

Title Talk Tuesday - 2018-19 Consolidated Application for ESSA Funded Programs

Questions and Answers

July 24, 2018

Child Counts

Q1. What is the best way to collect the low-income information for every school in the district? Many of our schools are not reporting poverty in their school management systems.

A1. To allocate Title I funds to school attendance areas and schools, ESSA requires an LEA to select a poverty measure from the following options:

- Children ages 5-17 in poverty as counted in the most recent Census data approved by the Secretary.
- Children eligible for free and reduced-price lunches under the Richard B. Russell National School Lunch Act.
- Children in families receiving assistance under the State program funded under Title IV Part A of the Social Security Act (TANF).
- Children eligible to receive medical assistance under the Medicaid program.
- A composite of any of the above measures.

Identified students under a Community Eligibility Provision (CEP) are eligible under the Richard B. Russell National School Lunch Act. If an LEA selects National School Lunch Program (NSLP) data as its poverty measure (or uses the data in a composite) and has a CEP school, the CEP data will be part of the NSLP data that the LEA uses for within district allocations.

For additional information about how the allocation of Title I funds interact with the Community Eligibility Provision, see [*The Community Eligibility Provision and Selected Requirements Under Title I, Part A, of the Elementary and Secondary Education Act of 1965, as Amended, U.S. Department of Education, revised March 2015.*](#)

Q2. We moved to Community Eligibility Provision (CEP) school lunch program- all kids get free lunch. This has now decreased our number of families applying for free lunch. Our number of kids in poverty dropped by 50 and our Title I grant dropped by \$50,000. How do we contest this?

A2. Deployment of a Community Eligibility Program does not impact the amount of Title I funds an LEA generates in any given year. Instead, the Title I allocation process used by the U.S. Department of Education to apportion Title I monies between states, then amongst local educational agencies is based on child count information collected via a combination of sources. Specifically, the child count dataset used for the 2018-2019 Title I allocations is composed of the number of children:

- Ages 5-17 in poverty (data from U.S. Census, updated annually);
- Residing in institutions for the neglected (data from State Education Department survey);
- In foster care (data from NYS Office of Temporary and Disability Assistance); and

Title Talk Tuesday - 2018-19 Consolidated Application for ESSA Funded Programs

Questions and Answers

July 24, 2018

- Receiving Temporary Assistance for Needy Families (data from NYS Office of Temporary and Disability Assistance).

The sum of the four determines the proportion of State Title I monies an individual LEA is allocated.

Q3. If the Feds are determining the number of kids living in poverty in each district, (driving Title I allocations) why are the districts then expected to report the percentage of kids living in poverty for each school? Why doesn't NYSED dictate what these numbers are based on USED information?

A3. When allocating Title I Part A funds to schools, an LEA must rank all of its school attendance areas (the geographic area from which a public school draws its children) according to their percent of poverty. Within this process, there are numerous opportunities for flexibility such as which poverty criteria are used, how schools are grouped for ranking, and differentiating of per pupil rates. NYSED does not dictate the poverty figures in order to preserve each LEA's flexibility in determining how Title I, Part A funds are distributed.

Q4. Our poverty counts are severely reduced this year. Our numbers don't seem correct. How can we fix this?

A4. It is important to note that the poverty counts listed on the annual Title I Allocation webpage are not based on the percentage of students that qualify for free/reduced price lunch. Instead, the poverty criteria used by USDE is a more aggressive threshold for determining poverty rate. As a result, the listed percentages for many LEAs may be much lower than free/reduced price lunch rates typically used by most districts.

Budget: FS-10

Q5. This is our first year as a Title 1 district-wide school. Do we do the FS-10 process separately for each respective Title program or do 1 with all of the money in one pot?

A5. An LEA must submit a unique FS-10 budget form and budget narrative for each program area under which the district has received an allocation. Specifically, an LEA may submit separate budgets for each of the following programs.

- Title I, Part A
- Title I, Part D
- Title II, Part A
- Title III, Part A ELL
- Title III, Part A Immigrant
- Title IV, Part A
- Title V, Part B

Title Talk Tuesday - 2018-19 Consolidated Application for ESSA Funded Programs

Questions and Answers

July 24, 2018

Equitable Participation

Q6. Does an LEA have to allocate Title IIA and Title IVA funds for private schools if the allocation is below a certain amount?

A6. Yes, an LEA is obligated to equitably share Title IIA and Title IV funds with private schools that operate within the district's geographic catchment area.

Q7. Is the district obligated to send a private school that is not in the district or participating in the Title I, Part A program (because of lack of eligible students or any district students at all) a copy of the Consolidated Application?

A7. The LEA should provide, in a timely manner, a copy of the Consolidated Application to private school officials upon request. Such applications are a matter of public record and, therefore, generally are accessible for public review. An application can provide private school representatives with information that enhances consultation and helps them understand the scope of program activities within the LEA and the equitable participation of private school students in programs authorized under ESSA.

Q8. Can non-publics decline to use the 1% Parent and Family Engagement set-aside, if minimal amounts (i.e., \$10), and roll it into their Title I pot?

A8. Yes. LEA's receiving more than \$500,000 in Title I monies has an obligation to provide parent and family engagement activities for the families and parents of eligible private school students. The district, in consultation with private school officials, can decide to use those funds for other allowable Title I, Part A purposes. They should indicate in writing in the affirmation form that they will be using the 1% set-aside for other Title I, Part A allowable purposes.

Transferability

Q9. If a district already uses Title IIA funds to fund an AIS teacher under transferability, can Title IV funds be transferred to Title IIA to increase that AIS teacher's salary? (in essence, a double transfer).

A9. An AIS teacher salary would not be an allowable expense under Title IIA. However, the Title IV funds could be transferred to Title I to fund supplemental services that meet the intent and purpose of the Title I program, as demonstrated through the needs assessment.

Title Talk Tuesday - 2018-19 Consolidated Application for ESSA Funded Programs

Questions and Answers

July 24, 2018

Q10. So, to clarify, if I need more money in Title 1, I simply write it into Title IV? Or, do I have to say yes to transferability of Title IV to Title I?

A10. If the LEA intends to exercise the transferability, the LEA should indicate "Yes the LEA intends to use transferability in 2018-19" and complete the Transferability Detail page within the Consolidated Application. On the Title IV FS-10 budget form and budget narrative, the LEA should clearly indicate which budget items are subject to transferability.

Title IV Student Support and Academic Enrichment Grant

Q11. Is Title IV a new Title program and will there be guidance for it?

A11. Title IV, Part A of the ESEA, the Student Support and Academic Enrichment (SSAE) program is newly authorized under ESSA and is intended to help meet the goal of providing all students with a high-quality education by increasing the capacity of local educational agencies (LEAs), schools, and local communities to: 1) provide all students with access to a well-rounded education; 2) improve school conditions for student learning; and 3) improve the use of technology in order to improve the academic achievement and digital literacy of all students. Specific guidance related to Title IV will be forthcoming.

Q12. Is there going to be a Title IV allowable expenses document like the others?

A12. Yes, a Title IV allowable expense document has been posted online at <http://www.nysed.gov/essa/schools/consolidated-application> under the "Fiscal Information" banner.

Q13. If a district receives a Title IV allocation less than \$30,000 but uses transferability from Title IIA to Title IV which pushes their Title IV allocation above the \$30,000 threshold, will they be required to meet the 20% distribution requirements to well-rounded education and safe and healthy students and perform a needs assessment?

A13. An LEA that receives an allocation of less than \$30,000 of SSAE program funds is not required to use 20% of their allocation for well-rounded education or 20% of the allocation for safe and healthy students. However, if a district exercises the transferability option and transfers Title IIA funds into Title IV, the transferred funds now act like title IV funds. If this transfer causes the allocation to be greater than \$30,000 then the district is subject to the comprehensive needs assessment and 20% minimum distribution requirements as well as spending a portion of funds for the effective use of technology.

NYSED requires all LEAs, regardless of the amount of Title IV funds allocated, to describe the Title IV, Part A program in terms of specific student needs and/or obstacles confronting the LEA that impact student achievement. In addition, LEAs must describe the recent comprehensive needs assessment

Title Talk Tuesday - 2018-19 Consolidated Application for ESSA Funded Programs

Questions and Answers

July 24, 2018

used by the district to determine these challenges as they relate specifically to each of the Title IV, Part A content areas for which the LEA intends to allocate funds - Well-Rounded Educational Opportunities, Safe and Healthy Students, and/or Effective Use of Technology.

Q14. Does the district's needs assessment drive what the nonpublic can use for their share of Title IV funds? Or is it based on the needs of students in the nonpublic school?

A14. No, the nonpublic use of funds should be determined through a timely and meaningful consultation process and should meet the needs of the students at the nonpublic school.

Accountability

Q15. What are the specific requirements for Focus Districts for 2018-2019?

A15. For 2018-19, Focus Districts are required to complete and implement a District Comprehensive Improvement Plan. Similarly, schools identified as either Priority or Focus in 2017-2018 must develop and implement School Comprehensive Education Plans for 2018-2019.

Q16. Will new designations be released?

A16. It is anticipated that new designations will be released in Fall 2018.

Evidence-Based Practices

Q 17. New this year is the evidence portion of each Title. Are you looking for actual measurable goals for each item on your FS-10 or more general goals. For example, increase graduation rate by 3%.

A 17. Goals developed for each program for which an LEA is applying for funds should be measurable and directly aligned with the identified needs and the planned uses of funds within each program. Identified goals should be described in the Consolidated Application. Progress toward the goals set by the LEA should be monitored throughout the school year and should be used to form the basis of identified needs and use of funds in the following year.

Needs Assessment

Q18. Could you possibly post an exemplar of a needs assessment?

A18. The US Department of Education has released a [Needs Assessment Guidebook](#) to help support the development of district and school needs assessments.

Title Talk Tuesday - 2018-19 Consolidated Application for ESSA Funded Programs

Questions and Answers

July 24, 2018

General Guidance

Q 19. Is there a Webinar or a pamphlet that could give me a step by step understanding of everything involved in all the title funds including how to use the website, where to get forms, what funds are available and the like?

A 19. We have several webinars and micro guidance documents that can provide an increased understanding of the ESSA federal programs posted at:

<http://www.nysed.gov/essa/schools/consolidated-application>.