



## Title I, Part A Guidance

Improving Basic Programs Operated by Local Education Agencies

### Introduction

The Every Student Succeeds Act of 2015 reauthorized the Elementary and Secondary Education Act of 1965's (ESEA) Title I, Part A (Title IA)—Improving Basic Programs Operated by Local Education Agencies (LEAs) program. The Title IA program aims to provide all children an opportunity to receive a fair, equitable, and high-quality education and close educational achievement gaps. Title IA provides financial assistance to LEAs and schools with high numbers or percentages of children from low-income families to help ensure all children meet Iowa's challenging academic standards.

### Subgrant Requirements and Recommended Actions

To receive a Title IA subgrant, the LEA must complete a list of requirements in the Consolidated Application for ESEA Title Programs, which is located in the Consolidated Accountability and Support Application's (CASA). Among these requirements, the LEA must submit a program application by October 15 of each year and reimbursement claims each quarter to the Iowa Department of Education (Department). For a full list of the subgrant requirements and recommended actions, please see the following table.

Table 1. Title IA Subgrant Requirements and Activities

ESEA Citation	Action
1117	<b>Engage in timely and meaningful consultation with the appropriate nonpublic school administrators within the LEA and complete the nonpublic consultation agreement for the upcoming school year by March 15.</b> For additional information on the equitable services procedure and process, see the following <a href="#">Equitable Service Requirements section</a> and the <a href="#">Equitable Services for Nonpublic School Students section of the ESSA Guidance and Allocations page</a> .
1113	<b>Complete Selection of Schools collection by May 1</b> , which allocates Title IA funds to eligible schools through a poverty-based procedure known as "rank and serving" (see the <a href="#">Title I, Part A Application Content Sheet</a> and the following Selection of Schools section). (The LEA must certify the School Information Update prior to completion.)
1112(e)	<b>At the beginning of the school year, notify parents that they may request information</b> about the professional qualifications of the student's classroom teachers and their student's achievement on Title IA assessments (if available and applicable; see the following Parents Right-to-Know section).
1117	<b>Before completing the Allocations and Transfers screen, complete and submit the reopened nonpublic consultation agreement for the head administrator's review. The head administrator must confirm the accuracy of the agreement by October.</b>
1114 & 1117(a)(4)(A)	<b>Complete the Set-Asides and Building Shares collection in the CASA by September 15</b> (see the <a href="#">Title I, Part A Application Content Sheet</a> and the following Set-Asides and Building Shares section).
1112(a)	<b>Before completing the program application, engage in timely and meaningful consultation</b> with teachers, principals, other school leaders, paraprofessionals, specialized instructional support personnel, charter school leaders (if applicable), administrators (including administrators of programs described in other parts of Title I), other appropriate school personnel, and with parents of children in Title IA schools (see the following Stakeholder Engagement section).

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ESEA Citation	Action
1112(a)	<b>Complete and submit the program application in the Consolidated Application by October 15, including completing program questions, assurances, and a budget.</b> See the <a href="#">Title I, Part A Application Content Sheet</a> and the following Program Application section.
1111(h)	<b>Report student achievement and other data</b> to the Department and the public.
1112(c)(5)(B)	<b>Collaborate with child welfare agencies to ensure the educational stability of children and youth in foster care.</b>
1113(c)(3)(A) & (C)	<b>Provide services to homeless children and youth.</b>
1113(c)(3)(A)(ii)-(iii)	<b>Provide services to neglected or delinquent children and youth in:</b> <ul style="list-style-type: none"> <li>• Local institutions for neglected children;</li> <li>• Local institutions for delinquent children, if appropriate; and</li> <li>• Community day programs.</li> </ul>
1111(d)	<b>Develop and implement plans to support and improve state-identified low-performing schools, if applicable.</b>
1116	<b>Develop family engagement policies and provide engagement services to parents and families</b> (see the following Parent and Family Engagement Requirements section).
1114 & 1115	<b>Annually review, revise, and evaluate the local schoolwide plans and targeted assistance plans.</b>
1117	<b>Provide equitable services to eligible nonpublic school students and their teachers and families and continue nonpublic consultation throughout the implementation and assessment of activities to ensure effective implementation and service delivery</b> (see the following Equitable Service Requirements section and the <a href="#">Equitable Services for Nonpublic School Students section of the ESSA Guidance and Allocations page</a> ).
2 CFR 200.328(a)	<b>Oversee Title IA activities in Title IA schools.</b>
1118(b)	<b>Ensure Title IA funds are supplementing and not supplanting.</b> Title IA funds must add to (supplement) and not replace (supplant) State, local, and Federal funds.
1118(a), 8521, & 8521(b)(1)	<b>Ensure Title IA and other ESEA funds comply with the local maintenance of effort requirements.</b> Maintenance of effort requires LEAs and AEAs to maintain a consistent floor of State and local funding for free public education from year-to-year.
1118(c)	<b>Confirm that State and local funds are used to provide services that are comparable between Title IA and non-Title IA schools</b> (see the following Comparability of Services section).
	<b>Complete and submit the first quarter reimbursement claim for Title IA in the CASA system between November 1 and November 30.</b>
	<b>Complete and submit the second quarter reimbursement claim for Title IA in the CASA system between January 1 and January 31.</b>
	<b>Complete and submit the third quarter reimbursement claim for Title IA in the CASA system between April 1 and April 30.</b>
8303	<b>Annually report nonpublic school services participation at the end of each fiscal year in the Consolidated Application by July 15.</b> Provide the unduplicated number of nonpublic school students participating in Title I, Part A programs by age span or grade level.
	<b>Complete and submit the fourth quarter reimbursement claim in the CASA system between June 1 and July 15.</b>

## Equitable Title IA Services for Eligible Nonpublic School Students

The LEA must engage in ongoing nonpublic consultation and provide Title IA services to eligible nonpublic school students, teachers, and families (ESEA § 1117). Nonpublic schools may decline to participate in equitable services. The LEA must:

- Annually offer equitable services to Title IA-eligible students within participating attendance zones who attend nonpublic schools. The LEA's Title IA allocation is based on census counts of all school-age children from low-income families who live in the LEA, not just those who attend public schools. Students that generate Title IA funds for nonpublic school services and students who are eligible to receive Title IA services may not always be the same.
  - Nonpublic school students that generate Title IA funds include low-income students residing in a served Title IA school attendance center.
  - Nonpublic school students eligible to receive Title IA services include students that are at-risk of not meeting Iowa's academic standards.
- Establish good communication and program coordination with the nonpublic schools within their LEA boundaries.
- After consultation with nonpublic school officials, design a Title IA program that meets the needs of nonpublic school students, teachers, and families. The LEA is responsible for planning, designing, implementing, and evaluating the Title IA program. It cannot delegate that responsibility to the nonpublic school or its officials.
- Nonpublic school officials are prohibited from ordering or purchasing materials and supplies needed for the Title IA program.
- Title IA services for nonpublic school students cannot be schoolwide programs.
- The Title IA program may serve students in different grades than those receiving Title IA services in public schools, so long as they are in the same grade span (elementary, middle, or high school).

Additional information is available in the [Title I, Part A of the Elementary and Secondary Education Act of 1965, as Amended by the Every Student Succeeds Act: Providing Equitable Services to Eligible Private School Children, Teachers and Families, updated non-regulatory guidance May 17, 2023](#).

## Stakeholder Engagement

Before completing the program application, engage in timely and meaningful consultation with:

- Teachers,
- Principals,
- Other school leaders,
- Paraprofessionals,
- Specialized instructional support personnel,
- Charter school leaders (if the LEA has charter schools),
- Administrators (including administrators of programs described in other parts of Title I),
- Other appropriate school personnel, and
- Parents of children in Title IA schools (ESEA § 1112(a)(1)(A)).

## Parents Right-to-Know

At the beginning of each school year, the LEA must notify the parents of each student attending a Title IA school that they may request and be provided timely information regarding the professional qualifications of the student's classroom teachers (ESEA § 1112(e)).

In addition, a Title IA school must provide each parent of a child who is a student in such school with information on the student's level of achievement and academic growth on each Title IA state academic assessment (if applicable and available) and timely notice that the student has been assigned (or has been taught for four 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.

## Parent and Family Engagement Requirements

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The LEA must:

- Involve parents in the planning, reviewing, and improving of parent and family engagement (formerly parental involvement) programs and policies.
- Develop the parent and family engagement policy developed based on parent input.
- Convene an annual meeting at a convenient time to explain the Title IA program requirements.
- Develop and distribute a school-parent compact.
- Set aside funds to support parent and family engagement activities. Requirements depend on the LEA's current year allocation:
  - If receiving more than \$500,000, the LEA must set aside at least 1% of its allocation for parent and family engagement activities. LEAs that receive more than \$500,000 should:
    - Determine their reservation (at least 1%);
    - Allocate at least 90% of the remaining funds to Title IA schools; and
    - Use any remaining LEA-level set-aside funds for LEA-level parental involvement.
  - If receiving \$500,000 or less, the LEA does not have to set aside a particular amount but must fulfill all the law's requirements.

Title IA schools must:

- Have a parent and family engagement policy;
- Have a school-parent compact;
- Hold an annual Title IA meeting and other flexibly scheduled meetings;
- Provide Title IA program information to parents;
- Build parent capacity; and
- Involve parents in developing policies and determining how the set-aside is spent.

## Program Application

### Selection of Schools

Each LEA that has an enrollment of 1,000 or greater must “rank and serve” its schools each year. This process is conducted in the Selection of Schools collection in the CASA, which opens in the spring of the previous school year and is finalized in the fall of the current school year.

Only qualifying schools are eligible to use Title IA funds and operate Title IA programs.

- All Title IA buildings must be served in rank order of poverty serving the highest poverty buildings first, either by grade-span groupings or by rank order:

Poverty Rate	Title IA Service Requirements
75%-100%	Schools with poverty rates at or above 75% must be served.
35%-74%	Schools at or above 35% poverty may be served.
0%-34%	Schools at or above the LEA-wide poverty percentage, if less than 35% poverty.

- If a LEA has only one building in a grade span, the building may be served regardless of the LEA-wide poverty percentage.
- Special exception for one year (grandfather year). For one additional year only, a LEA may allocate Title IA funds to a school that is no longer eligible but was eligible and served in the preceding year (ESEA § 1113(b)(1)(C)).

### Set-Asides and Building Shares

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Each year, before submitting the program application, the LEA must complete the Title IA, Basic Programs – Set-Asides and Building Shares collection in the CASA. It collects information about the LEA’s amounts for the required and optional set-asides and information to determine the building shares and amount available for services to participating nonpublic schools (see the [Title I, Part A Application Content Sheet](#)).

## Required Set-Asides

### *Required Homeless Set Aside*

Each LEA that receives Title IA funds must reserve funds to support and provide comparable services to homeless children and youth. This means that all LEAs—even LEAs that have not recently identified homeless students—must set aside funds for these students in the Set-Asides and Building Shares collection. These funds may be used to serve any homeless student in the LEA (PK-12) regardless of attendance at a Title IA or non-Title IA school. Homeless students are categorically eligible to receive Title IA services regardless of academic eligibility.

LEAs must establish a method for allocating Title IA set aside funds for homeless children and youth. Generally, these methods involve conducting a needs assessment for homeless students in the LEA or basing the amount on a formula, such as per pupil expenditure. Determining an appropriate amount requires coordination between the Title IA coordinator and the homeless education liaison (ESEA § 1113(c)(3)(C)). Title IA funds may support the work of the homeless education liaison.

Additional resources are available here:

- [Serving Homeless Students under Title IA](#)
- [Letter regarding Title IA reservation to serve homeless students](#)
- [Homeless Student Guidance](#) lists some specifically authorized services and outlines two general principles for using Title IA funds.

## Program Questions, Assurances, and Budgets

Each LEA must complete a Title IA program application each year. The program application consists of three required components: program assurances, program questions, and a budget (see the [Title I, Part A Application Content Sheet](#)). The program application must be developed after engaging in stakeholder consultation and, as appropriate, coordinated with other ESEA programs under the ESEA and education laws (e.g., Individuals with Disabilities Education Act, Rehabilitation Act of 1973, Carl D. Perkins Career and Technical Education Act of 2006, Workforce Innovation and Opportunity Act, Head Start Act, McKinney-Vento Homeless Assistance Act, Adult Education and Family Literacy Act).

### **Title IA Budget Hints**

- LEAs with a current year allocation of \$50,000 or more may carry forward up to 15% of the current year allocation ([ESEA § 1127](#)).
- LEAs may apply for an excess carryover waiver once every three years (ESEA § 1127).
- Remember the required set-asides (e.g., equitable services for eligible nonpublic school students, services for homeless children and youth, parent and family engagement).

## Allowable Activities

Schools that are eligible and receive Title IA funds must design and implement programs to support eligible Title IA students through a schoolwide or targeted assistance model. The models are described in the following sections.

### General Fiscal Requirements

#### **Reasonable, Necessary, and Allocable**

All costs charged to Title IA subgrants must be necessary, reasonable, and allocable and must consider the amount of money spent and the program's needs ([2 CFR 200.403\(a\)](#)).

### **Supplement, Not Supplant, Requirement**

All expenditures must also be supplemental (or in addition to what is required to be offered and what is currently offered). ESSA's method for testing compliance with this requirement differs from prior law. LEAs must demonstrate the methodology they use to allocate State and local funds to schools and provide each Title IA school with all the State and local money it would receive if it did not participate in the Title IA program. Additional information is available in the [Supplement Not Supplant Under Title I, Part A as amended by the ESSA non-regulatory informational document June 2019](#).

### **Time and Effort**

All employees charged to the Title IA subgrant must document their time working on the subgrant's objective to demonstrate that the amounts charged to federal programs are true and accurate (commonly referred to as Time and Effort).

### **Maintenance of Effort**

Maintenance of effort requires LEAs and AEA's to maintain a consistent floor of State and local funding for free public education from year-to-year. The LEA must 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 Department must reduce the LEA's allocation (using a measure most favorable to the LEA) under a covered program.

### **Comparability of Services**

A LEA must provide comparable services between Title IA and non-Title IA schools. LEAs must use October enrollment data to conduct the annual comparability analysis. LEAs need to make appropriate adjustments to staffing in Title IA and non-Title IA schools if the analysis demonstrates an issue with compatibility.

### **Targeted Assistance Programs**

Title IA funds may only be used to meet the needs of children in the greatest need of services. In a targeted assistance program, all costs must be supplemental (i.e., in addition to what is currently offered and what the LEA and school must offer) and limited to services for eligible students.

### **Eligible Children**

The population eligible for targeted assistance services under Title IA is children not older than age 21 who are entitled to a free public education through grade 12 and not yet at a grade level at which the LEA provides a free public education (ESEA § 1115(c)(1)(A)). From this described population, eligible children are children the school has identified as failing, or most at risk of failing, to meet the challenging State academic standards based on multiple, educationally related, objective criteria established by the LEA and supplemented by the school, except that children from preschool through grade two must be selected solely based on criteria based on, including objective criteria, established by the LEA and supplemented by the school (ESEA § 1115(c)(1)(B)).

Eligible children also include special populations such as:

- Head Start children (see the following Title IA Preschools section);
- Migratory children and youth;
- Neglected and delinquent children and youth; and
- Homeless children and youth (ESEA § 1115(c)(2)).



NOTE: The LEA cannot use Title IA funds to provide services that are otherwise required by law to be made available to children but may use the funds to coordinate or supplement such services (ESEA § 1115(c)(3)).

## Schoolwide Programs

Title IA funds are used to upgrade the entire educational program in a school, and all students may benefit from the use of Title IA funds. Activities must be part of the schoolwide plan and support an identified academic need through the school’s comprehensive needs assessment (ESEA § 1114).

For more information, see the [Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program non-regulatory guidance, September 2016](#).

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

To consider moving from a targeted assistance to a schoolwide service delivery method, a Title IA school must reach the 40% poverty threshold and spend up to a school year of planning. During the planning year, the Title IA school must form a schoolwide planning team that involves parents, community members, and those who will carry out the plan (e.g., teachers, principals, school leaders). The plan must contain elements described in [Public Law 114-95](#) (ESEA § 1114).

### Title IA Preschools

- Title IA preschools must follow the Head Start Standards.
- A school that operates a schoolwide program may use Title IA funds to establish or enhance preschool programs for children under six years of age (ESEA § 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 § 1114(7)(A)(iii)(V)).
- Targeted assistance programs may serve preschool students (ESEA § 1115(c)(2)(B)).

For more information, see the [Serving Preschool Children Through Title I, Part A of the Elementary and Secondary Education Act of 1965, as Amended non-regulatory guidance, February 2024](#).

## Use of Funds

All Title IA expenses must be reasonable, necessary, allowable, and aligned with the program purpose. Tables 2 and 3 provide examples of potential costs that are allowable and unallowable to support Title IA. The examples listed are not exclusive and are only a sampling of possible activities.

Table 2. Allowable Title IA Expense Examples

Area	Allowable Expenses Example(s)
Providing Additional Academic Support for At-Risk Students	<ul style="list-style-type: none"> <li>• Certified teachers and teaching assistants for Title IA programs</li> <li>• Other professional staff providing supplemental services (e.g., counselors, social workers)</li> <li>• Proportional benefits for Title IA salaries</li> <li>• Equitable services for nonpublic school students</li> <li>• Title IA preschool, Title IA summer school, Title IA extended day program</li> <li>• Transportation for Title IA extended day and summer programs not otherwise available</li> <li>• Salary of the <a href="#">homeless education liaison performing the related duties</a></li> </ul>
Funding Support Staff for Title IA Programs	<ul style="list-style-type: none"> <li>• Data management staff for Title IA only</li> <li>• Secretary or clerks for Title IA only</li> <li>• Title IA coordinators</li> <li>• Stipends for principals outside contract hours</li> <li>• Nurses for summer and extended day Title IA programs</li> </ul>

Area	Allowable Expenses Example(s)
Title IA Program Supplies and Materials	<ul style="list-style-type: none"> <li>• Supplemental instructional materials</li> <li>• Computer aided instruction software for academic intervention services (AIS)</li> <li>• Diagnostic and progress monitoring materials</li> <li>• Title IA data management software</li> <li>• Nutritional snacks for Title IA students during extended day and summer programs</li> <li>• Technology to upgrade the educational program of a schoolwide program</li> </ul>
Title IA Parent and Family Engagement	<ul style="list-style-type: none"> <li>• Parent and Family liaison or coordinator</li> <li>• Consultants for parent engagement</li> <li>• Stipends for staff to plan for or participate in Title IA activities outside contract hours</li> <li>• Costs for activities including materials, transportation, childcare, and light refreshments</li> </ul>
Title IA-Aligned Professional Development	<ul style="list-style-type: none"> <li>• Stipends and/or substitutes for staff in TIA Buildings only</li> <li>• Educational consultants working with TIA support staff</li> <li>• Reasonable supplies and materials for professional development</li> <li>• Must be aligned with Title IA program goals and provide direct implementation training</li> <li>• Conference costs are rarely allowable</li> <li>• Must meet State and <a href="#">Federal guidelines for professional development (ESEA § 8101(42))</a></li> </ul>
Transportation	<ul style="list-style-type: none"> <li>• Transportation for Title IA extended day and summer programs not otherwise available</li> <li>• Incremental cost of homeless transportation to and from school of origin</li> </ul>

Table 3. Examples of Unallowable Title IA Expenses

Area	Unallowable Expenses Example(s)
Core Instruction or Mandated Services	<ul style="list-style-type: none"> <li>• Teachers providing core instruction</li> <li>• Base pay for principals (contract hours)</li> <li>• Superintendents and administrators with LEA-wide responsibilities</li> <li>• Special education services (e.g., occupational therapist, physical therapist, speech therapist)</li> <li>• Mandated school counselors, nurses, etc.</li> <li>• Direct reimbursements to nonpublic schools</li> <li>• Costs for standardized screening to determine student eligibility for Title IA services</li> <li>• Costs for administering, scoring, and reporting results for mandated state assessments</li> </ul>
Food, Supplies, and Materials	<ul style="list-style-type: none"> <li>• Food and refreshments for staff activities, including working lunches</li> <li>• Costs for basic reading series or materials for core instruction</li> <li>• Promotional items (e.g., T-shirts, caps, tote bags, imprinted pens, keychains, magnets, stress balls)</li> <li>• Door prizes, movie tickets, gift certificates/cards, passes to amusement parks, etc.</li> <li>• Ceremonies, banquets, or celebrations</li> </ul>
Short-Term Professional Development	<ul style="list-style-type: none"> <li>• Professional development that is stand-alone, one-day, or short-term workshops not aligned to a schoolwide plan or school improvement initiative</li> </ul>
Other	<ul style="list-style-type: none"> <li>• Field trips for entertainment or recreational purposes only</li> <li>• Construction, remodeling, or renovation</li> </ul>

## Questions and Additional Guidance

For program contact information and resources, please see the Department's [ESSA Guidance and Allocations](#) and [Consolidated Application for ESEA Title Programs Requirements and Deadlines](#) pages.

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