



## 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 (here forward “school districts”) and schools with high numbers or percentages of children from low-income families to help ensure all children meet Iowa’s challenging academic standards.

### Grant Requirements

To receive Title IA funds, a school district must complete several requirements, including submitting an application to the Iowa Department of Education (Department) in the Consolidated Accountability and Support Application (CASA) each year and reimbursement claims each quarter. For additional information on the requirements, please see Table 1.

Table 1. Title IA Grant Requirements and Activities

ESEA Citation	Activities. <i>Related Resource.</i>
1117	<b>Engage in nonpublic consultation and complete the preliminary nonpublic consultation agreement for the upcoming school year.</b> See the <a href="#">nonpublic consultation agreement content sheet</a> and the following <i>Equitable Services</i> section.
1113	<b>Complete Selection of Schools collection</b> , which allocates Title IA funds to eligible schools through a poverty-based procedure known as “rank and serving.” See the following <i>Selection of Schools</i> section.
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 <i>Parents Right-to-Know</i> section.
1117	<b>Engage in nonpublic consultation and finalize the nonpublic consultation agreement for the current school year.</b> See the <a href="#">nonpublic consultation agreement content sheet</a> and the following <i>Equitable Services</i> section.
1114 & 1117(a)(4)(A)	<b>Complete the Set-Asides and Building Shares collection in the CASA.</b> See the <a href="#">Set-Asides and Building Shares content sheet</a> and the following <i>Set-Asides and Building Shares</i> section.

ESEA Citation	Activities. <i>Related Resource.</i>
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 <i>the following Stakeholder Engagement section.</i>
1112(a)	<b>Fill out the Consolidated Application, including completing program questions, assurances, and a budget.</b> See the <a href="#">Title I, Part A Application Content Sheet</a> and the following <i>Program Application section.</i>
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 and 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.</b>
1116	<b>Develop family and family engagement policies and provide parents and families engagement services.</b> See <i>the following Parent and Family Engagement Requirements section.</i>
1114 & 1115	<b>Annually review, revise, and evaluate the local schoolwide plans and targeted assistance plans.</b>
1117	<b>Provide equitable services to eligible private school students, teachers, and families.</b> See the <a href="#">nonpublic consultation agreement content sheet</a> and the following <i>Equitable Services section.</i>
2 CFR 200.328(a)	<b>Oversee Title IA activities in Title IA schools.</b>
1118(a)-(c) & 8521	<b>Ensure Title IA funds meet all fiscal requirements:</b> <ul style="list-style-type: none"> <li>• <b>Ensure Title IA funds supplement and not supplant</b> (i.e., add to and not replace) other local, state, and federal funds.</li> <li>• <b>Ensure funds comply with the local maintenance of effort requirements.</b></li> <li>• <b>Confirm state and local funds are used to provide services that are comparable between Title IA and non-Title IA schools.</b></li> </ul> <p><i>See the following Fiscal Requirements section.</i></p>

## Selection of Schools

Each district 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:

- 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 district-wide poverty percentage, if less than 35% poverty.

If a district has only one building in a grade span, the building may be served regardless of the district-wide poverty percentage.

Special exception for one year (grandfather year). For one additional year only, a district 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)).

## Parents Right-to-Know

At the beginning of each school year, the district 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

The school district 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 district's current year allocation:
  - If receiving more than \$500,000, the district must set aside at least 1% of its allocation for parent and family engagement activities. Districts 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 district-level set-aside funds for district-level parental involvement.
  - If receiving \$500,000 or less, the district 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.

## Set-Asides and Building Shares

Each year, before submitting the program application, the district must complete the Title IA, Basic Programs – Set-Asides and Building Shares collection in the CASA. It collects information about the district'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 [Set-Asides and Building Shares content sheet](#)).

### REQUIRED SET-ASIDES

#### *Required Homeless Set Aside*

Each district that receives Title IA funds must reserve funds to support and provide comparable services to homeless children and youth. This means that all districts—even districts 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 district (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.

Districts 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 school district 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.

## Equitable Title IA Services for Eligible Private School Students

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

- Annually offer equitable services to Title IA-eligible students within participating attendance zones who attend private schools. A district's Title IA allocation is based on census counts of all school-age children from low-income families who live in a district, not just those who attend public schools. Students that generate Title IA funds for private school services and students who are eligible to receive Title IA services may not always be the same.
  - Private school students that generate Title IA funds include low-income students residing in a served Title IA school attendance center.
  - Private school students eligible to receive Title IA services include students that are at risk of not meeting academic standards.
- Establish good communication and program coordination with the private schools within their district boundaries.
- After consultation with private school officials, design a Title IA program that meets the needs of private school students, teachers, and families. The district is responsible for planning, designing, implementing, and evaluating the Title IA program. It cannot delegate that responsibility to the private schools or their officials.
- Private school officials are prohibited from ordering or purchasing materials and supplies needed for the Title IA program.
- Title IA services for private 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 [ESSA fiscal and equitable services guidance](#).

## 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 district 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)).

## Program Application

Each district 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 [Title I, Part A Basic Application Content](#)). 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).

### FISCAL REQUIREMENTS

#### *Reasonable and Necessary*

All costs charged to Title IA grants 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 and Not Supplant*

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. Districts 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.

#### *Time and Effort*

All employees charged to the federal grant must document their time working on the grant'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 districts and AEAs to maintain a consistent floor of state and local funding for free public education from year-to-year. A district 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 district fails to maintain effort in a given fiscal year, the Department must reduce the district's allocation (using a measure most favorable to the district) under a covered program.

#### *Comparability of Services*

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

### Budget Hints

- Districts with a current year allocation of \$50,000 or more may carry forward up to 15% of the current year allocation (ESEA § 1127).
- Districts may apply for an excess carryover waiver once every three years (ESEA § 1127).
- Remember the required set-asides (e.g., equitable services for eligible private 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.

### 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 district 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 district 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 district 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 district 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: Funds received under this part cannot be used to provide services that are otherwise required by law to be made available to children but may be used 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 guidance](#).

#### 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)).

## 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. Examples of Allowable Title IA Expenses*

Area	Allowable Expenses Example(s)
<b>Providing Additional Academic Support for At-Risk Students</b>	<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 private 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 homeless education liaison performing <a href="#">the related duties</a></li> </ul>
<b>Funding Support Staff for Title IA Programs</b>	<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>
<b>Title IA Program Supplies and Materials</b>	<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>
<b>Title IA Parent and Family Engagement</b>	<ul style="list-style-type: none"> <li>• Parent 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>
<b>Title IA-Aligned Professional Development</b>	<ul style="list-style-type: none"> <li>• Stipends and/or substitutes for staff</li> <li>• Educational consultants</li> <li>• Reasonable supplies and materials for professional development</li> <li>• Must be aligned with Title IA program goals</li> <li>• Conference costs that <a href="#">meet state and federal guidelines</a></li> </ul>

Area	Allowable Expenses Example(s)
<b>Transportation</b>	<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)
<b>Core Instruction or Mandated Services</b>	<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 districtwide 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 private 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>
<b>Food, Supplies, and Materials</b>	<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)</li> <li>• Door prizes, movie tickets, gift certificates, passes to amusement parks, etc.</li> <li>• Ceremonies, banquets, or celebrations</li> </ul>
<b>Short-Term Professional Development</b>	<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>
<b>Other</b>	<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

If you have questions, please contact Jillian Dotson at [jillian.dotson@iowa.gov](mailto:jillian.dotson@iowa.gov). For additional Title IA guidance and resources, see the [Title IA heading](#) on the Department's [ESSA Guidance and Allocations page](#).