

20 | **ON TRACK**
24 | *with Federal Programs*

Federal Programs Institute

SEPTEMBER 10-12 • Chattanooga Convention Center





How to Conduct a Compliant Title I, Part A Program

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Agenda

- Purpose of Title I, Part A Funds
- Ways to Serve Title I Schools
- School Eligibility and Ranking
- Allocation of Funds to Eligible Schools
- Serving Title I Schools Overview
 - Three Fiscal Tests
 - Parent and Family Engagement Requirements
 - Other Requirements
- Closing



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Purpose of Title I, Part A Funds

Purpose of Title I, Part A Funds

- School-based:
 - Funds are to be pushed down (spiraled) to schools to address the unique needs of the schools.
 - A limited amount of funds may be reserved at the LEA level.
 - Expenditure of funds **must** be aligned with school plans (InformTN).
- High poverty:
 - Funds must be targeted to schools with the highest levels of poverty within each LEA.
 - Specific rules have been legislated to ensure this targeting of funds occurs.



Purpose of Title I, Part A funds

- Title I, Part A funds are formula funds allocated to local education agencies (LEAs) in order to:
 - provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.
 - provide school-based programs and services to address identified student needs.



See 20 U.S.C. § 6301.

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Ways to Serve Title I Schools



Ways to Serve a Title I school

▪ Targeted Assistance (TA) Programs:

- TA schools receive Title I funds but are ineligible or have chosen not to operate a Title I schoolwide program.
- TA schools use Title I funds to provide services to a **select group of children**--those identified as failing, or most at risk of failing, to meet the State's challenging content and student performance standards.
- TA students are identified as failing, or most at risk of failing, to meet the State's challenging student academic standards based on **multiple, educationally related, objective criteria**.

See generally 20 U.S.C. § 6315.



Ways to Serve a Title I School

▪ Schoolwide (SW) Program:

- If **40%** or more students in a Title I school are from low-income families, this method may be utilized. *See* 20 U.S.C. § 6314(a)(1)(A).
- A school operating a schoolwide program does not need to identify particular students as eligible to participate. *See* 20 U.S.C. § 6314(a)(2)(A).
- There are **three basic components**:
 1. Conduct a needs assessment
 2. Prepare a comprehensive school-wide plan (InformTN)
 3. Review the school-wide plan with stakeholders annually
- A school operating a schoolwide program may use Title I funds for any activity that supports the needs of students in the school as identified through the comprehensive needs assessment and articulated in the schoolwide plan. *See* 20 U.S.C. § 6314(b).



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School Eligibility and Ranking

Data Used to Determine Eligibility

- Schools are deemed eligible for Title I based on the school's percentage of poverty.
- LEAs have the option of the following data sources to determine poverty percentages:
 - Free & Reduced-Price Lunch—Month & Year of Data Used;
 - Direct Certification—Month & Year of Data Used;
 - Temporary Assistance for Needy Families (TANF)—Month & Year of Data Used;
 - Medicaid—Month & Year of Data Used;
 - Census—Month & Year of Data Used;
 - Household Survey (optional) – Month & Year of Data Used; or
 - A combination of any of the above, with duplications removed

See 20 U.S.C. § 6313(a)(5).





School Ranking Rules

- LEAs must review poverty percentages for all* schools and determine how to rank the schools to:
 - Identify schools eligible for Title I funding
 - Allocate funds to each eligible school
- Several options are available:
 - Grade span ranking
 - District-wide ranking
 - Exception
 - Less than 1,000 students enrolled in the LEA
 - Single attendance area

See 20 U.S.C. § 6313(a)(5), (6).

*Adult high schools and alternative education programs will be excluded.



Eligibility Determination

- Each school's poverty percentage must be compared to one of the following:
 - District-wide poverty average
 - Grade span poverty average
- Schools at or above the comparison average are eligible for Title I, Part A services.
- Schools below the comparison average can be made eligible using the "35% Rule" with poverty averages at or above 35%.
- Schools below 35% require LEAs to utilize the 125% rule (discussed on Slide 19).

See 20 U.S.C. § 6313(b)(1), -(c)(2)(A).



Eligibility Determination

- If no standard rules make a school eligible for Title I, but it was eligible in the previous year based on standard rules,
 - It may be **grandfathered for the first year only** for Title I services to be continued or the LEA can apply for a waiver with the assistant commissioner of federal programs and oversight (FPO) allowing the school to be Title I for two more years.
 - If the school fails to meet the standard eligibility rules in the following year, it is no longer eligible for Title I services. However, a **waiver** can be applied for with the assistant commissioner of FPO allowing the school to be Title I for two more years.

See 20 U.S.C. § 6313(b)(1)(C).



Eligibility Determination

- **Schools Over 75%:**

- After an LEA has served all its schools with a poverty rate above 75%, if funds remain, the LEA may serve lower ranked eligible schools.

- **High School Priority:**

- The LEA may prioritize high schools with 50% or more poverty.
- High schools with 75% or more poverty must still be given priority, but high schools between 50% and 74% are given priority over all other schools.



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Allocation of Funds to Eligible Schools

Targeting to High Poverty Schools

- LEAs must allocate funds to eligible schools on a per-pupil basis.
- For each poverty student, a per-pupil allocation (PPA) must be awarded.
- The PPA must be awarded to schools based on their ranking in the:
 - Grade span group or
 - District-wide.
- The PPA can either be the same for all schools within the ranking or must be ordered from high to low (highest poverty school(s) receives the highest PPA).

Appropriate Funding Levels

- Title I, Part A funds may be allocated to all eligible schools, in rank order; however:
 - No school can receive less than \$100 PPA;
 - Funds allocated must be sufficient to provide an effective and impactful program for participating students; and
 - Programs must not be watered down to spread funds across all schools or more eligible schools.



Appropriate Funding Level – Serving School(s) Below 35%

- If an LEA allocates Title I funds to one or more eligible schools below 35% poverty, all Title I schools must receive a “minimum” PPA, which is 125% of the average district PPA.
- The last school to be served may receive less than the minimum PPA.
- The amount auto-populates on both the allocation designation page and the PPA page of the Consolidated Funding Application (CFA).



Example/Activity

Scenario:

- Assume these schools have been determined to be eligible using proper ranking and eligibility rules (grade span).
- Questions to discuss and answer:
 1. Have Title I funds been allocated properly to these eligible schools?
 - If not, what are the problems?
 - What rules are not being followed?
 - How should it be corrected?
 2. If Brown Middle School's poverty count is corrected and the poverty percentage changes to 89%, how would that impact PPAs?

School	Sort Order	Poverty %	PPA
Blue Elementary School	1	87%	\$1000
Pink Elementary School	1	78%	\$1100
Purple Elementary School	2	64%	\$1000
Brown Middle School	3	73%	\$900
Green Middle School	3	59%	\$900
Yellow High School	4	67%	\$900

Example/Activity



Scenario:

Questions to discuss and answer:

1. Are these schools ranked according to the ranking rules?
 - If not, what are the problems?
 - What rules are not being followed?
 - How should it be corrected?
2. Have eligibility determinations been made properly?
 - If not, what are the problems?
 - What rules are not being followed?
 - How should it be corrected?

School	Grades	Service	Poverty %	Sort Order	Eligibility
Maple Elementary	K-5	SW	76%	1	Y
Elm Elementary	K-5	SW	69%	1	Y
Poplar Middle School	6-8	None	75%	2	Y
Sycamore Middle School	6-8	None	54%	2	N
Oak High School	9-12	SW	68%	3	Y
LEA Average Poverty			67%		

SUPPORTING WORK



Overview of Entire Process

Description	Things to Consider
Select the primary measure that will be utilized for determining poverty in the district.	The measure chosen must be consistent across the district and collected at the same point in time. Also, if utilizing a combination of measures such as primary being Free and Reduced Lunch and Census being secondary, remove duplicates.
Determine amount available to be allocated to schools. Remember set asides will be deducted and not allocated to the schools.	Required set asides include: <ul style="list-style-type: none"> • Services to support students experiencing homelessness • Parent and Family Engagement (only applies to districts with an allocation of more than \$500,000) • Equitable services for eligible non-public school students in private schools that choose to participate in Title I-A
Rank order all schools in the district by percentage of poverty either utilizing ranking of district-wide or grade-span.	Must allocate to schools with 75% or more regardless of grade span.
After schools with 75% poverty or above are served, determine whether to rank the remaining schools into district-wide or grade-span.	If a district selects grade span grouping as the method for serving schools, the district can choose to fund grade spans at different Per Pupil Amounts (PPA). NOTE: The PPA amount for a higher poverty school must be more than or equal to that of a lower poverty school within the same grade span. Higher or equal to PPA amounts for higher poverty schools when utilizing district-wide
Determine the amount of funding for each school served.	If a school whose poverty rate is below 35% is served, all schools being served must receive a PPA that is equal to or greater than 125% of the PPA the district receives. The last school in the spiral may receive less as an exception.

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Requirements of Title I Overview

Three Fiscal Tests

Comparability

- Demonstrating comparability is a prerequisite for receiving Title I, Part A funds.
- Each LEA must perform comparability calculations annually to demonstrate that all Title I schools within the LEA are, in fact, comparable and adjust if any are not comparable since Title I, Part A funds are made annually.
- LEAs are required to have a written procedure for calculating comparability (example in Procedures Guide)

See 20 U.S.C. § 6321(c)(1)(A).



Comparability

- The basic premise of comparability is to ensure that an LEA can demonstrate that state and local funds used to provide services in Title I schools are at least comparable to the services in non-Title I schools.
 - Grade span groupings used to demonstrate comparability are very important.
 - Grade span groupings must match the basic organization of schools in the LEA.
 - **Note:** *Pre-K is not included in comparability.*
- See 20 U.S.C. § 6321(c)(1)(C).*



Comparability

- The standard comparability method Tennessee uses compares student/staff ratios for state and locally-funded instructional staff in each Title I school with the average student/staff ratios for state and locally-funded instructional staff in non-Title I schools.
- A Title I school is deemed comparable if its student/staff ratio does not exceed 110 percent of the average student/staff ratio of non-Title schools.
- If all schools in the LEA or all schools within a particular grade span are Title I, a Title I school is deemed comparable if its student/staff ratio does not exceed 110 percent of the average student/staff ratio of Title I schools.



Illustrating Comparability - Schools in the LEA

Schools in a District



Title I



Title I



Title I



Non-Title



Non-Title



Non-Title

Illustrating Comparability - Allocating State & Local Funds to Schools

Comparable State & Local Funds at Title I Schools



Title I



Title I



Title I



Non-Title



Non-Title



Non-Title

Illustrating Comparability - Allocating Title I Funds to Title I Schools

SUPPLEMENTAL Title I Funds
are Like the Cherry On Top of State & Local Funds



Title I



Title I



Title I



Non-Title



Non-Title



Non-Title

Illustrating Comparability - Are Title I Schools Comparable?

State & Local Funds Cannot be Limited at Title I Schools and Increased at Non-Title I Schools



Supplement Not Supplant (SNS)

- Under the Every Student Succeeds Act (ESSA) districts are required to submit the methodology used to ensure that Title I, Part A funds are supplemental.
- LEAs must describe in the methodology how the distribution of state and local funds to each school is neutrally determined.
 - The LEA may not reduce state and local funds based on the Title I, Part A allocations the schools will receive.
- LEAs excluded from SNS Methodology Test:
 - Only Title I schools; or
 - A grade span that contains only:
 - A single school, non-Title I schools, or Title I schools

See 20 U.S.C. § 6321(b).



Supplement Not Supplant

- SNS General Rule: supplement, not supplant provision requires that federal grant funds must add to (or supplement) and not replace (or supplant) other funds (state/local) in providing general educational services.
- SNS Purpose: ensure that federal funds are utilized to benefit the intended population in the authorizing statute and not being used to fund the basic education that the LEA would have provided in the absence of federal funds.
- SNS Test of Compliance: a LEA shall demonstrate that the methodology used to allocate state and local funds to each school receiving assistance ensures that each school receives all the state and local funds it would otherwise receive if it were not receiving assistance under Title I, Part A. *See 20 U.S.C. § 6321(b)(2).*
- The SNS tool is housed in ePlan under Data and Information.



Supplement Not Supplant

- Once the test is met, and evidence is provided that each Title I, Part A school received its “fair share” of **state and local funds** based on the LEA’s funding methodology, items supported by Title I in a targeted or school-wide program are deemed to be supplemental.
- Thus, complying with supplement not supplant for Title I schools becomes a funding test, not an expenditure-by-expenditure test.



Maintenance of Effort (MOE)

- An LEA may receive its full allocation of Title I, Part A funds for any fiscal year only if the state educational agency (SEA) determines that the LEA has maintained its fiscal effort in accordance with 20 U.S.C. § 7901.
- Maintenance of effort laws ensure that local funds budgeted for schools do not decrease, even as state funding for schools increases.
- Level 1 Test: The LEA's total budgeted local revenues are not less than its budgeted local revenues from the previous year, excluding capital outlay and debt service.
- Level 2 Test: Triggered when Level 1 Test is not met due to declining enrollment. The LEA's budgeted per-pupil local revenues must not be less than their budgeted per-pupil revenues from the previous year.





Maintenance of Effort (MOE)

- Test is included in the State Funds Application in ePlan and must be met for budgets to be approved.
- For further information regarding MOE, contact your [finance consultant](#).



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Requirements of Title I Overview

Parent and Family Engagement



Family Engagement - LEA Basic Requirements

- Title I, Part A requires that LEAs conduct outreach to **all parents and family members** and implement programs, activities, and procedures for the involvement of parents and family members.
- Such programs, activities, and procedures shall be **planned and implemented with meaningful consultation with parents of participating children**.

See 20 U.S.C. § 6318(a)(1).

Family Engagement - LEA Basic Requirements

- Each LEA that receives **more than \$500,000** in Title I, Part A funds, shall reserve at least **one percent** of its allocation to assist schools to carry out the parental engagement activities.
- Funds reserved by an LEA shall be used to carry out activities and strategies **consistent with the LEA's Parent and Family Engagement Policy**.
- Parents and family members of children receiving services shall be **involved in the decisions** regarding how the funds reserved are allotted for parental involvement activities.
- Not less than **90 percent** of the funds reserved shall be distributed to schools served with priority given to high-need schools.

See 20 U.S.C. § 6318(a)(3).



Family Engagement - LEA Basic Requirements

- LEA parent and family engagement funds must be used for at least **one** of the following activities:
 - supporting schools in training school staff regarding engagement strategies;
 - supporting programs that reach families at home, in the community, and at school;
 - disseminating information on best practices focused on engagement, especially for increasing engagement of economically disadvantaged families;
 - providing subgrants to schools to collaborate with community-based organizations or businesses that have a track record of improving family engagement; and/or
 - engaging in any other activities that the LEA believes are appropriate in increasing engagement.

See 20 U.S.C. § 6318(a)(3)(D).



Family Engagement - LEA Basic Requirement

- An LEA that receives Title I, Part A funds shall develop jointly with, agree on with, and distribute to, parents and family members of participating children a written **parent and family engagement policy**

See 20 U.S.C. § 6318(b)(1).



Family Engagement – School Annual Title I Meeting

- **At a minimum, it must be discussed how the school will:**
 - convene an **annual meeting** to describe the school’s participation in the Title I, Part A program and the rights of families to be involved;
 - offer a **flexible** number of meetings;
 - **include families** in the planning, review, and improvement of the parent and family engagement policy and programs;
 - provide timely information about **family activities**, a description and explanation of the **school’s curriculum**, forms of **academic assessment**, and expected **achievement levels**; and
 - jointly develop with families, a **school-parent compact** that outlines how families, school staff, and students will share the responsibility for improved student academic achievement and develop a partnership to help students achieve state standards.

See 20 U.S.C. § 6318(c).



Family Engagement – School Policy

- Each school served under Title I, Part A shall jointly develop with, and distribute to, parents and family members of participating children a **written parent and family engagement policy**, agreed on by such parents, that shall describe the means for carrying out the requirements of 20 U.S.C. § 6318(c)-(f).
- Parents shall be notified of the policy in an **understandable and uniform format** and, to the extent practicable, provided in a **language the parents can understand**. See 20 U.S.C. § 6318(b)(1).
- Such policy shall be **made available to the local community and updated** periodically to meet the changing needs of parents and the school. See 20 U.S.C. § 6318(b)(1).



Family Engagement – School Compact

- Title I, Part A, requires that schools shall:
 - Jointly develop with parents...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.

See 20 U.S.C. § 6318(d).



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Other Title I Requirements

Other Requirements

■ Personnel Qualifications

- At the beginning of each year, an LEA shall notify parents that they may request, and the LEA will provide, information regarding whether professionals are highly effective, including the qualifications of the student's teachers and paraprofessionals. *See* 20 U.S.C. § 6312(e)(1)(A).
- Title I schools must notify parents if their student(s) has/have been taught for four or more consecutive weeks by a teacher who does not meet the applicable state certification requirements at the grade level and subject area in which the teacher has been assigned. *See* 20 U.S.C. § 6312(e)(1)(B)(ii).





Other Requirements

- Equitable Services (if applicable):
 - LEAs who receive Title I funds provide equitable services to eligible private school students, their teachers, and their families
- Schoolwide Comprehensive Plan:
 - An eligible school operating a schoolwide program shall make the comprehensive plan available to the LEA, parents, and the public (InformTN).
- Homeless Set-Aside:
 - LEAs will be required to set aside funds for children and youth experiencing homelessness.





Other Requirements

- Report Cards for State Assessments

- Each LEA must prepare and disseminate an annual report card. Generally, the state or district must include on its report card information about public schools related to student achievement, accountability, teacher qualifications and other required information, as well as any other information that the state or district deems relevant. *See* 20 U.S.C. § 6311(h)(2).
- These report cards must be concise and presented in an understandable and uniform format accessible to persons with disabilities and, to the extent practicable, provided in a language that parents can understand. In Tennessee, these requirements are met through the state’s report card. *See* 20 U.S.C. § 6311(h)(2)(B).



Other Requirements

- Testing Transparency/Participation

- LEAs are required to notify the parents of each student attending any school receiving Title I, Part A funds that parents may request information regarding student participation in any assessments mandated by 20 U.S.C. § 6311(b)(2) and by the State or LEA. The LEA will provide the parents on request, the information regarding the assessments including a policy, on student participation. *See* 20 U.S.C. § 6312(e)(2)(A).
- Additionally, the LEA must make widely available through public means for each grade served by the LEA, information on each assessment required by the State to comply with 20 U.S.C. § 6311, other assessments required by the State, and assessments required by the district. *See* 20 U.S.C. § 6312(e)(2)(B).



Other Requirements

- Accountability for English Learner (EL) Subgroup:
 - Each state must establish ambitious, state-designed, long-term goals, which include measures for ELs for proficiency on content assessments and increase in the percentages of ELs making progressing achieving ELP within a state-determined timeline. 20 U.S.C. § 6311(c)(4)(A)(ii).
 - LEAs receiving Title I funds under ESSA are held accountable for this measure rather than only districts receiving Title III funds.
 - Information about parental rights detailing the right of parents to have their child immediately removed from such program upon their request and the options that parents have to decline to enroll their child in such program or to choose another available program or method of instruction. See 20 U.S.C. § 6312(e)(3)(A)(viii).



Other Requirements

- Accountability for English Learner (EL) Subgroup, Continued:
 - Crossover Requirements - An LEA using Title I, Part A funds or Title III, Part A funds to provide a Language Instruction Educational Program (LIEP) must inform parents of an English learner, no later than 30 days after the beginning of the school year of:
 - the reasons for the child’s identification as an English learner;
 - the child’s level of English proficiency, how such level was assessed, and the status of the child’s academic achievement;
 - the instructional methods used in the program;
 - how the program will meet the educational strengths and needs of their child;
 - how such program will help their child learn English and meet the academic achievement standards for grade promotion and graduation;
 - the specific exit requirements for the program; (vii) in the case of a child with a disability, how such program meets the objectives of the individualized education program of the child, as described in section 614(d) of the Individuals with Disabilities Education Act (20 U.S.C. § 1414(d)); and
 - information pertaining to parental rights.
- See 20 U.S.C. § 6312(e)(3)(A).*



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Closing

Resources

- **Rank and Serve:**
 - [Within-district-allocation](#)
 - [Charter Schools Nonregulatory Guidance Allocation of Funds to New and Expanding Charter Schools](#)
- **Comparability:**
 - [Comparability Overview Slides](#)
 - [2023-24 Comparability Procedures Guide 2023-09-06](#)
 - [EIS Staff Data for Comparability and Checking EIS Staff Data 2023-24 2023-08-28](#)
 - [EIS Staff Data for Comparability FAQs 2023-24 2023-08-28](#)
 - [Title I Fiscal Issues \(MOE, Comparability, Supplement not Supplant, Carryover, Consolidating Funds\)](#)
- **SNS:**
 - [U.S. Dept. of Education: Supplement Not Supplant Non-Regulatory Informational Document 2019-06](#)
 - [FAQ Supplement not Supplant 2022-03-01](#)

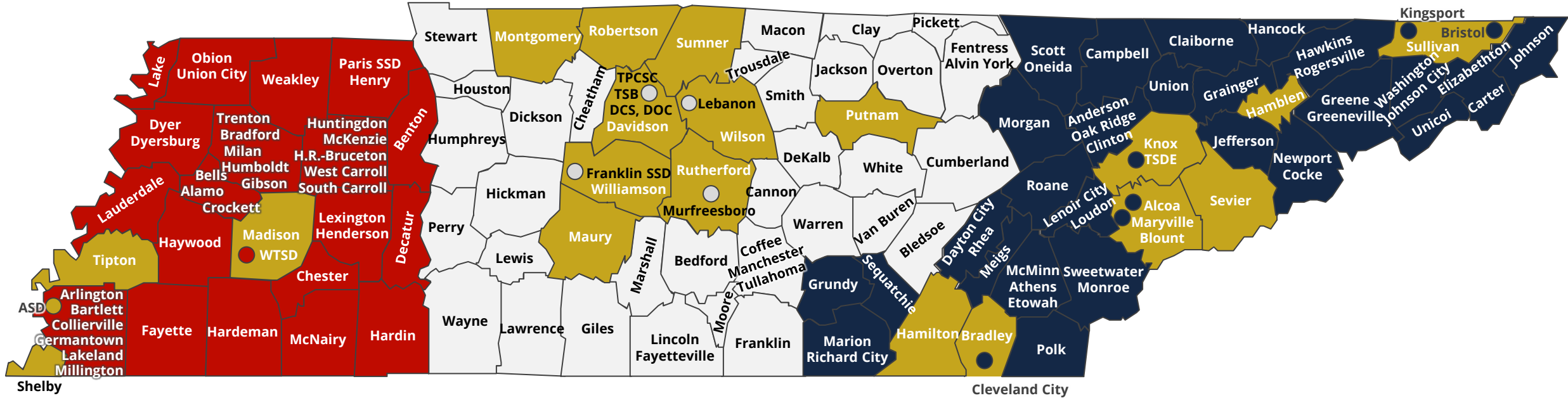


Resources

- **Parent and Family Engagement:**
 - [Title I Parent Involvement Guidance](#)
 - [Title I Parent and Family Engagement Requirements and Resources Presentation](#)
- **Other Requirements:**
 - [ESEA Title I Parent Notification](#)
 - Tennessee State Board of Education Rule 0520-01-19
 - [Title I Services to Eligible Private School Students Guidance](#)
 - [A Guide to District Support for School Planning](#)
 - [A Parent Guide to State and Local Report Card](#)



FPO Divisional Coordinators



West

ESEA: Lynn Dotson
 IDEA: Janet Michelle Mansfield

Middle

ESEA: Alisha Gilmore
 IDEA: Tracey Jones

East

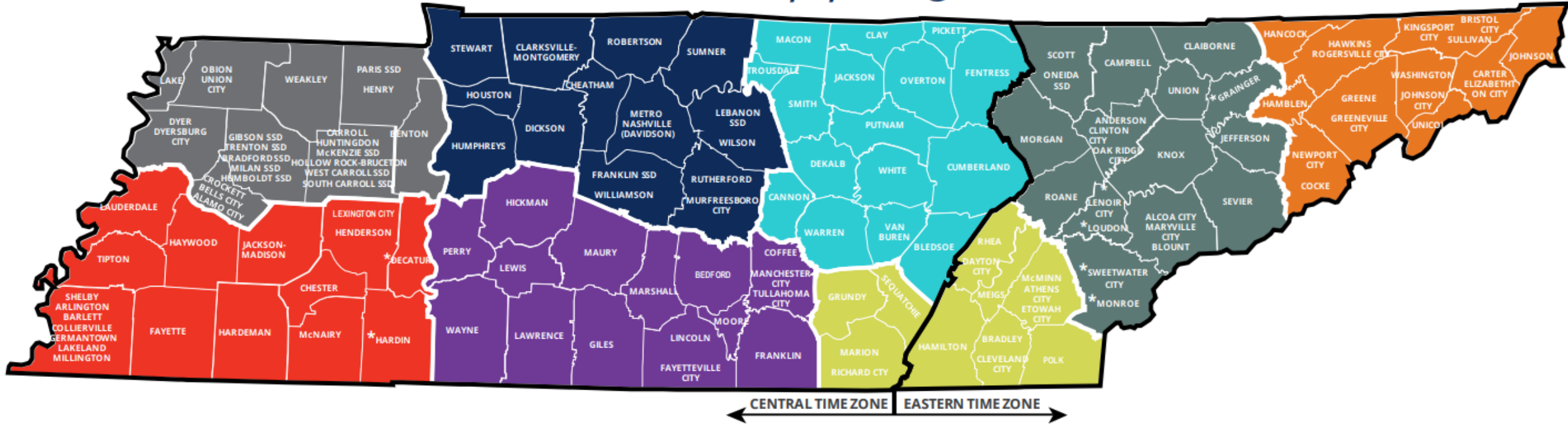
ESEA: Henry LaFollette
 IDEA: Melanie Lamberson

20 Districts with Largest Enrollment

ESEA: Heather Farley
 IDEA: Jamie Eldridge

Regional Finance Consultant District Map

As of 10/1/2023



Northwest	Southwest	Mid Cumberland	Upper Cumberland	South Central	Southeast	East TN	First TN
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*Districts that are assigned to a finance consultant in a different CORE region.



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Thank You!

Contact Info or Questions?

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<http://www.comptroller.tn.gov/hotline>