursework is $12 per hour (only $6 per hour may be funded with the TPRA grant).</td>
<td></td>
</tr>
<tr>
<td>Hours Per Week &amp; Duration</td>
<td>Up to 30 hours per week for up to 36 weeks.</td>
</tr>
<tr>
<td>Yearly Total</td>
<td>~$6,500 per year for up to three years.</td>
</tr>
<tr>
<td>Subtotal</td>
<td>$19,500</td>
</tr>
<tr>
<td>Maximum Amount</td>
<td>$40,500 per participant.</td>
</tr>
<tr>
<td>Maximum Amount</td>
<td>$47,000 per participant.</td>
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</tbody>
</table>

*$12 per hour is based on the average paraeducator salary.
73. Does a district have flexibility on Paraeducator-to-Teacher registered apprentices' salaries and benefits if it does not exceed 50% of their salary and grant funds will not exceed $47,000?
   Yes. The district has such flexibility.

74. If we work full-time, do we still qualify for benefits from our school district?
   It depends. Benefits are provided by the district, so this is up to the district to decide. Please ask your district.

75. Would currently employed paraeducators keep their current pay?
   It depends. The employing district determines whether the employed paraeducator will keep their current pay.

76. How does this program tie into the IRS limit of $5,250 for tuition reimbursement for employees to make the contribution non-taxable to the employee?
   Annual tuition over $5,250 is taxable personal income unless it is excludable as a working condition fringe benefit. One of the conditions that make tuition not a "working condition fringe benefit" is if the tuition "is part of a program of study that will qualify the employee for a new trade or business." A cautious reading of Internal Revenue Service (IRS) precedent shows that TPRA participation will qualify an individual for a "new trade or business." From IRS Private Letter Ruling 8324068 (1983):

   The Tax Court has adopted a "commonsense approach" in determining whether an educational expenditure qualifies a taxpayer for a new trade or business. Davis v. Commissioner, 65 T.C. 1014, 1019 (1976); Glenn v. Commissioner, 62 T.C. 270, 275 (1974). If the education qualifies the taxpayer to perform significantly different tasks and activities than he or she could perform prior to the education, then the education qualifies him or her for a new trade or business. Glenn v. Commissioner; Weiszmann v. Commissioner, 52 T.C. 1106, 1112 (1969) affd. per curiam 443 F.2d 29 (9th Cir. 1971).

   For education expenses to be nondeductible under section 1.162-5 of the regulations, it is sufficient that the education leads towards qualifying the taxpayer for a new trade or business. It is not necessary to actually satisfy every prerequisite for qualification in that new trade or business if the education pursued leads toward such qualification. Diaz v. Commissioner, 70 T.C. 1067, 1076 (1978), affd. 607 F.2d 995 (2d Cir. 1979).

77. Are support salaries (like a lead teacher/mentor) an eligible expense?
   Not specifically.

78. Can the High School-to-Pareducatior/Teacher Aide 1 pathway be combined with Senior Year Plus programming? In particular, could the districts get reimbursed the cost for payment to community colleges for these courses?
   TPRA has funding for students participating in these apprenticeship programs. This funding cannot be utilized to pay for Senior Year Plus courses that fall outside the apprenticeship model and its requirements but can be used for courses within the apprenticeship framework.

79. If a student is teaching where they work, can they get paid by their district while they are student teaching?
   Yes. The grant will help the district support the student's paraeducator salary while student teaching but, again, the grant is awarded to the school district and not to any individual.
80. Is the district paying the tuition or reimbursing the student or paraeducator?
   It depends. This decision is left to the district to determine.

**Miscellaneous**

81. How do the certification requirements change or stay the same in terms of the competencies required for various endorsements?
   There are no anticipated changes to Iowa Code or rules.

82. Are there any proposed rule changes to Iowa Administrative Code chapter 79 or chapters 13 or 14 in terms of required number of hours of content area coursework or field experience or student teaching?
   No. No changes are anticipated.

83. Is this something the Iowa Workforce Development and/or State of Iowa will continue once ESSER funds are discontinued?
   Maybe. This program is a pilot to inform future related projects.

84. Any way for people to earn substitute training funds?
   No. This is not a part of the grant program.

85. What types of FERPA considerations and paraeducator placement options do we need to consider when students are working with students as a support?
   This is a district-determined answer.

**Guidance and Additional Questions**

If you have questions, please contact Larry Bice at larry.bice@iowa.gov and/or Kris Byam at kristopher.byam@iwd.iowa.gov.

For additional guidance and the latest information on the TPRA Grant Program please see the Iowa Department of Education's Future Ready PK-12 webpage and Iowa Workforce Development's Earn and Learn website.