



# Chickasha Public Schools

## Title 1 Handbook

# Table of Contents

|                                                                                        |           |
|----------------------------------------------------------------------------------------|-----------|
| <b>INTRODUCTION.....</b>                                                               | <b>3</b>  |
| <b>ATTENDANCE AREAS AND TITLE I ALLOCATIONS.....</b>                                   | <b>4</b>  |
| <b>CERTIFICATION &amp; TEACHER SALARY ALLOWABILITY FROM TITLE I, PART A FUNDS.....</b> | <b>6</b>  |
| <b>COMPARABILITY OF SERVICES.....</b>                                                  | <b>6</b>  |
| <b>EQUIPMENT-TITLE, USE, MANAGEMENT, DISPOSITION.....</b>                              | <b>7</b>  |
| <b>EQUITABLE SHARE UNDER TITLE I, PART A.....</b>                                      | <b>11</b> |
| <b>FISCAL RULES.....</b>                                                               | <b>12</b> |
| <b>PARENT INVOLVEMENT.....</b>                                                         | <b>15</b> |
| <b>RETENTION OF RECORDS.....</b>                                                       | <b>17</b> |
| <b>SUPPLEMENT, NOT SUPPLANT.....</b>                                                   | <b>18</b> |
| <b>SCHOOLWIDE PROGRAMS.....</b>                                                        | <b>19</b> |
| <b>USES OF FUNDS.....</b>                                                              | <b>20</b> |
| <b>RESOURCES.....</b>                                                                  | <b>24</b> |

U.S. Department of Education - USDE

Oklahoma State Department of Education - OSDE and/or SEA

Chickasha Public Schools - LEA

## **INTRODUCTION**

The intent and purpose of Title I, Part A is to provide all children a significant opportunity to receive a fair, equitable, and high-quality education, and to close the achievement gaps.

Title I, Part A is the largest federal funding program that states receive. Oklahoma is awarded around \$150 million annually. 92% of this amount is subgranted, on a formula basis, to eligible Title I Local Educational Agencies (LEAs), 7% is reserved to carry out School Improvement requirements under Every Student Succeeds Act (ESSA), Section 1003, and 1% is reserved for the state administration of the grant.

### **Chickasha Public Schools: District Policy EL**

*District participates in and receives funds under Title I of the Improving America's Schools Act of 1994. District shall insure that Title I funds are used only as a supplement to those funds provided by the District from other sources and that Title I funds will not be used to supplant other District funds. District shall provide for equivalent teachers, administrators, and other staff as well as curriculum and instructional materials from District's non-Title I funds and shall only use Title I funds to supplement those services and materials otherwise provided by District.*

## **Attendance Areas and Title I, Part A Allocations**

### **Allocations Made by SEAs to LEAs**

The Elementary and Secondary Act (ESEA) of 1965, as amended by the Every Student Succeeds Act (ESSA) requires United States Department of Education (USDE) to calculate Title I, Part A allocations based on four formulas: basic, concentration, targeted, and Education Finance Incentive Grant (EFIG) grants for each LEA.

### **LEA Identification and Selection of School Attendance Areas and Schools**

"A local educational agency (LEA) shall use funds received under Title I, Part A only in eligible school attendance areas. The term "eligible school attendance area" means a school attendance area in which the percentage of children from low-income families is at least as high as the percentage of children from low-income families served by the LEA as a whole. The term "school attendance area" means, in relation to a particular school, the geographical area in which the children who are normally served by that school reside." *[ESSA, Section 1113(a)(1)-(2)]*

Each of the five sites in Chickasha Public Schools are Title I sites and are allocated federal funds.

### **Allocations of Title I Funds to School Attendance Areas and Schools**

Allocations to eligible school attendance areas to be served with Title I, Part A funds may be determined as follows:

#### **1) Site poverty rate is greater than or equal to the district average poverty rate.**

An LEA is not required to allocate the same per-child amount to each area or school. However, the LEA must allocate a higher per-child amount to areas or schools with higher poverty rates than it allocates to areas or schools with lower poverty rates.

In determining what per-pupil amount to allocate, the LEA should bear in mind the purpose of such funding: to enable children who are most at risk of not meeting the State's challenging student academic achievement standards. The per-child allocation amount must be large enough to provide a reasonable assurance that a school can operate a Title I program of sufficient size, scope and quality to achieve that purpose.

**2) Site poverty rate is at or above 35%.**

This is known as the “35% rule”, it may be applied at the LEA’s discretion, and if this rule is followed, funds must be allocated in rank order. The 75% rule must also be followed.

**3) Site poverty rate is below 35%.**

In this case the 125% rule must be applied: The LEA must allocate to all of its participating schools (not just to those below 35% poverty) a per pupil amount that is at least 125% of the LEA’s allocation per low-income child.

## **Certification and Teacher Salary Allowability from Title I, Part A Funds**

*ESSA, Section 1111(g)(2)(J)* requires a teacher who works in a program supported with Title I, Part A funds to meet applicable State certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification. In Oklahoma, teachers may obtain a License to teach, a Standard, Alternative or Emergency teaching certificate.

Chickasha Public Schools ensures that every teacher has appropriate certification and licensure requirements including Standard Teaching Certificate, Alternative Teaching Certificate, Emergency Teaching Certificate and Adjuncts.

Chickasha Public Schools will notify the parents of each student whose teacher does not meet Highly Qualified standards.

NOTE: Title funds will NOT pay for adjuncts who do not hold teaching certification for the grade level and subject areas in which the adjunct provides instruction.

## **Comparability of Services**

### **Comparability Requirement**

To ensure that funds made available under Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA) as amended by the Every Student Succeeds Act (ESSA) are used to provide services that are in addition to the regular services normally provided by a local educational agency (LEA) for participating children, the LEA must provide services in its Title I schools with state and local funds that are at least comparable to services provided in its non-Title I schools.

Chickasha Public Schools is a grade level district. We do not have multiple sites at the same grade level. Each of our sites is a Title I school.

## **Equipment – Title, Use, Management, Disposition**

### ***[EDGAR 80.32]***

#### **Title of Equipment**

(a) Title to equipment acquired under a Federal award will vest upon acquisition.

(1) Use the equipment for the authorized purposes of the project until funding for the project ceases, or until the property is no longer needed for the purposes of the project.

(2) Not encumber the property without approval of the Federal awarding agency or pass-through entity.

(3) Use and dispose of the property in accordance with paragraphs (b), (c) and (e) of this section.

(b) A state must use, manage and dispose of equipment acquired under a Federal award by the state in accordance with state laws and procedures.

#### **Use of Equipment**

(1) Equipment must be used in the program or project for which it was acquired as long as needed. When no longer needed for the original program or project, the equipment may be used in other activities supported by the Federal awarding agency, in the following order of priority:

(i) Activities under a Federal award from the Federal awarding agency which funded the original program or project; then

(ii) Activities under Federal awards from other Federal awarding agencies. This includes consolidated equipment for information technology systems.

(2) During the time that equipment is used on the project or program for which it was acquired.

(3) Notwithstanding the encouragement in § 200.307 Program income to earn program income, the non-Federal entity must not use equipment acquired with the Federal award to provide services for a fee that is less than private companies charge for equivalent services unless specifically authorized by Federal statute for as long as the Federal government retains an interest in the equipment.

(4) When acquiring replacement equipment, the non-Federal entity may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property.

**CPS Board Policy BB**

*The primary use of District facilities and/or equipment shall be for District's educational and extracurricular programs. However, the community is encouraged to use District facilities and/or equipment when appropriate. Upon approval by the Superintendent, district facilities and/or equipment shall be available for use by the community when such use does not conflict with District's educational and extra-curricular programs.*

**Management of Equipment**

Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part under a Federal award, until disposition takes place will, as a minimum, meet the following requirements:

(1) Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property (including the FAIN), who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

(2) A **physical inventory** of the property must be taken and the results reconciled with the property records at least once every two years.

(3) A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated.

(4) Adequate maintenance procedures must be developed to keep the property in good condition.

**CPS Board Policy BB** - *Each employee of District shall utilize reasonable means to preserve and maintain District's buildings, facilities, grounds, furniture, and equipment in good condition and to protect such items from loss.*

*All equipment purchased with federal funds shall be labeled in accordance with applicable law and regulations.*

CPS Grant Management Procedures Handbook states that the following information is included in inventory records:

- Serial or identification number
- Funding source
- Funding year
- Acquisition Date
- Location
- Cost
- Condition

### **Disposition of Equipment**

When original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, except as otherwise provided in Federal statutes, regulations, or Federal awarding agency disposition instructions, the non-Federal entity must request disposition instructions from the Federal awarding agency if required by the terms and conditions of the Federal award. Disposition of the equipment will be made as follows, in accordance with Federal awarding agency disposition instructions:

(1) Items of equipment with a current per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to the Federal awarding agency

(2) Except as provided in § 200.312 Federally-owned and exempt property, paragraph (b), or if the Federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current per unit fair-market value in excess of \$5,000 may be retained by the non-Federal entity or sold. The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the Federal awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the Federal awarding agency may permit the non-Federal entity to deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses.

(3) The non-Federal entity may transfer title to the property to the Federal Government or to an eligible third party provided that, in such cases, the non-Federal entity must be entitled to compensation for its attributable percentage of the current fair market value of the property.

(4) In cases where a non-Federal entity fails to take appropriate disposition actions, the Federal awarding agency may direct the non- Federal entity to take disposition actions.

*CPS Board Policy BB - When the Board determines that any real or personal property of District is no longer needed for District purposes, it may direct the disposal of such property by sale, exchange, lease, lease-purchase, sale and partial lease-back, or as otherwise allowed by law.*

## **Equitable Share under Title I, Part A**

### **Equitable Share Requirement**

Educational services and other benefits for private school children, teachers, and other educational personnel shall be equitable in comparison to services and other benefits for public school children, teachers, and other educational personnel participating in Title I, Part A services, and shall be provided in a timely manner. *[ESSA, Section 8501(3)(A)]*

If there are children from low-income families who reside in a participating Title I public school attendance area, and are enrolled in private elementary schools and secondary schools, then these children generate Title I, Part A funds. The public Local Educational Agency (LEA) shall engage in timely and meaningful consultation with appropriate private school officials, to serve eligible low-achieving private school children who reside in a participating Title I public school attendance area.

Chickasha Public Schools currently has one private school within our district boundaries, James Caraway Christian Academy. We consult with them annually to determine if they want to participate in our Title I, Part A services.

## **Fiscal Rules**

### **Maintenance of Effort (MOE)**

ESSA addresses the LEA's responsibility to maintain local funding. If an LEA fails to maintain fiscal effort, the State Education Agency may be required to reduce LEA's current year allocation. Calculations to determine MOE are done at the State level in compliance with Federal requirements.

*Chickasha Public Schools has implemented guidelines to ensure compliance with the federal fiscal requirement of supplement, not supplant. The purpose of the procedures is to ensure that the level of state and local support for programs remains at least constant and is not replaced by federal funds.*

(See the CPS Grant Management Procedures Handbook)

### **Crossing Fiscal Years**

"The general fund of any school district is hereby defined as a current expense fund and shall consist of all revenue or monies that can legally be expended within a certain specified fiscal year." [70 O.S. § 1-117]

### **Purchase Orders and Paid in Advance Services**

Oklahoma is a State that reimburses LEAs for federal expenditures. To qualify for reimbursement, all federal purchases must abide by the Oklahoma Statute 70 O.S. § 5-135(E) which stipulates that a Purchase Order (P.O) must be issued prior to any purchase, and full payment cannot be made in advance for services not rendered.

Chickasha Public Schools has established procedures for Procedures for Procurement. See CPS Grant Management Procedures Handbook and Board Policy.

### **Time Distribution Records**

Chickasha Public Schools will strive to keep all employees hired with federal or state sources with a single purpose and a sole funding source when possible. Such job responsibilities with funding source limitations will be duly noted on their job descriptions and communicated to the employee, their supervisor and district level staff.

See CPS Grant Management Procedures Handbook and Federal Programs: New Rule Regarding Time Distribution Records for Employees Paid with Federal Funds.

### **Types of Time Distribution Records**

All Local Educational Agencies (LEAs) receiving federal funds under ANY federal program (Title I, Part A; Title I, Part C-Migrant, Title I, Part D-Neglected/Delinquent, Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B; Title VI (Indian Ed Grant); Title IX, Part A-Homeless) are responsible for ensuring that all staff members maintain accurate time distribution records. All documentation must be signed by the employee and supervisor evidencing first-hand knowledge of the work performed under the federal program. A description and samples of the documentation required, based on the type of position/duties and reporting periods are listed below.

*Cost objective* means a program, function, activity, award, organizational subdivision, contract, or work unit for which cost data are desired and for which provision is made to accumulate and measure the cost of processes, products, jobs, capital projects, etc. 2 *CFR Part 200.28*

An appendix to the Code of Federal Regulations was published in August 2020 that modified the requirements for time and effort distribution.

*For an employee who works solely on a single cost objective (e.g., a single federal program whose funds have been consolidated but not with state and local funds), an LEA is not required to maintain records reflecting the distribution of the employee's salary and wages, including among the federal programs in the consolidation, if applicable.*

Schoolwide Title I schools are required to keep records by program, but the LEA is not required to maintain records for salary and wages of employees working on a single cost objective.

To ensure that required records are kept, while still avoiding the burden of maintaining salary and wage information pertaining to individual employees and in lieu of individual time distribution records for each employee, LEAs may maintain a table or spreadsheet indicating the names of the employees, the sites where those individuals work, and the single cost objective on which each such employee works. This applies only to employees supported with federal funds and working at school wide sites that do not consolidate federal funds with state and local funds.

### **Semi-annual Certification**

We will no longer require individual forms. We will develop spreadsheet to include the following information:

- Employee Name
- Job Title
- Federal Funding Source
- Location
- Reporting period

### **Personnel Activity Report (PAR)**

Completed for employees who work on multiple activities or cost objectives such as:

- more than one Federal award;
- a Federal award and a non-Federal award;
- an indirect cost activity and a direct cost activity;
- two or more indirect activities which are allocated using different allocation bases; or
- an unallowable activity and a direct or indirect cost activity. *2 CFR Part 200.430(i)(1)(vii)*
- Personnel Activity Reports:
  - meet the standards for documentation outlined in *2 CFR Part 200.430(i)(1)* unless other substitute system has been approved by the cognizant Federal agency;
  - must reflect an after-the-fact distribution of the actual activity of each employee;
  - must account for the total activity for which each employee is compensated;
  - must be prepared **at least monthly** and must coincide with one or more pay periods; and
  - must be signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee.

*Note: budget estimates or other distribution percentages determined before the services are performed do not qualify as support for charges to Federal awards but may be used for interim accounting purposes.*

## **Parent Involvement**

### **CPS Board Policy EL - Parental Involvement**

*District is committed to providing a quality education for every student in District. When schools and parents form strong partnerships, all students' potential for academic success improves significantly. District will have programs, activities, and procedures for the involvement of parents in all of its schools with Title I, Part A programs consistent with applicable federal law. These programs, activities, and procedures will be planned and operated with meaningful consultation with parents of participating students and will be incorporated in District's Title I Plan.*

### **Parent Involvement Set-aside**

Each LEA shall reserve at least 1 percent of its Title I, Part A allocation (including any funds that are transferred in) for the fiscal year for which the determination is made, to assist schools to carry out the activities for parent involvement, except when such allocation is less than \$500,000 the 1% is not mandatory. An LEA may reserve more than 1 percent of its allocation to assist schools to carry out parent involvement activities.

### **Parent Meetings – Title I, Part A**

"Each school served under Title I, Part A must convene an annual meeting, at a time convenient for parents to inform them of their school's participation in Title I, Part A programs, and to explain the Title I, Part A requirements and the right of parents to be involved in those programs. In order to keep parents informed, schools must invite to this annual meeting, all parents of children participating in Title I, Part A programs and encourage them to attend. Schools must offer a flexible number of additional parental involvement meetings, such as in the morning or evening so that as many parents as possible are able to attend." [ESSA, Section 1116(c)(1)-(2)]

Each LEA in Oklahoma must provide agendas, minutes and sign-in sheets during the Consolidated Monitoring performed by the Office of Federal Programs at OSDE, to indicate compliance with Section 1116 of ESSA.

### **Parents Right to Know Letter**

At the beginning of each school year, LEAs shall provide to each individual parent of a student who attends a school receiving Title I funds the "Parents-Right-to-Know" letter, notifying parents about:

- their right to request and receive (in a timely manner) information regarding the professional qualifications of the student's classroom teachers and paraprofessionals. [ESSA, Section 1112(e)(1)(A)]
- their child being assigned, or taught for 4 or more consecutive weeks by, a teacher who does not meet applicable State certification or licensure requirements at the grade level and subject area in which the teacher has been assigned [ESSA, Section 1112(e)(1)(B)(ii)]. This includes long-term substitute teachers listed as the teacher of record.

### **Notices to Parents of English Learners (ELs)**

Board Policy EL - Limited English Proficiency Instruction:

*District will provide a program of language instruction to students who have limited English proficiency. Student participation in any language instruction program or instruction in English as a second language is voluntary and parental permission is required...Non-English speaking parents will be provided with translations of this information in their native language.*

An LEA using Title I, Part A funds or Title III, Part A funds to provide a Language Instruction Educational Program (LIEP) must inform parents of an English learner, no later than 30 days after the beginning of the school year of: 1) the reasons for the child's identification as an English learner; 2) the child's level of English proficiency, how such level was assessed, and the status of the child's academic achievement; 3) the instructional methods used in the program; 4) how the program will meet the educational strengths and needs of their child; 5) how such program will help their child learn English and meet the academic achievement standards for grade promotion and graduation; 6) the specific exit requirements for the program; (vii) in the case of a child with a disability, how such program meets the objectives of the individualized education program of the child, as described in section 614(d) of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d)); and 7) information pertaining to parental rights.

Parents of English Learners have the right to decline the enrolment of their child in an LIEP program. The LEA must provide parents of EL students with written guidance, in an understandable and uniform format and, to the extent practicable, in a language that the parents can understand, detailing the right that parents have to immediately remove their child from such program upon their request, the options that parents have to select

another program or method of instruction, if available; and provide assistance to the parents in the selection of such programs and methods of instruction.

In Oklahoma, the OSDE has provided the English Language Academic Plan (ELAP) as a tool to be used by the LEAs to meet the requirements under ESSA, Section 1112(e)(3)(A).

Chickasha Public Schools has a contract with EduSkills to assist with Home Language Surveys, identifying students who need screening and/or additional assessment, Parent Notification Letters, English Language Academic Plan and Accreditation Reports.

## **Retention of Records**

(Board Policy BM)

### **Federal Funding and Grants**

- Records needed to support information provided on an application for federal funding (such as Impact Aid) or private grant.
- 3 years after fiscal year in which final payment received

See Board Policy for additional Retention of Records requirements.

## **Supplement, Not Supplant**

### **Compliance with the Supplement, not Supplant Requirement**

An LEA demonstrates compliance with the Title I, Part A supplement, not supplant requirement by using a methodology to allocate State and local funds to each Title I school that ensures that each school receives all the State and local funds it would otherwise receive if it were not receiving Title I funds. *[ESSA, Section 1118(b)(2)]*

### **Methodology - Cannot Be Prescribed by USDE or SEA**

Nothing in ESSA, Section 1118 shall be construed to authorize or permit the U.S. Department of Education Secretary to prescribe the specific methodology a local educational agency uses to allocate State and local funds to each school receiving assistance under Title I, Part A. *[ESSA, Section 1118(b)(4)]*

### **Methodology - Must Be Title I Neutral**

An LEA's methodology must be "Title I neutral" in that it allocates State and local funds to schools without regard for Title I status. This demonstrates that an LEA did not reduce the State and local funds made available to a Title I school because such a school is also receiving Title I, Part A funds.

### **Supplanting – No Longer on Individual Cost Basis**

No local educational agency shall be required to:

- A) identify that an individual cost or service supported under this part is supplemental;
- or
- (B) provide services under this part through a particular instructional method or in a particular instructional setting in order to demonstrate such agency's compliance with paragraph (1). *[ESSA, Section 1118(b)(3)(A)-(B)]*

Therefore, supplanting is no longer determined based on the individual cost or service paid with Title I, Part A funds. Rather, it is determined by the allocation of State and local resources to schools and whether such resources are allocated without regard to a school's Title I status.

## **Schoolwide Programs**

### **Criteria to Operate a Schoolwide Program**

If 40 percent or more students in a Title I, Part A school are from low-income families, the school may implement a schoolwide program. A schoolwide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school in order to improve the achievement of the lowest-achieving students by coordinating services funded from a variety of sources into a comprehensive framework. *[ESSA, Section 1114(a)(1)(A)]*

### **Schoolwide Consolidation of Funds – Participating Programs**

Consolidating Federal, State and local funds in a schoolwide program offers significant flexibility to a school to use all of its funds to meet the specific needs of its students identified through a needs assessment and included in the schoolwide plan.

A school implementing a schoolwide program may **consolidate funds** from Title I and other Federal education programs with State and local funds to use all of its funds to meet the specific needs of its students identified through a needs assessment and included in the schoolwide plan. *[ESSA, Section 1114(a)(1)(A)]*

A school that consolidates Federal funds in its schoolwide program is not required to meet most of the statutory and regulatory requirements of the specific Federal programs included in the consolidation. However, the school must ensure that it meets the intent and purposes of the Federal programs included in the consolidation so that the needs of the intended beneficiaries are met. *[ESSA, Section 1114(a)(3)(A); 34 CFR 200.29(a), (b), (d)]*

### **Schoolwide Waiver**

A State may grant a waiver for a school with fewer than 40 percent of students from low-income families to implement a schoolwide program if it will best serve the needs of students in the school who are failing, or at risk of failing, to meet the challenging State academic standards. *[ESSA, Section 1114(a)(1)(B)]*

LEAs may apply to the OSDE for this waiver by completing the “Schoolwide/Targeted Assistance Intention” page in the Consolidated Application in the Grants Management System (GMS).

## **Uses of Funds**

Although this is not a comprehensive list of allowable uses of funds, LEAs may use Title I, Part A funds to pay for personnel salaries (teachers, substitute teachers, librarians, counselors, paraprofessionals, instructional coaches, federal programs directors/coordinators, parent involvement coordinator, homeless coordinator), student instructional materials (software subscriptions to academic programs, computers, chromebooks, books, supplies, etc.), parent involvement materials, travel expenses to Title I related conferences, etc.

### **Administrative costs**

For the purpose of administering Title I, Part A program, LEAs may use these funds for administrative costs, which will be those incurred by the LEAs to carry out the administration, evaluation and technical assistance associated with this grant.

Administrative costs will be coded under function code 2330, and may encompass Title I administrative personnel's salaries (Title I director/coordinator, Title I secretary/claims clerk), Title I administrators' travel expenses to Title I related conferences, subscription to federal publications, etc.

*Oklahoma Statute 70 O.S. 18-1* allows administrative costs to be charged by LEAs in the amount of 5, 7 or 8% of their state allocation, and it is calculated based on the LEA's student Average Daily Attendance (ADA) as follows:

ADA less than 500 students 8%

ADA between 500-1500 students 7%

ADA greater than 1500 students 5%

The OSDE allows the same percentages to be applicable to the Title I, Part A allocation for administrative cost calculation purposes.

### **Concurrent Enrollment**

Under *ESSA, Section 8101(15)* the term dual or concurrent enrollment program means "a program offered by a partnership between at least one institution of higher education and at least one local educational agency through which a secondary school student who has not graduated from high school with a regular high school diploma is able to enroll in one or more postsecondary courses and earn postsecondary credit that—

(A) is transferable to the institutions of higher education in the partnership; and

(B) applies toward completion of a degree or recognized educational credential as described in the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.)."

### **Counselors**

Oklahoma Administrative Code 210:35-9-43 requires that all students receive counseling and guidance services from certified school counselors. The guidance program shall provide one counselor for a maximum of 450 students, with no school district having less than one half-time counselor with one exception: districts with fewer than 225 students may prorate the number of hours per week a certified school counselor is required by dividing the number of students enrolled by 450 and multiplying the quotient by 30.

If the state requirements have been met, then the salary of supplemental counselors is allowed to be paid with Title I, Part A funds.

### **Gift Cards**

The use of federal funds for purchasing prepaid store cards—i.e. retail/grocery stores, Amazon, I-Tunes, convenience stores, gas cards, etc. is not allowed under federal regulations. Because prepaid cards are considered “cash equivalents”, their use cannot be controlled, and their purchase does not meet the necessary and reasonable standard required by federal regulations. *[OMB Circular A-87 Appendix A, Part C, 1.a]*

### **Incentives from Title I, Part A**

“A local educational agency may reserve such funds as are necessary from those funds received by the local educational agency under title II, and not more than 5 percent of those funds received by the local educational agency under subpart 2, to provide financial incentives and rewards to teachers who serve in schools eligible under this section and identified for comprehensive support and improvement activities or targeted support and improvement activities under section 1111(d) for the purpose of attracting and retaining qualified and effective teachers. *[ESSA, Section 1113(c)(4)]*

Therefore, Title I, Part A funds may be used to pay incentives in Title I schools that have a designation of comprehensive support or targeted support, and only for teachers who have proof of being highly effective teachers.

Incentives paid with Title I, Part A funds may be offered to hire and retain those teachers who teach *in schools identified for comprehensive support and targeted support*, and have proof of being *highly effective*. (Hiring teachers who teach high need academic subjects is an incentive that can be paid with Title II, Part A funds, not with Title I, Part A funds.)

## **Librarians**

Title I, Part A funds may be used to pay for librarian salaries. However, schools must meet the state mandates before they are paid from Title I, Part A funds:

### **I. Elementary Schools (Standards for Schools)**

- a. Fewer than 300 students, the state mandates at least 1/2 certified librarian or 1/5 librarian + 1 Full Time Equivalency (FTE) library assistant.
- b. Between 300-499 students: 1 FTE librarian or ½ librarian and 1 FTE library assistant.
- c. For 500+ students: 1 FTE librarian + ½ library assistant.

### **II. Middle Schools/High Schools**

- a. Fewer than 300 students: at least ½ librarian
- b. 300 to 499 students: at least 1 FTE librarian or a ½ librarian + 1 FTE library assistant
- c. 500 to 999 students: at least 1 FTE librarian + ½ library assistant
- d. 1000 to 1499 students: at least 1 FTE librarian + 1 FTE library assistant
- e. 1500 plus students: at least 2 FT librarians

Under the ESSA flexibility, library assistants may be paid from Title I, Part A funds if they meet the Title I paraprofessional qualifications. They must be coded as paraprofessionals.

## **Membership fees**

Individual membership fees are not allowable from any federal funds. Paying for membership in a professional organization for an individual is a violation of the state law. There is no statutory authority to justify the payment of professional dues out of any funds other than the payroll deduction of a school district employee.

Oklahoma Statute, Title 70, Chapter 1, Article V, Sec. 5-139 stipulates that "School districts shall make payroll deductions for either or both professional organization dues and political contributions upon the request of any school employee and shall transmit deducted funds to the organization designated by the school district employee."

However, OMB A-87, Section 200.454(a) states that "Costs of the non-Federal entity's membership in business, technical, and professional organizations are allowable", which indicates that a school district can pay membership dues to professional organizations in the name of the school district.

## **Paraprofessionals**

It is allowable to pay paraprofessional salaries from Title I, Part A funds.

"Under Oklahoma law at 70 O.S. § 6-127A, a public school paraprofessional is an employee of a school district whose position is instructional in nature, or who delivers other direct services to students and/or their parents, and for which a certified teacher or other professional has the ultimate responsibility for the design, implementation, and evaluation of the individual educational programs or related services and student performance. Individuals must meet requirements established by federal and state law to be authorized to serve as public school paraprofessionals."

The required qualifications (Tier 1) for a general education paraprofessional are:

- 1) Has completed at least two (2) years of study at an institution of higher education, defined as completion of at least forty-eight (48) credit hours of college coursework; or
- 2) Has obtained an associate's degree or higher; or
- 3) Has either passed the Oklahoma General Education Test (OGET), obtained a National Career Readiness Certificate through successful completion of the ACT, WorkKeys assessment, or passed the ParaPro Assessment offered through the Educational Testing Service.

The Office of Federal Programs is ensuring that ALL paraprofessionals who work in a Title I A School (Targeted Assistance and Schoolwide), in general education or special education settings have proper qualifications. To obtain a credential/certificate from OSDE is not mandatory, but meeting one of the approved qualifications is mandatory in a Title I school.

## **Substitute Teachers**

Oklahoma Statute 70 O.S. § 6-105-B (effective 11/01/2019) stipulates that "no substitute teacher shall be employed for a total period of time in excess of one hundred thirty-five (135) school days during a school year; or one hundred forty-five (145) school days during the school year if the substitute teacher holds a lapsed or expired certificate or has a bachelor's level college degree; or no limit of school days during the school year if the substitute teacher holds a valid certificate.

## **RESOURCES**

- Oklahoma State Department of Education Federal Title 1 Handbook
- Chickasha Public School Board Policy
- Chickasha Public School Grant Management Procedures Handbook