

Department of Grant Compliance and Administration

Statewide Training Series

Questions & Answers

Training Title: Title I, Part A Within-LEA Allocations and 2021-2022 SC5000 Title I, Part A Campus Selection Schedule

Training Date: 06/09/2021

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

Q1: If an LEA uses PEIMS snapshot data to get their enrollment numbers and they want to pull their low-income numbers (economically disadvantaged) from there, which codes would they use? For example: 01- eligible for free meals under the NSLP, 02- eligible for reduced-price meals under the NSLP, and 99-other economically disadvantaged. Would they just use the number of students coded as 01 & 02 or would they also include 99 since some use 99 for students who qualify as economically disadvantaged but are not direct certified?

A1: If the LEA uses a composite of National School Lunch Program (NSLP), Medicaid, and Temporary Assistance to Needy Families (TANF) data as their selected poverty measure, the LEA can choose to use students coded with a 99, in addition to 01 and 02, for their low-income percentage. The LEA would maintain documentation for students coded 01, 02, and 99.

Q2: What is the difference between residing and enrollment?

A2: Enrollment is the total number of students enrolled on a campus, based on the as-of date selected by the LEA. Residing is the number of students residing in the attendance area.

Q3: For the number of targeted assistance program students served, would the LEA report previous year students served, or an anticipated amount of students to be served for 21-22; or the number of students who qualify for services in 21-22 based on local criteria?

A3: The LEA would report the estimated number of students to be served on the Targeted Assistance campus.

Q4: If a campus is using direct certification as the basis of eligibility, is the percentage for low income 100% or the actual percentage?

A4: The actual percentage of low-income students should be used. Direct certification is selected only when the LEA is solely using direct certification data as a poverty measure. Keep in mind that the number of students directly certified is a subset of the total number of students eligible for free and reduced-priced meals.

- Q5: Do you have to amend if the actual numbers change from the estimated number of Targeted Assistance students entered when submitting the application?**
- A5: The LEA may amend the SC5000 if the actual numbers change from the estimated number of Targeted Assistance students entered when submitted the application.
- Q6: If campuses are closed in AskTED, how do we remove these campuses from the SC5000 Schedule?**
- A6: If the campuses are listed in AskTed, even if closed, they will always show up on the SC5000. For any closed campus, designate "0" for enrollment, "None" for the Basis of Eligibility, and "NS" for Campus Status.
- Q7: Charter Schools are not required to set aside money for private school equitable services, correct?**
- A7: That is correct.
- Q8: Can Title I, Part A funds that are reserved at the LEA level for foster care student transportation be used at non-Title I, Part A campuses?**
- A8: No. The only Title I, Part A LEA reserved funds that can be used for students at non-Title I, Part A campuses are those funds reserved at the LEA level for services to homeless students.
- Q9: If the campus with the highest number and percentage of low-income students is a high school, can an LEA "skip" that campus and only serve the elementary schoolwide program-eligible campuses?**
- A9: Yes. For LEAs with a total enrollment of 1,000 or more students, a campus is identified as a skipped campus in the following situations: 1) A campus has a low-income percentage over 75% and is not served. 2) Another campus with the same grade span and a lower low-income percentage is served. The LEA confirms by submission of its application that skipped campus(es) 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 to the campus under Title I, Part A.
- Q10: If an LEA redirects funds into Title I, Part A from Title II, Part A and Title IV, Part A through the Rural Education Achievement Program (REAP) which then makes its Title I, Part A allocation over \$500,000, does the LEA at that point need to make the required 1% parent and family engagement reservation?**
- A10: Redirected funds through REAP is not indicated on the PS3101 (only funds transferred through Funding Transferability). Thus, if the LEA redirects funds through REAP that will not affect the Parent and Family Engagement requirement if the amount is over \$500,000. However, if the LEA transfers funds into Title I, Part A from Title II, Part A and/or Title IV, Part A through Funding

Transferability which causes the LEA Title I, Part A allocation to exceed \$500,000, they will be required to reserve at least 1% for parent and family engagement activities.

Q11: What percentage should be reserved for homeless and foster care transportation?

A11: The reservation for services to homeless students reservation is required by all LEAs, regardless of the Title I status of their campuses. 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. If an LEA chooses to reserve funds for foster care transportation, the LEA is required to reserve a minimum of \$100.

Q12: Please clarify what is meant by LEAs with less than 1,000 students being exempt from using poverty measures. What might that look like and how would it be reported on the SC5000?

A12: LEAs with less than 1,000 students are still required to complete the SC5000 and are to maintain documentation locally that shows how they chose to allocate funds to their campuses. Such an LEA may use other criteria, such as academic performance or the grade span of its schools to determine which of its schools receive Title I funds, or it may choose to allocate Title I funds to all its schools.

Q13: What are some examples of allowable expenditures with Title I, Part A funds reserved at the LEA level for administration of Title I, Part A programs?

A13: Such costs may include payroll costs associated with the role of the person or persons that manage and administer the Title I, Part A program.

Q14: Is an LEA required to rank and serve campuses if there is only one campus per grade span with no overlapping grade levels?

A14: If the LEA has less than 1,000 students, the LEA is not required to rank campuses. Such an LEA may use other criteria, such as academic performance or the grade span of its schools to determine which of its schools receive Title I funds, or it may choose to allocate Title I funds to all its schools. If the LEA has 1,000 or more students, the LEA is required to follow the rank and serve process for allocating funds to their campuses.

Q15: In the ranking example, two of the campuses were Title I, Part A eligible because they had at least a 35% low-income percentage. Would those campuses implement a targeted assistance program since the schoolwide program eligibility threshold is 40%?

A15: Since the campuses do not meet schoolwide program eligibility, they could implement a targeted assistance program.

Q16: On the SC5000, do we use the schoolwide status for schools who have gone through the schoolwide transition process and will be schoolwide in 2021-22?

A16: If the campus has completed the one-year schoolwide transition planning process, they are eligible to be served as a schoolwide campus. If they have not completed this process, the campus

must use another designation until the process is complete. The SC5000 may be amended to change that designation to SW upon completion of the planning process.

Q17: Is foster care transportation an allowable activity to be conducted with Title I, Part A funds that have been reserved at the LEA level?

A17: Yes, foster care transportation is listed on the PS3101 as one of the activities that can be conducted with reserved funds.

Q18: Please describe more about Direct Certification. What is required? Multiplier?

A18: Direct Certification can be a complex process for LEAs that have CEP and non-CEP campuses. That is when the multiplier is required. Appendix A of the following document provides additional information about the multiplier. <https://www2.ed.gov/policy/elsec/leg/essa/within-district-alloc-guid-draft-for-public-comment-3112020.pdf> Please reach out via email to ESSASupport@tea.texas.gov if you have questions related to the process.

Q19: If a district has less than 100 students, do they still have to determine per-pupil allocations?

A19: An LEA with an enrollment of fewer than 1,000 students is exempt in statute from having to use the poverty measures to determine which of its schools receive Title I funds. Such an LEA may use other criteria, such as academic performance or the grade span of its schools to determine which of its schools receive Title I funds, or it may choose to allocate Title I funds to all its schools. LEAs must maintain documentation of the per-pupil amounts used to determine Title I, Part A allocations.

Q20: What are the pros and cons of using grade span grouping versus straight rank and serve?

A20: Using grade span grouping for Title I, Part A eligibility could allow campuses to be Title I, Part A eligible that otherwise would not be eligible on their own. The same is true for schoolwide program eligibility. For campuses with a low-income percentage below 75%, the flexibility in grade span grouping could also allow an LEA to allocate Title I funds by grade span within each grade span and not across grade spans.

Q21: May a served campus with 74% poverty receive the same amount per pupil as those equal to or greater than 75% poverty? Or must the 74% campus receive an amount that is less?

A21: The LEA must ensure that it allocates Title I, Part A funds to its campuses with a poverty percentage above 75 percent first. If the LEA has funds remaining, the LEA has the discretion to allocate the remaining funds using a variety of methods. An LEA is not required to allocate the same per-pupil amount to each participating school. If an LEA allocates different per-pupil amounts to participating campuses, the LEA must allocate a per-pupil amount that is equal to or higher to campuses with higher poverty rates than it allocates to campuses with lower poverty rates.

Q22: Please clarify how an LEA with only one campus per grade span with no campuses above 35% should approach allocations.

A22: If the LEA chooses to serve any campus below 35% low-income, the 125% rule comes into effect. The 125% rule requires an LEA to allocate an amount for each low-income child in each participating Title I school that is at least 125 percent of the LEA's allocation per low-income child.

Q23: We have always skipped a campus based on the local/state funding allocated each year to them. With enrollment changes and programming changes, this campus no longer qualifies based on this year's numbers. Do we take this next year to set up a schoolwide program for them, thus they are not receiving Title I programming/funding until 2022-2023?

A23: If the campus is engaged in the one-year schoolwide transition process, the campus can choose to implement a targeted assistance program and thus receive Title I, Part A funding in 2021-2022.

Q24: Could you give an example of state and local funds that would meet the intent and purpose of Title I, Part A for the purposes of skipping a campus?

A24: State compensatory education funding is an example of supplemental state funds that could meet the intent and purpose of Title I, Part A for the purposes of skipping a campus.

Q25: If all of our campuses are below 35%, how are we supposed to allocate 125% to all of them?

A25: If the LEA chooses to serve any campus below 35% low-income, the 125% rule comes into effect. The 125% rule requires an LEA to allocate an amount for each low-income child in each participating Title I school that is at least 125 percent of the LEA's allocation per low-income child. The LEA would need to use the rank and serve process and may not be able to serve all eligible campuses if there are not enough funds. The intent of the 125% rule is to concentrate the Title I, Part A funds in campuses that have higher poverty percentages; it is not necessarily the intent that all campuses be served.

Q26: How does an LEA determine the amount of funds a campus will receive for Title I, Part A funding?

A26: The campus allocation is determined by the number of low-income students multiplied by the per-pupil amount. For example, if the per-pupil amount that is determined by the LEA for the campus is \$1,500 and the campus has a total of 250 students and 78% of the students come from low-income families, the number of low-income students would be 195. The LEA would determine the campus's allocation by multiplying 195 times \$1,500. The campus allocation would be \$292,500.

Q27: Is there a specific requirement for the date used to pull low-income data for eligibility?

A27: LEAs are required to use the same date for all campuses in the LEA. TEA does not collect that date; the LEA must maintain auditable documentation in case it is requested. For the year of data used to determine poverty counts of public schools, an LEA uses the most recently available data, which will be from the previous school year in most cases.

Q28: Can an LEA serve a campus that only enrolls prekindergarten students as a schoolwide campus?

A28: If the campus meets overall Title I, Part A eligibility requirements and schoolwide program eligibility requirements, an LEA can choose to serve a campus that only enrolls prekindergarten students. In determining overall Title I, Part A eligibility please note that the LEA must use the same poverty measure(s) for all its campuses, both for eligibility and for determining allocations. For example, the LEA likely wouldn't have Census low-income data for students ages 5-17 that would apply to a campus that only has pre-K students. Such an LEA would need to use another poverty measure for all its campuses.

Q29: How many times can a campus use the "schoolwide previous year" provision for implementing a schoolwide program on a campus that does not currently meet the 40% threshold?

A29: A campus can use the "Schoolwide Previous Year" provision and remain a schoolwide program until the campus is either schoolwide eligible on its own or is no longer Title I, Part A eligible and cannot be served.

Q30: With Title I, Part A funds, are we able to not allocate funds to a campus and instead use them at the LEA-level to hire a campus interventionist to support the campus?

A30: The LEA reservations process occurs prior to allocation of funds to campuses. Funds reserved at the LEA level should be used for LEA-wide Title I, Part A activities to benefit students at Title I, Part A served campuses. The campus would still need to be allocated funds based on the rank and serve process. If the campus in question did not receive a Title I, Part A campus allocation, the campus would not be considered a Title I, Part A served campus and thus, the LEA would not be able to use LEA reserved funds to provides services to the students on that campus.

Q31: Would it be accurate to say that if you choose to use "residing" numbers, you would have to remove students who are out-of-district transfers in order to get an accurate account of total students in LEA/campuses? Enrollment would account for ALL students regardless of whether they live within the LEA boundaries?

A31: That is correct.

Q32: What are the required Title I, Part A LEA reservations?

A32: An LEA that receives Title I funds must reserve a proportional share of those funds to provide equitable services to eligible children who attend a private school.

If the Title I, Part A LEA entitlement amount (includes funds transferred via Funding Transferability) is greater than \$500,000, the LEA must reserve at least 1% of funds for Districtwide Parent and Family Engagement Activities. The LEA must distribute at least 90% of its Districtwide Parent and Family Engagement reservation to its Title I schools, giving priority to high-need schools. For this purpose only, Texas defines 'high-need schools' as low-income schools with high percentages of students who do not meet the challenging State academic standards.

The Services to Homeless Students reservation is required by all LEAs, regardless of the Title I status of their campuses. 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.

ESSA also requires an LEA to reserve Title I, Part A funds to provide services comparable to those provided to children in Title I, Part A campuses to children in local institutions for neglected children.

Q33: Is staff development a required LEA reservation?

A33: Although an LEA can use Title I, Part A reserved funds for LEA-wide professional development activities, it is not a statutory required reservation.

Q34: Is it required that a campus be a targeted assistance program campus before transitioning to a schoolwide program campus?

A34: No. However, a campus implementing a schoolwide program must ensure that it has met all the statutory requirements for implementing a schoolwide program during the one-year planning process. 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.