### Frequently Asked Questions about Title I, Part A

VAFEPA Conference 2018



# How has the supplement not supplant provision changed under ESSA?



The statute requires an SEA or LEA to use Title I funds only to supplement the funds that would, in the absence of those Title I funds, be made available from state and local sources for the education of students participating in Title I programs, and not to supplant such funds. ESEA section 1118(b)(1)



#### Special Rule

According to the statute, no LEA shall be required to—

- Identify that an individual cost or service supported with Title I funds is supplemental; or
- Provide Title I services through a particular instructional method or in a particular instructional setting in order to demonstrate compliance.

The special rule applies to both schoolwide programs and targeted assistance programs.

ESEA section 1118(b)(3)



#### A Word of Caution

Consistent with the statute, if an LEA is required by law to provide funding to schools for a specific purpose, the LEA must provide such funds to Title I schools on the same basis as it provides such funds to non-Title I schools, subject to application of the "exclusion" provision.

This includes funds needed to provide services that are required by law for students with disabilities and English learners.

ESEA section 1114(a)(2)(B)



#### Exclusion of supplemental non-federal funds

Under the statute, an LEA may exclude from a supplanting determination *supplemental* non-federal funds expended in any school for programs that meet the intent and purposes of Title I.

ESEA section 1118(d)



# How will an LEA demonstrate implementation of the methodology?



Under the statute, to demonstrate compliance with the supplement not supplant requirement, an LEA must demonstrate that the methodology used to allocate State and local funds to its schools ensures that each Title I school receives all of the State and local funds it would otherwise receive if it were not receiving Title I funds. ESEA section 1118(b)(2)



- A methodology must be in place for the 2018-2019 school year.
- Excluded from Supplement not Supplant Methodology Test:
  - Single School LEAs
  - LEAs with only 1 school per grade span



#### Methodologies

The methodology must—

- Allocate state and local funds to schools in the LEA; and
- Provide each Title I school the state and local funds it would receive were it not a Title I school—i.e., be neutral regarding a school's Title I status.
- An LEA must be able to demonstrate compliance—i.e., that it has implemented its methodology.

# What is the Community Eligibility Provision (CEP) and how does it impact allocations to schools in the Title I, Part A, application?



### The Community Eligibility Program (CEP)

- Universal meal program designed by the National School Lunch Program
- Response to the Healthy, Hunger-Free Kids Act of 2010
- Implementation began in 2011-2012, with all states participating by the 2014-2015 school year
- Goal of providing more free meals to low-income students
- In each participating school, all students are provided free breakfast and free lunch



To be eligible, a school, group of schools, or LEA must have at least 40 percent of its students meet the definition below:

<u>Identified Students</u> are defined as students approved as eligible for free meals through means other than individual household applications. This definition includes students who are directly certified for free meals on the basis of their participation in the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF). It also includes *homeless students* on the liaison list, runaways, migrant youth, Head Start, Even Start and foster children approved by means other than a meal application. It does NOT include students who are categorically eligible based on information submitted on a free and reduced price application, such as a SNAP or TANK case number.

#### How does the multiplier work?



#### The Multiplier

- Used to account for low-income families not reflected/ captured in identified student count
- Determines percent of federal reimbursement for meals
- Set by USDA at 1.6
- Multiplier remains constant for schools and Local Educational Agencies (LEAs) throughout the four year CEP cycle



### How does CEP impact Title I school ranking?



- The LEA must use a common poverty metric to rank order schools and allocate Title I funds on an equitable basis
- If an LEA selects National School Lunch data as its poverty measure and participates in CEP, the CEP data will be used by the LEA for within-district allocations
- An LEA will not use CEP data for Title I school ranking until a school is in its second year implementing CEP (2015-2016 or later)



- Each school's data must be reported separately in the Title I, Part A, application for federal funds (not in a group or by division average, even if schools were grouped for CEP eligibility)
- The LEA or school <u>must</u> use updated direct certification data on an annual basis for Title I purposes, even if these data are not used for CEP purposes



## What are the three options for LEAs with both CEP and non-CEP schools?



#### Option #1 – Use the Multiplier for CEP Schools

School	Total Enrollment	Number of Directly Certified	Number of household application s	Apply Multiplier	Number of Low Income	Percen t Low- Income
School 1 CEP	100	60		1.6	96	96%
School 2 CEP	100	50		1.6	80	80%
School 3 Non-CE P	100	30	10		40	40%



#### **Option #2 – Use ONLY Direct Certification Data for ALL schools**

School	Total Enrollment	Number of Directly Certified	Number of household application s	Apply Multiplier	Number of Low Income	Percen t Low- Income
School 1 CEP	100	60			60	60%
School 2 CEP	100	50			50	50%
School 3 Non-CE P	100	30	100		30	30%

#### Option #3 — Use Direct Certification Data and the Multiplier for ALL schools

School	Total Enrollment	Number of Directly Certified	Number of household application s	Apply Multiplier	Number of Low Income	Percen t Low- Income
School 1 CEP	100	60		1.6	96	96%
School 2 CEP	100	50		1.6	80	80%
School 3 Non-CE P	100	30	1/2	1.6	48	48%

### How does CEP impact federal accountability?



- The CEP <u>identified students</u> definition will be used to identify the economically disadvantaged subgroup for accountability purposes in all CEP schools.
- Schools not participating in CEP will continue to use traditional methods for the identification of the economically disadvantaged subgroup for accountability purposes as allowed under Title I and that comply with the data elements outlined in the Student Record Collection (for example, student eligibility for Free/Reduced Meals, students receiving TANF, and students eligible for Medicaid).



### When do the Title I grants that are currently active expire?



### Carryover Timeline for FFY 2016 Funds

#### **Total Grant Award Period:**

July 1, 2016 to September 30, 2018

#### **Deadline to Obligate 85% of Award:**

September 30, 2017

**Deadline to obligate 100% of Award:** 

**September 30, 2018** 

**Deadline to Request Reimbursement for ALL Funds:** 

**November 15, 2018** 



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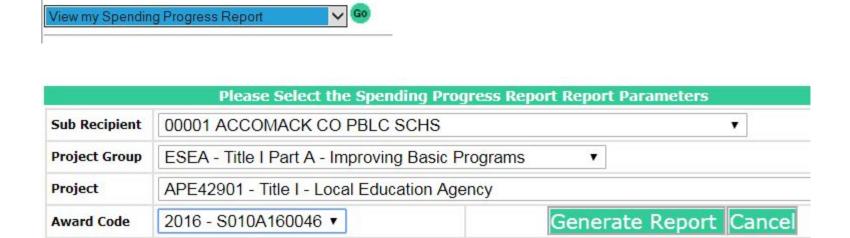
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#### **Spending Progress Report**

To check spending progress for reimbursing 100 percent of 2016 funds and encumbering 85 percent of 2017 funds, access the Spending Progress Report in OMEGA.





### What's new on the <u>Title I, Part</u> <a href="A website">A website</a>?



### How do I work for the Title I Team?



#### We have a vacancy!

Title I, Part A, Specialist Posting



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