

Title I, Part A - Frequently Asked Questions

This document provides the answers to Title I, Part A-related questions received by the Division during the months noted below. You can also navigate through the document using the Bookmarks in your PDF viewer.

[May/June 2020](#) | [July 2020](#) | [August 2020](#) | [September 2020](#) | [October 2020](#)

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

May/June 2020

Questions and responses are organized by the following topic areas for May/June 2020:

- [Campus Improvement Plan \(CIP\)/District Improvement Plan \(DIP\)](#)
- [Early Childhood Education](#)
- [ESSA Consolidated Federal Grant Application](#)
- [New Title I, Part A Campus Processes](#)
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- [Targeted Assistance Program](#)
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Campus Improvement Plan (CIP)/District Improvement Plan (DIP)

Q1: Our LEA is comprised of only three campuses: high school (not served), middle school (not served), and elementary (schoolwide). Can our CIP and DIP be one document? Are there any parameters?

A1: It is acceptable for a small LEA or single campus LEA to have a document that consolidates the CIP and DIP into one document, but they must identify goals/activities separately for the district and campuses. For audit and/or random validation monitoring purposes, an LEA may be asked to identify specific goals/activities listed in their DIP and CIP to support the activity. If the expense is charged at the campus level, an auditor will want to see that activity identified in the CIP. Similarly, if the expense is charged at the LEA level, an auditor will want to see the activity identified in the DIP.

Although a Campus Improvement Plan is required for Title I, Part A campuses, state law requires all campuses to have a CIP and all LEAs to have a DIP. TEC 11.252 lists the state requirements for the DIP. But the LEA should also review the Title I, Part A provisions and assurances to see what assurances and descriptions are required to be included in the plan. (Likewise, for other federal grant programs the LEA participates in.) TEC 11.253 lists the state requirements for each CIP. If

the LEA is wanting a single document to serve for all its campuses, it should be very clear which campus needs, goals, and activities go with which campus. The LEA should also review the Title I, Part A provisions and assurances for schoolwide programs to be sure that all of the required descriptions and assurances are included for the campus that is schoolwide.

Q2: Do we document 2020-2021 Title I, Part A activities funded with 2019-2020 funds in the campus and district improvement plans for 2020-2021 or 2019-2020?

A2: If Title I, Part A funded activities are taking place in the 2020-2021 school year, they should be based on the comprehensive needs assessment conducted for the 2020-2021 school year and included in the 2020-2021 plans. If the activities took place in the 2019-2020 school year, they should be based on the comprehensive needs assessment conducted for the 2019-2020 school year and included in the 2019-2020 plans.

Early Childhood Education

Q1: Are Title I campuses required to have a Pre-K program or is this optional?

A1: There is no requirement in ESSA that requires Title I campuses to provide a pre-kindergarten program. For questions related to state requirements associated with pre-kindergarten programs, please reach out to the [TEA Early Childhood Education Division](#).

ESSA Consolidated Federal Grant Application

Q1: It is my understanding that LEAs need to have a public hearing for the ESSA application. Can you tell me what information must be included or what that might look like? When does this public hearing need to take place? Before or after the submission of the ESSA Application?

A1: As per ESEA Section 8306(a)(7) and the ESSA section of the Program-Specific Provisions and Assurances, upon submission of the ESSA Consolidated Federal Grant Application, an LEA is to assure that “before the application was submitted, the applicant afforded a reasonable opportunity for public comment on the application and considered such comment.”

If an LEA chooses to meet this requirement via a public hearing, the LEA would follow their local policies and procedures related to public hearings. Additionally, the LEA would want to ensure that the public had time to review the ESSA Consolidated Federal Grant Application before the public hearing so that they are able to provide comments on the content of the application. As per statute, the opportunity for public comment on the application and consideration of such comment would need to take place before the application is submitted. Documentation of this requirement would be retained locally and could include the dates in which the public was provided with the opportunity to review the application prior to the public hearing, the public hearing notice, public hearing agenda and public hearing minutes.

New Title I, Part A Campus Processes

Q1: When an LEA launches a new school, how does/what is the process for that campus to receive Title I, Part A funding?

- A1: The process an LEA follows to launch a new campus that is eligible to receive Title I, Part A funding is generally a two-step process with many other processes embedded in each of the steps. We have provided general information for the two steps and references to resources that provide the detailed intricacies for each of the steps. Additionally, the LEA can reach out to its regional Education Service Center Title I, Part A contact for technical assistance and support related to the processes. The technical assistance and support for this process are provided under the ESC ESSA Basic Services Initiative and are free of charge to LEAs.

Step 1: Determine Title I Campus Eligibility

Campus eligibility for Title I, Part A is determined through the SC5000 schedule which the LEA completes as part of its ESSA Consolidated Federal Grant Application in eGrants.

Detailed information related to Title I, Part A campus eligibility can be found in the following documents: [Schedule SC5000 Title I, Part A Campus Selection – ESSA Consolidated Federal Grant Application Guidance Document](#) and Section II. C. Campus Eligibility of the [Title I, Part A – Improving Basic Programs Program Guide](#).

Step 2: Determine the Title I program the school will implement

Once it is determined that a campus meets Title I eligibility requirements, the campus will need to determine which Title I program (Targeted Assistance Program or Schoolwide Program) the school will implement based on the eligibility requirements for each program.

Schoolwide Program

A schoolwide program permits a school to use funds from Title I, Part A and other federal programs to upgrade the entire education program in a Title I school to improve the achievement of the lowest achieving students. This contrasts with a Title I, Part A targeted assistance program, in which Title I, Part A funds are used only for programs that provide services to eligible children identified as failing, or being most at risk of failing to meet the state's challenging academic standards.

Generally, speaking, to be eligible for a Schoolwide Program, the campus must have a low-income percentage of at least 40%. (If the campus is eligible for Title I, Part A, but does not meet the 40% threshold, it is possible to request a SW Eligibility waiver in the ESSA Consolidated Federal Grant Application.)

ESSA Section 1114(b)(1)(A) states that an eligible school operating a schoolwide program shall develop a comprehensive plan that is developed during a 1-year period, unless—the local educational agency determines, in consultation with the school, that less time is needed to develop and implement the schoolwide program. The Schoolwide Program section of the [Title I, Part A – Improving Basic Programs Program Guide](#) provides the requirements for the comprehensive plan that is based on the comprehensive needs assessment.

If the LEA determines, in consultation with the school, that less time is needed to develop and implement the schoolwide program, the LEA would need to retain documentation to that effect. All documentation to demonstrate compliance for schoolwide planning must be

Response
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maintained locally for audit and validation/monitoring purposes. Documentation of the planning process must include a comprehensive needs assessment, the inclusion of the required stakeholders in the process, incorporation of the required descriptions into the Campus Improvement plan, **documentation related to parent and family engagement (PFE) requirements (i.e. school-parent compact and PFE policy)**, and the provision for an evaluation of program effectiveness that will inform the next year's needs assessment and planning. If the LEA determines that ESC training/technical assistance was part of the reason that less time was needed to develop and implement the schoolwide program, then the LEA would need to keep such documentation in addition to the documentation noted above.

Detailed information related to Title I, Part A Schoolwide Program Requirements can be found in the following document: Section II. E. Schoolwide Program Requirements of the [Title I, Part A – Improving Basic Programs Program Guide](#).

Targeted Assistance Program

A Targeted Assistance (TA) Program provides services to eligible children identified as having the greatest need for special assistance. Targeted assistance program campuses are either ineligible for a schoolwide program or have chosen not to operate a schoolwide program. A campus may be served as a Targeted Assistance campus, provided the campus is Title I, Part A eligible (at least 35% low-income, or equal to or greater than the LEA low-income percentage). TA campuses may only serve students identified in greatest need of services. Students must be selected for services based on multiple, educationally related, objective criteria established by the LEA. The selection criteria may be supplemented by the campus. The criteria for determining student eligibility for students served on TA campuses must be included in the District and the Campus improvement plans.

Detailed information related to Title I, Part A Schoolwide Program Requirements can be found in the following document: Section II. F. Targeted Assistance Programs of the [Title I, Part A – Improving Basic Programs Program Guide](#).

Stakeholders

- Q1: If a campus only has 1 administrator (Principal) how do they meet the requirement to include school leaders, principals, and administrators mentioned in statute? Our LEA has one campus with one principal and six teachers that make up their school community. If a campus does not have paraprofessionals, are they excused from having that role represented on their campus?**
- A1:** We understand that small LEAs may not have multiple people to meet the required stakeholder requirements for a group of stakeholders or even at least 1 person to represent a particular group of required stakeholders. To justify that all of the required stakeholders were not part of the process because the roles did not exist within the LEA, it can be noted on the sign in sheet retained as documentation locally. However, this does not mean that an LEA can exclude a group of stakeholders because they weren't invited to participate and were an available group of stakeholders in the LEA. The LEA would not be required to have paraprofessionals represented on

the committees if the LEA has no paraprofessional staff. The LEA would be expected to have more than one parent representative.

Q2: Statutory language for Title I, Part A, states “if appropriate, specialized instructional support personnel, technical assistance providers, school staff...” Does the “if appropriate” apply to all of the positions that follow? Or does it only apply to the specialized instructional staff?

A2: “If appropriate,” applies to all of the positions that follow.

Q3: Title I, Part A requires representation from LEA-level staff – that would mean any administrator of the LEA?

A3: The Schoolwide Program Plan is to be developed with the involvement of the LEA. This would include an LEA-level individual or individuals who have relevant knowledge of the campus needs and have been involved in the campus needs assessment process.

Q4: Does an LEA need to have one master sign-in sheet for Federal Programs meetings (i.e. Comprehensive Needs Assessment (CNA), CIP, DIP, etc.) or should the sign-in sheets be separate for each program (ex. Title I, Title II and Title IV)?

A4: If an LEA chose to use that option, one master sign-in-sheet would suffice for all programs administered in the Federal Program Compliance Division. To ensure compliance can be established in an audit or random validation, each sign in sheet should include the purpose, date, and time of the meeting; stakeholder name; stakeholder group represented on the committee; and the stakeholder’s signature indicating that they were present at the meeting. It is also important to note that each program has their individual requirements for stakeholder groups that are required to be involved for different purposes. Thus, it is also important for LEAs to retain detailed agendas and minutes of meetings as documentation related to the specific program requirements.

Targeted Assistance Program

Q1: Can you assist in helping me understand the ESSA language below (Section 1115, Targeted Assistance campuses)? Does the highlighted language below mean that a district could use Title I, Part A funds to implement the program described below for all students?

Each targeted assistance program SHALL use methods and instructional strategies to strengthen the academic program of the school...

- ***Activities may include expanded learning time, before- and after-school programs, summer programs and opportunities, a schoolwide tiered model to prevent and address behavior problems, and early intervening services.***

A1: The statutory language related to the bullet you referenced is as follows.

TARGETED ASSISTANCE SCHOOL PROGRAM.—To assist targeted assistance schools and local educational agencies to meet their responsibility to provide for all their students served under this

part the opportunity to meet the challenging State academic standards, each targeted assistance program under this section shall—

(2) serve participating students identified as eligible children under subsection (c), including by—

(B) using methods and instructional strategies to strengthen the academic program of the school through activities, which may include—

(i) expanded learning time, before- and afterschool programs, and summer programs and opportunities; and

(ii) a schoolwide tiered model to prevent and address behavior problems, and early intervening services, coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.);

The shall refers to serving participating students identified as eligible children with activities which may include “a schoolwide tiered model to prevent and address behavior problems, and early intervening services, coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.)”

Since the recommended (“may include”) activity refers to serving participating students identified as eligible children, it would not be allowable to use Title I, Part A funds to implement this activity schoolwide for all students in a Targeted Assistance campus.

Use of Funds

Q1: If our LEA has determined through the needs assessment process that additional focus is needed on early literacy and parental involvement strategies, is it possible to fund a Director or Program Coordinator for early literacy or parental involvement from Title I, Part A funds?

A1: Based on the job duties and responsibilities associated with the position of Director or Program Coordinator, the position could be considered a direct program cost or a direct administrative cost. Additional information about such costs can be found in the [ESSA Consolidated Application Instructions](#) (BS6001 Section). Such costs are generally allowable under Title I, Part A as long as the LEA meets the Title I, Part A Use of Funds requirements as noted on the [Title I, Part A Use of Funds document](#). Additionally, if the position is an LEA-level position, it would need to be budgeted as funds reserved at the LEA level.

Q2: Is it allowable to use Title I, Part A funds to pay for shipping and the distribution costs of the Texas Home Learning packets to parents of students most in need?

A2: If the campuses are schoolwide campuses, this would not be a problem, as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If one or more of the campuses is Targeted Assistance, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If one or more of the campuses is a non-Title I campus, this would not be an allowable use of funds for those campuses. Please refer to the [Title I, Part A Use of Funds document](#) as well.

Elements of this question are answered in the [Federal Funding & Grants COVID 19 FAQ Document](#) (5/7/2020) published on the TEA website referenced below.

Eligible Uses of Grant Funds Section

2. Can LEAs use federal grant funds to provide hotspots for students without home Internet access or other costs associated with Learning from Home programs? Updated April 14, 2020

Many school systems around the state are working to expand wireless hotspot locations in communities where free commercial Internet services are not otherwise available. Please document all costs associated with these expenditures, in anticipation that additional funding streams may become available as Congress continues to authorize financial support for COVID-19.

In the meantime, there are many sources of funds currently available to be redeployed for these types of purposes:

ESSA, Title I, Part A served Schoolwide campuses may use their Title I, Part A funds to provide internet hot spots, technology resources, and other at home learning costs as long as it is identified in the campus comprehensive needs assessment (CNA) as a need.

Note: *As long as the LEA has the required supplement, not supplant methodology documented and implemented, there is not a supplanting issue.*

ESSA, Title IV, Part A may also be a potential federal fund source. However, Title IV has the traditional rules of supplant so it is only allowable if the LEA has not previously spent state or local funds for the same costs this year or in the prior year.

Other state or local funds may also be used for these types of activities, but keep in mind it may cause a supplant issue for the use of ESSA, Title IV, Part A funds as described above.

- Q3: Title I, Part A allowable use of funds allows for organizational memberships as long as the membership is in the name of the LEA. However, there are some organizations that do not offer organizational memberships. We have parent liaisons who want to join an organization for the purpose of obtaining information for sharing with parents. Would this be allowable under Title I, Part A?**
- A3:** Costs associated with membership dues or fees for business, technical, and professional organizations directly related to and necessary to carry out the objectives of the grant are generally allowable under Title I, Part A as long as the LEA meets the requirements as noted on the [Title I, Part A Use of Funds document](#).
- Q4: Our LEA wants to purchase a print instructional resource to send home to parents who do not have technology available. We want to use Title I, Part A funds to pay for this for the eligible campuses and will use other funds for the non-Title I funds. While this has become a district initiative due to COVID-19, it is mostly an equity issue for students and families who are unable**

to afford multiple devices, or any, to complete schoolwork. We are hoping to also purchase summer school materials to send home to lessen the summer slide for all students. Is this an allowable Title I, Part A use of funds?

- A4: Elements of this question are answered in the [Federal Funding & Grants COVID 19 FAQ Document](#) (5/7/2020) published on the TEA website referenced below:

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ESSA, Title I, Part A served Schoolwide campuses may use their Title I, Part A funds to provide internet hot spots, technology resources, and other at home learning costs as long as it is identified in the campus comprehensive needs assessment (CNA) as a need.

Note: *As long as the LEA has the required supplement, not supplant methodology documented and implemented, there is not a supplanting issue.*

ESSA, Title IV, Part A may also be a potential federal fund source. However, Title IV has the traditional rules of supplant so it is only allowable if the LEA has not previously spent state or local funds for the same costs this year or in the prior year.

Other state or local funds may also be used for these types of activities, but keep in mind it may cause a supplant issue for the use of ESSA, Title IV, Part A funds as described above.

Please refer to the [Title I, Part A Use of Funds document](#) as well.

- Q5: If we are going to be running a district-wide summer school for students that are failing, do all students have to be from Title I campuses in order to pay the teachers with Title I, Part A funds?**

- A5: The basic way in which an LEA should determine whether certain activities are allowable uses of Title I, Part A funds has not changed. Title I-funded summer school needs to be for Title I eligible students. Which would mean that the program for failing students from non-Title I campuses would be paid with SCE funds. The LEA would need to ensure that they retain documentation showing this in the case of an audit or random validation monitoring review. The LEA should refer to the items listed in the [Title I, Part A Use of Funds document](#) and ascertain whether the LEA is in compliance.

Per the “[COVID-19 AND FEDERAL GRANT FUNDS: FREQUENTLY ASKED QUESTIONS](#),” Use of Funds Section, Question 6:

“LEAs will receive all flexibilities available to TEA in the use of their federal grant funds. Information on stimulus funding for education is expected in the next 30 days to address COVID-19 needs; therefore, we do not anticipate significant changes to how you expend your current federal grant funds unless the needs of your students and school communities change. After you update your comprehensive needs assessment, you may consider changes to the planned uses of your federal grant funds. Refer to the When to Amend guidance document and submit amendments (by email or eGrants only) when necessary.

District’s planning process for the next school year may also need to be altered. TEA will be flexible in compliance reviews if you document your circumstances and try to meet the intent of the law as best as you can at the time.”

Q6: Our Homeless Department has requested to purchase face coverings for teachers and students that are tutoring and/or being tutored at local homeless shelters. Would this be allowable with Title I, Part A funds?

A6: Costs associated with the purchasing of face coverings directly related to and necessary to carry out the objectives of the grant are allowable under Title I, Part A as long as the LEA meets the requirements as noted on the [Title I, Part A Use of Funds document](#).

Q7: Our LEA has a Parent Engagement Specialist that is 50% funded from the district reservation for parent engagement. The specialist, while not specifically assigned to any one campus, facilitates the compacts, policies and parent engagement activities at each of the campuses. Can the funding for the specialist remain at the LEA level, or should the specialist be split-funded across each of the campuses?

A7: If the employee is providing LEA-specific PFE responsibilities, the time the employee spends on such responsibilities would be considered district reservation time. If the employee is providing Campus-specific PFE responsibilities, the time the employee spends on such responsibilities would be considered at the campus level. Additionally, the LEA would need to ensure that they are following LEA policies and procedures related to the classification of employees (LEA vs. campus). The LEA would need to retain detailed documentation in case of an audit or random validation monitoring review.

Q8: If a district is required to provide 90% of their reservation for parent engagement back to the campuses, can the 90% be captured in time and effort for the parent liaison?

A8: If the employee is providing Campus-specific PFE responsibilities, the time the employee spends on such responsibilities would be considered at the campus level. Additionally, the LEA would need to ensure that it is following LEA policies and procedures related to the classification of employees (LEA vs. campus). The LEA would need to retain detailed documentation in case of an audit or random validation monitoring review.

Q9: Can we pay a current employee for contracted services (6200) out of Federal Funds (Title I) for leading professional development outside of her normal contract days or would this be an Extra-Duty Pay Agreement and be paid out of 6100 Salaries?

A9: Professional development is an allowable use of funds under Title I, Part A as long as it is being provided for Title I, Part A teachers and the use of funds steps and requirements are followed as per the [Title I, Part A Use of Funds document](#). The LEA would also need to ensure it is compliant with the SNS requirements associated with Title I, Part A. For Title I, Part A, the LEA would meet the SNS requirement by having a valid SNS methodology or Statement of Exemption.

As far as the method used to pay for the services, the LEA would need to follow its local policies and procedures related to employee compensation in determining how to compensate the employee for providing professional development services.

Q10: Is it allowable to provide incentive pay out of Title I, Part A to non-STAAR teachers (K-6), Instructional Coach, Interventionist and an Assistant Principal?

A10: The LEA would need to ensure that it is following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA would specifically need to be able to document that this use of funds meets the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Providing incentive pay to the individuals listed might not meet the intent and purpose of the law. It would be advisable that the LEA pay for its STAAR teachers out of Title I, Part A funds because that would be more in line with the intent and purpose and use local funds to pay for their non-STAAR teachers and the other administrators noted. Additionally, the use of funds would need to have been identified in the comprehensive needs assessment.

Q11: Can cap and gowns be purchased with Title I Part A funds?

A11: Costs associated with the purchasing of caps and gowns for students are allowable under Title I, Part A as long as the LEA meets the Title I, Part A Use of Funds requirements as noted on the [Title I, Part A Use of Funds document](#). The use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan. The LEA should consider purchasing the caps and gowns and retaining them for future use.

Additionally, the caps and gowns could only be purchased for students attending schoolwide campuses as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If a campus is a Targeted Assistance campus, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If the students attend non-Title I campuses, this would not be an allowable use of funds for those campuses.

Q12: The district has selected to use a majority of their Title I, Part A funds to pay for a district-wide Curriculum director. The responsibilities include managing the ESSA program and provide curriculum support K-12. The district does qualify for an SNS exemption. They can answer yes questions outlined on the “Use of Funds” page. Would this be allowable with Title I, Part A funds?

A12: If the LEA meets all the Title I, Part A use of funds requirements, it would be considered allowable to pay the salary of a district-wide Curriculum Director taking into consideration the following guidance. For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on Title I, Part A activities. It would also be advisable to note the Title I, Part A duties in the job descriptions for audit and/or random validation purposes. Additionally, if the LEA has any non-schoolwide campuses, this is a difficult thing to justify. The curriculum is to the benefit of all the LEA's students.

The LEA should also consider that the time spent on program administration activities would be considered activities to be conducted with reserved funds. If the employee is providing LEA-specific Title I, Part A responsibilities, the time the employee spends on such responsibilities would be considered district reservation time. If the employee is providing campus-specific Title I, Part A responsibilities, the time the employee spends on such responsibilities would be considered at the campus level. Additionally, the LEA would need to ensure that it is following LEA policies and procedures related to the classification of employees (LEA vs. campus). The LEA would need to maintain detailed documentation in case of an audit or random validation monitoring review.

Q13: We are working on an idea to help parents get their students registered for Pre-Kindergarten remotely. Online registration can be challenging for some parents and we typically have a large group come into our early childhood education centers to get help filling out documents. The assistant typically sits with parents and does the online registration with the parents. In preparing for the possibility that we may not be able to do this in person, we want to set up a helpline for parents to call in and get assistance with registration. Can the funds from the Title I Pre-K district reservation be used to pay teacher assistants extra-duty pay to assist parents with this process?

A13: Costs associated with providing parents with support for navigating school systems and processes are allowable under Title I, Part A as long as the LEA meets the requirements noted on the [Title I, Part A Use of Funds document](#). The use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan.

If all the students will be attending Title I, Part A schoolwide campuses, it shouldn't be an issue. On a targeted assistance campus, services should only be provided to students identified as most in need to receive the Title I, Part A services. The only potential issue is providing parent support for non-Title I campuses as it would be an unallowable use of funds for those campuses.

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July 2020

Questions and responses in this FAQ document are organized by the following topic areas for July 2020:

- [Campus Improvement Plan \(CIP\)/District Improvement Plan \(DIP\)/Needs Assessment](#)
- [Community Eligibility Provision \(CEP\)](#)
- [Parent and Family Engagement Reservation](#)
- [Parent Liaison Job Duties](#)
- [Title I Training](#)
- [Use of Funds](#)

Campus Improvement Plan (CIP)/District Improvement Plan (DIP)/Needs Assessment

Q1: Are charter schools with only one campus required to complete a District Needs Assessment or District Improvement Plan under ESSA?

A1: It is acceptable for a small LEA or single campus LEA to have a document that consolidates the CNA, CIP and DIP into one document, but they must identify needs and goals/activities separately for the district and campuses. For audit and/or random validation monitoring purposes, an LEA may be asked to identify specific needs and/or goals/activities listed in their DIP and CIP to support the activity. If the expense is charged at the campus level, an auditor will want to see that activity identified in the CIP. Similarly, if the expense is charged at the LEA level, an auditor will want to see the activity identified in the DIP.

Although a Campus Improvement Plan is required for Title I, Part A campuses, state law requires all campuses to have a CIP and all LEAs to have a DIP. TEC 11.252 lists the state requirements for the DIP. But the LEA should also review the Title I, Part A provisions and assurances to see what assurances and descriptions are required to be included in the plan. (Likewise, for other federal grant programs the LEA participates in.) TEC 11.253 lists the state requirements for each CIP. If the LEA is wanting a single document to serve for all its campuses, it should be very clear which campus needs, goals, and activities go with which campus. The LEA should also review the Title I, Part A provisions and assurances for schoolwide programs to be sure that all of the required descriptions and assurances are included for any campus that is schoolwide.

Community Eligibility Provision (CEP)

Q1: Our LEA has two campuses. The elementary/junior high is served with Title I, Part A funds. The high school is not. The district is moving to the CEP funding process for 20-21. Must the high school now receive Title I, Part A funding?

A1: As a single attendance area, the LEA has the option to choose which of its eligible campuses to serve.

Parent and Family Engagement (PFE) Reservation

- Q1:** As we share the April campus estimates for Title I, Part A with our campus principals, I wanted to be sure to provide the most updated information on what is allowable with the PFE reservation. Can you please point me in the right direction? Are there any changes based on the CARES Act?
- A1:** At least 90% of the funds reserved at the LEA for Parent and Family Engagement shall be distributed to Title I, Part A schools, with priority given to high-need schools. The LEA shall involve parents and family members of children in Title I, Part A served campuses in the decisions regarding how reserved Title I, Part A funds are allotted for parent and family engagement activities. Funds reserved to carry out parent and family engagement activities shall be used to carry out activities and strategies that are consistent with the LEA's parent and family engagement policy, including at least one of the following:
- Supporting schools and nonprofit organizations in providing professional development for LEA and school personnel regarding parent and family engagement strategies, which may be provided jointly to teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, early childhood educators, parents and family members.
 - Supporting programs that reach parents and family members at home, in the community, and at school.
 - Disseminating information on best practices focused on parent and family engagement, especially best practices for increasing the engagement of economically disadvantaged parents and family members.
 - Collaborating, or providing subgrants to schools to enable such schools to collaborate, with community-based or other organizations or employers with a record of success in improving and increasing parent and family engagement.
 - Engaging in any other activities and strategies that the LEA determines are appropriate and consistent with the LEA's parent and family engagement policy.

For additional information related to the Parent and Family Engagement Requirements, you can also refer to the [Title I, Part A Program Guide](#).

The requirements associated with the Title I, Part A parent and family engagement reservation were not impacted by the CARES Act. For CARES Act information, please visit the [CARES Act Funding and COVID Expense Reimbursement FAQ](#).

Parent Liaison Job Duties

- Q1:** We are looking to add the following job duties to our parent liaison. Would this be allowable?
1. Work with individual and/or small groups of students in corrective or reinforcement activities assigned by the teacher except where certain programs may prohibit supervision of a given activity.

2. **Assist the teacher in implementing special strategies for reinforcing material or skills based on a sympathetic understanding of individual students, their needs, interests and abilities.**
3. **Assist with supervision of students.**

A1: Assignment of job duties is a local decision. Although the duties you are wanting to add do seem to meet the intent and purpose of Title I, Part A, they would not be considered parent and family engagement duties as they are tied to student instruction. You may consider revising the job title and function in the job description document to include instructional duties. This would ensure that your documentation maintained locally is as accurate as possible in the case of an audit. Additionally, you would want to ensure that the instructional duties referenced are tied to a need based on a comprehensive needs assessment and documented in the campus improvement plan.

Adding the instructional duties might also change some of the budget coding for the position. For example, if the LEA was using funds reserved for parental involvement activities to pay for the parent liaison, but then added the instructional duties, the LEA would want to be sure that only an appropriate percentage of the salary was coded to the parental involvement reservation.

Title I Training

Q1: We are training our new principals remotely on the Title I, Part A program. To whom will I send the attestation letters that they sign indicating that they have received the training? Is it an email or an upload to TEASE/TEAL?

A1: The only “attestation” related to principals is the NCLB principal attestation that the principal was aware of the Highly Qualified teacher status and para status of all the Title I teachers and paras. The attestations were kept locally. However, the NCLB requirement for attestations is not in the ESSA statute and thus is no longer a requirement for LEAs.

Use of Funds

Q1: Scenario: Schools A, B, C & D were Title I, Part A Schoolwide Campuses in 2019-2020; Schools A & B fell out of Title I eligibility in 2020-2021; Schools C & D remain Title I, Part A Schoolwide Campuses in 2020-2021

Question: If electronic devices were purchased with Title I, Part A funds for students in Schools A, B C & D in 2019-2020 and were issued to students, does the LEA have to take the devices from students in Schools A & B for 2020-2021 and transfer the devices for use in Schools C & D in 2020-2021?

A1: There are 2 options your LEA has to ensure compliance with EDGAR.

Option 1: The LEA would determine if there is a need for the devices at any Title I, Part A campuses. If yes, the devices would need to be transferred to the Title I, Part A campuses where there is a need. If no, the LEA would need to document that such a need doesn't exist, why a need doesn't exist and how the LEA made that determination, and then proceed to determine if there is a need for the devices in any other Federal Program. If

yes, the devices would need to be transferred to the other Federal Program where there is a need. If no, the LEA would need to document that such a need doesn't exist, why a need doesn't exist and how the LEA made that determination.

If the LEA determines and documents that a need doesn't exist for the devices in any Title I, Part A campus nor in any other Federal Program, then the devices can remain on the non-Title I, Part A campuses. Maintain documentation locally in the case of an audit.

Option 2: The LEA can purchase them at the depreciated rate with local/state funds and the funds from the purchase would go back into the Title I, Part A Program. This would need to be documented locally in the case of an audit.

Q2: I have a question regarding the possibility of leasing computers with Title I, Part A funds. Could you tell me where I might find guidance on this and if it is an allowable use of funds?

A2: Costs associated with the purchasing or leasing of computers are allowable under Title I, Part A as long as the LEA meets the requirements noted on the [Title I, Part A Use of Funds document](#).

As per the [Budgeting Costs Guidance Handbook](#), rentals and leases for equipment, including the rental or lease of computers are considered Professional and Contracted Services (6200) costs that do not require specific approval.

Q3: I received a request to purchase an instructional software program for special education students only that are at a Title I, Part A campus. Is this allowable?

A3: Costs associated with software programs used to support students are allowable under Title I, Part A as long as the LEA meets the requirements noted in the [Title I, Part A Use of Funds document](#). The use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan.

If all the students will be attending Title I, Part A schoolwide campuses, it shouldn't be an issue. On a targeted assistance campus, services should only be provided to students identified as most in need to receive the Title I, Part A services.

Q4: A Title I, Part A schoolwide campus would like to install a Smart TV to enhance the music and art program. Is this allowable if they include it in the CIP?

A4: The LEA would need to ensure that they are following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA would specifically need to be able to document how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Additionally, the use of funds would need to have been identified in the comprehensive needs assessment and included in the campus improvement plan.

Q5: Would it be an allowable expense to pay for the educational aid certificate for the parent liaison?

A5: Paying for the costs associated with a paraprofessional meeting highly qualified requirements is allowable under Title I, Part A as long as the LEA meets the Title I, Part A Use of Funds requirements as noted on the [Title I, Part A Use of Funds document](#).

Q6: Is it allowable under Title I, Part A to purchase face coverings, gloves, hand sanitizer, zip-lock bags, and other health and safety-related items for students to use?

A6: Costs associated with the purchasing of face coverings, gloves, hand sanitizer, zip-lock bags, and other health and safety-related items directly related to and necessary to carry out the objectives of the grant are allowable under Title I, Part A, as long as the LEA meets the requirements noted on the [Title I, Part A Use of Funds document](#).

Although these items could possibly be an allowable expense, as described above, there might be better options: such as using Title IV, Part A funds or school safety funds.

Q7: Can we purchase face coverings for homeless students? Is there an exception to use the Title I, Part A set-aside funds for the homeless?

A7: The LEA can use the Title I, Part A funds reserved at the LEA level for services to Homeless students to purchase face coverings for homeless students as long as the need is identified in the comprehensive needs assessment and all other steps and requirements are followed as per the [Title I, Part A Use of Funds document](#).

Q8: Is it allowable to spend 2019-2020 Title 1 funds on computer software/programs/licenses to be used for this upcoming school year (2020-2021)?

A8: Since the end date of the 2019-2020 ESSA Federal Consolidated Grant was extended to September 30, 2021, costs associated with software programs/licenses used to support students in 2020-2021 from 2019-2020 Title I, Part A funds are allowable under Title I, Part A as long as the LEA meets the requirements noted on the [Title I, Part A Use of Funds document](#). The use of funds would need to have been identified as a need in the 2020-2021 comprehensive needs assessment and noted in the 2020-2021 campus improvement plan.

If all the students will be attending Title I, Part A schoolwide campuses, it shouldn't be an issue. On a targeted assistance campus, services should only be provided to students identified as most in need to receive the Title I, Part A services.

Additional information related to the extension of the 2019-2020 ESSA Federal Consolidated Grant can be found in the [News Bulletin sent out on June 26, 2020](#).

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August 2020

Questions and responses in this FAQ document are organized by the following topic areas for August 2020:

- [Campus Improvement Plan \(CIP\)/District Improvement Plan \(DIP\)](#)
- [Community Eligibility Provision \(CEP\)](#)
- [Parents’ Right to Know Letter Requirements](#)
- [Schoolwide Campus Transition Process – Name Change](#)
- [Targeted Assistance Campus Flexibility](#)
- [Use of Funds](#)

Campus Improvement Plan (CIP)/District Improvement Plan (DIP)/Needs Assessment

Q1: Is there a current timeline document or chart that shows when CIPs/DIPs are due for campuses/districts? And a deadline for when they should be posted to their website for 20-21?

A1: For purposes of the Title I, Part A program, the improvement plans should be completed prior to the certification and submission of the ESSA Consolidated Federal Grant Application. For purposes of the Title I, Part A program, improvement plans are not “due” to TEA. However, in the case of an audit or random validation monitoring, LEAs may be requested to submit their plans. For Title I, Part A purposes, it would be a local decision as to when and whether the improvement plans would be posted to their website. Best practice would be that the improvement plans be posted on the LEA/campus websites and made widely available to stakeholders at the beginning of the school year.

Please note that there are also State requirements related to District and Campus Improvement Plans. For information related to the plan requirements for the State Compensatory Education program, please visit the [TEA State Compensatory Education web page](#).

Community Eligibility Provision (CEP)

Q1: Where can we find information related to PEIMS reporting for Economic-Disadvantage if we are an LEA participating in the CEP Program?

A1: The guidance that is published in the 2020-2021 Texas Education Data Standards (TEDS) can be found by accessing this link:
<https://tealprod.tea.state.tx.us/TWEDS/85/379/0/0/DataComponents/ComplexType/List/8262>.

2020-2021 Texas Education Data Standards (TEDS) Section DR40

ECONOMIC-DISADVANTAGE-CODE (E0785) indicates the student's economic disadvantage status.

Overview of Community Eligibility Provision (CEP)

- Review enrolled students against all direct certification lists for free or reduced-price lunch eligibility.
- Distribute a locally developed income survey form to each student that is not on a direct certification list at the beginning of the school year and each student that enrolls during the school year.

Although the CEP program allows all students enrolled on a CEP campus to receive free meals, students must be reported with the economic disadvantage code for which they actually qualify based upon the direct certification lists and the locally developed income survey form.

Parents' Right to Know Letter Requirements

Q1: When should the Parent Right To Know letters be sent out for any teacher teaching outside of their certification area?

A1: Campuses must provide to each individual parent timely notice that the parent's child has been assigned or taught for four or more consecutive weeks by a teacher who does not meet state certification or licensure requirements soon after the four weeks have passed. Sample Notification Letters can be found on the [Statewide Parent and Family Engagement Initiative Web Site for Parents' Right to Know](#). Additionally, another resource that you may find helpful is [An Administrator's Checklist to ESSA Parent and Family Engagement](#). It provides a comprehensive list of all the parental involvement requirements.

Q2: We have a teacher (teaching a core subject on a Title I campus) that is working through an ACP program but does not have an intern or probationary certification. After how many weeks, do we have to provide notification to parents of their children being taught by a non-certified teacher?

A2: ESSA Section 1112(e)(1)(B)(ii) states that schools that receive Title I, Part A funds shall provide to each individual parent of a child who is a student in such school with respect to such student, timely notice that the student has been assigned, or has been taught for 4 or more consecutive weeks by, a teacher who does not meet applicable State certification or licensure requirements at the grade level and subject area in which the teacher has been assigned.

To determine if a teacher meets State certification requirements based on the information provided by the LEA (teacher that is working through an ACP program but does not have an intern or probationary certification and he/she is teaching a core subject), please reach out to the Division of Educator Certification. They are available only via [helpdesk ticket](#). If it is determined

that the teacher in this circumstance does not meet State certification requirements, then the notification requirement referenced above would need to be met.

Schoolwide Campus Transition Process – Name Change

Q1: The Board of Trustees approved a name change for an elementary school. They kept the same campus number. The only thing that changed was the name. Does the campus have to go through a schoolwide program transition process?

A1: Since the name of the campus is the only thing that changed, they would not be required to go through a schoolwide program transition process.

Targeted Assistance Campus Flexibility

Q1: There has been some flexibility granted across federal programs given our current circumstances. Does any flexibility apply to Title I, Part A Targeted Assistance campuses in allowing materials purchased with Title I, Part A funds to be used for entire classrooms rather than the targeted student population that qualify based on pre-determined criteria?

A1: There has not been any flexibility applied to Title I, Part A Targeted Assistance campuses in allowing materials purchased with Title I, Part A funds to be used for entire classrooms rather than the targeted student population that qualify based on pre-determined criteria.

Use of Funds

Q1: The LEA is wanting to use Title I, Part A funds to contract with the Education Service Center (ESC) for Effective Schools Framework (ESF) support. Is this allowable if they have addressed it in their CNA and CIP?

A1: Professional and contracted services necessary to carry out the intent and purpose of Title I, Part A would be an allowable use of Title I, Part A funds as long as the steps and requirements noted in the [Title I, Part A Use of Funds document](#) are met. The LEA would need to document how the support received by the ESC for the Effective Schools Framework meets the intent and purpose of the Title I, Part A program. Additionally, the campus/es benefitting from the services would have to be Schoolwide Program campuses.

Q2/Q3/Q4 Scenario: We have 2 district Home/School Liaisons who are paid on a 187-day contract out of our ESSA fund allocation. Throughout the school year, they are also reimbursed for mileage when using their personal vehicles to address student/family needs. Recently, they submitted mileage reimbursement forms for days that they were not officially on contract indicating that they were still working to address student needs throughout the summer.

Q2: Can they be reimbursed for activities when they were not officially on contract from federal funds?

- A2:** If the employees were not authorized to be paid extra-duty pay outside of the contract, the district is not obligated to pay for extra-duty pay and/or mileage. However, if the district determines that services were allowable and allocable to the grant and wants to pay for mileage, the reimbursements must be supported by documentation that at a minimum should include an actual mileage log for each trip contemporaneously maintained by the claimant, list of services provided during the trip, dates of services, locations where services were provided and the list of participants who received services on each trip and in accordance with the district's policies and procedures regarding mileage reimbursement. Generally, such mileage reimbursement is considered reasonable and necessary when the employee is performing their duties that meet the intent and purpose of the Title I, Part A program considering that all the [steps and requirements for use of Title I, Part A funds](#) are met (including that it is based on an identified needs in the comprehensive needs assessment; and documented in the campus improvement plan).
- Q3:** In order to justify that expense, should we also request timesheets and pay them extra-duty to pay for the services performed using their personal vehicle?
- A3:** If the employees were not authorized to be paid extra-duty pay outside of the contract, the district is not obligated to pay for extra-duty pay and/or mileage. However, if the district determines that services were allowable and allocable to the grant and wants to pay extra-duty pay, it must be supported by documentation and in accordance with the district's policies and procedures regarding extra-duty pay. Generally, such extra-duty pay is considered reasonable and necessary when the employee is performing their duties that meet the intent and purpose of the Title I, Part A program considering that all the [steps and requirements for use of Title I, Part A funds](#) are met (including that it is based on an identified needs in the comprehensive needs assessment; and documented in the campus improvement plan).
- Q4:** What documentation would/should be required to comply with regulations.
- A4:** The LEA would need to maintain the following documentation locally: payroll, extra-duty pay, an actual mileage log for each trip contemporaneously maintained by the claimant, list of services provided during the trip, dates of services, locations where services were provided and the list of participants who received services on each trip in accordance with the district's policies and procedures regarding mileage reimbursement and [Title I, Part A Use of Funds](#) (including that it meets the intent and purpose of Title I, Part A; is based on an identified needs in the comprehensive needs assessment; and documented in the campus improvement plan) documentation.

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September 2020

Questions and responses in this FAQ document are organized by the following topic areas for September 2020:

- [Campus Improvement Plan \(CIP\)](#)
- [ESSA Consolidated Application - SC5000 Schedule](#)
- [LEA Title I, Part A Compliance Report \(PR1000\)](#)
- [Parents' Right to Know Requirements](#)
- [Procurement](#)
- [Schoolwide Campus Transition Process](#)
- [Time and Effort Documentation - Stipends](#)
- [Use of Funds](#)
- [Virtual Meetings – Annual Title I, Part A Meeting Requirement](#)

Campus Improvement Plan (CIP)

Q1: Are LEAs required to translate their CIP?

A1: LEAs are required to make their CIP available to parents and the public in an understandable and uniform format, and to the extent practicable, provided in a language that the parents can understand. For audit and/or random validation purposes, if the LEA is not going to provide the document in a language that the parents can understand, the LEA would need to document why they did not translate the document and how the parents were able to obtain the information (i.e. oral translation).

The statutory language related to your question reads as follows.

ESSA Section 1114

(b) SCHOOLWIDE PROGRAM PLAN.—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—

(4) is available to the local educational agency, parents, and the public, and the information contained in such plan shall be in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand;

ESSA Consolidated Application – SC5000 Schedule

Q1: Do campuses identified as “skipped” on the SC5000 need to have a CIP in place?

- A1: Since “skipped” campuses will not be receiving Title I, Part A funding to implement a Title I, Part A program, they are not obligated to meet the program requirements associated with receiving Title I, Part A funding, such as the Campus Improvement Plan. Please note that although the “skipped” campus is not required to have a CIP in place to meet the Title I, Part A requirements, Texas Education Code Section 11.253(c) requires the following, “Each school year, the principal of each school campus, with the assistance of the campus-level committee, shall develop, review, and revise the campus improvement plan for the purpose of improving student performance for all student populations, including students in special education programs under Subchapter A, Chapter 29, with respect to the student achievement indicators adopted under Section 39.053 and any other appropriate performance measures for special needs populations.”

As per the [Schedule SC5000 Title I, Part A Campus Selection Guidance](#) (Page 9), the LEA confirms by submission of its application that “skipped” campuses meet the following requirements: 1) The skipped campus meets the comparability of services requirement; 2) The skipped campus receives supplemental funds from other State or local sources that are expended per the requirements of a TA or a SW campus; and 3) The funds expended from such other sources equal or exceed the amount that would be provided on the campus under Title I, Part A. Additionally, if the LEA chooses to “skip” a campus, the LEA must provide the eligible private school children who reside within the boundaries of the “skipped” campus’s attendance area the opportunity to receive Title I, Part A services.

LEA Title I, Part A Compliance Report (PR1000)

- Q1: My LEA has always presented the ESSA Consolidated Compliance Report submitted to TEA at the Annual Title I, Part A Meeting. Is it required to be presented or provided to the public?**

- A1: It is not a statutory requirement that the ESSA Compliance Report for Title I, Part A be shared at the Annual Title I, Part A Meeting nor provided to the public. The report is subject to the Public Information Act and could be requested by the public through that avenue.

Please note that there may be information that is reported in the report that may be of interest and/or require consultation. For example, LEA Reservation Amounts are reported. The reservation of funds by an LEA will reduce the amount of funds available for distribution to participating campuses; therefore, the LEA must determine what reservations are needed in consultation with teachers, pupil services personnel (where appropriate), principals, parents of children receiving services, and private school officials before any decisions are made by the LEA.

For a list of the statutory requirements associated with the Annual Title I, Part A Meeting, take a look at the recently updated [Title I, Part A Annual Meeting Toolkit](#).

Parents’ Right to Know Requirements

- Q1: Are LEAs required to send the Parents’ Right to Know notification for teachers who are currently in an Alternative Certification Program (ACP)?**

A1: ESSA requires that campuses provide to each individual parent timely notice that the parent's child has been assigned or taught for four or more consecutive weeks by a teacher who does not meet state certification or licensure requirements soon after the four weeks have passed. Sample Notification Letters can be found on the [Statewide Parent and Family Engagement Initiative Web Site for Parents' Right to Know](#). Additionally, another resource that you may find helpful is [An Administrator's Checklist to ESSA Parent and Family Engagement](#). It provides a comprehensive list of all the parental involvement requirements.

The notification is required if the teacher does not meet state certification or licensure requirements. In some cases, teachers enrolled in alternative certification programs may meet state certification requirements. However, in other cases, teachers enrolled in alternative certification programs may not meet state certification requirements. For specific questions related to state certification requirements, please reach out to the Division of Educator Certification by submitting a HelpDesk Ticket under the "Educator Certification and CPE" card on the [HelpDesk web page](#).

Procurement

Q1: May an LEA use federal funds to purchase items from large stores (i.e. Wal Mart, Target, H-E-B) if the large store is unwilling to sign a procurement form?

A1: There is no required procurement form. However, if the LEA requires that a form be signed as part of its local policy and the store is unwilling to sign the form, then the LEA cannot purchase from those stores because it would be violating its local procurement policy.

Schoolwide Campus Transition Process

Q1: We have had several LEAs that are reconfiguring their campuses to combine different grade levels to create new campuses. There are a couple of scenarios that we have seen:

- **Multiple campuses that are Schoolwide where grade levels are being reconfigured.**
- **Multiple campuses that are a mixture of Schoolwide and Eligible, but Not Served that are being reorganized**
 - **It varies, but sometimes certain grade levels go up to an Intermediate or Middle School level from an existing elementary campus; or sometimes the LEA expands an Elementary School to include grades from Intermediate or Middle Schools. We have also seen where campuses are combined and then multiple elementary schools are created.**
- **What is the best way to handle these situations? Do the "new" campuses need to go through the process to become Schoolwide?**

A1: The campuses would need to go through the process to some extent because there has been a change in the composition of the student body. However, the time that it would take for the planning process would all depend on the extent of the reorganization/reconfiguration and how the collective needs of the student body of the "new" school would be affected. If the LEA

determines, in consultation with the school, that less time was needed to develop and implement the schoolwide program based on the collective needs of the “new” student body, the LEA would need to retain documentation to that effect. All documentation to demonstrate compliance for schoolwide planning must be maintained locally for audit and validation/monitoring purposes.

Documentation of the planning process must include a comprehensive needs assessment, the inclusion of the required stakeholders in the process, incorporation of the required descriptions into the Campus Improvement plan, documentation related to parent and family engagement (PFE) requirements (i.e. school-parent compact and PFE policy), and the provision for an evaluation of program effectiveness that will inform the next year’s needs assessment and planning. If the LEA determines that Education Service Center (ESC) training/technical assistance was part of the reason that less time was needed to develop and implement the schoolwide program, then the LEA would need to keep such documentation in addition to the documentation noted above.

Q2: We have also had questions about how the Education Service Center (ESC) is supposed to support those campuses who are going through the process of transitioning to Schoolwide. What are the recommended steps, trainings, etc. that we need to do in support of the LEA?

A2: The recommended steps and training would center around the comprehensive needs assessment, the inclusion of the required stakeholders in the process, incorporation of the required descriptions into the Campus Improvement plan, documentation related to parent and family engagement (PFE) requirements (i.e. school-parent compact and PFE policy), and the provision for an evaluation of program effectiveness that will inform the next year’s needs assessment and planning.

Time and Effort Documentation – Stipends

Q1: Our LEA is considering using Title I funds to pay a stipend to a principal to be the Title I coordinator. Does time and effort have to be kept in the case of a stipend?

A1: Time and effort documentation is required for any type of compensation paid with federal funds, including stipends. A stipend should be paid based on policies and procedures adopted by the board or local authorities. A good example is a board approving a policy to pay a stipend in the amount of \$1000 for all teachers with graduate degrees. There is a good chance that this position’s regular salary is paid with local funds but the stipend will be paid out of federal funds.

The principal must maintain time and effort documentation that describes a policy/reason adopted by the appropriate authority or the board supporting the stipend for such activities. The document must be signed and dated by the supervisor authorizing the stipend.

If the principal was paid for extra duty pay outside of the normal working hours, the time and effort documentation would include a time sheet of extra duties performed and a supplemental pay agreement approved by the supervisor for provided specific services eligible under the federal program.

Either way, the time and effort documentation is required.

Use of Funds

Q1: Is it allowable to leverage Title I, Part A funds to pay for District Coordinator for School Improvement (DCSI) support services provided by an Education Service Center (ESC) for campuses with an “F” rating identified in need of intervention by the state? Since the services provided are state required, would this use of funds be considered a supplant?

A1: Professional and contracted services necessary to carry out the intent and purpose of Title I, Part A would be an allowable use of Title I, Part A funds as long as the steps and requirements noted in the [Title I, Part A Use of Funds document](#) are met. The LEA would need to document how the support received by the ESC for the DCSI services meets the intent and purpose of the Title I, Part A program. Additionally, the campus/es benefitting from the services would have to be Title I, Part A Schoolwide Program campus/es.

Since the inception of ESSA, the Supplement, Not Supplant requirements for Title I, Part A changed. For Title I, Part A, LEAs are no longer required to adhere to the traditional presumptions of supplant (of which one traditional presumption included state requirements). The requirement related to Supplement, Not Supplant for Title I, Part A is that the LEA must have a valid Supplement, Not Supplant Methodology or a Statement of Exemption in place. For more information related to the methodology or statement of exemption, [click here to access the most current version of the Supplement, Not Supplant Handbook](#).

Please note that the traditional presumptions of supplant are still in place for other federal programs (i.e. including, but not limited to Title II, Part A and Title IV, Part A). For a complete list of federal programs that still take into account the traditional presumptions of supplant, [click here to access the most current version of the Supplement, Not Supplant Handbook](#).

Q2: Is it allowable to use Title I, Part A funds to pay for the salary (100%) of the District Coordinator for School Improvement (DCSI)?

A2: If the LEA meets all the [Title I, Part A use of funds requirements](#) (including documenting an identified need as a result of a comprehensive needs assessment and documenting the activity in the campus improvement plan), it would be considered allowable to pay the salary of the DCSI, taking into consideration the following guidance. For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on activities that meet the intent and purpose of the Title I, Part A program. It would also be advisable to note the Title I, Part A duties in the job description for audit and/or random validation purposes. However, if the LEA has any non-schoolwide campuses, this is a difficult thing to justify because school improvement is to the benefit of all the LEA’s students.

The LEA should also consider that the time spent on program administration activities would be considered activities to be conducted with LEA reserved funds. If the employee is providing LEA-

specific Title I, Part A responsibilities, the time the employee spends on such responsibilities would be considered district reservation time. If the employee is providing campus-specific Title I, Part A responsibilities, the time the employee spends on such responsibilities would be considered at the campus level. Additionally, the LEA would need to ensure that it is following LEA policies and procedures related to the classification of employees (LEA vs. campus). The LEA would need to maintain detailed documentation in case of an audit or random validation monitoring review.

Q3: Is it allowable to use Title I, Part A funds to pay for the salary of an aide to assist a school nurse with assessing student illness to prevent students from having to lose instructional time from waiting on the nurse?

A3: It would be difficult to justify and maintain documentation demonstrating how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

Q4: Is it allowable to use Title I, Part A funds to pay a receptionist to transfer phone calls to teachers after regular school hours?

A4: It would be difficult to justify and maintain documentation demonstrating how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

Q5: Our LEA would like to host SAT college entrance exam camps throughout the year. We have local funds to host the first three camps. However, is it allowable to use Title I, Part A funds for an additional boot camp or would this be considered supplanting?

A5: If the campuses are schoolwide campuses, this would not be a problem, as long as the LEA has a valid Supplement, Not Supplant Methodology or a Statement of Exemption in place. If one or more of the campuses are Targeted Assistance, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If one or more of the campuses is a non-Title I campus, this would not be an allowable use of funds for those campuses. Please refer to the [Title I, Part A Use of Funds document](#) as well which includes the requirements of having this activity as an identified need in the comprehensive needs assessment and documented in the campus improvement plan.

Virtual Meetings – Annual Title I, Part A Meeting Requirement

- Q1:** Is it acceptable for campuses to host their Annual Title I Meeting in a virtual/remote setting?
- A1:** Yes, it is acceptable for LEAs to host their Annual Title I, Part A Meeting in a virtual/remote setting. Documentation is key. The LEA would need to document how all the requirements associated with the Annual Title I meeting were met (i.e. attendance, offered to all parents, translation, information provided, opportunity for feedback, etc). Additionally, the LEA would need to consider alternative options to share the information from the meeting with parents that may not be able to attend the meeting being held in a remote setting. The updated [Annual Title I, Part A Annual Meeting Toolkit](#) has resources related to the Annual Title I, Part A Annual Meeting requirement and a section with suggestions for hosting the meeting in a virtual setting.

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October 2020

Questions and responses in this FAQ document are organized by the following topic areas for October 2020:

- [Campus Improvement Plan \(CIP\) Stakeholders](#)
- [Comprehensive Needs Assessment \(CNA\) Process Stakeholders](#)
- [LEA Reservations](#)
- [Sign-In Sheets](#)

Campus Improvement Plan (CIP) Stakeholders

Q1: The ESSA Statute [Section 1114(b)(2)] references the following stakeholders that are required to be involved in the development of the Campus Improvement Plan: 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. When it references including students when the plan relates to a secondary school, is secondary school defined as a high school only?

A1: A secondary school would include high school and middle school/junior high school campuses.

Comprehensive Needs Assessment (CNA) Process Stakeholders

Q1: Who is required to be on the campus-level CNA committee?

A1: For Title I, Part A purposes, the ESSA Statute provides a list of required stakeholders for the development of the Campus Improvement Plan (CIP). It would be best practice to include the same stakeholders that are required for the CIP in the CNA process to ensure that they are knowledgeable of the CNA results in their work to connect the CNA to the CIP. See additional information below on the importance of engaging a variety of stakeholders in the process.

A schoolwide campus should include a description of the campus's CNA process in the CNA or CIP. The description should include the date(s) that the CNA was developed (if a new campus) or the date(s) that the CNA was reviewed and revised for the current school year, list of stakeholders involved that includes the individuals by name and roles, areas examined, and list of multiple data sources analyzed. In the event that an LEA is selected for random validation, the LEA would need

to submit documentation to show that the stakeholders listed in the description were involved in the CNA process.

The [Needs Assessment Guidebook](#), a resource that provides information as it relates to stakeholders involved in the CNA process, includes the following “A needs assessment is a process that should be undertaken with (or by) local stakeholders rather than completed entirely by a small group of leaders or an outside entity. Engaging school staff, parents, a diverse assortment of leaders and external support providers (even students, at the secondary level) during each phase of the needs assessment—not just in the delivery of results—ensures that the planning, data collection, identified needs, and consideration of underlying causes incorporate the input of a broad knowledge base, including diverse local perspectives.

The benefit of a needs assessment conducted with collaboratively engaged stakeholders is seen long after the needs assessment is complete. By developing trust in and through the process, participating stakeholders are more likely to be invested in the outcomes and actively engaged in the selection, development, and implementation of improvement plans and strategies that create lasting change. In addition, active participation increases the overall capacity of the group to sustain implementation and improvement efforts. Relational trust is a critical factor for implementing lasting changes in education settings, and active stakeholder engagement can help to build that trust (Bryk & Schneider, 2002; Louis, Leithwood, Wahlstrom, & Anderson, 2010; Tschannen-Moran & Hoy, 2001).”

LEA Reservations

Q1: Is there a correlation between the 1% LEA reservation for Parent and Family Engagement (PFE) and the reservation for services to homeless students?

A1: Regardless of whether the LEA is a Single Attendance Area or a Multiple Attendance Area, the LEA shall reserve from the LEA’s entitlement such Title I, Part A funds as are reasonable and necessary, prior to making allocations to eligible campuses, in order to accomplish the following purposes:

Districtwide Parent and Family Engagement Activities [Note: If the LEA’s Title I, Part A entitlement is greater than \$500,000, the LEA is required to reserve at least 1 percent of its Title I, Part A entitlement to assist schools to carry out parent and family engagement activities. At least 90 percent of the funds reserved shall be distributed to Title I, Part A schools, with priority given to high-need schools.]

Services to Homeless Students [Note: The Homeless reservation is required by all LEAs, regardless of the Title I status of their campuses. Although an amount must be reserved for this purpose, there is no specific amount or percentage required. It is what the LEA deems to be reasonable and necessary. The LEA should maintain documentation to demonstrate how the LEA decided on the amount reserved.]

Q2: Are the reservations for PFE and services to homeless students related in any way?

A2: The two reservations are not necessarily related in any way. LEAs would make a determination as to which line item they would make an LEA reservation under and maintain documentation locally to justify the determination. The LEA would need to abide by the reserved funds amounts noted on Program Schedule 3101 – Title I, Part A of the ESSA Consolidated Federal Grant Application for each of the activities areas to be conducted with reserved funds. If the LEA determines that the needs of the LEA have changed, an amendment can be submitted to adjust the amounts noted. The LEA should maintain documentation to demonstrate how the LEA decided on the amount reserved.

Q3: Can funds reserved for PFE be used to support services to homeless students and vice versa?

A3: It depends. Funds reserved at the LEA level can be used for Districtwide PFE activities and MV/homeless students. There are some instances where the LEA can document that funds reserved for Districtwide PFE activities may be used to support homeless students and vice versa. It is what the LEA deems to be reasonable and necessary. The LEA would need to abide by the reserved amounts noted on Program Schedule 3101 – Title I, Part A of the ESSA Consolidated Federal Grant Application for each of the activities areas to be conducted with reserved funds. If the LEA determines that the needs of the LEA have changed, an amendment can be submitted to adjust the amounts noted. The LEA should maintain documentation to demonstrate how the LEA decided on the amount reserved.

Sign-In Sheets

Q1: What are acceptable forms of documentation for sign-in sheets?

A1: Given the increased use of virtual meeting environments during the 2019-2020 and 2020-2021 school years, participant rosters that include the meeting title, meeting date, and stakeholder names and roles would be acceptable substitutes for the more traditional sign-in sheets. This eliminates the need of a participant signature.

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November 2020 – January 2021

Questions and responses in this FAQ document are organized by the following topic areas from November 2020 – January 2021:

- [Campus Improvement Plan Stakeholders](#)
- [Federal Report Card Dissemination](#)
- [Title I, Part A Paraprofessional Requirements](#)
- [Use of Funds](#)

Campus Improvement Plan Stakeholders

Q1: To what degree are students required to be involved in the development of the Campus Improvement Plan (CIP) on a secondary school campus?

A1: Section 1114 of the ESSA statute provides a list of required stakeholders for the development of the Schoolwide Program Plan - Campus Improvement Plan (CIP). The statute states that if the plan relates to a secondary school, that students should be involved, if appropriate. The campus can determine what is appropriate.

If the campus does not feel that it is appropriate for the students to sit through the very intense or in-depth conversations, then they would not need to have students be involved for those conversations. The requirement for stakeholder involvement could vary based on what may be the most appropriate way to involve a particular group of stakeholders. For example, a campus may determine that the most appropriate way to involve students in the development of the CIP would be to seek input and feedback on the specific activities that directly affect students. This can be documented in a variety of ways which includes, but is not limited to, having a meeting that only includes students, conducting a student survey, or discussion of the item(s) at a Campus Committee meeting and then excusing the students. The key is for the campus to maintain documentation locally that shows evidence of their involvement.

Federal Report Card Dissemination

Q1: Is an LEA required to post federal report cards for all campuses regardless of whether they receive Title I, Part A funds? If they must post for all campuses, are they required to notify parents at all campuses?

A1: Each LEA that receives Title I, Part A funding is responsible for disseminating the state, LEA and campus-level federal report cards for all campuses, regardless of whether they are Title I served. The LEA does need to notify the parents of enrolled students at all campuses.

Title I, Part A Paraprofessional Requirements

Q1: When should an LEA document compliance with the requirements?

A1: For audit and/or random validation purposes, we would advise your LEA to complete the forms for current-year instructional paraprofessionals that are funded by Title I, Part A funds.

Q2: Are LEAs required to report the number of paraprofessionals who meet the requirements?

A2: There is currently no annual ESSA report associated with the Title I, Part A Paraprofessional requirements.

Q3: If we have a paraprofessional that completed a similar paraprofessional assessment 10 years ago while in California, would it count and exempt her from taking another assessment to meet the requirements?

A3: Your LEA can accept the results of the assessment if you are able to document that the employee met a rigorous standard of quality and demonstrated through a local academic assessment: Knowledge of and the ability to assist in instructing reading, writing, and mathematics; or knowledge of and the ability to assist in instructing reading readiness, writing readiness, and mathematics readiness, as appropriate. You would need official assessment documentation that includes the name of the assessment, date of assessment, assessment score, and passing standard.

Q4: Is the local assessment to be developed within the district, or is there a certified assessment through the local ESC?

A4: The assessment can be developed by the LEA, as long as the LEA is able to document the following:

- The assessment assesses knowledge of and the ability to assist in instructing reading, writing, and mathematics; or knowledge of and the ability to assist in instructing reading readiness, writing readiness, and mathematics readiness, as appropriate.
- The passing standard of the assessment demonstrates that the individual met a rigorous standard of quality.

The LEA can utilize external assessment providers for an assessment, including your regional Education Service Center.

Q5: What changed in the requirements from the transition of NCLB to ESSA?

A5: The only changes from what was expected under NCLB vs. ESSA are as follows.

1. The Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA), requires that LEAs ensure that paraprofessionals performing instructional duties **whose salaries are paid in full or in part from Title I, Part A funds** on a Schoolwide or Targeted Assistance campus, meet the Title I, Part A Paraprofessional requirements.

2. Additionally, within one year of being hired, Title I, Part A paraprofessionals must have the Educational Aide state certification. *Note: Charter school personnel are exempt from the state certification requirement unless it is required by local policies and procedures.*

For more information related to the Educational Aide state certification, visit the [Becoming an Educational Aide in Texas web page](#).

Q6: What is the timeframe for the paraprofessionals to complete their requirements?

A6: Prior to providing services, Title I, Part A paraprofessionals must have a high school diploma or its recognized equivalent and meet one of the following requirements:

1. Complete at least two years of study at an institution of higher education (defined as completion of 48 semester hours or equivalent trimester hours) of college coursework or an applicable number of semester hours as defined by the institution of higher education attended, whichever is less;
2. Possess an associate (or higher) degree; or
3. Meet a rigorous standard of quality and can demonstrate, through a local academic assessment—
 - Knowledge of and the ability to assist in instructing reading, writing, and mathematics; or
 - Knowledge of and the ability to assist in instructing reading readiness, writing readiness, and mathematics readiness, as appropriate.

Additionally, within one year of being hired, Title I, Part A paraprofessionals must have the Educational Aide state certification. For more information related to the Educational Aide state certification, visit the [Becoming an Educational Aide in Texas web page](#).

Q7: What is a rigorous local academic assessment?

A7: The rigorous standard of quality would be determined by the assessment provider (LEA, ESC, external vendor).

Use of Funds

Q1: Is it allowable to use Title I, Part A funds to repair Chromebooks purchased with local funds?

A1: If the LEA has a valid SNS methodology or Statement of Exemption, the use of Title I, Part A funds to pay for the repairs would be an allowable use of funds, as long as the student device repairs are for students being served by the Title I, Part A program. As with the use of any Title I, Part A funds, the campus would need to ensure that the LEA is able to document how the activity meets the intent and purpose of the Title I, Part A program which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. The LEA will also need to ensure that the activity is identified as a need, noted

in the CIP, and that the use of funds steps and requirements are followed as per the [Title I, Part A Use of Funds document](#).

The campus would also need to ensure that it is following the LEA's local policies and procedures as they relate to the EDGAR requirements.

Q2: Is it allowable to use Title I, Part A funds to pay for costs associated with the state-required Reading Academies?

A2: If the LEA has a valid SNS methodology or Statement of Exemption, the use of Title I, Part A funds to pay for the state required Reading Academies would be an allowable use of funds. Professional development is an allowable use of funds under Title I, Part A as long as it is being provided for schoolwide program/targeted assistance program teachers and the use of funds steps and requirements are followed as per the [Title I, Part A Use of Funds document](#).

Since the inception of ESSA, the method of determining compliance with the Supplement, Not Supplant requirements for Title I, Part A changed. For Title I, Part A, LEAs are no longer required to adhere to the traditional presumptions of supplant (of which one traditional presumption included state requirements). The requirement related to Supplement, Not Supplant for Title I, Part A is that the LEA must have a valid Supplement, Not Supplant Methodology or a Statement of Exemption in place. For more information related to the methodology or statement of exemption, [click here to access the most current version of the Supplement, Not Supplant Handbook](#).

Please note that the traditional presumptions of supplant are still in place for other federal programs (i.e. including but not limited to Title II, Part A and Title IV, Part A). For a complete list of federal programs that still take into account the traditional presumptions of supplant, [click here to access the most current version of the Supplement, Not Supplant Handbook](#).

Q3: Is it allowable to use Title I, Part A funds to purchase laptops that will be utilized to provide tutoring and instructional services for homeless students?

A3: It is an allowable use of Title I, Part A funds reserved at the LEA level for Services to Homeless Students to purchase laptops that will be utilized to provide tutoring and instructional services for homeless students. As with any use of Title I, Part A funds, the LEA would need to follow the steps and requirements noted in the [Title I, Part A Use of Funds document](#).

Q4: Is it allowable for an LEA to use Title I, Part A funds for oral or written translation services?

A4: It is allowable for an LEA to use Title I, Part A funds for oral or written translation services on Title I, Part A campuses if they meet the steps and requirements noted in the [Title I, Part A Use of Funds document](#).

Q5: Is it allowable to use Title I, Part A funds to purchase student meals during intersession?

A5: Title I is intended to address the academic needs of children who are not meeting, or most at-risk of not meeting, challenging State academic standards. Generally, given this purpose, Title I funds are used for instructional strategies that are designed to improve the academic achievement of low-achieving students, not for meals.

Having said this, however, the statute recognizes that students may have needs, such as hunger, that prevent them from being able to take full advantage of the educational program they are offered. Accordingly, section 1115(e)(2) authorizes a local educational agency (LEA) to use a portion of its Title I funds, as a last resort, to provide health, nutrition, and other social services not otherwise available to Title I participating students if the school, if appropriate, has engaged in a comprehensive needs assessment and established a collaborative partnership with local service providers and funds are not reasonably available from other public or private sources to provide such services. Thus, an LEA may use Title I funds to provide breakfast or lunch to those Title I students that it identifies as needing the meal, provided that this service is reasonable and necessary to the success of a school's Title I program; the activity is consistent with the school's comprehensive assessment of the academic needs of the Title I children served; and funds for this service are not otherwise available from other public or private sources for those purposes.

In these limited instances, an LEA would have to demonstrate that it has exhausted all other sources of funding before it pays for nutrition services with Title I funds. This might include, for example, checking whether any programs administered by the U.S. Department of Agriculture can meet the needs of these students. If the LEA ultimately cannot identify another source of funding for breakfast or lunch for those Title I students in need of this service, then under section 1115(e)(2) it may use some of its Title I funds to address the need.

Q6: Is it allowable to use Title I, Part A funds to pay an ESL teacher who works with students on language building skills?

A6: The LEA would need to ensure that it is following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA needs to be able to document how the activity meets the intent and purpose of the Title I, Part A program which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. The use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan. Additionally, the services could only be provided for students attending schoolwide campuses as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If a campus is a Targeted Assistance campus, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If the students attend non-Title I campuses, this would not be an allowable use of Title I, Part A funds for those campuses.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on Title I, Part A activities. It would also be advisable to note the Title I, Part A duties in the job description for audit and/or random validation purposes.

Q7: Is it allowable to use Title I, Part A funds to purchase teacher desktop computers?

A7: Desktop computers for teacher use (instruction) at a schoolwide campus is an allowable use of Title I, Part A funds, as long as the LEA follows the steps and requirements as per the [Title I, Part A](#)

[Use of Funds document](#). The LEA needs to be able to document how the activity meets the intent and purpose of the Title I, Part A program, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. The use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan.

Q8: Is it allowable to use Title I, Part A funds for extra-duty pay for instructional coaches training teachers on non-duty days?

A8: Professional development is an allowable use of funds under Title I, Part A, as long as it is being provided for Title I, Part A teachers **on a Title I, Part A Schoolwide program campus or teachers providing services to Title I, Part A students on a Targeted Assistance program campus** and the use of funds steps and requirements are followed as per the [Title I, Part A Use of Funds document](#). The LEA needs to be able to document how the activity meets the intent and purpose of the Title I, Part A program which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. The LEA would also need to ensure it is compliant with the Supplement, Not Supplant (SNS) requirements associated with Title I, Part A. For Title I, Part A, the LEA would meet the SNS requirement by having a valid SNS methodology or Statement of Exemption.

Response
updated on
07/30/2021
Text added

As far as the method used to pay for the services, the LEA would need to follow its local policies and procedures related to employee compensation in determining how to compensate the employee for providing professional development services outside of their normal contract duty days. Extra-duty pay must be supported by documentation and in accordance with the LEA's policies and procedures regarding extra-duty pay.

Q9: Is it allowable to use Title I, Part A funds to pay the salary for a Communities in Schools (CIS) position?

A9: The LEA would need to ensure that it is following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA would specifically need to be able to document that this use of funds meets the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. The use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan.

Additionally, the CIS services could only be provided for students attending schoolwide campuses as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If a campus is a Targeted Assistance campus, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If the students attend non-Title I campuses, this would not be an allowable use of Title I, Part A funds for those campuses.

Q10: Is it allowable to use Title I, Part A funds for contracted services to provide technical assistance and support related to Title I Comparability requirements?

A10: If your LEA meets all the Title I, Part A use of funds requirements as noted on the [Title I, Part A Use of Funds document](#), it would be considered allowable to pay a consultant to assist in duties

associated with program administration activities (Title I Comparability) taking into consideration the following guidance.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that supports the funds being charged to Title I, Part A are related to time spent working directly on Title I, Part A program administration activities and to meet the intent and purpose of the Title I, Part A program which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. The work conducted by the consultant would be considered program administration activities which would need to be conducted with funds reserved at the LEA level. The LEA would also need to ensure that it is in compliance with the procurement threshold (2CFR 200.320) and obligation of funds (34CFR 76.707) requirements noted in EDGAR.

Q11: Is it allowable to use Title I, Part A funds to pay a stipend or extra-duty pay to a counselor to mentor other counselors?

A11: If the LEA meets all the steps and requirements noted in the [Title I, Part A Use of Funds document](#) (including documenting an identified need as a result of a comprehensive needs assessment and documenting the activity in the campus improvement plan), it would be considered allowable to pay stipends/extra-duty pay, taking into consideration the following guidance and ensuring that the LEA is able to document how the activity meets the intent and purpose of the Title I, Part A program which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

If the stipend/extra-duty pay would benefit campuses identified as schoolwide program campuses, this would not be a problem, as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. It would be difficult to document this use of funds for a Targeted Assistance campus and it would not be allowable for anyone providing services to a non-Title I, Part A campus.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on activities that meet the intent and purpose of the Title I, Part A program.

Time and effort documentation is required for any type of compensation paid with federal funds, including stipends. A stipend should be paid based on policies and procedures adopted by the board or local authorities. A good example is a board approving a policy to pay a stipend in the amount of \$1000 for all teachers with graduate degrees. There is a good chance that this position's regular salary is paid with local funds but the stipend will be paid out of federal funds. The LEA must maintain time and effort documentation that describes a policy/reason adopted by the appropriate authority or the board supporting the stipend for such activities. The document must be signed and dated by the supervisor authorizing the stipend. If the employee was paid for extra-duty pay outside of the normal working hours, the time and effort documentation would include a time sheet of extra duties performed and a supplemental pay agreement approved by the supervisor for specific services provided that are eligible under the federal program.

Q12: Is it allowable to use Title I, Part A funds to fund a summer instructional program for students who will start Pre-Kindergarten for the first time in the Fall?

A12: Strategies for assisting preschool children in the transition from early childhood education programs to local elementary school programs (including providing early instruction through a summer program for students who will be enrolling in a PK program) is an allowable use of funds under Title I, Part A as long as the steps and requirements noted on the [Title I, Part A Use of Funds document](#) are followed. The LEA needs to be able to document how the activity meets the intent and purpose of the Title I, Part A program which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. The use of funds would need to have been identified as a need in the comprehensive needs assessment and noted in the campus improvement plan. If all the students will be attending Title I, Part A schoolwide campuses, it shouldn't be an issue. On a targeted assistance campus, services should only be provided to students identified as most in need to receive the Title I, Part A services.

Q13: Is it allowable to use Title I, Part A funds to purchase online tutoring services for students?

A13: If the campuses are schoolwide campuses, the use of funds for online tutoring is allowable, as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If one or more of the campuses is Targeted Assistance, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If one or more of the campuses is a non-Title I campus, this would not be an allowable use of funds for those campuses. Please refer to the [Title I, Part A Use of Funds document](#) as well. The LEA needs to be able to document how the activity meets the intent and purpose of the Title I, Part A program which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. The need for this particular use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan. The LEA would also need to ensure that it is in compliance with the procurement threshold (2CFR 200.320) and obligation of funds (34CFR 76.707) requirements noted in EDGAR.

Q14: Is it allowable to use Title I, Part A funds to pay for the actual cost of insurance for technology equipment purchased through Operation Connectivity?

A14: The actual cost of insurance for equipment purchased through Operation Connectivity may be charged as a direct cost to Title I, Part A so long as the insurance costs are not contained in any other comprehensive casualty insurance that may be held by the LEA. As with any use of Title I, Part A funds, the LEA would also need to ensure to follow the steps and requirements noted on the [Title I, Part A Use of Funds document](#).

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February 2021 – April 2021

Questions and responses are organized by the following topic areas for February – April 2021:

- [LEA Reservations](#)
- [Parent and Family Engagement Requirements](#)
- [Parents Right to Know – Teacher Certification at Charter Schools](#)
- [Title I, Part A Paraprofessional Requirements](#)
- [Use of Funds](#)

LEA Reservations

Q1: Is there a limit on the total amount reserved at the LEA level and on personnel paid out of the LEA reservation for Title I, Part A?

A1: There is not a statutory limitation on the total amount reserved at the LEA level and on personnel paid out of the LEA reservation for Title I, Part A other than that the total reserved funds cannot exceed the LEA's entitlement amount. However, if the total reservation exceeds 30% of the entitlement, TEA will contact the LEA for a justification. The LEA would need to ensure that the funds reserved are for the statutory authorized activities which include the 10 items noted below. The LEA would need to ensure that the reserved funds are documented on the most current ESSA Consolidated Federal Grant Application – PS3101 Title I, Part A Program Schedule. Please note that there are additional requirements for some of the reservations noted below related to the amount reserved for such activities: Districtwide Parent and Family Engagement Activities and Services to Homeless Students.

1. Districtwide Parent and Family Engagement Activities (If the Entitlement Amount is greater than \$500,000, an LEA must reserve at least 1% of funds for Districtwide Parent and Family Engagement Activities.)
2. Title I, Part A Services to Eligible Private School Students, Not Including Administration
3. Administration of Title I, Part A Programs for Eligible Private School Students
4. Preschool Programs
5. Administration of Title I, Part A Programs (including administration of Title I, Part A programs for students at facilities for neglected and delinquent)
6. Districtwide Professional Development Activities
7. Services to Homeless Students (The Homeless reservation is required for all LEAs. Though the reservation amount should reflect the LEA's needs, a minimum of \$100 should be reserved and documentation should be maintained to demonstrate how this amount was determined.)
8. Services to Students Residing in Local Facilities for the Neglected
9. Services to Students Residing in Local Facilities for the Delinquent
10. Foster Care Transportation

Q2: Can an LEA serve skipped campuses with the parent and family engagement (PFE) LEA reservation?

A2: LEA reservation funds for Parent and Family Engagement (PFE) can only be used to support Title I, Part A served campuses. A skipped campus is not considered a Title I, Part A served campus. Thus, it would be unallowable to serve skipped campuses with the PFE LEA reservation.

Parent and Family Engagement Requirements

Q1: Is there a deadline for the School-Parent Compact for campuses each year?

A1: Although the ESSA statute does not provide specific information related to a deadline for the school-parent compact for campuses each year, the intent of the statute as it relates to the distribution of the school-parent compact is that it be distributed at the beginning of the school year (within the first 4 to 6 weeks) annually. As referenced in ESSA Section 1116(d), the purpose of the school-parent compact is to “outline how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State’s high standards.” For additional information and resources related to the requirements associated with the school-parent compact requirement, please visit the [Title I, Part A Parent and Family Engagement Statewide Initiative School Parent Compacts web page](#).

Q2: Are the ESSA requirements for Parent and Family Engagement activities primarily the responsibility of the campuses or the LEA?

A2: ESSA references parent and family engagement-related responsibilities for both LEAs and campuses. LEAs and campuses are both required to have a written parent and family engagement (PFE) policy. The delineated responsibilities that are referenced in the ESSA requirements that are specific to LEAs and campuses for the written PFE policies. For additional information and resources related to the requirements associated with the LEA and campus written parent and family engagement policies, please visit the [Title I, Part A Parent and Family Engagement Statewide Initiative Written Parent and Family Engagement Policies web page](#).

Q3: If the LEA originally had activities in the Campus Improvement Plan (CIP) or District Improvement Plan (DIP) for parent and family engagement, is the LEA out of compliance if they choose not to do those activities or can the LEA simply change the CIP or DIP to reflect the decision to change?

A3: In general, the CIP and DIP are living documents based on the needs identified as a result of the comprehensive needs assessment process. We understand that such needs may change mid-year or as a result of an extenuating circumstance (i.e. pandemic). It is important to keep the CIP and DIP as up-to-date as possible in the case of an audit and/or random validation monitoring. Thus, LEAs can amend their CIP and DIP at any time that they are able to document that needs have changed, as long as they follow the improvement planning process requirements, which includes

the involvement of various stakeholder groups, including parents. For audit and/or random validation monitoring, it is important for LEAs and campuses to maintain all versions of the CIP and DIP with the dates the documents were updated being noted within the documents. The LEA should exercise caution when making decisions related to making changes to PFE-related activities since it is required to consult with parents and family members of participating children when such changes are to be initiated. The LEA should also verify to see if there are any implications related to the funds reserved at the LEA level for parent and family engagement activities. The activities may have also been listed in the LEA and/or campus parent and family engagement written policies and thus, revisions to the policies would need to occur, as well, in consultation with parents and family members of participating children. Statute states that the written policies shall be jointly developed with, and distributed to, parents and family members of participating children, **and agreed on by such parents**. Additionally, the LEA shall involve parents and family members of children receiving Title I, Part A funds in the decisions regarding how Title I, Part A funds reserved under Section 1116(a)(3)(A) are allotted for parental involvement activities. [Section 1116(a)(3)(B)]

Parents Right to Know – Teacher Certification at Charter Schools

Q1: Are charter schools required to comply with the requirement related to parental notification of teachers who are not certified and have been teaching for 4 or more weeks?

A1: ESSA Section 1112(e)(1)(B) states, “ADDITIONAL INFORMATION.—In addition to the information that parents may request under subparagraph (A), a school that receives funds under this part shall provide to each individual parent of a child who is a student in such school, with respect to such student—

(ii) timely notice that the student has been assigned, or has been taught for 4 or more consecutive weeks by, a **teacher who does not meet applicable State certification or licensure requirements** at the grade level and subject area in which the teacher has been assigned.”

Teachers employed by open enrollment charter schools in Texas are not required to be certified as per state certification or licensure requirements except in the case of teachers assigned to teach in special education or bilingual programs, in which case the appropriate state certification is required. Therefore, the parents right to know requirement referenced in ESSA statute (Section 1112[e][1][B][ii]) would only apply to special education and bilingual teachers employed by an open enrollment charter school.

Title I, Part A Paraprofessional Requirements

Q1: Does the [Title I, Part A Paraprofessional LEA Documentation Form](#) need to be updated yearly?

A1: If the status of the employee’s qualifications has not changed, the form would not need to be updated yearly.

Use of Funds

Q1: If an employee is retiring and they were paid out of Title I, Part A funds and the LEA has a policy to pay out any unused sick leave, can the LEA use Title I, Part A funds to pay the balance of unused sick days?

A1: The Title I, Part A use of funds referenced is to be treated like other fringe benefits under 200.431 of EDGAR, but, generally, the LEA must follow their local policy and treat federal funds the same as state and local funds in this instance. So, if the LEA's local policy pays for unused sick leave by their funding pattern, then Title I, Part A can pay its share by the funding pattern; however, if their policy is to pay all unused sick leave from local funds, then Title I, Part A can't be charged.

Q2: Is it allowable to use Title I, Part A funds to pay for professional development/training for non-core content area teachers?

A2: If the LEA has a valid SNS methodology or Statement of Exemption, the use of Title I, Part A funds to pay for professional development for teachers would be an allowable use of Title I, Part A funds as long as it is being provided for schoolwide program/targeted assistance program teachers and the use of funds steps and requirements are followed as per the [Title I, Part A Use of Funds document](#). The use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan. To pay for professional development for non-core content area teachers using Title I, Part A funds, the LEA would specifically need to be able to document that the use of funds for non-core-content instruction teachers meets the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

Q3: Can Title I, Part A funds be used for students in a non-Title I, Part A campus?

A3: Title I, Part A funds can only be used to support Title I, Part A students at Title I, Part A served campuses (with only 1 exception referenced below). If a campus, based on their campus low-income percentage, does not meet Title I, Part A eligibility requirements to operate a Schoolwide Program or Targeted Assistance Program, they are not considered a Title I, Part A campus and thus students on the campus cannot be served by Title I, Part A funds. The LEA provides TEA with the campuses served with Title I, Part A funds on the ESSA Consolidated Federal Grant Application – SC5000 Title I, Part A Campus Selection. Title I, Part A funds can only be used for campuses noted as operating a Schoolwide Program or Targeted Assistance Program.

The only exception is related to the LEA reservation for services to homeless students. The ESSA statute allows for Title I, Part A funds reserved by the LEA for services to homeless students to be used to support homeless students on all campuses regardless of their Title I status.

Q4: Is it allowable to use Title I, Part A funds to pay for instructional activities for students during intersession?

A4: If the campuses are Schoolwide campuses, the use of Title I, Part A funds for intersession instructional activities is allowable as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If one or more of the campuses is Targeted Assistance, the LEA would have

to ensure that only students identified as most in need receive the Title I, Part A services. If one or more of the campuses is a non-Title I campus, this would not be an allowable use of funds for those campuses because Title I, Part A funds can only be used to serve Title I, Part A students. Please refer to the [Title I, Part A Use of Funds document](#). The need for this particular use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan for the campuses. The LEA would also need to be able to document that the use of funds meets the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

Q5: A campus would like to purchase mounted projectors for the family engagement spaces used on the campus. The campus would provide monthly parent and family engagement (PFE) events and provide weekly before and after school events. Can the campus use the Title I, Part A LEA PFE reserved funds to purchase the projectors?

A5: The LEA would need to ensure that they are following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA would specifically need to be able to document how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Additionally, the use of funds would need to have been identified in the comprehensive needs assessment and included in the campus improvement plan.

The LEA would also need to ensure that they are following the requirements for PFE reserved funds which are noted in ESSA Section 1116(a)(3)(D)(i-v) referenced below.

Funds reserved to carry out parent and family engagement activities shall be used to carry out activities and strategies that are consistent with the LEA's parent and family engagement policy, including at least one of the following:

- Supporting schools and nonprofit organizations in providing professional development for LEA and school personnel regarding parent and family engagement strategies, which may be provided jointly to teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, early childhood educators, parents, and family members.
- Supporting programs that reach parents and family members at home, in the community, and at school.
- Disseminating information on best practices focused on parent and family engagement, especially best practices for increasing the engagement of economically disadvantaged parents and family members.
- Collaborating, or providing subgrants to schools to enable such schools to collaborate, with community-based or other organizations or employers with a record of success in improving and increasing parent and family engagement.
- Engaging in any other activities and strategies that the LEA determines are appropriate and consistent with the LEA's parent and family engagement policy.

Q6: The LEA is changing website companies and wanted to do a one-time purchase of a component that is an App. They would like to utilize Title I, Part A funds for this by splitting the cost between their Title I Schoolwide campuses. It will be used to share information with parents. Would this type of purchase be allowable if they are able to answer all of the items on the Title I, Part A Use of Funds document?

A6: The LEA would need to ensure that they are following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA would specifically need to be able to document how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Additionally, the use of funds would need to have been identified in the comprehensive needs assessment and included in the campus improvement plan. Title I, Part A funds can only be used to support Title I, Part A campuses.

If the funds being used for the purchase are from the LEA parent and family engagement (PFE) reservation, the LEA would also need to ensure that they are following the requirements for PFE reserved funds which are noted in ESSA Section 1116(a)(3)(D)(i-v) referenced below.

Funds reserved to carry out parent and family engagement activities shall be used to carry out activities and strategies that are consistent with the LEA's parent and family engagement policy, including at least one of the following:

- Supporting schools and nonprofit organizations in providing professional development for LEA and school personnel regarding parent and family engagement strategies, which may be provided jointly to teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, early childhood educators, parents, and family members.
- Supporting programs that reach parents and family members at home, in the community, and at school.
- Disseminating information on best practices focused on parent and family engagement, especially best practices for increasing the engagement of economically disadvantaged parents and family members.
- Collaborating, or providing subgrants to schools to enable such schools to collaborate, with community-based or other organizations or employers with a record of success in improving and increasing parent and family engagement.
- Engaging in any other activities and strategies that the LEA determines are appropriate and consistent with the LEA's parent and family engagement policy.

Q7: Is it allowable to use Title I, Part A funds to purchase CPR mannequins to train students?

A7: The LEA would need to ensure that they are following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA would specifically need to be able to document how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Additionally, the use of

funds would need to have been identified in the comprehensive needs assessment and included in the campus improvement plan.

Q8: Is it allowable for Title I, Part A funds to be used to pay teachers extra-duty pay for a planning session to develop a tutoring program, or can they only be paid extra-duty pay when they are serving students and student attendance is reported?

A8: Title I, Part A funds can be used to pay teachers extra-duty pay for planning to develop the tutoring program as long as the LEA is following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA would need to be able to document how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Additionally, the use of funds would need to have been identified in the comprehensive needs assessment and included in the campus improvement plan. Extra-duty pay must be supported by documentation and in accordance with the LEA's policies and procedures regarding extra-duty pay.

Q9: Is it allowable for Title I, Part A funds to be used to pay a tutoring coordinator who will manage the scheduling, paperwork, and identifying which students will be served?

A9: Title I, Part A funds can be used to pay a tutoring coordinator as long as the LEA is following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA would need to be able to document how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Additionally, the use of funds would need to have been identified in the comprehensive needs assessment and included in the campus improvement plan. For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on activities that meet the intent and purpose of the Title I, Part A program.

Q10: Is it allowable to use Title I, Part A funds to pay the salary of the Title I Coordinator if their job duties include writing the ESSA grant application?

A10: LEA positions that are 100% paid with federal funds cannot write grant applications. They would need a small percentage of state and/or local funds in their time and effort to cover writing and submitting grant applications/amendments. The work preparing the responses for the application is part of the planning and budget process from evaluating the prior year's program effectiveness. Writing the grant application is defined as completing the application forms and submitting the application to TEA, but the LEA can define it more broadly.

Q11: Is it allowable to use Title I, Part A funds to purchase security cameras for Title I, Part A Schoolwide campuses?

A11: It would be difficult to justify/document that purchasing security cameras would meet the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a

fair, equitable, and high-quality education, and to close educational achievement gaps. However, if the LEA can justify and document such an expense, they would need to follow the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). Additionally, the use of funds would need to have been identified in the comprehensive needs assessment and included in the campus improvement plan.

Q12: Is it allowable to use Title I, Part A funds to pay the salary of a 504 facilitator?

A12: It would be difficult to justify and maintain documentation demonstrating how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. However, if the LEA can document that paying the salary of a 504 facilitator meets the intent and purpose of the Title I, Part A program because it is related to student academic achievement, they would need to ensure that they have followed the steps and requirements noted on the [Title I, Part A Use of Funds document](#) and that the need has been identified as a result of the Comprehensive Needs Assessment process and listed in the Campus Improvement Plan. Additionally, the services could only be provided for students attending schoolwide campuses as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If a campus is a Targeted Assistance campus, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If the students attend non-Title I campuses, this would not be an allowable use of Title I, Part A funds for those campuses.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on Title I, Part A activities. It would also be advisable to note the Title I, Part A duties in the job description for audit and/or random validation purposes.

Q13: Is it allowable to use Title I, Part A funds to pay the salary of a Dyslexia teacher?

A13: The LEA would need to ensure that it is following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). Although utilizing Title I, Part A funds to pay a Dyslexia Teacher's salary is allowable based on the general duties of a teacher and the connection to student academic achievement, the use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan. Additionally, the services could only be provided for students attending schoolwide campuses as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If a campus is a Targeted Assistance campus, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If the students attend non-Title I campuses, this would not be an allowable use of Title I, Part A funds for those campuses.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on

Title I, Part A activities. It would also be advisable to note the Title I, Part A duties in the job description for audit and/or random validation purposes.

Q14: Is it allowable to use Title I, Part A funds to pay for the Texas Success Initiative Assessment (TSIA) fees for students on Title I, Part A Schoolwide campuses?

A14: The use of Title I, Part A funds for the TSIA is allowable as long as the LEA follows the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA needs to be able to document how the activity meets the intent and purpose of the Title I, Part A program which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. The use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan. Additionally, the services could only be provided for students attending schoolwide campuses as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If a campus is a Targeted Assistance campus, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If the students attend non-Title I campuses, this would not be an allowable use of Title I, Part A funds for those campuses.

Q15: Is it allowable to use Title I, Part A funds to pay for stipends?

A15: First, the LEA would need to determine and maintain documentation if the reason for the stipend meets the intent and purpose of the Title I, Part A program which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. If the LEA meets all the steps and requirements noted in the [Title I, Part A Use of Funds document](#) (including documenting an identified need as a result of a comprehensive needs assessment and documenting the activity in the campus improvement plan), it would be considered allowable to pay stipends, taking into consideration the following guidance. As noted in the Title I, Part A Use of Funds document, the stipend amount should also be reasonable and necessary to carry out the intent and purpose of the Title I, Part A program.

If the stipend would benefit campuses identified as schoolwide program campuses, this would not be a problem, as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. It would be difficult to document this use of funds for a Targeted Assistance campus and it would not be allowable for anyone providing services to a non-Title I, Part A campus.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on activities that meet the intent and purpose of the Title I, Part A program.

Time and effort documentation is required for any type of compensation paid with federal funds, including stipends. A stipend should be paid based on policies and procedures adopted by the board or local authorities. A good example is a board approving a policy to pay a stipend in the amount of \$1000 for all teachers with graduate degrees. There is a good chance that this position's regular salary is paid with local funds, but the stipend will be paid out of federal funds.

The LEA must maintain time and effort documentation that describes a policy/reason adopted by the appropriate authority or the board supporting the stipend for such activities. The document must be signed and dated by the supervisor authorizing the stipend.

Q16: Is it allowable to use Title I, Part A funds to pay for the salary of an interventionist?

A16: The LEA would need to ensure that it is following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). Although utilizing Title I, Part A funds to pay an Interventionist's salary is generally allowable based on the general duties of an interventionist and the connection to student academic achievement, the use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan. The LEA would need to ensure that all the duties the position would be performing meet the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

Additionally, the services could only be provided for students attending schoolwide campuses as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If a campus is a Targeted Assistance campus, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If the students attend non-Title I campuses, this would not be an allowable use of Title I, Part A funds for those campuses.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on Title I, Part A activities. It would also be advisable to note the Title I, Part A duties in the job description for audit and/or random validation purposes.

[May/June 2020](#) | [July 2020](#) | [August 2020](#) | [September 2020](#) | [October 2020](#) | [November 2020 – January 2021](#)
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May 2021

Questions and responses are organized by the following topic areas for May 2021:

- [15% Title I, Part A Carryover Limitation](#)
- [District Improvement Plan \(DIP\)/Campus Improvement Plan \(CIP\)](#)
- [ESSA Consolidated Application – Title I, Part A](#)
- [LEA Reservations](#)
- [Supplement, Not Supplant – Title I, Part A](#)
- [Title I, Part A Within-LEA Allocations](#)
- [Use of Funds](#)

15% Title I, Part A Carryover Limitation

Q1: ESSA allows an exception to the 15% limit on carryover for LEAs receiving less than \$50,000 in Title I, Part A funds. If an LEA with less than \$50,000 in Title I, Part A transfers Title II, Part A and/or Title IV, Part A funds into Title I, Part A and therefore has a total over \$50,000, does that exception still apply?

A1: Any funds transferred into the Title I, Part A program through the Rural Education Achievement Program (REAP) or through Funding Transferability will be included in the total amount used to calculate Title I, Part A carryover to determine if the LEA has exceeded the 15% statutory limitation. If the transferred in amounts cause the LEA to go over \$49,999, then the 15% limit will be applied, and the LEA will need to use a waiver if the LEA wants to carryover more than 15%.

District Improvement Plan (DIP)/Campus Improvement Plan (CIP)

Q1: If an LEA makes changes to its DIP or a campus makes changes to its CIP after the plan has already been approved by the school board, do they have to take the DIP or CIP back to the school board for approval?

A1: For the Title I, Part A program, this is a local decision that would depend on the LEA's policies and procedures associated with the board approval of documents.

ESSA Consolidated Application – Title I, Part A

Q1: When thinking about stamp-in dates for ESSA Consolidated Applications, what is the stamp-in date tied to (other than when the application was submitted)? How does the stamp-in date affect payroll and different positions paid from Title I, Part A and LEA positions, in particular?

A1: The funds are not effective for payroll positions until they have been entered on the application and that application has been certified and submitted. The stamp-in date is the date the LEA certified and submitted the application and is the date the funds are effective for a particular position. If an LEA submits an amendment and adds a position, that position has the same stamp-in date as when the amendment was submitted.

Q2: Can you provide clarification as to the PS3101 – Title I, Part A Program Schedule, Part 1B, Line 5: Administration of Title I, Part A reserved funds amount?

A2: An LEA reserves funds in this category for activities related to the administration of Title I, Part A Programs (including administration of Title I, Part A programs for students at facilities for neglected and delinquent). Such costs may include payroll costs associated with the role of the person or persons that manage the Title I, Part A program.

Q3: Are indirect costs included on the PS3101 – Title I, Part A Program Schedule?

A3: Since the reserved funds percentage is calculated based on the total LEA Title I, Part A funds available, if indirect costs are to be charged for any of the activities to be conducted with reserved funds, then they would be included in the amount noted on Part B of the PS3101. Although indirect costs are noted on the budget schedule, the program schedule is different. If some or all the indirect costs being noted in the budget schedule are being used at the LEA level, then the LEA would need to include that amount in the PS3101 – Part 1B; Line 5. The Total Funding and Transfer Amount(s) noted on Part 1A; Line 4 includes all Title I, Part A funds (including any indirect costs that the LEA may classify as indirect costs on the budget schedule) so to accurately reflect funds being reserved at the LEA level, indirect costs would need to be considered when completing the PS3101.

LEA Reservations

Q1: All campuses in an LEA are Title I, Part A served campuses. The LEA reserves Title I, Part A funds each year for services to support homeless students and will continue to do so in the future. I just wanted to clarify the Title I, Part A requirement. What is the requirement if all campuses are Title I, Part A served campuses?

A1: The following reservation requirements apply to all LEAs receiving Title I, Part A funds. The Homeless reservation is required by all LEAs, regardless of the Title I status of their campuses. An amount must be reserved for this purpose at the LEA level (a minimum of \$100 is required at the LEA level). The Homeless reservation should be what the LEA deems to be reasonable and necessary which may be determined based on a needs assessment. The LEA should maintain documentation to demonstrate how the LEA decided on the amount reserved.

Q2: If an LEA reserved the required 1% of their Title I, Part A funds for parent and family engagement but did not expend the full 1%, does the remaining amount carryover for the same purpose in the following year?

A2: LEAs are not required to allocate the amount remaining that is carried over for the same purpose in the following year unless it is required by their local policies and procedures related to carryover funds.

Supplement Not Supplant – Title I, Part A

Q1: If an LEA has paid for transportation for homeless and foster care students out of local funds and now wants to reserve Title I, Part A funds at the LEA level for the same purposes, would it be considered supplanting?

A1: For Title I, Part A purposes, if the LEA has a valid SNS Methodology or a Statement of Exemption in place it would not be considered supplanting for the LEA to use Title I, Part A funds to pay for transportation costs for homeless and foster care students that were previously paid out of local or state funds.

Q2: Does an LEA apply the traditional presumptions of supplant to Title I, Part A campuses implementing a Targeted Assistance Program?

A2: No. The Title I, Part A Supplement Not Supplant (SNS) requirements (SNS Methodology or Statement of Exemption) apply to the Title I, Part A program in its entirety. There are not separate SNS documentation requirements that depend on whether an LEA has campuses implementing a Schoolwide Program or a Targeted Assistance Program. The traditional presumptions of supplant do not exist for the Title I, Part A program.

If an LEA has an SNS Methodology or Statement of Exemption, the LEA has met its SNS documentation requirement and can use Title I, Part A funds on a Targeted Assistance campus for students that have been identified to receive such services. As per the ESSA Statute, Section 1115(c)(1), “eligible children are children identified by the school as failing, or most at risk of failing, to meet the challenging State academic standards on the basis of multiple, educationally related, objective criteria established by the LEA and supplemented by the school, except that children from preschool through grade 2 shall be selected solely on the basis of criteria, including objective criteria, established by the LEA and supplemented by the school.”

Title I, Part A Within-LEA Allocations

Q1: For LEAs implementing the CEP program, is it acceptable for the LEA to use a socio-economic survey to determine the LEA and campus low-income percentages utilized to determine within-LEA allocations?

A1: An LEA can use data from a poverty survey that replicates the National School Lunch Program (NSLP) survey or other poverty data. If the survey replicates the NSLP or other poverty data survey, then it would be acceptable for use in reporting Title I, Part A Low-Income data for the LEA and campuses.

Q2: An LEA has 2 Title I, Part A served campuses that are combining. They will be at a new physical location, with a new name, but will be keeping the PEIMS number of one of the campuses. For the application, would we average the two schools' snapshot (that is the date we use) free/reduced-price lunch information?

A2: The process would remain the same as with all campuses reported on the SC5000. To determine the campus low-income % for the combined campus, the LEA would divide the number of low-income students by the figure entered in the "Total Campus Enrollment" field and enter that result. The LEA would use the number of low-income students, multiplied by the per-pupil amount the LEA chooses, to determine a campus's Title I, Part A allocation.

Please note that LEAs that have a total enrollment of less than 1,000 students can determine per-pupil amounts without any regard to campus low-income percentages. The LEA may choose to serve any and/or all campuses without regards to the campus low-income percentages. Such an LEA may use other criteria, such as academic performance or the grade span of its schools to determine which of its schools receive Title I funds, or it may choose to allocate Title I funds to all of its schools.

Q3: For 2021-2022, I understand that LEAs may use their 2019-2020 National School Lunch Program (NSLP) data if that is the best available information. Which enrollment numbers do they use: 2019-2020 or 2020-2021?

A3: An LEA uses the most recently available data for enrollment, which will be from the previous school year in most cases. Since enrollment data should be available for 2020-2021, they would use enrollment data from 2020-2021. The as-of date is selected by the LEA. The date used to determine enrollment numbers must be the same for all campuses.

Q4: Is it allowable for an LEA to reduce the Title I, Part A allocation for a stand-alone Pre-Kindergarten campus due to other funds being available to the campus?

A4: If the LEA wants to serve the PK campus but wants to adjust the amount of Title I, Part A funds allocated to the campus, they can use the related exception. ESSA Section 1113(c)(2)(B) permits an LEA to reduce the amount of Title I, Part A funds allocated to a Title I, Part A 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. The LEA would need to maintain documentation to that effect and ensure that the reduction of Title I, Part A funds is for State or local sources that meet the intent and purpose of Title I, Part A.

Under 34 C.F.R. 200.79(b), a program meets the intent and purposes of Title I, Part A if the program either—

1. Is implemented in a school in which the percentage of children from low-income families is at least 40 percent;
2. Is designed to promote schoolwide reform and upgrade the entire educational operation of the school to support students in their achievement toward meeting the challenging State academic standards that all students are expected to meet;
3. Is designed to meet the educational needs of all students in the school, particularly the needs of students who are failing, or are most at risk of failing, to meet the challenging State academic standards; and
4. Uses the State’s assessment system to review the effectiveness of the program;

OR

1. Serves only students who are failing, or are most at risk of failing, to meet the challenging State academic standards;
2. Provides supplementary services designed to meet the special educational needs of participating students to support their achievement toward meeting the State’s student academic achievement standards; and
3. Uses the State’s assessment system to review the effectiveness of the program.

It is important to note that if the LEA substitutes 100% of the Title I, Part A funds with supplemental state or local sources, it is essentially “skipping” the campus. A “skipped” campus is not considered a Title I, Part A campus.

Use of Funds

Q1: Is it allowable to use Title I, Part A funds to pay the salary of career and technical education (CTE) teacher?

A1: The LEA would need to ensure that it is following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). Although utilizing Title I, Part A funds to pay a teacher’s salary is generally allowable based on the general duties of an teacher and the connection to student academic achievement, the use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan. The LEA would need to ensure that all the duties the position would be performing meet the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

Additionally, the services could only be provided for students attending schoolwide campuses as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If a campus is a Targeted Assistance campus, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If the students attend non-Title I campuses, this would not be an allowable use of Title I, Part A funds for those campuses.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on

Title I, Part A activities. It would also be advisable to note the Title I, Part A duties in the job description for audit and/or random validation purposes.

Q2: Is it allowable to use Title I, Part A funds to upgrade a culinary arts room to meet industry standards?

A2: Section 8526 of ESSA states that, no funds under this Act may be used for construction, renovation, or repair of any school facility. If an upgrade includes construction, renovation, or repair of any school facility, it would be an unallowable use of Title I, Part A funds.

Q3: Is it allowable to use Title I, Part A funds to upgrade and install stainless steel equipment in the culinary arts room to meet industry standards?

A3: When determining whether Title I, Part A funds can be used it is always important to ensure that the use of funds is reasonable and necessary to carry out the intent and purpose of the Title I, Part A program, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. An LEA would need to be able to document that the use of funds is reasonable and necessary to meet such intent and purpose of the Title I, Part A program.

If the LEA can document that paying for the upgrading and installation of all stainless steel equipment for student use meets the intent and purpose of the Title I, Part A, that they have followed the steps and requirements noted on the [Title I, Part A Use of Funds document](#), and that the need has been identified as a result of the Comprehensive Needs Assessment process and listed in the Campus Improvement Plan, it would be considered an allowable use of Title I, Part A funds. Additionally, the use of funds would only be allowed on Title I, Part A Schoolwide campuses since Title I, Part A funds can only be used to serve Title I, Part A students. It would be difficult to justify and document such costs on a Targeted Assistance campus.

The LEA should also review any policies and procedures referencing construction, renovation, or repair of any school facility to ensure that their definitions of such activities do not include upgrading and installation of equipment because if the definitions do include such activities, it would be an unallowable use of Title I, Part A funds based on Section 8526 of ESSA.

Q4: One of our Title I, Part A Schoolwide campuses is planning a parent engagement event whose purpose is to provide parents with community resources and communicate next school year's district and school initiatives. The parent coordinator at the school would like to be able to provide parents with a canvas tote bag with the campus logo and fill it with pamphlets from local community resources, snacks, and a water bottle with the campus logo. Are these costs allowable use of Title I, Part A funds?

A4: The guidance noted in the most recent version of the [TEA Budgeting Costs Guidance Handbook](#) states the following as it relates to the items referenced.

Page 15 "Supplies and Materials (6300)"

Grant funds **may not** be used for the following:

- Supplies and materials, including electronic devices, for personal use. Must be used only for grant-related activities.
- Costs associated with awards banquets, ceremonies, celebrations, and social events
- Cell phones for personal use
- Gifts or items that could be construed as a gift
- Souvenirs, memorabilia, or **promotional items** (such as T-shirts, caps, **tote bags**, key chains, or imprinted pens)

NOTE: Refer to the “Other Specific Items of Cost” section of this handbook for information on incentives to participate and awards for recognition.

Thus, it would be an unallowable use of Title I, Part A funds to purchase the promotional items referenced.

Q5: Is it allowable to use Title I, Part A funds to pay the salary of school counselor?

A5: The LEA would need to ensure that it is following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). Although utilizing Title I, Part A funds to pay a portion of a Counselor’s salary is allowable based on the general duties of a counselor and the connection to student academic achievement, the use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan. Additionally, the services could only be provided for students attending schoolwide campuses as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If a campus is a Targeted Assistance campus, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If the students attend non-Title I campuses, this would not be an allowable use of Title I, Part A funds for those campuses.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on Title I, Part A activities. It would also be advisable to note the Title I, Part A duties in the job description for audit and/or random validation purposes.

Q6: Is it allowable to use Title I, Part A funds to pay the salary of a computer technician that provides technology support for student devices at Title I, Part A campuses?

A6: The LEA would need to ensure that it is following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA would specifically need to maintain documentation demonstrating how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Although utilizing Title I, Part A funds to pay a Computer Technician’s salary may be allowable, the use of funds would need to have been identified in the comprehensive needs assessment and noted in the campus improvement plan. Additionally, the services could only be provided for students attending schoolwide campuses as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. If a campus is a Targeted Assistance campus, the LEA would have to ensure that only students identified as most in need receive the Title I, Part A services. If the students

attend non-Title I campuses, this would not be an allowable use of Title I, Part A funds for those campuses.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on Title I, Part A activities. It would also be advisable to note the Title I, Part A duties in the job description for audit and/or random validation purposes.

Q7: Is it allowable to use Title I, Part A funds to purchase school supplies for students identified as socioeconomically disadvantaged?

A7: Costs associated with the purchasing of school supplies used to support students attending Title I, Part A schoolwide campuses are allowable under Title I, Part A as long as the LEA meets the Title I, Part A Use of Funds requirements as noted on the [Title I, Part A Use of Funds document](#). On a targeted assistance campus, services should only be provided to students identified as most in need to receive the Title I, Part A services. The use of funds would need to have been identified as a need in the comprehensive needs assessment and noted in the campus improvement plan.

Q8: Is it allowable to use Title I, Part A funds to purchase clothing items such as school uniforms, shoes, socks, and basic hygiene items for students experiencing homelessness?

A8: Costs associated with the purchasing of clothing items such as school uniforms, shoes, socks, and basic hygiene items for students experiencing homelessness are allowable under Title I, Part A regardless of whether a campus is Title I, Part A served. The LEA can utilize the funds reserved at the LEA level for services to homeless students. The homeless set-aside may be used to provide services to homeless students in Title I schools that are not ordinarily provided to other Title I students. The [USDE Education for Homeless Children and Youths Program Non-Regulatory Guidance](#) states the following (Pages 40-41 Question M-4):

“Title I, Part A funds may be used to provide a wide variety of services to homeless students. In addition to providing services to assist homeless students in meeting the State’s challenging academic standards, Title I, Part A funds may be used to provide services to homeless children and youths, including those in Title I schools, that may not ordinarily be provided to other Title I students. (ESEA section 1113(c)(3)(C)(ii)). For example, to help homeless students effectively take advantage of educational opportunities, an LEA may use Title I, Part A funds to provide, where appropriate, items or services including, but not limited to—

- Items of clothing, particularly if necessary to meet a school’s dress or uniform requirement;
- Clothing and shoes necessary to participate in physical education classes;
- Student fees that are necessary to participate in the general education program;
- Personal school supplies such as backpacks and notebooks;
- Birth certificates necessary to enroll in school;
- Immunizations;
- Food;

- Medical and dental services;
- Eyeglasses and hearing aids;
- Counseling services to address anxiety related to homelessness that is impeding learning;
- Outreach services to students living in shelters, motels, and other temporary residences;
- Extended learning time (before and after school, Saturday classes, summer school) to compensate for lack of quiet time for homework in shelters or other overcrowded living conditions;
- Tutoring services, especially in shelters or other locations where homeless students live;
- Parental involvement specifically oriented to reaching out to parents of homeless students;
- Fees for AP and IB testing;
- Fees for college entrance exams such as SAT or ACT; and
- GED testing for school-age students.

Two principles govern the use of Title I, Part A funds to provide such services to homeless students. First, the services must be reasonable and necessary to assist homeless students to take advantage of educational opportunities. (ESEA section 1113(c)(3)(A); 2 CFR § 200.403(a)). Second, Title I, Part A funds must be used only as a last resort when funds or services are not available from other public or private sources, such as the USDA's National School Lunch Program and Breakfast Program, public health clinics, or local discretionary funds (sometimes provided by the PTA) used to provide similar services for economically disadvantaged students generally. (See ESEA section 1115(e)(2))."

Q9: Is it allowable to use Title I, Part A funds to pay board-approved retention stipends to employees that are paid out of Title I, Part A?

A9: If the LEA meets all the steps and requirements noted in the [Title I, Part A Use of Funds document](#) (including documenting an identified need as a result of a comprehensive needs assessment and documenting the activity in the campus improvement plan), it would be considered allowable to use Title I, Part A funds to pay retention stipends to employees that are paid out of Title I, Part A, taking into consideration the following guidance and ensuring that the LEA is able to document how the activity meets the intent and purpose of the Title I, Part A program which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. As noted in the Title I, Part A Use of Funds document, the stipend amount should also be reasonable and necessary to carry out the intent and purpose of the Title I, Part A program.

If the stipend would benefit campuses identified as schoolwide program campuses, this would not be a problem, as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. It would be difficult to document this use of funds for a Targeted Assistance campus and it would not be allowable for anyone providing services to a non-Title I, Part A campus.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met. Time and effort documentation is required for any type of compensation paid with federal funds, including stipends. An employee paid 100% from grant funds will be covered under the periodic certifications.

A stipend should be paid based on policies and procedures adopted by the board or local authorities. A good example is a board approving a policy to pay a stipend in the amount of \$1000 for all teachers with graduate degrees. The LEA must maintain time and effort documentation that describes a policy/reason adopted by the appropriate authority or the board supporting the stipend for such activities. The document must be signed and dated by the supervisor authorizing the stipend.

Q10: Is it allowable to use Title I, Part A funds to pay the salary of summer school staff (principals, assistant principals, school nurses, PEIMS clerks, registrars, and attendance clerks)?

A10: When determining whether Title I, Part A funds can be used for payroll it is important to ensure that the use of funds is reasonable and necessary to carry out the intent and purpose of the Title I, Part A program which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. An LEA would need to be able to document that the use of funds would meet such intent and purpose of the Title I, Part A program.

It would be difficult to justify and maintain documentation demonstrating how the use of funds for the positions referenced (principals, assistant principals, school nurses, PEIMS clerks, registrars, and attendance clerks) is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. However, if the LEA can document that paying the salary for any of those positions meets the intent and purpose of the Title I, Part A, they would need to ensure that they have followed the steps and requirements noted on the [Title I, Part A Use of Funds document](#) and that the need has been identified as a result of the Comprehensive Needs Assessment process and listed in the Campus Improvement Plan. Additionally, the use of funds would only be allowed on Title I, Part A Schoolwide campuses since Title I, Part A funds can only be used to serve Title I, Part A students. It would be difficult to justify and document such payroll costs on a Targeted Assistance campus.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on Title I, Part A activities. It would also be advisable to note the Title I, Part A duties in the job description for audit and/or random validation purposes.

[May/June 2020](#) | [July 2020](#) | [August 2020](#) | [September 2020](#) | [October 2020](#) | [November 2020 – January 2021](#)
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June 2021

Questions and responses are organized by the following topic areas for June 2021:

- [Comprehensive Needs Assessment](#)
- [LEA Reservations](#)
- [Title I, Part A Requirements for Paraprofessionals](#)
- [Title I, Part A Within-LEA Allocations/SC5000](#)
- [Use of Funds](#)

Comprehensive Needs Assessment

Q1: An LEA has decided to combine all their campuses (elementary, middle, and high) into one campus with one campus ID number. Do they need to engage in the comprehensive needs assessment (CNA) process separately, or is it acceptable for the newly formed campus to engage in one comprehensive needs assessment process?

A1: The new consolidated campus would just need to have gone through the CNA process once taking into consideration the needs of the new students that are being added to the campus.

Please note the following since you mention that the LEA has combined all its campuses.

It is acceptable for a small LEA or single campus LEA to have a document that consolidates the Campus Improvement Plan (CIP) and District Improvement Plan (DIP) into one document, but they must identify goals/activities separately for the district and campuses. For audit and/or random validation monitoring purposes, an LEA may be asked to identify specific goals/activities listed in their DIP and CIP to support the activity. If the expense is charged at the campus level, an auditor will want to see that activity identified in the CIP. Similarly, if the expense is charged at the LEA level, an auditor will want to see the activity identified in the DIP.

Although a Campus Improvement Plan is required for Title I, Part A campuses, state law requires all campuses to have a CIP and all LEAs to have a DIP. TEC 11.252 lists the state requirements for the DIP, but the LEA should also review the Title I, Part A provisions and assurances to see what assurances and descriptions are required to be included in the plan. (Likewise, for other federal grant programs the LEA participates in.) TEC 11.253 lists the state requirements for each CIP. If the LEA is wanting a single document to serve for all its campuses, it should be very clear which campus needs, goals, and activities go with which campus. The LEA should also review the Title I, Part A provisions and assurances for schoolwide programs to be sure that all the required descriptions and assurances are included for the campus that is schoolwide.

LEA Reservations

Q1: If an LEA has Title I, Part A served campuses and non-Title I, Part A campuses, may the LEA reserve funds for Districtwide Professional Development activities?

A1: The LEA may reserve funds for Districtwide Professional Development activities to support Title I, Part A served campuses only. Non-served campuses cannot benefit from LEA reserved funds for Districtwide Professional Development activities.

Q2: If an LEA has Title I, Part A served campuses and non-Title I, Part A campuses, may the LEA reserve funds for Districtwide Parent and Family Engagement (PFE) activities?

A2: If the LEA receives over \$500,000 in Title I, Part A funds, they are required to reserve funds for PFE activities. If the LEA receives \$500,000 or less in Title I, Part A funds, the LEA may reserve funds for Districtwide PFE activities. The PFE reserved funds can only be used to support Title I, Part A served campuses.

Title I, Part A Requirements for Paraprofessionals

Q1: Can college remedial courses count towards the completion of 48 semester hours requirement noted in the [requirements for Title I, Part A Paraprofessionals](#)?

A1: It is a local decision. If the LEA's policies and procedures allow for accepting remedial courses when hiring individuals, the LEA could accept the courses for this purpose. If the LEA does not accept remedial courses as per the LEA's hiring practices, then the LEA would not accept them for this purpose.

Title I, Part A Within-LEA Allocations/SC5000

Q1: Is the LEA's low-income percentage in part one of schedule SC5000 based only on students ages 5 to 17 as of the snapshot date (date we are using for enrollment)?

A1: The LEA Total Low-Income % is calculated by dividing the total number of students who meet the LEA's selected poverty measure by the LEA's total number of students (either residing or enrolled, as the LEA has determined).

The LEA has several options concerning the data it uses to calculate low-income percentages. Statute allows LEAs to select from the following measures of poverty:

- Children eligible for free and/or reduced-price lunches under the National School Lunch Act;
- Children in families receiving assistance under Title IV, Part A of the Social Security Act (Temporary Assistance to Needy Families, or TANF);
- Children eligible to receive medical assistance under the Medicaid program;
- Children, ages 5 through 17, inclusive, in poverty as counted in the most recent LEA-level census poverty data approved by the US Department of Education; or

- Note: Because census data are generally not available at the school level, if an LEA uses this measure, it would most likely be part of a composite with one or more of the above measures
- A composite of any of the above measures.

The LEA would be restricted to ages 5 through 17 only if they were selecting the 4th bulleted item solely as their only measure of poverty. For all other data (bullets # 1, 2, 3 and 5), the low-income percentage would be based on student enrollment numbers regardless of student ages.

Q2: Are the campus numbers (enrollment and low-income percentage) based on our LEA procedures and may include students who are 18 years of age on the snapshot date?

A2: Whichever data option the LEA selects, the LEA must use the same measure of poverty as noted in Q1 above—

- To identify eligible campuses;
- To determine the campus rankings; and
- To determine Title I, Part A allocations to campuses.

For campuses, the LEA would be restricted to ages 5 through 17 only if they were selecting the 4th bulleted item solely as their only measure of poverty as noted in Q1 above. For all other data (bullets # 1, 2, 3 and 5), the low-income percentage would be based on student enrollment numbers regardless of student ages if the basis of eligibility being selected for the campuses is “enrollment.”

Q3: Based on US Department of Agriculture flexibility related to the Pandemic, students will not be required to complete and return a National School Lunch Program (NSLP) application. Thus, our LEA will not have data available for determining low-income percentages. Can the LEA create a low-income survey to determine low-income percentages?

A3: In a Fact Sheet released by the [US Department of Education \(USDE\)](#) on January 4, 2021, related to NSLP data, they stated that an LEA can use data from a poverty survey that replicate NSLP or other poverty data. If the form replicates NSLP or other poverty data, then it would be acceptable for use in reporting Title I, Part A Low-Income data. The poverty thresholds to be used would be the same ones used to calculate Free and Reduced Priced Lunch eligibility. Community Eligibility Provision (CEP) campuses use this method since they do not collect NSLP applications. Additionally, if the LEA does not have the best available poverty data from 20-21 because they did not collect a survey, they can use 19-20 data.

Q4: Based on the flexibility provided by the US Department Education (USDE) related to using school year (SY) 2019-2020 data for determining low-income percentages, what documentation would the LEA need to maintain if using this flexibility?

A4: The LEA would need to maintain the same documentation that was kept when the 2019-2020 poverty data were entered for the 2020-2021 SC5000. Each LEA is required to maintain auditable documentation locally supporting the poverty numbers provided on the SC5000 in the case of an

audit and/or random validation monitoring. If the LEA uses SY 2019-2020 National School Lunch Program (NSLP) data as the LEA selected measure of poverty, the LEA would need to maintain auditable documentation that supports that the LEA used the same measure of poverty data for the LEA and all campuses and that the date used to determine low-income data and enrollment numbers was the same for all campuses. Examples of the documentation would be NSLP student information system generated reports and the actual NSLP applications that support the numbers from reports generated by the NSLP student information system.

Q5: For LEAs who ordinarily use Direct Certification as their Basis of Eligibility but are providing meals to students using Summer Seamless Option, may we still enter their Direct Certification % on the SC5000? Or is there something else we should do?

A5: If an LEA is using direct certification as a basis of eligibility, for the low-income percentage, the LEA would enter the % of students on the campus that are considered low-income based on direct certification. Keep in mind that the number of students directly certified is a subset of the total number of students eligible for free and reduced-priced meals.

Q6: May LEAs choose to use 2019-2020 enrollment and National School Lunch Program (NSLP) numbers on the SC5000 for the 2021-2022 ESSA Consolidated Application?

A6: For enrollment, an LEA uses the most recently available data, which will be from the previous school year in most cases. Since enrollment data should be available for 2020-2021, the LEA would use enrollment data from 2020-2021. The as-of date is selected by the LEA. The date used to determine enrollment numbers must be the same for all campuses.

The [US Department of Education](#) released a Fact Sheet on January 4, 2021 with the following non-regulatory guidance related to low-income percentages for within-LEA allocations.

Due to the novel Coronavirus disease 2019 (COVID-19), the U.S. Department of Agriculture's (USDA's) Food and Nutrition Service (FNS) granted nationwide waivers (USDA waivers) through June 30, 2021, to support access to nutritious meals while minimizing potential exposure to COVID-19. The USDA waivers relate to the National School Lunch Program (NSLP), the School Breakfast Program (SBP), the Seamless Summer Option (SSO), and the Summer Food Service Program (SFSP).

For LEAs that choose to participate under the USDA waivers, complete NSLP data collected through household applications may not be available from school year (SY) 2020-2021. To the extent that SEAs and LEAs use NSLP data to help carry out the Title I, Part A program, they ordinarily would use NSLP data from SY 2020-2021 to implement their Title I, Part A program in SY 2021-2022 because the SY 2020-2021 data would be the best data available. The information that follows outlines options for LEAs to successfully implement their Title I, Part A program without complete NSLP data.

To the extent that NSLP data from SY 2020-2021 are not available, options available to an LEA for its within-LEA allocations in SY 2021-2022 include using:

- Medicaid or Temporary Assistance to Needy Families (TANF) data or a composite of data of these two sources from SY 2020- 2021;
- The best available NSLP data, ***which may be from SY 2019-2020***;
- NSLP data from SY 2020-2021 that may be accessible (e.g., counts of children identified through direct certification);
- A composite of NSLP, Medicaid, and TANF data, which might include Medicaid or TANF counts from SY 2020-2021 and the best available FRPL data, ***which may be from SY 2019-2020***; or
- Data from a poverty survey conducted by the SEA or LEA that replicate NSLP, Medicaid, or TANF data.

Use of Funds

Q1: After determining that all the Title I, Part A use-of-funds steps and requirements have been met as per the [Title I, Part A Use of Funds document](#), can an LEA pay for a software program license at the beginning of the year?

A1: As per the [EDGAR FAQ document](#) (Question 7.10 – Page 24), “As long as the subgrantee receives the full benefit of the subscription (full access to the service) at the beginning of the grant year, the contract for that grant year may be paid at the beginning of the period of availability. If the subscription contains items that are not all available at the beginning of the service, such as completing one level of the software before the next level is available, then you may only pay for the service that has been invoiced and received during the period of the invoice. In this example, you could not pay for the entire year of the subscription at the beginning of the grant year because you have not received the full benefit (full access).”

Q2: We have Title I, Part A campuses that closed at the end of this school year, and they have funds that they left unspent. It would not be reasonable or necessary to spend these remaining funds to purchase items for campuses that are closing. May I redistribute these funds to purchase items for the remaining Title I campuses without violating the Title I, Part A campus allocations requirements?

A2: Under these circumstances, it would be acceptable to reallocate funds that were remaining from closed campuses to the remaining campuses. The LEA would need to make sure that they remain in compliance with the rank and serve requirements for the remaining campuses. If the LEA is not using within grade-span groupings, the LEA must allocate a per-pupil amount that is equal to or higher to campuses with higher poverty rates than it allocates to campuses with lower poverty rates. If the funds are evenly distributed as noted, this should not be a problem since the per-pupil amounts should have already met the requirements. The LEA would need to document the reasons for their deviation from the initial campus allocations as they noted in their explanation in the case of an audit and/or random validation monitoring.

Q3: As part of the HB3 Reading Academies requirement, our LEA has decided to utilize existing LEA staff to serve as the blended facilitators for this program. To date, the salaries for these staff members are federally funded under Title I, Part A. It has been recommended by our LEA

leadership that a one-time stipend be added on top of the annual salary for these duties. Is this allowable under Title I, Part A since the HB3 Reading Academies are a state requirement? If it is unallowable, would it be allowable to fund the stipend out of another fund source for the employees that are paid with Title I, Part A funds?

- A3: If the LEA has a valid SNS methodology or Statement of Exemption, the use of Title I, Part A funds to pay for costs associated with the state-required Reading Academies would be an allowable use of Title I, Part A funds. Once that is accomplished, either through a Title I-neutral SNS Methodology or by through a Statement of Exemption, the supplemental requirement for Title I, Part A funds at the campus level has been met. For district-level funds, the LEA must ensure that it is using State and local funds that are retained at the LEA level in a Title I neutral manner. Then any Title I, Part A funds that are reserved at the LEA level are also considered to be supplemental in nature. Professional development is an allowable use of funds under Title I, Part A as long as it is being provided for schoolwide program/targeted assistance program teachers and the use-of-funds steps and requirements are followed as per the [Title I, Part A Use of Funds document](#).

Since the inception of ESSA, the method of determining compliance with the Supplement, Not Supplant requirements for Title I, Part A changed. For Title I, Part A, LEAs are no longer required to adhere to the traditional presumptions of supplant (of which one traditional presumption included state requirements). The requirement related to Supplement, Not Supplant for Title I, Part A is that the LEA must have a valid Supplement, Not Supplant Methodology or a Statement of Exemption in place. For more information related to the methodology or statement of exemption, [click here to access the most current version of the Supplement, Not Supplant Handbook](#).

Please note that the traditional presumptions of supplant are still in place for other federal programs (i.e., including but not limited to Title II, Part A and Title IV, Part A). For a complete list of federal programs that still take into account the traditional presumptions of supplant, [click here to access the most current version of the Supplement, Not Supplant Handbook](#).

To utilize Title I, Part A funds to pay for a stipend, the LEA would first need to determine and maintain documentation if the reason for the stipend meets the intent and purpose of the Title I, Part A program, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. If the LEA meets all the steps and requirements noted in the [Title I, Part A Use of Funds document](#) (including documenting an identified need as a result of a comprehensive needs assessment and documenting the activity in the campus improvement plan), it would be considered allowable to pay stipends, taking into consideration the following guidance. As noted in the Title I, Part A Use of Funds document, the stipend amount should also be reasonable and necessary to carry out the intent and purpose of the Title I, Part A program.

If the stipend would benefit campuses identified as schoolwide program campuses, this would not be a problem, as long as the LEA has a valid SNS Methodology or a Statement of Exemption in place. It would be difficult to document this use of funds for a Targeted Assistance campus, and it would not be allowable for anyone providing services to a non-Title I, Part A campus.

For audit and/or random validation purposes, the LEA would need to keep documentation on file that demonstrates that the time and effort requirements are met and documentation that supports the funds being charged to Title I, Part A are related to time spent working directly on activities that meet the intent and purpose of the Title I, Part A program.

Time and effort documentation is required for any type of compensation paid with federal funds, including stipends. A stipend should be paid based on policies and procedures adopted by the board or local authorities. A good example is a board approving a policy to pay a stipend in the amount of \$1000 for all teachers with graduate degrees. There is a good chance that this position's regular salary is paid with local funds, but the stipend will be paid out of federal funds or vice versa. The LEA must maintain time and effort documentation that describes a policy/reason adopted by the appropriate authority or the board supporting the stipend for such activities. The document must be signed and dated by the supervisor authorizing the stipend.

It is allowable for an employee whose salary is paid out of Title I, Part A to be paid a stipend from another fund source as long as it meets the use of funds requirements for that fund source.

Q4: May Title I, Part A funds be used to purchase band instruments with approximately half of the LEA's Title I, Part A allocation?

A4: The LEA would need to ensure that they are following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA would specifically need to be able to document how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. As noted in the Title I, Part A Use of Funds document, the amount should also be reasonable. It could be difficult to justify that using half of the LEA's Title I, Part A allocation for band instruments is reasonable and necessary to carry out the intent and purpose of the Title I, Part A program. The LEA would also need to consider the rank and serve requirements related to campus allocations to ensure that the funds used to purchase the instruments are from a campus allocation. However, if the LEA can document and provide a rationale that justifies the use of funds, it may use Title I, Part A funds. In the case of an audit, the LEA would need to have auditable documentation justifying the use of funds. Additionally, the use of funds would need to have been identified in the comprehensive needs assessment and included in the campus improvement plan.

Q5: May Title I, Part A funds be used to purchase furniture (i.e., shelves for a library, locked cabinets for chemical storage in a science lab)?

A5: The LEA would need to ensure that they are following the steps and requirements for Title I, Part A use of funds as per the [Title I, Part A Use of Funds document](#). The LEA would specifically need to be able to document how this use of funds is necessary to carry out the intent and purpose of Title I, Part A, which is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps. Additionally, the use of funds would need to have been identified in the comprehensive needs assessment and included in the campus improvement plan (CIP).

When a campus writes a CIP, they usually tie their activities to strategies and goals. If they can tie the purchase of furniture to an activity, strategy, and goal, then they could evaluate the effectiveness of how the use of funds was in meeting the goal identified. They could also use this rationale as part of their documentation related to how the use of funds is necessary to carry out the intent and purpose of the Title I, Part A program.

On another note, when it comes to furniture, the [Budgeting Costs Guidance Handbook](#) does mention that it is possible that furniture could be capitalized depending on the cost of the furniture and local policies/procedures for capital outlay. In that case, “all capital outlay requires specific approval from TEA.”