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Introduction to Title I, Part A

Title I, Part A is the U.S. Department of Education's (US ED) largest K-12 grant program. Title I provides supplemental resources to help low-income schools expand opportunities for educationally disadvantaged students.

For information about Title I's allocation rules, including how LEAs must allocate Title I funds to schools—sometimes known as “ranking and serving”—please see Delaware Department of Education's (DDOE's) *Title I, Part A LEA-to-School Allocation Guidance*.

Local education agencies (LEAs) are welcome to contact DDOE for more information about this guidance, Title I in general, or to request individualized technical assistance. Please send an e-mail to:

TitlePrograms.Q&A@doe.k12.de.us.

LEA-Level Initiatives to Support Title I Schools

LEAs that receive Title I funds must carry out certain LEA-level activities such as parental involvement, services for homeless students, and equitable services for private school students. More information about these activities is available in DDOE's *Title I, Part A LEA-to-School Allocation Guidance*.

In addition, LEAs have the option to reserve Title I funds to implement LEA-managed Title I initiatives,¹ which are initiatives aimed at improving the achievement of students who attend Title I schools but are operated at the LEA level. An LEA-managed Title I initiative can benefit all or a subset of an LEA's Title I schools.²

LEA-managed initiatives that can be supported with Title I funds include:

- Preschool programs;
- Summer school programs or other extended-day or week programs;
- Additional professional development relevant to improving the academic achievement of struggling students, such as how to use data effectively in the classroom, how to support struggling readers, effective classroom management strategies, etc.;
- School improvement activities for a cluster of struggling schools, such as instructional coaches for a group of Title I schools with similar challenges, a Principal Academy to support leaders of Title I schools, etc.; and
- Other permissible Title I activities.

¹ 34 CFR Part 200

² U.S. Department of Education guidance, *Using Title I, Part A ARRA Funds for Grants to Local Educational Agencies to Strengthen Education, Drive Reform, and Improve Results for Students*, Q&A B-8 (September 2009), available at: <https://www2.ed.gov/policy/gen/leg/recovery/guidance/titlei-reform.doc>

These examples above are intended to illustrate *possible* uses of Title I funds for an LEA-managed Title I activity and are not meant to limit the use of funds. Other uses of funds that are consistent with Title I rules are also permissible.

LEA-managed initiatives are sometimes called “LEA-wide” initiatives, because they benefit all or a group of Title I schools. But, these initiatives are not truly LEA-wide in an LEA with both Title I and non-Title I schools, because an LEA cannot use Title I funds to benefit students in a non-Title I school.

Spending in a Schoolwide Program School

In Delaware, all Title I schools currently operate **schoolwide programs**. Any Title I school with at least 40% poverty can operate a schoolwide program.³ Schools with less than 40% poverty can apply to DDOE for a waiver to operate a schoolwide program if it will best serve student needs in improving academic achievement and other factors.⁴

Congress designed the schoolwide program model recognizing that high-poverty schools face a variety of challenges, and they need the ability to use Title I funds to implement comprehensive improvements and initiatives to assist struggling students by improving the school as a whole.

A school operating a schoolwide program may use Title I funds to upgrade its entire educational program.⁵ All students may participate in Title I-funded activities. This flexibility is designed to encourage schoolwide schools to implement comprehensive programs that are based on their needs.

Among other requirements, the Title I law requires schoolwide schools to:

1. Perform a comprehensive needs assessment of the entire school that takes into account information on the academic achievement of children in relationship to the challenging state academic standards, particularly the needs of those children who are failing, or are at-risk of failing, to meet state standards and any other factors as determined by the LEA;
2. Develop a schoolwide plan⁶ that describes the strategies the school will implement to address its needs, including a description of how the strategies will:
 - Provide opportunities for all children, including each subgroup of students, to meet state standards;
 - Use methods and instructional strategies that strengthen the academic program in the school, increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum, which may include programs, activities, and courses necessary to provide a well-rounded education, and

³ Section 1114(a)(1)(A).

⁴ Section 1114(a)(1)(B).

⁵ Section 1114(a)(1)(A). Schoolwide program schools have the option to “consolidate” their Title I funds with other federal, state, and local funds in order to implement a schoolwide program. Consolidation permits schools to spend *non-Title I funds* flexibly, but does not affect how a school may use its Title I funds. **Title I funds may be spent flexibly in a schoolwide program regardless of whether the school consolidates funds or not.**

⁶ The schoolwide plan must be developed (1) during a 1-year period (for schools not already operating schoolwide programs), unless the LEA determines, in consultation with the school, that less time is needed to develop and implement the schoolwide program, (2) with the involvement of key stakeholders, and (3) in coordination and integration with other federal, state, and local services, resources, and programs, if appropriate, such as programs supported under ESSA, violence prevention programs, nutrition programs, housing programs, Head Start programs, adult education programs, career and technical education programs, and schools implementing comprehensive support and improvement activities or targeted support and improvement activities under Section 1111(d). Schoolwide plans remain in effect for the duration of the school’s participation in Title I, except that schools must regularly monitor and revise their plan and implementation as necessary based on student needs to ensure that all students are provided opportunities to meet state standards. Schools must also make their schoolwide plans available to the LEA, parents, and the public, and the information contained in the plan should be understandable to the extent practical.

- Address the needs of all children in the school, but particularly the needs of those at risk of not meeting state standards, through activities which may include:
 - Counseling, school-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students' skills outside the academic subject areas;
 - Preparation for and awareness of opportunities for postsecondary education and the workforce, which may include career and technical education (CTE) programs and broadening secondary school students' access to coursework to earn postsecondary credit while still in high school—such as Advanced Placement (AP), International Baccalaureate (IB), dual or concurrent enrollment, or early college high schools;
 - Implementation of a schoolwide tiered model to prevent and address problem behavior and early intervening services, coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act (IDEA);
 - Professional development and other activities for teachers, paraprofessionals, and other school personnel to improve instruction and use of data from academic assessments, and to recruit and retain effective teachers, particularly in high-need subjects; and
 - Strategies for assisting preschool children in the transition from early childhood education programs to local elementary school programs.

3. Spend funds consistent with the school's needs and schoolwide plan.

Generally, a schoolwide school must be able to demonstrate a link between a school's needs, its schoolwide plan, and an activity Title I supported.

Because individual school needs vary, schoolwide schools have a significant opportunity to use Title I funds to address their specific needs, including activities such as:

- High-quality preschool or full-day kindergarten and services to facilitate the transition from early learning to elementary education programs;
- Recruitment and retention of effective teachers, particularly in high-need subjects;
- Instructional coaches to provide high-quality, school-based professional development;
- Increased learning time;
- Evidence-based strategies to accelerate the acquisition of content knowledge for English learners (ELs);
- Activities designed to increase access and prepare students for success in high-quality, advanced coursework to earn postsecondary credit while in high school—e.g., AP, IB, early college high schools, and dual or concurrent enrollment programs;
- CTE programs to prepare students for postsecondary education and the workforce;
- Counseling, school-based mental health programs, mentoring services, and other strategies to improve students' nonacademic skills;
- School climate interventions—for example, anti-bullying strategies, positive behavior interventions and supports (PBIS);
- Equipment, materials, and training needed to compile and analyze student achievement data to monitor progress, alert the school to struggling students, and drive decision making;
- Response-to-intervention (RTI) strategies intended to allow for early identification of students with learning or behavioral needs and to provide a tiered response based on those needs;
- Activities that have been shown to be effective at increasing family and community engagement in the school, including family literacy programs;
- Devices and software for students to access digital learning materials and collaborate with peers, and related training for educators—including accessible devices and software needed by students with disabilities; and

- Two-generation approaches that consider the needs of both vulnerable children and parents, together, in the design and delivery of services and programs to support improved economic, educational, health, safety, and other outcomes that address the issues of intergenerational poverty.⁷

Below are four scenarios of what schoolwide program spending might look like in practice.

Scenario #1: Title I to Support PBIS

A schoolwide program school had issues with student behavior. The school had high discipline referral rates, and teachers reported a range of concerns from students damaging school property, to fighting, and classroom outbursts. The school's planning team agreed these behavior issues were affecting student academic achievement and outcomes, and decided to implement a schoolwide system of PBIS.

The school used Title I funds to provide stipends to a team of teachers and building leaders to attend a multiday training program on PBIS, and then to work collaboratively to develop and implement new behavioral expectations and supports for students. The school also used Title I to pay for substitutes to provide release time for the teachers involved in developing the system.

The school could have used Title I for other PBIS costs as well, such as:

- An online data collection and analysis tool to identify problems and possible solutions;
- Coaches to help teachers implement the PBIS system, and
- Attendance initiatives and supports.

These are only some examples of the kinds of PBIS-related costs schoolwide schools could support with Title I.

Scenario #2: Collaborative Planning Time

After conducting a comprehensive needs assessment, a schoolwide program school identified a need for teachers to have more time to review data together, share effective practices, and design instruction collaboratively. The school's planning team decided this would be most effective if teachers could meet as grade-level teams regularly throughout the school year.

The school used Title I funds to reschedule the school day to incorporate music and art time for students, which had not been previously offered, giving regular classroom teachers time to meet.

The school could also have used Title I to:

- Extend the workday for teachers to incorporate collaborative planning time; and
- Pay for substitutes to give teachers release time to meet during the school day.

These are only some examples of the kinds of collaborative planning-type costs schoolwide schools could support with Title I.

⁷ U.S. Department of Education, Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program, pp. 4-5 (2016), available at <http://www2.ed.gov/policy/elsec/leg/essa/essaswpguidance9192016.pdf>.

Scenario #3: Upgrading the Curriculum

A schoolwide program school's data revealed a high percentage of second grade students were struggling in reading. Data analysis of later grades demonstrated that once children fell behind in second grade, they were unlikely to reach grade-level reading proficiency in subsequent years. The school decided to revamp the entire second-grade reading curriculum.

The school used Title I to purchase a multisensory structured language program for all second grade students and accompanying professional development for all second grade teachers. The school had used this reading program previously as an intervention tool for some of its struggling students, but decided it made more sense to use the program for all of its second graders because the overwhelming majority of them were struggling.

The school could have used Title I for other curricular upgrades and supports, such as:

- Robust professional development for teachers on meeting the instructional needs of students;
- Specialists to work with struggling students;
- Coaches to work with teachers;
- Curricular materials and tools; and
- Teachers.

These are only some examples of the kinds of curricular costs schoolwide program schools could support with Title I.

Scenario #4: Extending the School Day

A schoolwide middle school's data revealed that virtually all of the school's students were not reading on grade level. In addition, English language arts (ELA) teachers reported feeling rushed through the curriculum because a significant portion of their time was spent on helping students with basic reading skills. The school decided to add 45 minutes more instructional time to the school's ELA block to address these issues.

The school used a combination of Title I and local funds to add additional time to the school day. The primary cost supported by Title I and local funds was compensation for staffing time.

The school could have used Title I for other extended time initiatives and supports, such as:

- A partnership with an outside organization to provide after-school enrichment programming;
- Intensive tutoring for struggling students; and
- Summer school or adding additional weeks to the school calendar.

These are only some examples of the kinds of extended-day costs schoolwide program schools could support with Title I.

Supplement Not Supplant and Title I

Title I has a supplement not supplant (SNS) requirement. In general terms, this means that Title I funds should add to (supplement) and not replace (supplant) state and local funds.

Prior to ESSA, supplement not supplant was typically tested by applying “three presumptions of supplanting” to each cost supported with Title I funds. Under ESSA, compliance with SNS will no longer be tested through individual Title I costs,⁸ and these three presumptions **no longer apply**.

This does not mean supplement not supplant does not apply, or is no longer in effect. The expectation to supplement, not supplant funds is unchanged from NCLB to ESSA. Though, *testing* for supplanting will transition to a methodology-based compliance test as codified in ESSA. The transition to the methodology-based compliance test took place in SY 2018-19. Instead, LEAs must demonstrate that the methodology they use to allocate state and local funds to schools provides 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.⁹

This new test should expand Title I’s spending options—though costs must still be consistent with the purpose of Title I, and that is improving student achievement—and must still support eligible students among other requirements.

Title I, Part A Resources

- Title I, Part A statute: <https://legcounsel.house.gov/Comps/Elementary%20And%20Secondary%20Education%20Act%20Of%201965.pdf>
- Title I, Part A regulations: <http://www.ecfr.gov/cgi-bin/text-idx?SID=7e7706d97a3003fff0016af51d48be87&node=pt34.1.200&rgn=div5>
- U.S. Department of Education ESSA website—includes links to US ED guidance documents: <https://ed.gov/policy/elsec/leg/essa/index.html>

⁸ Under NCLB and previous versions of ESEA, a Title I supplanting violation was presumed if Title I paid for:

- 1) An activity required by federal, state, or local law,
- 2) An activity that was paid for with state or local funds in the prior year, or
- 3) The same services for Title I students that state and local funds support for non-Title I students.

⁹ Section 1118(b)(3)(A).