



Department of Grant Compliance and Administration

Statewide Training Series

Title I, Part A Use of Funds

Presented by the
Federal Program Compliance Divisions
June 23, 2021

Title I, Part A Use of Funds

Federal Program Compliance Division

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Participants will gain a better understanding of...



- ✓ **general requirements** for use of Title I, Part A funds and
- ✓ **resources available** for determining allowability of Title I, Part A funds.

TEA's Strategic Priorities and Enablers

Every child, prepared for success in college, a career or the military.

Strategic priorities

RECRUIT → SUPPORT → RETAIN

Recruit, support
and retain teachers
and principals



Build a foundation
of reading and math



Connect high school
to career and college



Improve
low-performing
schools

Enablers



Increase **transparency**, **fairness** and **rigor** in district and campus
academic and financial performance



Ensure **compliance**, effectively **implement legislation**
and **inform** policymakers



Strengthen **organizational foundations**
(resource efficiency, culture, capabilities, partnerships)

Use of Funds

- Resource available:
 - One-page reference sheet

These are the steps and requirements for using Title I, Part A funds.

1. The campus in question must be a Title I, Part A campus.
2. LEAs must have a valid Supplement Not Supplant methodology for allocating State and local funds to campuses, or Statement of Exemption.
[In both situations, the LEA must also ensure that State and local funds that are reserved at the LEA level are used to support activities that do not take the Title I status of campuses into account. Any Title I, Part A funds that are reserved at the LEA level must be used for activities that meet the intent and purpose of Title I, Part A, as well as items 3-5, below.]
3. LEAs should ensure that activities and/or resources are:
 - Identified in the Comprehensive Needs Assessments;
 - Included in the Campus Improvement Plan;
 - The plan addresses how the activity/resource identified will be evaluated; and
 - The plan addresses how the needs of students at risk of not meeting State Standards are being met.
 - Reasonable;
 - Necessary to carry out the intent and purpose of the Title I, Part A program;
 - Allocable; and
 - Allowable under Title I, Part A
4. The LEA assures that the expenditure(s) meet all EDGAR requirements.
5. The LEA assures that all district policies and procedures were followed.

LEA Reservations Use of Funds

Allowable Use of Title I, Part A Funds



**Schoolwide
Program
Campuses**



**Targeted
Assistance
Campuses**



**Campuses
with Homeless
Children &
Youth**

Unallowable Use of Title I, Part A Funds



**Title I,
Part A
Skipped
Campuses**



**Title I,
Part A
Not
Served
Campuses**



**Non -
Title I,
Part A
Eligible
Campuses**



- A “districtwide” Title I, Part A program does NOT mean that non-Title I campuses participate.
- Only Title I campuses participate.
- A Title I, Part A preschool program only includes Title I, Part A campuses with preschool.

A background image showing a group of students sitting around a table, engaged in a learning activity. They are using tablets and colorful mathematical manipulatives (like blocks and beads) to explore concepts. One student in the foreground is smiling and looking at a tablet. The image is slightly faded to allow the text to be prominent.

Title I, Part A Use of Funds Requirements for Local Education Agencies (LEAs)

Title I, Part A Use of Funds

Checklist

- ☐ Comprehensive Needs Assessment & Campus Improvement Plan
- ☐ Supplement, Not Supplant Methodology
- ☐ EDGAR Requirements
- ☐ LEA Policies and Procedures
- ☐ Additional Requirements

Title I, Part A Use of Funds

Checklist

- ☒ Comprehensive Needs Assessment & Campus Improvement Plan
- ☒ Supplement, Not Supplant Methodology
- ☒ EDGAR Requirements
- ☒ LEA Policies and Procedures
- ☒ Additional Requirements

Title I, Part A Served Campus



Title I, Part A Use of Funds

Checklist

☒ Comprehensive Needs Assessment & Campus Improvement Plan

☐☐☐☐



**Comprehensive Needs Assessment
(CNA)**



**Campus Improvement Plan
(CIP)**

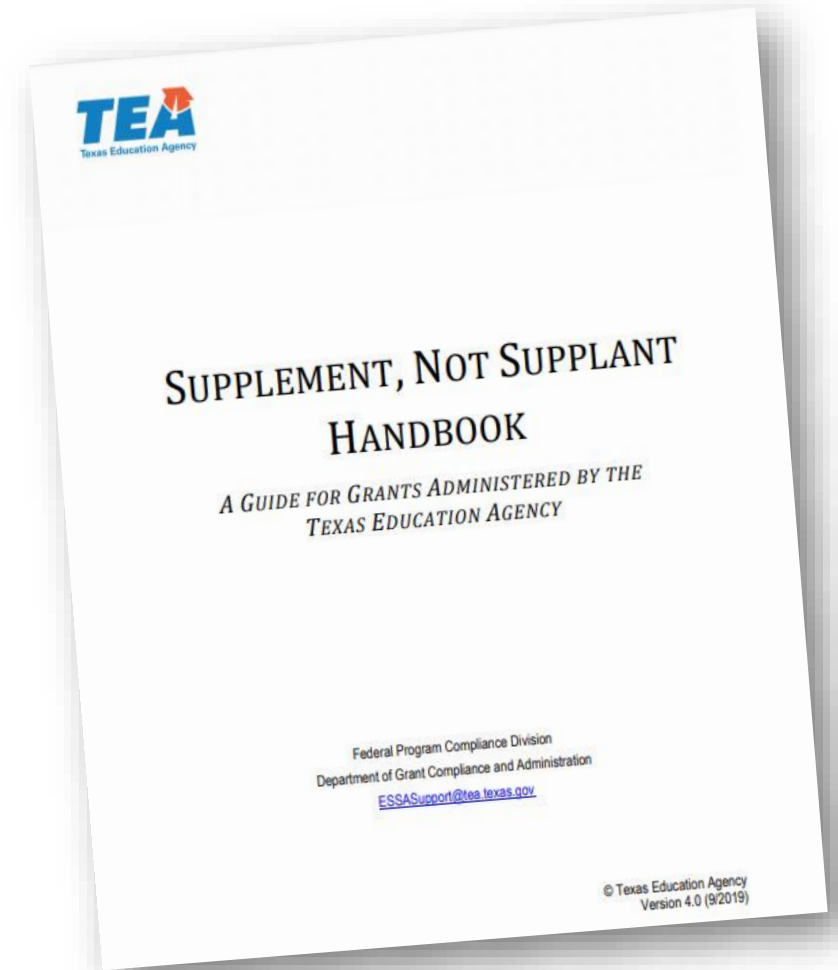
Title I, Part A Use of Funds

Checklist

- ☐ Comprehensive Needs Assessment & Campus Improvement Plan
- ☒ Supplement, Not Supplant Methodology
- ☐ _____
- ☐ _____
- ☐ _____

Supplement, Not Supplant (SNS) Methodology – Title I, Part A

For Title I, Part A, LEAs must have a valid Supplement, Not Supplant methodology for allocating State and local funds to campuses, or Statement of Exemption.



Title I, Part A Use of Funds

Checklist

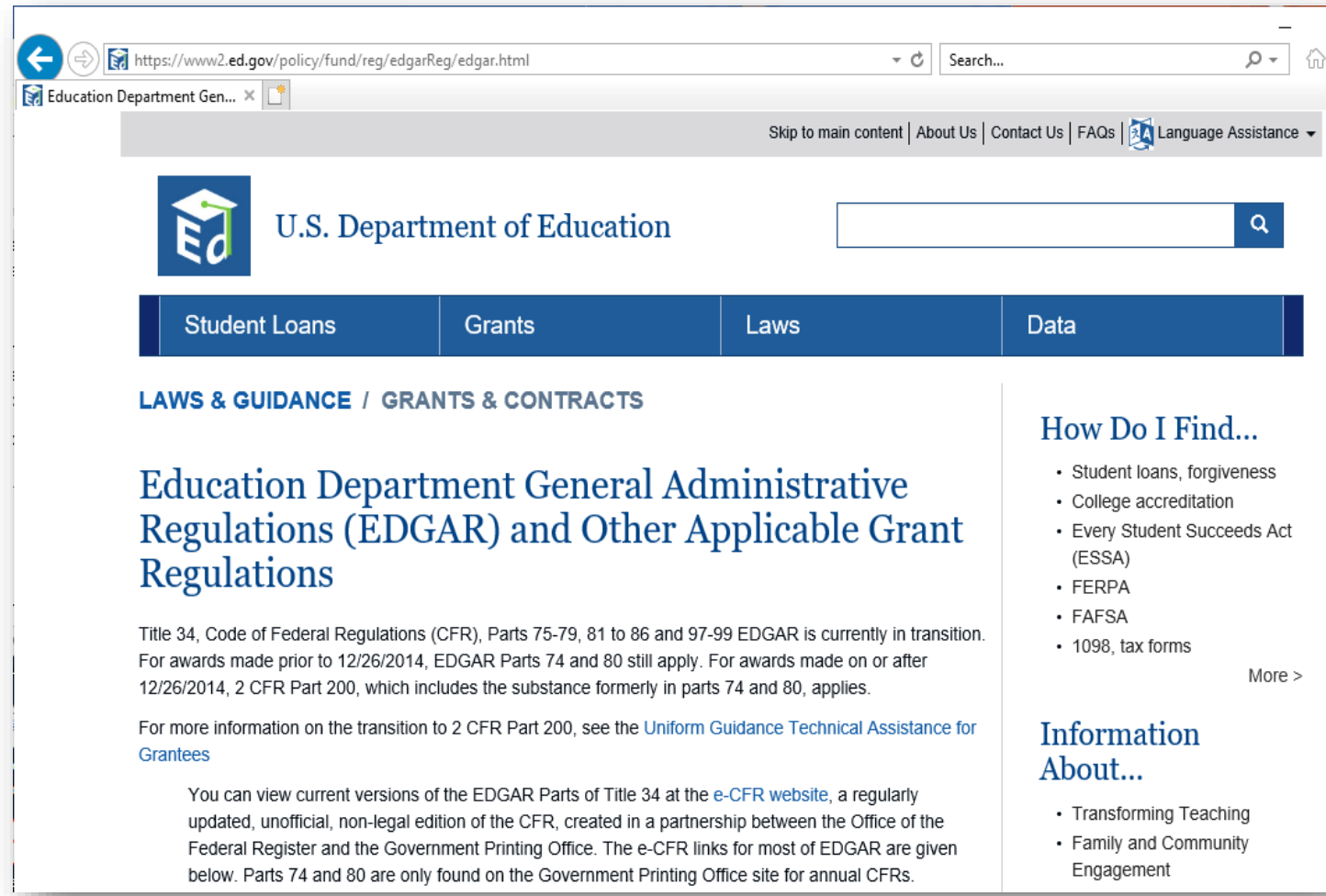
☐ Comprehensive Needs Assessment &
Campus Improvement Plan

☐ Supplement, Not Supplant Methodology

☒ **EDGAR Requirements**

☐☐

E D G A R



The screenshot shows the U.S. Department of Education website. The browser address bar displays the URL: <https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>. The page header includes navigation links: "Skip to main content", "About Us", "Contact Us", "FAQs", and "Language Assistance". The main navigation bar features the U.S. Department of Education logo and a search bar, with tabs for "Student Loans", "Grants", "Laws", and "Data". The page title is "Education Department General Administrative Regulations (EDGAR) and Other Applicable Grant Regulations". The content area provides information about the transition to 2 CFR Part 200, stating that for awards made prior to 12/26/2014, EDGAR Parts 74 and 80 still apply. It also mentions that for awards made on or after 12/26/2014, 2 CFR Part 200 applies. A link is provided for more information: "Uniform Guidance Technical Assistance for Grantees". A sidebar on the right titled "How Do I Find..." lists links for "Student loans, forgiveness", "College accreditation", "Every Student Succeeds Act (ESSA)", "FERPA", "FAFSA", and "1098, tax forms". Another sidebar titled "Information About..." lists links for "Transforming Teaching" and "Family and Community Engagement".

U.S. Department of Education

Student Loans Grants Laws Data

LAWS & GUIDANCE / GRANTS & CONTRACTS

Education Department General Administrative Regulations (EDGAR) and Other Applicable Grant Regulations

Title 34, Code of Federal Regulations (CFR), Parts 75-79, 81 to 86 and 97-99 EDGAR is currently in transition. For awards made prior to 12/26/2014, EDGAR Parts 74 and 80 still apply. For awards made on or after 12/26/2014, 2 CFR Part 200, which includes the substance formerly in parts 74 and 80, applies.

For more information on the transition to 2 CFR Part 200, see the [Uniform Guidance Technical Assistance for Grantees](#)

You can view current versions of the EDGAR Parts of Title 34 at the [e-CFR website](#), a regularly updated, unofficial, non-legal edition of the CFR, created in a partnership between the Office of the Federal Register and the Government Printing Office. The e-CFR links for most of EDGAR are given below. Parts 74 and 80 are only found on the Government Printing Office site for annual CFRs.

How Do I Find...

- Student loans, forgiveness
- College accreditation
- Every Student Succeeds Act (ESSA)
- FERPA
- FAFSA
- 1098, tax forms

More >

Information About...

- Transforming Teaching
- Family and Community Engagement



U.S. Department of Education

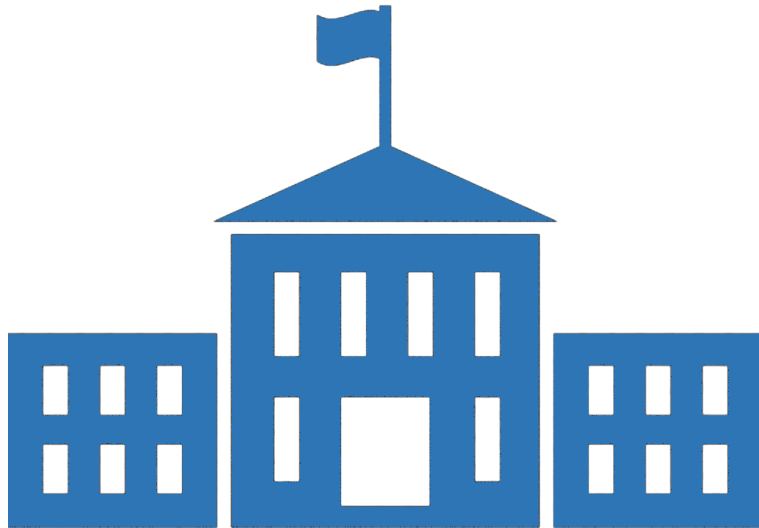
Examples of other EDGAR Requirements

- Obligation of Funds
- Time and Effort

Title I, Part A Use of Funds

Checklist

- ☐ Comprehensive Needs Assessment & Campus Improvement Plan
- ☐ Supplement, Not Supplant Methodology
- ☐ EDGAR Requirements
- ☒ LEA Policies and Procedures
- ☐



Examples (Not A Comprehensive List)

- Board Policy
 - Accounting Procedures
 - Manual Policies and Procedures
 - Internal Controls Procedures
 - Travel Procedures
- Required to be Followed**

Title I, Part A Use of Funds

Checklist

- ☐ Comprehensive Needs Assessment & Campus Improvement Plan
- ☐ Supplement, Not Supplant Methodology
- ☐ EDGAR Requirements
- ☐ LEA Policies and Procedures
- ☒ Additional Requirements

Additional Use of Funds Requirements

Title I, Part A

Ensure that activities and/or resources are...

Reasonable

Allocable

Necessary – Intent and Purpose

Allowable

Additional Use of Funds Requirements

Title I, Part A

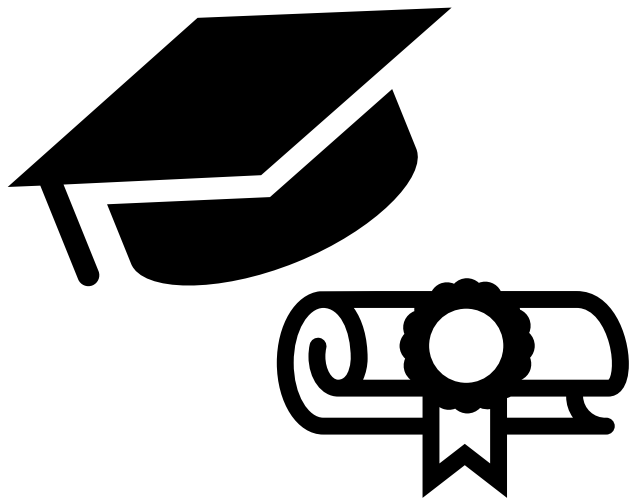
Ensure that activities and/or resources are...Reasonable & Necessary

- Objectives of the Program
- Prudent Business Practice
- Follow LEA's Documented Purchasing Procedures (meet EDGAR requirements)

Additional Use of Funds Requirements

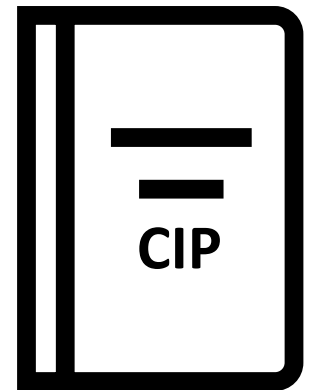
Title I, Part A

Ensure that activities and/or resources are...Reasonable & Necessary



“To provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.”

[Section 1001]



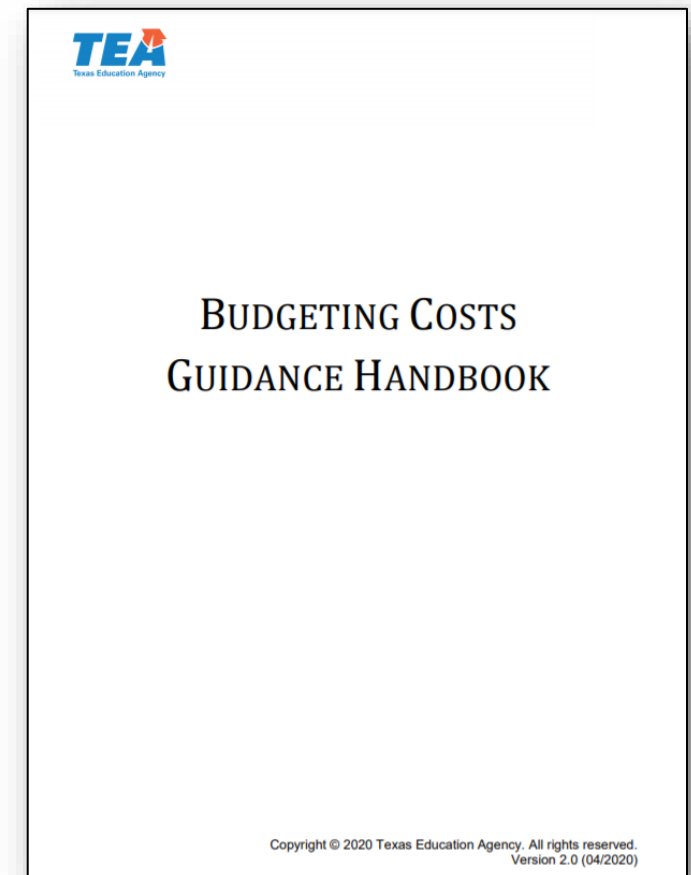
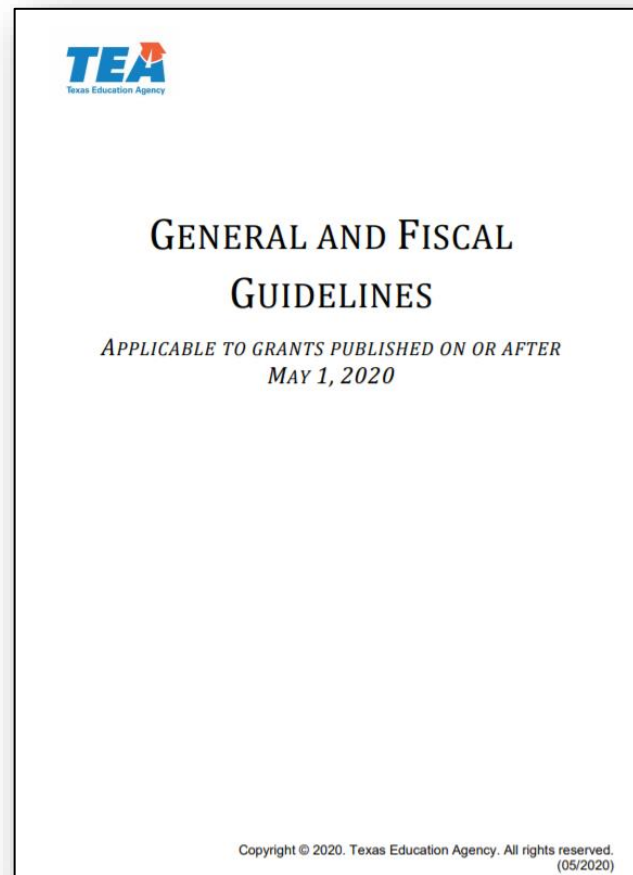
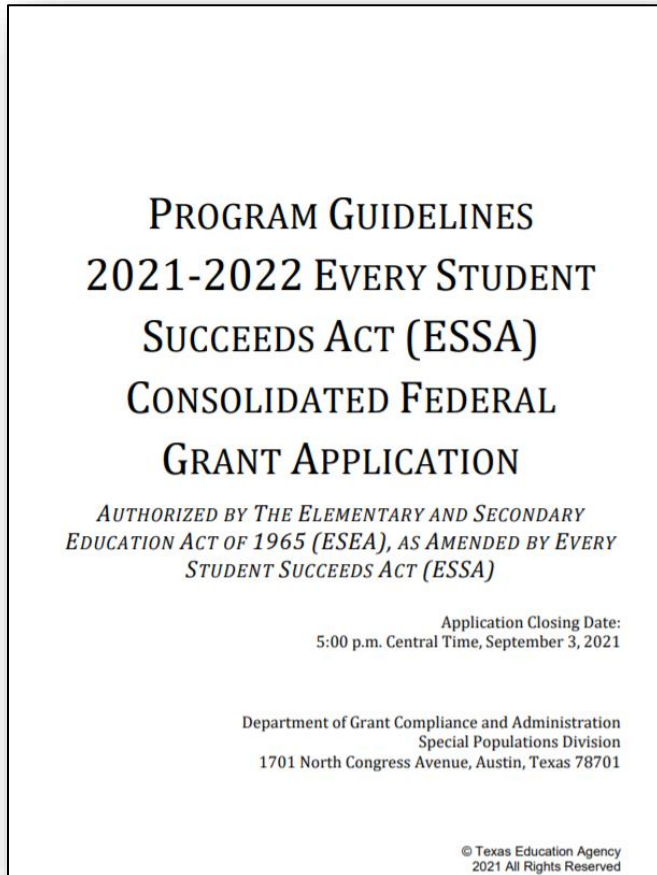
Additional Use of Funds Requirements

Title I, Part A

Ensure that activities and/or resources are...Allocable

- Title I, Part A Schoolwide Campuses
- Title I, Part A Targeted Assistance Campuses
- LEA Reserved Funds

Ensure that activities and/or resources are...Allowable



Allowable and Unallowable Use of Title I, Part A Funds

Title I, Part A Use of Funds General Allowability

PROGRAM GUIDELINES
2021-2022 EVERY STUDENT
SUCCEEDS ACT (ESSA)
CONSOLIDATED FEDERAL
GRANT APPLICATION

*AUTHORIZED BY THE ELEMENTARY AND SECONDARY
EDUCATION ACT OF 1965 (ESEA), AS AMENDED BY EVERY
STUDENT SUCCEEDS ACT (ESSA)*

Application Closing Date:
5:00 p.m. Central Time, September 3, 2021

Department of Grant Compliance and Administration
Special Populations Division
1701 North Congress Avenue, Austin, Texas 78701

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Field Trips

If the LEA plans to use Title I, Part A funds for field trips, the LEA will be required to complete the appropriate TEA justification form(s) and retain the documentation at the local level. The LEA must keep and maintain this form so that it may be provided to an independent auditor or to TEA monitors if the LEA is selected for a review.

Title I, Part A Use of Funds General Allowability



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Out-of-State Travel

Out-of-state travel costs are allowable; however, they should be minimal, reasonable and necessary to meet the intent and purpose of the Title I, Part A program. LEAs must retain documentation that participation of an individual in a conference is necessary for the project. Travel costs are allowable as long as the expenses for transportation, lodging, subsistence, and related items are only incurred by employees on official business of the grantee and follow the grantee's regular business operations and written travel policy. If you plan on using Title I, Part A funds for out-of-state travel, you will be required to complete the appropriate TEA justification form(s) and retain the documentation at the local level. You must keep and maintain this form so that it may be provided to your independent auditor or to TEA monitors if your LEA is selected for a review.

Title I, Part A Use of Funds General Allowability



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Unallowable: Advisory Council

An advisory council may not be funded under the grant program.

Exception: An Advisory Council is allowed under Title I, Part A Parent and Family Engagement. The LEA may establish a districtwide parent advisory council to provide advice on all matters related to parental involvement.

Title I, Part A Use of Funds General Allowability



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Unallowable: Cost of Membership in Any Civic or Community Organization

The cost of membership in any civic or community organization may not be funded under the grant program.

Title I, Part A Use of Funds General Allowability



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2021-2022 EVERY STUDENT
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Unallowable: Hosting or Sponsoring Conferences

Conferences may not be hosted or sponsored under the grant program until further guidance is available from USDE.

Title I, Part A Use of Funds General Allowability



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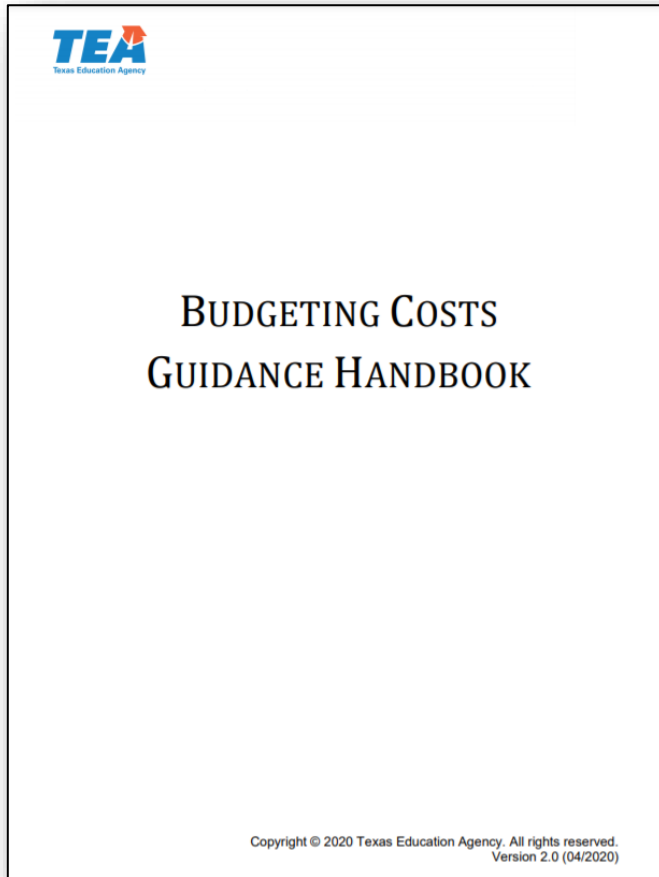
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Unallowable: Travel Costs for Officials such as Executive Director, Superintendent, or Board Members

Travel costs for officials such as the executive director, superintendent, or board members may not be funded under the grant program until further guidance is available from USDE.

Title I, Part A Use of Funds General Allowability



Unallowable Payroll Costs (6100)

The following employee payroll costs are not allowed:

- Personal liability insurance
- Employer contributions to voluntary retirement plans such as 403(b) or 401(k)
- Substitute pay for private nonprofit schoolteachers
- Payroll costs that exceed local policy

Title I, Part A Use of Funds General Allowability



BUDGETING COSTS GUIDANCE HANDBOOK

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Version 2.0 (04/2020)

Unallowable Professional and Contracted Services (6200)

A consultant shall not be used in the conduct of the award if the services to be rendered by such consultant could have been rendered by the subgrantee's employees.

Grant funds may not be used for the following:

- Training or technical assistance on grant writing or obtaining grant funds
- Fundraising activities or training on fundraising
- Multicolor printing costs that are not reasonable and necessary to accomplish the objectives of the grant program (applies to printing costs incurred under 6200 and 6400)
- Legal retainer fees
- Tuition and fees for courses not directly related to the grant program



BUDGETING COSTS GUIDANCE HANDBOOK

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Unallowable Professional and Contracted Services (6200) - Continued

Grant funds may not be used for the following:

- New building construction or renovating or remodeling of buildings
- Conducting required annual audit and report of financial activities
- Audit fees and expenses for state-funded grants
- Audit fees and expenses when such costs are part of the organization's indirect cost pool

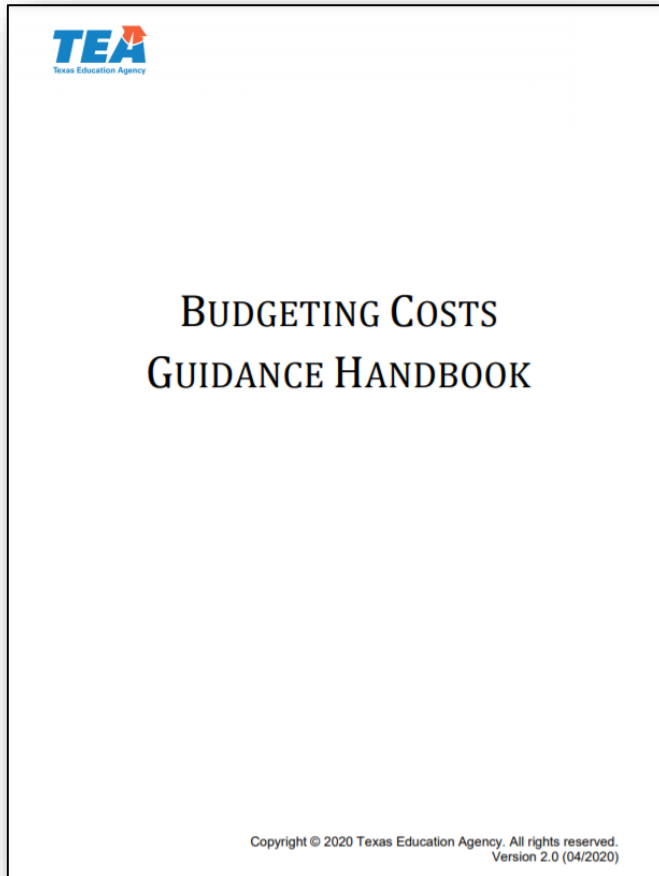


Unallowable Supplies and Materials (6300)

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.



Title I, Part A Use of Funds

General Allowability



BUDGETING COSTS GUIDANCE HANDBOOK

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Unallowable Other Operating Costs (6400)

Grant funds may not be used for the following:

- Out-of-state training when the same type and quality of training is available in state
- Gifts or items that can be construed as a gift
- Souvenirs, memorabilia, or promotional items (such as T-shirts, caps, tote bags, key chains, or imprinted pens)
- Door prizes (movie tickets, gift certificates, amusement park passes, and other similar items may be donated by others, but not purchased with grant funds)
- Food, meals, snacks, beverages, and refreshments as awards

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



BUDGETING COSTS GUIDANCE HANDBOOK

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Unallowable Other Operating Costs (6400) - Continued

Grant funds may not be used for the following:

- Advertising and public relations costs for any activities, services, or events other than those described in the Costs That Do Not Require Specific Approval section of this handbook
- Multicolor printing costs that are not reasonable and necessary to accomplish the objectives of the grant program
- Membership dues or fees for organizations substantially engaged in lobbying
- Membership dues or fees for social organizations
- Professional or personal liability insurance for individual employees
- Tuition and fees for courses not directly related to the grant program

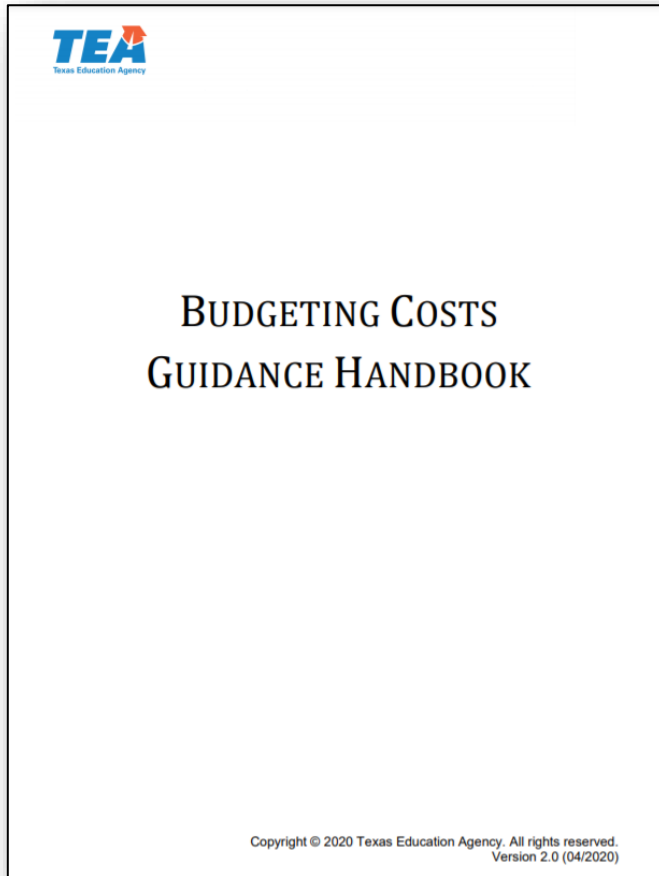
Title I, Part A Use of Funds

General Allowability



Unallowable Travel Costs

- Alcoholic beverages
- Tips or gratuities
- Entertainment, recreation, or social events
- Travel allowances, where per diem is paid to the employee regardless of the amount actually expended
- First-class airfare
- Any expense for other persons
- Meals and lodging for persons who live in the same city or town where the meeting, conference, or workshop is held
- Costs that are not reasonable and necessary to meet the objectives of the grant
- Costs related to training or technical assistance on grant writing or obtaining funds
- Field trips that do not meet the guidelines established by TEA (Refer to the Other Specific Items of Cost section of this handbook for guidance related to field trips)





BUDGETING COSTS GUIDANCE HANDBOOK

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Unallowable Capital Outlay (6600)

Unless specifically permitted in the authorizing statute and approved by TEA in the grant application, the following costs are unallowable:

- Land purchase and improvements to land
- Construction, renovation, or remodeling
- Ground leveling, site preparation, foundation, plumbing, wiring, and sidewalk for a portable building are considered construction costs. Therefore, these costs are unallowable to be charged to the grant.



Title I, Part A

Use of Funds Scenarios

Title I, Part A Use of Funds

Can we do _____
with our Title I, Part A
funds?



It depends...

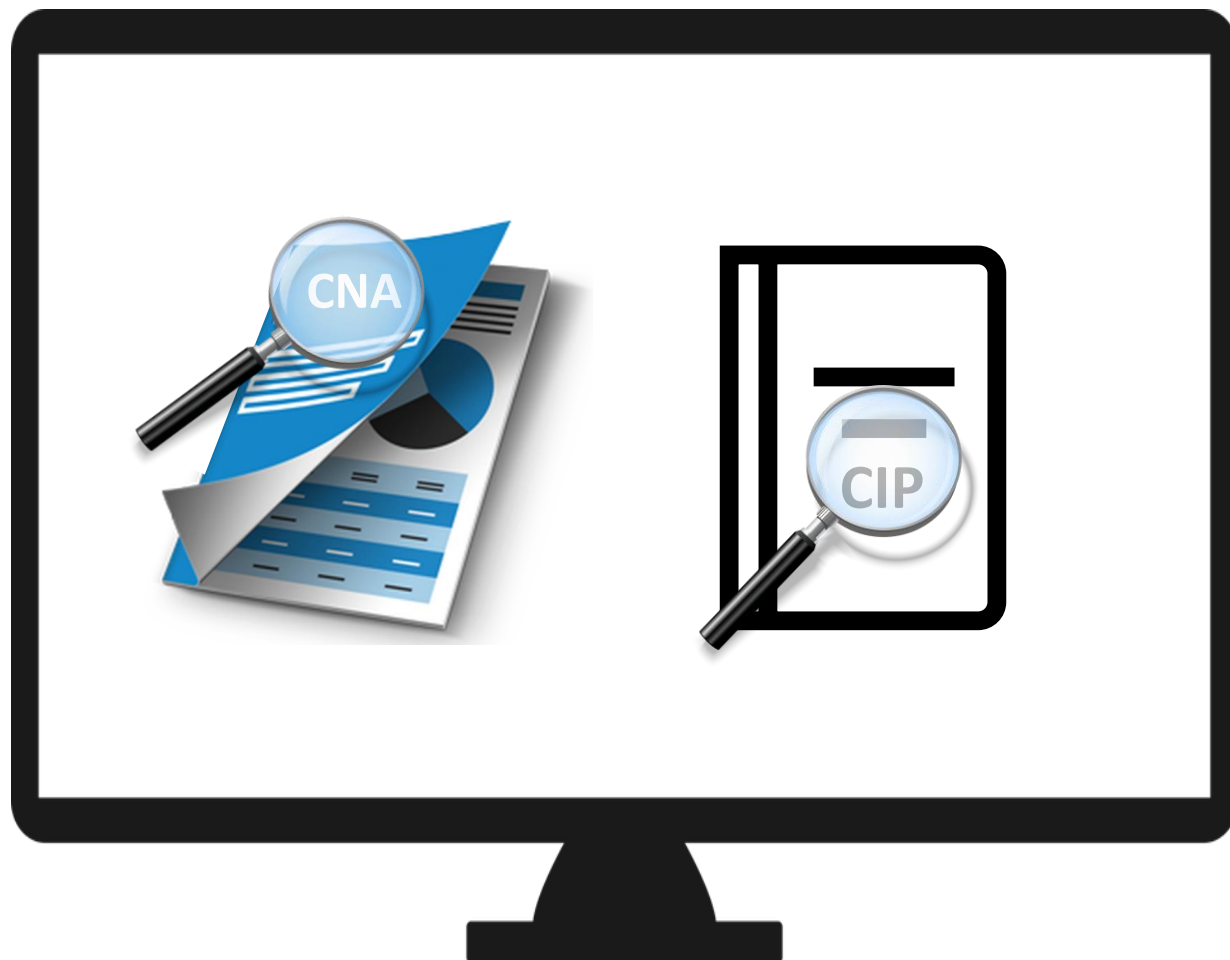


Note: The Scenarios provided in this training are to be used as examples. Please note that in analyzing the scenarios to see if they meet Use of Funds requirements, several items are assumed since we are considering their allowability outside of an LEA's policies and procedures for training purposes. Each LEA must make these allowability determinations for itself, based on its specific circumstances and their own policies and procedures.

Scenario 1 – Title I, Part A Use of Funds

Extra-duty pay for teachers on a schoolwide program campus to attend State-required Reading Academies professional development outside of their normal contract days/working hours (i.e. during the summer, on weekends, in the evenings)

Scenario 1



Title I, Part A Use of Funds

Checklist



**Comprehensive Needs Assessment &
Campus Improvement Plan**



Supplement, Not Supplant Methodology



EDGAR Requirements



LEA Policies and Procedures



Additional Requirements

Supplement, Not Supplant

In this scenario, the LEA has a valid SNS Methodology for allocating State and local funds to campuses.

Title I, Part A Use of Funds

Checklist

- ☒ Comprehensive Needs Assessment & Campus Improvement Plan
- ☒ Supplement, Not Supplant Methodology
- ☐ ? EDGAR Requirements
- ☐ ? LEA Policies and Procedures
- ☐ ? Additional Requirements

Scenario 1 – Title I, Part A Use of Funds

Extra-duty pay for teachers on a schoolwide program campus to attend State-required Reading Academies professional development outside of their normal contract days/working hours (i.e. during the summer, on weekends, in the evenings)

A graphic of a spiral-bound notebook with a white cover and a silver metal spiral binding on the left side. The notebook is open, showing a white page with black text. The text is organized into sections, with the title "Payroll Cost EDGAR Items" at the top, followed by "Obligation of Funds", "Time and Effort Documentation", and "Internal Controls".

Payroll Cost EDGAR Items

Obligation of Funds

Time and Effort Documentation

Timesheet of extra duties performed and a supplemental pay agreement approved by the supervisor for specific services provided that are eligible under the federal program

Internal Controls

EDGAR

- PAYROLL -

Obligation of Funds ✓

Time and Effort Documentation ✓

Internal Controls ✓

Title I, Part A Use of Funds

Checklist

- ☒ Comprehensive Needs Assessment & Campus Improvement Plan
- ☒ Supplement, Not Supplant Methodology
- ☒ **EDGAR Requirements**
- ☐ ? LEA Policies and Procedures
- ☐ ? Additional Requirements

Scenario 1 – Title I, Part A Use of Funds

Extra-duty pay for teachers on a schoolwide program campus to attend State-required Reading Academies professional development outside of their normal contract days/working hours (i.e. during the summer, on weekends, in the evenings)

A graphic of a spiral-bound notebook is positioned on the right side of the slide. The notebook has a white cover and a silver spiral binding on the left. The pages are white and contain text. The top page is titled "LEA Policies & Procedures" in green. The bottom page is titled "Extra-Duty Pay Procedures" in black. The notebook is shown from a slightly elevated angle, giving it a three-dimensional appearance.

LEA Policies & Procedures

Extra-Duty Pay Procedures

Documentation to Support LEA Policies and Procedures

LEA Policies and Procedures

**Extra-Duty Pay Procedures ✓
Documentation to Support
LEA Policies and
Procedures ✓**

Title I, Part A Use of Funds

Checklist

- ☒ Comprehensive Needs Assessment & Campus Improvement Plan
- ☒ Supplement, Not Supplant Methodology
- ☒ EDGAR Requirements
- ☒ **LEA Policies and Procedures**
- ☐ ? Additional Requirements

Scenario 1 – Title I, Part A Use of Funds

Extra-duty pay for teachers on a
schoolwide program campus to attend
State-required Reading Academies
professional development outside of
their normal contract days/working
hours (i.e. during the summer, on
weekends, in the evenings)

A graphic of a spiral-bound notebook with a white cover and a silver spiral binding on the left side. The notebook is open, showing a white page with text. The text is color-coded and formatted to match the main slide content.

Additional Requirements

Reasonable – Rate of Pay

Necessary – Intent and Purpose

**Allocable – Title I, Part A Served
Campus**

**Allowable – Program Guidelines,
Fiscal Guidelines and Budgeting
Costs Handbook**

Additional Requirements

Reasonable ?

Necessary ✓

Allocable ✓

Allowable ✓

(TEA Budgeting Costs Handbook)

Title I, Part A Use of Funds

Checklist

- ☒ Comprehensive Needs Assessment & Campus Improvement Plan
- ☒ Supplement, Not Supplant Methodology
- ☒ EDGAR Requirements
- ☒ LEA Policies and Procedures

☐ **?** Additional Requirements

Scenario 1 Summary

Extra-duty pay for teachers on a schoolwide program campus to attend State-required Reading Academies professional development outside of their normal contract days/working hours (i.e. during the summer, on weekends, in the evenings)

Title I, Part A Use of Funds

Checklist

- ☒ Comprehensive Needs Assessment & Campus Improvement Plan
- ☒ Supplement, Not Supplant Methodology
- ☒ EDGAR Requirements
- ☒ LEA Policies and Procedures
- ☐ ? Additional Requirements

Scenario 1 – What if?

Extra-duty pay for teachers on a **targeted assistance program campus** to attend State-required Reading Academies professional development outside of their normal contract days/working hours (i.e. during the summer, on weekends, in the evenings)

-Teachers serving Targeted Assistance Students (multiple, educationally related, objective criteria)

Title I, Part A Use of Funds

Checklist






- ☒ Comprehensive Needs Assessment & Campus Improvement Plan
- ☒ Supplement, Not Supplant Methodology
- ☒ EDGAR Requirements
- ☐ ? LEA Policies and Procedures
- ☐ ? Additional Requirements

Scenario 1 – What if?

Use LEA reserved funds for Districtwide Professional Development for extra-duty pay for teachers across the District to attend State-required Reading Academies professional development outside of their normal contract days/working hours (i.e. during the summer, on weekends, in the evenings)

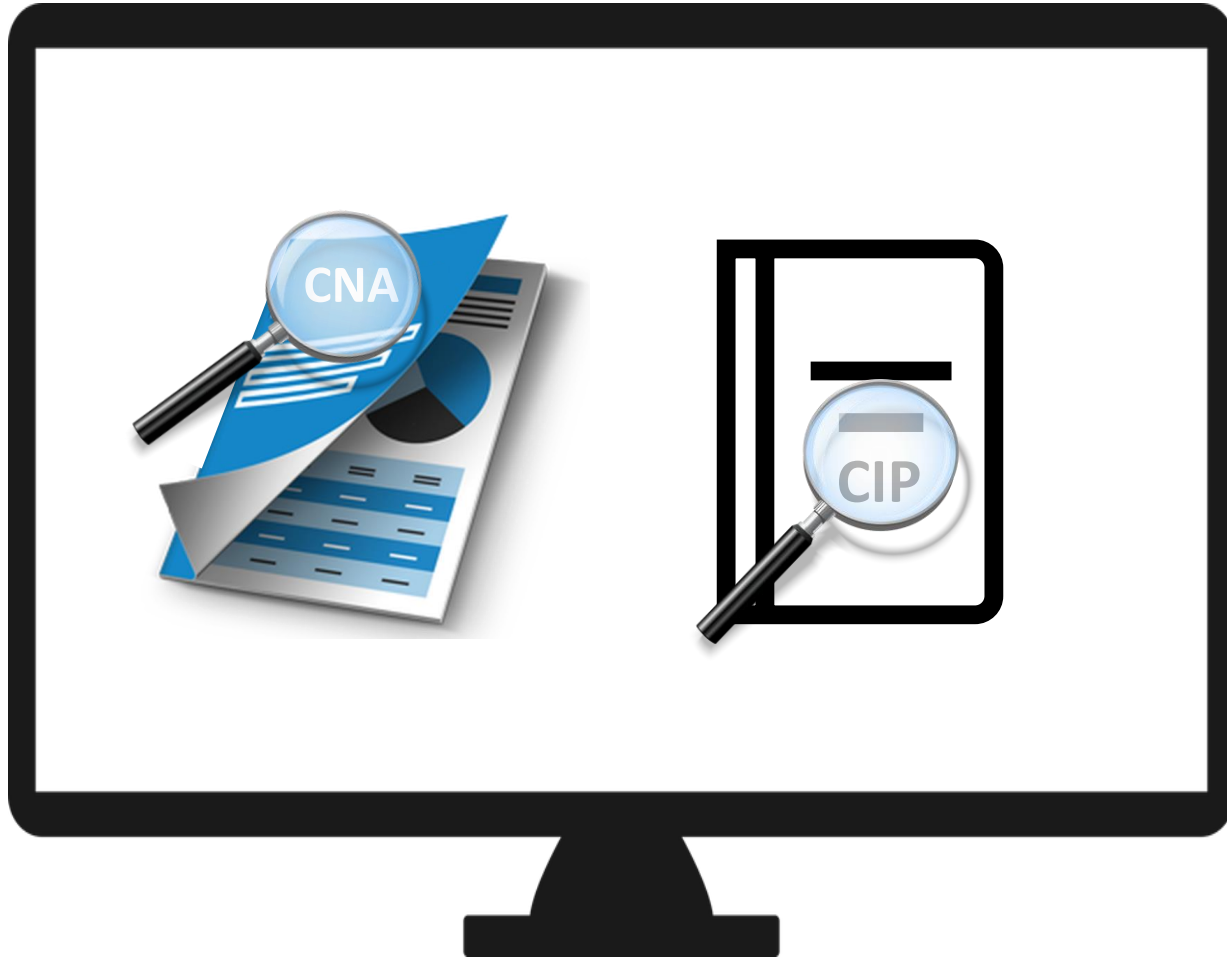
Title I, Part A Use of Funds

Checklist

-  Comprehensive Needs Assessment & Campus Improvement Plan
-  Supplement, Not Supplant Methodology
-  EDGAR Requirements
-  LEA Policies and Procedures
-  Additional Requirements

Scenario 2 – Title I, Part A Use of Funds

Use campus funds to contract with an online tutoring service provider to provide online tutoring in reading for Title I, Part A students at a targeted assistance campus because the LEA likes the vendor. Tutoring hours will be purchased up front and if there are hours left over at the end of the year, they will be carried over into the next year.



Title I, Part A Use of Funds

Checklist

- ☒ Comprehensive Needs Assessment & Campus Improvement Plan
- ☐ ? Supplement, Not Supplant Methodology
- ☐ ? EDGAR Requirements
- ☐ ? LEA Policies and Procedures
- ☐ ? Additional Requirements

Supplement, Not Supplant

In this scenario, the LEA has a valid SNS Methodology for allocating State and local funds to campuses.

Title I, Part A Use of Funds

Checklist

- ☒ Comprehensive Needs Assessment & Campus Improvement Plan
- ☒ Supplement, Not Supplant Methodology
- ☐ ? EDGAR Requirements
- ☐ ? LEA Policies and Procedures
- ☐ ? Additional Requirements

Scenario 2 – Title I, Part A Use of Funds

Use campus funds to contract with an online tutoring service provider to provide online tutoring in reading for Title I, Part A students at a targeted assistance campus **because the LEA likes the vendor.** Tutoring hours will be purchased up front and if there are hours left over at the end of the year, they will be carried over into the next year.

A graphic of a spiral-bound notebook is positioned on the right side of the slide. The notebook has a silver metal spiral binding on the left edge. The pages are white and contain text in different colors. The top page is visible and shows the following text:

Contracted Services
EDGAR Items

Procurement

Obligation of Funds

Procurement

Obligation of Funds

EDGAR
- **CONTRACTED SERVICES –**

Procurement ✕

Obligation of Funds ✕

Title I, Part A Use of Funds

Checklist

- ☒ Comprehensive Needs Assessment & Campus Improvement Plan
- ☒ Supplement, Not Supplant Methodology
- ☒ **EDGAR Requirements**
- ☐ ? LEA Policies and Procedures
- ☐ ? Additional Requirements

Scenario 2 – What if?

Use campus funds to contract with an online tutoring service provider to provide online tutoring in reading for Title I, Part A students at a targeted assistance campus. The appropriate procurement procedures will be followed. The LEA will prepay the online tutoring hours with other funds (local or state). When the hours are used, the LEA will then reimburse the local/state fund accounts with the federal funds. If tutoring hours are not used in the current grant year and carried over into the next grant year, the LEA will follow the same process and use funds from that particular grant year. The LEA will use the next year's grant funds to pay for any hours that were carried over into the next year.

Title I, Part A Use of Funds

Checklist

- ☒ Comprehensive Needs Assessment & Campus Improvement Plan
- ☒ Supplement, Not Supplant Methodology
- ☒ EDGAR Requirements
- ☐ LEA Policies and Procedures
- ☐ Additional Requirements

Most Frequently Asked Use of Funds

Frequently Asked Questions – Use of Funds



TITLE I, PART A—IMPROVING BASIC PROGRAMS

PROGRAM GUIDE

Federal Program Compliance Division
Department of Grant Compliance and Administration
(512) 463-9499
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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](#)

[November 2020 – January 2021](#)

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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](#)
- [Stakeholders](#)
- [Targeted Assistance Program](#)
- [Use of Funds](#)

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

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Note: The most frequently asked use of funds samples provided in this training are to be used as examples. Please note that in analyzing the samples to see if they meet Use of Funds requirements, several items are assumed since we are considering their allowability outside of an LEA's policies and procedures for training purposes. Each LEA must make these allowability determinations for itself, based on its specific circumstances and their own policies and procedures.

Title I, Part A Use of Funds – Payroll Costs



Salaries



Stipends



Extra-Duty Pay

Title I, Part A Use of Funds

Payroll Costs

Salaries

First → Use of Funds One-Page Reference Sheet

LEA Positions

- ***Intent and Purpose of Title I, Part A***
 - ***Job Duties***
- ***Comprehensive Needs Assessment & District Improvement Plan***
- ***LEA Reservation (Program Administration, Professional Development, etc.)***
- ***LEA Reservation (Parent and Family Engagement [PFE])***
 - ***LEA PFE Policy***
- ***Supporting Schoolwide Campuses***
- ***Supporting Targeted Assistance Campuses***
- ***Time and Effort***
- ***Job Description***



Title I, Part A Use of Funds

Payroll Costs

Salaries

First → Use of Funds One-Page Reference Sheet



Campus Positions

- ***Intent and Purpose of Title I, Part A***
 - ***Job Duties***
- ***Comprehensive Needs Assessment & Campus Improvement Plan***
- ***Parent and Family Engagement (PFE)***
 - ***Campus PFE Policy***
- ***Schoolwide Campus***
- ***Targeted Assistance Campus***
- ***Time and Effort***
- ***Job Description***

Title I, Part A Use of Funds

Payroll Costs

Stipends

First → Use of Funds One-Page Reference Sheet



- ***Intent and Purpose of Title I, Part A***
- ***Time and Effort***
- ***Schoolwide Campus vs. Targeted Assistance Campus***
- ***Based on LEA Adopted Policies and Procedures***
 - ***Graduate degrees example***
- ***Documentation***
 - ***Authorization of Stipend by Supervisor***

Title I, Part A Use of Funds

Payroll Costs

Extra-Duty Pay

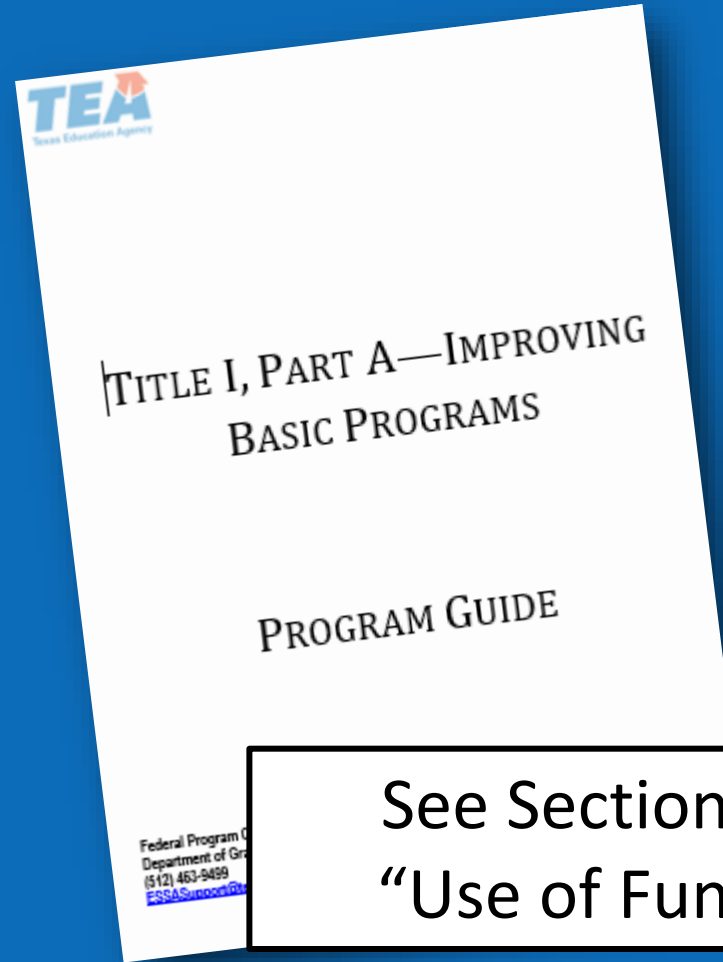
First → Use of Funds One-Page Reference Sheet



- ***Intent and Purpose of Title I, Part A***
 - ***Services provided are eligible under Title I, Part A***
- ***Time and Effort***
- ***Schoolwide Campus***
- ***Targeted Assistance Campus***
- ***Based on LEA Adopted Policies and Procedures***
- ***Documentation***
 - ***Time Sheet of Extra Duties Performed***
 - ***Supplemental Pay Agreement Approved by Supervisor***

Use of Funds


Information about requirements for Title I, Part A Use of Funds is available.



See Section on
“Use of Funds”

Title I, Part A Resources

TEA Title I, Part A – Improving Basic Programs Web Page - Resources



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Title I, Part A Use of Funds

Statutory Reference


Section 1118(b)(1) An LEA shall use Federal funds received under this part only to supplement the funds that would, in the absence of such Federal funds, be made available from State and local sources for the education of students participating in programs assisted under this part, and not to supplant such funds.

These are the steps and requirements for using Title I, Part A funds.

1. The campus in question must be a Title I, Part A campus.
2. LEAs must have a valid Supplement Not Supplant methodology for allocating State and local funds to campuses, or Statement of Exemption.
[In both situations, the LEA must also ensure that State and local funds that are reserved at the LEA level are used to support activities that do not take the Title I status of campuses into account. Any Title I, Part A funds that are reserved at the LEA level must be used for activities that meet the intent and purpose of Title I, Part A, as well as items 3-5, below.]
3. LEAs should ensure that activities and/or resources are:
 - Identified in the Comprehensive Needs Assessments;
 - Included in the Campus Improvement Plan;
 - The plan addresses how the activity/resource identified will be evaluated; and
 - The plan addresses how the needs of students at risk of not meeting State Standards are being met.
 - Reasonable;
 - Necessary to carry out the intent and purpose of the Title I, Part A program;
 - Allocable; and
 - Allowable under Title I, Part A
4. The LEA assures that the expenditure(s) meet all EDGAR requirements.
5. The LEA assures that all district policies and procedures were followed.

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TITLE I, PART A—IMPROVING
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Title I, Part A - Frequently Asked Questions

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

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- [Targeted Assistance Program](#)
- [Use of Funds](#)

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?

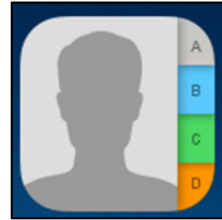
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