

Title I, Part A

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TITLE I, PART A

**WASBO
Federal Funding
Conference 2016**

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FEBRUARY 2016



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.
- 2015-16 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.

But What About ESSA?

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Every Student Achieves Act (ESSA)

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- ESEA was reauthorized as Every Student Succeeds Act (ESSA) on December 10, 2015.
- Consolidated Appropriations Act, 2016 (signed on December 18, 2015).
- Title I will continue to operate in the 2016-2017 school year under the plans, procedures, and requirements that are in place for the 2015-2016 school year.

Every Student Achieves Act (ESSA)

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- Julia Martin will provide an overview during a breakout session at 9:15 tomorrow.
- DPI is awaiting guidance from USDE for implementation regulations.
- 2016-17 DPI will develop and provide technical assistance to LEAs to implement ESSA in 2017-18.
- During the 2016-17 school year, LEAs must continue to follow the rules and regulations under NCLB.

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

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	X
14.99%	X	X	X	
5.00%	X	X	X	
4.99%	X			
2%	X			

Reservations - NCLB

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- **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 - NCLB

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

Reservations NOT Subject to Equitable Participation

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

Estimated Indirect Costs

Indirect Costs (Click [Here](#) to estimate indirect costs for entire budget.): \$ 6,700

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,
 - 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 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 - NCLB

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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	Percent Low Income	Per Pupil Amount	Attendance Area Allocation
Red School 165 low income students	K-5	47.41%	\$502	\$82,830
Blue School 226 low income students	K-5	42.56%	\$501	\$113,226
Green School 78 low income students	K-5	41.71%	\$501	\$39,078

Ranking and Per Pupil Amounts

TI School Eligibility

Instructions

Ranking Options

District Poverty Average 48.75 %

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

\$592,524.00

School Code	Attendance Area (School Name)	Grade Span	Percent Low Income	125% PPA Flexibility	Exception Name	Eligibility	Program Type	Per Pupil Amount	Public Allocation	Private Allocation	Total Allocation
0080	Lawrence-Lawson El	KG-03	65.90 %	No		E	Schoolwide	\$612.00	\$105,264.00	\$3,672.00	\$108,936.00
0410	Sparta High Point Sch	07-12	60.61 %	No		E	Schoolwide	\$612.00	\$12,240.00	\$0.00	\$12,240.00
0110	Maplewood El	KG-03	58.89 %	No		E	Schoolwide	\$612.00	\$64,872.00	\$3,672.00	\$68,544.00
0800	SAILS Sparta Alt Independ Lrn Sch	09-12	53.57 %	No		E	Schoolwide	\$612.00	\$9,180.00	\$0.00	\$9,180.00
0120	Southside El	KG-03	52.92 %	No		E	Schoolwide	\$612.00	\$83,232.00	\$2,448.00	\$85,680.00

Title I Equitable Services for Private Schools

- **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://dpi.wi.gov/title-i/consultant-directory>
- Title I Network Coordinators
 - <http://dpi.wi.gov/title-i/network/contacts>