

Department of Grant Compliance and Administration

Statewide Training Series

Questions & Answers

Training Title: Title I, Part A Within-LEA Allocations and 2023-2024 SC5000 Title I, Part A Campus Selection Schedule

Training Date: 6/8/2023

For additional information, please contact us at ESSASupport@tea.texas.gov.

Question 1: We have a campus that is closing due to low enrollment. We have two other schools that are consolidating due to low enrollment. It looks like I would put a zero for enrollment in the closed schools and only report enrollment for the 1 school for which kids were combined. Correct? Do I choose None for eligibility? Also, would copying prior-year data be ok to do if we then correct the campus information for those schools that will be closed?

Answer 1: If you are going to use the “Copy Prior-Year Data” option, you should do that when you first start to complete the SC5000 schedule, because doing so will delete any information that you have already entered on that schedule. For a campus that has closed, you should enter 0 enrollment and indicate that the campus is not served. You would enter the number of students for the campus on which the enrollment has been combined and select the appropriate basis for eligibility.

Question 2: Our district has a campus that was previously 4-5th grades and next year it will house 3rd-5th grade. Our primary campus will no longer house 3rd grade and will be a PK-2 grade campus. So the 3rd graders will now be included in the new campus counts. If the SC5000 does not populate with the correct grade level, do we make the counts match what the SC5000 reports which will be the old campus alignment?

Answer 2: The LEA should ensure that the correct campus configurations are entered in AskTED. The SC5000 pulls the campus information (campus name, campus number, and grade span) directly from AskTED. Once the correct campus information has been populated in the SC5000, the LEA should enter the campus counts. If both campuses are Title I, Part A eligible and will be Title I, Part A served, the counts entered for each campus would include 3rd-5th grade students for the elementary campus and PK-2nd for the primary campus.

Question 3: Can you address inter-district and intra-district transfer impact to using “residing” as the method of calculating Campus Low-Income percentages?

Answer 3: If the LEA has inter-district and intra-district transfers that affect the number of students at its campuses, the LEA would likely want to select “Enrollment” as the basis for eligibility. That would allow the LEA to calculate the low-income percentage for the campus based on the number of low-income students enrolled divided by the total number of students enrolled at the campus.

Question 4: Please describe the difference between Residing and Enrollment when determining Basis of Eligibility.

Answer 4: An LEA selects “enrollment” for the basis of eligibility when it is using the total number of students enrolled on a campus, based on the as-of date selected by the LEA. An LEA selects “residing” for the basis of eligibility when it is using the number of students residing in the attendance area.

Question 5: The feeder pattern slide said the secondary schools must approve before that it is used. Who must be involved in the approval process AND how do you document such approval was acquired?

Answer 5: ESSA Section 1113(a)(5)(C) states that before an LEA may use feeder patterns to determine the poverty percentage of secondary schools, the LEA must conduct outreach to its secondary schools to inform them of the option, and a majority of its secondary schools must approve the use of feeder patterns. At minimum, an LEA should secure approval from the campus principals of secondary schools. Best practice would be to involve the campus decision-making committees of the secondary schools in the approval process.

In the case of an audit and/or random validation monitoring, an LEA would need to maintain locally written documentation that it conducted outreach to its secondary schools to inform them of the use of the feeder pattern option, and that a majority of its secondary schools approved the use of feeder patterns to determine the low-income percentages for the secondary schools.

Question 6: Just for clarification, is it true that we do not necessarily have to use snapshot data, as long as we use the same dates to determine both the poverty data and the enrollment data? Example: May 22 is the as-of date we pulled Economically Disadvantaged student data. We would use May 22 to pull total enrollment data as well?

Answer 6: That is correct. All the data must come from the same as-of date, whatever date the LEA chooses. Also, the LEA must use the same data to determine campus eligibility as it uses to determine campus allocations. In the case of an audit and/or random validation monitoring, the LEA should maintain documentation locally that confirms the data entered into the SC5000.

Question 7: Can we make a local decision to skip high schools even if they meet low-income percentage eligibility requirements?

Answer 7: The LEA can decide to group campuses with 75% poverty and below by grade span. The LEA can then decide which grade span groups to serve, so yes, the LEA could choose not to serve the high school grade span group. However, if the LEA has any campuses above 75% poverty, the LEA must serve those campuses (regardless of grade span) before serving any campus at 75% or below.

Question 8: Can districts still use the total students coded in PEIMS as 01, 02, and 99 (other eco. dis.) when determining their eco. dis. %?

Answer 8: Yes, the LEA can include students coded in PEIMS for economically disadvantaged as 01, 02, and 99 to determine its LEA and campus low-income percentages reported on the SC5000. If the LEA is using code 99, it would want to reference in its LEA Title I, Part A Program Plan/District Improvement Plan that it is using a composite of the allowable measures of poverty since it is using other data in addition to Free and Reduced-Priced Lunch (FRPL) data.

Question 9: If an alternative school has a low-income percent of 73.21% but is not served, will the campus status be skip or NS?

Answer 9: It depends. If the LEA is ranking all its campuses from highest to lowest based on poverty percentage, the LEA can choose to serve only those campuses that are above the alternative school (which is at 73.21%). In that case, the LEA would mark the alternative school (and all the campuses below it) as "Not Served." If the LEA is grouping campuses with 75% poverty or below, the LEA could choose to serve other grade span groups and mark the alternative campus as "Not Served." However, if the LEA ranks all its campuses in order of poverty and chooses to serve a campus with a lower poverty percentage than the alternative school, the LEA would have to mark the alternative school as "Skipped." Likewise, if the LEA groups its campuses by grade span and chooses to serve a lower poverty campus within the same grade span as the alternative school, the alternative school would have to be marked "Skipped."

Question 10: You mentioned a Community Eligibility one-page reference document that is on the TEA Title I Part A webpage. Can you share the link? I am not seeing the document posted. Please help me find it.?

Answer 10: The information specific to determining campus allocations for LEAs implementing the Community Eligibility Provision(CEP) can be found in "Appendix A: Questions and Answers About Within-District Title I Allocations and the Community Eligibility Provision" of the [USDE Non-Regulatory Guidance Document: Within-District Allocations](#) (Pages A1-A11), which is located under the USDE Resources section of the [TEA Title I, Part A webpage](#).

Question 11: For schools with a low-income percent of greater than 75%, can you provide different per-pupil amounts for the different grade spans? Within each grade span we would make sure that campuses with higher poverty percentages receive a greater per-pupil amount than campuses with lower poverty percentages.

Answer 11: For campuses above 75%, the LEA can give different per-pupil amounts, as long as the LEA is not giving a higher per-pupil amount to a lower poverty campus. The LEA can also select different per-pupil amounts for different grade spans, as long as within each grade span the LEA is not giving a higher per-pupil amount to a lower poverty campus. Also, campuses that are grouped by grade span cannot receive a higher per-pupil amount than a campus that is above 75% poverty.

Question 12: When using Grade-Span Grouping, can an LEA choose how many of the eligible campuses within a given grade-span to serve, right?

Answer 12: The LEA can decide where to stop on the list of campuses to be served. The only restriction is that the LEA must serve campuses in rank order of poverty (either districtwide or by grade span). The LEA cannot choose to serve a lower poverty campus in a grade span while not serving a higher poverty campus in the same grade span.

Question 13: On the Basis of Eligibility, can an LEA choose one eligibility method for one campus and a different eligibility method for another campus or does the same eligibility have to be applied to all campuses which make some campus ineligible?

Answer 13: The LEA can have different eligibility methods selected for different campuses. However, if an LEA is using “enrollment” as a basis of eligibility, it should not have any campuses noted as “residing” for basis of eligibility; and if the LEA is using “residing,” it should not have any campuses noted as “enrollment.”

Question 14: We have a new campus that will be opening in 2023-24. We have been preparing this school year and have all the required documents (PFE Policy, Compact, CIP, etc.) This campus will be eligible based on its feeder pattern, and we want to serve it. Can a feeder pattern be used for a brand new school?

Answer 14: Yes, a feeder pattern can be used to establish eligibility for a new campus.

Question 15: Would campuses using one-year transition as the basis of eligibility be served as Targeted Assistance, or can they be Schoolwide if that is what they were the previous year? We have campuses that were served as SW because of the previous year option. They have now fallen below 35%, so will they be in the one-year transition?

Answer 15: If a campus that is using one-year transition as its basis of Title I eligibility was previously a schoolwide campus based on its having met the 40% poverty threshold in a prior year, the campus could continue as a schoolwide campus for the one-year transition period. It

would mark “Schoolwide Previous Year” under the Schoolwide Eligibility column. Or, if the campus was using an Ed-Flex Schoolwide Eligibility Waiver in the previous year, the LEA would mark the SW Waiver option under Schoolwide Eligibility. The campus can also choose to operate a targeted assistance program instead of a schoolwide program using the one-year transition as its basis of Title I eligibility.

Question 16: If an LEA chooses Enrollment for the Basis of Eligibility and serves all the campuses at 75% or above, can the LEA then choose to serve the other campuses based on enrollment and regardless of percentage as long as it has served the campuses that are required to be served?

Answer 16: After serving all campuses above 75% poverty, the LEA may choose to serve campuses down to 35% or down to the LEA average poverty percentage, whichever is lower. An LEA is required to serve campuses in rank order of poverty. The total campus enrollment cannot be used in determining which campuses to serve that have a low-income percentage below 75%. The LEA is required to use the low-income percentages in determining which campuses to serve.

Question 17: Can the LEA decide to allocate funds only to schoolwide eligible campuses (those over 40%)?

Answer 17: The LEA can decide where to stop on the list of campuses to be served. The LEA has the option to serve as low as 35% or the LEA average poverty (whichever is lower), but the LEA may choose to stop at a higher percentage.

Question 18: Can a campus that is below 40% use the LEA percentage (ex: below 35%) to determine eligibility?

Answer 18: The LEA may determine overall Title I, Part A eligibility by using the LEA poverty percentage or 35%, whichever is lower. However, the poverty threshold for Schoolwide eligibility is 40%. If the LEA wants to serve a Title I-eligible campus with a poverty percentage lower than 40%, the LEA will need to select either the “Schoolwide Previous Year” option or the “Ed-Flex Schoolwide Eligibility Waiver” option under the Schoolwide Eligibility column.

Question 19: Does using the “Schoolwide Previous Year” option to establish Schoolwide program eligibility also establish overall Title I, Part A eligibility?

Answer 19: No. If a campus is not Title I, Part A eligible, it cannot use the “Schoolwide Previous Year” option to establish overall Title I, Part A eligibility. The “Schoolwide Previous Year” option can only be used to establish Schoolwide Program eligibility on a campus that meets the overall Title I, Part A eligibility requirements.

Question 20: Our alternative high school campus has an enrollment less than 100, and a low-income percentage that is less than 75% but over 50%. It is not served with Title I, Part A funds. Is it SKIPPED or NOT SERVED?

Answer 20: It depends. If the LEA is ranking and serving on a districtwide basis (i.e., not grouping by grade span), and the LEA chooses to stop serving campuses before getting to the alternative high school, the alternative high school would be “Not Served.” But if the LEA chooses to serve a lower poverty campus on the list (and not the alternative high school), and alternative high school would be “Skipped.”

Question 21: Do I understand correctly that “SW Previous Year” eligibility is allowed to be used for multiple future years, not just for the “previous” year in which they were SW?

Answer 21: Correct. A campus that has established schoolwide eligibility may continue to operate as a schoolwide program, as long as the campus maintains its Title I eligibility.

Question 22: If we already applied for the Ed Flex Schoolwide Program eligibility waiver in the prior year due to being Title I-eligible but not at 40%, do we choose the SW previous year since we would already have applied for the Ed Flex waiver in a prior year?

Answer 22: No. The Schoolwide Eligibility waiver would be marked each year that the campus is using the waiver. The only way the campus would not need the waiver is to establish the 40% poverty threshold on its own.

Question 23: We have a campus that has become eligible for Title I with a low-income percentage of 42%, based on 2022-23 enrollment data. The campus has not been eligible in previous years. We will use the 2023-24 school year to prepare and will plan to serve that school during the 2024-25 school year. If their % drops, and they are no longer eligible based on 2023-24 low-income numbers, can we serve them in 2024-25 under SW Previous Year?

Answer 23: Not necessarily. In order to use the “Schoolwide Previous Year” option, a campus must have been Title I-eligible and served as a schoolwide program. At best, if the campus were served as Targeted Assistance or Schoolwide during the 2023-2024 school year and then fell out of eligibility for the 2024-25 school year, the LEA could choose to invoke the “One-Year Transition” for the campus’s eligibility for 2024-25. If the campus low-income percent drops below the 40% threshold in 2024-25, remains Title I, Part A eligible, and the campus completed its Schoolwide Program planning in 2023-24, the LEA could apply for an Ed Flex Schoolwide Program eligibility waiver to operate a Schoolwide Program on the campus. Additionally, the LEA could choose to serve the campus as a Targeted Assistance program campus in 2023-24 as it completes the planning for operating a Schoolwide Program in 2024-25.

Question 24: Is the purpose of using the "Grade Span Grouping" method to be able to identify ALL campuses in the grade span group as either ALL Title I Eligible or ALL as NS??

Answer 24: The purpose of Grade Span Grouping is to focus the LEA's Title I, Part A resources in a particular grade span, without having to serve other campuses that might have a higher poverty percentage when ranked by poverty for the entire district. The LEA does not necessarily have to serve all the eligible campuses within a grade span group; it just has to serve in rank order within the group. Please note that campuses above 75% must be served/allocated funds before using the grade span grouping option to serve campuses with a low-income percent of 75% and below.

Question 25: When there is more than one feeder elementary, do you average the percentages?

Answer 25: Not exactly. If there is more than one feeder elementary, the LEA would add all the low-income students at all the feeder elementary schools and divide them by the total enrollment for all the feeder elementary schools. That would give the poverty percentage for the feeder pattern, which would be applied to the middle school.

Question 26: LEA Reservation for Parent and Family Engagement (PFE) - The slide states "retain no more than 10% for LEA PFE activities." Does this mean that no more than 10% of the 1% that is reserved? Or does that mean 10% of the LEA's total Title I allocation?

Answer 26: That would be no more than 10% of the 1% that is reserved for PFE activities. Ninety percent of the 1% must be allocated to Title I campuses.

Question 27: So, there is no way an LEA can assign a higher allocation to campus Q than to campus A correct (Slide 131 Example)?

Answer 27: There is no way that the LEA can assign a higher per-pupil amount to campus Q than to campus A. The campus allocation for campus Q might be greater than the campus allocation for campus A (because the per-pupil amount would be multiplied by the number of low-income students), but the per-pupil amounts are what is compared.

Question 28: So for example, if an LEA keeps the original ratio for per-pupil amounts, it can spend more than its per-pupil amount (i.e., A higher low-income % campus has a per-pupil amount of \$100 and a lower low-income % campus has a per pupil amount of \$50)? The LEA could spend over those amounts as long as it doesn't spend more on the lower % campus. Like \$200 at campus A and \$100 at campus B?

Answer 28: Remember that we are looking at allocations, not expenditures. You are correct that we are comparing per-pupil amounts, not campus allocations. The per-pupil amounts are multiplied by each campus's number of low-income students to calculate the campus allocation.

Question 29: Does the per-pupil amount (PPA) for campuses above 75% need to be the same regardless of grade span? Or can the PPA for the above 75% campuses be assigned within each grade span - so ES, MS, and HS campuses above 75% might each have a different PPA but it is the highest PPA within the grade span.?

Answer 29: The campuses above 75% should be considered as a separate group. They must be served in rank order of poverty before the LEA proceeds to group campuses with 75% poverty and below by grade span. The campuses above 75% may have different per-pupil amounts, but a higher per-pupil amount cannot be given to a campus with a lower poverty percentage. The grade span groupings only include campuses that have 75% poverty or less.

Question 30: If a grade span is getting \$1,000 per pupil for being 76% poverty, can a campus at a different grade span get more per pupil at 72% poverty?

Answer 30: The LEA must consider campuses above 75% as a separate group, not as part of a grade span. The grade span groupings cannot receive a higher per-pupil amount than the campus group that is above 75% poverty. Once the LEA is considering campuses 75% and below by grade span, the LEA is looking at the percentages only within that grade span, not across grade spans.

Question 31: Slide 134 for Campus Allocations within Grade Spans - You stated the campuses above 75% their own group with \$1,500 per pupil. My question is specific to this greater than 75% group. Can we further sub-divide the greater than 75% grouping into different grade-span per pupil amounts, too? For example, all Elementary Schools above 75% get \$1,500 per pupil and all Middle Schools above 75% get \$1,200 per pupil. Or must all >75% schools get the same exact amount per pupil (i.e. Elementary and Middle Schools get \$1,500)?

Answer 31: The group containing campuses greater than 75% poverty must be served in rank order of poverty (not by grade spans), but it can have different per-pupil amounts, as long as a higher poverty campus doesn't get a lower per-pupil amount than a lower poverty campus. This is true within the grade span groupings as well.

Question 32: How do we determine the per-pupil amount?

Answer 32: If the LEA is not required to apply the 125% rule, the LEA may select any per-pupil amount it chooses, as long as a lower poverty campus does not get a higher per-pupil amount than a higher poverty campus.

However, if the LEA is required to apply the 125% rule, then statute sets the calculation for the per-pupil amount:

Step 1: total low-income students in the LEA (public and private school) divided by total enrollment of the LEA (public and private school) = LEA per-pupil amount.

Step 2: LEA per-pupil amount multiplied by 1.25 = per-pupil amount to be applied to all Title I, Part A-served campuses.

Question 33: Our PK students are on a single campus, and the low-income percentage is greater than 75%. Does the campus fall under required funding, or does it fall under the optional early childhood reservation?

Answer 33: If campuses are served with a low-income % below the low-income % of the PK campus, then it would be required to be served. Otherwise, it could be skipped if it meets the skipped campus criteria. Funds reserved at the LEA level for Preschool Activities would be to operate a districtwide PK program across multiple campuses.

Question 34: Would you talk a little more about the Related Exception?

Answer 34: The related exception applies if the amount of supplemental State or local funds a campus receives is less than what it would receive under Title I, Part A. ESSA permits an LEA to reduce the amount of Title I, Part A funds allocated to a Title I campus by the amount of supplemental funds from State or local sources that it spends on programs that meet the intent and purpose of Title I, Part A.

Question 35: Is there a way to serve specialty campuses, such as a DAEP with Title 1? These would be campuses in which the students are coded back to a home campus and whose enrollment is marked as "none" on the SC5000. If all campuses are Title I served, is there a way to use Title I to address the needs of specialty campuses as well since the students' home campuses are Title I-served?

Answer 35: In order for a DAEP campus to be a Title I, Part A campus, the LEA would have to list an enrollment for the campus on the SC5000, and the campus would have to be eligible for Title I, Part A services based on its low-income percentage.

Alternatively, for those students attending the DAEP who have a home campus that is a Title I, Part A schoolwide campus, the home campus could provide those students with Title I, Part A services from the home school's Title I, Part A allocation.

If all the LEA's campuses are Schoolwide campuses, the LEA could reserve Title I, Part A funds at the district level to provide the DAEP students with Title I, Part A services.

Question 36: When using the grade span grouping option, can a campus with 72% poverty ever get more (per-pupil) than a campus with 76% poverty?

Answer 36: No. No campus with a poverty percentage of 75% or below can get a higher per-pupil amount than a campus with a poverty percentage above 75%.

Question 37: Can Title I, Part A funds be used for District leadership to attend professional development sessions?

Answer 37: The activity would have to be an identified need and included in the District Improvement Plan. In addition, the LEA would have to determine whether the other requirements in the [Title I, Part A Use of Funds Guidance](#) are met, including whether this activity meets the intent and purpose of the Title I, Part A program.