

Title I, Part A Neglected Reservation Frequently Asked Questions (FAQ)

This document is a list of frequently asked questions (FAQs) regarding the Title I, Part A Reservation for students in local institutions for neglected children. The information in this document includes existing statutes, regulations, and program guidance available to the Wisconsin Department of Public Instruction (DPI).

What is a “local institution for neglected children”?

A “local institution for neglected children” is defined as a public or private residential facility, other than a foster home, that is operated for the care of children who have been committed to the institution or voluntarily placed in the institution under applicable State law, due to abandonment, neglect, or death of their parents or guardians.

According to the Wisconsin Department of Children and Families, residential institutions in Wisconsin that serve children in need of protection (CHIPS) fall under the Title I-D definition of local institutions for neglected children. This includes residential care centers, shelter care, and group home institutions in Wisconsin.

ESSA section 1432(4)(A)

Does the ESEA require an LEA to reserve Title I funds to support students in local institutions for neglected children?

Yes, if a local educational agency (LEA) has a local institution for neglected children within its boundaries then the LEA is required to reserve Title I funds to provide comparable Title I services to the students in the neglected institution. Those LEAs are required to reserve a sufficient amount of their Title I funds to provide comparable supplementary academic and support services to students in neglected institutions who may be enrolled in the LEA at any time during the school year.

A child who is residing in a neglected institution and attending any school in the LEA, or receiving academic services at the institution, is eligible for Title I services. If an LEA has a mix of Title I and non-Title I schools, the LEA may use the neglected reservation to provide comparable Title I services to students in neglected institutions that attend non-Title I schools.

ESSA sections 1113(c)(3)(A)(ii)

How can the Title I, Part A Neglected Reservation be used for students in local institutions for neglected children?

The Title I, Part A Neglected Reservation may be used to provide a variety of services to students in neglected institutions. In addition to providing academic services, such as reading interventions to assist students in neglected institutions to meet the state’s challenging academic standards, the reservation may be used to provide services that may not ordinarily be provided to other Title I students or are provided to students attending

schools that do not receive Title I, Part A funds. For example, an LEA may use the reservation to provide, where appropriate, services including, but not limited to—

- Carrying out high-quality education programs supporting youth in meeting the state academic standards. This can include but is not limited to tutoring programs, credit recovery or high school graduation supports, or other evidence-based interventions;
- Providing activities that facilitate the transition of such children and youth if they are moving between facilities or schools (e.g. increasing family engagement in transition by paying for transportation so parents can participate in transition team meetings or prerelease programming, paying for a transition specialist that works with youth in developing a plan and connects the student with available services;
- Coordinating health and social services so these students have the supports necessary for meeting the state academic standards. Examples include planning time and coordination time for meetings between service providers, professional learning for educators to coordinate solutions that are working for students, providing space and time after school for the students and their families to have access to services they might not have easy access to during the school day;
- Special programming to meet the student's academic needs, including vocational and technical education, career counseling, curriculum-based entrepreneurship education and assistance in securing of student loans or grants for postsecondary education;
- Providing mentoring and peer mediation;
- Transporting students placed in neglected institutions to and from their school of origin;
- Offering professional learning opportunities for school district staff in order to support the identified needs of youth in neglected facilities;
- Paying LEA staff to coordinate and collaborate with the local child welfare agency and neglected institution to develop systems to transfer data in order for transitions to be as least disruptive as possible on the youth's education.

To use the Title I, Part A Neglected Reservation, the services must be reasonable and necessary to assist students in neglected institutions to take advantage of educational opportunities. Title I, Part A funds shall only be used when funds or services are not available from other public or private sources that provide similar services for economically disadvantaged students in general.

ESSA section 1113(c)(3)(A)(ii); 1115(e)(2); and 2 CFR § 200.403(a)

How should an LEA determine the amount of funds to reserve?

The ESEA does not prescribe a specific amount of Title I, Part A funds that LEAs must reserve. However, the ESEA requires that the amount be sufficient to provide services to students in local neglected institutions. LEAs have three options and must choose which works best for them.

- An LEA may use a districtwide, per pupil amount for students in neglected institutions, if this approach yields a reservation amount that is sufficient for the LEA to meet these requirements. This may be a good option for LEAs with a small number of such students.
- An LEA may reserve a percentage of their total Title I, Part A allocation. This may be a good option for LEAs with a large number of such students.
- An LEA may determine its own amount that is reasonable and necessary to provide comparable Title I services to students in neglected institutions. This option requires LEAs to explain how the amount was chosen in WISEgrants.

DPI recommends LEAs conduct a needs assessment of youth in neglected institutions, or include this population specifically in the LEA's overall needs assessment, when determining a sufficient amount to reserve to support such students. As part of the needs assessment, LEAs should:

- Encourage Title I coordinators, administrators at local facilities for neglected youth, foster care points of contact, and youth and their family members (when appropriate) to work together to develop and implement a plan that identifies ways that Title I funds will support programs serving children and youths;
- Collect and share concrete data on the needs of children and youth in neglected facilities; and
- Ensure that the needs of students in neglected institutions are included in LEA and school improvement plans and not addressed as a separate issue.

The LEA does not need to create a new needs assessment process for working with the students in neglected institutions. The LEA can use similar needs assessment processes to what they include in their work with local private schools.

ESSA section 1113(c)(3)(B)

What if an LEA does not have a local institution for neglected children?

If an LEA does not have a local institution for neglected children, that LEA is not required to reserve Title I, Part A funds. Those LEAs have the option to reserve funds for students who may be enrolled in their LEA but reside in a neglected institution in another LEA.

The Title I, Part A Neglected Reservation may be used to cover the excess cost of transportation to and from the school of origin for youth living in neglected facilities. LEAs may have students residing in a facility for neglected youth in another district. In this situation, the student's district of origin is responsible for ensuring transportation to the school of origin and should share the additional costs for transportation with the LEA where the institution for neglected youth is located.

Are LEAs required to reserve funds to serve students in local institutions for delinquent children or students in neglected or delinquent community day school programs?

No, all LEAs have the option to reserve funds to provide comparable Title I services to students in local institutions for delinquent children, and students in neglected or delinquent community day school programs.

ESSA section 1113(c)(3)(A)(ii)