

## Spring 2023 Statewide Training Series

### Questions & Answers

Training Title: Title I, Part A Program Compliance Report & Self-Check

Training Date: 05/09/2023

*For additional information, please contact us at [ESSASupport@tea.texas.gov](mailto:ESSASupport@tea.texas.gov).*

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#### **PR1000 – Title I, Part A Compliance Report – Parts 1 and 2 Questions**

- Q1: When reporting expenditures in Parts 1 and 2 of the PR1000 – Title I, Part A Compliance Report, does an LEA include funds expended that were redirected into the Title I, Part A program via Funding Transferability and through the Rural Education Achievement Program (REAP) flexibility?**
- A1: For parts 1 and 2, report only those expenditures and activities paid with Title I, Part A funding during the compliance report grant year. Funds utilized from other programs through Funding Transferability should be included in the expenditure amounts for Title I, Part A. Do not include Rural Education Achievement Program (REAP) funds utilized for Title I, Part A activities. In the past, we have included in our instructions for the PR1000 that funds utilized from other programs through the Rural Education Achievement Program and Funding Transferability should be included in the expenditure amounts for Title I, Part A. However, for 2022-23 and beyond, per USDE guidance, we have been advised that only expenditures from funds redirected via Funding Transferability are to be reported in addition to Title I, Part A funds expended from the LEA's Title I, Part A entitlement.
- Q2: Do indirect costs need to be itemized in Part 1, Line 12 (Other) of the PR1000 – Title I, Part A Compliance Report?**
- A2: If indirect costs were included in the PS3101 – Title I, Part A program schedule of the ESSA Consolidated Application, they would be reported in the PR1000 in Part 1, Line 6 (Administration of Title I, Part A programs).
- Q3: If a homeless liaison is partially funded from Title I, Part A, would the portion of the salary be reported in Line 6 (Administration of Title I, Part A programs) or Line 8 (Services to Homeless Students) of Part 1 of the PR1000 – Title I, Part A Compliance Report?**
- A3: The LEA would report the portion of the salary expended based on where the funds were reserved in the PS3101 – Title I, Part A program schedule of the ESSA Consolidated Application. If the funds for the partial salary were reserved as “Administration of Title I, Part A programs” on the PS3101, the LEA would report the expenditures in Line 6 of the PR1000. If the funds for the partial salary were reserved as “Services to Homeless Students” on the PS3101, the LEA would report the expenditures in Line 8 of the PR1000. If the position is providing direct services to homeless students, the salary would generally be included on the PS3101 under “Services to Homeless Students.”

**Q4: Are administrative tasks performed by staff funded by the Title I, Part A program for parent and family engagement activities, coordinating the Title I, Part A LEA Program Plan/District Improvement Plan process, and/or coordinating the Title I, Part A Schoolwide Program Plan/Campus Improvement Plan considered “Administration of Title I, Part A programs” and should such expenditures be included on Part 1, Line 6 (Administration of Title I, Part A programs) of the PR1000 – Title I, Part A Compliance Report?**

A4: The LEA would report the salaries expended based on where the funds were reserved in the PS3101 – Title I, Part A program schedule of the ESSA Consolidated Application. If the funds for the salaries were reserved as “Administration of Title I, Part A programs” on the PS3101, the LEA would report the expenditures in Line 6 of the PR1000. The LEA would refer to the guidance related to Direct Program Costs and Administrative Costs in the [ESSA Consolidated Application Budget Schedule Instructions](#), and make a determination of where to reserve the funds on the PS3101 based on the guidance and LEA’s local policies and procedures.

**Q5: On the ESSA Consolidated Compliance Report there is a question dealing with the Title I, Part A expenditure amount. Can that be an estimated amount as of the end of the 2022-2023 grant year, or should it be the actual amount as of the date the completion of the compliance report? What is the best way for a school district to determine/support the dollar amount that is entered there?**

A5: The expenditure amounts reported should be as close to actual as possible, and the LEA should have budget/general ledger documentation to justify the amounts reported. If the LEA has obligated funds that are not actually expended at the time of the compliance report submission, the LEA is to include a best estimate of what the total expenditure will be for each line.

### **PR1000 – Title I, Part A Compliance Report – Part 3 Question**

**Q1: For Part 3 [Public Schools Student Participation for Ages 0 – 2 and Ages 3 – 5 (not reported in PEIMS)] of the PR1000 – Title I, Part A Compliance Report, what are some examples of students that would be reported in this part and would not have been reported in PEIMS?**

A1: One example includes providing services to students in preschool programs. There is a chart on page 10 of the [non-regulatory guidance issued by the US Department of Education](#) that describes several ways in which Title I, Part A funds may be used to support preschool programs. The LEA would need to be sure that the preschool students served are residing in the attendance area of a schoolwide campus, or if the students reside in the attendance area of a targeted assistance campus that they are identified according to the LEA’s criteria as at risk of failing to meet the State’s academic achievement standards when they reach school age. The students served in such preschool programs should be reported at the end of the year on the PR1000 as students (ages 0-2) or students (ages 3-5, not reported in PEIMS).

The LEA might also have children in those age groups who receive Title I, Part A services to homeless children.

## PR1000 – Title I, Part A Compliance Report – Part 5 Questions

### General Questions

**Q1: When reporting compliance for Part 5 (Program Compliance Self-Check) of the PR1000 – Title I, Part A Compliance Report is the LEA reporting compliance for the grant year that was recently completed or is it for the next year?**

A1: When completing the PR1000 – Title I, Part A Compliance Report, the LEA is self-reporting data from the grant year that was recently completed. For example, the 2022-2023 PR1000 that is due by September 30, 2023, would include data from the 2022-2023 grant year. The compliance report is an end-of-year report, and an LEA should report its compliance status for Part 5 based on the documentation that it has maintained locally and available to TEA and/or an auditor on request for the 2022-2023 grant year.

**Q2: Is it possible for an LEA to have campuses that operate Schoolwide programs and Targeted Assistance programs?**

A2: Yes.

**Q3: Will an LEA be asked to provide documentation for any of the self-check items in Part 5 that were reported as “In Compliance”?**

A3: At any time, TEA and/or an auditor may request documentation to show evidence of compliance for a report certified and submitted by the LEA. The LEA is required to maintain documentation locally and to be made available upon request by TEA and/or an auditor.

**Q4: Will an LEA be asked to provide documentation for any of the self-check items in Part 5 that were reported as “Not In Compliance” in the year after such report?**

A4: LEAs reporting “Not In Compliance” for a compliance requirement in Part 5 of the PR1000 Title I, Part A Compliance Report are required to include in the report a description of how the LEA plans to meet compliance the following year. The LEA should maintain documentation locally to show evidence that the LEA engaged in the plan reported to meet compliance the following year. The LEA is required to maintain documentation locally and to be made available upon request by TEA and/or an auditor.

### **A. LEA Program Plan**

**Q1: Is it acceptable to include the requirements related to the Title I, Part A LEA Program Plan in different parts of the District Improvement Plan based on where the activities correspond to the LEA goals noted in the plan or should the requirements be together in one section of the plan?**

A1: It is acceptable for the LEA to include the requirements related to the Title I, Part A LEA Program Plan in different parts of the District Improvement Plan based on where the activities correspond to the LEA goals noted in the plan. In the event of an audit and/or random validation monitoring, the LEA should be able to identify all the statutory requirements in the District Improvement Plan that are related to the Title I, Part A program.

**Q2: Does an LEA Title I, Part A Program Plan need to specifically include the Title I, Part A rank and serve calculations documentation?**

A2: ESSA Section 1112(b)(4) requires that to ensure that all children receive a high-quality education, and to close the achievement gap between children meeting the challenging State academic standards and those children who are not meeting such standards, each local educational agency plan shall describe the poverty criteria that will be used to select school attendance areas under section 1113.

ESSA Section 1113(a)(5) makes reference to the following poverty criteria and does not apply to LEAs with an enrollment of less than 1,000 children.

(A) IN GENERAL.—Except as provided in subparagraph (B), a local educational agency shall use the same measure of poverty, which measure shall be the number of children aged 5 through 17 in poverty counted in the most recent census data approved by the Secretary, the number of children eligible for a free or reduced price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.), the number of children in families receiving assistance under the State program funded under part A of title IV of the Social Security Act, or the number of children eligible to receive medical assistance under the Medicaid Program, or a composite of such indicators, with respect to all school attendance areas in the local educational agency—

- (i) to identify eligible school attendance areas;
- (ii) to determine the ranking of each area; and
- (iii) to determine allocations under subsection (c).

(B) SECONDARY SCHOOLS.—For measuring the number of students in low-income families in secondary schools, the local educational agency shall use the same measure of poverty, which shall be—

- (i) the measure described under subparagraph (A); or
- (ii) subject to meeting the conditions of subparagraph (C), an accurate estimate of the number of students in low-income families in a secondary school that is calculated by applying the average percentage of students in low-income families of the elementary school attendance areas as calculated under subparagraph (A) that feed into the secondary school to the number of students enrolled in such school.

(C) MEASURE OF POVERTY.—The local educational agency shall have the option to use the measure of poverty described in subparagraph (B)(ii) after—

- (i) conducting outreach to secondary schools within such agency to inform such schools of the option to use such measure; and
- (ii) a majority of such schools have approved the use of such measure.

At minimum, the LEA shall include in the LEA Title I, Part A Program Plan the measure of poverty being utilized to determine Title I, Part A eligibility and campus allocations. It would be best

practice to also include the rank and serve process utilized for allocating Title I, Part A funds to campuses. The documentation for calculating campus allocations, which includes the per pupil allocation per low-income child, does not need to be included in the plan. However, such documentation should be maintained locally and available upon request from TEA and/or an auditor.

## **B. Parent and Family Engagement**

**Q1: Where is there information related to evaluating the content and effectiveness of the LEA written Parent and Family Engagement (PFE) Policy?**

A1: The [Title I, Part A Written Parent and Family Engagement Policy Toolkit](#) produced by the [Title I, Part A Parent and Family Engagement Statewide Initiative](#) includes general guidance and information related to the evaluation of effectiveness of the LEA PFE policy.

**Q2: Is it allowable for the Annual Title I Meeting to be held in conjunction with another school activity (i.e., Meet the Teacher Night, Back to School Fair, etc.)?**

A2: It is allowable for the Annual Title I Meeting to be held in conjunction with another school activity, as long as all the information required to be shared as per statute is shared. Additionally, the campus would need to maintain the documentation necessary to show evidence that the meeting took place (i.e., meeting invitations, meeting agendas, meeting minutes or notes, meeting participant rosters/sign-in sheets, meeting materials showing that the required content was shared). Additional information can be found in the [Annual Title I Meeting Toolkit](#) produced by the [Title I, Part A Parent and Family Engagement Statewide Initiative](#). Please note that TEA requires that the Annual Title I meeting be offered on more than one day and at more than one time, so that parents have more than one option to attend.

**Q3: For the Parent and Family Engagement requirement noted in Part 5.B.6. of the PR1000 – Title I, Part A Compliance Report related to the LEA and campus personnel PFE training, what does “with the assistance of parents” mean?**

A3: ESSA Section 1116(e)(3) requires that the LEA and Title I, Part A campuses shall educate teachers, specialized instructional support personnel, principals, and other school leaders, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school.

“With the assistance of parents” includes that the training be created with the assistance of parents to identify the needs of the parents and to determine what are the best ways to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school. “With the assistance of parents” can also mean that parents take part in providing the training.

**Q4: For the Parent and Family Engagement requirement noted in Part 5.B.6. of the PR1000 – Title I, Part A Compliance Report related to the LEA and campus personnel PFE training, what should be included in the training?**

A4: ESSA Section 1116(e)(3) requires that the LEA and Title I, Part A campuses shall educate teachers, specialized instructional support personnel, principals, and other school leaders, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school.

At minimum, the training should include information in value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school.

### **C. Campus Schoolwide Program Plan**

**Q1: For the Campus Schoolwide Program Plan requirement noted in Part 5.C.2. of the PR1000 – Title I, Part A Compliance Report, what does evidence of coordination and integration look like?**

A1: ESSA Section 1114(b)(5) requires that the Title I, Part A Schoolwide program plan is developed in coordination and integration with other Federal, State, and local services, resources, and programs, such as programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start programs, adult education programs, career and technical education programs, and schools implementing comprehensive support and improvement activities or targeted support and improvement activities under section 1111(d).

Evidence of coordination and integration includes having a campus schoolwide program plan showing evidence of coordination and integration documented with the various applicable program descriptions and outlining use of funds for the various applicable programs noted in statute (the requirements related to the Campus schoolwide program plan can be included in the Campus Improvement Plan or other Campus official plans). Additionally, the campus would also have meeting agendas, meeting minutes or notes, and documentation of attendance (i.e., sign-in sheets, electronic attendance rosters) from the campus planning process showing evidence of coordination and integration of the programs noted in statute.

**Q2: For the Campus Schoolwide Program Plan requirement noted in Part 5.C.3. of the PR1000 – Title I, Part A Compliance Report, there has been an emphasis by TEA that stakeholders are listed as plural and thus it is required to have more than one stakeholder for each group referenced in statute. How does this apply to a campus Principal where there is only one Principal?**

A2: ESSA Section 1114(b)(2) requires that an eligible school operating a schoolwide program shall develop a comprehensive plan (or amend a plan for such a program that was in existence on the day before the date of the enactment of the Every Student Succeeds Act) that—is developed with the involvement of parents and other members of the community to be served and individuals who will carry out such plan, including teachers, principals, other school leaders, paraprofessionals present in the school, administrators (including administrators of programs described in other parts of this title), the local educational agency, to the extent feasible, tribes and tribal

organizations present in the community, and, if appropriate, specialized instructional support personnel, technical assistance providers, school staff, if the plan relates to a secondary school, students, and other individuals determined by the school.

It is understood that in most cases, a campus only has one campus principal. It would be best practice to reference that on the stakeholder listing. In the case of a random validation monitoring, TEA may request confirmation from the LEA that there is only one principal on the campus if it is not noted on the documentation submitted.

**Q3: Is it acceptable for the Title I, Part A Campus Schoolwide Program Plan requirements to be included in the Campus Improvement Plan?**

A3: It is acceptable for the requirements related to the Campus schoolwide program plan to be included in the Campus Improvement Plan or other Campus official plans. In the event of an audit and/or random validation monitoring, the LEA should be able to identify all the statutory requirements in the Campus Improvement Plan that are related to the Title I, Part A program.

**D. Supplement, Not Supplant**

**Q1: For SNS, if you can exempt a category such as the middle schools and the high schools, but you can't exempt the elementary schools, do you just have to have a methodology that year that shows how you allocated local funds to the elementary schools only?**

A1: In a case where the LEA is excluding one or more categories of campuses (i.e., middle schools and high schools) from its methodology, the LEA should indicate that the basis on which the categories are being excluded. For example, the LEA is excluding the middle schools because all of them are non-Title I, Part A campuses, and the LEA is excluding the high school because there is only one high school. The LEA would then proceed with the methodology for the elementary schools. This would make it easy to see that the LEA has accounted for all of its campuses, and would also provide the LEA with a complete rationale in the event that new personnel needed to update the methodology in the future.

**PR1000 – Title I, Part A Compliance Report – Part 6 Question**

**Q1: What information would be included for Part 6 (Additional Information) of the PR1000 – Title I, Part A Compliance Report?**

A1: Part 6 is optional. The LEA can provide any additional information applicable to the PR1000 Compliance Report in the comment box, if desired.