

Title I, Part A Funding Back to Basics

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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.

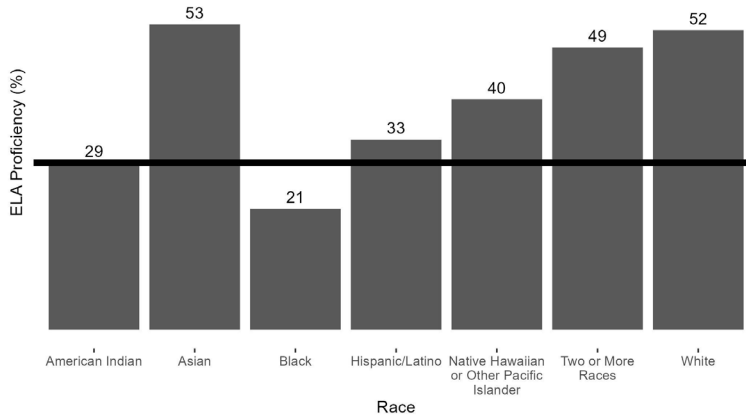
*Adapted from the Council of Chief State School Officers
"Leading for Equity: Opportunities for State Education Chiefs"*

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

Proficiency by Race, Statewide (3-8th Grade Forward Exams, ACT, DLM)

2021-22 Wisconsin ELA Scores
Non-ECD Students in Public Schools Statewide

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



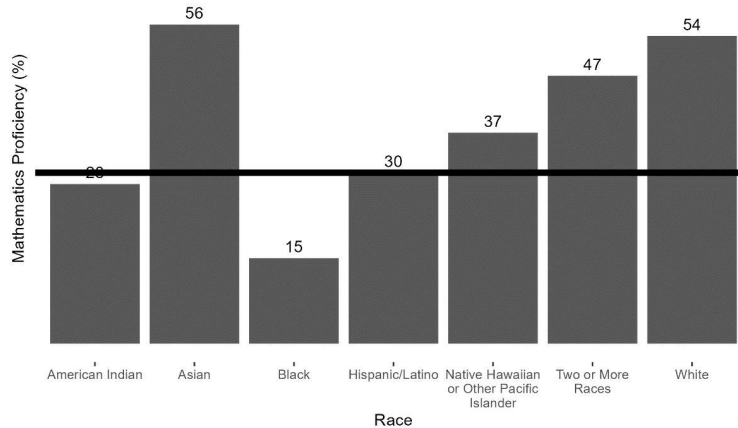
English language arts proficiency for economically disadvantaged white students

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

Proficiency by Race, Statewide (3-8th Grade Forward Exams, ACT, DLM)

2021-22 Wisconsin Mathematics Scores
Non-ECD Students in Public Schools Statewide

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

U.S. Department of Education

WI Department of Public Instruction
(SEA-State Education Agency)

Local School District
(LEA- Local Education Agency)

Title I School

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

Allocation of Funds to LEAs

	Basic	Targeted	Financial Incentive	Concentration
LEA Poverty Percentage				
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 an LEA's total allocation *before* reserving or allocating funds to its public schools.

Reservations

Support students experiencing extenuating circumstances who attend non-TI schools with TI funds.



Title I Schools

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

Reservations

- LEAs set-aside a part of their allocation for any required or other applicable authorized activities before making per pupil amount allocations to eligible public schools.
- Reservation amounts are at the LEA's discretion.

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's boundaries.
 - 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 (at least one percent).
 - Used to support family engagement activities.

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

Optional Reservations

Other available reservations include:

- Administration
- Centralized Services
- Professional Development
- Migrant, Delinquent, and Out-of-Home Care (*Reservations that support services to eligible students who do not attend Title I schools*)
- Preschool
- Financial Incentives (*specific for LEAs with TSI and CSI schools*)
- Indirect Costs

Public and private reservations are taken separately

- Private Reservation Options: Administration, Family Engagement, Indirect Costs

20 USC 6313

Title I School Eligibility

Title I 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.
 - * This includes any virtual schools.
- Enrollment count for private school students should be done 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.

When available, private schools must use the same measure as the LEA. If the same poverty measure isn't available, the selected measure must be comparable to the LEA's.

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

20 USC 6313

Title I 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

Ranking Options

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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
Total Funds Available - Total Reservations

\$564,271.25

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.

High School Ranking Exception

Ranking Options

District Poverty Average 46.10 %
 35% Rule
 Grade Span Grouping – Using District Poverty Average

Grade Span Grouping – Using Grade Span Poverty Average
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Determining Per Pupil Amounts

- Per pupil amounts are assigned to every eligible public school the LEA plans to serve with Title I funds.
- LEAs may allocate funds to each eligible school or allocate a higher amount of funds to the school(s) with the higher percentage of low-income students.
- An LEA determines the per pupil amount for each school, but:
 - Schools must be served based on rank order.
 - The same per pupil amount may be allocated to each school.
 - Schools with higher poverty rate cannot receive a lower per pupil amount than a school with a lower poverty rate (unless an LEA is exempt).

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

Per Pupil Amounts and School Allocations

Public School	Per Pupil Amount	School Allocation
Red School 150 Low Income Students	\$1,000	\$150,000
Blue School 100 Low Income Students	\$1,000	\$100,000
Green School 300 Low Income Students	\$900	\$270,000

The amount allocated to each school (the 'School Allocation') is the total amount of Title I funds available to support services within the school. An LEA should budget for schools based on how funds have been allocated on the TI Public Schools Eligibility screen.

Private School Equitable Participation

Title I services must meet the needs of private school students as determined by consultation. These services must:

- Supplement the private school's general education (similar to a targeted assistance school); and
- Be secular, neutral, and non-ideological.

The proportional share available for participating private schools is based on the LEA's total allocation and is determined before reservations.

- The private school-level allocations are based on the number of low-income private school students residing within served Title I public attendance areas (*each student meeting this criteria generates a per pupil amount*).

20 USC 6320

Private School Per Pupil Amounts

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

Example:

- An LEA as a private proportional share of \$13,000
- The LEA and private school have agreed to set aside \$1,000 under the Administration Reservation
- The private school has a total of 20 low-income students residing in TI served attendance areas

$\$12,000 / 20 \text{ low income private students in served attendance areas} = \$600 \text{ private per pupil amount}$

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

Public vs. Private Per Pupil Amounts

Public Schools

\$1,000 Per Pupil Amount

\$1,000 Per Pupil Amount

\$900 Per Pupil Amount

After reservations are taken out, LEAs assign a per pupil amount to eligible schools according to their rank order using poverty averages.

Private Schools

Private School A

Private School B

Private School C

\$600 PPA

\$600 PPA

\$600 PPA

After reservations are taken out, the private share is divided equally among the total number of low-income private to determine the per pupil amount used within *all* private schools.

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.

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

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
<ul style="list-style-type: none">• No limit on carryover.	<ul style="list-style-type: none">• 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

Technical Assistance

Title I Shorts: <http://dpi.wi.gov/title-i/title-i-shorts>

Deadlines and Fiscal Information: <https://dpi.wi.gov/title-i/fiscal-information>

- Determining Allowable Costs
- Supplement, not Supplant
- Carryover
- Comparability Report

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>