

2025
FEDERAL
PROGRAMS
INSTITUTE

MEMPHIS ★
TO
★ **BRISTOL**
Federal Programs
Driving Local Change

Title I, Part A Overview and Deep Dive into Rank and Serve

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Agenda

- Purpose of Title I, Part A
- Ways to Serve Title I Schools
 - Target Assistance
 - Schoolwide
- School Eligibility with School Nutrition
- Eligibility, Ranking, and Allocation of Funds to Eligible Schools
- Ranking and Serving Examples
- Resources



Purpose of Title I, Part A Funds

Purpose of Title I, Part A Funds

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



Purpose of Title I, Part A Funds

- School-based
 - Funds are to be pushed down (spiraled) to schools in order to address the unique needs of the schools.
 - A limited amount of funds are to be reserved at the district level.
 - Expenditure of funds **must** be aligned with school plans (InformTN).
 - Two ways to serve schools – School Wide and Targeted Assistance
- 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.



Ways to Serve Title I Schools

- Targeted Assistance
- School Wide

Targeted Assistance Schools

- Must identify what students will be served under Title I
 - Students identified as failing or at risk of failing State standards
 - Services are not based on poverty
- Must ensure Title I funds are used solely to benefit identified students.



Targeted Assistance Allowability

Example:

- TCAP scores demonstrate that students in a Targeted Assistance are struggling to meet reading standards in 3rd grade
- School purchases ELA workbooks for all 3rd-grade classes (100 students)
- 50/100 students are Title I students
- Title I can pay for 50% of those workbooks
 - Assumes increasing English proficiency is in the school's InformTN plan.
 - Assumes workbooks are reasonable in cost



Schoolwide Programs

- Combine Federal, State, and/or local programs to upgrade the entire educational program
- All students in the schoolwide school are eligible for Title I services
- Not required to provide supplemental services to identified children



Schoolwide Programs Plan

1. Plan is developed each year under InformTN
2. Developed with appropriate stakeholders, including parents and other members of the community (ensure to include teachers, principal(s), school leaders, paraprofessionals, etc.)
3. Shall be regularly monitored and revised as necessary based on student needs
4. Is available to the public in an understandable format and, to the extent practicable, in a language parents can understand (InformTN ensures this)
5. Is developed in coordination with other Federal, State and local services, resources and programs
6. Is based on a comprehensive needs assessment
7. Includes strategies to address school needs





Schoolwide Program Plan

- Schoolwide plan must meet the intent and purposes of Title I, Part A and any other combined programs.
 - Serving students with the greatest educational need.
 - All funds must be spent in accordance with the approved schoolwide plan (InformTN).

School Wide Allowability

Example:

- TCAP scores demonstrate that students in a SW school are struggling to meet English Language Arts standards in 3rd grade
- School purchases ELA workbooks for all 3rd grade classes (100 students)
- All students are Title I students
- Title I can pay for 100% of those workbooks
 - Allowable if increasing ELA proficiency is in the school's SW plan
 - Allowable if workbooks are reasonable in cost



School Eligibility and Ranking with School Nutrition

Data Used to Determine Eligibility

- Schools are deemed eligible for Title I, Part A 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
- A combination of any of the above, utilizing the same month and year, with duplications removed



Eligibility for School Meals

Eligibility for School Meals

- Each year, the U.S. Department of Agriculture (USDA) provides updated [income eligibility guidelines](#) to determine eligibility for free or reduced-price meals.
- Income guidelines are effective from July 1 to the following June 30.
- Households that have an income up to 130 percent of the federal poverty level are eligible for free meals.
- Households that have an income between 130 and 185 percent of the federal poverty level are eligible for reduced-price meals.

[USDA's Eligibility Manual for School Meals](#) is an excellent resource



Qualifying for School Meals

- Each school year, families are required to submit a household application for Free and Reduced-Price School Meals.
- The local school nutrition team processes the application to determine if a child is eligible for free or reduced-price meals.

Prototype Household Application for Free and Reduced Price School Meals

APPLY ONLINE:
RETURN TO (School/District Name):
ADDRESS:

Complete one application per household. Please use a pen (not a pencil).

STEP 1

List ALL children, infants, and students up to and including grade 12. Attach another sheet of paper if you need space for more names.

List ALL children in the household. Do not forget to list infants, children attending other schools, children not in school, and children not applying for benefits. This includes children not related to you in your household.

Child's First Name	MI	Child's Last Name	Grade	Foster Child	Migrant	Runaway	Homeless
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Check all that apply

If you checked any of these boxes, please refer to the Application Instruction's Step 1: Part C & Part D.

STEP 2

Do any household members (including you) participate in: SNAP, TANF, or FDIPIR?

☐ NO → Go to STEP 3. ☐ YES → Write case number here and proceed to STEP 4.

CASE NUMBER (NOT EBT NUMBER):
Write only one case number in this space.

STEP 3

List ALL household members and income for each member (before taxes and deductions)

A. All Adult Household Members (Anyone who is living with you and shares income and expenses, even if not related, including you.)
List all Adult Household Members not listed in STEP 1 (including yourself) even if they do not receive income. For each Household Member listed, if they receive income, report total gross income (before taxes and deductions) for each source in whole dollars (no cents) only. If they do not receive income from any source, write '0'. If you enter '0' or leave any fields blank, you are certifying (promising) that there is no income to report.

Name of Adult Household Members (first and last)	Earnings from Work	How often received?				Public Assistance, Child Support, Alimony	How often received?				Pensions, Retirement, Social Security, SSI, VA Benefits, All Other	How often received?							
		Weekly	Every 2 Weeks	2x Month	Monthly		Annually	Weekly	Every 2 Weeks	2x Month		Monthly	Annually	Weekly	Every 2 Weeks	2x Month	Monthly	Annually	
	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	\$		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Total Household Members (Children and Adults)

Last Four Numbers of Social Security Number of Primary Wage Earner or other Adult Household Member (If Applicable)

Check if no Social Security Number

Please see application's back for list of income sources.

B. Child Income
Sometimes children in the household earn or receive income. Include the TOTAL income (before taxes and deductions) received by ALL children listed in STEP 1 here.
Child Income \$
How often received? Weekly Every 2 Weeks 2x Month Monthly Annually

STEP 4

Contact information and adult signature. RETURN COMPLETED FORM TO YOUR CHILD'S SCHOOL: Insert school address here

I certify (promise) that all information on this application is true and that all income is reported. I understand that this information is given in connection with the receipt of Federal funds, and that school officials may verify (confirm) the information. I am aware that if I purposely give false information, my children may lose meal benefits, and I may be prosecuted under applicable State and Federal laws.

Print Name of Adult Signing the Form Signature of Adult Today's Date

Mailing Address (if available) City State Zip Phone (optional) Email (optional)

Return completed form to your child's school.



Duration of Eligibility

- Once an eligibility determination is made, a child's eligibility status remains in effect for the remainder of the school year.
- At the start of the following school year, children retain their previous year's eligibility for 30 operating days or until a new determination is made, whichever comes first.
 - Determinations are made via approval or denial of a household application for meal benefits or via direct certification.
- Eligibility from the 30-day carryover is temporary and should not be included in counts of economically disadvantaged students.



Extended Eligibility

- If one child or adult in the household is eligible for free or reduced-price meals based on a household application or participation in an assistance program (SNAP, TANF, Medicaid), the meal benefits are extended to all children in the household.
- If a child is eligible for free meals by being identified as foster, homeless, migrant, or runaway, the eligibility is not extended to all children in the household.

Community Eligibility Provision (CEP)

- Some sites or districts operate CEP and all students receive meals for no cost.
- Sites operating CEP are not allowed to use school nutrition funds to process household applications.
- Sites operating CEP may implement an optional household survey to capture household income and other information



Direct Certification

Direct Certification

Direct certification is a ***process*** that allows school food authorities (SFAs) and/or local education agencies (LEAs) to certify children as eligible for free or reduced-price meal benefits utilizing data from other means-tested programs, eliminating the need for an application.



Direct Certification Process



Source Data: Department of Human Services (DHS)

- Receive information regarding participation in Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF)
 - TANF is known as Families First in Tennessee.
- Participation in one of these programs confers automatic eligibility for free meals.
- Data is received from DHS weekly.

Source Data: TennCare

- TennCare utilizes information received on Medicaid applications to determine if a household is eligible for free or reduced-price meals.
- Participation in Medicaid does not automatically confer eligibility in the school meals program; some individuals or households can receive Medicaid benefits with an income greater than 185 percent of the poverty level.
- Data is received from TennCare monthly.

Source Data: Department of Children's Services (DCS)

- DCS provides a list of students who have entered into foster care.
- A **foster child** is a child whose care and placement is the responsibility of a State or local welfare agency or who is placed with a caretaker household by the court.
- The foster definition only applies to foster children who are formally placed by the State welfare agency or court and does not apply to informal arrangements.
- Data is received from DCS monthly.



Other Source Categorical Eligibility

- **Homeless child** is identified as lacking a fixed, regular, and adequate nighttime residence under the McKinney-Vento Homeless Assistance Act or as residing in a homeless shelter.
- **Migrant child** is identified by the local educational liaison when he or she meets the definition found in section 1309 of the Elementary and Secondary Education Act of 1965, codified at 20 U.S.C. § 6399.
- **Runaway child** is identified by the local educational liaison through a program under the Runaway and Homeless Youth Act.



Other Source Categorical Eligibility

- **Foster (locally identified) child** is a child whose care and placement is the responsibility of a state or local welfare agency or who is placed by a court order with a caretaker household.
- **Head Start or Even Start child** is a child who is enrolled in one of the federally funded programs of the same name.



Other Direct Certification Data Information

- All external partners send a new list of eligible students as of each July 1.




What is required for a direct certification match?

- Names of children or household members currently certified to receive benefits
- At least one additional piece of identifying information to match the enrolled to student to source data:
 - Child(ren)'s birthdate
 - Address
 - Parent or guardian names
 - Child's social security number, if available
 - Gender

School Meal Benefit Hierarchy

The hierarchy for providing school meal benefits is implemented as follows:

- 
- 1. SNAP (Supplemental Nutrition Assistance Program)
 - 2. TANF (Temporary Assistance for Needy Families)
 - 3. Other source categorically eligible: foster, homeless, migrant, runaway
 - 4. Medicaid Free
 - 5. Free by Application
 - 6. Medicaid Reduced
 - 7. Reduced by Application

Understanding School Nutrition Data

Free and Reduced-Price Lunch

- LEA determines month and year of data from previous school year
- Percentage of students eligible for free and reduced-price lunch includes **all** students approved to receive free and reduced-price meal benefits
- Data sources included:
 - Household applications
 - All direct certification data sources, both free and reduced eligibility
 - SNAP
 - TANF
 - Medicaid Free
 - Medicaid Reduced
 - Other categorically eligible (migrant, homeless, foster, runaway)
- No multiplier can be used

Direct Certification Only

- LEA determines month and year of data from previous school year
- Includes all students direct certified for free and reduced-price meals
- Data sources included
 - SNAP
 - TANF
 - Medicaid Free
 - Medicaid Reduced
 - Other categorically eligible (migrant, homeless, foster, runaway)

Direct Certification Plus Multiplier

- LEA determines month and year of data from previous school year
- Includes all students direct certified for **free** meals
- Data sources included
 - SNAP
 - TANF
 - Medicaid Free
 - Other categorically eligible (migrant, homeless, foster, runaway)
- Percentage of directly certified free students is multiplied by 1.6 for a poverty estimate
 - The 1.6 multiplier is an estimate for the amount of students that would be eligible for free and reduced-price meals with applications

Disclosure of Information

Confidentiality Requirements

- Information provided by families on the household income application and obtained via direct certification can only be used for determining eligibility for meal benefits.
- In limited situations, children's free and reduced-price meal eligibility information may be disclosed to programs, activities, and individuals, as specifically authorized under the NSLA.

Section 9(b)(6) of the NSLA, 42 U.S.C. § 1758(b)(6) and regulations found at 7 C.F.R. § 245.6

Disclosure Requirements

- National School Lunch Act (NSLA) allows persons directly connected with the administration or enforcement of certain programs or activities to have access to children’s eligibility information.

Recipient of Information	What May be Disclosed	Requirements
Federal education programs	Eligibility status only	Prior notice and consent not required
State education programs administered by a state agency or LEA	Eligibility status only	Prior notice and consent not required
Local education programs	No eligibility information, unless parental or guardian consent is obtained	Parental or guardian consent



Eligibility, Ranking, and Allocation of Funds to Eligible Schools

School 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% served require LEAs to utilize the 125% rule.

School Eligibility Determination

- If no standard rules make a school eligible for Title I, Part A, 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 commissioner of 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 of being grandfathered in, it is no longer eligible for Title I services. However, a waiver can be applied for with the commissioner of FPO, allowing the school to be Title I for two more years.

School Eligibility Determination

- **Schools Over 75%**

- After an LEA has served all of 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 are still given priority, but high schools between 50% and 74% are given priority over all other schools.

School Eligibility Determination

- Once LEAs have reviewed poverty percentages for all* schools and determined how to rank the schools in order to:
 - Identify schools eligible for Title I funding
- Several options are available:
 - Grade span ranking
 - District-wide ranking
 - Exception
 - Less than 1,000 students enrolled in the LEA
 - Single attendance area

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

Grade Span Ranking

- An LEA may group schools with similar grade spans together and consider them separately from other schools.
 - K-5
 - 6-8
 - 9-12
- An LEA can place a priority on any individual grade span when allocating funds.
- This allows flexibility to identify a school as eligible even if it has a lower poverty percentage than another school in a different grade span.

District-wide Ranking

- LEAs may simply rank all schools, regardless of grade span, based on poverty percentage.
- Specific grade levels cannot be targeted because schools are all considered in one large group.

Allocating Funds

- LEAs must allocate funds to eligible schools on a per pupil basis.
- For every 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 to 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 in order to spread funds across all/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.
 - 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.
- This calculation is based on the total allocation within the budget.

Skip School Requirement

May skip any school in the ranked list, but only if:

- Comparability is met;
- The skipped school receives supplemental State/local funds used in Title I-like program; and
- The amount of the supplemental State/local funds meet or exceed the amount that would be received under Title I.

*Reminder to ensure skipping a school does not conflict with supplement, not supplant.

School Eligibility Determination Overview

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.

Ranking and Serving Examples

Example/Activity

Scenario:

- Assume these schools have been determined to be eligible using proper ranking and eligibility rules (grade span).
- Questions to answer:
 - 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?
 - 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 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	57%	2	N
Oak High School	9-12	SW	68%	3	Y
District Average Poverty			67%		

Common Mistakes

- Forgetting to serve all schools over 75%
- Forgetting the schools that drop below 35% requires a 125% PPA amount
- Forgetting to change the status of a school that drops below 40% to grandfathered in for the first year.
- Failing to serve all schools that qualify when grade span ranking
- Not ordering schools properly when grade span ranking on the school eligibility page



Resources

ePlan Resources

- [Within-District Allocations Under Title I, Part A](#)
- [Charter Schools Nonregulatory Guidance Allocation of Funds to New and Expanding Charter Schools](#)

ESSA Divisional Coordinators

West		Middle		East		20 LEAs with Largest Student Enrollment
ESEA: Lynn Dotson IDEA: Janet Michelle Mansfield		ESEA: Alisha Gilmore IDEA: Megan Mysinger		ESEA: Henry LaFollette IDEA: Melanie Lamberson		ESEA: Heather Farley IDEA: Jamie Eldridge
Alamo	Hollow Rock-Bruceton	Alvin C York Institute	Lebanon SSD	Alcoa	Lenoir City	ASD
Arlington	Humboldt City	Bedford Co.	Lewis Co.	Anderson	Loudon Co.	Blount Co.
Bartlett	Huntingdon SSD	Bledsoe Co.	Lincoln Co.	Athens	Marion Co.	Bradley Co.
Bells	Lake Co.	Cannon Co.	Macon Co.	Bristol	Maryville	Davidson Co. (MNPS)
Benton Co.	Lakeland	Cheatham Co.	Manchester City	Campbell Co.	McMinn Co.	Hamblen Co.
Bradford	Lauderdale Co.	Clay Co.	Marshall Co.	Carter Co.	Meigs Co.	Hamilton Co.
Chester Co.	Lexington	Coffee Co.	Moore Co.	Claiborne Co.	Monroe Co.	Knox Co.
Collierville	McKenzie	Cumberland Co.	Murfreesboro City	Cleveland	Morgan Co.	Madison Co.
Crockett Co.	McNairy Co.	DeKalb Co.	Overton Co.	Clinton	Newport	Maury Co.
Decatur Co.	Milan	Dept. Children's Services	Perry Co.	Cocke Co.	Oak Ridge	Montgomery Co.
Dyer Co.	Millington	Dept. of Correction	Pickett Co.	Dayton City	Oneida	Putnam Co.
Dyersburg City	Obion Co.	Dickson Co.	Smith Co.	Elizabethton	Polk Co.	Robertson Co.
Fayette Co.	Paris SSD	Fayetteville City	Stewart Co.	Etowah	Rhea Co.	Rutherford Co.
Germantown	South Carroll SSD	Fentress Co.	TN Pub. Chart. Sch. Com.	Grainger Co.	Richard City	Sevier Co.
Gibson Co. SD	TN School Deaf (W)	Franklin Co.	TN School for the Blind	Greene Co.	Roane Co.	Shelby Co.
Hardeman Co.	Trenton	Franklin SSD	Trousdale Co.	Greeneville	Rogersville	Sullivan Co.
Hardin Co.	Union City	Giles Co.	Tullahoma City	Grundy Co.	Scott Co.	Sumner Co.
Haywood Co.	Weakley Co.	Hickman Co.	Van Buren Co.	Hancock Co.	Sequatchie Co.	Tipton Co.
Henderson Co.	West Carroll SSD	Houston Co.	Warren Co.	Hawkins Co.	Sweetwater	Williamson Co.
Henry Co.		Humphreys Co.	Wayne Co.	Jefferson Co.	TN School Deaf (E)	Wilson Co.
		Jackson Co.	White Co.	Johnson City	Unicoi Co.	
		Lawrence Co.		Johnson Co.	Union Co.	
				Kingsport	Washington Co.	

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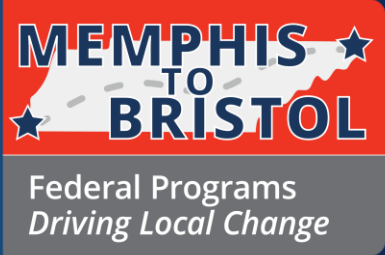
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3:20–4:30 p.m. ET 2:20–3:30 p.m. CT	Educational Stability for Youth in Foster Care Jackie Jacobson
	Section 504 Responsibilities & Requirements Shaundraya Hersey & Courtney Boykin



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