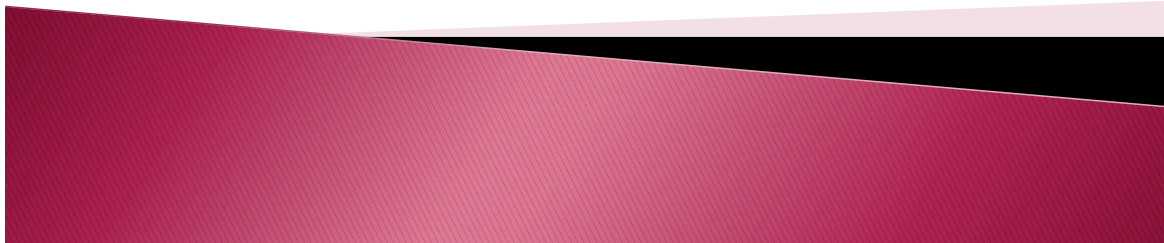


# NASTID New Directors Workshop

## July 23, 2014

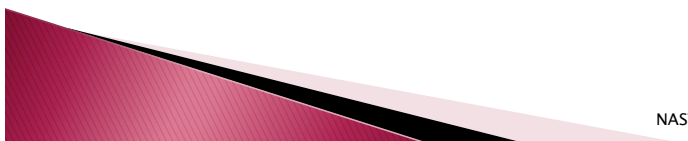
### Title I Must-Knows

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## Title I Must-Know Topics

- ▶ Schoolwide & Targeted Assistance Models
- ▶ Identifying Eligible and Served Title I Schools
- ▶ Fiscal Issues
  - Supplement, not Supplant
  - Comparability
  - Maintenance of Effort



# Title I, Part A

- ▶ Purpose – to increase the achievement of all students, particularly those who are low-performing and at-risk of not meeting standards
- ▶ Title I–A funding is provided to high poverty schools
  - Title I–A funds are *supplemental* to state and local funding
  - Title I schools must receive their share of comparable state and local funding
- ▶ Two types of Title I programs:
  - Targeted Assistance
  - Schoolwide

# Targeted Assistance Program

- ▶ Any school eligible for Title I–A funds may operate a targeted assistance program
  - Schools at or above average LEA percent of poverty or 35% (with some exceptions)
- ▶ Services are “targeted” and provided only to identified eligible students
- ▶ Services must be *supplemental* to regular educational services that all students would otherwise receive
- ▶ School *must* select some students for services
  - school *may not* provide targeted services to all students in the school even if they are all low-achieving.

# Targeted Assistance Eligibility

- ▶ Students eligible for targeted services from Title I–A are:
  - Students who meet academic criteria determined by school
  - Students who are “categorically” eligible for services including homeless students & students in local neglected or delinquent institutions
- ▶ All students who are eligible for other programs, such as migrant or English learners, must receive services under Title I–A that they qualify for first, then receive additional supplemental services from Title I–C or III–A

# Targeted Assistance Plan

- ▶ School must have *multiple* academic criteria to determine students eligible for Title I–A services such as:
  - below proficient on state assessments
  - below target on universal screening assessments
  - lack of progress in coursework
  - teacher recommendations
- ▶ Criteria for selecting students and plan for services to be provided should be documented

# Targeted Assistance Services

- ▶ Examples of targeted services that may be provided for students with I–A funds
  - In-class support by a paraprofessional or teacher
  - Pull-out support by a paraprofessional or teacher
  - Tutoring
  - Before/after school programs
  - Summer school
- ▶ Title I–A funds may not be used in a targeted assistance school to pay for the cost of screening assessments that are used to determine which students will qualify for Title I targeted services
- ▶ Professional development may be provided to staff to improve performance of Title I identified eligible students
  - Teachers directly funded by Title I–A
  - Any teachers in the school that teach Title I students, even if not funded directly by Title I–A
  - Paraprofessionals funded by Title I–A

# Targeted Assistance Reporting

- ▶ Only staff directly supported by I–A funds (in whole or in part) are considered Title I staff (teachers, paraprofessionals)
- ▶ Only students who receive services are counted as Title I students for reporting purposes
- ▶ Must track types of services provided to eligible students

## Schoolwide (SW) Program

- ▶ A Title I school is eligible to operate a schoolwide program when the student poverty level is at or above 40 percent.
  - LEAs must notify schools and parents of SW eligibility
- ▶ A schoolwide program is designed to help overcome the link between high poverty and low achievement.
- ▶ A comprehensive schoolwide plan is designed to raise the achievement of *all* students and especially of low-achieving students.

## Title I SW Plan Development

- ▶ The plan must be developed in consultation with the LEA and its support team (and other technical assistance providers, if applicable).
- ▶ The plan must be developed with the involvement of parents, community members, and individuals who carry out such a plan, including teachers, principals and administrators.

# SW Plan Required Components

Section 1114(b)(1) of ESEA requires:

1. A comprehensive *needs assessment* of the entire school based on information that includes the performance of *all* children in the school in relationship to the state's academic achievement standards, including the needs of students in low-performing subgroups (racial/ethnic, students with disabilities, English learners, migrant students).

## SW Plan Required Components p.2

2. *Schoolwide reform strategies that:*
  - a. Provide opportunity for all students to meet the state's proficient and advanced levels of student achievement and address the needs of all students in the school.
  - b. Use effective methods and research-based instructional strategies that:
    - i. Strengthen the *core academic program* in the school;
    - ii. Increase amount and quality of learning time (before/after school, summer, enriched & accelerated curriculum);
    - iii. Include strategies for meeting the needs of historically underserved and *low-performing* student populations.

## SW Plan Required Components p.3

3. Instruction by *highly-qualified teachers* and qualified paraprofessionals.
4. High quality and ongoing *professional development* for teachers, principals, and paraprofessionals (and other staff, if appropriate).
5. Strategies to *recruit and retain* high quality, highly-qualified teachers to high-need schools.
6. Strategies to increase *parent engagement*, such as family literacy services and involvement of parents in planning, review and improvement of schoolwide program.

## SW Plan Required Components p.4

7. Plans for assisting preschool children in the *transition* from early childhood programs to local elementary school programs.
8. Measures to include teachers in the *use of academic assessments* to provide information on, and to improve, the academic achievement of individual students and the overall instructional program.

## SW Plan Required Components p. 5

9. Provide *additional support* through activities to ensure that students who experience difficulty mastering the proficient or advanced levels of academic achievement standards are provided with effective, timely, additional assistance.
10. *Coordination and integration* of federal, state and local services and programs including programs related to Title I, violence, nutrition, housing, Head Start, adult education, vocational and technical education, and job training.

## Schoolwide Planning Cycle

1. Conduct a comprehensive needs assessment.
2. Develop the initial schoolwide plan usually over the period of one year (but may be shorter if LEA agrees).
3. Implement the plan.
4. Update the needs assessment, evaluate the plan to ensure that students demonstrate increased achievement, and modify the plan based on this data (ideally on an annual basis).

# Schoolwide Program Flexibility

- ▶ A schoolwide program has more flexibility than a targeted assistance program in the use of Title I funds and in the delivery of services.
- ▶ Title I *funding* is considered *supplemental* (not the *services*).
- ▶ Title I–A funds may be used to support *any component of the schoolwide plan*.

# Consolidating Funds in SW

- ▶ SW school *may* consolidate Title I–A with state, local and most other ESEA funds to upgrade entire educational program of school
  - School does not need to meet most specific program requirements *as long as it meets intents and purposes of those programs consolidated*
- ▶ Consolidated funds put into a “pool” and that pool is used to fund the SW program
  - School not required to maintain separate fiscal accounting by program to identify specific activities
  - Must identify all consolidated funding sources in SW plan and demonstrate that SW plan meets intents and purposes of programs for funds being consolidated

# “Conceptual” Consolidation

- ▶ Consolidation may be “conceptual”
  - In “conceptual” consolidation, funds may be used to support *any* educational component in the SW plan without regard to the specific program source
- ▶ Most ESEA programs may be consolidated to support SW plan
  - Some have restrictions (Title I–C, Indian Education, & IDEA)
  - If not consolidating funds from other ESEA programs, these funds must be used only for allowable purposes in the school
- ▶ See Section E of *Title I Fiscal Issues Non-Regulatory Guidance, February 2008* for specific questions  
[www2.ed.gov/programs/titleiparta/fiscalguid.doc](http://www2.ed.gov/programs/titleiparta/fiscalguid.doc)

# Use of Funds in SW Program

- ▶ If *consolidating*, may use any funds in consolidated “pool” for any component of educational SW plan
- ▶ If *not consolidating*, may use Title I–A funds for any component of educational SW plan
- ▶ *Targeted services* may still be provided directly to eligible students *in addition to* the services these students receive as part of the schoolwide program
  - Title I–C funds provide services to migrant students
  - Title III–A funds provide services to English learners (LEP) students

# Schoolwide Program Reporting

- ▶ All teachers and paraprofessionals are considered supported by Title I.
- ▶ All students are considered as served by Title I for reporting.
- ▶ Services to students do not have to be tracked and reported separately.

# SW Program Resources

- ▶ SW plan requirements are found in ESEA section 1114(b)(1)(A–J) & CFR 200.28.
  - *Designing Schoolwide Programs* (US ED Guidance)
  - *Title I Fiscal Issues February 2008* (US ED Guidance, Section E)
  - *Title IA ARRA (also Regular) Uses of Funds* (US ED Guidance)

# Title I Allocations to Schools

- ▶ Determining poverty rates
- ▶ Determining eligible schools and those that will be served with Title I:
  - Ranking & serving rules
  - 125% rule
  - Exceptions
  - Small LEAs
- ▶ Determine LEA set-asides
- ▶ Distribute funds to schools
  - See “LEA Identification and Selection of School... Guidance August 2003” at:  
[www2.ed.gov/programs/titleiparta/wdag.doc](http://www2.ed.gov/programs/titleiparta/wdag.doc)

## Poverty Data

- ▶ Type of poverty data must be same for all schools
- ▶ Most use free & reduced lunch qualification
- ▶ Currently:
  - Direct certification data provided to LEAs to determine students qualified for free lunch
  - Household applications needed to determine additional students who qualify for free lunch and those who qualify for reduced lunch
    - School collects annually, except in Provision 2 or 3 schools in which applications are only collected every 4 or 5 years
    - Community Eligibility Provision schools do not collect household applications (See guidance at [www2.ed.gov/programs/titleiparta/13-0381guidance.doc](http://www2.ed.gov/programs/titleiparta/13-0381guidance.doc))

## Determining Eligible Schools

- ▶ Include all public schools on the list of schools in the LEA
- ▶ Include school enrollment count and low-income count for each school to determine the percentage of poverty
- ▶ Subtract any LEA set-asides from the Title I allocation to determine amount of funding available to serve schools
- ▶ Determine which schools will be served with Title I funds
  - LEAs must follow ranking and serving rules, with some exceptions

## Ranking & Serving Rules

- ▶ Rank schools in order by poverty
  - All schools above the LEA poverty average or above 35% will be eligible to be served with Title I
  - All schools at 75% or above poverty *must be served with Title I-A funds*
  - LEA may determine the LEA “threshold” poverty rate above which it will serve schools
  - LEA may group and rank schools by grade span and serve a particular grade span
  - If *any* school is served that is below 35% poverty, must use 125% rule

# Skipping a School from Title I

- ▶ A school that is ranked as eligible to be funded with Title I funds may only be “skipped” or exempted from Title I funding if:
  - The school receives funding from *supplemental* state or local sources,
  - The funding is equivalent to what would have been received under Title I, and
  - The funding is used to provide a Title I-like program

# Small LEAs Exception

- ▶ Ranking and serving rules do not apply in these situations:
  - Single attendance area (a one-school LEA or one school per grade span) OR
  - LEA with enrollment < 1000
- ▶ Small LEAs may serve *any* school(s) as deemed necessary by the LEA without regard to the ranking and serving rules

## 125% Rule

- ▶ LEAs may, in some cases, serve schools with Title I that have less than 35% poverty
- ▶ 125% rule is required
  - Required minimum 125% PPA (per pupil amount) per school served is calculated by:
    - $\text{Total I-A allocation} \div \text{total \# of low-income students in LEA} \times 1.25$
- ▶ Purpose of 125% rule is to concentrate Title I funds in higher poverty schools for more effective programs

## Determine School Allocations

- ▶ Determine the allocations to each Title I school
  - The standard (or 100%) per pupil amount (PPA) is calculated by dividing the total *I-A amount available to schools by the total number of low-income students in the Title I schools being served*.
  - The standard PPA is a guide to determine how to fund each Title I school.
  - Schools served in rank order may be funded at different per pupil amounts (PPA) as long as higher poverty schools have = or > PPA
- ▶ Calculate school allocation by multiplying the # of low-income students x per pupil amount (PPA)

# School Title I Eligibility & Allocations

## ▶ Example

Col 1	Col 2	Col 3	Col 4	Col 5	Col 6	Col 7	Col 8	Col 9	Col 10	Col 11	Col 12
School Name	Grade Span	Title I Status	Total School Enrollment	Total Public School Low-Income Students	Total Private School Low-Income Students	Total Low-Income Students	Percent of Poverty (col 7/col 4)	Per Pupil Amount	Total Allocation (col 9 x col 7)	Public School Allocation (col 9 x col 5)	Private School Reserve (col 9 x col 6)
Hillside School	K-12	SW	137	74	12	86	62.8%	\$722	\$62,092	\$53,428	\$8,664
Town Middle School	6-8	TA	203	82	0	82	40.4%	\$580	\$47,560	\$47,560	\$0
Northside Elementary	K-5	TA	197	75	0	75	38.1%	\$550	\$41,250	\$41,250	\$0
All City High School	9-12	TA	268	79	17	96	35.8%	\$464	\$44,544	\$36,656	\$7,888
Valley School	K-12	NS	187	48	9	57	30.5%	\$0	\$0	\$0	\$0
Southside Elementary	K-5	NS	148	23	0	23	15.5%	\$0	\$0	\$0	\$0
						0			\$0	\$0	\$0
						0			\$0	\$0	\$0
						0			\$0	\$0	\$0
						0			\$0	\$0	\$0
						0			\$0	\$0	\$0
						0			\$0	\$0	\$0
						0			\$0	\$0	\$0
<b>DISTRICT TOTAL/AVERAGE:</b>			<b>1140</b>	<b>381</b>	<b>38</b>	<b>419</b>			<b>\$195,446</b>	<b>\$178,894</b>	<b>\$16,552</b>

## Fiscal Issues

- ▶ Supplement, not Supplant
- ▶ Comparability
- ▶ Maintenance of Effort

## Supplement, Not Supplant

- ▶ Federal funds must be used to “supplement, not supplant” services, staff, programs, or materials that would otherwise be paid with state or local funds (and, in some cases, other federal funds).
- ▶ Services provided with federal funds are *in addition to*, and do not replace or supplant, services that students would otherwise receive
- ▶ Always ask: “What would have happened in the absence of federal funds?”

## First Test of Supplanting

- ▶ An LEA may not use federal funds to provide services required under state, local or in some cases, federal law (as specified by particular program)
  - Title I is supplemental to state and local funds
  - Other programs such as Title III and CEIS are supplemental to state, local, and other ESEA programs

## Second Test of Supplanting

- ▶ An LEA may not use Title I funds to provide services that it provided in the prior year with non-federal funds
  - This test may be rebutted if an LEA can demonstrate that it would not have continued to provide the service in question because of a budget shortfall or changing educational needs

## Third Test of Supplanting

- ▶ An LEA may not use Title I funds to provide services for children participating in a Title I program that it provides with non-federal funds to non-participating children or to children in non-Title I schools
  - All Title I schools must receive their *comparable* share of state and local funds
  - Supplanting considerations are broader and consider all services provided by LEA for teachers and students in non-Title I schools as well as specific comparability calculations

# Consider LEA School Types

- ▶ Types of schools in LEA = most important supplement, not supplant consideration for use of Title I funds
  - If all schools are Title I operating schoolwide programs:
    - Title I funds are supplementary to other funds and may be used to support any components of SW plans, as long as all Title I schools receive comparable services
    - May provide services LEA-wide that would benefit all teachers or students
  - If all schools in LEA are Title I, but some (or all) operate targeted assistance programs
    - Title I funds must be used to provide *supplementary services* for eligible teachers or students, not services that would benefit all teachers or students in the LEA

## LEAs with some non-Title I schools

- ▶ Some schools in the LEA are Title I, but some are non-Title I
  - ▶ LEAs may *not* provide services LEA-wide that would benefit all teachers or students
  - ▶ It is possible that some services may be provided to teachers or students in a certain grade span of schools *if all schools in the grade span* are operating Title I schoolwide programs
    - ▶ For example, if all elementary schools (grades K-6) are Title I SW schools and no middle or high schools are Title I, the LEA could provide professional development to all elementary teachers or provide a new K-6 math curriculum with Title I funds. No Title I funds could be used to provide services to middle school or high school teachers.

# Comparability

- ▶ An LEA may receive Title I Part A funds only if it uses state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in non-Title I schools.
- ▶ Reasonable variance of 10% is ok: 90% to 110% is the range

# Comparability p. 2

- ▶ Does not apply if enrollment is less than 1,000.
- ▶ Does not apply if only one school per grade span.
- ▶ Determination must be made annually.
- ▶ Can exclude “Title I like programs.”

## Comparability p. 3

- ▶ If a discrepancy of more than 10% is found, the LEA must make adjustments immediately or no later than the start of the second semester.
- ▶ This could mean staff transfers or hiring of additional staff with state or local funds, adjusting funds, etc.
- ▶ The two main ways that districts determine comparability are: student–staff ratio and per–pupil expenditures.

## Maintenance of Effort (MOE)

- ▶ An LEA (local educational agency or district) may receive funds only if the SEA (state educational agency) finds the combined fiscal effort per student or the aggregate expenditures of the LEA from state and local funds from preceding year not less than 90% of second preceding year.

## Maintenance of Effort p. 2

- ▶ Federal funds are excluded.
- ▶ The SEA must analyze the LEA's expenditures from both state and local funds to determine MOE
- ▶ Fiscal effort per student may be run three ways: by Average Daily Attendance (ADA), Enrollment, and Average Daily Membership, whichever demonstrates maintenance of effort for the LEA.

## Maintenance of Effort p. 3

- ▶ If an LEA fails to make MOE, the SEA must reduce amount of allocation in the exact proportion by which the LEA fails to maintain effort below 90%.
- ▶ SEA must reduce all applicable ESEA (Elementary and Secondary Education Act) programs, not just Title I.
- ▶ The target for the next year is the 90% figure, not the actual expenditure level.

# MOE Sample Chart

Grant Year	Expenditures: 1 <sup>st</sup> preceding year	Expenditures: 2 <sup>nd</sup> preceding year	Level to meet 90% of column 2	Reduction in LEA allocation	Amount Title I allocation reduced
2011-12	\$850,000 (FY 2010)	\$1,000,000 (FY 2009)	\$900,000	5.6% (\$50,000/ \$900,000)	(\$100,000 award base) \$5,600
2012-13	\$810,000 (FY 2011)	\$900,000 (90% of FY 2009 instead of FY 2010)	\$810,000	No reduction	\$94,400
2013-14	\$800,000 (FY 2012)	\$810,000 (FY 2011)	\$729,000	No reduction	\$94,400
2014-15	\$700,000 (FY 2013)	\$800,000 (FY 2012)	\$720,000	2.8% (\$20,000/ \$720,000)	\$2,643 reduction to \$91,757