

## **Title I, Part A Appendix**

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## **History of Title I**

Title I is part of the Elementary and Secondary Education Act (ESEA) that was introduced in 1965. The most recent version of Federal Education Legislation involving Title I funding is ESSA, or the Every Student Succeeds Act of 2015. The Every Student Succeeds Act emphasizes equity, annual assessments, evidence-based interventions, and accountability.

## **Required Documentation**

Documentation is a very important component of any Title I program. The IDOE has created a landing page for the Required Documentation for a Title I, Part A program. Visit the [Title I Resources](#) web page for more information regarding the required documentation for Title I, Part A programs.

## **Title I Data Reporting**

The Collection Summary Table at <https://www.doe.in.gov/it/data-collection-help> has different tabs for each type of school, such as public, accredited nonpublic, choice voucher, etc. The tabs are at the bottom.

It also has content specialists that will help guide program administrators to find out the contact person in the IDOE who can answer questions and provide technical assistance. All Title I data reports collect information that the IDOE must provide to the U.S. Department of Education.

## **Title I Part A Annual Reports**

The chart below is intended to be used as a quick reference and as a guide for the reporting requirements for Title I, Part A. It is not to be used as an exhaustive list.

Type	Purpose and Description	General Time Frame*
<b>Final Expenditure Report</b>	This report captures the fiscal year end expenditures for Title I program, which will populate the carryover (LEA & nonpublic) for the following fiscal year.	October 30
<b>DOE- TI</b>	This report collects data regarding the many different types of student services funded through Title I. This report collects data for the previous school year.	Data is typically due beginning July to mid-September. Check Due Dates for exact date.
<b>Staffing Report</b>	This report collects data for the previous school year. These counts represent staff in the school corporation/district or charter school funded by Title I during the regular school year job category.	Data is typically due beginning September to late October. Check Due Dates each year for exact date.
<b>Comparability</b>	<p>This report collects data as a compliance measure to ensure that the LEA is providing services in school attendance areas that are comparable to those provided in non-Title I schools.</p> <p>LEAs should be completing the report ANNUALLY, but districts actually submit every other year for IDOE review based on whether the corporation number ends in 0 or 5.</p>	Data is typically due late October. Check Due Dates each year for exact date.
<b>N&amp;D Annual Survey Count</b>	This report collects data on the number neglected or delinquent children in residential institutions or community day programs.	Data is typically due beginning November to mid-December.
<b>Title I, Part D Annual Report</b>	This report is for school corporations/districts using Title I dollars to service students residing in delinquent institutions. This report is to document the program activities and outcomes for the prior school year.	Data is typically due in November.
<p><b>* Specific time frames may change from year-to-year. Contact your Federal Grant Specialist for specific due dates and collection windows.</b></p>		

## Appropriate Use of Staff Members

The purpose of Title I is to provide instruction to Title I students to enable them to meet high standards expected of all children. Title I classes may not be cancelled to allow Title I instructional staff to be substitute teachers for other staff. Substitute teaching may

only be performed by the Title I personnel during non-teaching period, such as during planning periods. Furthermore, before an LEA uses Title I personnel for substitute teaching during planning periods for any emergency situation, it must ensure that similarly situated personnel are also used for substituting teaching. For example, it would be unallowable to narrowly define similarly situated so that few other types of personnel would qualify, and as a result, Title I personnel would carry a disproportionate share of the emergency substitute teaching responsibilities.

### **Appropriate Use of Title I Staff Members Chart**

<b>Title I Teacher Duties</b>	<b>Title I Aide/Paraprofessional Duties</b>
May supervise Title I aide/paraprofessional	Aide/Paraprofessionals must be working under the direct supervision of and in close and frequent proximity to a certified public school teacher at all times.
Holds caseload of all Title I students	Provides instructional support to the Title I teacher. Title I aides/paraprofessionals may not have their own caseload of students.
Pulls out or assists students in the classroom with supplementary instruction beyond the classroom instruction.	Provides further reinforcement of skills as prescribed by the Title I or classroom teacher.
Reinforce or re-teach vocabulary words or math concepts introduced by the classroom teacher.	Reinforces vocabulary words covered by the Title I or classroom teacher and assists in skills that aid in understanding the math concepts as prescribed by the teacher.
Evaluates the progress of all Title I students and designs and prepares student progress reports.	Organizes results of student assessments and files records for the Title I teacher, assists in typing up progress reports and sending them to parents.
Prescribes the lessons that the students will work on during Title I services, in conjunction with general education teachers and a review of available data.	Helps students as they complete lessons delivered by the Title I teacher or the classroom teacher (under direction supervision and in close proximity) meets individually with specific Title I students.

<p>Performs all student selection requirements including testing and making the final lists of students selected for Title I participation.</p> <p><i>TAS – Title I teachers cannot provide testing in a TAS for the Title I program as that would require them to work with all students.</i></p>	<p>Assists the Title I teacher in the student selection process by organizing results, creating parent permission slips, compacts, and other info to send home for identified students.</p> <p>Aides/paraprofessionals may not administer tests, but could provide supervision while students test.</p>
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## Appropriate Use of Title I and Title III Funded Supplemental Programs for ELs:

Due to the enactment of Every Student Succeeds Act (ESSA), an English learner indicator to measure progress in achieving English language proficiency must be included in state accountability at the school level as part of Title I. This accountability rule does not apply to Title I schools only, or just LEAs that accept Title III, but all public schools within the state. Section 1112 (b)(1)(E)(ii) of ESEA states “the local education agency will coordinate and integrate services provided under this part [Title I] with other educational services at the local educational agency or individual school level, such as services for children with limited English proficiency, children with disabilities, migratory children, neglected or delinquent youth, Indian children, homeless children, and immigrant children in order to increase program effectiveness, eliminate duplication, and reduce fragmentation of the instructional program.”

Title I and Title III programs can carry out the same purpose for English learners (i.e. providing language development), but Title III must extend or be in addition to Title I services. For more information regarding this topic visit the IDOE website for access to [English Learners and Title I, Part A: Program Design and Coordination of Local, State, and Federal Funds](#).

## Improper Use of Title I and Title III Funded Supplemental Programs for ELs:

- 1) Title I or Title III services supplant or take the place of the district’s core EL program required by Lau 1974, Castaneda 1981;
- 2) District or school uses funds to pay for something that was paid for in the previous year with other federal, state, or local funds (an LEA may be able to refute this presumption, however, if it can demonstrate that those services could not be continued due to state/local fund budget constraints);
- 3) Title III funds utilized for programs/services required by other federal, state or local laws. Example: If a student is eligible for Title I and Title III, then Title III cannot be used to take the place of services that the student was already eligible for under Title I; the student would be eligible for both.

The document [Title I and English Learners](#) will provide guidance on serving eligible English learners (ELs) through Title I. Educators can use this document as a resource to provide purposeful support to English learners, eligible for Title I, in order to meet the general provisions under this program of improving the academic achievement of the disadvantaged students while avoiding supplanting of other programs, such as Title III, that serve English learners.

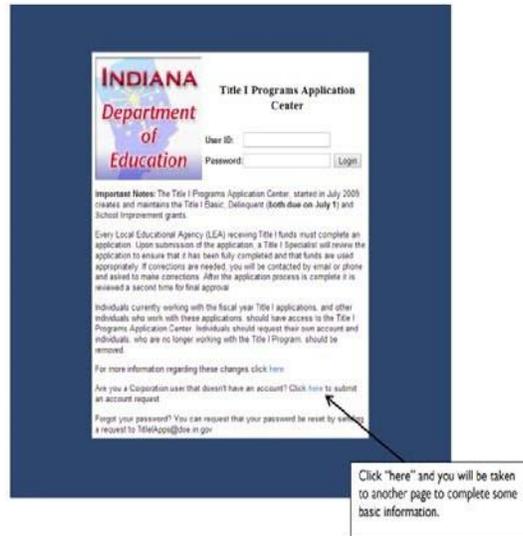
## **Title I Funded Non-Certified Instructional Staff Members**

Instructional Staff members that are non-certified must be in “Close and frequent proximity and under the direct supervision of a certified teacher at all times.” This does not mean that a certified teacher can simply write lessons for instructional assistants to deliver on their own. This definition requires that the instructional assistants are in the actual presence of the certified teacher (e.g. same classroom or work area) so that the teacher may redirect the assistant or clarify instruction for students, as needed. When writing the Title I grant application, be sure that descriptions for paraprofessionals and non-certified staff members include this language.

## **Title I – Part A Application Information**

Title I Application is an online application, which can be found here: <https://title1.doe.in.gov/login.aspx>. Please read through the information on the application log in screen as it contains information about the application center. You will need a login and password in order to access the grant. If you do not have a login and password, you will need to select the blue “here” button at which point you will be directed to another page to provide some basic information.

It is recommended your corporation have a separate login for the program administrator, superintendent, treasurer, and anyone who is involved with the Title I application. Logins and passwords should not be “passed on” to new employees. Rather, each new employee who will be working on the Title I grant should register for their own login and password.



## Indirect Cost

Indirect costs represent the time and effort of the burden of administering federal programs, which are hard to quantify on a regular basis. The U.S. Office of Management and Budget (OMB) issued the *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* on December 26, 2013, and codified the regulation within Title 2, Part 200 of the Code of Federal Regulations (2 CFR 200). This document includes general administrative requirements applicable to federally-funded programs, including but not limited to: the cost principles and standards for determining the allowability of costs incurred under federally-funded programs administered by state and local governments; and provisions for determining indirect cost rates for grantees and sub-grantees of federal awards.

It provides that federal programs shall bear their fair share of indirect costs except when legislation explicitly restricts reimbursement of such costs. LEAs are required to have an approved indirect cost allocation plan and indirect cost rate in effect in order to recover any indirect costs related to federal grants and contracts. If a district does not wish to recover indirect costs for federal grants and contracts, it is not required to do so. US Department of Education publication, "Indirect Cost Determination Guidance for State and Local Government Agencies," is used by state education agencies as the guide for cost principles and procedures for establishing cost allocation plans and indirect cost rates for grants and contracts issued by the federal government.

(1) The indirect cost rate is applied to the actual modified total direct cost amount expended, not to the total grant award, to determine the indirect cost dollars to be recovered, subject to the approved program budget. Modified total direct costs (MTDC) are all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and subawards and subcontracts up to the first \$25,000 of each



Looking at it another way, indirect costs are those costs that are not classified as direct. Direct costs can be identified specifically with particular cost objectives such as a grant, contract, project, function or activity. Direct costs generally include:

- Salaries and wages (including vacations, holidays, sick leave, and other excused absences of employees working specifically on objectives of a grant or contract – i.e, direct labor costs)
- Other employee fringe benefits allocable on direct labor employees
- Consultant services contracted to accomplish specific grant/contract objectives
- Travel of (direct labor) employees
- Materials, supplies and equipment purchased directly for use on a specific grant or contract

## **Homeless Set Aside**

ESSA requires that each LEA has a “reasonable amount” set aside for the needs of the homeless population. For further guidance about what amount is considered “reasonable” for your district, reference the Homeless template within your Title I grant or contact your grant specialist at the Indiana Department of Education.

The homeless set aside funds may be used for many of the needs of the homeless students in the school, as long as the expenses are reasonable, allocable, and necessary for the success of a homeless student in school. A few examples of approvable purchases with homeless set-aside funds include: dental visits, doctor visits, school supplies, and other instructional supplies like backpacks, notebooks, pens, pencils, food, and other school supplies.

## **Pay Differential**

Some school districts use a method called pay differential to equalize the salaries of staff at different schools, in order to maintain equity in funding at the district level. For example, School A may have a veteran Title I teacher with a salary of \$70,000, while School B has a beginning Title I teacher with a salary of \$40,000.

In order to establish equity between the two schools, the school district may budget a \$30,000 portion of the teacher’s salary at School A at the administrative level of the Title I budget. With the remainder of the School A’s teacher salary of \$40,000 at the school budget level, it appears that School A and School B are receiving equal funding for their teaching staff. Please note: the teacher at School A in the example would still receive the same salary, and the funding for their salary would come out of two areas in the budget (the administrative budget, and the school budget, instead of just one.)

Part of the expectation for pay differential is to place the base amount that you would pay for a teacher’s salary. For more information and guidance, contact your Federal Grants Specialist for more guidance.

## Pay Differential Example

<u>Teacher Name</u>	<u>Building</u>	<u>Salary</u>	<u>Comparison Salary</u>	<u>Salary Differential</u>	<u>Benefits</u>	<u>Comparison Benefits</u>	<u>Benefits Differential</u>	<u>Total Set-Aside for Differentials</u>
<u>Teacher 1</u>	Building 1	\$24,000	\$24,000	\$0	\$6,9860	\$6,9890	\$0	
	Building 1 Portion of Set-Asides			\$0			\$0	\$0
<u>Teacher 2</u>	Building 2	\$25,500	\$24,000	\$1,500	\$7,395	\$6,960	\$435	
<u>Teacher 3</u>	Building 2	\$26,800	\$24,000	\$2,800	\$7,395	\$6,960	\$812	
	Building 2 Portion of Set-Asides			\$4,300			\$1,247	\$5,547
<u>Teacher 4</u>	Building 3	\$28,000	\$24,000	\$4,000	\$8,120	\$6,960	\$1,160	
<u>Teacher 5</u>	Building 3	\$29,500	\$24,000	\$5,500	\$8,555	\$6,960	\$1,595	
<u>Teacher 6</u>	Building 3	\$33,000	\$24,000	\$9,000	\$9,000	\$9,570	\$2,610	
	Building 3 Portion of Set-Asides			\$18,500			\$5,365	\$23,865
<b>TOTAL</b>		\$166,800	\$144,000	\$22,800	\$48,372	\$41,760	\$6,612	\$29,412

### Determine Salary Differential as an Administrative Expense

An LEA may consider variations in personnel costs, such as seniority pay differentials or fringe benefit differentials, as LEA-wide set-aside costs, rather than as part of the funds allocated to school attendance areas or schools. This policy would have to be applied consistently to staff throughout the LEA. Documentation must be maintained on the calculation of these set-asides.

The following is an example of a way to determine the salary differential set-aside if there are 3 elementary buildings within the district. There are a total of 6 Title I teachers. The salary of the lowest paid Title I teacher is \$24,000.

- **Step 1:** To determine salary differential as a set-aside for the breakdown of allocation, add up the salaries of all the Title I teachers in the district and get the total.  
Teacher 1 \$24,000 + Teacher 2 \$25,500 + Teacher 3 \$26,800 + Teacher 4 \$28,000 + Teacher 5 \$29,500 + Teacher 6 \$33,000 = Total \$166,800
- **Step 2:** Take the lowest Title I teacher salary and use that salary amount for all Title I teachers in the district. Multiply to get the total for all the Title I teachers in the district. ( $\$24,000 * 6 = \$144,000$ )
- **Step 3:** Take the total from Step 1 and subtract the total in Step 2 to get the difference ( $\$166,800 - \$144,000 = \$22,800$ ). This would be the amount for the salary differential.

## Method to Qualify

- **75% Eligibility (75%)** Every school with at least 75 percent or higher poverty rate must be served by the Title I program regardless of the school's grade span. This provision ensures that LEAs, which tend to favor elementary schools, serve high-poverty secondary schools. In other words, if a school is above 75% poverty, then it must be served.
- **District-Wide Eligibility (DW)** is an option if you are serving the highest poverty percentages first and not intending to prioritize a grade-span. To qualify, the school must be above the district average poverty level. If a school is not above the district-wide average, but it is above 35%, then the school may be served. However, the schools above the district-wide average must be served first.
- **Grade-Span Eligibility (GS)** prioritizes particular grade-spans within a district (i.e. K-6 , 7-8, 9-12, etc.). It is an option if the poverty percentages are above the grade span average or above the district-wide average. With grade-span, schools are ranked within their grade-span groupings.

### *How to Calculate Grade Span Average Manually*

- 1) Add up the poverty data of the percentages of all of the grade span schools that you wish to prioritize (e.g. elementary) and divide the sum by the number of schools:  
ex. (School A) 90% + (School B) 80% + (School B) 70%= 140% Divided by 3=80%
- 2) Elementary schools that are above that average number then may qualify by grade span average.
- 3) Schools A and B would be eligible under Grade Span.

- **35% Eligibility (35%)** is a secondary option to grade-span and district-wide if the poverty percentage is above 35%. Schools must still be ranked by poverty when using 35%. See additional criteria above for DW and GS.
  - If all schools within an LEA are below 35%, and they are not meeting the minimum PPE of the LEA, then the LEA may determine what funds are sufficient.
  
- **Grandfathered Eligibility (GF)** is an option if the school does not qualify using any method (75%, 35%, GS, DW) and the school was served the year before. *Note: GF is a 1-year option to use for Method to Qualify, and a school that is grandfathered must not be served at the expense of skipping another school that is eligible and of higher poverty.*
  
- **High Schools.** In a new provision under ESSA, a district may prioritize its high schools with a poverty rate of at least 50 percent, essentially treating them as though they have a 75 percent rate. That is, a high school with 50 percent poverty or more may be served before an elementary or middle school with a higher poverty rate of more than 50% and less than 75%.
  - For example, if an LEA wants to serve a high school with 53% poverty before an elementary school of 72% poverty, it now may do so.

## Skipping

An LEA may “skip” a higher-ranked eligible schools if it meets the Title I “comparability” requirements and is receiving supplemental funds from state or local sources that are at least equal to the amount the school would have received under Title I. To qualify, state or local funds must be spent in ways that would constitute an allowable program in either a Title I schoolwide or a target assistance program. This kind of allowable locally or state funded program is sometimes called a “Title 1-like” program.

*Overlapping Gradespans* When there are overlapping grades spans between schools in an LEA, then the LEA may determine what grades to serve. The schools must be placed in the grade span grouping that is most appropriate (e.g. LEA may place a K-8 schools in the same grade span groupings as the K-6 schools instead of the other 7-8 schools)

## Title I CEP Options (Community Eligibility Provision)

The Community Eligibility Provision eliminates the need for household applications for free and reduced-price meals in high-poverty LEAs and schools. Also, this option may be advantageous for some LEAs with high poverty who utilize CEP. CEP uses a 1.6 multiplier to boost the poverty percentage at a particular school, in order to produce higher poverty percentages.

To be eligible, LEAs and/or schools must meet a minimum level of “identified students” for free meals in the year prior to implementing Community Eligibility; agree to serve free breakfasts and lunches to all students; and agree to cover with non-Federal funds any costs of providing free meals to students above the amounts provided by Federal assistance. Reimbursement for each LEA or school is based on claiming percentages derived from the percentage of identified students, i.e., students certified for free meals through means other than individual household applications. The claiming percentages established in the first year for an LEA or school may be used for four school years and may be increased if the percentage of identified students rises for the LEA or school.

**Option A** Hybrid

**Option B** Direct Certification numbers

**Option C** Uses the 1.6 multiplier to produce higher poverty percentages

Visit the [IDOE CEP](#) website for more information.

## **Transportation**

Title I funds may be used for some transportation costs, provided that the Title I funds that are being used are not replacing transportation that should already be required to be funded through the school’s own budget and funds. For example, Title I funds may be used to fund transportation to a Title I summer School, Title I before or after school activity, or some other supplemental Title I program. However, it would not be permissible to use Title I funds to provide transportation for buses during the regular school day, except when supporting transportation for homeless and/or foster youth or a Title I preschool.

## **Supplies**

Title I funds may be used to purchase supplies that will serve student and parents directly. However, there are certain conditions that generally need to be met before supplies may be considered as an allowable expense. For example, instructional supplies are usually an allowable expense, if they are of a reasonable cost.

Many supplies for a parent night are also a generally allowable expense, as long as the purpose of those materials can be reasonably justified as necessary for supplementing the child’s education. Please note that meals, such as a spaghetti dinner or pizza night, are not an allowable expense. However, light snacks or refreshments for a Title I parent night may be an allowable expense.

## **Title I, Part A Reimbursement**

Reimbursement forms can be found in the Title I Application center. You must have a username and password to log into the system.

To complete a reimbursement form, you must follow the following steps:

1. After logging into the Title I Application center, click on Corp Reports (left side of the screen).
2. Click on Reimbursement Form.
3. Enter the contact information of the person completing the form.
4. Select the project year for the funds you are requesting (the project year is the same as the fiscal year).
5. Select the month.
6. Select the 1st or 15th of the month for the submission date.
7. Select the submission year of the reimbursement request (note: this is the period in which funds are requested, which may not be the same year from which funds are requested. For instance, an LEA could request 2015 funds in September during the July 2015-2016 period.)
8. Select the appropriate grant for reimbursement. The approved amounts from your budget will automatically be displayed in this form. Please note that the reimbursement forms must be submitted for each program from which funds are requested.
9. Complete the form to include the amounts requested for reimbursement.
10. Click the Update Totals button.
11. Click the Submit Form button. If the form does not go back to the initial welcome page, there is an error on the form that needs corrected.

You must have an approved application or amendment to be eligible for reimbursement. Forms must be submitted on or before the 1st and the 15th of each month or funding will be delayed until the next distribution.

## **Carryover**

There are two types of carryover funds.

1. *Unrequested funds* are funds that were available to the district, but were not requested in either the Title I Application or any Amendments.
2. *Unsent funds* are funds that were budgeted and approved, but not requested through reimbursement.

For the purposes of carryover into the next fiscal year, both types are treated in the same manner.

## Carryover Funds and Waivers

Under section 421 (b) of the General Education Provisions Act (GEPA), LEAs and SEAs must obligate funds during the 27 months extending from July 1 of the fiscal year for which the funds were appropriated through September 30 of the second succeeding fiscal year. This maximum period includes a 15-month period of initial availability plus a 12-month period for carryover.

The following example illustrates how the 27-month availability for Title I, Part A funds and the carryover limitation would operate for a district.

### Carryover Illustration

FY18 Allocation:	\$1,500,000
Minimum amount LEA must obligate between July 1, 2017 – September 30, 2018	\$1,275,000 (85% of allocation)
Amount LEA may carryover and obligate during October 1, 2018 – September 30, 2019	\$ 225,000 (15% maximum carryover)*
* Any funds that remain unobligated after the grant period revert to the IDOE. The carryover figure represents 15% of the current year's fiscal allocation, and not the total available funds that include carryover from a prior year.	

### Exceptions to Carryover Limitations

1. Districts receiving less than \$50,000.00 per year are excluded from the 15 percent maximum carryover limitation; these LEAs may carry over the entire allocation without penalty;
2. For districts receiving \$50,000.00 or more in a fiscal year, an excess carryover waiver may be granted no more than once every three years;
3. The required 1% parental involvement set-aside for districts receiving allocations of \$500,000 or more must be expended within the fiscal year. Any dollars not expended within the fiscal year must be carried over and added into the LEA's parental involvement budget for the next fiscal year.

## **Spending Carryover Funds**

Subject to the limitations described in the above section on Exceptions, LEAs have options when determining how to spend carryover funds. They may:

1. Allocate the funds to eligible schools (schools must be kept in rank order based on poverty); or
2. Allocate the funds for district level activities such as professional development.
3. In general, to ensure that equitable services are provided in a timely manner, an LEA must obligate the funds allocated for equitable services under all applicable programs in the year for which they are appropriated (ESEA sections 1117(a)(4)(B) and 8501(a)(4)(B).)

The unexpended funds must remain available for the provision of equitable services under the respective program during the subsequent school year. In determining how such carryover funds will be used, the LEA must consult with appropriate non-public school officials. (ESEA sections 1117(b) and 8501(c).) LEAs will be required to carryover those dollars into the next school year and budget them for the participating non-public school. This includes non-public school equitable share amounts received from LEA transfers.

## **Excess Carryover Waivers**

If IDOE determines that an LEA exceeds the 15% carryover limitation after the final expenditure report has been submitted and reviewed, the LEA will be notified.

To apply for a waiver, a letter of request and justification must be sent to the Title I office. An LEA may only request a waiver once every three years. Carryover waiver forms are to be provided by the Office of Title Grants and Support along with the notification of excess carryover.

The request must specify the following:

1. Reasons why 15 percent was exceeded;
2. Specific actions LEA will take to bring excess below the 15 percent allowed;
3. Specific activities to be carried out and maximum amount of funds to be expended for each activity.

## **Maintenance of Effort (MOE)**

Maintenance of Effort is required by many grant programs, including Title I, II, and III. The purpose of the maintenance of effort requirement is to ensure the recipient of federal funds (LEA) does not spend those funds in place of state and local dollars. Maintenance of effort ensures grant recipients spend their state and local funds for the same activities that would be provided if federal dollars were not available. This result is a program where federal dollars supplement (add) the normal activities of the district

and do not supplant (replace) the LEA's normal activities. The underlying principle is that the district is responsible for maintaining effort in providing a free public education to all students from year to year. Title I is in addition to the required education that all students receive.

## **Calculating Maintenance of Effort**

The State Education Agency is responsible for calculating maintenance of effort as follows:

The combined fiscal effort per student OR the aggregate expenditures of the district from state and local funds for free public education for the preceding fiscal year cannot be less than 90 percent of the combined fiscal effort OR aggregate expenditures for the second preceding fiscal year.

The measure most favorable to the district is used to calculate the maintenance of effort requirement.

If an LEA fails to meet the MOE requirement, the State Education Agency must reduce the LEA's Title I allocation in the exact proportion by which the LEA has failed to meet MOE. (Example: If an LEA's maintenance of effort is found to be only 80%, the Title I allocation is reduced by 10% because the MOE requirement is not less than 90%).

## **Exceptions**

The U.S. Secretary of Education may waive the maintenance of effort requirement if it is determined that such a waiver would be warranted due to:

- (1) Exceptional or uncontrollable circumstances, such as a natural disaster;
- (2) A precipitous decline in the financial resources of the district.

## **Preschool Guidance**

Title I preschool programs are intended to assist children most at risk of failing to meet the State's challenging academic standards based on multiple, educationally related, objective criteria. Certain children are also "automatically eligible" to participate in a Title I preschool program if offered by the LEA (e.g., an LEA or school need not identify the child as most at risk of failing to meet the State's academic achievement standards), including:

- Children who participated in Head Start, received services supported by the Comprehensive Literacy State Development Grants program within Literacy Education for All, Results for the Nation (LEARN) (formerly known as Striving Readers Comprehensive Literacy Program), or attended a Title I preschool program at any time in the prior two years;

- Children who received services under Title I, Part C (migrant education) in the prior two years; preschool-age children experiencing homelessness; and
- Children who are in a local institution or attending a community day program for neglected or delinquent children and youth (ESEA section 1115(c)(2)).

A Title I LEA or school may use its Title I funds to support a district-operated preschool program or a school-operated preschool program, or for coordination with other preschool programs (e.g. Head Start), based on the needs of its eligible students and the most effective use of those funds. The use of Title I funds for a preschool program is a local decision. As a Title I recipient, an LEA or school that uses Title I funds to operate a preschool program must comply with the same requirements that apply to all Title I programs. For example, a Title I preschool program may only include children who are most at risk of failing to meet a State's challenging academic standards when they enter elementary school unless the preschool program is part of a schoolwide program, in which case all children may attend if funding is available. However, Title I must prioritize K-12 children who are at risk of not meeting state academic standards as a primary purpose of the funding, with preschool an allowable and encouraged secondary purpose.

In addition, if an LEA chooses to provide preschool services using Title I funds, the district must "support, coordinate, and integrate services provided under (Title I) with early childhood education programs." The program must also meet, at a minimum, the education performance standards of the Head Start Program Performance Standards that are aligned with the Head Start Child Early Learning Outcomes Framework Ages Birth to Five (2015), which the secretary of education must disseminate to LEAs.

For more information regarding the Federal ESSA Guidance on Pre-school, click on the following link for [Non-Regulatory Guidance Early Learning in the Every Student Succeeds Act: Expanding Opportunities to Support our Youngest Learners.](#)

## **Teacher Recruitment and Retention Incentives**

Up to 5% of an LEA's Title I allocation may be used for teacher recruitment and retention incentives, such as a sign-on bonus in a shortage area or a stipend to retain all highly effective teachers in the Title I building. This is limited to use in identified Title I Comprehensive Support & Improvement (CSI) and/or Targeted Support & Improvement (TSI) schools.

## **Transferability of Funds**

Transferability is a flexibility authority under ESSA that permits SEAs and LEAs to transfer a portion of the funding they receive by formula under selected Federal programs to their allocations under other programs in order to most effectively address

their needs. LEAs are permitted to transfer up to 100% of the funds it receives under Title II, A to Title I, A, as long as the LEA address equitable services for non-public schools before *and* after the transfer.

If requesting a transfer, the LEA must complete a transfer request form in the Title II application. The form is submitted with the Title II application, for approval by IDOE. The approved Transferability form will be forwarded to the assigned Grants Management Specialist and the transferred funds will be added to the Title I, Part A BASIC grant to show the addition of the transfer funds to the Title I, A program.

Any Title II, Part A funds which are being transferred to Title I must be requested for reimbursement using the Title II, Part A reimbursement form, after the funds have been spent. Once received, the funds can then be transferred from Title II, Part A to Title I at the school corporation level for the current Title I grant application year.

Districts are permitted to transfer funds from Title II, Part A to Title I, Part A, but never out of Title I, Part A.

## **Impact of Transferring Funds Into Title I**

If a district transfers Title II, Part A into Title I, Part A, the Title I application includes the additional funds when calculating the set asides and non-public equitable share (an equitable share for non-public schools will also be generated for Title II, Part A before the transfer to Title I, Part A).

Funds transferred into Title I, Part A will affect the distribution of funds under the formula. The statute requires that transferred funds be spent in accordance with all rules and requirements of the program to which funds were transferred.

For example, LEAs that must reserve 1% of their new allocation for parental involvement must include both the new allocation and transfer funds into the total amount of funding from which to determine the 1%.

## **STN App Center**

The STN App Center acquires the data of local student management systems, like Skyward and Powerschool, and uploads all of the demographic data about the students. On this system, LEAs may lookup enrollment history. Also, English Learners will have testing data from WIDA ACCESS testing. This system also allows users to see if the child is being provided with Title I services. Users may visit this resource at this link: <https://appcenter.doe.in.gov/login.aspx?ReturnUrl=%2f>

## Foster Parent Memo

For more information regarding Foster Youth Resources, visit the [Indiana Department of Education: Foster Youth](#) website. To download a printable version of the Foster Parent Memo, visit this direct link to the [IDOE Foster Parent Memo](#).

## Title I, A: Non-public Equitable Services

LEAs must consult with non-public schools in their geographic area to ensure that Title I: Part A, Title I: Part C, Title II: Part A, Title III, Title IV, and 21st Century services are provided to non-public students in a manner that is allowable and comparable to those provided to public school students and teachers participating in these programs. These services can be different from those provided to public school participants and are determined in collaboration with non-public school administrators. All non-public funding and programs are administered by the LEA. **No funds are provided directly to non-public schools.** The one exception is 21<sup>st</sup> Century, which may be allocated directly to non-public school subgrantees. All grants with non-public equitable shares must attach evidence of consultation with non-public schools to their grant application. Please note that charter schools and public school districts with no non-public schools within their geographical boundaries are an exception to this requirement.

For more specific information regarding Non-public Equitable services unique to each grant, including consultation, timelines, and calculation of equitable share allocations, please visit the [Non-public Guidance Appendix](#).

### Suggested Consultation Timeline



## What is Non-Public Consultation?

Consultation involves discussions between public and private school officials on key issues that affect the ability of eligible private school students to participate equitably in

Title I programs. Effective consultation provides a genuine opportunity for all parties to express their views and to have those views considered. Successful consultation establishes positive and productive working relationships that make planning easier and ensure that the Title I services provided meet the needs of eligible students. To access the LEA Affirmation of Consultation, please visit the [IDOE Ombudsman](#) website.

## **Funding for Non-public Equitable Services**

Under ESSA, a proportion of funds based on total allocation that is equal to the proportion of low income children residing in Title I attendance areas.

## **How Non-public Equitable Share is Generated for Title I**

Funds for Title I services are generated if non-public school children are identified for free and reduced lunch or some similar method of socioeconomic status. Non-public school students are entitled to Title I services if they live in an eligible Title I school attendance area, and are failing or at risk of failing based on educational need. Students are automatically eligible if they are identified as homeless, migrant, Head Start, or Even Start participants.

After consultation with private school officials, if the private school opts to receive Title I services, the LEA determines which option it will use to fund the Title I programs for eligible private school children.

Option 1: **School-by-School Basis** - Use funds allocated for eligible private school children to provide Title I services on a school-by-school basis to eligible private school children residing in participating public school attendance areas.

Option 2: **Pooling** - Combine (pool) funds allocated for all eligible private school children to be used to provide Title I services to eligible children who reside in participating public school attendance areas and attend any private school.

Title I funds are always under the direct management of the public school district. Therefore, any instructional staff, materials and supplies, professional development, etc. used in the non-public school must be approved and paid for by the public school district. Private school officials have no authority to obligate Title I funds.

Equitable services to non-public school children are required in the following areas:

1. Parental Involvement
2. Teacher and Paraprofessional Qualifications
3. District-wide Instructional Programs Additional non-public school guidance can be found on the [IDOE Non-public Ombudsman](#) website.

ESSA requires that the Title I, Part A proportionate share of equitable services be calculated prior to allocating for any expenditures or transfer of funds. This includes any

“off the top” funds, such as administrative cost, parent involvement, and district-wide initiatives. Services must be allowable and comparable to those provided to public school students and teachers participating in the program, but are not required to be the exact same Title I service.

No funds are to be provided directly to non-public schools. Funds, materials, and equipment generated by the non-public school’s per pupil allocation must be managed and retained by the LEA.

The PPE is determined by dividing the Equitable Share by the number of low-income non-public school students.

**Equitable Share Example:**

NON-PUBLIC School Equitable Share to be used for Instruction and Professional Development divided by Total number of low-income NON-PUBLIC school students who live in Title I-served attendance areas (E ÷ C):

$$\text{\$ } 468,383.56 \div 265 = \text{\$ } 1,767.49 \text{ PPE for Instruction and Professional Development}$$

NON-PUBLIC School Equitable Share to be used for Parental Involvement divided by Total number of low-income NON-PUBLIC school students who live in Title I-served attendance areas (D ÷ C):

$$\text{\$ } 4,731.15 \div 265 = \text{\$ } 17.85 \text{ PPE for Parental Involvement}$$

New Allocation	1% of Parent Involvement	Transfer Amount (from Title II, Part A)	Total New Allocation and Transfer Amount	1% Parent Involvement
\\$500,000.00	\\$5,000.00	\\$10,000.00	\\$510,000.00	\\$5,100.00

**TOTAL NON-PUBLIC School PPE  $\text{\$ } 1,767.49 + \text{\$ } 17.85 = \text{\$ } 1,785.34$**

**Non-public Complaint Procedures**

The Ombudsman works in partnership with the Office of Title Grants and Support, so if issues still exist because an agreement cannot be met between the non-public school official and the public school official during technical assistance with the Federal Grants Specialist, a formal complaint can be filed with the Ombudsman to mediate a positive resolution. The complaint procedure can be found by accessing the [Non-public School Complaint Process](#). Also, more resources about Non-public schools may be found at

the [IDOE Title Grants and Supports](#) website. The template for the Letter of Complaint to the Ombudsman is posted on the [IDOE Ombudsman](#) website.