

# Title I, Part A

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**TITLE I, PART A**

**WASBO  
Federal Funding  
Conference**

**FEBRUARY 2015**

# Who's in the audience?

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- I'm not working on Title I yet, but I will have Title I responsibilities next year.
- 2014-15 was my first year working with Title I and the ESEA application.
- I've been working on Title I for more than a year but less than three years.
- I've been working on Title I for more than three years.

# Learning Objectives

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- 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; and
- Discuss other issues regarding fiscal compliance.

# ESEA and Title I, Part A

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- Elementary and Secondary Education Act (ESEA) of 1965.
- 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.

# Distribution of Funds

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U.S. Department of Education

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graph TD; A[U.S. Department of Education] --> B[WI Department of Public Instruction (SEA-State Education Agency)]; B --> C[Local School District (LEA- Local Education Agency)]; C --> D[Title I School];
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WI Department of Public Instruction  
(SEA-State Education Agency)

Local School District  
(LEA- Local Education Agency)

Title I School

# Allocation of Funds to LEAs

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- The formula is based on:
  - The state's average per pupil expenditure and
  - The LEA's 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

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LEA Poverty Percentage	Basic	Targeted	Financial Incentive	Concentration
	15%	X	X	X
	14.99%	X	X	
	5.00%	X	X	
	4.99%	X		
	2%	X		

# Reservations



- **Parent Involvement:**
  - Required if the allocation is greater than \$500,000.
  - One percent must be reserved for parent involvement activities.
- **Other Services:** Including, but not limited to centralized services, professional development, services to eligible students who do not attend Title I schools (i.e. homeless or migrant students), additional resources for Title I Focus and Priority Schools, etc.
- **Administrative Costs:** (Optional) Approved indirect rate + up to 10% of the allocation for direct administrative costs.



# Reservations

## Reservations Subject to Equitable Participation

The amount of reservations to be used for private schools is calculated on the Private School Equitable Participation Summary Report and may be viewed **after** eligible school allocation amounts are determined

Centralized Services:	\$ <input type="text" value="0"/>
Professional Development:	\$ <input type="text" value="0"/>
Parent Involvement: (Minimum 1% required if Title I allocation is \$500,000 or more. 95% of the 1% set aside must be distributed to schools.)	\$ <input type="text" value="0"/>
Reservations Subject to Equitable Participation Total:	\$ 0

## Reservations NOT Subject to Equitable Participation

Administration: (Include costs to administer and coordinate Title I services for both the public and private schools.)	\$ <input type="text" value="30,000"/>
Homeless:	\$ <input type="text" value="5,500"/>
Migrant:	\$ <input type="text" value="0"/>
Preschool:	\$ <input type="text" value="10,000"/>
Private School Carryover:	\$ <input type="text" value="0"/>
Reservations NOT Subject to Equitable Participation Total:	\$ 45,500

## Estimated Indirect Costs

Indirect Costs (Click [Here](#) to estimate indirect costs for entire budget.): \$

## Budget

Total Funds Available: \$ 419,478  
Total Reservations: \$ 52,200  
Funds Available for Targeting to Schools: \$ 367,278

# Title I School Eligibility

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- Based on the number of children in poverty in an attendance area (school).
- Includes children who attend private schools both inside and outside of the district and live in a school's attendance area.
- Enrollment count for all students must be done on the same date.

# Title I School Eligibility

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- LEAs may use one of the following measures:
  - Census data;
  - Free and reduced-price lunch data;
  - W2 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 a comparable measure.

# BLUE SCHOOL

**Public  
Enrollment  
447 Students**



**Private  
Enrollment  
84 Students**



**Total  
Enrollment  
531 Students**

**Low-Income  
Public  
218 Students**



**Low-Income  
Private  
8 Students**



**Low-Income  
Total  
226 Students**

**Low-Income  
Total  
226 Students**



**Total  
Enrollment  
531 Students**



**Percent  
Low-Income  
42.56%**

## Title I Enrollment Calculation

# RED SCHOOL

**Public  
Enrollment  
307 Students**



**Private  
Enrollment  
41 Students**



**Total  
Enrollment  
348 Students**

**Low-Income  
Public  
151 Students**



**Low-Income  
Private  
14 Students**



**Low-Income  
Total  
165 Students**

**Low-Income  
Total  
165 Students**



**Total  
Enrollment  
348 Students**



**Percent  
Low-Income  
47.41%**

## Title I Enrollment Calculation

# GREEN SCHOOL

**Public  
Enrollment  
180 Students**



**Private  
Enrollment  
7 Students**



**Total  
Enrollment  
187 Students**

**Low-Income  
Public  
76 Students**



**Low-Income  
Private  
2 Students**



**Low-Income  
Total  
78 Students**

**Low-Income  
Total  
78 Students**



**Total  
Enrollment  
187 Students**



**Percent  
Low-Income  
41.71%**

## Title I Enrollment Calculation

# Title I School Eligibility Ranking

LEAs serve schools in rank order based on poverty data.

LEAs must service all schools with a poverty rate of 75% or higher.

- ❖ An LEA's poverty average
- ❖ Grade Span Grouping Using the LEA's Poverty Average
- ❖ Grade Span Grouping Using the Grade Span's Poverty Average
- ❖ 35 Percent Rule
- ❖ Fewer than 1,000 Students Exemption
- ❖ Only One School per Grade Span Exemption

## Options to Rank Schools

# Determining Per Pupil Amounts

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- Per pupil amounts are determined for *each* school.
- The same per pupil amount can be allocated for each eligible school.
  - Lower per pupil amounts may be allocated for lower poverty schools.
  - A school *may not* receive a lower per pupil amount than another school that falls below it in rank order.



# Determining Per Pupil Amounts

Attendance Area (School)	Grade Span	% Low Income	Per Pupil Amount	Attendance Area Allocation
<b>Red School</b> 165 low income students	K-5	47.41%	\$502	\$82,830
<b>Blue School</b> 226 low income students	K-5	42.56%	\$501	\$113,226
<b>Green School</b> 78 low income students	K-5	41.71%	\$501	\$39,078

<input type="radio"/> District Poverty Average 51.51%	<input type="radio"/> 35% Rule	<input type="radio"/> Grade Span Grouping (Using District %)
<input type="radio"/> Fewer than 1,000 Students Exemption	<input checked="" type="radio"/> Grade Span Grouping (Using Grade Span %)	<input type="radio"/> Exemptions One School per Grade Span

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School	Grade Span	% Low Income	Exception	Eligibility	Program Type	Per Pupil Amount	Public Allocation	Private Allocation	Total Allocation
(0180) Al Behrman El	PK-05	77.27		E	Schoolwide	594.06	175,247.70	6,534.66	181,782.36
(0120) West El-KG Ctr	K4-KG	72.48		E	Schoolwide	590.09	46,617.11	0.00	46,617.11
(0110) Willson El	PK-05	53.55		E	Targeted Assistance School	535.50	90,499.50	6,426.00	96,925.50
(0060) East El	K4-05	50.58		E	Schoolwide	489.50	97,410.50	9,790.00	107,200.50
(0140) North Freedom El	K4-05	46.58		I	Targeted Assistance School	0	0.00	0.00	0.00
(0150) BELC	K4-K4	0.00		I	Targeted Assistance School	0	0.00	0.00	0.00
(0160) BELC--Renewal Head Start	K4-K4	0.00		I	Targeted Assistance School	0	0.00	0.00	0.00
(0020) Jack Young Middle School	06-08	51.06		E	Targeted Assistance School	0.00	0.00	0.00	0.00
(0040) Baraboo Hi	09-12	38.87		E	Targeted Assistance School	0.00	0.00	0.00	0.00

Allocated: 409,774.81 22,750.66 432,525.47

Available for Targeting (Includes Carryover): 432,526.00

Remaining Available for Allocated: 0.53

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Private School Equitable Participation Percentage: 5.48%

# Title I Equitable Services for Private Schools

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- Private School Amount for Services
  - (Low-income private school students) (the private school student's public attendance area per pupil amount) + the private school's share of reservations subject to equitable participation.
- 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)

# Targeted & Schoolwide Comparison

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## Targeted Assistance Program

- Supplemental instructional services
- **Specific students** who have been identified as failing
  - Not necessarily low-income students

## Schoolwide Program

- Comprehensive strategies
- **All students**
- Eligible schools must have 40 percent or more poverty

# Common Allowable Costs

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Budget items must address needs identified in the district's annual needs assessment. Common allowable costs include:

- Salary and Fringe Benefits of staff providing Title I services
  - Highly Qualified Teachers
  - Paraprofessionals
- Contracted costs of staff providing Title I services
- Instructional media and supplies
- Training/Travel for staff providing Title I services

# Is it allowed?

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

The answer is:

**It depends.**

Title I funds may only be used to ***supplement*** the instructional program offered in a school.

Title I funds must not ***supplant***, i.e. take the place of, other funds from non-Federal sources.

## Supplement not Supplant Targeted Assistance Schools

### Three “tests for supplanting”

1. Is the activity or expense required by state or local law or other federal law?
2. Was this activity or expense paid for by local funds in the past?
3. Does the LEA use local funds to provide a service to non-Title I students and Title I funds for the same service to Title I students?

Title I Schoolwide Schools do not need to provide services that supplement, and do not supplant the services participating students would otherwise receive if they were not participating in a Title I program.

*ESEA Section:  
1114(a)(2)(A)(ii)*

## Supplement not Supplant Schoolwide Schools

Three “tests to determine allowability”

1. Did the school receive its full share of local funds?
2. Is the proposed budget item addressing an educational need?
3. Is the proposed budget item meeting needs identified in the schoolwide plan?



# Other Financial Requirements

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- **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
- **Time and Effort**
  - To demonstrate that staff charged to the federal program actually worked on the federal program

# Grant Period & Carryover Policy

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Fiscal Year: July 1 to June 30

## LEA's Allocation\* Less than \$50,000

- There is no limit on the amount of funds that can be carried over from year-to-year.

## LEA's Allocation\* Greater than \$50,000

- LEAs may carryover 15% of the total allocation.
- LEAs must apply for a waiver to carryover more than 15% if the total allocation. This is only allowed once every three years.

\* Allocation plus any TII-A funds transferred to TI-A

# Claim Process

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- Use the ESEA Application to make claims online.
  - Claims are formatted to the PI-1086
  - Claim forms will reflect the most recently approved budget.
- Submit electronic claims at least quarterly (*encouraged*)
- Make a copy of the **final claim**, sign it and submit it to DPI.

# Contacts

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- Title I Education Consultant Directory
  - [http://titleone.dpi.wi.gov/t1consultant\\_dir](http://titleone.dpi.wi.gov/t1consultant_dir)
- Title I Network Coordinators
  - [http://titleone.dpi.wi.gov/ttlone\\_ti\\_network\\_staff](http://titleone.dpi.wi.gov/ttlone_ti_network_staff)