Overview of Title I, Part A

WASBO's Federal Funding Conference

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WISCONSIN DEPARTMENT OF
Public Instruction
Jill K. Underly, PhD, State Superintendent

Session Objectives

- Provide an overview of the laws and statutes regulating the funds.
- Explain how Title I, Part A funds are allocated to districts.
- Demonstrate how the funds are distributed to eligible schools.
- Discuss other issues regarding fiscal compliance.

ESEA and Title I, Part A

The purpose of this title is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

Title I, Part A funds are targeted to high-poverty school districts and provide supplementary education to students who are educationally disadvantaged or at risk of failing to meet the state standards.

20 USC 6301

Educational Equity

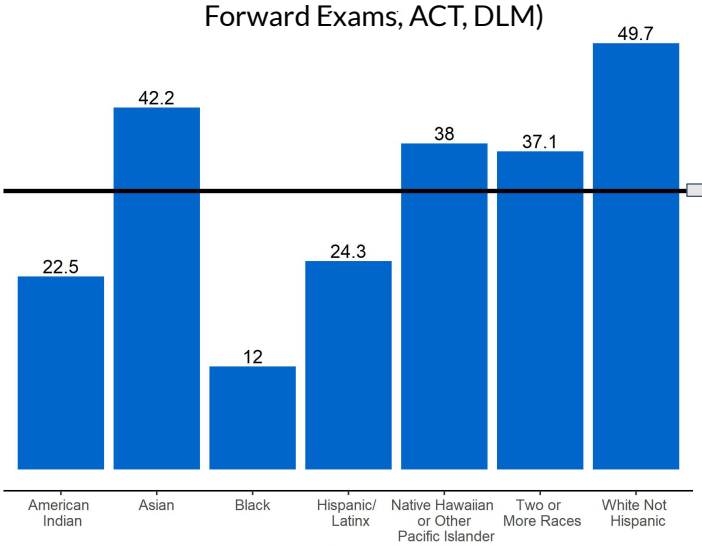
Educational equity means that every student has access to the educational resources and rigor they need at the right moment in their education across race, gender, ethnicity, language, ability, sexual orientation, family background and/or family income.

Adapted from the Council of Chief State School Officers
"Leading for Equity: Opportunities for State Education Chiefs"

It's not about poverty; it's about race.

2017-18 ELA Proficiency by Race, Non-ECD Students, Statewide (3-8th Grade Forward Exams, ACT, DLM)

White students experiencing poverty have higher proficiency rates than students of color not experiencing poverty.

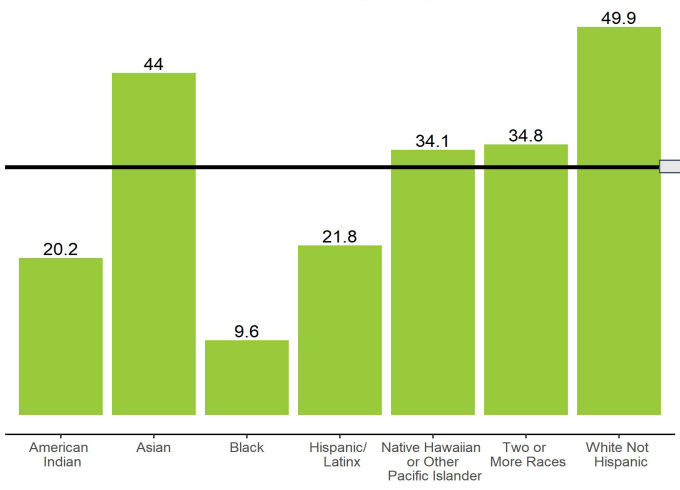


English language arts proficiency for economically disadvantaged white students

It's not about poverty; it's about race.

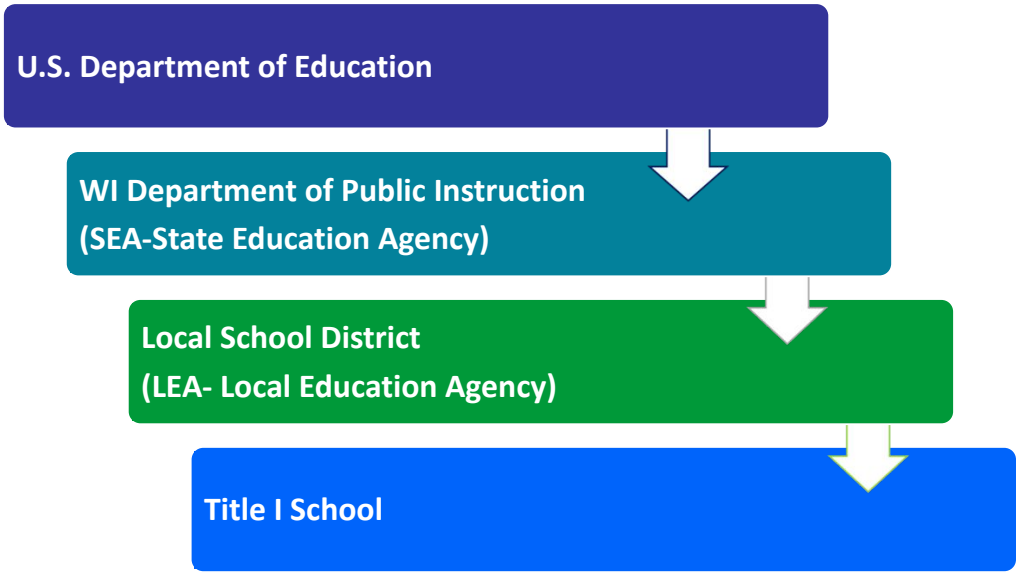
2017-18 Math Proficiency by Race, Non-ECD Students, Statewide (3-8th Grade Forward Exams, ACT, DLM)

Again, students of color who do not experience poverty have lower proficiency rates than white students who do experience poverty.



Mathematics proficiency for economically disadvantaged white students

Distribution of Funds



Allocation of Funds to LEAs

The formula is based on:

- **the state's average per pupil expenditure, and**
- **the count of children from low income families.**

US Census Bureau
Small Area Income and Poverty Estimates (SAIPE) are used to determine poverty.

20 USC 6333

Allocation of Funds to LEAs

LEA Poverty Percentage	Basic	Targeted	Financial Incentive	Concentration
15%	X	X	X	X
5%	X	X	X	
2%	X			

20 USC 6333

Determining Amount for Equitable Participation

Equitable participation for private schools is calculated from the total allocation first, before the LEA can use reservations or allocate funds.

Reservations

- **The LEA may take funds "off the top" of their allocation for various reasons before making per pupil amount allocations to public schools.**
- **Reservations are at the discretion of the LEA.**

20 USC 6313(a)(3)

Required Reservations

- **Homeless reservation:**
  - Required for all LEAs.
  - Used to provide equitable services to students experiencing homelessness at any time during the year.
- **Neglected reservation:**
  - Required for LEAs that have an institution for neglected children and youth within the LEA boundary.
  - Used to provide equitable services to children and youth in neglected institutions.
- **Family Engagement reservation:**
  - Required if the LEA allocation is greater than $500,000.
  - Must reserve one percent for family engagement activities.

20 USC 6313(c)(3) and 6318(a)(3)

Optional Reservations

Other reservations can include, but are not limited to:

- administrative costs,
- centralized services,
- professional development,
- services to eligible students who do not attend Title I schools (i.e. student in out-of-home care or migratory status), and
- additional resources for Title I Targeted Support Identification and Comprehensive Support and Improvement Identification.

Public and private reservations are taken separately.

20 USC 6313

Reservations

Reservations can be used to provide support to students experiencing homelessness even in non-Title I buildings or students residing in institutions for neglected youth.

Non-Title I School

Title I Schools

Reservations can be a way to effectively support multiple Title I schools with Title I funds.

Title I School Eligibility

School building eligibility is determined through ranking. The ranking is based on the number of children in poverty in an attendance area (school).

- Enrollment count for all public school students must be done on the same date.
- Enrollment count for private school students should be on a comparable date.

20 USC 6313

Title I School Eligibility

LEAs may use one of the following measures:

- Census data,
- National School Lunch Act data,
- W-2 data,
- Medicaid data, or
- A composite of the above measures.

Private schools do not have to use the same measures as the LEAs, but should use comparable measures.

$$\frac{\text{150 Students from Low Income Families}}{\text{300 Students in Total School Enrollment}} = \text{Percent Low Income 50\%}$$

20 USC 6313

Title I-A School Eligibility

- LEAs serve schools based on poverty data by rank order.
- LEAs must serve all schools with a poverty rate of 75% or higher.

An LEA is exempt from ranking if they have fewer than 1,000 students OR they have only one school per grade span.

20 USC 6313

Ranking Options

LEA's poverty average:
- All schools above the LEA poverty average are eligible.

35% Rule:
- All schools above 35% poverty are eligible.

Grade span grouping using the LEA's poverty average:
- Schools organized by grade span and all schools above the LEA poverty average are eligible.

Grade span grouping using the grade span's poverty average:
- Schools organized by grade span. Each group has a poverty average calculated, and all schools above the group poverty average are eligible.

20 USC 6313

Ranking Options

LEA Poverty Average	35% Rule	Grade Span Average	Grade Span LEA Average
Green Elementary 50% Poverty	Green Elementary 50% Poverty	Green Elementary 50% Poverty	Green Elementary 50% Poverty
Blue Elementary 30% Poverty	Blue Elementary 30% Poverty	Blue Elementary 30% Poverty	Blue Elementary 30% Poverty
Purple High School 25% Poverty	Purple High School 25% Poverty	Red Middle School 20% Poverty	Red Middle School 20% Poverty
Red Middle School 20% Poverty	Red Middle School 20% Poverty	Purple High School 25% Poverty	Purple High School 25% Poverty

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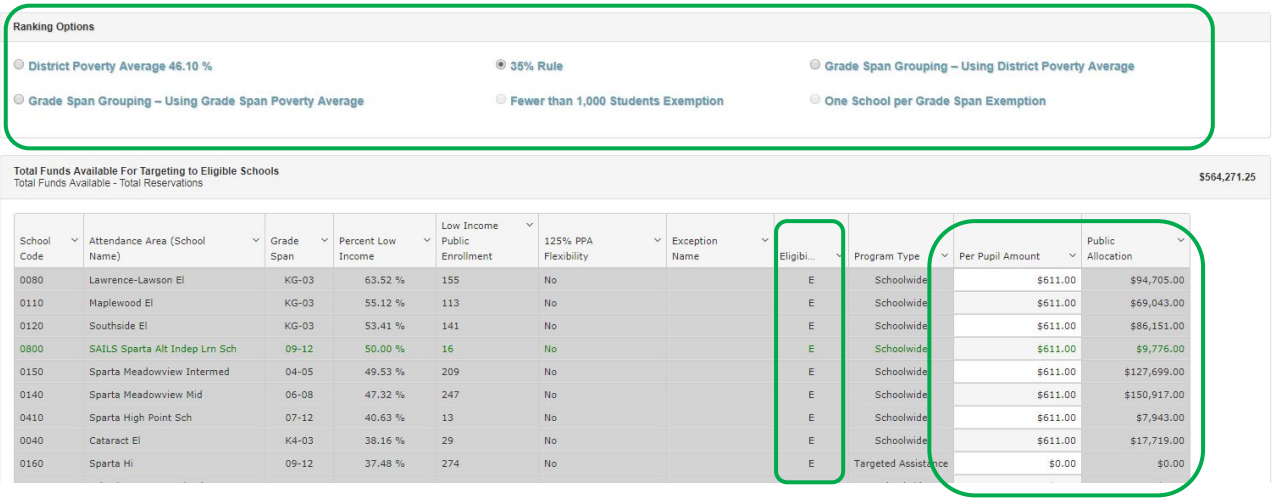
Ranking and Per Pupil Amounts



Ranking Options

- District Poverty Average 46.10 %
- 35% Rule
- Grade Span Grouping – Using District Poverty Average
- Grade Span Grouping – Using Grade Span Poverty Average
- Fewer than 1,000 Students Exemption
- One School per Grade Span Exemption

Total Funds Available For Targeting to Eligible Schools $564,271.25

Total Funds Available - Total Reservations

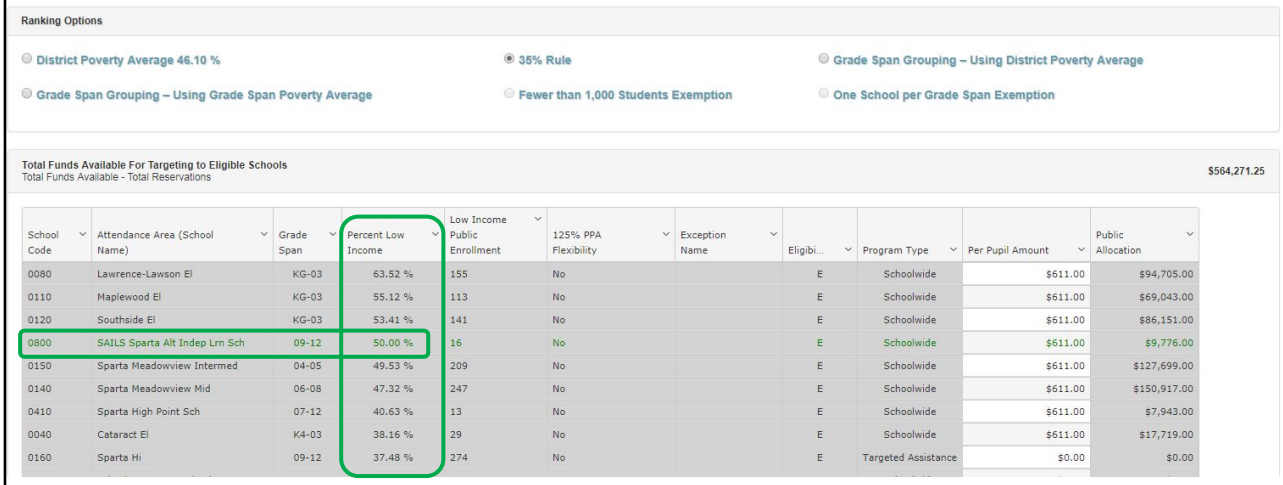
School Code	Attendance Area (School Name)	Grade Span	Percent Low Income	Low Income Public Enrollment	125% PPA Flexibility	Exception Name	Eligibi...	Program Type	Per Pupil Amount	Public Allocation
0080	Lawrence-Lawson El	KG-03	63.52 %	155	No		E	Schoolwide	$611.00	$94,705.00
0110	Maplewood El	KG-03	55.12 %	113	No		E	Schoolwide	$611.00	$69,043.00
0120	Southside El	KG-03	53.41 %	141	No		E	Schoolwide	$611.00	$86,151.00
0800	SAILS Sparta Alt Indep Lrn Sch	09-12	50.00 %	16	No		E	Schoolwide	$611.00	$9,776.00
0150	Sparta Meadowview Intermed	04-05	49.53 %	209	No		E	Schoolwide	$611.00	$127,699.00
0140	Sparta Meadowview Mid	06-08	47.32 %	247	No		E	Schoolwide	$611.00	$150,917.00
0410	Sparta High Point Sch	07-12	40.63 %	13	No		E	Schoolwide	$611.00	$7,943.00
0040	Cataract El	K4-03	38.16 %	29	No		E	Schoolwide	$611.00	$17,719.00
0160	Sparta Hi	09-12	37.48 %	274	No		E	Targeted Assistance	$0.00	$0.00

High School Ranking Exception

An LEA may serve a high school with a poverty rate between 50 and 75 percent before it serves other schools with a poverty rate at or below 75 percent.

20 USC 6313

High School Ranking Exception



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0150	Sparta Meadowview Intermed	04-05	49.53 %	209	No		E	Schoolwide	$611.00	$127,699.00
0140	Sparta Meadowview Mid	06-08	47.32 %	247	No		E	Schoolwide	$611.00	$150,917.00
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Determining Per Pupil Amounts

- **Per pupil amounts are determined for each public school.**
- **The same per pupil amount can be allocated for each eligible school:**
  - A higher poverty rate school may not receive a lower per pupil amount than a school that has a lower poverty rate (unless an LEA is exempt).
  - Lower per pupil amounts may be allocated for lower poverty rate schools.

20 USC 6313

Determining Per Pupil Amounts

Attendance Area (School)	Grade Span	Poverty Percent	Per Pupil Amount	Attendance Area Allocation
Red School 150 Low Income Students	K-5	50%	$1,000	$150,000
Blue School 100 Low Income Students	K-5	44%	$1,000	$100,000
Green School 300 Low Income Students	K-5	40%	$900	$270,000

Private School Equitable Participation

Private school per pupil amounts are determined based on the total number of low-income private school students residing in served public school attendance areas.

Title I services are designed to meet the needs of private school students as determined by the consultation.

- Title I services provided by the public school must supplement the private school's educational services (similar to a targeted assistance school).
- Title I services must be secular, neutral, and non-ideological.

The proportional share for all private schools participating in the LEA's Title I services is based on the LEA's total allocation and is determined before reservations.

- Private school allocations are based on the current enrollment for public and private schools attending served attendance areas in the previous year.

20 USC 6320

Private School Per Pupil Amounts

Example:

$13,000 private school proportional share

$1,000 private school reservations

$12,000 / 20 low income private students in served attendance areas = $600 private per pupil amount *regardless of which private school they attend or which served attendance area they reside in*

Private School	Low Income Enrollment 20-21 Served Attendance Areas	Title I-A Instructional Amount
Private School A	8	$4,800
Private School B	10	$6,000
Private School C	2	$1,200

Per Pupil Amounts

Public Schools

$1,000 Per Pupil Amount

$1,000 Per Pupil Amount

$900 Per Pupil Amount

Divided among schools according to ranking after reservations are taken.

Private Schools

$9,500 PPA

$9,500 PPA

$9,500 PPA

Divided equally among number of low income students after reservations are taken.

Types of Title I Programs

Targeted Assistance

Title I supplemental services are provided to a select group of children.

Eligible children – children identified with the greatest academic need (failing, or most at risk of failing) the state's academic achievement standards.

Schoolwide (SWP)

All staff, students, & resources are part of the Title I schoolwide program.

The SWP is a comprehensive reform strategy designed to upgrade the entire educational program in order to improve the achievement of the lowest achieving students.

Who are "Title I Eligible" Students?

Targeted Assistance

Title I students are identified through a multi-step process.

Schools must first use multiple academic measures to identify eligible students. Then schools rank students according to academic need.

Schoolwide (SWP)

All students are Title I students.

Schools are not required to rank students for services. The SWP upgrades the educational program for all students while addressing the needs of the lowest achieving students.

Allowable Costs

Is it allowable?

This is the most common question LEAs ask DPI and the most common question DPI consultants ask each other.

The answer is:

It depends

Title I, Part A Supplement not Supplant

LEAs are required to:

- Identify the methodology used to allocate state and local funds to Title I schools; and
- Demonstrate that these schools receive all of the state and local funds they would be entitled to, even if they were not Title I schools.

20 USC 6321(b)

Title I, Part A Supplement not Supplant

Most LEAs in Wisconsin are either completely exempt from having a methodology or may only need to have a methodology for certain grade spans.

An LEA is not required to have a methodology if:
- it has only one school,
- it has only Title I schools, or
- all of its grade spans are exempt.

A grade span is exempt if it contains:
- one school,
- only non-Title I schools, or
- only Title I schools.

US Department of Education. 2019. "Supplement not Supplant Under Title I, Part A of the Elementary and Secondary Education Act of 1965, as Amended by the Every Student Succeeds Act."

Title I Allowable Costs – School Level

1. **Did the school receive its full share of local/state funds based on the LEA's methodology?**
2. **Is the proposed budget item addressing the needs of Title I students?**
3. **Does the cost adhere to the Uniform Grant Guidance, EDGAR, and the LEA policies (Allowability checklist)?**

Allowable Costs & Needs

Targeted Assistance

Services for the needs of Title I students, parents, and educators.

Allowable costs must meet the needs identified for the Targeted Assistance program.

Schoolwide

Strategies identified through the Schoolwide Plan.

Allowable costs must support the comprehensive improvement efforts identified through the Schoolwide Plan.

Title I Allowable Costs – District Level

District Level Expenditures (Reservations)

1. **Did the LEA allocate state and local funds for districtwide initiatives without regard for Title I status?**
2. **Does the cost:**
   - **Meet the intents and purpose of Title I, Part A and**
   - **Adhere to the Uniform Grant Guidance, EDGAR, and LEA policies (Allowable Costs Checklist)?**

Additional Title I Fiscal Requirements

Maintenance of Effort

- To demonstrate state/local effort is maintained

Comparability

- To demonstrate that LEAs provide comparable state/local resources to Title I schools and non-Title I schools

20 USC 6321(a) and (c)

Grant Period & Carryover Policy

Fiscal Year: July 1 to June 30

LEA's Allocation* Less than $50,000	LEA's Allocation* Greater than $50,000
• No limit on carryover.	• LEAs may carryover 15% of the total allocation. • LEAs must apply for a waiver to carryover more than 15% of the total allocation. This is only allowed once every three years.

* Allocation plus any funds transferred to Title I, Part A

20 USC 6339

Technical Assistance

Title I Shorts

http://dpi.wi.gov/title-i/title-i-shorts

DPI's Title I Website

https://dpi.wi.gov/title-i

Resources from DPI that Promote Equity

- PEFA Report
- Family and Community Engagement in PEFA
- PEFA eCourse
- PEFA eCourse Facilitator's Guide
- Creating Safe and Healthy Environments for Immigrant and Refugee Youth
- Trauma Informed Modules
- McKinney-Vento Modules

Contacts

Title I Education Consultant Directory

http://dpi.wi.gov/title-i/consultant-directory

Title I Network Coordinators

https://dpi.wi.gov/title-i/network