



Title I, Part A Guidance

Improving the Academic Achievement of the Disadvantaged

Introduction

The purpose of Title I, Part A (Title I) of the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA), is to provide all children significant opportunity to receive a fair, equitable, and high-quality education and to close educational achievement gaps. Title I provides financial assistance to local educational agencies (LEAs) and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging state academic standards.

Required and Recommended Actions

LEAs that receive Title I funds must carry out a variety of activities to participate in the program. These activities include, but are not limited to:

- Reporting student achievement and other data to the state educational agency (SEA) and the public (ESEA Section 1111(h)),
- Notifying parents about issues such as teacher qualification, assessments, and identification of student as English learners (ESEA Section 1112(e)),
- Collaborating with child welfare agencies to ensure the educational stability of children in foster care (ESEA Section 1112(c)(5)(B)),
- Providing services to homeless children (ESEA Section 1113(c)(3)(A)(i) and 1113(c)(3)(C)),
- Providing services to children in local institutions for neglected children, and if appropriate, to children in local institutions for delinquent children, and neglected or delinquent children in community day programs (ESEA Section 1113(c)(3)(A)(ii)&(iii)),
- Allocating Title I funds to eligible schools through a poverty-based procedure known as “rank and serving” (ESEA Section 1113),
- Developing and implementing plans to support and improve low-performing schools identified by the state through its accountability system (ESEA Section 1111(d)),
- Developing policies and providing services to engage parents and families (ESEA Section 1116),
- Annually reviewing, revising, and evaluating the local schoolwide plans and targeted assistance plans (ESEA Sections 1114 and 1115),
- Providing services to eligible private school students (ESEA Section 1117), and
- Overseeing Title I activities in Title I schools (2 CFR 200.328(a)).

Supplement Not Supplant (ESEA Section 1118(b))

As with prior law, SEAs, AEsAs, LEAs, and schools must spend Title I funds to supplement and not supplant (SNS) their state and local education spending. In general terms, SNS means that Title I funds should add to (supplement) and not replace (supplant) state and local funds. However, ESSA’s method for testing compliance with this requirement is different than prior law.

Prior to ESSA, supplement not supplant was tested by analyzing an individual Title I cost’s compliance with “three presumptions of supplanting.” Under ESSA, compliance with SNS will no longer be tested through individual Title I costs. Instead, LEAs must demonstrate that the methodology they use to allocate state and local funds to schools and provide each Title I school with all of the state and local money it would receive if it did not participate in the Title I program (ESEA Section 1118(b)(2)). This should expand Title I’s options. Please note that every Title I cost must still be allowable and align with the purpose of the law.

Local Maintenance of Effort (ESEA Sections 1118(a) and 8521)

LEAs and AEAs that receive Title I and other ESSA funds must comply with maintenance of effort requirements. Maintenance of effort requires LEAs to maintain a consistent floor of state and local funding for free public education from year-to-year. A LEA is required to spend State and local funds with respect to the provision of free public education in the preceding fiscal year that was not less than 90% of the combined fiscal effort per student or aggregate expenditures for the second preceding fiscal year.

If the LEA fails to maintain effort in a given fiscal year, the SEA must reduce the LEA's allocation (using the measure most favorable to the LEA) under a covered program (ESEA Section 8521(b)(1)).

Comparability (ESEA Section 1118(c))

As a condition of receiving Title I funds, LEAs must ensure that state and local funds are used to provide services that, taken as a whole, are comparable between Title I and non-Title I schools. LEAs use October enrollment data to conduct the annual comparability analysis. LEAs need to make appropriate adjustments to staffing in Title I and Non-Title I schools if the analysis demonstrates an issue with comparability.

Equitable Services (ESEA Section 1117)

Title I funds are subject to an equitable services requirement. This means LEAs must reserve funds to provide Title I services to eligible private school students, teachers, and families. ESSA makes important changes and clarifications to the way LEAs must reserve Title I funds for equitable services. ESSA requires a LEA to determine the amount of funds available for providing services under Title I prior to any expenditure or transfer of funds (ESEA Section 1117(a)(4)). This includes all reservations previously taken "off the top" of a LEA's Title I allocation, including reservations for administration, parental involvement, and district-wide initiatives. For more information, see the [Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements Under ESEA, as amended by ESSA](#).

Allowable Activities

All costs charged to ED grants must be necessary, reasonable, and allowable. All costs must also consider the amount of money being spent and the needs of the program (2 CFR 200.403(a)). This requirement comes from a set of federal regulations known as the Uniform Grant Guidance (UGG), which applies to all federal grants. All employees charged to federal grants must document the time they spend working on the grant's objective to demonstrate that the amounts charged to federal programs are true and accurate (commonly referred to as Time and Effort).

Targeted Assistance and Schoolwide Programs

Schools that are eligible and receive Title I funds must design and implement programs to support eligible Title I students either through a schoolwide or targeted assistance model.

Targeted Assistance Programs

Title I targeted assistance program funds may only be used to meet the needs of children identified as being in the greatest need of services. In a targeted assistance program, all costs must be supplemental and limited to services for eligible students. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the challenging State academic standards on the basis of multiple, educationally related, objective criteria established by the local educational agency and supplemented by the school; however, children from preschool through grade 2 shall be selected solely on the basis of criteria, including objective criteria, established by the local educational agency and supplemented by the school (ESEA Section 1115(c)). Eligible children also include special populations such as Head Start children, migrant children, neglected and delinquent children, and homeless children (ESEA Section 1115(c)(2)).

NOTE: Funds received under this part may not be used to provide services that are otherwise required by law to be made available to children described in paragraph (2) but may be used to coordinate or supplement such services (ESEA Section 1115(c)(3)).

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Schoolwide Programs

Title I schoolwide program funds are used to upgrade the entire educational program in a school and all students may benefit from the use of Title I funds. Activities must be part of the schoolwide plan and support an identified academic need through the school's comprehensive needs assessment (ESEA Section 1114). For more information, see the [federal guidance regarding use of funds in a Schoolwide Program](#).

Use of Funds

All Title I expenses must be reasonable, necessary, allowable and aligned with the program purpose. [Table 1](#) provides an overview of allowable activities and use of funds to support Title I program planning activities.

Table 1. Title I Allowable and Unallowable Expenses

Allowable Expenses May Include	Unallowable Expenses May Include
<p>Academic support for at-risk students</p> <ul style="list-style-type: none"> • Certified teachers and teaching assistants for Title I programs • Other professional staff providing supplemental services (e.g., counselors, social workers, etc.) • Proportional benefits for Title I salaries • Equitable services for private school students • Title I preschool, Title I summer school, and Title I extended day program • Transportation for Title I extended day and summer programs not otherwise available • Salary of the Homeless Education Liaison performing the duties of the homeless liaison (see the practice brief) <p>Support staff for Title I programs</p> <ul style="list-style-type: none"> • Data management staff for Title I only • Secretary/clerks for Title I only • Title I Coordinators • Stipends for principals outside contract hours • Nurses for summer and extended day Title I programs <p>Title I program supplies and materials</p> <ul style="list-style-type: none"> • Supplemental instructional materials • Computer aided instruction software for academic intervention services • Diagnostic and progress monitoring materials • Title I data management software • Nutritional snacks for Title I students during extended day and summer programs • Technology to upgrade the educational program of a schoolwide program <p>Title I parent and family engagement</p> <ul style="list-style-type: none"> • Parent Liaison or Coordinator • Consultants for parent engagement • Stipends for staff to plan for or participate in Title I activities outside contract hours • Costs for activities including materials, transportation, childcare, and light refreshments <p>Professional development aligned with Title I</p> <ul style="list-style-type: none"> • Stipends and/or substitutes for staff 	<p>Core instruction or mandated services</p> <ul style="list-style-type: none"> • Teachers providing core instruction • Base pay for principals (contract hours) • Superintendents and administrators with districtwide responsibilities • Special education services (OT, PT, speech) • Mandated school counselors, nurses, etc. • Direct reimbursements to private schools. • Costs for standardized screening to determine student eligibility for Title I services. • Costs for administering, scoring and reporting results for mandated state assessments <p>Supplies and materials</p> <ul style="list-style-type: none"> • Food and refreshments for staff activities, including working lunches • Costs for basic reading series or materials for core instruction • Promotional items (e.g., T-shirts, caps, tote bags, imprinted pens, keychains) • Door prizes, movie tickets, gift certificates, pass to amusement parks, etc. • Ceremonies, banquets, or celebrations <p>Professional development</p> <ul style="list-style-type: none"> • PD workshops that are stand-alone, one-day, or short-term

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Allowable Expenses May Include	Unallowable Expenses May Include
<ul style="list-style-type: none"> ● Educational Consultants ● Reasonable supplies and materials for PD ● PD aligned with Title I program goals ● Conference costs that meet state and federal guidelines (see the U.S. ED FAQs) <p>Transportation</p> <ul style="list-style-type: none"> ● Transportation for Title I extended day and summer programs not otherwise available ● Incremental cost of homeless transportation to and from school of origin 	<p>and are not aligned to a schoolwide plan or school improvement initiative</p> <p>Other</p> <ul style="list-style-type: none"> ● Field trips for entertainment or recreational purposes only ● Construction, remodeling, or renovation

Required Set-Asides Title I, Part A at the LEA Level

Homeless Reserve

All districts must set aside funds for services to homeless children on the Title I budget application. This means that even school districts that have not recently identified homeless students will be required to set aside funds for children and youth experiencing homelessness. Districts must establish a method for allocating Title I set-aside funds for homeless children and youth. Generally, these methods involve conducting a needs assessment for homeless students in the school district or basing the amount on a formula, such as per pupil expenditure. Determining an appropriate amount requires coordination between the Title I coordinator and the Homeless education liaison (ESEA Section 1113(c)(3)(C)). Title I funds may support the work of the homeless education liaison.

A [U.S Department of Education Letter, July 2018](#) clarifies that all local educational agencies that receive Title I Part A funds must reserve funds to support homeless children and youth. Additional guidance can be found in this [two-page summary of Title I and Homelessness](#).

The [U.S. Department of Education guidance](#) (Question M-4, pp. 40-41) provides [a list](#) of some of the specifically authorized services, and also outlines two general principles for using Title I funds:

- Services must be reasonable and necessary to enable homeless students to take advantage of educational opportunities, and
- Funds must be used as a last resort when services are not reasonably available from another public or private source.

Parent and Family Engagement Reserve (Formerly Parent Involvement)

LEAs with Title I allocations greater than \$500,000 must reserve an amount equal to 1% of the Title I, Part A allocation and allocate 90% of those funds to Title I schools for Parent and Family Engagement activities. This also applies to the private school's equitable portion. These funds must be clearly identified in the Title I budget. This is a budget and spend requirement.

Application Requirements

Districts accepting Title I funds must complete the annual application and budget through the Consolidated Application found in Consolidated Accountability and Support Application (CASA).

Section 200.415 includes language that grantees must attest to: "By signing this report, I certify to the best of my knowledge and belief that the report is true, complete and accurate, and the expenditures, disbursements, and cash receipts are for the purposes and objectives set forth in the terms and conditions of the federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812)."

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Stakeholder Engagement

Please see the following [Parent and Family Engagement Requirements for Title I](#) section.

Assurances (ESEA Section 1112. 20 U.S.C. 6312 (c))

1. The local education agency assures it will ensure that migratory children and formerly migratory children who are eligible to receive services are selected to receive such services on the same basis as other children who are selected to receive services.
2. The local education agency assures it will provide services to eligible children attending private elementary schools and secondary schools in accordance with section 1117, and timely and meaningful consultation with private school officials regarding such services.
3. The local education agency assures it will participate, if selected, in the National Assessment of Educational Progress in reading and mathematics in grades 4 and 8 carried out under section 303(b)(3) of the National Assessment of Educational Progress Authorization Act.
4. The local education agency assures it will coordinate and integrate services provided under this part with other educational services at the local educational agency or individual school level, such as services for English learners, children with disabilities, migratory children, American Indian, Alaska Native, and Native Hawaiian children, and homeless children and youths, in order to increase program effectiveness, eliminate duplication, and reduce fragmentation of the instructional program.
5. The local education agency assures it will collaborate with the State or local child welfare agency to:
 - a. Designate a point of contact if the corresponding child welfare agency notifies the local educational agency, in writing, that the agency has designated an employee to serve as a point of contact for the local educational agency; and
 - b. By not later than 1 year after the date of enactment of the Every Student Succeeds Act, develop and implement clear written procedures governing how transportation to maintain children in foster care in their school of origin when in their best interest will be provided, arranged, and funded for the duration of the time in foster care, which procedures shall:
 - i. Ensure that children in foster care needing transportation to the school of origin will promptly receive transportation in a cost-effective manner and in accordance with section 475(4)(A) of the Social Security Act; and
 - ii. Ensure that, if there are additional costs incurred in providing transportation to maintain children in foster care in their schools of origin, the local educational agency will provide transportation to the school of origin if:
 1. The local child welfare agency agrees to reimburse the local educational agency for the cost of such transportation;
 2. The local educational agency agrees to pay for the cost of such transportation; or
 3. The local educational agency and the local child welfare agency agree to share the cost of such transportation.
6. The local education agency assures it will ensure that all teachers and paraprofessionals working in a program supported with funds under this part meet applicable State certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification.
7. The local education agency assures it will, in the case of a local educational agency that chooses to use funds to provide early childhood education services to low-income children below the age of compulsory school attendance, ensure that such services comply with the performance standards established under section 641A(a) of the Head Start Act.

Additional Guidance Quick References for Title I, Part A Programs

Selection of Schools Information (Rank and Serve)

- Only qualifying schools are eligible to use Title I funds and operate Title I programs
 - All Title I buildings must be served in rank order of poverty – serving the highest poverty buildings first, either by grade-span groupings or by rank order

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- Schools with poverty rates at or above 75% must be served
- Schools at or above 35% poverty may be served
- Schools at or above the district-wide poverty percentage, if less than 35% poverty
- If a district has only one building in a grade span, the building may be served regardless of the district-wide poverty percentage
- Special exception for 1 year – Grandfather year
- Rank and serve does not apply to districts with enrollment less than 1,000 (ESEA Section 1113(a)(6))
- [Public Law 114-95](#)

Parent and Family Engagement Requirements for Title I (ESEA Section 1116)

- Involve parents in the planning, review, and improvement of the parent and family engagement programs and policy
- Convene an annual meeting at a convenient time to explain the requirements of Title I program
- Develop and distribute a school-parent compact
- Districts that receive \$500,000 or less need not set aside a particular amount, but they still must fulfill all of the law's requirements. Districts that receive more than \$500,000 should:
 - Determine their reservation (at least 1%);
 - Allocate at least 90% of the remaining funds to Title I schools; and
 - Use any remaining district-level set-aside funds for district-level parental involvement
- Districts must have a parental involvement policy developed with input from parents
- Title I schools must have a parental involvement policy and school-parent compact, hold an annual Title I meeting and other flexibly scheduled meetings, provide Title I program information to parents, build parent capacity, and involve parents in developing policies and determining how the set-aside is spent
- The State must review districts' parental involvement policies and practices to determine if those meet the law's requirements. Parental involvement expenses are monitored like other Title I expenditures

Homeless Education and Title I Set Aside

- All districts receiving Title I funds must set aside Title I funds to provide comparable services. These funds may be used to serve any homeless student in the district (PK-12) regardless of attendance at a Title I or non-Title I school. Homeless students are categorically eligible to receive Title I services regardless of academic eligibility
- [Serving Homeless Students under Title I, Part A](#)
- [Letter regarding Title I, Part A reservation to serve homeless students](#) (July 30, 2018)
- [Homeless Student Guidance](#) (Updated March 2017)

Equitable Title I Services for Eligible Private School Students

- A public district's Title I allocation is based on census counts of all school-age children from low-income families who live in a district – not just those who attend public schools. Districts must identify and annually offer equitable services to Title I-eligible students within participating attendance zones who attend private schools
- Expenditures for equitable services for eligible private school children, teachers, other educational staff, and families must be equal to the proportion of funds allocated to the public school attendance areas based on the number of children from low-income families living in those public school attendance areas who attend private schools. A district must determine the proportionate share based on its total amount of Title I funds before any allowable expenditures or transfer of funds
- Public school districts should establish good communication and program coordination with the private schools within their district boundaries
- Private schools are not obligated to participate in consultation meetings or agree to receive Title I-funded services
- After consultation with private school officials, the public district must design a Title I program that meets the needs of private school participants. The district is responsible for planning, designing, implementing and evaluating the Title I program, and it may not delegate that responsibility to the private schools or their officials
- Private school officials may not order or purchase materials and supplies needed for the Title I program

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- Students that generate Title I funds for private school services and students who are eligible to receive Title I services may not always be the same students
 - Private school students that generate Title I funds include low-income students residing in a served Title I school attendance center
 - Private school students eligible to receive Title I services include students that are at-risk of not meeting academic standards
- Title I services for private school students may not be schoolwide programs
- The Title I program may serve students in different grades than those receiving Title I services in public schools, so long as they are in the same grade spans (elementary, middle, or high school)
- [ESSA Non-Regulatory Guidance Fiscal and Equitable Service 11-21-2016](#)

Title I Budget Hints

- LEAs with an allocation of \$50,000 or more may carryover up to 15% of the general allocation (ESEA Section 1127)
- LEAs may apply for an excess carryover waiver once every three years (ESEA Section 1127)
- [Office of Management and Budget Uniform Grants Guidance](#)
- Remember the required set asides – Equitable services for eligible private school students, Services for Homeless Children, Parent and Family Engagement

How to Move from a Targeted Assistance Program to a Schoolwide Program

- Title I school must reach the 40% poverty threshold to consider moving to a schoolwide service delivery method (a waiver option is available for buildings under 40% poverty threshold)
- To become a schoolwide program, the Title I school must spend up to a school year of planning
- During the planning year, form a schoolwide planning team that involves parents, community members, those who will carry out the plan including teachers, principals, school leaders, etc.
- The plan must contain elements described in [Public Law 114-95](#) (ESEA Section 1114)

Title I Preschools

- Title I Preschools must follow the Head Start Standards
- A school that operates a schoolwide program under this section may use funds available under this part to establish or enhance preschool programs for children who are under 6 years of age (ESEA Section 1114(c))
- Schoolwide plans must include strategies for assisting preschool children in the transition from early childhood education programs to local elementary school programs (ESEA Section 1114(7)(A)(iii)(V))
- Targeted assistance programs may serve preschool students. ESEA Section 1115(c)(2)(B) defines Head Start and preschool children as children who, at any time in the 2 years preceding the year for which the determination is made, participated in a Head Start program, the literacy program under subpart 2 of part B of title II, or in preschool services under this title, are eligible for services under this part

Next Steps

The Department will hold webinars and on-site workshops to assist districts in completing their ESSA applications. For more information on Iowa's ESSA implementation and training schedule, including archived and upcoming webinars, see the [ESSA School Improvement Timeline](#).

Additional Guidance

For additional Title I guidance, see the Department's [Every Student Succeeds Act](#) webpage or contact Geri McMahon, Title I Administrative Consultant, at Geri.McMahon@iowa.gov.