

# Title I Fiscal Updates

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# Overview

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- Allocations
  - To Divisions
  - To Eligible Schools
- Carryover Provisions
- Community Eligibility Program
- Title I Funds for Homeless Children and Youth
- Title I Funds to Support English Language Learners
- Omni Circular Updates



# Allocations



# Title I Funding for 2014-2015 – Preliminary Allocations

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- Total Federal Funding Year (FFY) 2014 allocation is **\$14.4 billion**
  - Made available by Congress under Public Law 113-76, the Consolidated Appropriations Act, 2014.
- U. S. Department of Education (USED) preliminary allocation to Virginia is **\$234,075,588**
  - 6.24 percent increase compared to FFY 2013 (\$220,317,487)
  - 2012 U.S. census estimates
  - State per-pupil expenditure data from SY 2011-2012



# Preliminary Allocations

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- NOTE: While the state's overall Title I allocation has been increased 6.24 percent, this does not mean that each school division will receive an increase in Title I funds
- Preliminary Title I, Part A, allocations from USED do not reflect the state set-asides, changes in final census data, and other adjustments required by law
- The final allocation for each school division is likely to differ from the preliminary allocation



# Determining State Allocations

<b>Basic Allocation</b>	<b>Concentrated Allocation</b>	<b>Targeted Allocation</b>	<b>EFIG Allocation</b>
<b>Title I, Part A, Allocations</b>			



# Basic Allocation

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- The U. S. Department of Education (USED) allocates FY 2014 Basic Grant funds to divisions through a statutory formula based primarily on 2012 estimates of the number of children, ages 5 through 17, from low-income families, which the Census Bureau updates annually, and on the school year 2011-2012 per-pupil expenditure data.
- In order to receive a basic grant, a school division must have at least ten formula children and the number of those children must ***exceed two percent*** of the school division's total population of children ages 5 through 17.



# Concentrated Allocation

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USED allocates concentration grant funds to school divisions in which the number of children counted for basic grant formula purposes exceeds 6,500 or **15 percent** of the total population of children ages 5 through 17.



# Targeted Allocation

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- The targeted grants formula uses the same data elements as basic and concentration grants.
- USED then adjusts the number of formula children to give greater weight to those school divisions with higher numbers or percentages of formula children.
- In order to receive a targeted grant, the number of formula children in a school division counted for basic grant allocation purposes must be at least ten and equal or **exceed five percent** of the school division's total population of children ages 5 through 17.



# EFIG Allocation

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- The Education Finance Incentive Grants (EFIG) formula, in addition to using the number of Title I, Part A, formula children and each state's per-pupil expenditures, distributes funds to states based on:
  - **an effort factor** that measures a state's effort to provide financial support for education compared to its relative wealth as measured by its per capita income; and
  - **an equity factor** that measures the degree to which education expenditures vary among school divisions within a state.



# State Set-Asides: School Improvement

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- Section 1003(a) of ESEA – States are required to reserve four percent of the amount it receives under Title I, Part A, for school improvement activities authorized in Sections 1116 and 1117.
- When reserving funds for school improvement activities, the state education agency must ensure no school division receives less in total under Title I, Part A, than it received in the prior year because of the four percent reservation.



# State Set-Asides: Administration

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## Administration

- Section 1004(a) of the ESEA allows a state to reserve not more than one percent for administrative purposes.

## Equitable Services Bypass

- Reservation for equitable services
- 14 school divisions participate



# Determining School Eligibility

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1. Rank order all schools in the division by poverty
2. Serve, in rank order of poverty, schools above 75% poverty, including middle and high schools
3. AFTER all schools above 75% poverty have been served, the division may:
  - a) Continue with division-wide ranking; or
  - b) Rank remaining schools by grade span

*NON-REGULATORY GUIDANCE: LOCAL EDUCATIONAL AGENCY IDENTIFICATION AND SELECTION OF SCHOOL ATTENDANCE AREAS AND SCHOOLS AND ALLOCATION OF TITLE I FUNDS TO THOSE AREAS AND SCHOOLS*



# Ranking Schools by Grade Span

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Division will use either the divisionwide poverty average or grade-span average for selected grade span(s):

- In rank order of poverty, schools are eligible if they are above the divisionwide poverty average or the grade-span average until all schools at or above the selected poverty average are served or no funds remain
- If remaining funds are not sufficient to fully fund the next ranked eligible school, the division may serve the school if it determines the funds are sufficient to enable children to make adequate progress toward meeting state standards



# Ranking Schools by Grade Span

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- Divisions with enrollment of less than 1,000 students or with only one school per grade span do not have to rank school attendance areas
- Divisions define grade span grouping and determine appropriate grade span for schools that overlap grade spans
- Division discretion to select schools based on:
  - 35% Rule
  - Grandfather Provision
  - Skipped School Provision



# Division Set-asides

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Before allocating funds, the division may reserve funds “off the top” for:

- Parental Involvement
- School Improvement
- Division Level Program Administration
- Teacher Quality
- Title I Preschool
- Private School Services (administrative and special capital expenses)
- Homeless
- Neglected/Delinquent



# School Allocations

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- Funds must be allocated to participating schools in rank order based on poverty
- Division does not have to allocate the same PPE to each school, but must allocate in rank order
- Per Pupil Expenditure (PPE) amounts may vary for different grade spans



# School Allocations

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- If a division serves one or more schools below 35% poverty, allocations for all schools will be based on a PPE of at least 125% of the division's allocation per low-income child

Step 1: Determine PPE

Division Total  $\div$  Low Income Students in Division = PPE

Step 2: Determine Adjusted PPE

PPE  $\times$  125% = Adjusted PPE



# Below 35% Low Income

A.

Division's Title I Allocation : 205,371.43

Minus Set-Asides (if applicable): 113.76

Amount for Distribution to Schools: 205,257.67  
( Feeds Box 12)

Divisionwide Average From Low-Income Families 22.8%



# Below 35% Low Income

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## \*PER PUPIL EXPENDITURE CALCULATION

Step 1:

<u>205,371.43</u>	<u>661.0</u>	=	<u>310.70</u>
Division Total Allocation	Number of Low-Income Pupils in Entire School Division		Per Pupil Expenditure (PPE)

Step 2:

<u>310.70</u>	<u>125.0</u>	=	<u>388.37</u>
PPE	At least 125 percent (enter whole number)		Adjusted PPE



# School Allocations

Example: Division with **\$10,000 allocation** and **100 low income students in division**

- Step 1: Determine PPE

$$\$10,000 \div 100 \text{ students} = \$100 \text{ per student}$$

- Step 2: Determine Adjusted PPE

$$\$100 \times 1.25 = \text{Adjusted PPE} = \$125 \text{ per student}$$

School	Number of Low-Income Students	Adjusted PPE	Minimum Allocation
School A	20	\$125	\$2,500
School B	30	\$125	\$3,750



# Carryover Provisions



# Carryover Provisions

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- Total period of grant award is 27 months
- 85% of funds must be obligated within 15 months
- Up to 15% can be carried over for the remaining grant award period



# Carryover Timeline

Year of Grant Award	Total Grant Award Period	Deadline to Obligate 85% of Award*	Deadline to Obligate 100% of Award	Deadline to Request Reimbursement for ALL funds
FFY 2014 (2014-2015)	July 1, 2014 – Sept. 30, 2016	Sept. 30, 2015	Sept. 30, 2016	Nov. 15, 2016
FFY 2013 (2013-2014)	July 1, 2013 – Sept. 30, 2015	<b>Sept. 30, 2014</b>	Sept. 30, 2015	Nov. 15, 2015
FFY 2012 (2012-2013)	July 1, 2012 – Sept. 30, 2014	Sept. 30, 2013	<b>Sept. 30, 2014</b>	<b>Nov. 15, 2014</b>

\*Some divisions may receive a waiver to carry over more than 15% of award



# Definition of Obligation

<b>IF AN OBLIGATION IS FOR --</b>	<b>THE OBLIGATION IS MADE --</b>
(a) Acquisition of real or personal property.	On the date on which the state or subgrantee makes a binding written commitment to acquire the property.
(b) Personal services by an employee of the State or subgrantee.	When the services are performed.
(c) Personal services by a contractor who is not an employee of the State or subgrantee.	On the date on which the state or subgrantee makes a binding written commitment to obtain the services.
(d) Performance of work other than personal services.	On the date on which the state or subgrantee makes a binding written commitment to obtain the work.



# Definition of Obligation

<b>IF AN OBLIGATION IS FOR --</b>	<b>THE OBLIGATION IS MADE --</b>
(e) Public utility services.	When the state or subgrantee receives the services.
(f) Travel.	When the travel is taken.
(g) Rental of real or personal property.	When the state or subgrantee uses the property.
(h) A pre-agreement cost that was properly approved by the State under the applicable cost principles.	On the first day of the subgrant period.



# Carryover Waiver Guidelines

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- School divisions may apply for a waiver to exceed the 15% carryover limitation once every three years if:
  1. The state agency determines that the request is reasonable and necessary; or
  2. Supplemental appropriations become available
- School divisions that receive less than \$50,000 are excluded from the carryover limitation

[Superintendent's Memo #100-14 – Title I, Part A Carryover Provisions and Reallocation Procedures Under the \*Elementary and Secondary Act of 1965\* \(ESEA\)](#)



# Eligibility to Request Waiver

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Waiver Request from LEA	Eligible to Request Waiver in Future
FY 2013	FY 2016
FY 2012	FY 2015
FY 2011	FY 2014
FY 2010	FY 2013



# The Community Eligibility Program



# What is the Community Eligibility Program (CEP)?

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- Universal meal program designed by the National School Lunch Program
- Response to the Healthy, Hunger-Free Kids Act of 2010
- Goal of providing more free meals to low-income students
- In each participating school, **all** students are provided **free breakfast** and **free lunch**



# The Community Eligibility Program

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- Implementation began in 2011-2012
- Currently LEAs in 10 states and the District of Columbia are implementing
- Will be available in all states in the 2014-2015 school year
- Eligibility based solely on “direct certification” data—no household applications



# The Community Eligibility Program

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- To be eligible, a school, group of schools, or LEA must have at least 40 percent of its students “directly certified”
- Direct certification data come from programs such as the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF)
- Direct certification data do not have to be updated for CEP purposes during the 4 year CEP cycle



# How does CEP impact Title I school ranking?

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- 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)



# CEP and Ranking Schools

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- LEAs with some CEP and some non-CEP schools may apply the “multiplier” to the CEP direct certification data to make it comparable to low-income data from non-CEP schools
- LEAs with all CEP schools do not need to use the multiplier to rank schools
- All schools may also be ranked using only direct certification data
- Each school’s data must be reported separately (not in a group or by division average, even if schools were grouped for CEP eligibility)
- The LEA or school **must** use updated direct certification data on an annual basis for Title I purposes, even if these data are not used for CEP purposes



## How does CEP impact accountability?

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- Direct Certification Data 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).



# Information on CEP

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- [U. S. Department of Education Guidance - The Community Eligibility Provision and Selected Requirements under Title I, Part A of the \*Elementary and Secondary Education Act of 1965\*, as amended.](#)
- [Superintendent's Memo #066-14: Community Eligibility Provision \(CEP\): Guidance and Procedures for School Year 2014-2015](#)
- [Superintendent's Memo #104-14: Identification of the Economically Disadvantaged Subgroup for Title I Accountability Under the Community Eligibility Provision](#)
- [Community Eligibility Provision \(CEP\): Application Process for School Year 2014-2015](#)



# Title I Funds for Homeless Children and Youth



# Title I, Part A, Program Requirements

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- Homeless children and youth are eligible to receive Title I, Part A services
- Applies to Title I schoolwide program schools, Title I targeted assistance schools, and non-Title I schools
- Divisions must reserve a portion of Title I, Part A funds to provide instructional and support services for students enrolled in non-Title I schools
- Services should be comparable to those typically provided with Title I funds
- Division determines funding amount necessary to provide services to homeless children and youth enrolled in non-Title I schools



# New Flexibility for Title I Funds

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- USED letter to states clarifies the expanded use of Title I funds under the Consolidated Appropriations Act of 2014
- Flexibility applies to FY 2014 Title I funds and also to FY 2012 and FY 2013 carryover funds
- Unknown whether flexibility will apply in future years



# New Flexibility for Title I Funds

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- Funds may be used to support a local homeless liaison
- Divisions that currently use state or local funds to support a homeless liaison may choose to use FY 2014 Title I funds for this purpose
- Authority provided in the Consolidated Appropriations Act supersedes the presumption of supplanting
- Title I allowable cost principles of *reasonable* and *necessary* still apply



# New Flexibility for Title I Funds

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- Funds may be used to provide transportation to the school of origin **above what the LEA would otherwise provide to transport the student to his or her** assigned school
- Funds used to support homeless liaison and/or provide transportation must be over and above the funds reserved for the required services
- Using Title I funds under the new flexibility **does not meet** the requirement to reserve funds to provide instructional and related services to homeless children and youth who attend non-Title I schools



# Designating Homeless Set-aside in the Title I Application

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- Divisions will indicate the amount used for the optional transportation and/or homeless liaison costs on the homeless set-aside line of the Title I application
- Required reservation to provide instructional and related services to homeless children and youth will also be included on this line
- Expenditures must be described separately in the detailed budget breakdown to allow specialists to efficiently complete the application review and approval process



# Information on Serving Homeless Children and Youth

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- [USED Letter to States Providing Information About the New Authority in the Consolidated Appropriations Act, 2014 Regarding the Use of Fiscal Year \(FY\) 2014 Title I Funds](#)
- [VDOE Title X, Part C Web site](#)
- [Program Coordination for Children Receiving Services from Title I, Part A, and/or Services from Title X, Part C](#)
- [Project HOPE Web site](#)



# Title I Funds to Support English Language Learners (ELLs)



# Using Title I Funds to Support ELLs

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- Title I funds can be used to support ELLs
- Guidelines for determining allowability:
  - Funds are supplemental—
    - Not used to support the core instruction program
    - Not used for programs/services required by state and local laws
    - Not used to pay for something that was paid for in previous years with other federal, state, or local funds
  - Funds are used in Title I schools



# Examples of Appropriate Uses of Title I Funds

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- Research-based programs to increase English proficiency levels of ELLs
- Providing high-quality professional development to classroom teachers
- Upgrading programs objectives and effective instructional strategies
- Providing supplemental instructional materials, including educational technology



# Examples of Appropriate Uses of Title I Funds

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- Providing tutoring, academic or vocational education, intensified instruction
- Providing community participation programs, family literacy services, parent outreach and training activities to ELLs and their families
- Staff performing services that are supplemental to the core ELL program
  - Cannot provide core services
  - Job description must be different than the job description of other staff serving ELLs—cannot use Title I funds to hire ELL staff that are the equivalent of class size reduction



# Omni Circular Updates



# Background on the Omni Circular

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- Guidance document developed by the Office of Management and Budget (OMB)
- Provides guidelines and guidance on administrative requirements, cost principles, and audit requirements for federal awards
- Will replace current OMB Circulars— “A 87”
- Will be accompanied by changes to EDGAR (Education Department General Administrative Regulations)
- Effective December 26, 2014 for new awards or additional funding allocated to existing awards



# Omni Circular Guidance

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- Monitoring will focus on compliance with applicable Federal requirements *and* achieving performance goals (78636)
- Risk-based approach to determining appropriate monitoring (78636)
- Computing devices under \$5,000 classified as supplies, not equipment (78617)
- Cost of entertainment unallowable (78653)

*Uniform Administrative Requirements, Cost Principles,  
and Audit Requirements for Federal Awards*



# VDOE Contact Information: Title I Specialists

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# VDOE Contact Information: Title I Coordinator

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VDOE Title I staff contact information, including specialists' assigned divisions, is posted on our web site:  
[http://www.doe.virginia.gov/federal\\_programs/esea/title1/part\\_a/index.shtml](http://www.doe.virginia.gov/federal_programs/esea/title1/part_a/index.shtml)



# Questions?

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