

## Department of Grant Compliance and Administration

### Statewide Training Series

#### Questions & Answers

Training Title: Title I, Part A Program Overview

Training Date: 06/22/2021

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

**Q1: Is it correct that an LEA may not have total LEA reservations that exceed 10% of the total Title I, Part A allocation?**

A1: Although Title I, Part A funds must be allocated to campuses as per the rank and serve statutory requirements, there is no statutory required percent of funds to be allocated to campuses. If the LEA total reservation exceeds 30%, TEA will contact the LEA for a justification.

**Q2: If an LEA does not have any private schools that choose to participate in Title I, Part A, is the LEA required to reserve funds for private school equitable services?**

A2: If an LEA does not have participating private schools for Title I, Part A equitable services, it must maintain documentation of outreach efforts and/or private school responses that decline equitable services. The LEA would not reserve equitable services for non-participating private schools.

**Q3: If an LEA has one prekindergarten campus serving only 3- and 4-year-old students, is the Title I, Part A campus eligibility based on the age of the students they serve, or their within-LEA ranking based on the percentage of low-income students on the campus?**

A3: The campus' eligibility to receive Title I, Part A funds must be based on the low-income percent for the campus and in accordance with the statutory requirements for ranking and serving Title I, Part A eligible campuses.

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 4<sup>th</sup> 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.

If the LEA wishes to qualify the preschool campus for Title I, Part A, the LEA would need to use a poverty measure other than the Census low-income data, or at least use a composite that included at least one additional measure from the list above. Otherwise, the LEA would not be able to consider students under the age of 5 in its determinations of the campus low-income percentages.

**Q4: On the PS3101 of the ESSA Consolidated Application, how does an LEA determine the amount of funds to set aside for Services to Eligible Private School Students and Homeless Students?**

A4: For services to eligible private school students, there is a reservation calculation worksheet that the LEA completes in the ESSA Consolidated Federal Grant Application. It is referenced as the PS3099. For services to homeless students, an amount must be reserved for this purpose (a minimum of \$100 is required). The 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.

**Q5: Does the parent and family engagement policy for LEA and/or campuses require school board approval or is it okay to include the policy in our administrative regulations and our department handbook/plan without the board voting to approve it as a board policy?**

A5: The LEA would need to follow their local policies and procedures for policy adoption.

**Q6: How does TEA communicate the status on the documentation submitted in a random validation?**

A6: TEA communicates the results of the random validation process to LEA administration via email. The correspondence will include whether the LEA met the requirements or if improvement is needed. If improvement is needed, the TEA random validation checklist is provided to the LEA as a tool for improvement. ESC federal programs staff are copied on the results notification emails. If an LEA needs improvement, ESC federal programs staff offer and provide technical assistance to the LEA to ensure compliance with the random validation item in question.

**Q7: If the LEA only has three campuses with no grade levels that overlap, and all three campuses are eligible to implement a Title I, Part A schoolwide program, can the LEA still allocate a higher per-pupil amount for the elementary school if the middle school has a higher low-income percent?**

A7: An LEA may determine eligibility within grade spans and choose which grade span(s) to serve. In doing so, the LEA may use its district-wide percentage of poverty or the percentage of poverty data of the relevant grade span(s). If a grade-span poverty percentage is above 35 percent, the LEA may also identify as eligible any school with a poverty percentage of at least 35 percent. If there is only one school in a grade span, that school is eligible for Title I funds, provided that any school above 75 percent poverty has received a Title I, Part A allocation.

Consistent with statutory requirements, the LEA must ensure that its school above 75 percent poverty receives a per-pupil allocation that is at least as high as the per-pupil allocations of all its other campuses. When an LEA allocates Title I funds by grade span, the rule that the LEA must allocate a higher per-pupil amount to campuses with higher poverty rates than it allocates to campuses with lower poverty rates would apply within each grade span and not across grade spans for campuses grouped with a low-income percent of 75 and below.

**Q8: Is there a template to determine the Title I, Part A per-pupil amounts and campus allocations?**

A8: We currently do not have a template. We are looking to have one developed that will be shared through the [Statewide ESSA Title I, Part A Capacity Building Initiative](#) when it is available for sharing.

**Q9: Our district has used a TEA Use of Funds Questionnaire in the past for purchases over \$1000 as a best practice. Is the use of this form still a requirement for Title I, Part A? I have not found it on your website. Please advise.**

A9: TEA requires that an LEA follow the steps and requirements for use of Title I, Part A funds that are identified in the [Title I, Part A Use of Funds](#) document for all expenditures regardless of dollar amount. There is not a specific form that is required. There are some EDGAR-related expenditure forms that can be found on the [TEA Forms for Prior Approval, Disclosure, and Justification webpage](#).

**Q10: Are there exemplar SNS documents we can review?**

A10: Section C of the [Supplement, Not Supplant Handbook](#) provides examples of SNS Methodologies and Section F provides templates for the Statement of Exemption and an SNS Methodology. An LEA is not required to use these templates, but the information and elements contained in the template must be present in the LEA's documentation.

**Q11: For private school equitable services (PNP) we are required to contact the private schools to see if they wish to participate in Title I, Part A. Our Education Service Center (ESC) provides a list of PNP's within our LEA area. Is that a sufficient list to ensure we contact those PNPs for possible participation in Title I, Part A?**

A11: No, it is not sufficient to only use the list an ESC has provided.

An LEA has a responsibility to contact all private schools within the district that might have students eligible to participate in Title I programs—i.e., students who live in a participating Title I public school attendance area in the LEA. An LEA also has a responsibility to contact private schools outside the district if the LEA has reason to believe students who reside in a participating Title I public school attendance area attend those schools. An LEA may not be aware, however, of every instance in which a student who resides in a participating Title I public school attendance

area attends a private school outside of the district. Thus, if a private school has students it believes may be eligible for Title I services because they reside in a participating Title I public school attendance area in another LEA and the private school has not been contacted by that LEA, it would be prudent for private school officials to contact the LEA directly in order to ensure that their eligible students are considered for Title I services.

**Q12: Can PNPs also participate in Title II or is it only Title I?**

A12: Yes, eligible PNP schools located within the district boundaries may participate with Title II, Part A services.

**Q13: Where can we find the form that TEA uses to determine if an expenditure/activity is allowable (i.e., for Field Trips)?**

A13: TEA requires that an LEA follow the steps and requirements for use of Title I, Part A funds that are identified in the [Title I, Part A Use of Funds](#) document for all expenditures. There are some EDGAR-related expenditure forms that can be found on the [TEA Forms for Prior Approval, Disclosure, and Justification webpage](#).

**Q14: Is there a translation policy template?**

A14: We currently do not have a template. We are looking to identify exemplars of translation policies that can be shared through the [Statewide Title I, Part A Parent and Family Engagement Initiative](#) when they are vetted and available for sharing.

**Q15: Please explain more about preschool and Title I, Part A. We have a preschool campus where all students meet eligibility for free or reduced lunch, but they are not considered a Title I, Part A campus. Why?**

A15: If the campus meets Title I, Part A eligibility criteria based on the poverty measure selected, it may be served. There are flexibilities provided in statute to LEAs that include not serving a campus or skipping a campus. Ultimately, the LEA would need to ensure that it is allocating funds to eligible Title I, Part A campuses in accordance with the statutory requirements for ranking and serving Title I, Part A eligible campuses.

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 4<sup>th</sup> 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.

If the LEA wishes to qualify the preschool campus for Title I, Part A, the LEA would need to use a poverty measure other than the Census low-income data, or at least use a composite that included at least one additional measure from the list above. Otherwise, the LEA would not be able to consider students under the age of 5 in its determinations of the campus low-income percentages.

**Q16: What is the difference in lines 2 and 3 of section B of the PS3101 – Title I, Part A program schedule in the ESSA Consolidated Application? What does it mean by Administration of Title I, Part A Programs for Eligible Private School (PNP) Students?**

A16: Line 2 references the total calculation of the private school reservation as noted on the PS3099. Line 3 references any funds reserved at the LEA level for the administration of PNP equitable services. Funds may be reserved at the LEA level for the costs associated with administering the Title I, Part A program. An example is the LEA using Title I, Part A funds reserved at the LEA for the salary of their Title I, Part A Director that administers and manages the program at the LEA level.