

# New Title I Directors

Understanding the Requirements of Title I, Part A

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# AGENDA

- ◉ Welcome and Introductions
- ◉ What is Title I, Part A?
- ◉ What are the Key Requirements?
- ◉ What Do You Need Next?

# Introductions

All stand, then sit down by groups:

- A. I'm not the LEA Title I Director
- B. More than 5 years as Title I Director
- C. 2-5 years as Title I Director
- D. 1 year or less as Title I Director

# 1965 – *The First Title I*

Sitting next to his first teacher, President Johnson signs the Elementary and Secondary Education Act of 1965 on April 11, 1965.



# Title I - A Brief History

- 1965 – ESEA originally passed
- Reauthorized with different “nicknames”
  - › 1994 – Improving America’s School Act (Title I)
  - › 2001 – No Child Left Behind
- Modified through regulations and new funding
  - › 2008 – New Regulations – CFR 200
  - › 2009 – Title I ARRA funding
  - › 2011 – ESEA Flexibility Waivers
- Reauthorization???

# Purpose of Title I

- Purpose is to increase the achievement of all students, *particularly those who are disadvantaged*
- Ensure all children have fair, equal, and significant opportunity to obtain high quality education
- Reach, at minimum, proficiency on challenging state standards & assessments (reading, mathematics, and readiness)

# Federal Funds Supplement State and Local Support

- Title I, Part A provides federal dollars to help *supplement* educational opportunities for children who live in high poverty areas who are most at risk of failing to meet state's challenging achievement standards.
- Funds flow to SEAs then to LEAs and finally to Title I schools.

# Title I Director's Role

- Varies depending on structure of LEA
- Typically includes:
  - Overseeing LEA grant application and approval process for Title I funds
  - Allocation of Title I, Part A funds to schools
  - Working with parents, teachers, school administration, and the community to design, implement and evaluate Title I programs and plans
  - Self monitoring for compliance of Title I laws and regulations
  - May include oversight of school and district improvement, or other programs

# Levels of Authority

- **Title I, Part A Statute**

ESEA: <http://www.ed.gov/esea>

ESEA Legislation:

<http://www2.ed.gov/policy/elsec/leg/esea02/pg2.html>

- **Code of Federal Regulations (CFR)**

- > Title 34 Education <http://ecfr.gpoaccess.gov/>

- > Education Department General Administrative Regulations (EDGAR):

<http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>

- **USED guidance [www.ed.gov](http://www.ed.gov)**

- > Non-regulatory guidance

<http://www2.ed.gov/policy/elsec/reg/edpicks.jhtml?src=ln>

- > Policy letters

<http://www2.ed.gov/policy/elsec/guid/stateletters/index.html>

- **Title I School Improvement Legislation**

<http://www2.ed.gov/policy/elsec/leg/esea02/pg1.html>

# Topics

- Title I, Part A Program Models
- Allocations and Set-Asides
- 3 Key Fiscal Requirements
- Additional Fiscal Issues
- Private School Requirements
- Monitoring
- Optional topics
- Working with FDOE staff

# Title I Program Models



# Title I Program Models

## ◉ Targeted Assistance

- › Section 1115
- › Eligible Students
- › Targeted Resources

## ◉ Schoolwide

- › Section 1114
- › Needs Assessment
- › Schoolwide Plan

# Targeted Assistance

The term “**targeted assistance**” signifies that direct supplemental services are provided to a select group of students – not the entire school population.

# Targeted Assistance Eligibility

Students are eligible for services if the school has identified the students as failing, or most at risk of failing, to meet the state's achievement standards based on certain criteria.

Income status is not an eligibility criteria.

# Targeted Assistance Criteria

- Eligibility is based on multiple, educationally related, objective criteria established by the LEA.
- Students preschool age through grade 2 are selected based solely on the basis of criteria such as teacher judgment, interviews with parents, and developmentally appropriate measures.

# Targeted Assistance

Services may be delivered in a number of ways such as:

- > In-class instruction
- > Pull-out model
- > Extended day
- > Summer programs

# Targeted assistance programs must...

- Provide additional instructional support to support the core instruction
- Use highly qualified and trained teachers and paraprofessionals
- Provide professional development for teachers
- Use strategies to increase parent engagement
- Coordinate with other programs and provide transition services from Pre-K to elementary grades

# Targeted Assistance

- Only teachers & paraprofessionals funded directly by I-A (in whole or in part) are Title I staff
- Only students who receive services are counted as Title I students for reporting purposes
- Must track types of services provided to eligible students
- All students eligible for I-A services should receive them, even if eligible under other programs

# Schoolwide Model

- A Title I school is eligible to become a schoolwide program when the student poverty level is at or above 40 percent.
- A schoolwide program has more flexibility in the use of Title I funds and in the delivery of services than a targeted assistance program.

# Schoolwide Model

- Title I funding is considered *supplemental* to state and local funding and may be used to support any part of the educational plan.
- Title I and other federal funds may be consolidated with state and local funds to support the schoolwide plan.

# Schoolwide Model

- A schoolwide program is designed with the knowledge that there is a link between poverty and low achievement. When there are large numbers of disadvantaged students, interventions will be successful when implemented “schoolwide.”
- The school staff members work together to develop curriculum and instruction to raise the achievement of **all** students and give support to low-achieving students.

# Schoolwide Model

- All teachers and paraprofessionals are considered "Title I"
- All students are considered "Title I".
- Services to students do not have to be tracked and reported separately.

# Schoolwide Planning Cycle

1. Conduct a comprehensive needs assessment (include needs of migratory students).
2. Develop the schoolwide plan (ten components) usually over the period of one year, unless the LEA determines that less time is needed.
3. Implement the plan.
4. Annually evaluate the plan to ensure that students demonstrate academic achievement and modify the plan based on this data.

# Schoolwide Plan

- The plan must be developed in consultation with the school support team and other technical assistance providers.
- Must be developed with the involvement of parents, community members, and individuals who carry out such a plan, including teachers, principals and administrators.

# Schoolwide Ten Components NCLB Section 1114(b)(1)

1. A comprehensive needs assessment of the entire school based on information that includes the performance of children in relationship to the state's academic achievement standards.
2. Schoolwide reform strategies that:
  - a. Provide opportunity for all students to meet the states proficient and advanced levels of student achievement.
  - b. Use effective methods and instructional strategies from scientifically-based research.
3. Instruction by "highly-qualified teachers and paraprofessionals."

# Schoolwide Ten Components NCLB Section 1114(b)(1)

4. High quality and ongoing professional development for teachers, principals, and paraprofessionals (and other staff if appropriate).
5. Strategies to attract high quality, highly-qualified teachers to high-need schools.
6. Strategies to increase parental involvement, such as literacy services.

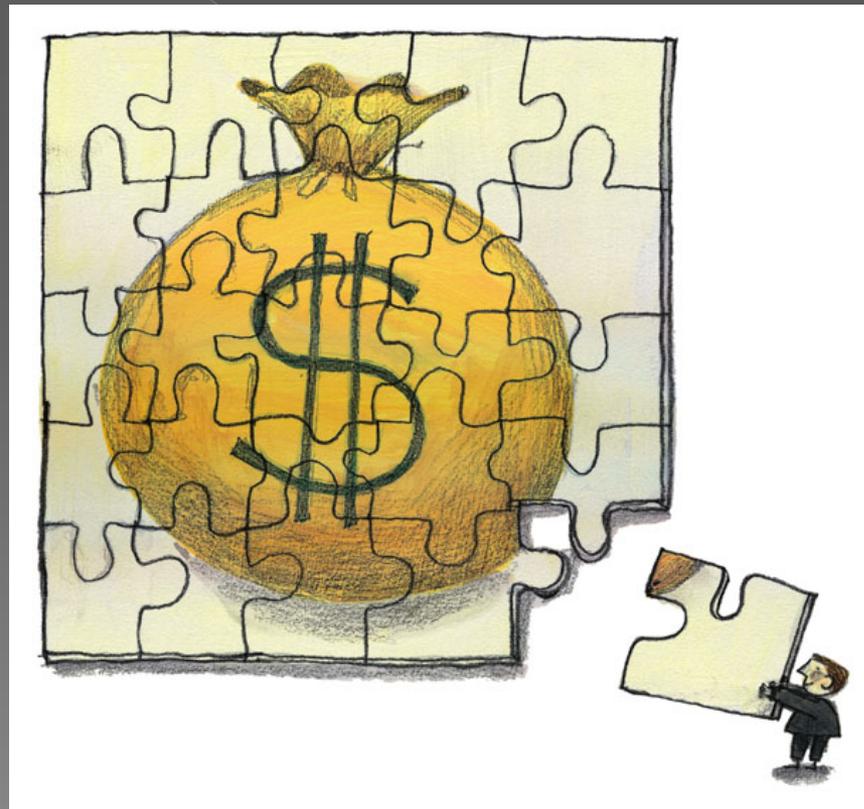
# Schoolwide Ten Components NCLB Section 1114(b)(1)

7. Plans for assisting transition from early childhood programs to local elementary school programs.
8. Measures to include teachers in the decisions regarding the use of academic assessments to provide information on, and to improve, the academic achievement of individual students and the overall instructional program.

# Schoolwide Ten Components NCLB Section 1114(b)(1)

9. Activities to ensure that students who experience difficulty mastering the proficient or advanced levels of academic achievement standards are provided with effective, timely, additional assistance.
10. Coordination and integration of federal, state and local services and programs including programs related to Title I, violence, nutrition, housing, Head Start, adult education, vocational and technical education, and job training.

# Allocations and Set-Asides



# Determining School Allocations Overview

- Determine school poverty rates
- Determine which schools will be served:
  - Ranking & serving rules
  - 125% rule
  - Exceptions
- Determine LEA set-asides
- Distribute funds to schools

# Determining Schools Eligible to be Served

- Type of poverty data must be same for all schools
  - > Most use free & reduced priced lunch qualification
- **All public schools** (including charter schools) must be listed on the public school eligibility survey with poverty rate

# Use Ranking & Serving Rules

- ◉ Rank all LEA schools in order by poverty
- ◉ All schools at 75% or above poverty *must* be served
- ◉ Other schools must be served in rank order, from highest to lowest, all above district poverty average or 35%, as far as Title I funds will reach (LEA may set lower boundary)
- ◉ May group and rank by grade span in order to focus services to a particular grade span of schools
- ◉ If *any* school is served that is below 35% poverty, must use 125% rule (see slide 39)

# Special Rules

- **Small LEAs** may serve *any* school(s) if these criteria are met:
  - › Single attendance area (a one-school LEA or one school per grade span), **or**
  - › LEA enrollment < 1000
  - › Allows small LEAs to focus services to schools as needed without ranking and serving rules
- **“Grandfather” rule:**
  - › An LEA may serve a school for one more year that falls below the poverty threshold for Title I schools
  - › Allows a school to continue services as poverty levels fluctuate

# Skipping Schools

- An eligible school may only be “skipped” or excluded from Title I funding if:
  - The school receives funding from *supplemental* state or local sources
  - The funding is equivalent to or greater than what would be received under Title I
  - The funding is used to provide a Title I-like program
  - The school meets comparability requirements.

# Title I Set-Asides

- Set-asides are amounts used at the LEA level before allocating funds to schools; some are required, others are optional.
- Types of set-asides:
  - Administration (optional, as needed)
  - Maintain Highly Qualified Status of Teachers and Paraprofessionals\* (5% unless a lesser amount is needed)
  - Parent Involvement\* (1% required if total allocation is greater than \$500,000; 95% must be used at schools.)

# Title I Set-Asides

- Homeless (required unless there are no non-Title I schools.)
- Neglected & Delinquent (required, amount optional)
- LEA-Wide Activities\*: Instructional Activities and Professional Development (optional)
- Professional Development for Priority and Focus Schools (optional)
- SES\* (required, an amount equal to 15% of the total allocations going to schools)

# Funds available to schools

- ◉ Find total of set-asides
- ◉ Subtract from total allocation
- ◉ Add carryover from prior fiscal year (optional)
- ◉ Balance is amount available to distribute to schools

# Determine School Allocations

- Determine standard (or 100%) per pupil amount (PPA) by dividing the total *I-A amount available to schools by the total number of low-income students in the Title I schools being served.*
- The 100% PPA is a guide to determine how to fund each Title I school.
- Calculate school allocation by # of low-income students X PPA
- Schools served in rank order may be funded at different per pupil amounts (PPA) *as long as higher poverty schools have = or > PPA than lower poverty schools.*

# 125% Rule

- Only required if serving schools < 35% poverty
- If district poverty average (DPA) is lower than 35%, the LEA may serve schools down to DPA (or grade span average) but must allocate at least 125% of district per pupil amount to every school served in the rank order.
- *Total allocation ÷ total # of low-income students in district x 1.25 = 125% PPA.* This is the required minimum PPA for all schools served.
- Purpose of 125% rule is to concentrate Title I funds for more effective programs

# 3 Key Fiscal Requirements



# 3 Key Requirements

- ① **Maintenance of Effort**

Section 1120A(a) and 9521 of NCLB; 34 CFR 299.5

- ② **Comparability**

Section 1120A(c) and (d); 34 CFR 200.79

- ③ **Supplement, Not Supplant**

Section 1120A(b) and (d) of NCLB; 34 CFR 200.79

# 3 Key Requirements

- ◉ An LEA must:
  - > **maintain fiscal effort** with state and local funds;
  - > provide services in its Title I schools with State and local funds that are at least **comparable** to services provided in its non-Title I schools; and
  - > use Title I-A funds to **supplement, not supplant** regular non-Federal funds.

# Maintenance of Effort

The LEA has maintained fiscal effort if *either*...

- > the combined fiscal effort (of LEA and state) per student *or*
- > the aggregate (total of included) expenditures of the LEA and state for public education

... were at 90% of that of the preceding year.

This shows the district maintained its non-federal funding within 90% and is eligible to receive its full allocation of I-A funds.

# Comparability

- An LEA must use state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds.
- If the LEA serves all of its schools with Title I funds, the LEA must use state and local funds to provide services that, taken as a whole, are substantially comparable in each Title I school.

# Comparability

- ◉ Measure to demonstrate comparability:
  - > Student/instructional staff ratios

# Comparability

- ◉ SEA has flexibility in establishing methods and reasonable variances between Title I and non-Title I schools:
  - > May compare schools by commonalities such as size and grade span.
  - > May allow student/staff ratios and instructional expenses to vary within 10%.
  - > May exclude certain expenses and salary cost differentials for experience.

# Supplement Not Supplant

- Federal funds must be used to “supplement, not supplant” services, staff, programs, or materials that would otherwise be paid with state or local funds (and, in some cases, other federal funds).
- Always ask: “What would have happened in the absence of federal funds?”

# Supplement Not Supplant

## Presumption of Supplanting

- The LEA has used the Title I funds to provide services that the LEA was required to make available under federal, state or local law.
- The LEA used Title I funds to provide services it provided with non-federal funds in the prior year(s).
- The LEA has used Title I funds to provide services for participating children that it provided with non-federal funds for non-participating children.

# Supplement Not Supplant

## To rebut presumption show:

- › Fiscal or programmatic documentation to confirm that, in the absence of federal funds, the activity/services/staff would have been eliminated
- › State or local legislative action
- › Budget histories and information

# Other Fiscal Issues



# Additional Fiscal Issues

- ◉ Subgrants & Applications
- ◉ Grant Period
- ◉ Allowable Expenses
- ◉ Time and Effort

Federal Office of Management and Budget's  
*Circular A-87, Cost Principles for State, Local, and  
Indian Tribal Governments.*

# Subgrants

- ◉ Title I is a subgrant (e.g., pass-through funds from state administered program)
  - > Allowable activities based on applicable statute, local plan, state rules
  - > LEAs must submit application to receive funds

# Grant Period

- Title I funds are “27 month” money
- Federal FY 2012 funds:
  - > July 1, 2012 – September 30, 2013 (1<sup>st</sup> grant period)
  - > October 1, 2013 – September 30, 2014
- No more than 15% of the Title I allocation may be carried forward to the next FY
  - > SEA may approve an exception once every three years
- State must return funds not obligated to the federal government

# Allowable Expenses

- All Costs Must Be:
  - Allowable under grant requirements
  - Necessary & reasonable
  - Allocable (proportionate to program)
  - Legal under state and local law
- OMB Circular A-87: State, Local & Indian Tribal Governments
- OMB Circular A-133: Compliance Supplement

# Time and Effort

- ◉ Time and effort reporting is required when any part of an individual's salary is charged to a federal program.
  - > Single cost objective → Semi annual certification.
  - > Multiple cost objectives → Monthly time reports or Personnel Activity Reports (PARs).

# Schoolwide Time and Effort

- Schoolwide plan **must** specify programs to be included (not all programs may be included).
- A schoolwide program is a single cost objective
  - > If employee works 100% on programs combined → *Semi-annual certification.*
  - > If employee works partially on programs combined and partly on those not combined → *Monthly time report (PAR).*

# Title I Private School Program



# Private School Participation

## Title I, Part A

If the Title I, Part A program is available to the public school students, teachers, and parents, then the opportunity is available to private school students, teachers, and parents on an equitable basis.

- > *NCLB Section 1120 – Participation of Students Enrolled in Private Schools*
- > *34 CFR 200.62-67*

# Title I Private School Requirements

- ESEA requires equitable participation of private school students, teachers, and parents
- Consultation with private schools must occur before decisions are made about programs to be offered
- Needs of private school students, parents, and teachers are determined separately from those of public school students, parents & teachers
- Private school students, parents & teachers must receive services comparable to those received by public school students, parents, & teachers

# Consultation

Consultation between the public school and private schools, during the design and development of the programs:

- Must be timely and meaningful.
- Must take place on an annual basis, and be documented by the district: sign in sheets, agenda, written affirmation.
- Must continue throughout the year, to ensure the needs of private school students are being met.
- Shall occur before the LEA makes any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate.

# Funding for Services to Private School Students and Teachers

- Private school allocation for Title I is determined by # of low-income students residing in attendance areas selected to be served under Title I
- Title I services to private school students are based on academic need and are always “targeted assistance”

# Sample Private School Funding Chart

District Level Data: <b>Date Certain: 04/10/2012, not pooling Form A Free and Reduced Lunch</b>								
	A	B	C	D	E	F	H	I
	Nonpublic School Name	Nonpublic School Number	Grade Span	Number of Private School Students Residing In PSAA	Public School Number	Current PPA*	Number of Private School Students from Low Income Families	Dollars Generated
1	Big Thunder Elementary	2218	PreK-8	18	61	225	15	\$3,375.00
2	Great Start Private School	2218	PreK-8	10	91	225	8	\$1,800.00
3	First City Private School	2218	PreK-8	9	41	225	7	\$1,575.00
4	Lightening Strike Middle	2218	PreK-8	7	201	225	5	\$1,125.00
<b>Total Amount Available for Instructional Services at Private Schools</b>								<b>\$ 7,875.00</b>

\*The Current PPA (column F) is pulled from the PSES according to the public school number.

# Eligible Private School Student

- An eligible private school student resides in the participating attendance area of the LEA and is selected on the same basis as targeted assistance students.

[34 CFR 200.62]

# Private School Participation

## Examples of Services

- Instructional services outside the regular classroom
- Extended learning time (before/after school and in the summer)
- Family literacy programs
- Counseling programs
- Early childhood
- Home tutoring
- Computer-assisted instruction

[Non-Regulatory Guidance B37 & B38]

# Basic Rules of Service Delivery

- All services are provided by and under the control and supervision of the LEA.
- Services for private school children must begin at the same time as services for public school children (unless the LEA and the private school agree to a different start date during consultation).

[Non-Regulatory Guidance B39 & B40]

# Basic Rules

- The LEA maintains control of all materials, supplies, equipment, and property acquired with Title I funds for the benefit of eligible private school students.

[34 CFR 200.67]

- Key word is services. No public funds are distributed to private schools, only services and materials.

[Non-Regulatory Guidance B-28]

# Parental Involvement



# District Set-Asides for Parent Involvement

- ◉ LEA that receive \$500,000 or more in Title I, Part A funds must set aside, at minimum, 1% for parent involvement purposes, including promotion of parent literacy and developing parenting skills.
  - > 95% of the district set-sides must be allocated to Title I schools for school-level parent involvement.
- ◉ Districts < \$500,000 must also provide parent involvement opportunities at the LEA and school levels.

[NCLB Section 1118(a)(3), Parent Involvement Guidance C-14]

# Title I Parent Involvement

## District Parent Involvement Policy is:

- A written document
- Jointly developed and agreed upon with parents
- Describes elements of parent involvement activities that will be implemented at Title I schools
- Distributed to all parents of participating students

\*\*If the district already has a parent policy, it *can be amended* to meet Title I requirements.

# Title I Parent Involvement

## School Parent Involvement Policy is:

- Written policy (plan)
- Agreed upon by parents
- Describes the means for carrying out parent involvement activities at the building level
- Distributed to parents, and the local community, in a format and language, to the extent practicable, that parents can understand

\*\*If the school has a parental involvement policy that applies to all parents, it *may be amended* to meet the requirements of Title I.

# Title I Parent Involvement

## Building Parent Involvement:

- Provide timely information about programs
- Involve parents in an on-going, timely planning, review, and improvement of the school parental involvement policy and the joint development of the schoolwide program plan
- Include a description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet

# Shared Responsibility for High Student Academic Achievement

## **School-Parent Compact:**

Each Title I school shall jointly develop with parents, for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the state's high standards.

# Parent Notification Requirements

- **School and LEA Parent Involvement Policies**

[NCLB Section 1118(a)(2) and (b)(1), Parent Involvement Guidance, C-3 and C-4 (district), and D-1 (school)]

- **Compact**

[NCLB Section 1118(d)], Parent Involvement Guidance D-8]

- **Annual Report Cards**

[NCLB Section 1111(h)(1) and (2), Parent Involvement Guidance, B-5 (State) and C-7 (District)]

- **Individual Student Assessment**

[NCLB Section 1111(h)(6)(B)(i), Parent Involvement Guidance, D-10]

# Monitoring LEAs

- Use regular cycle to monitor Title I programs
- Notify schools in advance
  - › Schedule of monitoring
  - › FDOE team members
  - › Any advance documentation required
- Use monitoring indicators to determine compliance
  - › FDOE Workpapers
  - › Interview staff, review additional supporting documentation

# What would be most helpful to you?

- ◉ Additional trainings for new directors?
- ◉ Conference calls, audio conferences or webinars?
- ◉ Networking with other directors?
- ◉ Having a mentor?
- ◉ Regional meetings?

# Questions?



# Contact Information

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