

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.

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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.

Response
updated on
11/03/2020
Text added

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 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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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.

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

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.