Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA) provides local education agencies (LEAs or school districts) with extra resources to help improve instruction in high poverty schools and ensure that all children have a fair, equal and significant opportunity to obtain a high-quality education and to reach, at a minimum, proficiency on challenging state (local) academic standards and assessments. The No Child Left Behind Act of 2001 (NCLB) Public Law 107-110, Improving Basic Programs Operated by Local Educational Agencies is the governing legislation for Title I programs.

Please submit the Title I application via the Title I electronic Internet application. Use the information within this document for step-by-step instructions and specific application and program guidance.

The user is reminded that all required information must be accurately completed and approved by State Title I staff before funds can be released to the LEA. A complete application consists of each applicable form as outlined in the following pages. Application accuracy means timely approval.

**TITLE I APPLICATION ACCESS**

Title I application is found through Iowa Education Portal at [https://portal.ed.iowa.gov](https://portal.ed.iowa.gov)

**TIP:** Use Internet Explorer 10, Firefox or Chrome for your browser.

The Iowa Education Portal provides one common location for Department of Education applications, serving as a ‘one stop shop’ for sign-in and security shared by many applications. The Enterprise A&A (Authentication & Authorization) service will be used to sign you into the Iowa Education Portal. Please keep your email address associated with your A&A account up to date! To verify your email address or to make a change, go to the “Sign In” page for A&A, put in your User ID and password and then click “Account Details.” This will allow you to make updates to name, phone number, and email address. Everyone who needs to access an Iowa Department of Education application site will need an A&A Account. Only one A&A Account per person is needed, even if you access applications from more than one district. Failure to keep this information current may result in an inability to access your applications.

You may confirm an A&A Account existence, by going to [https://portal.ed.iowa.gov](https://portal.ed.iowa.gov), highlighting “A&A Account,” selecting “Sign In” and clicking on “Forgot Password” or “Forgot ID.” **Note:** If you believe there is a possibility you have a login ID, please confirm beforehand before signing up for a new login.

If you need to get an A&A Account, go to the Iowa Department of Education homepage: [educateiowa.gov](http://educateiowa.gov); highlight “Data & Statistics” and click on “Iowa Education Portal.” Highlight “A&A Account” and then click on “Create Account” and select the “Create An Account” tab on the next screen. Enter your first name and last name and click “Register”.

The Single Sign On (SSO) Registration page consists of Account ID, First Name, Last Name, and Email. You will only need one A&A Account, even if you need access to multiple Education Portal applications or need access for more than one organization. The Account ID name is for

Individual use, not groups. No sharing of logins or passwords. An email address can only be used once and should be your work-related email. The closer your login name can resemble your actual name will aid in the identification and permissions process. A&A will create an Account ID with the tag of @IOWAID at the end. You should enter the entire Account ID (including the “@IOWAID” suffix) when logging in. The Account ID is not case-sensitive.
Spaces and most special characters are not allowed. All invalid characters will be stripped from the Account ID. Special characters allowed are: underscore (_); hyphen (-); plus sign (+); and period (.)

Once you have checked the information for accuracy, click “Save Account Details.” A message box will appear stating you are creating a new account. Press "OK" to continue. The Account ID will be your login ID for all A&A applications. In accordance with State security requirements, access to applications and the permissions granted therein are bound to an individual, not a collection of users.

To begin, go to https://portal.ed.iowa.gov. The Iowa Department of Education Iowa Education Portal site will appear. On the blue navigation menu bar, hover over “A&A Account” and click on “Sign In.” On the “Sign In” tab, enter your Account ID (email address) and password to sign into DOE – Education Portal. Click the “Sign In” button. **Note:** If you need guidance on using the Iowa Education Portal, click on “EdPortal Navigation” and review the short tutorial.

The EdPortal home page will appear. Note the descriptions of the home page regions:
- **Session Details** (top right of banner): User information including the logged-in user’s username, a link to the user’s profile, and a Logout button that ends the user’s session.
- **Organization Menu** (below Session Details): A dropdown menu that allows you to choose between different security organizations (if applicable) and view accessible information and applications (based on your role within each application) for that organization only.
- **Global Navigation Menu** (blue navigation menu bar): A list of links to Portal and Iowa Department of Education applications. The items in this menu may be different, based on your user permissions and/or the selected organization (chosen from the organization menu).
- **Application Submenu** (below Global Navigation Menu): An application in this menu that has an arrow next to the link will contain a submenu, which will contain links to additional topics or pages relevant to the application.

Applications, roles, and organization information can be found in the My Profile section of EdPortal. Assigned applications appear in the navigation menu bar, changing the organization listed in the organization menu may change the application names displayed. Click the application name in the navigation menu to open the Title I application. A&A related questions may be directed to: **ITE.Servicedesk@iowa.gov; 515.281.5703 or 800.532.1174.** EdPortal specific questions may be directed to: **Ed.portal@iowa.gov.**

The user may access the 2013-2014 Title I application by choosing “Title I State Prior to School Year 2014-15” from the EdInfo menu.

The due date for submission of the Title I electronic Internet application is September 30, 2014.

The user may exit the application process at any time by clicking on the Logout link in the Portal banner at the top of each screen.

**ACRONYMS**

The following is a list of acronyms used in this Manual.

- **AEA** - Area Education Agency
- **AFDC** - Aid to Families of Dependent Children
- **APR** – Annual Progress Report
- **AYP** – Adequate Yearly Progress
- **BEDS** – Basic Educational Data Survey
- **CFDA** – Catalogue of Federal Domestic Assistance
- **CFR** – Code of Federal Regulations
- **COE** - Certificates of Eligibility
- **CSD** - Community School District
- **CSIP** – Comprehensive School Improvement Plan
The following is an explanation of terms, abbreviations, and definitions associated with the Title I Annual Application. Read them carefully before using this reference manual.

**Fiscal**

**Allocation (LEA)** – Amount of new Title I money allowed to an LEA. For LEAs with populations of 20,000 or more, allocation is made directly from the U.S. Department of Education on the basis of census poverty data and reduced for State administration funds. For LEAs with populations under 20,000, the U.S. Department of Education allocation is recomputed on the basis of the average of October free lunch counts and low-income revenue data.

**Amendment** – Must be filed electronically when the approved budget figures, on any project budget, change for any reason. Please note that this process must be followed in order for funds, approved in the budget but unspent at the end of the project year, to become available as carryover for the following school year.

**Approved Amount** – Total budget amount that an LEA will expend in a project year—equal to or less than the allocation.

**Basic Grant** – Funds allocated to LEAs to provide supplemental reading and mathematics programs in an LEA; accounts for the largest portion of the LEA’s current allocation.

**Carryover Allocation** – Funds allocated for the previous fiscal year, but not applied for by the LEA in the previous school year budget, that are used in the following school year. These funds must be in excess of $1,000 and are limited to 15% of a current allocation in excess of $50,000.

**Concentration Grant** – Funds allocated to LEAs with high concentrations of low-income. Funds become part of current allocation and separate accounting is not necessary.

**Current Allocation** – Funds allocated for the present fiscal year.

**Detail Budget** – The form on the Title I Internet Application where the LEA itemizes budget expenditures.

**Education Finance Incentive Grant** – Funds allocated to LEAs on the basis of low-income and state-demonstrated effort and equity factors. Funds become part of current allocation and no separate accounting is necessary.

**Excess Carryover Funds** – Funds exceeding the maximum 15% allowed for carryover into the next fiscal year. LEAs may choose to carry over up to 15% of their allocation into the following school year. Once every three years a waiver for
Excess carryover funds can be approved. Please note that there is no limitation on carryover for LEAs with an allocation less than $50,000.

**Expenditures** – The costs associated with operating a Title I program. Any Title I expenditures must be supplemental to the regular educational program.

**Final Financial Report** – Must be filed electronically by clicking “Finalize Budget” button on the appropriate budget form to declare project complete and approved budget figures as actual expenditures.

**Fiscal Year (FY)** – The budget period beginning July 1 and ending the following June 30.

**Fixed Charges** – The benefits, such as FICA, IPERS and Insurance, allowed on the Title I budget.

**General Budget** – The form on the Title I Internet Application where the LEA applies for Title I current allocation funds.

**General Carryover** – The form on the Title I Internet Application where the LEA applies for Title I carryover allocation funds.

**Hold-Harmless Amount** – Guaranteed level of funding at variable rate of 95-85% of the previous year funding, based on the percent of poverty in the LEA. Only applies if SEA receives adequate funding to meet hold-harmless level of funding.

**Indirect Costs** – A maximum amount used from the LEA allocation for costs related to the Title I program that are in compliance with OMB Circular A87. The maximum amount is determined by applying the LEA indirect cost percentage, computed annually by the SEA, to the salary and benefit cost applied for in the Title I budget. Please note that for Title I purposes, the given fiscal year indirect cost rate applies to the project established for the school year and remains in place even when project expenditures extend into the next fiscal year.

**Project Year** – The period that covers the school year program without respect to the fiscal year.

**Reallocated Funds** – Excess carryover or unspent prior year funds available by the State Title I office to eligible LEAs.

**Eligibility** is based on increased poverty levels and greatest need as determined by the Title I office.

**Sequestration** – A procedure by which automatic spending cuts are triggered at the federal level on all discretionary funding, including Title I.

**Supplemental** – Title I expenditures must be in addition to, not in place of, the regular educational program.

**Targeted Grant** – Funds allocated to provide increased grants per poverty child as the percentage of economically disadvantaged children in a school district increases. Funds become part of current allocation and no separate accounting is necessary.

**Title I Internet Application** – The process whereby LEAs apply electronically for Title I funds by completing a multi-form application at https://portal.ed.iowa.gov. There is no longer a paper Title I application form.

**EVALUATION AND TITLE I ASSESSMENT**

All Iowa public school districts and schools are required to annually report to the Iowa Department of Education under the No Child Left Behind Act of 2001 (NCLB) to determine if local public school districts and schools made Adequate Yearly Progress (AYP) by meeting State reading and mathematics goals in grades 4, 8, and 11 for all students and subgroups, as well as participation, attendance, and high school graduation rate requirements.

**Program**

**Activity** – A component that is designed to help disadvantaged children meet high standards. (Reading, Mathematics, Early Childhood, Extended Day, Extended Year, etc.)

**Adequate Yearly Progress (AYP)** – This is a measure of progress in student achievement over time. School districts must demonstrate that they are meeting incremental goals each year in order to reach the ultimate goal of 100% of students proficient by year 2014.

**Annual Progress Report (APR)** – Local education agencies (LEAs), both public and accredited private schools, are required to develop a report that is provided to the public and to the Iowa Department of Education by September 15 each year. Title I students are included in the data provided by this report.

**Comprehensive School Improvement Plan (CSIP)** – Once every five years LEAs must develop a plan of improvement. Information about Title I programming, including but not limited to: parent involvement, staff development, and coordination with other programs, selecting students for service, and Title I service delivery should be incorporated into this LEA plan.

**Elementary and Secondary Education Act (ESEA)** – The Federal legislation originally enacted in 1965 that includes Title I programs. This legislation is re-authorized approximately every five years. In 2001 it was reauthorized as the No Child Left Behind Act (NCLB).

**Eligible student** – A student who is failing or most at risk of failing to meet locally determined educational standards is a student eligible for Title I services. Each LEA must develop a process for determining student eligibility. Students in grades K-2 may be selected using teacher recommendation with documentation, parental input, and developmentally appropriate measures. Eligibility in grade three and above must be determined by educationally objective criteria.

**Homeless Children Provision** – A child who is homeless and attending any school served by the LEA is eligible for services under this provision.
Limited English Proficiency (LEP) - Students who are learning English as a second language and need additional assistance in mastering the English language are categorized as LEP. These students may be served in both English as a second language programs and in Title I programs. However, Title I may not replace ESL instruction.

Local Delinquent Program – Local education agencies that have a public or private residential facility, that is operated for the care of children who have been adjudicated to be delinquent or in need of supervision, within the LEA geographic boundaries may receive additional Title I delinquent funding to provide for the education of these students. This is a separate pool of funds and a separate budget for delinquent programs is required on the Title I electronic Internet application.

Local Neglected Program – LEAs that have a public or private residential facility, other than a foster home, that is operated for the care of children who have been committed to the facility or voluntarily placed in the facility under applicable state law due to abandonment, neglect or death of their parents or guardians, within their geographic boundaries may receive additional Title I funding to provide for the education of these students. These funds are itemized in the general budget on the Title I electronic Internet application.

Migrant Education Program – Educational programs funded by Title I migrant funds. These federal funds are a separate funding stream and are provided by the State Title I office to LEAs with high percentages of migrant students.

Migrant Student - A migrant student is defined as a school-aged child whose parent or guardian has moved to a different school district within the last three years for the purpose of working in the agricultural industry on a seasonal or temporary basis.

No Child Left Behind (NCLB) – The 2001 reauthorization of ESEA is called No Child Left Behind. It replaced the Improving America’s Schools Act (IASA) of 1994.

Parent Compact – Each Title I building must develop a compact in collaboration with parents. This compact must be distributed to all parents of Title I students. In a building with a schoolwide program, every parent should receive the compact.

Parent Involvement Policy – LEAs utilizing Title I funds must have a parent involvement policy. (See Parent Document in Appendix Section of this reference manual.)

Private School Title I Services – Accredited private (non-public) schools can choose to receive Title I services for eligible students. The public school district in which the private school is located provides the services. (See section on Targeting of Funds in this reference manual for the formula to use to determine funds for private school Title I programming.)

Project - The set of activities and services described in the Title I Plan, that have been designed to help disadvantaged children residing in eligible attendance areas meet high standards.

Project Designs:

• Extended Day project provides supplemental instructional services to participating children before or after the regular school day.
• Extended Year and/or Summer school project provides supplemental instructional services to participating children before or after the regular school year.
• In-class project provides supplemental instructional services to participating children within the classroom setting.
• Pull-out project provides supplemental instructional services in a setting different from the regular classroom.
• Schoolwide program may be implemented after a year of planning is complete in a school where at least 40 percent of the children are from low-income families. Schoolwide programs are designed to improve the instructional program for the entire school. Contact SEA Title I office for more information.

School – an attendance center within a local education agency.

Schoolwide Program – Not required to specifically identify eligible students, this program model addresses the needs of low-achieving children and those most at risk of not meeting the state student academic achievement standards by integrating Title I services into the regular school program. The focus is on raising building level achievement.

Targeted Assistance Programs – A program that targets services on specific, identified children. A student is eligible for services if he/she is failing, or most at risk of failing, to meet the state’s challenging student academic standards.

Title I Schools in Need of Assistance (SINA) – Each year LEAs provide information about the progress of students in all schools. Title I school buildings that do not make adequate yearly progress are designated as schools in need of assistance. The 2001 re-authorization of Title I requires schools with this identification to notify their public of this identification and, if the district has multiple buildings at the identified grade level, the district must provide transportation for students who wish to transfer to another building in the district. Additional details about transportation requirements are available through the State Title I office.

Supplement vs. Supplant – The local education agency has a responsibility to provide instructional services to all students. Title I funds are designed to supplement not supplant those services. Ask the question, “In the absence of Title I, what educational opportunities would this child receive?” Title I services should be in addition to those local services.

Unduplicated Student Count - each student should be counted only once even if that student receives Title I service in more than one subject area. For example, Tommy receives Title I reading and Title I math services. When computing the unduplicated student count, Tommy can only be counted as one child.
**ELIGIBLE SCHOOL ATTENDANCE AREAS**

Attendance Area - The geographical area or areas in which children attending a specific public school reside.

Schoolwide - Schoolwide programs allow buildings with a poverty level of 40 percent or more to combine funds to upgrade a school’s overall educational program. This increased flexibility eliminates the requirement that specific children be identified for Title I instruction. It allows schools to combine local, state and select federal funds to implement a program helping all children meet academic standards.

Targeted Assistance School - A Title I school whose low-income percentage is at or above the district average, but not participating as a schoolwide program.

Local Education Agency (LEA) - A term synonymous with the typical Iowa school district.

State Educational Agency (SEA) - The Iowa Department of Education.

**DEFINING SCIENTIFIC RESEARCH**

Following is the definition of “scientifically based research” as it appears in the *No Child Left Behind Act of 2001*.

“The term 'scientifically based research' (A) means research that involves the application of rigorous, systematic, and objective procedures to obtain reliable and valid knowledge relevant to education activities and programs; and (B) includes research that:

- Employs systematic, empirical methods that draw on observation or experiment;
- Involves rigorous data analyses that are adequate to test the stated hypotheses and justify the general conclusions drawn;
- Relies on measurements or observational methods that provide reliable and valid data across evaluators and observers, across multiple measurements and observations, and across studies by the same or different investigators;
- Is evaluated using experimental or quasi-experimental designs in which individuals, entities, programs, or activities are assigned to different conditions and with appropriate controls to evaluate the effects of the condition of interest, with a preference for random-assignment experiments, or other designs to the extent that those designs contain within-condition or across-condition controls;
- Ensures that experimental studies are presented in sufficient detail and clarity to allow for replication, or at a minimum, offer the opportunity to build systematically on their findings; and
- Has been accepted by a peer-reviewed journal or approved by a panel of independent experts through a comparably rigorous objective, and scientific review.”

All Title I reading programs must implement “scientifically based reading research” programs with a focus on phonics, phonemic awareness, vocabulary, fluency, and comprehension.

**DEFINITION OF APPLICATION BUTTONS**

Open Menu

The *Open Menu* button expands the “Title I” heading to display the forms that must be completed before the Title I application will be approved.

Close Menu

The *Close Menu* button will collapse the listing of Title I forms.

Add New Contacts

The *Add New Contacts* button will bring up a form to be completed when the district wants to add a new contact to the list of program contacts.

Save
The **Save** button saves the information entered. The **Save** button allows the user to stop working and return at another time.

[Finish]

The user will click the **Finish** button **ONCE** after entering data into a form before moving forward to another form. The **Finish** button will initiate validation edits on the form, which may result in necessary corrections before the user will be allowed to move on to another form. The **Finish** button also saves data and updates the status of the current form.

Once the Title I application is State approved, the **Finish** button will appear again. The user must click on this button to declare final expenditures with the Iowa Department of Education and receive the final payment on the approved budget. You are reminded that the **Finish** button should not be selected until the user is certain all project budget expenditures are final and accurately listed in the project budget being certified as complete. Before finalizing, please check with the district business manager to be certain that the budget does not need to be amended.

[Close]

The **Close** button allows the user to close the current open form and return to the Title I Home menu.

[District not Updated]

The **District not Updated** button gives the current status of the application. The status “District not Updated” means the local education agency needs to complete the required data on the current form. The status will change once the user completes the form and clicks the **Finish** button.

[District Updated]

The **District Updated** button gives the current status of the application. The status “District Updated” means the user has completed the required data on the current form, met all validation edits and clicked the **Finish** button.

[Comments]

The **Comments** button moves the user to the comments screen. Any comments entered will be able to be viewed from this screen.

[District Finished]

The **District Finished** button gives the current status of the application. The status “District Finished” means the district has completed the required data for the form and met all validation edits. The user may move on to the next form to be completed.

[Undo]

The **Undo** button, which appears after the application is “District Updated,” replaces the **Finish** button and allows the user to make revisions to the application prior to clicking the **Submit** button to start the process of Title I
consultant approval. Depending on the reason for making a change to the form, it might be advisable to visit with the Title I office prior to using the *Undo* option.

The *Expand All* button allows the user to see all budget data.

The *Collapse All* button allows the user to only see budget summary data. The user may collapse only one or two rows by clicking at the left side of the budget row.

The *Add Amendment* button appears after the Title I budget has been approved by the SEA and allows the local education agency the option of revising general budget items during the project year. If you did not spend the entire approved budget and plan to use the unspent funds as carryover, you must amend the general budget. The user will be able to access and complete an amendment simply by clicking the *Add Amendment* button.

The *Within District Targeting Funds Worksheet* button allows a user who must complete the Within District Targeting of Funds form to download a copy of the related instructions and worksheets from the Iowa Department of Education web site by clicking the *Within District Targeting Funds Worksheet* button.

The *Schoolwide Plan Template* button allows a user who must complete one or more Schoolwide plans, to attach to the Title I application, to access and download the requirements of the Schoolwide plan from the Iowa Department of Education web site.

The *Upload Parent Policy* button gives the user access to browse their computer files and upload the district Parent Involvement Policy to the Title I application.

The *Upload Compact* button gives the user access to browse their computer files and upload the district Parent-Student-Teacher Compact to the Title I application.

The *View* button allows the user to see the document that has been uploaded to the application and make a change if necessary.
The Re-upload button allows the user to delete a document that has been uploaded to the application and upload the proper one.

Pick One

The Pick One button on the Statement of Agreement form will allow the user to select the location of Title I service to be provided to a private school.

Waiting on Private School

The Waiting on Private School button on the Statement of Agreement form informs the user that the private school official has been notified by automatic email that they may review and affirm the Private Title I Agreement. This affirmation is required before the LEA will be able to certify the application.

Add New Equipment

The Add New Equipment button on the Title I Equipment Inventory form allows the user to enter required data regarding equipment purchased with Title I funds.

Submit

The Submit button appears once every required form has been completed by the user and the District is Finished button is on the status screen. The user should click the Submit button to notify the Title I consultant that the State approval process may begin.

Print Summary

The Print Summary button appears on the Project Narrative form to format and print the narratives.

Add New Area

The Add New Area button, on the Migrant Education Application, allows the user to enter the required city and county data for a Title I migrant education program.

**TITLE I INTERNET APPLICATION FAQS**

Q. **How do I access the Title I Internet application for my LEA?**
   A. The web address for the Title I Internet application is [https://portal.ed.iowa.gov](https://portal.ed.iowa.gov). The Iowa Department of Education Iowa Education Portal site will appear. On the blue navigation menu bar, highlight “A&A Account” and click on “Sign In.” On the “Sign In” tab, enter your Account ID (email address) and password to sign into DOE – Education Portal. Click the “Sign In” button.

Q. **How do I submit the application?**
   A. To submit application data for review and approval by Title I staff, complete each form applicable to your LEA (at minimum, six forms must be completed), click Finish to save data on each form, review and correct as necessary any edit checks. The Status screen will indicate “District Updated” as each form is finished. When the status for each form in a program indicates “District Updated,” a Submit button will appear. Once the user clicks the Submit button it signifies to the State Title I office that the LEA has completed the application and is submitting it for approval.
Q. **How do I know my application was received by the State Title I office?**

A. The Title I office automatically receives a message when an application is submitted. Once your application is approved by a Title I consultant and the Title I Administrative Consultant, the district Title I contact will receive an email to that effect that will indicate the next process for the district will be to review the budget for the necessity of a budget amendment prior to finalizing the project and generating the final payment. The Payment Status form will give the approved amount once the SEA has approved the application.

Q. **How do I close out a Title I program?**

A. The method to close a Title I program is an electronic process to signify that all approved expenditures on the Title I program budget have been made. Following State approval of the Title I application, a **Finish** button will appear at the top of the budget table on the appropriate budget form. This button is used to certify the project for final payment. Prior to clicking the **Finish** button, the user should review the approved budget to compare actual expenditures and the expenditures within each category for accuracy. There is a 10 percent line item variance provided the actual expenditures are not less than the approved amount. If the approved project budget does not accurately reflect actual expenditures within 10 percent, an electronic amendment process must be completed prior to the project budget completion final certification. When the approved budget accurately reflects actual expenditures, click the **Finish** button. The LEA should follow this final certification process for all approved Title I programs. All Title I budgets should have the final certification process complete no later than August 15 of each year.

Q. **How do I amend my Title I budget?**

A. To amend a Title I project budget, click the **Add Amendment** button that appears toward the top of the appropriate budget form. Enter the figures to reflect the new budget, but do not change any figure from the original budget that is to remain the same. The amended budget should reflect the total expenses to be reimbursed by Title I. Do not enter any figure into a “total” box. Click **Finish** to save the new budget; click **Submit Title I** to submit the amendment for approval by Title I staff. Refer to the step-by-step instructions on the amendment process for additional guidance.

Q. **How do I complete the form to show the within district targeting of funds?**

A. If the LEA has 1,000 or more students, provides Title I service at a private school, or has a building designated as SINA the user should click on the Within District Targeting of Funds form. Review worksheets and guidance in this document and select Method 1 or 2. Enter your allocation, any carryover funds and compute set-asides. Verify the pre-populated data automatically entered from the Selection of Schools form and complete the Per Poverty Child Amount column with the district-calculated per-poverty allocation. Once the **Finish** button is clicked, the attendance area allocation will automatically be calculated. **TOP 10 TITLE I TIPS**

**In the Application Process:**
- Never enter data in “Total” space on Budget form.
- Be sure to complete all narratives (including local neglected/delinquent as applicable) in order to be able to submit the application and receive funding.
- You may expand the budget to see the detail or collapse it to see summary data.
- Don’t forget to add private school students into appropriate public attendance center on Selection of Schools form.
- Enter grades SERVED for targeted assistance and schoolwide buildings on Selection of Schools form.
- Complete the staff and paraprofessional data on Staff Assignments form.
- Complete Schoolwide Indication of Planning form if in planning year for schoolwide program.
- Complete Schoolwide Operating Programs form if Title I service is provided in schoolwide program buildings within the district and upload a Schoolwide Plan for each SWP building.
- Any district serving private school students or having a SINA school must complete the Within District Targeting of Funds form using the updated formula calculations and Title I Reference Manual worksheet.
- Remember that you must amend previous year general budget before funds approved, but unspent, are available for carryover.

**In the Final Certification Process:**
- Remember that once the budget is certified as final, no changes can be made without an amendment process.
- Do not certify as final before all expenditures are complete, even if expenses run over into another fiscal year.
- Be aware that you may certify as final if the only expenditures left to pay are fixed (e.g. salaries and/or benefits).
- Compare actual expenditures to approved budget to ensure accuracy before certifying final expenditures.
- Amend budget to correct discrepancies BEFORE clicking the **Finish** button.
Remember you must amend before funds approved, but unspent, are available as carryover for the following school year.

Remember that certifying the project as final can only be done electronically by accessing the appropriate Title I budget.

Certify the project as final by clicking on the Finish button that appears at the top of the budget table no later than August 15.

Remember that each budget must be certified as final separately.

If a budget is amended at the end of the project, the district must wait for SEA approval before certifying the project as final.

In the Amendment Process:

- Anticipate changes in the project budget that would necessitate an amendment.
- Amend as necessary but try to limit multiple amendments to the same program.
- Any amendment must be done electronically by the district.
- Always print a paper copy of the approved budget for your files.
- Access an amendment by clicking the Add Amendment button at the top of the appropriate budget form.
- The figures that remain the same as they appeared on the original budget must also be part of the amended budget to reflect all costs to be approved and paid from a particular budget.
- You must click the Finish button to save the amendment.
- Don’t forget to certify the amended budget by clicking the Certify button now appearing on the budget summary table.
- If a budget is amended at the end of the project, the district must wait for SEA approval before certifying the project as final.
- Remember you must amend before funds approved, but unspent, are available as carryover for the following school year.

**TITLE I APPLICATION CHECKLIST FOR 2014-2015**

**Note:** The Title I Internet application is required for approval of Title I 2014-2015 school year funding and must include completion of required elements as applicable. Access application at [https://portal.ed.iowa.gov](https://portal.ed.iowa.gov).

- **PARENT INVOLVEMENT POLICY AND COMPACT** has been reviewed and updated for the 2014-2015 school year and downloaded.

- **ANNUAL TITLE I APPLICATION**
  WHAT? Selection of Schools, Project Narratives, Project Staff Assignments, Homeless Education, General Budget forms.
  General Carryover Budget form, if carryover funding is available.
  WHY? Required to receive Title I funding for the 2014-2015 school year.
  WHO? All LEAs with 2014-2015 Title I program.
  WHEN? Due by electronic submission September 15, 2014.

- **WITHIN DISTRICT TARGETING OF FUNDS**
  WHAT? Report of school attendance area allocations based on number of children from low-income families.
  WHY? Required to receive Title I funding for the 2014-2015 school year.
  WHO? All LEAs with 1,000 or more students, any LEA providing Title I service to a private school or if any building is designated as a SINA building.
  WHEN? Due by electronic submission September 15, 2014.

- **STATEMENT OF AGREEMENT**
  WHAT? Declaration of contact with accredited private school representatives for the purpose of offering Title I services.
  WHY? Required to receive Title I funding for the 2014-2015 school year.
  WHO? All LEAs with eligible private schools within their boundaries, even if not providing service to private school.
  WHEN? Due by electronic submission September 15, 2014.

- **LOCAL NEGLECTED APPLICATION**
  WHAT? All applicable Annual Title I Application forms plus the Local Neglected Narrative form and assurances.
  WHY? Required to receive Title I local neglected funding for the 2014-2015 school year.
  WHO? All LEAs with 2014-2015 Title I program to serve children in local neglected institution.
  WHEN? Due by electronic submission September 15, 2014.
**LOCAL DELINQUENT APPLICATION**

**WHAT?** Delinquent Application, Project Staff Assignments, Delinquent Budget, Local Delinquen Narrative forms and assurances.

**WHY?** Required to receive Title I local delinquent funding for the 2014-2015 year.

**WHO?** All LEAs with 2014-2015 Title I program to serve children in local delinquent institution..

**WHEN?** Due by electronic submission September 15, 2014.

**MIGRANT EDUCATION APPLICATION**

**WHAT?** Migrant Education Application, Project Staff Assignments, Migrant Budget, forms.

**WHY?** Required to receive Title I migrant education funding for the 2014-2015 school year.

**WHO?** All LEAs with 2014-2015 Title I program to serve children of migratory workers.

**WHEN?** Due by electronic submission September 15, 2014.

**SCHOOLWIDE PROGRAM APPLICATION**

**WHAT?** Schoolwide Operating Programs form and Schoolwide Indication of Planning form, as applicable. LEAs must also upload a written schoolwide plan for each schoolwide program building.

**WHY?** Required to implement a schoolwide program with Title I funding for the 2014-2015 school year.

**WHO?** Only LEAs with approved schoolwide program or with a school in a planning year prior to implementing SWP.

**WHEN?** Due by electronic submission September 15, 2014.

**SINA PLAN**

**WHAT?** School Improvement Application for Schools in Need of Assistance, SINA Assurances, SINA Budget.

**WHY?** Required to comply with NCLB sanctions for Title I Schools in Need of Assistance for the 2014-2015 school year.

**WHO?** SINA schools that receive Title I funds are required to comply with NCLB sanctions, which include writing an action plan, offering school choice, etc.

**WHEN?** Due by electronic submission within the Title I application and C-Plan by November 1, 2014.

**TITLE I EQUIPMENT INVENTORY AND DISPOSAL RECORD** Due by electronic submission September 15, 2014

Title I Office
Iowa Department of Education
Grimes State Office Building
400 E 14th Street
Des Moines IA  50319
Phone: (515) 281-5313
FAX: (515) 242-5988
Web site: [http://educateiowa.gov](http://educateiowa.gov)

The user must begin the Title I application process by completing the** Contacts** form on the Iowa Education Portal at [https://portal.ed.iowa.gov](https://portal.ed.iowa.gov).
Iowa Department of Education

**CONTACTS SCREEN**

*Note: The Contacts screen must be completed in order to proceed with the application process.*

For technical assistance on entering contact information, contact the Title I consultant for your particular AEA.

The Contacts screen is where the Title I coordinator will enter contact information in the available areas. The contact person is the individual who will be contacted about information given in this application.

### Contacts

+ [Add New Contact]

#### Title I

**No Contacts**

**Homeless Education Liaison**

**No Contacts**

The user will see a listing of the Title I application programs that pertain to their local education agency and may see information listed for the last Title I contact of record. The user will have the option to click the **Delete** button if the contact information is incorrect or the **Edit** button to update the contact information or leave it as listed. Please verify the contact person’s e-mail address, name, mailing address, office telephone number, and title.

### Title I

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Email</th>
<th>Phone</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joe</td>
<td>Smith</td>
<td><a href="mailto:jsmith@school.k12.ia.us">jsmith@school.k12.ia.us</a></td>
<td>123/456-7890 Ext. 987</td>
<td>Superintendent</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Email</th>
<th>Phone</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>John</td>
<td>Doe</td>
<td><a href="mailto:jdoe@school.k12.ia.us">jdoe@school.k12.ia.us</a></td>
<td>123/456-7890 Ext. 345</td>
<td>Counselor</td>
</tr>
</tbody>
</table>

**Homeless Education Liaison**

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Email</th>
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<tbody>
<tr>
<td>John</td>
<td>Doe</td>
<td><a href="mailto:jdoe@school.k12.ia.us">jdoe@school.k12.ia.us</a></td>
<td>123/456-7890 Ext. 345</td>
<td>Counselor</td>
</tr>
</tbody>
</table>

*Note: The superintendent may not act as the contact for Homeless Education as that may result in a conflict of interest in certain situations.*

If no contact information is listed, the user may click the **Add New Contact** button under the Contacts heading and the following screen will appear. Check all program areas as they apply.
to the contact entered. If the same person is responsible for each of the designated program areas, check “Select All” and the same contact information will appear for each program area.

Once the user clicks the **Save** button, the district contact information will display for each program.

**Title I**

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Email</th>
<th>Phone</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jane</td>
<td>Doe</td>
<td><a href="mailto:jdoe@school.k12.ia.us">jdoe@school.k12.ia.us</a></td>
<td>123/456-7890 Ext. 987</td>
<td>Superintendent</td>
</tr>
</tbody>
</table>

**Homeless Education Liaison**

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Email</th>
<th>Phone</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>John</td>
<td>Doe</td>
<td><a href="mailto:jdoe2@school.k12.ia.us">jdoe2@school.k12.ia.us</a></td>
<td>123/456-7890 Ext. 945</td>
<td>Counselor</td>
</tr>
</tbody>
</table>
### Delinquent

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>Email</th>
<th>Phone</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jane</td>
<td>Doe</td>
<td><a href="mailto:jdoe@school.k12.ia.us">jdoe@school.k12.ia.us</a></td>
<td>123/456-7890 Ex. 987</td>
<td>Superintendent</td>
</tr>
</tbody>
</table>

The user will have the option to delete an entry or to edit as necessary.

Return to the main application screen by clicking on the **Open Menu** button at the top right of the screen to begin the application process.
Note: The following assurances must be agreed to and certified by the official local education agency representative before the Title I application can be approved and funding received for the current school year.

The applicant for Title I funds pursuant to P.L. 103-382 applies for a grant to help disadvantaged children meet high standards and therefore assures the Director of the Iowa Department of Education that:

A. The control of funds provided to the LEA under each program and title to the property acquired with those funds will be in a public agency and that a public agency will administer those funds and property.

B. The LEA/agency will use fiscal control and fund accounting procedures that will ensure proper disbursement of, and accounting for, Federal funds paid to that agency under each program.

C. The LEA/agency will cooperate in program evaluations conducted by or for the State Agency or United States Department of Education.

D. The LEA/agency will make reports to the State Agency, in such form and containing such information, to enable the State Agency to perform its duties.

E. The LEA/agency will provide opportunities for public comment on the Title I plan and consideration of such comment will be afforded.

F. The LEA/agency will have on file service delivery plans for each Title I funded attendance center.

G. The LEA/agency will maintain records that are updated biennially documenting compliance with comparability requirements.

H. The LEA/agency will consult with appropriate private school officials during the design and development of Title I programs.

I. The LEA/agency will implement programs, activities, and procedures for the involvement of parents in accordance with Section 1118 [Parental Involvement] including, but not limited to, the development of a written parental involvement policy and school-parent compact, convening an annual meeting, and establishing mechanisms that build parental capacity for involvement.

J. To the extent feasible, the LEA/agency will coordinate and integrate Title I service with other agencies providing services to children, youth, and families (including health and social services) to the extent feasible and necessary.

K. The LEA agrees that it will comply with Title VI of the Civil Rights Act of 1964, Title IX of the Educational Amendment of 1972, the Vocational Rehabilitation Act of 1973, and all the requirements imposed by or pursuant to legislation which require non-discrimination in employment and programs on the basis of race, national origin, gender, or disability.

L. Auditing of this project will be in accordance with OMB Circular A-133 requirements.

M. The independent auditor, federal agency, comptroller general, and/or the pass-through entity (SEA) shall have access to records and financial statements as may be necessary to comply with monitoring requirements.
N. Funds granted by Title I will be used to supplement and not supplant state and local funds expended for educational services.

O. The LEA/agency will inform eligible schools and parents of schoolwide project authority, if applicable.

P. The LEA/agency will provide technical assistance and support to schoolwide programs, if applicable.

Q. The LEA/agency will work in consultation with schools as they develop the schools’ plans pursuant to Section 1114 [Schoolwide Programs] and assist schools as they implement such plans or undertake activities pursuant to Section 1115 [Targeted Assistance Schools] so that each school can make adequate yearly progress toward meeting content and performance standards.

R. The LEA/agency will allocate Title I funds to eligible school attendance areas on the basis of the total number of children from low-income families in each area or school in accordance to Section 1113(c).

I HEREBY CERTIFY that I have read the above assurances and to the best of my knowledge, the information contained in this plan is correct, the agency has authorized me as its representative to file this plan/application; and current approval of this plan/application is recorded in the minutes of the agency’s Board meeting.

I, the authorized agent, assure the Iowa Department of Education, that the Title I assurances shall be implemented and complied with as stated. I ALSO UNDERSTAND THAT THE APPROVAL OF THIS PLAN/APPLICATION DOES NOT RELIEVE THE LOCAL EDUCATIONAL AGENCY OF ITS RESPONSIBILITY TO COMPLY WITH ALL APPLICABLE REQUIREMENTS.

The local education agency authorized representative must click the certification statement, as shown above, on the Title I Assurances screen as the first step in the Title I application process. Click the Finish button to return to the Title I Home screen.

The Title I application will be completed by program type (e.g. Title I, Delinquent, Migrant, and SINA) and each screen requiring completion will be considered a form within the program. All forms must be completed by the district before the program application can be saved, finished and submitted to the State Title I office for processing. The recommended order for completing the forms within the Title I program is as follows:

**Title I**

Contact Information
Title I Assurances
Selection of Schools
General Budget
Carryover Budget
Homeless Education
Staff Assignments
Within District Targeting of Funds
Title I Narratives for Targeted Assistance
Schoolwide Operating Programs
Upload Schoolwide Plan for each Schoolwide Program building
Upload Parent Policy and Student Compact
Private School Statement of Agreement
Title I Equipment Inventory
Neglected Narratives
Neglected Facility
Schoolwide Indication of Planning for a building in a planning year to become a Schoolwide program
Payments
Each form will show a status update so district and State staff will be informed of the completion of the application process at all times. Once a form is completed by the district, the status will be “District Finished” and that form will be sent to the bottom of the status list.

<table>
<thead>
<tr>
<th>Form Name</th>
<th>Status</th>
<th>Updated By</th>
<th>Updated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title I Assurances</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Selection of Schools</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>General Budget</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Homelessness Education</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Staff Assignments</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Within District Targeting of Funds</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Title I Narrative for Targeted Assistance</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Schoolwide Operating Programs</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Upload parent policy and compact</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Dubuque Lutheran School Statement of Agreement</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Holy Ghost School Statement of Agreement</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Mazzuchelli Catholic Middle School Statement ...</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Resurrection School Statement of Agreement</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>St Anthony School Statement of Agreement</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>St Columbkille School Statement of Agreement</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>St Joseph The Worker School Statement of Agreement</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Wahlert Catholic High School Statement of Agreement</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Title I Equipment inventory</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
<tr>
<td>Neglected Narratives</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
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<tr>
<td>Neglected Facility</td>
<td>District not Updated</td>
<td>Admin</td>
<td>6/8/2014</td>
</tr>
</tbody>
</table>

Click Title I and select the Selection of Schools form to be completed first.
Selection of Schools

Note: The Selection of Schools form must be completed in order to receive Title I funding.

For technical assistance on the Selection of Schools form, contact the Title I consultant for your particular AEA.

The data contained in the Selection of Schools form is used to determine Schools In Need of Assistance (SINA) that will be eligible to receive SINA funding and also to determine low-income buildings for the purpose of the teacher loan cancellation program. Therefore, the Selection of Schools form should annually be completed no later than September 15.

Note: Any changes made to the Selection of Schools form after September 15 with respect to Schools In Need of Assistance (SINA) receiving Title I service will not guarantee that building will receive a SINA allocation.

When completing this form, “Low-Income Criteria,” “Resident Children,” and “Rank Order” must all be completed. Choose the low-income criteria your LEA will use to determine low-income building percentage. Then determine how you will report the low-income percentages for buildings by total low-income percentage or by grade span. The most common data used for these categories is “Free and Reduced School Lunch,” “Attendance Area,” and “Low-Income Percentage.” Note: Data used in this section may be from any month during the previous school calendar year, but must be consistent across the school district.

An LEA must rank all of its school attendance areas (the geographic area from which the school district draws its children) according to their percent of poverty. An LEA must use the same measure of poverty for identifying eligible school attendance area; determining the ranking of each area; and determining the allocation for each area.
LOW-INCOME CRITERIA

Select the source or sources of data that the agency uses to determine the number of low-income families. An LEA must select a poverty measure from the following options: children ages 5-17 in poverty as counted in the most recent census data; children eligible for free and reduced-price lunches; children in families receiving assistance under the State Temporary Assistance for Needy Families (TANF); children eligible to receive medical assistance under the Medicaid program; or a composite of any of the above measures. Each LEA must choose a single data source or combination of data sources as its school attendance area selection criterion. Documentation of data secured should be made part of the applicant agency’s Title I record, but need not be submitted to the State Title I office. However, the LEA should keep this information on file for possible inspection by auditors and the SEA staff. The most commonly used source of low-income data is the school district free and reduced price school lunch count.

RESIDENT CHILDREN

Please select either “Attendance Area” or “Enrolled” to indicate which most accurately reflects the data shown in the attendance table for “Resident Children by Attendance Area” and “Resident Children from Low-Income Families.” If school attendance centers within a school district have no official boundaries, the LEA may determine school attendance center low-income percentages using enrollment figures.

RANK ORDER OF ATTENDANCE AREAS

Please indicate whether the LEA is using low-income percentage or grade span and percentage to rank order attendance centers. Based on the choice selected, the attendance centers will be automatically sorted once all data is entered in the table and user clicks the Finish button. The most commonly used method is rank order by low-income percentage.

ATTENDANCE CENTER INFORMATION

Note: Data used in this section may be from any month during the previous school calendar year, but must be consistent across the district. Do not use official enrollment count data for this section.

The attendance center table should display all of the public attendance centers within the LEA. Note: If a building is listed that has been closed within your school district or there is a new building in your LEA since the last school year that is not listed, please contact the Title I office for assistance in correcting the listing of attendance centers for your district. Each year, each building must analyze its own student achievement data and make appropriate decisions about Title I services. Title I services should be based upon current conditions, not past traditions. However, Title I services must operate within the boundaries of Title I legislation. Funding is based on compliance with legislation. In determining Title I service for the upcoming school year, ask questions such as: Are we offering reading services and/or math services? Why?; What grade levels will be served? Why?; What will qualify a student for Title I services? Determine the Title I service status for each of the buildings listed and then complete all applicable columns. When entering data on the Selection of Schools form, it is best to tab through the columns to avoid errors in the automatic calculations. The user will need to complete the table for each attendance center including the status (select S, T or N), number of resident children, and number of resident children from low-income families. Schoolwide project buildings (Status = S) must have poverty above 40% and must have completed a year of planning and have been approved by the State Title I office. All other served buildings are considered targeted assistance (Status = T). A building not receiving Title I service should show status “N” for not served. Each building must have data for each public and private column. If a building is identified as providing targeted assistance service (Status = T), the number of students identified as eligible and the number served must be completed. For a schoolwide building (Status = S) do not complete eligible and served columns. The last column showing the grade levels served by Title I must be completed for all served buildings whether status is S or T.
Targeted Assistance Programs

- Only eligible students are served in only Title I eligible buildings
- 407 Targeted Assistance Program buildings in 2013-2014

Schoolwide Programs

- All students in the building are considered Title I students
- 194 Schoolwide Program buildings in 2013-2014
- Written criteria for entering and exiting the program
  - PreK – 2
  - Grades 3 and up
  - Clear performance standards
  - Available and provided to parents

- Grouping Practices
  - Pull-out
  - In-class
  - Combination of pull-out and in-class

- All students in the building are considered Title I students
- The Schoolwide Program requires a year of planning
- During planning year, a future Schoolwide Program building must operate as a Targeted Assistance Program building

<table>
<thead>
<tr>
<th>Written criteria for entering and exiting the program</th>
<th>Grouping Practices</th>
</tr>
</thead>
<tbody>
<tr>
<td>PreK – 2</td>
<td>Pull-out</td>
</tr>
<tr>
<td>Grades 3 and up</td>
<td>In-class</td>
</tr>
<tr>
<td>Clear performance standards</td>
<td>Combination of pull-out and in-class</td>
</tr>
<tr>
<td>Available and provided to parents</td>
<td></td>
</tr>
</tbody>
</table>

- Title I teacher responsibilities:
  - Working with identified students
  - Parent communication
  - Coordinating with classroom teachers
  - Students records
  - Operate according to Title I regulations for the percentage of the day paid with Title I funds
  - Maintain time sheet or work log to document federal funding stream pay
  - Title I reading teachers must maintain a reading endorsement
  - No additional endorsement is required for Title I math teachers

- The SchoolWide Plan intended to improve the achievement of ALL students
- The Schoolwide Plan identifies services to be provided
- Districts with more than one Schoolwide Program must submit a Schoolwide Plan for each building
- The Schoolwide Plan must be specific to each building
- The Schoolwide Plan must be reviewed and revised each year
- The Schoolwide Plan must address homeless students
- Each schoolwide building must have its own Schoolwide Program Planning and Evaluation team
- New or revised Schoolwide Plans must be submitted to the State Title I office by September 15

- All students in the building are considered Title I students
- The Schoolwide Program requires a year of planning
- During planning year, a future Schoolwide Program building must operate as a Targeted Assistance Program building

<table>
<thead>
<tr>
<th>Title I teacher responsibilities:</th>
<th>Title I Para-educators:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Working with identified students</td>
<td>Work under direct supervision of a Title I teacher</td>
</tr>
<tr>
<td>Parent communication</td>
<td>Be “highly qualified” regardless of funding stream</td>
</tr>
<tr>
<td>Coordinating with classroom teachers</td>
<td></td>
</tr>
<tr>
<td>Students records</td>
<td></td>
</tr>
<tr>
<td>Operate according to Title I regulations for the percentage of the day paid with Title I funds</td>
<td></td>
</tr>
<tr>
<td>Maintain time sheet or work log to document federal funding stream pay</td>
<td></td>
</tr>
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<td></td>
</tr>
<tr>
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- New or revised Schoolwide Plans must be submitted to the State Title I office by September 15

All Title I reading programs must implement "scientifically based reading research" programs. Programs must have the 5 areas of focus: phonics, phonemic awareness, vocabulary, fluency, comprehension.

**Note:** Title I services must operate within the boundaries of Title I legislation. The disbursement of Title I funding is based upon compliance with legislation.

In determining district buildings to provide Title I service, keep these rules in mind:

- All schools with 75% or above poverty must be served or document other funding sources
- Schools at or above 35% poverty may be served
- Schools at or above the district wide poverty percentage may be served.

**Column 5 - Public - All Resident Children by Attendance Area**

Enter, by attendance center, the number of children residing therein. This would include all resident children enrolled in other public schools, children housed in institutions in the LEA, children that are home-schooled, and dropouts. The column will automatically calculate the total number of resident public school children in the LEA.

**GRADESHERING DISTRICTS** need to enter the combined resident count for grade levels housed within district.

**Note:** Where applicable include special education children (i.e. special education students the LEA sends to programs in other LEAs, local neglected and delinquent children, children that are home-schooled, and dropouts that could be enrolled in the grade levels housed from both the LEA filing the application and LEAs entered in the whole-grade sharing agreement.

**Column 6 - Private - All Resident Children by Attendance Area**

Enter the number of children attending private schools that reside within each public school attendance center boundary. The column will automatically calculate the total number of resident private school children. **Note:** Accredited private schools within the LEA appear at the bottom of this form. If there are private schools within your LEA, you must reflect the appropriate numbers in this column.

Title I continues the requirement that an LEA provide equitable services to eligible children enrolled in private schools. **Section 1113[c] of Title I** requires an LEA to allocate funds to a participating school attendance area or school on the basis of the total number of children from low-income families, including low-income children attending private schools.
Thus, the LEA, in consultation with private school officials, must obtain the best available poverty data on private school children who reside in participating attendance areas. Because private school officials may have access to some sources of poverty information not easily accessible to public school officials, it is very important that public and private school officials cooperate in this effort. An LEA may count private school children from low-income families every year or every two years.

In collecting poverty data on private school children, the Title I statute gives an LEA flexibility to calculate the number of children who are from low-income families and attend private school. To obtain a count of private school children, an LEA may use:

1. The same poverty data it uses to count public school children.
2. Comparable poverty data from a survey of families of private school students that, to the extent possible, protects the families’ identity. The LEA may extrapolate data from the survey based on a representative sample if complete actual data are not available.
3. Comparable data from a different source, such as scholarship applications so long as the income level for both sources is generally the same.
4. Proportional data based on the poverty percentage of each public school attendance area applied to the total number of private school children who reside in that area.
5. An equated measure of low income correlated with a measure of low income used to count public school children.

For further guidance in determining low-income private school children, see Title I Questions and Answers, Allocation of Title I Funds to School Attendance Areas and Schools section of this reference manual.

**Column 7 - Total - All Resident Children by Attendance Area**
Columns 5 and 6 will be automatically calculated to reflect the total number of resident children by attendance center. Column 7 will automatically calculate to reflect the total number of resident children in the LEA.

**Column 8 - Public - Resident Children from Low-income Families**
Enter, by attendance center area, the number of children from Column 5 that are from low-income families. The column will automatically calculate the total number of resident public school children from low-income families within the LEA.

**Column 9 - Private - Resident Children from Low-income Families**
Enter, by attendance center area, the number of children from Column 6 that are from low-income families. The column will automatically calculate the total number of resident private school children from low-income families. **Note:** Accredited private schools within the LEA appear at the bottom of this form. If there are private schools within your LEA, you must reflect the appropriate numbers in this column.

**Column 10 - Total - Resident Children from Low-income Families**
Columns 8 and 9 will be automatically calculated to reflect the total number of children that are from low-income families by attendance center area. Column 10 will automatically calculate to reflect the total number of public and private school students that are from low-income families.

**Column 11 - Percent - 10/7**
The low-income percentage for each attendance center area will be automatically computed to reflect the percent of low-income in Column 11 to the nearest tenth of a percent (e.g. 29.6). The box at the bottom of Column 11 will automatically enter the districtwide average low-income percentage by dividing the total of Column 10 by the total of Column 7. Those schools above the districtwide average are eligible to receive Title I funds. (Refer to section on Within District Targeting of Title I funds.)

✅ **TIP:** Attendance centers with 75% or above poverty rate are mandatory centers, including middle and high schools, and must be served by Title I.

Only after an LEA has served all of its areas with a poverty rate above 75 percent may the LEA serve lower-ranked areas. The LEA has the option to (1) continue on with the district-wide ranking or (2) rank remaining areas by grade span groupings.

- The same district-wide poverty average must be used if the LEA selects option (1).
- For ranking by grade span groupings, the LEA may use (1) the district-wide poverty average or (2) the district-wide grade span poverty averages for the relevant grade span grouping.
- If an LEA has no school attendance areas above 75 percent poverty, the LEA may rank district-wide or by grade span groupings.
- An LEA’s organization of its schools defines its grade span groupings. For example, if an LEA has elementary schools serving all elementary grades, middle schools, and high schools, the grade span groupings would be grades K-5, 6-8, and 9-12. To the extent an LEA has schools that overlap grade spans (e.g., K-8), the LEA should include a school in the grade span in which it is most appropriate.

**Note:** An LEA with an enrollment of less than 1,000 students or with only one school per grade span is not required to rank its school attendance areas.
Column 12 - Eligible - Unduplicated Student Counts (public only) for Targeted Assistance Schools
A student who is failing or most at risk of failing to meet locally determined educational standards is a student eligible for Title I services. Each LEA must develop a process for determining student eligibility. These determinations may be based upon teacher recommendation with documentation, parental input and developmentally appropriate measures for pre-kindergarten through grade 2. For grades 3 and above, use educationally objective criteria to determine eligible students. Using school district Title I selection criteria, enter the unduplicated number of public school students at each (T) Targeted Assistance School who are eligible for the Title I service being offered at that school. “Unduplicated” means that each student should be counted only once even if that student is eligible to receive Title I service in more than one subject area. For example, Tommy is eligible to receive Title I reading and Title I math services. When computing the unduplicated student count, Tommy can only be counted as one child. This column must be completed in order for the application to be approved.

Column 13 - Served - Unduplicated Student Counts (public only) for Targeted Assistance Schools
Using the information in Column 12 enter the unduplicated number of public school students to be served at each (T) Targeted Assistance School. The number in Column 13 cannot be greater than the number in Column 12. “Unduplicated” means that each student should be counted only once even if that student receives Title I service in more than one subject area. For example, Tommy receives Title I reading and Title I math services. When computing the unduplicated student count, Tommy can only be counted as one child. This column must be completed in order for the application to be approved.

Column 14 - Grade Levels Served by Title I
Enter the grade levels at which students are receiving Title I service in each served building. For example, if Title I instruction is available in reading to students in primary grades only, enter “1-3” in column 14 opposite the name of that school.

PRIVATE SCHOOLS RECEIVING SERVICES
Section 1120 of NCLB and Section 200.63 of the Title I regulations mandate services for children in private schools under Title I of ESEA. In summary, the key provisions of the legislation stipulate that:
1. Any district serving a private school must complete the Selection of Schools, Statement of Agreement, and Within District Targeting Funds forms on the electronic Title I application. The completion of the Within District Targeting Funds form determines the amount of funds available to provide Title I services to eligible students in the private school. NOTE: Districts must use the updated formula calculations for the Within District Targeting Funds form. (See the pink section in this reference manual.)
2. Timely and meaningful consultation between public and private school officials must be held to discuss services to be provided in the private school, private school student eligibility for Title I services, and evaluation of the Title I services provided to the private school. Documentation of the meeting is required (agenda, notes, e-mails). NOTE: In the case of declined services, a signed document or e-mail must be maintained in the Title I file.
3. Private schools are not Title I schools. Title I instructional services in private schools are provided by the LEA to private school children who reside in a participating public school attendance area/s and who are in the greatest educational need of those services. Poverty is not a criterion for receiving Title I services.
4. Title I funds for service in a private school are based on the documented student poverty count in the private school.
5. Title I services in a private school must be equitable to those provided in the public school – as funds described above allow.
6. Instruction must be outside the regular classroom (pull-out program); may include extended learning time before and after school, summer school, family literacy/parent involvement activities or a combination of these services.
7. Services, materials and equipment must be secular, neutral, and supplemental in nature; and must be ordered by and paid for by the LEA.
8. Equipment and supplies purchased for use in a private school must be labeled “Title I”; are the property of the public school through which the Title I dollars flow; and under the direction of the LEA-employed Title I teacher.
9. The LEA is never allowed to pay or remit Title I money directly to the participating private school. The public school district is always the fiscal agent remaining in control of federal funds.
10. Multiple private schools in an LEA may pool funds and provide services as a single entity.
11. Public and private schools in the same LEA do not have to provide services to the same grade span group.
12. Title I services in a private school must operate as Targeted Assistance Programs. Schoolwide Programs in private schools are not allowed under the NCLB law.
13. Title I programs in private schools must be evaluated using a process similar to that of the public school programs.
### Private Schools

<table>
<thead>
<tr>
<th>School ID</th>
<th>Name</th>
<th>Grade Levels</th>
<th>Number of Children Enrolled Residing in Project Areas</th>
<th>Unduplicated Student Counts</th>
<th>Educationally Eligible</th>
<th>Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>8302</td>
<td>Private Grade School</td>
<td>PK-08</td>
<td>303</td>
<td></td>
<td>36</td>
<td>28</td>
</tr>
<tr>
<td>8310</td>
<td>Private High School</td>
<td>09-12</td>
<td>146</td>
<td></td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTALS</strong></td>
<td></td>
<td></td>
<td><strong>449</strong></td>
<td></td>
<td><strong>36</strong></td>
<td><strong>28</strong></td>
</tr>
</tbody>
</table>

All accredited private school attendance centers in your school district and the grade levels of each center will automatically be displayed. You must complete the requested data for private schools receiving Title I service. Enter the number of children enrolled who reside in a participating Title I attendance center (these children must also be entered in the attendance center table). Determine the total number of private school children enrolled who are residing in project areas and enter in the appropriate column.

Private school children eligible to be served are children who reside in a participating public school attendance area and who are failing, or most at risk of failing, to meet student academic achievement standards based on the criteria in Section 1115(b) of the Title I statute. Enter the unduplicated number of children from each private school attendance center that are educationally eligible for the Title I service and, in the last column, the actual unduplicated number of private school children to be served. Each column will automatically calculate the total number of eligible private school students and the total number of those students served by Title I. **Note:** If data is completed under the private school section, then data must also be entered in the appropriate columns for the resident public school area in the attendance center table.

✔ **TIP:** If the LEA is providing Title I service to a private school, the user must complete the Statement of Agreement and Within District Targeting of Funds forms in addition to the other required application forms.

**Note:** Even if the private school declines Title I services, the Statement of Agreement and Within District Targeting of Funds forms MUST be completed.

When all information is complete for the Selection of Schools form and the Finish button is clicked, the program will calculate totals and perform validation edits. If required information is missing, the user must fix all errors appearing in RED. The user must verify the YELLOW warning errors. A yellow highlight is simply a reminder to check your work. The warning errors can be bypassed if the data entered is correct. After all errors are corrected, the user must click the Finish button and will be returned to the Title I Home screen.

✔ **TIP:** Do NOT double-click the Finish button.

*Click General Budget form to be completed next.*
Note: The General Budget form must be completed in order to receive Title I funding; and, as applicable, to receive Title I local neglected funding.

For technical assistance regarding the general budget process, contact the Title I consultant for your particular AEA.

For technical assistance with local neglected education programs, contact the Title I consultant for your particular AEA or Rick Bartosh at richard.bartosh@iowa.gov or 515/281-0368.

All required forms must be completed before the State Title I office will approve the Title I application and release Title I funds for the current school year.

The General Budget form for your district will open and the current school year Title I allocation will be displayed. The General Budget form is designed to provide an itemized account of expenditures to be incurred. Note: The General Budget should not include any carryover funds that may be available to the district as there is a separate Carryover Budget for applying for those funds.

Note: Local neglected education program funds must be itemized in the Title I General Budget form to reflect total LEA local neglected program expenditures.

The General Budget form allows the user to enter the specific breakdown of Title I expenditures claimed on the budget and, if necessary, to provide a description of expenditures. Note: Do not attempt to enter any figures in the “Total” fields as the total is automatically calculated as you enter specific expenditure figures. Round all amounts to the nearest dollar. Be sure the total project budget amount applied for on the Title I General Budget (including any local neglected funds, but not carryover funds) does not exceed the new Title I current allocation as noted at the top of the General Budget form. This budget is to reflect only the portion of the Title I program that will be paid with Title I funds received by your LEA

Any LEA with a Title I School in Need of Assistance (SINA), in Year 1 or 2 of identification, is required to reserve 10% of the SINA building’s allocation for professional development in the area of identification (Reading and/or Math). This reserve can be expended in the following ways and must be reflected in the following categories of the general budget:

1. Instruction/1000/Salaries: This would be in the case of a staff member providing professional development to your staff or staff working beyond the contract.
2. Instruction/1000/Purchased Services/Professional Development: This would be in the case of an outside person providing professional development to your staff.
3. Instructional Staff & Support Services/2200/Purchased Services/In-service or Travel: This would be in the case of sending staff to professional development outside of the district.

The required 10% set-aside for professional development must be spent during the current school year

✔️ TIP: Any expenditure covered by local general fund dollars must NOT be included in this budget.

The General Budget form has as its purpose the providing of detail for each budget expenditure. To assist you with this specific budget development, the following explanation of the Title I Budget will be made by discussing the columns moving left to right across the top of the budget.
**Functions** – Each function number represents a broad series of expenditures used in uniform financial accounting.

**Expenditure Accounts** – These expenditure categories represent the names of expenditure accounts to be used to classify Title I expenditures.

**Objects – Salaries** – The salary amounts include all payments for services rendered that will be paid directly by the LEA from Title I funds.

**Objects – Employee Benefits** – Title I funds may be used to pay Iowa Public Employees Retirement System (IPERS), Federal Insurance Contribution Act (FICA) of salaried Title I employees, and other district benefits. Since the percent of contribution on both the above-mentioned programs may change, proposed expenditures should be based upon the current percent of 7.65% for FICA and 8.93% for IPERS. The user must itemize the employee benefits by the categories identified on the General Budget form – FICA, IPERS, and Insurance (e.g. workers compensation insurance, medical, dental, disability, life insurance, and unemployment).

**Objects – Purchased Services** – Purchased Services includes all payments to be made to other agencies or individuals not on the payroll for specific services performed. The reserve for Supplemental Education Services is included under Instruction, Purchased Services column. **Note:** Equipment repair is considered a purchased services expense.

**Objects – Supplies** – Approvable amounts for materials and supplies for the Title I project are to be entered in the Supplies column. It is suggested that supplies expenditures be no more than 6% of the entire Title I budget. Expenditures for materials and supplies will be limited to the minimum required to implement and continue Title I activities or services. Examples of supplies are consumable materials, computer software, books, manuals, etc. **Expenditures for Title I supplies to be purchased must be itemized by category as identified on the General Budget form.**

**Objects – Property** – Approvable amounts for instructional equipment are to be entered in the Property Column. It is suggested that property expenditures be no more than 4% of the entire Title I budget. Expenditures for instructional equipment will be limited to the minimum required to implement and continue Title I activities or services. Examples of items budgeted in property might be computer hardware or furniture. **Expenditures for Title I property to be purchased must be itemized by category as identified on the General Budget form.**

**Objects – Other Expenses and Other Uses of Funds** – The Other Expenses Column includes other expenditures not classified as Salaries, Employee Benefits, Purchased Services, Supplies or Property. This is the column to use for professional dues and **indirect costs** and the Homeless Services set-aside.

**Objects – Total** – This column includes the sum total of amounts recorded in each of the preceding columns.

✔️ **TIP:** See Function explanations below for proper placement of the costs identified above.
Explanation of the Functions 1000-4000 requires certain detail related to regulations governing Title I expenses. Each expenditure category is explained as follows:

<table>
<thead>
<tr>
<th>Expenditure Accounts</th>
<th>Salaries Accounts</th>
<th>Employee Benefits 200</th>
<th>Purchased Services 300-599</th>
<th>Supplies 600</th>
<th>Property 700</th>
<th>Other Expenses 800</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
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<td>Travel Between</td>
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**Function 1000 – Instruction** – This includes Salaries paid to the employees who have been employed to complete the teaching activities of the Title I program. Title I funds may be used to pay employee benefits under the Iowa Public Employees Retirement System (IPERS) and Federal Insurance Contribution Act (FICA) for salaried Title I teachers and educational associates as these are mandated by law. **Note:** The employer share for IPERS is 8.93%. The 10% reserve may also pay a staff member providing professional development to your staff in a Title I SINA school.

Purchased Services includes amounts for instructional services purchased from other agencies or rental of instructional equipment. It also includes expenses incurred to provide the instructional service of the Title I activity. An example would be the travel expense of a teacher who had teaching duties in two attendance centers during the day. The expense of such travel would be included in the purchased services column. The 10% reserve may be reflected here to pay an outside person providing professional development to your staff in a Title I SINA school. The LEA should also include in the purchased services column, the required reserve for estimated supplemental education services, as appropriate.

The Supplies column includes approvable amounts for materials and supplies for Title I. The Property column includes approvable amounts for instructional equipment. Other Expenses and Other Uses of Funds, includes expenses for professional dues and the Homeless Education Services set-aside. **Note:** The Homeless Education Services set-aside on the Homeless Education form must match the amount entered on the General Budget form.

✔️ **TIP:** Indirect Costs go under Function 2300.
<table>
<thead>
<tr>
<th>Expenditure Accounts</th>
<th>Salaries 100</th>
<th>Employee Benefits 200</th>
<th>Purchased Services 300-999</th>
<th>Supplies 600</th>
<th>Property 700</th>
<th>Other Expenses 800</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Instructional Staff and Support 2200</td>
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<td>Travel Between Bldgs</td>
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</table>

**Function 2200 – Instructional Staff and Support Services** – Purchased Services includes amounts for inservice and travel. May also include the 10% reserve for sending staff from a Title I SINA building to professional development outside the district.

<table>
<thead>
<tr>
<th>Expenditure Accounts</th>
<th>Salaries 100</th>
<th>Employee Benefits 200</th>
<th>Purchased Services 300-999</th>
<th>Supplies 600</th>
<th>Property 700</th>
<th>Other Expenses 800</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration Support Services 2300</td>
<td></td>
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<td>Summer School Coord.</td>
<td>FICA</td>
<td>Audit (if Eligible)</td>
<td>Indirect Costs</td>
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<td></td>
<td>Title I Coord (SEA Approved)</td>
<td>IPERS</td>
<td>Other</td>
<td>Other Costs</td>
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<td>Clerical Salary</td>
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<td>Other Description</td>
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</tbody>
</table>

**Function 2300 – Administration Support Services** – Salaries and Employee Benefits for the administration of Title I programs cannot be paid from Title I funds. There are two notable exceptions to this rule:

1. When the project is of sufficient size and scope to merit an administrator. **The SEA makes the final decision as to size and scope.**

2. When summer school activities are of sufficient size and scope to merit an administrator. Again, the SEA makes the final decision as to size and scope. A letter must be sent to the Title I office stating that the director of the summer school is not otherwise under General Fund contractual obligation to the district.

LEAs that expend more than $300,000 annually in Federal funds may use Title I funds to pay the expense of an audit that is incurred as a direct result of the Title I program. Since an audit will be made after the close of the fiscal year, it is recommended that funds in the current budget be set aside to pay the cost of the preceding year's program audit. This audit expense would be shown in the Purchased Services column.

Approvable amounts for restricted indirect costs are to be entered on the Title I project budget in the column, Other Expenses and Other Uses of Funds. **Indirect Costs** are those costs that are not readily identifiable with the activities or contracted services, but are nevertheless incurred for the joint benefit of those activities and programs of the organization. **NOTE:** Indirect cost expenditures must comply with the U.S. Office of Management and Budget Circular A87.

The indirect cost rate percentages for each LEA can be found at the Iowa Department of Education website at https://www.educateiowa.gov/indirect-cost-rate. The restricted indirect cost percentage can be applied only to the amounts of salaries and employee benefits (current and carryover budgets) approved for Title I staff.

The Iowa Department of Education annually calculates the indirect cost rates for LEAs from data submitted on their certified annual reports. The Iowa Restricted Indirect Cost Plan for LEAs establishes maximum predetermined rates for a given fiscal year. The advantage of an Indirect Cost Allocation Plan and rate is that it is a simplified means for determining a fair share for indirect costs of Federal grants and contracts. For information regarding the indirect cost rate calculation, contact Janice Evans, School Administration Consultant at 515/281-4740 or janice.evans@iowa.gov.

The indirect cost rate percentages for each LEA can be found at the Iowa Department of Education website at https://www.educateiowa.gov/indirect-cost-rate.
TIP: If the indirect cost amount applied for on the budget exceeds the maximum allowed for budgeted salaries and benefits, a RED warning will be received and will need to be corrected prior to proceeding.

Note: For Title I purposes, the given fiscal year indirect cost rate applies to the project established for the school year and remains in place even when project expenditures extend into the next fiscal year.

<table>
<thead>
<tr>
<th>Expenditure Accounts</th>
<th>Salaries 100</th>
<th>Employee Benefits 200</th>
<th>Purchased Services 300-599</th>
<th>Supplies 600</th>
<th>Property 700</th>
<th>Other Expenses 800</th>
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<td>$0</td>
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</tbody>
</table>

**Function 2600 – Operation and Maintenance of Plant** – An LEA may apply for off-the-top non-instructional expenditures that have incurred as a result of operating a Title I private school site or a Title I migrant education program. Expenses may include rent; lease of real property; utilities; insurance and maintenance costs.

<table>
<thead>
<tr>
<th>Expenditure Accounts</th>
<th>Salaries 100</th>
<th>Employee Benefits 200</th>
<th>Purchased Services 300-599</th>
<th>Supplies 600</th>
<th>Property 700</th>
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<tr>
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<td>IPERS</td>
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<td>Insurance</td>
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</tbody>
</table>

**Function 2700 – Student Transportation Services** – Title I funds may be used to pay the transportation expense of public school students only to Title I activities only when normally scheduled LEA bus service is not available. Examples would include transportation of students between attendance centers, extra bus trips for pre-kindergarten or kindergarten students, and summer school.

The Salaries Column should contain the amount needed to pay the salaries of the bus drivers providing Title I transportation. The Employee Benefits Column would include the employee benefits of the bus drivers. Purchased Services would include any contractual agreement with an outside agency for busing children; the maintenance cost of district buses when they are directly involved in the transportation of Title I students; and off-the-top expenses to transport private school students to public school or neutral site for Title I instructional services. The LEA should also include in the purchased services column, the required reserve for school choice transportation, as appropriate.

**SINA Set-Aside for Choice-Related Transportation and Supplemental Education Services**

The law establishes joint funding for choice-related transportation and SES. Unless a lesser amount is needed to meet demand for choice-related transportation and to satisfy all requests for SES, an LEA must spend an amount equal to 20 percent of its Title I, Part A allocation. If an LEA spends less than the amount needed to meet its 20 percent obligation, it must meet the required assurances (see SINA set-aside section in this document) before it may use unexpended funds from the 20 percent obligation for other allowable activities.

The rules for school choice are:
- In year 1 of identification for SINA or Delay, a district MUST reserve 20% of district allocation for CHOICE (there is no SES requirement for year 1).
- In year 2 or above of identification for SINA or Delay, a district MUST reserve up to 20% of the district allocation for CHOICE AND SES. It is up to the district how the split is made, but between the two spots on the budget (line 2700 column 300 and line 1000 column 300) the total must be at least 20% of district allocation.

In addition, an LEA that spends less than the amount needed to meet its 20 percent obligation and does not intend to spend the unexpended amount in the subsequent school year must maintain records that demonstrate it has met the
criteria above and must notify the SEA that it has met the criteria and intends to spend the remainder of its 20 percent obligation on other allowable activities. Districts must notify the Iowa Department of Education if they do not intend to spend the total 20 percent set aside. Please contact Susan Selby at susan.selby@iowa.gov for the form, “NOTIFICATION – Unexpended Funds for Choice-Related Transportation & Supplemental Education Services” or access it through this link \Ed\data\EDGroup\Title One\Notifications of Unexpended Funds\Notification of unexpended funds 2013.8.29.docx.

Function 3100 – School Nutrition Services – Title I funds may be used for providing food and food services only when they are not covered by State or Federal funds received from the Bureau of Nutrition and Health Services of the Iowa Department of Education. The SEA will review each request individually.

Function 3301 and 3302 – Community Services (Parent) Public and Private – Title I funds may be used for activities associated with Parent Involvement. LEAs receiving allocations of $500,000 or more must reserve 1 percent of the allocation for parent involvement activities, including family literacy and parenting skills. At least 95 percent of the 1 percent reservation must be allocated by formula to Title I funded schools. This reservation needs to be conducted separately from Title I building level allocations. If the district serves private school students, the LEA must correctly calculate and provide for equitable services for private school students regarding parental involvement requirements. If the LEA is required to set aside funds for parent involvement, a proportional amount must be spent for families of private school Title I students. If no set asides, accommodations must be made to include families of private school Title I students in the annual Title I meeting, conferences, and activities such as “Family Literacy/Math Night.” After consultation with private school representatives, the parent involvement requirement can be met either through independent parent involvement activities or in conjunction with the LEA’s activities. If they are done independently, there must be an equitable distribution of funds for these activities. Persons providing Title I services are employed by the LEA. Note: The district should have on file the background information for this budget detail expenditure, but would not be required to include this on the electronic application itself. For example: (see WDTF form for calculations)

Parental Involvement Reservation under Section 1118 of ESEA

In participating public school attendance areas:

<table>
<thead>
<tr>
<th>No. of private school children</th>
<th>Total no. of children</th>
<th>Proportion of from low-income families</th>
<th>Reservation from low-income families</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Proportion of Reservation divided by Reservation = $ Proportion of Reservation X Reservation = $

✔ TIP: If applicable, the 1 percent reservation must be included in the general budget before approval will be
given to your application. To remain in full compliance, the required 1% set-aside for parent involvement must be spent during the current school year.

After all detail is completed, the user should click the Finish button. The user must fix all errors appearing in RED. The user must verify the YELLOW warning errors. A yellow highlight is simply a reminder to check your work.

✔️ TIP: Do NOT double-click the Finish button.

Note: If the indirect cost exceeds the maximum allowed for the salaries and benefits on the budget, a RED warning will be received and will need to be corrected prior to proceeding.

Allowable Program Expenditures for Title I Services to Private School Children:

Title I funds are expended to implement academic research-based programs that help students improve their academic achievement in the regular private school classrooms (i.e., reading, mathematics, etc.). Title I program expenditures can include the following:

1. Salaries and fringe benefits for highly qualified teachers directly hired by the LEA;
2. Salaries and fringe benefits for qualified paraprofessionals directly hired by the LEA and supervised by highly qualified public school teachers who are located in the same building;
3. LEA contracts with retired public or private school teachers to teach at the private school during the school day and before or after school;
4. Books, materials, and equipment necessary to implement the Title I program (The LEA retains title to the books, other materials, and equipment purchased with Title I funds. Materials, etc., purchased with Title I funds may be used only by Title I participants. Each item purchased with Title I funds must be labeled “Property of [School District].” The labels should not be either easily erased or removable.);
5. Extended-day services;
6. Summer programs;
7. Saturday programs;
8. Counseling programs;
9. Computer-assisted instruction (CAI) with non-instructional computer technicians who supervise computer labs, maintain discipline, and escort students to and from class (Their salaries are an administrative cost under Sec 200.77(f) of the Title I regulations and may not be charged to funds generated by private school children from low-income families, which is for instruction.);
10. Home tutoring;

When all information has been entered on the General Budget form, the user may collapse the budget data to see an Expenditure Summary of total budget figures in each category by clicking the Collapse All button. The user may also collapse only certain budget rows by clicking at the far left of the budget table.
Note: The budget table may also be expanded by row by clicking at the far left of the row or in whole by clicking the Expand All button. After all errors are corrected, the accuracy of the figures entered on the General Budget form verified, and the user has clicked the Finish button, you should receive the “District Finished” status for the General Budget form.

If a need arises to change budget figures prior to clicking the Submit button, the user may click the General Budget form on the Title I Home screen and click the Undo button on the General Budget form. This action will allow the user to make revisions to the budget as necessary. The user will need to click the Finish button and resolve any validation edits before again achieving the “District Finished” status. Note: Once the LEA submits the application, no changes can be made at the local level.

✔ TIP: It is advisable to visit with the Title I office prior to using the Undo option.

The Title I staff will not proceed with processing your application until all required forms have been completed and the Submit button is clicked. The Submit button will not become available until all required forms have been completed.

✔ TIP: Before the district will be able to submit the application, all of the following forms need to be completed:
   Assurances, Selection of Schools, General Budget, Homeless Education, Staff Assignments, Title I Narratives, Upload Parent Involvement Policy and Student Compact, General Carryover (as applicable), Equipment Inventory (as applicable), Statement of Agreement (as applicable), Within District Targeting of Funds (as applicable), Delinquent Application (as applicable).

Note: Forms not completed are indicated by “District not Updated” on the status table of the Title I Home screen.

The Staff Assignments form is required when salary amounts are indicated in the budget. If a staff count is added to the Staff Assignments form, then staff salaries must be added to the budget; and conversely, if a staff salary is included in the budget, then a staff count must be added to the Staff Assignment form. For associated budget types, in this case General and General Carryover, if staff assignments are input for a budget type, then EITHER of the budget’s salary amounts satisfies the salary requirement.

Note: If the district has one or more buildings designated as a school in need of assistance (SINA), the Within District Targeting of Funds (WDTF) form must be completed prior to being granted the ability to certify the budget.

Upon completion of all required forms, the Submit button will appear at the bottom of the status table on the Title I Home screen. Clicking the Submit button will send an automatic email to notify the SEA that the district has completed the application process.

LOCAL NEGLECTED BUDGET

The local education agency is the fiscal agent for any funds designated to provide Title I service to children in local neglected institutions. Local neglected program costs must be part of the General Budget. If your LEA provides Title I service to a local neglected facility with Title I, Part A local neglected funding, you must designate those costs in the appropriate expenditure categories on the Title I General Budget form.

Note: Local delinquent education program funds are separate from the current allocation and are to be applied for as a separate project on the Delinquent Application, with a separate budget and separate accounting.

When all information has been entered click the Finish button and then the Collapse All button. After verifying the accuracy of the figures entered on the General Budget Expenditure Summary, click the Finish button. If any error or warning message appears, you must correct or at least verify data that has been entered and click the Finish button again. Note: If you have any required forms not completed, you will not be allowed to submit your Title I application.

If the LEA has carryover funds from the previous year, a separate budget must be completed and certified to reflect the use of the carryover funds.

Click Carryover Budget form or Homeless Education form on the Title I Home screen to be completed next.
Note: The Carryover Budget form must be completed in order to receive Title I funding carried over from the previous year.

For technical assistance on the carryover budget process, contact the Title I consultant for your particular AEA.

All required forms must be completed before the State Title I office will approve the budget and release funds for the current school year.

Carryover funds are previous year current allocation funds that were not applied for by the LEA in the previous school year budget. Funds that were applied for by the LEA in the previous school year budget but not actually spent as part of the previous school year costs only become available carryover funds for the LEA through an electronic amendment process. All carryover funds are limited by Title I legislation to a maximum 15 percent of the allocation for LEAs receiving $50,000 or more. A waiver of the 15 percent maximum carryover limitation is available to LEAs once every three years. The minimum carryover that may be applied for is $1,000. Applications for use of carryover funds will require completion of the Title I Carryover Budget forms.

If your LEA has carryover funds available, click Carryover Budget on the Title I Home screen.

Complete the Carryover Budget form following the same procedures used for the General Budget form. If your LEA does not have available carryover funds or has successfully completed the Carryover Budget form, use the Title I Home screen to make the next selection.

Note: A carryover allocation requires separate accounting.

✔ TIP: Any expenditure covered by local general fund dollars must NOT be included in this budget.

Click Homeless Education form on the Title I Home screen to be completed next.
HOMELESS EDUCATION

Note: The Homeless Education form must be completed in order for the Title I application to be approved.

For technical assistance regarding Homeless Education contact Sandy Johnson at sandra.johnson@iowa.gov; or 515/281-3965.

Children and youth in homeless situations are automatically eligible for Title I services whether or not they live in a Title I school attendance area or meet the academic standards required of other children for eligibility. Homeless children may receive Title I educational or support services from schoolwide and targeted-assistance school programs. The LEA must provide comparable services to a homeless student who does not attend a Title I school.

LEAs may provide support services to children in shelters and other locations where homeless children live. Services should be provided to assist homeless students to take advantage of educational opportunities.

The Homeless Education form is required for all local education agencies. This form must be completed before the district will be allowed to submit the Title I application and receive Title I funds.

The user should have entered on the Contacts form the contact information for the Local Homeless Liaison. A Local Homeless Liaison is a local education agency staff member (other than the district Superintendent) who is responsible for ensuring the identification, school enrollment, attendance, and opportunities for academic success of students in homeless situations. (e.g. Guidance Counselor, At-Risk Coordinator, etc.).

Mandatory Reservation of Funds

Section 1113©(3)(A) states: “A local education agency shall reserve such funds as necessary under this part to provide services comparable to those provided to children in schools funded under this part to serve homeless children who do not attend participating schools, including providing educationally related support services to children in shelters and other locations where children may live.”

All public schools and districts receiving federal funds must ensure that services are provided to children and youth who are experiencing homelessness. To assist with these services, the law requires that school districts set aside Title I funds, as necessary, to provide services comparable to those that are provided to children in Title I, Part A funded schools. These funds can also support educationally related services to children in shelters and other locations where homeless children may live. The services provided with these funds should support homeless students to succeed in school and to meet the academic achievement standards.

An LEA must reserve Title I funds to make sure that homeless students receive Title I services regardless of their school of enrollment. LEAs can develop formulas for reserving the appropriate amount of Title I funding for homeless students as required in Section 1113 (c)(3)(A) of NCLB. The set-aside funds may then be used to serve the needs of any homeless student in the district.

An LEA has the discretion to use reserved funds to provide a homeless student with services that are not ordinarily provided to other Title I students and that are not available from other sources.

Iowa requires Title I districts to indicate the Title I, Part A homeless set-aside amount and formula on the annual Title I application.
If a district has students who meet the definition of homelessness according to McKinney-Vento, there are some strategies on how Title I homeless set-aside funds may be used in Title I and non-Title I schools. Prior to making decisions about the use of homeless set-aside funds, LEAs must consider the following:

**Supplement, not Supplant:**
- Title I funds never pay for items or services required by another federal, state, or local law. For example, Title I X (McKinney-Vento Homeless Assistance Act) of NCLB requires districts to transport homeless students to their school of origin. Title I funds may not be used to pay for this service.

**Homeless liaison:**
- Title X permits the use of Title I funds to pay all or part of the salary of the district homeless liaison, but this person must also be assigned Title I duties not related to homeless duties.

**Title I as a last resort:**
- Title I may be used to pay for non-educational services, including medical care supplies, such as eyeglasses or social services, but only if these services are not available from any other source in the community. Services must be linked to the student’s educational needs.

**No food, no housing:**
- Title I funds may never be used to pay for a homeless family’s lodging or food.

**Other ideas for use of Title I set-aside funds:**
- Pay for tutors for homeless students (can included remedial or accelerated instruction).
- Before-school/After-school, and/or summer programs.
- Purchase school supplies.
- Pay fees for school-sponsored field trips or school-related family activities.
- School clothing to meet district requirements (uniforms, PE clothes, including shoes for PE).
- Pay for medical/dental services that if unmet, would present a barrier to school attendance (eyeglasses, dental care, immunizations).
- Reimburse mileage for staff who have to travel in order to provide direct services to homeless students.
- Graduation cap and gown/graduation fees.
- Birth certificates necessary to enroll in school.
- Counseling services/domestic violence counseling services.

**Some not allowable uses of Title I set-aside funds:**
- Physicals for sports participation or sports uniforms.
- Clothing for family members.
- Rent/motel/hotel (any housing expenses).
- Prom dresses/tuxedos.
- Yearbooks fees

The two numbers above have been pre-populated from spring 2013 Student Reporting in Iowa (SRI) data. The LEA may change the first number to reflect more current data. If the first number is not updated, the LEA will be verifying that the number is correct. The LEA is not allowed to change the second number.

**NEW U.S. Department of Education Policy Change – FY2014**

Title I Set-aside Funds for Support of Homeless Children and Youth

The following new information applies only to funds subject to authority in FY2014 Appropriations Act

The FY2014 Omnibus Funding Bill included a significant policy change regarding the use of Title I, Part A funds to support homeless children and youth. The legislation specifically allows the use of Title I, Part A dollars to “…provide homeless children and youths with services not ordinarily provided to other students under those sections, including supporting the
liaison designated pursuant to Section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act, and providing transportation pursuant to Section 722(g)(1)(J)(iii) of such Act."

This policy will apply to the FY2014 Title I, Part A funding (Basic, Concentration, and Targeted Grants) that becomes available to States on July 1, 2014. It reserves a U.S. Department of Education interpretation of the Title I, Part A statute which prohibited the use of Title I, Part A dollars to transport homeless children and youth to their schools of origin. It also clarifies that Title I, Part A dollars can serve the unique needs of homeless students by providing services different from those ordinarily provided with Title I, Part A funds, and that Title I, Part A funds can support McKinney-Vento homeless liaisons.

Visit [http://center.serve.org/nche/legis/2014-omnibus.php](http://center.serve.org/nche/legis/2014-omnibus.php) for more information about Title I and homelessness and the requirement for school districts to reserve funds to provide educationally related support services to homeless children.

**What does this mean?**

FY2014 Title I, Part A funds can be used for school of origin transportation, but the required set aside for comparable services must still be reserved. The Appropriations Act affords an LEA new, additional authority to use fiscal year 2014 Title I funds to pay for the homeless liaison FTE and for the excess cost to transport homeless students to their school of origin. However, this option does not replace the required (or regular) homeless set-aside.

- The new authority in the FY2014 Appropriations Act in no way removes the requirement under Section 1113(c)(3)(A) of the Elementary and Secondary Education Act of 1965, as amended (ESEA), that a local education agency (LEA) reserve the amount of Title I funds that is necessary to provide comparable Title I services to homeless children attending non-Title I schools.
- An LEA may continue to use Title I set-aside funds to provide comparable services to homeless students attending Title I schools and non-Title I schools that are not ordinarily provided to other Title I students, such as those described in the Title I, Part A Use of Funds Guidance at [www2.ed.gov/programs/homeless/homelessg11.doc](http://www2.ed.gov/programs/homeless/homelessg11.doc).
- The new “optional” reservation does not replace the Section 1113(c)(3)(A) requirement:
  - **Transportation:** New authority expands the use of Title I set-aside funds to be used for incremental cost of transporting homeless children/youth to and from the school of origin. This option is additional to the required set-aside funds used to provide reasonable and necessary services for instructional and educational support.
  - **Support of Homeless Liaison:** Supporting the liaison designated pursuant to Section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act with salary support devoted to liaison duties up to the full FTE.

### Examples

**District A:** reserves $5000 as the Title I homeless set-aside for instructional and related services to homeless children and youth. Under Section 1113(c)(3)(A), this is the required reservation for comparable services. District A may reserve an optional amount for incremental costs of transporting homeless students to and from their school of origin.

<table>
<thead>
<tr>
<th>Title I Homeless Set-Aside</th>
<th>Required $5000 plus the Optional $2000 for transportation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Required Set-Aside</td>
<td>$5000 (services such as tutoring, etc.)</td>
</tr>
<tr>
<td>Optional Set-Aside</td>
<td>$2000 (incremental transportation costs)</td>
</tr>
</tbody>
</table>

**District B:** reserves $5000 as the Title I homeless set-aside for comparable service as required; but chooses not to reserve for incremental costs of transportation to and from school of origin.

| Required Set-Aside        | $5000 (services such as tutoring, etc.)                 |
| Optional Set-Aside        | $0 (incremental transportation costs)                   |

**Note:** The Optional Set-Aside does not replace the Required Set-Aside for comparable services.
As part of the Title I, Part A online application, all districts will:

- Indicate the method chosen to set aside an amount for homeless children and youth.
- Indicate the Title I dollar amount set aside for Homeless Student Services in non-Title I buildings (including middle schools and high schools).
- Describe how the services for homeless students attending non-Title I buildings will be coordinated and integrated with Title I, Part A services and relate to the set aside funds.

The Homeless Assurances as noted above must be read and agreed to in order for the Title I application to be approved.

Once all data has been entered on the Homeless Education form, the user should click the Finish button and address any validation edits. When the form is accepted, the user will be returned to the Title I Home screen and the Homeless Education form will be moved to the bottom of the list with the “District Finished” status.

✔️ TIP: Do NOT double-click the Finish button.

*Click the Staff Assignments form to be completed next.*
Iowa Department of Education

STAFF ASSIGNMENTS

Note: The Staff Assignments form must be completed in order for the Title I application to be approved.

For technical assistance on the staff assignments form, contact the Title I consultant for your particular AEA.

On this form you should report Title I staff paid from the general budget or general carryover budget, as applicable. The user will enter all required information on Title I staff on this form. You must enter whole numbers for the number of staff. The program will accept numbers like 2.5 for the FTE, but will not accept mixed numbers for the actual number of staff. You are not required to enter FTE data on the budget form.

Enter the number of staff assignments for which salary payments will be made from Title I funds for services to be performed in this program in schoolwide as well as targeted assistance buildings. Title I teachers and Title I paraprofessionals must operate according to Title I regulations for the percentage of the day during which they are paid with Title I funds. All Title I funded instructional paraprofessionals in targeted assistance buildings must be highly qualified. Regardless of funding source, all instructional paraprofessionals in a Title I schoolwide building must be qualified under NCLB. New schoolwide program buildings must have highly qualified paraprofessionals from the beginning of the schoolwide program. Title I reading teachers must have a reading endorsement. Title I math teachers need no additional endorsement.

TIP: You must enter whole numbers for the program to accept your data in the above staff section.

Complete the full-time equivalency (FTE) for staff assignments for the regular term. The FTE of a staff member must reflect that part of the staff member’s salary paid by Title I. Title I funded personnel (Title I teacher and Title I paraprofessional) in a targeted assistance program must operate according to Title I regulations for the percentage of the day during which they are paid with Title I funds. The user should round this figure (FTE) to the nearest tenth of a percent (e.g. 3.4). Note: If carryover funds are used for partial salaries, it will be necessary to prorate the FTE on both the General and Carryover Budgets. For example: assume that you have $5,000 available in carryover funds. The carryover funds represent 20 percent of the salary, so you should report one (1) teacher at .8 FTE on the General Budget form and one teacher with a FTE of .2 on the Carryover Budget form.
Enter the number of staff for any summer school program that is part of the project. Note: Summer school salaries must be broken out on the General Budget form.

The terms certified, paraprofessional (educational associates), and supportive personnel are defined as follows:

1. Certified - These are the teachers who have been employed to perform the teaching activities described in this application. Teachers with responsibility for any remedial reading instruction must have a reading endorsement. Any questions regarding a reading endorsement must be directed to the DE Board of Educational Examiners. Note: Title I math teachers need no additional endorsement.

2. Paraprofessional (Educational Associates) – For the purposes of Title I, Part A, a paraprofessional is an employee who provides instructional support in a program supported with Title I, Part A funds. Instructional support includes individuals who (1) provide one-on-one tutoring for eligible students if such tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher; (2) assist with classroom management, such as organizing instructional and other materials; (3) provide instructional assistance in a computer laboratory; (4) conduct parental involvement activities; (5) provide support in a library or media center; (6) act as a translator; or (7) provide instructional support services under the direct supervision of a teacher. Note: Individuals who work in food services, cafeteria or playground supervision, personal care services, non-instructional computer assistance, and similar positions are not considered paraprofessionals under Title I.

3. Supportive - This term refers to both certified and non-certified staff that will be employed to assist and support the activities described in this application. Note: In addition to the above-mentioned positions, it may be necessary to use Title I funds to employ on an hourly basis bus drivers, food service employees and additional custodial help. Do not include such personnel of this type in this section. However, such personnel should be identified and included in the Title I General Budget.

A highly qualified paraprofessional is one who has (1) completed 2 years of study at an institution of higher education; or (2) obtained an associate’s (or higher) degree; or (3) met a rigorous standard of quality and been able to demonstrate, through a formal state or local academic assessment, knowledge of and the ability to assist in instructing reading, writing, and mathematics (or, as appropriate, reading readiness, writing readiness, and mathematics readiness); or (4) obtains the paraprofessional certificate offered through the Board of Educational Examiners. For more information on qualified paraprofessionals, please refer to the Title I Paraprofessionals Guidance on the Iowa Department of Education web site at https://www.educateiowa.gov/pk-12/learner-supports/paraed.

The table below should be completed to show the number of paraprofessionals entered as Title I funded staff. Enter the number of paraprofessionals in schoolwide and/or targeted assistance buildings and the educational level of each.

✔ TIP: The total number of paraprofessionals shown above should match the total number reported in the following table.

For LEAs with a schoolwide program, the user should enter the total number of paraprofessionals providing instructional services in Title I schoolwide buildings, regardless of funding source. For LEAs with a targeted assistance program, the user should enter the number of Title I funded paraprofessionals employed within the district providing instructional services within a targeted assistance building. Record each paraprofessional only once. If paraprofessionals are only used for summer school, please remember to complete this section for the summer school staff as applicable. Note: Do not include in this section any staff classified as “Certified” or “Supportive.”

All Title I funded instructional paraprofessionals in targeted assistance buildings and all instructional paraprofessionals regardless of funding source in Title I schoolwide buildings must be highly qualified; no exceptions are permitted. New schoolwide buildings must have highly qualified paraprofessionals from the beginning of the schoolwide program service...
delivery model. There are no extensions of the highly qualified requirement; a paraprofessional must be highly qualified upon employment. This is a requirement that the U.S. Department of Education is closely monitoring. To be considered highly qualified, a paraprofessional must have met one of the following criteria: completed two years of study at an institution of higher education; or obtained an associate’s (or higher) degree; or obtained voluntary para-educator certification through the Iowa Board of Educational Examiners; or completed district determined assessments such as Work Keys, COMPASS, etc.

All Title I paraprofessionals must have a secondary school diploma or its recognized equivalent. This includes paraprofessionals who serve as translators or who conduct parental involvement activities.

Please enter the number of paraprofessionals broken out by level. The sum of the “Educational Level” numbers should equal the sum of the two “Title I Funded Buildings” totals above. Click the Finish button to save data and perform edit validations. If no error messages are received, see the next paragraph to determine the need for the following staff certification documents or you may proceed to the next form in your Title I application process.

✔ TIP: Do NOT double-click the Finish button.

A requirement from the U.S. General Accounting Office requires time sheets or work logs to be maintained for ALL staff paid from federal sources. Local education agencies with Title I staff funded from a single federal funding source, may use a certification form similar to the sample following. LEAs must document split funded or partial funded Title I positions on time sheets or work logs similar to the following sample. Please note that this documentation represents a semi-annual certification of time and effort rather than just hours on paper; and should be signed after the fact, to authenticate the certification process. If you have questions regarding the use of these forms, please contact the auditor for your district.

Click Within District Targeting of Funds form to be completed next.
1. **Definition of paraprofessional:**
For the purposes of Title I, Part A, a paraprofessional is an employee who provides instructional support in a program supported with Title I, Part A funds.

This includes paraprofessionals who (1) provide one-on-one tutoring if such tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher, (2) assist with classroom management, such as organizing instructional and other materials, (3) provide instructional assistance in a computer laboratory, (4) conduct parental involvement activities, (5) provide support in a library or media center, (6) act as a translator, or (7) provide instructional support services under the direct supervision of a teacher [Title I, section 1119(g)(2)].

Individuals who work in food services, cafeteria or playground supervision, personal care services, non-instructional computer assistance, and similar positions are not considered paraprofessionals under Title I.

2. **Requirements:**
Title I paraprofessionals whose duties include instructional support must have (1) completed two years of study at an institution of higher education; or (2) obtained an associate's (or higher) degree; or (3) met a rigorous standard of quality and be able to demonstrate, through a formal State or local academic assessment, knowledge of and the ability to assist in instructing reading, writing and mathematics (or, as appropriate, reading readiness, writing readiness, and mathematics readiness); or (4) obtain a voluntary certification course offered through the Board of Educational Examiners.

Title I paraprofessionals must have met these requirements by the end of the 2005-2006 school year.

**All** Title I paraprofessionals must have a secondary school diploma or its recognized equivalent. This includes paraprofessionals who serve as translators or who conduct parental involvement activities.

3. **Paraprofessional Assessment:**
   - LEAs should carefully choose an assessment that will measure the knowledge of and ability to assist in instructing reading, writing and mathematics (or as appropriate, reading readiness, writing readiness, and mathematics readiness). The criterion established for approval as a paraprofessional under No Child Left Behind Act must be rigorous and defendable. Examples of measures available to LEAs include Work Keys (which has been normed for paraprofessionals), Parapro Assessment from ETS, and COMPASS from ACT. Many Iowa LEAs have established a COMPASS score cut-off at 150. The score of 150 was obtained by determining that a Reading score of 57, a Writing score of 50 and a Math score of 43 were appropriate sub scores for passing the COMPASS. The assessment chosen must ensure that more than just basic skills are being assessed.

4. **Recommendation:**
   - All LEAs should encourage their paraprofessionals, even those who have already been approved using an assessment, to go through the voluntary certification course offered through the Board of Educational Examiners. For information regarding this certification course, contact the Iowa Board of Educational Examiners at 515/281-3245. Federal funds, including Title I funds, can be used to assist paraprofessionals complete this coursework.

   ► No good faith extensions. All paraprofessionals must be qualified at the time of employment.

Useful resource: “Paraprofessional Requirements for Iowa Schools” at educateiowa.gov/index.php?option=com_content&task=view&id=773&Itemid=1297.
Paraprofessional Requirements
No Child Left Behind Act (NCLB)

Are Title I funds (Part A) used in this school building?

YES
Is the Title I program a Targeted Assistance Program or a Schoolwide Program?
Refer to Chart A and Chart B.

NO
No further action is required. If the LEA does not receive Title I funds, the requirements do not apply. Similarly, if the LEA receives Title I funds, but a school does not receive Title I funds, the requirements do not apply to paraprofessionals working in that school.

Chart A
Targeted Assistance Program (TAP)
Are the paraprofessionals funded by Title I dollars?

YES
The paraprofessional(s) must meet NCLB certification requirements.

NO
No further action is required.

Chart B
Schoolwide Program (SWP)
NCLB paraprofessional requirements apply to all paraprofessionals that provide instructional support duties in a schoolwide program without regard to the source of funding that supports the position.
Certification for Employee Funded from Federal Funding Source
XYZ Community School District

I am an employee of the XYZ Community School District. During the 2011-2012 school year, I am aware of my position and funding as shown below.

I understand that if my “Status” is listed below as “Single” which indicates all of the funding for my position is through one federal funding source, I am required to sign this certification at the end of each semester.

I understand that if my “Status” is listed below as “Multiple” which indicates I am funded through more than one federal funding source, I am required to submit an activity sheet for split funded employee’s each pay period throughout the year.

<table>
<thead>
<tr>
<th>ID</th>
<th>Name</th>
<th>Bldg</th>
<th>Position</th>
<th>FTE</th>
<th>Funding</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>0405</td>
<td>In Cls Reading</td>
<td>1.0</td>
<td>Title I</td>
<td>Single</td>
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<table>
<thead>
<tr>
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<th>Bldg</th>
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<th>FTE</th>
<th>Funding</th>
<th>Status</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>0409</td>
<td>In Cls Reading</td>
<td>.50</td>
<td>Drop Out Prevention</td>
<td>Multiple</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0409</td>
<td>In Cls Reading</td>
<td>.50</td>
<td>Title I</td>
<td>Multiple</td>
</tr>
</tbody>
</table>

The duties I performed during the first semester were exclusively related to the funds listed above.

______________________________  ______________________
Employee Signature                  Date

______________________________  ______________________
Supervisor Signature               Supervisor Title       Date

The duties I performed during the second semester were exclusively related to the funds listed above.

______________________________  ______________________
Employee Signature                  Date

______________________________  ______________________
Supervisor Signature               Supervisor Title       Date

This form will be retained in the principal/supervisor’s office for 3 years.
Activity Sheet for Split Federally Funded Staff  
XYZ Community School District

I am an employee of the XYZ Community School District. During the 2011-2012 School Year, I am aware of my positions and funding as shown below. I understand that because I am funded through more than one funding source I need to turn in the following activity sheet for every pay period.

**Pay Period Dates:**

<table>
<thead>
<tr>
<th>ID</th>
<th>Name</th>
<th>Bldg</th>
<th>Position</th>
<th>FTE</th>
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<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>00</td>
<td></td>
<td></td>
<td>IN CLS READING</td>
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<td>DROP OUT PREVENTION</td>
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Week 1

<table>
<thead>
<tr>
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<th>SUN</th>
<th>MON</th>
<th>TUE</th>
<th>WED</th>
<th>THR</th>
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<td># of hours</td>
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Week 2

<table>
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<th>SUN</th>
<th>MON</th>
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<table>
<thead>
<tr>
<th>ID</th>
<th>Name</th>
<th>Bldg</th>
<th>Position</th>
<th>FTE</th>
<th>Funding</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>00</td>
<td></td>
<td></td>
<td>IN CLS READING</td>
<td>0.50</td>
<td>TITLE I</td>
<td>Multiple</td>
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</table>

Week 1

<table>
<thead>
<tr>
<th>DATE</th>
<th>SAT</th>
<th>SUN</th>
<th>MON</th>
<th>TUE</th>
<th>WED</th>
<th>THR</th>
<th>FRI</th>
</tr>
</thead>
<tbody>
<tr>
<td># of hours</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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</table>

Week 2

<table>
<thead>
<tr>
<th>DATE</th>
<th>SAT</th>
<th>SUN</th>
<th>MON</th>
<th>TUE</th>
<th>WED</th>
<th>THR</th>
<th>FRI</th>
</tr>
</thead>
<tbody>
<tr>
<td># of hours</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Employee Name ____________________  Employee Signature ____________________  Date ____________

Principal/Supervisor Signature ____________________  Date ____________

**Absence Codes**

- B – Bereavement: 1.0 – 7.75 hours
- EM – Emergency: 0.9 – 7 hours
- F – Funeral: 0.8 – 6 hours, 10 minutes
- H – Holiday: 0.7 – 5 hours, 30 minutes
- I – Personal Illness: 0.6 – 4 hours, 40 minutes
- J – Jury Duty: 0.5 – 3 hours, 52 minutes
- O – Other: 0.4 – 3 hours, 05 minutes
- PB – Personal Business: 0.3 – 2 hours, 15 minutes
- J – Jury Duty: 0.2 – 1 hour, 35 minutes
- O – Other: 0.1 – 45 minutes

**Time Expectations for 7.75 hour day**

1.0 – 7.75 hours

0.9 – 6 hours, 45 minutes

0.8 – 6 hours

0.7 – 5 hours, 15 minutes

0.6 – 4 hours, 30 minutes

0.5 – 3 hours, 45 minutes

0.4 – 3 hours

0.3 – 2 hours, 15 minutes

0.2 – 1 hour, 30 minutes

0.1 – 45 minutes

**Time Expectations for 7.50**

1.0 – 7.5 hours

0.9 – 6 hours, 45 minutes

0.8 – 6 hours

0.7 – 5 hours, 15 minutes

0.6 – 4 hours, 30 minutes

0.5 – 3 hours, 45 minutes

0.4 – 3 hours

0.3 – 2 hours, 15 minutes

0.2 – 1 hour, 30 minutes

0.1 – 45 minutes

*This form will be retained in the principal/supervisor’s office for 3 years.*
Within District Targeting of Funds

Note: The Within District Targeting of Funds (WDTF) form must be completed in order for the Title I application to be approved.

The Selection of Schools form must be “District Finished” status before attempting to complete the Within District Targeting of Funds form. To assist the user in completing the WDTF form, click on the Within District Targeting Funds Worksheet button to download these documents from the Iowa Department of Education web site.

For technical assistance on the Within District Targeting of Funds form, contact the Title I consultant for your particular AEA.

The Title I application process requires documentation for appropriately targeting funds to Title I buildings. All districts are required to complete this form.

✔ TIP: Approval of the Title I application requires documentation for appropriately targeting funds to buildings, including private schools.

Individual districts will determine set aside amounts appropriate to the district, e.g. Title I summer schools, homeless funds for non-Title I schools, DINA, local neglected programs, parent involvement. See Within District Targeting of Funds worksheet for more examples.
Directions for
Within District Targeting of Funds (WDTF) WORKSHEET

WDTF Requirements:
- All schools with 75% or above F/R Lunch rate must be served
- LEA must allocate funds to building in F/R Lunch rate rank order
- LEA may serve schools at or above 35% F/R Lunch rate
- LEA may serve schools at or above the district wide F/R Lunch rate
- LEA must allocate higher amount to schools with higher poverty
- PPA (Per Pupil Allocation) may vary between schools, grade spans, or poverty levels
- Any school with 75% F/R Lunch rate must receive a PPA greater than or equal to schools below 75%
- LEA must allocate an equitable share for services to pupils at private schools
- LEA maintains worksheet(s) on file to document calculations

Districts with SINA 3/Delay 3 or higher Title I schools must refer to worksheet pages 3 and 4.

STEP 1.
A. Begin with the regular Title I allocation.
B. Subtract the reserve or set-aside amounts (refer to WDTF Set-Asides)
C. Add Carryover Funds
D. Determine total amount for allocating to Title I schools

STEP 2.
Calculate the PPA (Per Pupil Allocation) based on the total of low-income students (including private school low-income students) in Title I participating areas or schools.
**Within District Targeting of Funds Set-Asides**

**STEP 1.**

**A.** Title I Funds (Regular Allocation)

**B.** Minus Set-asides:

- **DINA Professional Development** ______________ ...10% of Dist. Allocation required for DINA1, Delay1, DINA2, Delay2
- **SINA – School Choice** ______________
- **SINA – Supplemental Educational Services (SES)** ______________
- **Services for neglected children** ______________ ...amount equal to the grant received for these programs
- **Services for homeless children** ______________ ...may include services at shelters, etc
- **Parent involvement** ______________ ...1% must be reserved if district allocation exceeds $500,000
- **Administrative costs** ______________ ...differential salary and fringe benefit costs for Title paid teachers
- **Audit cost** ______________ ...only LEAs that expend at least $300,000 of federal funds per year
- **Professional development** ______________ ...10% of Bldg. Allocation required for SINA1, Delay1, SINA2, Delay2
- **Summer or intercession programs** 
- **Preschool programs** 
- **Indirect costs** 

**TOTAL SET-ASIDES:**

\[ B \]

\[ \text{(sum of all set-asides)} \]

**C.** PLUS CARRYOVER FUNDS:

\[ C \]

**D.** TOTAL AMOUNT to be allocated among the schools:

\[ D \]

**STEP 2.**

\[ \frac{\text{Title I Funds}}{(\text{Total allocation minus set-asides} - \text{Line D})} \div \frac{\text{(Title I schools total of low-income students)}}{(\text{PPA})} = \text{______________________} \]
To determine PPA and WDTF allocations in districts with SINA 3/Delay 3 or above schools:

**Method 1 – Basic method**

Begin with current budget year Title I allocation
Subtract set-asides (see page 2 above)
Add any carryover funds
WDTF allocations are calculated on the number of low-income students in Title I served schools only
Identify SINA 3/Delay 3 and above schools
If school is SINA 3/Delay 3 and above, the current PPA allocation must be greater than or equal to last year’s PPA allocation x .85

To determine PPA and WDTF allocations for eligible schools with SINA 3/Delay 3 or above schools using a tiered allocation system:

**Method 2 – Method for districts using a tiered allocation system**

Begin with current budget year Title I allocation
Subtract set-asides (see page 2 above)
Add any carryover funds
WDTF allocations are calculated on the number of low-income students in Title I served schools only

First Allocation – “Pre-Reservation”

**Step a1** – Allocation – set-asides (not including SINA set-asides) = New District Total to be allocated

<table>
<thead>
<tr>
<th>General Budget</th>
<th>General Carryover</th>
<th>Set-asides</th>
<th>New District Total (to allocate to served buildings)</th>
</tr>
</thead>
</table>

**Step a2** – Allocate considering tiered system

<table>
<thead>
<tr>
<th>School (“x” if SINA/Delay 3+)</th>
<th>Grade levels</th>
<th>Low-income %</th>
<th># Public low-income</th>
<th># Private low-income</th>
<th>Total # low-income</th>
<th>Building PPA allocation</th>
<th>Building allocation</th>
<th>* 85% of 2013-14 PPA</th>
</tr>
</thead>
</table>

Note: Total of building allocations must be within +/- 3% of New District Total

**Step a3** – Determine 85% PPA for all buildings designated SINA/Delay 3 and above (This amount is available on WDTF screen on Title I application)
Second Allocation including SINA set-asides

**Step b1** – LEA Allocation – SINA set-asides – set-asides = New District Total to be allocated

<table>
<thead>
<tr>
<th>General Budget</th>
<th>General Carryover</th>
<th>DINA PD (10%)</th>
<th>Choice/SES (20%)</th>
<th>Set-asides</th>
<th>New District Total (to allocate to served buildings)</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>School (“x” if SINA/Delay 3+)</th>
<th>Grade levels</th>
<th>Low-income %</th>
<th># Public low-income</th>
<th># Private low-income</th>
<th>Total # low-income</th>
<th>Building PPA allocation</th>
<th>Building allocation</th>
</tr>
</thead>
</table>

| Higher of PPA or 85% PPA for SINA/Delay 3+ schools only (see Step c below) |

Note: Total of building allocations must be within +/- 3% of New District Total $

**Step c** – Compare PPA allocation in Step b1 and the pre-reservation 85% PPA allocation in Step a3 and allocate the higher of the two figures to SINA/Delay 3 and above schools

**Step d** – Allocate to all other schools using ratable reduction process:

**Step d1**

\[
\text{Total allocation to all served buildings (Step a2) - Total SINA/Delay 3+ building allocations (Step c)} = \text{Amount remaining to be allocated}
\]

**Step d2**

\[
\frac{\text{Total all other building allocations}}{\text{Amount remaining to be allocated (d1)}} = \frac{\text{Total all other building allocations (d2)}}{\% \text{ for new PPA}}
\]

**Step d4** – Enter amount from table above for SINA/Delay 3 schools (Step c). Multiply PPA from Step b1 for ratably reduced building by the percentage determined in Step d3 to arrive at ratably reduced PPA for each building not SINA/Delay 3 and calculate building allocations

This worksheet is also available on the Iowa DE Title I website.

The Title I consultant may request a completed copy of your worksheet.
Districts must allocate Title I funds, appropriated for the current school year, to participating school attendance areas or schools, in rank order, based on the total number of children from low-income families in each area or school.

Please be particularly aware of the following:

- Section 1113 applies to building level allocations—
  A district may allocate Title I, Part A funds to eligible schools that are not currently being served, such as high schools, provided the district allocates funds consistent with section 1113 of ESEA specifically,
  * rank order
  * within district targeting of funds.

- As noted, all Title I requirements apply to the use of Title I, Part A funds, including those requiring equitable services for eligible private school children and their teachers and families.

- LEA Set-aside requirements – professional development, parent involvement, choice transportation, SES.

- Carryover funds must be included in the determination of the per pupil amount.

Section 1116 of NCLB and Section 200.48 of the Title I regulations states that an LEA may not reduce Title I allocations to schools identified for corrective action or restructuring (SINA 3/Delay 3 or higher) by more than 15 percent. The Title I Within District Targeting of Funds (WDTF) screen has been revised to ensure that districts with schools in need of assistance comply with this mandate when determining per pupil allocations for Title I SINA schools. LEAs may satisfy this requirement through one of two methods.

**Method 1: Basic method** – most districts should be able to use the basic method for calculating WDTF.

An LEA may set a floor of 85 percent of its prior-year allocation for any school identified for corrective action or restructuring (SINA 3/Delay 3 or higher). Under this approach, an LEA reserving Title I funds for choice-related transportation and supplemental educational services would not be permitted to reduce its allocation to an affected school below this 85 percent floor.

**Method 2: Districts with tiered allocation system AND SINA 3/Delay 3 or above may want to consider this method.**

In making allocations to schools for a given year, an LEA would calculate two allocations. For the first allocation, the LEA would determine a “pre-reservation” allocation to schools before setting aside funds for choice-related transportation and supplemental educational services (but after any other reservations, such as those made for administrative costs and district-wide activities like professional development and parental involvement). Then, for schools identified for corrective action or restructuring (SINA 3/Delay 3
or higher), the LEA would calculate what 85 percent of those schools’ “pre-reservation” allocation would be. The LEA would determine a second allocation for all schools after reserving funds for choice-related transportation and supplemental educational services. For schools in corrective action and restructuring (SINA 3/Delay 3 or higher), the LEA would then compare this allocation with 85 percent of their “pre-reservation” figure.

Note: The LEA must choose one of the above methods for allocating funds to all schools.

The per-pupil amount (PPA) may be determined after the set-asides are reserved. Only districts serving buildings that are all above 35% poverty can vary the per-pupil amount by using a tiered system among the schools as long as the poorest schools (highest percentage of poverty) receive a greater allocation.

For example: in a tiered system the school district could use:

- for schools greater than 65% - $650
- for schools from 50% - 64% - $600
- for schools from 35% – 49% - $500

Before completing the Within District Targeting of Funds form, be sure you have considered the following:

- An LEA serving only areas or schools at or above 35 percent poverty must allocate funds in rank order, on the basis of the total number of low-income children in each area or school but is not required to allocate 125 percent of the LEA's allocation per low-income child. However, in determining what per-child 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 to attain performance achievement. 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 quality to achieve that purpose.
- Districts must allocate Title I funds to participating school attendance areas or schools, in rank order, based on the total number of children from low-income families in each area or school. A district with an enrollment of less than 1,000 students or with only one school per grade span is not required to allocate funds to areas or schools in rank order.

- A district is not required to allocate the same per-child amount to each area or school. However, the district 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.

- A district that opts to serve schools below 75 percent poverty using grade span groupings may determine different per-child amounts for different grade spans so long as those amounts do not exceed the amount allocated to any area or school above 75 percent poverty. Per-child amounts within grade spans may also vary so long as the district allocates higher per-child amounts to areas or schools with higher poverty rates than it allocates to areas or schools with lower poverty rates.

- Any LEA with a Title I SINA building in year 1 or 2 of identification is required to reserve 10% of the building allocation for professional development. This reservation must be shown on the general budget screen.

---

**Table:**

<table>
<thead>
<tr>
<th>Big. No.</th>
<th>Name of Attendance Center</th>
<th>Grade Levels Housed</th>
<th>Status(*)</th>
<th>Public</th>
<th>Private</th>
<th>Total</th>
<th>Percent</th>
<th>Per Poverty Child Amount ($)</th>
<th>85% of Last Year Per Poverty Child Amount ($)</th>
<th>Public School Allocation (Total X Amount)</th>
<th>School Allocation (Total X Amount)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0456</td>
<td>Mitchell Elementary School</td>
<td>K-05</td>
<td>S</td>
<td>130</td>
<td>18</td>
<td>148</td>
<td>49.3%</td>
<td>0</td>
<td>0</td>
<td>50</td>
<td>50</td>
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<tr>
<td>0481</td>
<td>Sawyer Elementary School</td>
<td>K-05</td>
<td>T</td>
<td>70</td>
<td>15</td>
<td>85</td>
<td>28.3%</td>
<td>0</td>
<td>0</td>
<td>50</td>
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</table>

**Math: SINA-1**

<table>
<thead>
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<th>Big. No.</th>
<th>Name of Attendance Center</th>
<th>Grade Levels Housed</th>
<th>Status(*)</th>
<th>Public</th>
<th>Private</th>
<th>Total</th>
<th>Percent</th>
<th>Per Poverty Child Amount ($)</th>
<th>85% of Last Year Per Poverty Child Amount ($)</th>
<th>Public School Allocation (Total X Amount)</th>
<th>School Allocation (Total X Amount)</th>
</tr>
</thead>
<tbody>
<tr>
<td>0454</td>
<td>Meeker Elementary School</td>
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<td>5</td>
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<td>43</td>
<td>14.3%</td>
<td>0</td>
<td>0</td>
<td>50</td>
<td>50</td>
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<tr>
<td>0440</td>
<td>Fellows Elementary School</td>
<td>K-05</td>
<td>T</td>
<td>41</td>
<td>2</td>
<td>43</td>
<td>14.3%</td>
<td>0</td>
<td>0</td>
<td>50</td>
<td>50</td>
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</tbody>
</table>

**Totals:**

<table>
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<th>Big. No.</th>
<th>Name of Attendance Center</th>
<th>Grade Levels Housed</th>
<th>Status(*)</th>
<th>Public</th>
<th>Private</th>
<th>Total</th>
<th>Percent</th>
<th>Per Poverty Child Amount ($)</th>
<th>85% of Last Year Per Poverty Child Amount ($)</th>
<th>Public School Allocation (Total X Amount)</th>
<th>School Allocation (Total X Amount)</th>
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<td></td>
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<td></td>
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<td>331</td>
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<td>374</td>
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<td></td>
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</tbody>
</table>

**Total Allocation Amount:** 50

---

**General Budget:** $637,414.00

**General Carrying Budget:** $22,852.00

**Set-Aside:** 0

**New District Total:** $650,266

The 'Total Allocation Amount' must be within ±3% of the 'NEW District Total' after 'Set-Aside' is subtracted.
All schools identified on the Selection of Schools form as receiving Title I services (status T or S), will be listed in the table in the Within District Targeting of Funds allocation table.

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

A district that opts to serve schools below 75 percent poverty using grade span groupings may determine different per-pupil amounts for different grade spans so long as those amounts do not exceed the amount allocated to any area or school above 75 percent poverty. Per-pupil amounts within grade spans may also vary so long as the district allocates higher per-pupil amounts to areas or schools with higher poverty rates than it allocates to areas or schools with lower poverty rates.

Districts must ensure that Title I funds have been allocated to participating schools on an equitable basis using a per-poverty-child calculation based on the number of low-income students at each school. Districts shall not determine building allocations based on teacher full-time equivalency (FTE). Eligible private school allocations must be determined using the same low-income measure as was used in the public school calculation.

Controls are included to ensure allocations to schools are made correctly. LEAs will not be able to update/save the screen if there are issues with either of the following: 1) Allocations can only be made to eligible Title I schools. For example, funds can only be allocated to a school if the school poverty rate exceeds the lower of the district-wide poverty rate or 35 percent. 2) When allocating funds to eligible schools in rank order, a higher per-pupil amount must be allocated to school attendance areas with higher percentages of children from low-income families than to schools with lower percentages of poverty. The allocation to schools needs to be large enough to enable the school to operate a program of sufficient size, scope and quality to provide a reasonable assurance the program implemented at the school would successfully meet the intent and purposes of Title I. The Title I consultant will contact the LEA for clarification if a school allocation is less than 50% of the highest amount allocated to a school within the same LEA.

Any building allocation must be an amount that is adequate enough to provide a Title I program of sufficient size and scope to assure quality service in being provided.

\[
\text{Title I Funds} \div (\text{allocation} - \text{set-asides + carryover}) = \frac{\text{number of low-income students in Title I buildings}}{\text{(per-poverty child amount)}}
\]

The per poverty allocation calculated by the district must be completed in the “Per Poverty Child Amount” column. Once the per poverty child amount is completed and the Save button is clicked, the application will automatically calculate the attendance area allocation. Eligible Private School allocations must be determined using the same low-income measure as was used in the public school calculations.

Note: Complete the Statement of Agreement screen(s) for private schools located within the district boundaries.

Points to consider if there is a private school within your local education agency:

- The LEA must negotiate Title I services with eligible private schools.
- The LEA must schedule and hold a timely and meaningful consultation with private school officials.
- Even if the private school declines Title I services, the LEA must complete the Within District Targeting of Funds and Statement of Agreement forms.
- Carryover funds must be included in the determination of the per pupil amount.
- Private schools are not Title I schools.
- The LEA provides Title I services to eligible private school students.
Private schools must be made aware of the required allocation procedure and the amount of funding available. Low-income (F/RL free/reduced lunch eligible) public and private school students residing in the same Title I attendance area generate the same per pupil amount (PPA). These funds must be used only for **instructional services** to eligible private school students. Private schools within an LEA may pool their funds for Title I service. The private school Title I program must be evaluated. The LEA must maintain documents for:

- Timely and meaningful consultation – agenda, notes, emails;
- Declined services -- a signed document or email;
- Evaluation of the private school Title I program.

LEAs receiving allocations of $500,000 or more must reserve and spend 1 percent of the Title I allocation for parent involvement activities, including family literacy and parenting skills. At least 95 percent of the 1 percent reservation must be allocated by formula to Title I funded schools. This reservation needs to be conducted separately from Title I building level allocations. If the district serves private school students, LEAs must correctly calculate and provide for equitable services for private school students regarding parental involvement requirements. The parent involvement requirement can be met either through independent parent involvement activities or in conjunction with the LEA’s activities. If they are done independently, there must be an equitable distribution of funds for these activities. Please respond accordingly on the General Budget form to reflect the situation in your district. **Note:** The district should have on file the background information for this budget detail expenditure, but would not be required to include this on the Title I application itself.

**TIP:** If applicable, the 1 percent reservation must be included in the general budget before approval will be given to your application. To remain in full compliance, the required 1% set-aside for parent involvement must be spent during the current school year.

Once the Within District Targeting of Funds form has been completed, validation edits performed and the **Finish** button clicked, the user should receive the "District Finished" status and the WDTF form moved to the bottom of the Title I Home screen form list.

**TIP:** Do NOT double-click the Finish button.

*Click the Title I Narratives for Targeted Assistance form to complete next.*
Iowa Department of Education

Title I Narratives for Targeted Assistance

Note: The Title I Narratives for Targeted Assistance form must be completed in order for the Title I application to be approved.

For technical assistance on completing the Title I narratives, contact the Title I consultant for your particular AEA.

Once the Title I Narratives for Targeted Assistance form is selected from the Title I program menu, all narratives will automatically appear with space to enter your response.

✔ TIP: You must enter some data in every narrative box in order to be able to save your responses.

All LEAs, regardless of program type, will be required to complete this form in some manner. Note: If you offer a schoolwide program only, the user will be required to indicate the Title I services provided for question 1 and enter “Not applicable” in response to each of the other questions. This will allow the user to click the Finish button and receive the “District Finished” status in order for the Title I application to be completed.

The Title I Narratives for Targeted Assistance form must provide a complete and accurate description of the Title I program to be delivered during the current school year. Please provide a written response to each of the narrative questions.

✔ TIP: Click Save often to avoid losing data.
IDENTIFICATION OF STUDENTS §1116(e)(10) Eligible children are identified by the school as failing, or are at risk of failing, to meet the State's challenging student academic achievement standards on the basis of multiple, educationally related, objective criteria established by the local educational agency and supplemented by the school, except that children from preschool through grade 2 shall be selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures.

1. Title I services provided? Reading ☐ Math ☐

2. Describe how students are selected to receive services, and include how students to be served are prioritized for service if there are more students who are eligible than available resources to serve them.

   A. Reading
   - Grades K-2
   - Grades 3+

   B. Math
   - Grades K-2
   - Grades 3+

3. Outline the Title I services that are provided to students. Reference the use of student data that supports the decision to offer specific Title I programming.

COORDINATION §1115(c)(1)(D), 6115(c)(3)(B) Each school shall coordinate with and support the regular education program, which may include services to assist preschool children in the transition from early childhood programs such as Head Start, or State-run preschool programs to elementary school programs; and coordinate and integrate Federal, State, and local services and programs, including programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

4. Describe the coordination of the Title I program with the regular education program, including as applicable early childhood programs, as well as Federal and State programs, including as applicable violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

PROGRAM EVALUATION §1115(c)(2)(B) Each school shall review, on an ongoing basis, the progress of participating children and revise the targeted assistance program, if necessary, to provide additional assistance to enable such children to meet the State's challenging student academic achievement standards, such as an extended school year, before- and after-school, and summer programs and opportunities, training for teachers regarding how to identify students who need additional assistance, and training for teachers regarding how to implement student academic achievement standards in the classroom. §1118(c)(3) Each school served under this part shall involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs.

5. Describe the process of reviewing the progress of participating children and revising the targeted assistance program to provide additional assistance to enable participating children to meet the State's standards. Describe how parents are included in this process.
After all narratives are completed, the user must click the Finish button and receive the “District Finished” status for the Title I Narratives for Targeted Assistance form before selecting another screen.

✔ TIP: Do NOT double-click the Finish button.

Click the Schoolwide Operating Programs form to complete next.
Iowa Department of Education

**SCHOOLWIDE OPERATING PROGRAMS**

Note: If the local education agency operates a schoolwide program, the Schoolwide Operating Programs form must be completed in order to receive Title I Application approval. ([See special instructions below if your LEA does not have a SWP.](#))

For technical assistance with Schoolwide programs, contact Sandy Johnson at sandra.johnson@iowa.gov or 515/281-3965.

At the heart of the No Child Left Behind Act of 2001 (NCLB) is a section that encourages LEAs to consolidate Federal funds to upgrade the entire educational program of eligible high poverty schools. These schoolwide programs (SWPs) provide the flexibility schools need to assist all students to meet the proficient or advanced levels of local academic achievement standards.

**SCHOOL ELIGIBILITY**

Since the 2002-2003 school year, the schoolwide program option has been available to schools that serve 40 percent or more students from low-income families in their school or attendance area—provided the LEA has adequate funding to operate an effective program.

**SWP BENEFITS**

An eligible school, in consultation with its LEA, makes the decision to become a schoolwide program. Once that decision is made, a school remains a SWP for the remainder of the current legislation or until the decision is reversed. The school maintains its schoolwide status even if the poverty threshold in their attendance area falls below the 40 percent level. Since the decision to “go schoolwide” is a long-term decision, eligible schools often want to consider the benefits of becoming a SWP.

Proponents have suggested that SWPs have the following advantages:
- **SWPs offer more service delivery options for Title I and other Federal program services;**
- **“Title I students” are not singled out;**
- **Student needs can be met more effectively;**
- **Federal program resources are available to all students;**
- **SWPs offer greater staffing flexibility;**
- **Professional development activities can be extended to more staff;**
- **Federal programs can be integrated and coordinated with State and local initiatives.**

**SWP USE OF FUNDS**

LEAs with eligible SWPs may consolidate Title I, Part A funds with most other Federal noncompetitive formula grant program funds. Typically, these other Federal funding sources might include:
- **Title I, Part C**—Education of Migratory Children (except that migrant education funds must first be used, in consultation with migrant parents, to address the needs of migrant children);
- **Title I, Part D, Subpart 2**—Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent or At Risk.
Part (c) of section 1114 makes it clear that SWPs may use their funds to establish or enhance prekindergarten programs for children under six. Schoolwide programs are expected to use the flexibility available to them to integrate services and programs with the aim of upgrading the entire educational program and helping students reach proficient and advanced levels of achievement. Where appropriate, the school may coordinate and integrate parent involvement programs that encourage and support parents in more fully participating in the education of their children.

**LEAs With No SWP**

### Schoolwide Operating Programs

<table>
<thead>
<tr>
<th>2014-2015</th>
<th>Drafted Not Updated</th>
<th>Comments</th>
<th>Finish</th>
<th>Close</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Please Complete Selection of Schools Screen First. If no schoolwide operating programs are available, please click “FINISH” to complete this form.

Note: If your district only offers a Title I program to a targeted student population, click the Finish button to return to the Title I Home screen and move on to the next required form.

**Comparison Of Targeted Assistance And Schoolwide Programs**

**Title I, Part A**  
P.L. 107-110  
No Child Left Behind

Comparing Title I Service Delivery programs for Title I, Part A

### Targeted Assistance Programs (TAP)

- A school is eligible for a targeted assistance program if it serves an eligible Title I school attendance area.
- With a few exceptions, “eligible attendance area” refers to a school attendance area or school in which the percentage of low-income children in the district as a whole, or is at least 35 percent.
- No comparable provisions to the SWP.
- The LEA plan includes a general description of targeted assistance school activities.
- Description of service delivery is indicated through on-line application narratives.

### Schoolwide Programs (SWP)

- A school is eligible if it has a poverty level of at least 40 percent and is receiving Title I funding. However, an eligible school is not required to operate a schoolwide program.
- In order to implement a schoolwide program, an eligible school must first develop a comprehensive plan (in consultations with the LEA and school support team, and with the involvement of the community to be served and the individuals who will carry out the plan) for reforming the total instructional program.
- The law requires a one-year planning period.
- The schoolwide program requires an annual evaluation.
- The written plan will be updated annually and submitted to the State Title I office.
<table>
<thead>
<tr>
<th>Targeted Assistance Programs (TAP)</th>
<th>Schoolwide Programs (SWP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>♦ A targeted assistance program school uses Part A funds to support programs for eligible children, i.e. children that are failing or most at risk of failing to meet local academic standards.</td>
<td>♦ A schoolwide program school uses Part A funds to upgrade the entire educational program of the school. Part A funds can be used to serve all children. ♦ A schoolwide program is not required to identify particular children as eligible to participate in services.</td>
</tr>
<tr>
<td>♦ A targeted assistance school must use Part A funds only to supplement, and in no case supplant, the amount of funds that, in the absence of Part A funds, would be made available from non-federal funds for Title I participants. ♦ Services provided with Title I funds must be in addition to the district-required services. ♦ Title I funds may not be used to replace district funds.</td>
<td>♦ A schoolwide program may use Part A funds only to supplement the amount of funds that would otherwise be available from non-federal sources for the school, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency. ♦ A schoolwide program, however, is not required to provide supplemental services to specific children (i.e., a schoolwide program may use Part A funds to serve any and all children in the school). ♦ Title I funds may not be used to replace district funds.</td>
</tr>
<tr>
<td>♦ Coordination with other program services is expected. Commingling or combining funds is not permitted.</td>
<td>♦ In a schoolwide program school, Part A funds may be combined with other federal, state, and local funds to upgrade the entire educational program at the school.</td>
</tr>
</tbody>
</table>
| ♦ School personnel who are paid with Part A funds may:  
  o Assume limited duties that are assigned to similar personnel who are not paid with Part A funds, including non-instructional duties, as long as the amount of time spent on these duties is the same proportion of total work time as prevails with respect to similar personnel at the same school;  
  ♦ Participate in general professional development and school planning activities. | ♦ No comparable provisions because there are no distinctions between staff who may be paid with Part A funds and other staff. All staff support the schoolwide program. |
| ♦ Paraprofessionals in a Title I Targeted Assistance building must meet NCLB qualifications only if they are paid with Title I funds. ♦ Refer to Public Law 107-110 at educateiowa.gov | ♦ Paraprofessionals employed in a Title I Schoolwide building must meet NCLB qualification requirements regardless of funding (e.g. paraprofessionals paid with district funds, special education funds, or Title I funds must be qualified). ♦ Refer to Public Law 107-110 at educateiowa.gov |
### Targeted Assistance Programs (TAP)

- A targeted assistance school assists participating children in meeting proficient and advanced levels of performance by:
  - Coordinating Part A resources with other resources; and
  - Reviewing, on an ongoing basis, the progress of participating children, and revising the targeted assistance program as necessary to help participating children meet LEA standards.

### Schoolwide Programs (SWP)

- A schoolwide program school helps all children meet local academic standards
- Schoolwide program schools have a great deal of flexibility in coordinating resources. For example, in addition to the provisions stated in the boxes above, the law states that the U.S. Secretary of Education may exempt schoolwide programs from statutory or other regulatory provisions of any other formula or discretionary grant program administered by the Secretary to support schoolwide programs if the intent and purpose of these programs are met.

<table>
<thead>
<tr>
<th>Targeted Assistance Programs (TAP)</th>
<th>Schoolwide Programs (SWP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>♦ Targeted assistance school programs are subject to school improvement provisions (§1116 and §1117).</td>
<td>♦ Schoolwide programs are subject to school improvement provisions (§1116 and §1117).</td>
</tr>
<tr>
<td>♦ Targeted assistance school programs must comply with Part A requirements for parent involvement (§1118).</td>
<td>♦ Schoolwide programs must comply with Part A requirements for parent involvement (§1118). This applies to parents of all children attending the building.</td>
</tr>
<tr>
<td>♦ Targeted assistance school programs must comply with Part A requirements for professional development (§1119).</td>
<td>♦ Schoolwide programs must comply with Part A requirements for professional development (§1119).</td>
</tr>
</tbody>
</table>
**ADDITIONAL CONSIDERATIONS OF SWPs**

The purpose of operating a schoolwide program is to ensure that ALL students benefit from this organizational structure. That does not mean that every child receives individual services; but rather that professional development activities, material purchases, scheduling changes, and personnel decisions can impact the learning opportunities for EVERY child. In order for a schoolwide plan to meet expected guidelines, it MUST reflect programming that is substantially different than the typical targeted assistance program.

**NEWLY ELIGIBLE SCHOOLS**

Newly eligible schools will initiate a one-year schoolwide planning process. Schools wishing to begin the planning process should inform the state Title I office of this intention by phone or e-mail and fill out the “Schoolwide Indication of Planning” screen on the Title I application web site. During the planning year, the school must continue to operate as a Targeted Assistance program. A SWP planning team must be established. The team must include parents, other members of the community to be served, and individuals who will carry out the plan, including teachers, building principals, administrators, and all Title I program administrators, and, if appropriate, pupil services personnel, technical assistance providers, school staff, and students, if the plan relates to a middle or secondary school.

The finished schoolwide plan is in effect for the duration of the current legislation or until a building decision is made to return to targeted assistance status. The SWP plan should be reviewed and revised annually by the schoolwide committee. The plan must be available to parents and the public in an understandable and uniform format, and, to the extent practicable, in a language that parents can understand. Copies of the Schoolwide plan should be on file and available at the district central office and at the building level.

**Note:** Private schools do not have the option of operating schoolwide programs and may only operate as a targeted assistance program. Only eligible students may be served in the private school Title I program.

**EXISTING SCHOOLWIDE PROGRAMS**

All existing schoolwide programs must amend their current schoolwide program plans to include the new requirements of NCLB. The SWP committee should review the expectations of NCLB and amend the entire plan as appropriate with particular attention to the scientifically based research requirements. All ten components must be addressed in the updated plans. Guidance from the US Department of Education emphasizes that the schoolwide plan must be updated annually and include that it is for the 2014-2015 school year and the correct grade levels for its building. A copy of the revised SWP plan must be uploaded to the Title I application Schoolwide Operating Programs form no later than September 15, 2014.

✔ **TIP:** The Selection of Schools form must be “District Finished” status before attempting to complete the Schoolwide Operating Programs form.

Local education agencies that have been approved to receive Title I funds to implement schoolwide programs in one or more Title I buildings, must participate in the completion of the Schoolwide Operating Programs form. To be eligible to be approved to operate as a schoolwide program, the building poverty rate must exceed 40% on the Selection of Schools form and the building staff must have completed a year of planning prior to program implementation. The Title I Application together with the development of each building schoolwide plan and the LEA’s Comprehensive School Improvement Plan encompasses the basic requirements of the Title I legislation connected with the LEA’s schoolwide program.
Note: An updated copy of the current building schoolwide plan must be annually uploaded to the Title I Application before Title I funding will be released.

**SWP Plans (The Written Document)**

Any eligible school that desires to operate a SWP must develop (or amend) a comprehensive plan for reforming the total instructional program in the school. Schoolwide guidance from the U.S. Department of Education (www2.ed.gov/policy/elsec/guid/designingswpguid.doc) emphasizes that the schoolwide plan must be updated annually and gives more focus to evaluation. In particular, it states that the initial stages of schoolwide planning – needs assessment and preparation of the plan – involve setting the stage for later evaluation. In other words, when preparing a needs assessment, a school or LEA should identify how it can establish benchmarks for a plan, and when preparing a plan, it should build in a feedback loop that uses evaluation results to improve implementation. The guidance also highlights the importance of the following:

- Establishing annual priorities in the planning section. Don’t tackle everything in the needs assessment at once; prioritize and address the top three needs. The plan should be comprehensive, embracing all grades and all subjects.
- The criteria for success can be an increase in achievement or an increase in activities that lead to student achievement, such as parental involvement or professional development of highly qualified teachers.
- Having two questions for evaluation: Is it being implemented correctly? and, Is the plan effective?
- Using outside reviewers for evaluation – if not every year, perhaps every two years.

All schoolwide buildings must annually submit a revised schoolwide plan to the Iowa Department of Education. Close attention should be paid to the inclusion of all components in the updated plans. This plan must include:

1. **The ten components** outlined and how they will be implemented;
2. A list of related State and Federal programs to be included in the SWP;
3. A description of how the school will use its consolidated resources to implement the SWP components;
4. A description of how the school will provide individual student assessment results to parents in a language and format the parents can understand;
5. A description of the annual evaluation process for SWP.
6. A list of the SWP committee members.
7. **The completed** Title I SWP Template.

All Iowa Title I schoolwide programs must upload their updated plans for 2014-2015 to the Title I Application Schoolwide Operating Programs form. Each new/revised plan must include that it is addressing the 2014-2015 school year and the correct grade levels for its building. Districts with more than one schoolwide program building **must** submit a plan for each building. Each schoolwide program building plan must be specific to that building. Title I application approval is conditional upon the receipt of this plan.

Note: Submission of the schoolwide plan does not replace the required participation in the development of the LEA’s Comprehensive School Improvement Plan (C-Plan).
The user will click the Schoolwide Plan Template button or use the following link https://www.educateiowa.gov/documents/title-i/2013/05/schoolwide-plan-checklist to download a document in Word format from the Iowa Department of Education web site to complete.

**TITLE I SWP COMPONENTS**

The district must review the Title I Schoolwide Plan/s to ensure that all ten components and requirements have been met. The LEA is responsible for approval of each schoolwide building plan. The user should upload the completed plan for each Title I schoolwide building at the appropriate place on this form. Schoolwide Plans are due September 15 as part of the Title I application process.

<table>
<thead>
<tr>
<th>Date</th>
<th>District Name</th>
<th>School Name</th>
<th>Building Grades</th>
<th>Building Principal</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Schoolwide Program Planning &amp; Review Team (Required)</th>
<th>List members’ names and titles. This committee must include parent representation for this specific building.</th>
</tr>
</thead>
</table>

This team is responsible for planning, developing, revising, and evaluating the schoolwide plan. The team does not need to be named “Schoolwide Team,” but may be a part of an existing leadership or building team. Representation should include building administration, teaching staff, and parents.

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Example: Pat Edwards</td>
<td>Third Grade Teacher</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Dates this team will meet during 2014-2016</th>
<th>(Example: Sept 20, Nov 13, Feb 12, May 10)</th>
</tr>
</thead>
</table>

Insert the above required information as the district/building section for this schoolwide building here.

**§1114(b) TEN COMPONENTS OF A SCHOOLWIDE PROGRAM**

All Schoolwide Plans must include the following ten components:
## Component 1

**§1114(b)(1)(A) A COMPREHENSIVE NEEDS ASSESSMENT of the entire school**

- Provide a brief description of the school, attendance area, and surrounding community.
- Describe how the comprehensive needs assessment was conducted in an inclusive manner so it reaches all members of the school community (including regular education, special education, talented and gifted, homeless, migrant, Limited English Proficient, as well as low-achieving students), paying particular attention to the needs of educationally disadvantaged children.
- Summarize strengths and needs of the school’s current educational program.
- As a result of this current comprehensive needs assessment, list by priority the specific need areas and objectives to be addressed this year of the school-wide plan.

Insert the Comprehensive Needs Assessment for this schoolwide building here.

## Component 2

**§1114(b)(1)(B) SCHOOLWIDE REFORM STRATEGIES**

- Provide opportunities for all children to meet proficient and advanced levels of student academic achievement.
- Use effective methods and instructional strategies that are based on scientifically based research that:
  - strengthen the core academic program
  - increase the amount of learning time (extended school year, before- and after-school and summer programs and opportunities)
  - help provide an enriched and accelerated curriculum
  - include strategies for serving underserved populations
  - include strategies to address the needs of all children in the school, but particularly low-achieving children and those at risk of not meeting state standards;
  - address how the school will determine if those needs of the children have been met
  - are consistent with and are designed to implement state/local improvement plans.

Insert the Schoolwide reform strategies section for this schoolwide building here.

## Component 3

**§1114(b)(1)(C) INSTRUCTION BY HIGHLY QUALIFIED TEACHERS in all core content area classes**

- Describe how the school will ENSURE a highly qualified professional staff is employed at the school and how the staff will be employed in a manner that best enhances this schoolwide plan.
- Ensure that all paraprofessionals (regardless of funding source) employed at this school meet the NCLB qualification. Documentation must be kept on file at the school.

The paraprofessional requirements outlined in NCLB are applicable to ALL paraprofessionals employed in a school operating a schoolwide program regardless of funding sources (e.g. paraprofessionals paid with special education funds, general funds and/or Title I funds). Refer to Public Law 107-110, which can be found at educateiowa.gov. There is no grace period for acquiring the qualifications. All paraprofessionals must be highly qualified upon employment in a Title I schoolwide building.

Insert highly qualified teachers and paraprofessionals section for this schoolwide building here.

## Component 4

**§1114(b)(1)(D) HIGH-QUALITY AND ONGOING PROFESSIONAL DEVELOPMENT for teachers, principals, and paraprofessionals**

- Describe the process of determining the professional development needs of all principals, teachers, paraprofessionals, and others as appropriate in this Title I schoolwide program.
- Describe how the school will implement high quality and ongoing professional development.

Insert professional development section for this schoolwide building here.
The Title I parent involvement requirements are the same for schoolwide programs and targeted assistance programs. However, in a schoolwide program, the parent involvement requirements pertain to ALL students in the school. This includes the Parent-School Compact, the Title I Parent Involvement Policy, and the annual parent meeting. SWP plans should reflect how parents provide input into the planning, implementation and review of the program. An annual evaluation of the Title I Parent Involvement Program is required.

Insert parent involvement strategies section for this Schoolwide building here.

The Title I parent involvement requirements are the same for schoolwide programs and targeted assistance programs. However, in a schoolwide program, the parent involvement requirements pertain to ALL students in the school. This includes the Parent-School Compact, the Title I Parent Involvement Policy, and the annual parent meeting. SWP plans should reflect how parents provide input into the planning, implementation and review of the program. An annual evaluation of the Title I Parent Involvement Program is required.

Insert transition plans section for this Schoolwide building here.

The Title I parent involvement requirements are the same for schoolwide programs and targeted assistance programs. However, in a schoolwide program, the parent involvement requirements pertain to ALL students in the school. This includes the Parent-School Compact, the Title I Parent Involvement Policy, and the annual parent meeting. SWP plans should reflect how parents provide input into the planning, implementation and review of the program. An annual evaluation of the Title I Parent Involvement Program is required.

Insert teacher involvement measures section for this Schoolwide building here.
Insert plans for assisting students section for this Schoolwide building here.

### Component 9

**$\text{1114(b)(1)(i)}$ PLANS FOR ASSISTING STUDENTS WHO EXPERIENCE DIFFICULTY MASTERING THE PROFICIENT OR ADVANCED LEVELS OF ACADEMIC ACHIEVEMENT**

- Describe the intensive assistance programs and activities at the school level that ensure all students having difficulty mastering proficient and advanced levels of the academic achievement are provided with effective, timely additional assistance.
- Describe the identification, instruction and monitoring processes used.
- Describe how the school will provide individual student assessment results, including the interpretation of those results, to parents of the student.

Insert plans for coordination and integration section for this Schoolwide building here.

### Component 10

**$\text{1114(b)(1)(i)}$ PLANS FOR COORDINATION AND INTEGRATION of federal, state, and local services and programs**

- May include programs under NCLB, nutrition programs, housing programs, Head Start, adult education, and technical training programs.
- **Must specifically address** the educational needs of and coordination with other services for **homeless students**, such as housing programs (ESEA, $\text{1114(b)(1)(i)}$).

Each schoolwide program building must have its own SWP Planning/Evaluation team. In addition to the ten required components, the schoolwide plan must include the following with respect to the annual evaluation process for schoolwide programs:

- The school must evaluate annually the outcomes and the plan’s implementation to determine whether
  - the academic achievement of all students, and particularly of the low-achieving students, improved;
  - the goals and objectives contained in the plan were achieved; and
  - if the plan is still appropriate as written.
- Describe how the results of annual evaluation of the effectiveness of this schoolwide plan will be used to make revisions to the plan to ensure continuous improvement of students in this schoolwide program.

Insert plans for annual evaluation section for this Schoolwide building here.

Once the schoolwide plan is complete the user should save the document within their computer files in Word or PDF format.
The user is required to complete the Schoolwide Operating Programs form of the Title I application if the LEA has one or more Title I buildings that have been approved to operate as a schoolwide program. To be eligible to implement a schoolwide program in the current year, the building low-income must be at least 40% and the building staff must have participated in a year of planning prior to program implementation.

Title I SWP buildings that were identified as schoolwide (status = S) on the Selection of Schools form, will appear automatically in the above table of the Schoolwide Operating Programs form. For each SWP building, the user should enter the school year in which initial schoolwide planning took place and the school year when the initial SWP began. The user will click the Upload button to browse the LEA computer files and attach the copy of the building Schoolwide plan. The user must perform these same steps for each building offering a Title I schoolwide program during the current school year. **Note: This form may only be used after a building has been through a year of planning.**

**Note:** The Schoolwide Operating Programs form together with the LEA’s Title I Application and the LEA’s C-Plan encompasses the basic requirements of the Title I legislation connected with schoolwide programs including assurances, lobbying and debarment, and the schoolwide program plan.

Once the Schoolwide Operating Programs form has been completed, SWP plans uploaded and the Finish button clicked, the user should receive the “District Finished” status and the Schoolwide Operating Programs form moved to the bottom of the Title I Home screen form list.

✔️ **TIP:** If your LEA is planning to initiate a schoolwide program, you must contact the State Title I office, complete the Schoolwide Indication of Planning form and operate as a targeted assistance program in the current school year.

*Click Upload Parent Policy and Compact form to be completed next.*
Note: The Parent Involvement Policy and Parent-Student Compact must be attached to the Title I application in order to receive approval and Title I funding.

For technical assistance with uploading the parent involvement policy or parent-student compact, contact the Title I consultant for your particular AEA.

When the user clicks the Upload Parent Policy button, you will be able to browse the district files to locate and upload a copy of the local education agency Parent Involvement Policy to the Title I application. Please ensure that this document shows a date for the current school year and is saved in Word or PDF format. Click the Save button.

When the user clicks the Upload Compact button, you will be able to browse the district files to locate and upload a copy of the local education agency Parent-Student Compact to the Title I application. Please ensure that this document shows a date for the current school year and is saved in Word or PDF format. Click the Save button.

Note: Compacts and policies for multiple buildings may be uploaded; but both of these documents must be attached to the Title I application before the district will be allowed to submit the application for processing.

Once both of these required documents have been attached to the Title I application, the user may click Finish and the user will be returned to the Title I Home screen and the Parent Policy and Compact form should reflect the “District Finished” status.

✔ TIP: Do NOT double-click the Finish button.

Click the Statement of Agreement form to be completed next.

TITLE I PARENTAL INVOLVEMENT

Section 1118, of the No Child Left Behind Act of 2001 (NCLB) requires each district and school with a Title I program to have a parent involvement policy that is jointly developed, agreed upon, and distributed to parents of participating children. This policy must be on file in the district, but need not be approved by the school board. The parent involvement policy must be reviewed annually and plans for its review must be included in the Comprehensive School Improvement Plan (CSIP), which is part of C-Plan. An annual Title I parent meeting must be held at a convenient time. A parent compact must be provided to every parent in a schoolwide program building and to Title I parents in
targeted assistance program schools. The law does not require a parent signature; however, effort should be made to encourage parents to sign the compact. Although sample documents are included in this document, schools are encouraged to create compacts that are useful to them and reflect the beliefs of the school and community.

For the 2014-2015 school year, local parent policies and compacts must be reviewed, updated and uploaded to the Title I application for review. The parent involvement policy must incorporate all required components, include parents in the review process, and be labeled “Reviewed and Updated for the 2014-2015 School Year.” The parent involvement policy and parent-school compact must be submitted no later than September 15 as part of the Title I application process. Final approval of the local Title I application is conditional upon the receipt of these documents.

Title I funds may be used for activities associated with Parent Involvement. LEAs receiving allocations of $500,000 or more must reserve and spend 1 percent of the allocation for parent involvement activities, including family literacy and parenting skills. At least 95 percent of the 1 percent reservation must be allocated by formula to Title I funded schools. This reservation needs to be conducted separately from Title I building level allocations. If the district serves private school students, LEAs must correctly calculate and provide for equitable services for private school students regarding parental involvement requirements. The parent involvement requirement can be met either through independent parent involvement activities or in conjunction with the LEA’s activities. If they are done independently, there must be an equitable distribution of funds for these activities. The LEA is required to document on the General Budget form expenditure totals to reflect the situation in their district. If applicable, the 1 percent reservation must be included in the general budget before approval will be given to the district application. To remain in full compliance, the required 1% set-aside for parent involvement must be spent during the current school year. Note: The district should have on file the background information for this budget detail expenditure, but is not required to include this on the Title I application itself. For example:

In participating public school attendance areas:

<table>
<thead>
<tr>
<th>No. of private school children from low-income families</th>
<th>Total no. of children from low-income families</th>
<th>Proportion of Reservation</th>
</tr>
</thead>
<tbody>
<tr>
<td>___________________________</td>
<td>___________________________</td>
<td>_________________________</td>
</tr>
<tr>
<td>Proportion of Reservation</td>
<td>Reservation for Equitable Services</td>
<td></td>
</tr>
<tr>
<td>___________________________</td>
<td>$_________________________</td>
<td>$_________________________</td>
</tr>
</tbody>
</table>

✔️ TIP: If applicable, the 1 percent reservation must be included in the general budget before approval will be given to your application. To remain in full compliance, the required 1% set-aside for parent involvement must be spent during the current school year.

In general, parent involvement refers to strategies intended to increase the involvement and contributions, in both school-based and home-based settings, of parents that are designed to support classroom instruction and increase student achievement. Title I places considerable emphasis on parent involvement. Section 1118 of the Title I statute contains many provisions concerning an LEA’s responsibilities for carrying out parent involvement activities. Research shows that parental involvement in the education of the child is a critical factor in improving academic achievement. If a child is to attain and maintain grade level proficiency and achieve high academic standards, parents must support their child’s learning.

Parent involvement is more than just surveying parents or bringing them together for a meeting to listen—they also must be given opportunities for meaningful participation and active involvement. Parent involvement activities must be designed and implemented to meet the needs of the parents—not the needs of the local education agency. Parents should receive training and materials to help them work with their child to improve academic achievement.
Examples of mechanisms that can encourage parental involvement include the following:
- Establishment of organized parent groups.
- Holding public meetings involving parents to review school performance and help develop school improvement plans.
- Using surveys to gauge parent satisfaction and support for the school.
- Implementing complaint procedures for parents.
- Coordinating with local social and health service providers to help meet family needs.
- Parent education classes (including GED, adult literacy, and ESL programs).

IowaParents.org, a joint effort between the School Administrators of Iowa (SAI), the Iowa Department of Education (DE), and Area Education Agency 267 (AEA 267), provides Iowa Statewide Parent Information Resource Center (Iowa PIRC) to promote student success. This website (http://www.iowaparents.org) is designed to provide information and support to a wide-range of parents and educators throughout Iowa.

Local education agencies may find guidance on meeting the parent involvement requirements under Title I Part A on the DE web site at http://educateiowa.gov.

### Key Title I, Part A Parental Notice Requirements

<table>
<thead>
<tr>
<th>Key Title I, Part A Parental Notice Requirements*</th>
<th>When</th>
<th>By whom</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Annual report cards</strong> (SEAs and LEAs disseminate to parents, schools, and the public, an annual report card with aggregate information, including student achievement (disaggregated by category), graduation rates, performance of LEAs, teacher qualifications, and other required information). [Section 1111(h)(1) and (2), ESEA.] Guidance, B-5 (SEA) and C-7 (LEA).</td>
<td>Annually</td>
<td>✓ ✓ ✓</td>
</tr>
<tr>
<td><strong>Individual student assessment reports</strong> (SEAs, in consultation with LEAs, provide to parents, teachers, and principals of students in all schools individual student interpretive, descriptive, and diagnostic reports, which allow specific academic needs to be understood and addressed, and include information on the student’s achievement on academic assessments aligned with State academic achievement standards). [Section 1111(b)(3)(C)(xii), ESEA.]</td>
<td>As soon as practicable after the assessment is given</td>
<td>✓</td>
</tr>
<tr>
<td><strong>Progress review</strong> (SEAs disseminate to parents, LEAs, teachers and other staff, students, and the community the results of the SEA’s yearly progress review of each LEA (including progress in carrying out parental involvement responsibilities); LEAs disseminate to parents, teachers, principals, schools, and the community the results of the LEA’s yearly progress review of each school). [Section</td>
<td>Annually</td>
<td>✓ ✓ ✓</td>
</tr>
<tr>
<td>Key Title I, Part A Parental Notice Requirements*</td>
<td>When</td>
<td>By whom</td>
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<tr>
<td>------------------------------------------------</td>
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<tr>
<td>1116(a)(1)(C), (c)(1)(B) and (c)(6), ESEA.</td>
<td>Guidance, B-7 (SEA) and C-20 (LEA)</td>
<td>SEAs</td>
</tr>
<tr>
<td>LEAs identified for improvement (SEAs notify parents of children enrolled in schools in the LEA that the LEA has been identified for improvement and other information). [Section 1116(c)(1) and (6), ESEA.] Guidance, B-8.</td>
<td>Promptly upon identification</td>
<td>✓</td>
</tr>
<tr>
<td>LEAs identified for corrective action (SEAs disseminate to parents and public information on corrective actions taken by SEA). [Section 1116(c)(10)(E), ESEA.] Guidance, B-9.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Schools identified for school improvement, corrective action, or restructuring (LEAs provide to parents of each student an explanation of what the identification means, how the schools compare to others, reasons for the identification, the LEA’s and school’s response, how parents can become involved, any corrective action taken, the parental choice and supplemental services options as applicable, restructuring, and other information). [Section 1116(b)(6), 7(E), and 8(C), ESEA, and 34 CFR 200.37(5).] Guidance, C-21, C-22, and C-23.</td>
<td>Promptly following identification</td>
<td></td>
</tr>
<tr>
<td>Schools identified for corrective action – supplemental services notice (LEAs serving schools that fail to make adequate yearly progress (AYP) by the end of the first full school year after being identified for improvement provide notice to parents of the availability of supplemental services, the identity of the providers, a description of the services, and other information). [Section 1116(e)(2), ESEA.]</td>
<td>Annually (at a minimum)</td>
<td></td>
</tr>
<tr>
<td>Schools identified for restructuring (LEAs serving schools that fail to make AYP after 1 full school year of corrective action provide prompt notice to teachers and parents and provide opportunity to comment and participate in preparing a restructuring plan). [Section 1116(b)(8)(C), ESEA.] Guidance, C-27.</td>
<td>Promptly after school misses AYP following 1 full school year of being in corrective action</td>
<td></td>
</tr>
<tr>
<td>Written parental involvement policies (LEAs notify parents of Title I, Part A children of district-level written parental involvement policy; schools notify parents and community of school’s written parental involvement policy). [Section 1118(a)(2) and (b)(1), ESEA.] Guidance, C-3 and C–4 (LEA), and D-1 (school).</td>
<td>Determined by LEA</td>
<td>✓</td>
</tr>
<tr>
<td>Key Title I, Part A</td>
<td>When</td>
<td>By whom</td>
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<td>-------------------</td>
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<tr>
<td>Parental Notice Requirements*</td>
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<tr>
<td><strong>Written SEA complaint procedures</strong> (LEAs disseminate free of charge to parents of students, and to appropriate private school officials or representatives, adequate information about the SEA’s written complaint procedures for resolving issues of violation(s) of a Federal statute or regulation that applies to Title I, Part A programs). [34 CFR Section 200.11(d).]</td>
<td>Determined by SEA</td>
<td>✔</td>
</tr>
<tr>
<td><strong>Parents’ right to know – teacher and paraprofessional qualifications</strong> (LEAs inform parents of Title I, Part A students that may request, and the LEA then will provide, certain information on the professional qualifications of the student’s classroom teachers and paraprofessionals providing services to the child). [Section 1111(h)(6)(A), ESEA.] Guidance, C-6.</td>
<td>Annually, at beginning of school year</td>
<td>✔</td>
</tr>
<tr>
<td><strong>Parents’ right to know – student achievement</strong> (schools provide to each individual parent, information on the achievement level expectations and the level of achievement of the parent’s child in each of the State academic assessments). [Section 1111(h)(6)(B)(i), ESEA.] Guidance, D-10. NOTE: This requirement may be covered by the SEA’s individual student assessment report indicated above.</td>
<td>Determined by LEA.</td>
<td>✔</td>
</tr>
<tr>
<td><strong>Parents’ right to know - non-highly qualified teachers</strong> (schools provide to each individual parent timely notice that the parent’s child has been assigned, or taught for 4 or more consecutive weeks by, a teacher who is not highly qualified). [Section 1111(h)(6)(B)(ii), ESEA.] Guidance, D-3.</td>
<td>Timely</td>
<td>✔</td>
</tr>
<tr>
<td><strong>Title I, Part A meeting</strong> (schools invite parents to an informational meeting to inform them about the school’s participation in Title I, Part A programs and explain the requirements and their right to be involved). [Section 1118(c)(1) and (2), ESEA.] Guidance, D-5.</td>
<td>Annual</td>
<td>✔</td>
</tr>
<tr>
<td><strong>Title I, Part A information</strong> (schools provide to parents of participating children specific information about Title I, Part A programs, and opportunity to request regular meetings). [Section 1118(c)(4), ESEA.] Guidance, D-6.</td>
<td>Timely</td>
<td>✔</td>
</tr>
<tr>
<td><strong>Limited English proficient students - general</strong> (LEAs implement effective outreach to inform parents of limited English proficient children of how those parents can be involved in their children’s education and active participants in helping their children attain English proficiency, high achievement levels in core academic subjects, and meet State standards, including notice of opportunities for and</td>
<td>Regular</td>
<td>✔</td>
</tr>
<tr>
<td>Key Title I, Part A</td>
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<tr>
<td>Parental Notice Requirements*</td>
<td></td>
<td></td>
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<tr>
<td>When</td>
<td>By whom</td>
<td></td>
</tr>
<tr>
<td>SEAs</td>
<td>LEAs</td>
<td>Schools</td>
</tr>
<tr>
<td>holding regular meetings). [Section 1112(g)(4), ESEA] Guidance, C-9.</td>
<td>(meetings)</td>
<td></td>
</tr>
<tr>
<td><strong>Limited English proficient students - language instruction educational programs</strong> (LEAs inform parents of limited English proficient children identified for participation or participating in a Title I, Part A-funded language instruction educational program under Title III of the ESEA, of: reasons for the identification, level of English proficiency, methods of instruction, how the program will help the child, and other information; LEAs inform parents of a child with a disability how the language instruction educational program meets the objectives of the child’s individualized educational program (IEP)). [Section 1112(g)(1)(A) and (3), ESEA.] Guidance, C-9 and C-10.</td>
<td>Annually, not later than 30 days after the beginning of school year for children ID’d before beginning of year; otherwise within first 2 weeks of child being placed in language instruction program.</td>
<td>✓</td>
</tr>
<tr>
<td>Key Title I, Part A</td>
<td>Parental Notice Requirements*</td>
<td></td>
</tr>
<tr>
<td>---------------------</td>
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</tbody>
</table>
|                     | **Limited English proficient students - insufficient language instruction educational programs** (eligible entity using Title I, Part A funds for a language instruction educational program under Title III of the ESEA provides separate notice to parents of a child identified for participation in, or participating in, the program to inform them that the program has not made progress on the annual measurable achievement objectives).  
[Section 1112(g)(1)(B), ESEA.] |
|                     | **Students with the most significant cognitive disabilities**  
(a State that measures the achievement of students with the most significant cognitive disabilities based on alternate achievement standards must ensure that parents are informed that their child’s achievement will be based on these alternate standards. The SEA must also ensure that parents are informed of the actual achievement levels of these students, particularly in the case of an LEA that exceeds the 1% cap on counting proficient scores for AYP).  
[Section 1111(b)(3), ESEA, and 34 CFR Section 200.6(a)(2)(iii)(A)(2), 200.13(c)(4)(v)] |
| When                | By whom                  |
|                     | SEAs | LEAs | Schools |
| Not later than 30 days after the failure occurs | ✔️   |     | ✔️ (or other eligible entity) |
| Determined by SEA  | ✔️   |     | ✔️     |
Parents Right to Know

Notification to Parents Concerning Highly Qualified Teachers and Paraprofessionals.

Part 1
All districts receiving Title I funds must notify parents of all students in Title I funded schools that they may request information on their child’s teacher’s qualifications.

Information, at a minimum, must be provided that addresses the licensing requirements for the position held by the teacher, the licensure status, and educational background of the teacher.

The availability of this information must be included in a formal notification through a newsletter, note to parents, etc. Suggested wording for the notification is included on the next page.

If the child also receives services from an instructional paraprofessional, the parents should be notified and informed of the paraprofessional’s qualifications upon

Part 2
Parents must be notified if their child has been assigned, or will be taught for four or more consecutive weeks by a teacher who is not highly qualified.

The school must provide a statement to parents (in a newsletter or other form of communication) that ensures notification will occur should a child be taught for four or more consecutive weeks by a teacher who is not highly qualified.

When any child is provided a substitute teacher for four consecutive weeks in a school that receives Title I funds and the substitute does not meet the highly qualified teacher definition, the school must notify parents of this situation. Sample wording is provided on the following page.

The superintendent must notify the Iowa Department of Education of all non-highly qualified teachers, send a notice home to parents of students in that teacher’s class and send a copy of that notice to Isbelia Arzola; isbelia.arzola@iowa.gov.

Information about licensure of Iowa teachers can be found at http://www.state.ia.us/boee/.
No Child Left Behind Requirement
Parents'/Guardians' Rights Notification

Parents/Guardians in the _______________________ Community School District have the right to learn about the following qualifications of their child's teacher: state licensure requirements for the grade level and content areas taught, the current licensing status of your child's teacher, and baccalaureate/graduate certification/degree. You may also request the qualifications of an instructional paraprofessional who serves your student in a Title I program or if your school operates a schoolwide Title I program. Parents/Guardians may request this information from the Office of the Superintendent by calling ______________________ or by sending a letter of request to the Office of the Superintendent, Street Address, State, Zip.

The _______________________ Community School District ensures that parents will be notified in writing if their child has been assigned, or has been taught by a teacher for four or more consecutive weeks by a teacher who is not considered highly qualified.
Date

Dear Parents and Guardians:

The federal No Child Left Behind Act of 2001 (NCLB) requires all schools to notify parents or guardians after a class has been taught for four consecutive weeks by a teacher who is not considered —highly qualified— for that specific subject area. While there are a variety of ways in which a teacher can demonstrate that he or she is —highly qualified— in a given subject, the requirement is considerably more difficult to meet for a teacher who is responsible for teaching several core subject areas.

The purpose of this letter is to inform you that Mr./Mrs. __________________ is not considered —highly qualified— under NCLB in one or more subject areas being taught to your child.

Please be assured that this does not mean that this teacher is not qualified for this assignment. Mr./Mrs. __________________ does meet the state requirements for this position. Given his/her professional preparation and experience, we believe that your child is receiving a high-quality education in his/her class. (Additional information may be added at the districts discretion.)

If you have any concerns regarding this information, you have a right as a parent to review the qualifications of your child’s teachers. Please contact _________________ at _______________ if you have any questions.

Sincerely,

Superintendent
Title I Parent Involvement Policy Self-Checklist

Title I Parent Involvement requires each Title I school to develop a written parental involvement policy that describes the means for carrying out the requirements of Section 1118. The School must ensure that information related to school and parent programs, meetings and other activities are sent to the parents of Title I children in a format and in a language the parents can understand.

The policy must be:
- Developed jointly with and agreed on by parents of Title I children;
- Written in an understandable format and provided in a language parents can understand;
- Distributed to all parents of Title I children; and
- Made available to the local community and updated periodically to meet the changing needs of parents and the school.

<table>
<thead>
<tr>
<th>CHECKLIST OF REQUIRED COMPONENTS</th>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>1) The Policy describes how parents will be involved in the planning, review and improvement of the school's Parent Involvement Policy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2) The Policy states that an annual meeting will be held to inform parents of the school's participation in the Title I program and to explain the requirements of the program and their right to be involved.</td>
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<tr>
<td>3.) The Policy states that parent meetings, including parent conferences, will be held at different times during the day.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4) The Policy states that Title I funds may be used to pay reasonable and necessary expenses associated with parent involvement activities, including transportation, childcare, or home visit expenses to enable parents to participate in school-related meetings and training sessions.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5) The Policy describes how parents will be involved in the planning, review, and improvement of the school's Title I program.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6) The Policy describes how the school involves parents in the joint development of the Schoolwide Program Plan under Section 1114. Applies only to Title I schools operating a Schoolwide Program.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7) The Policy describes how the school involves parents in the joint development of the School Improvement Plan under Section 1116. Applies only to Title I schools identified for School Improvement.</td>
<td></td>
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</tr>
<tr>
<td>8) The Policy describes how the school will provide parents of participating children with timely information about the Title I program.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9) The Policy describes how the school will provide parents of participating children with a description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10) The Policy describes how the school will provide assistance to parents in understanding the State's academic content standards and student achievement standards, local academic assessments and how to monitor a child's progress and work with teachers to improve the achievement of their children.</td>
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<td></td>
</tr>
</tbody>
</table>
11) The Policy states that the school will provide, if requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible.

12) The Policy states that a school-parent compact was jointly developed with parents and the compact outlines how parents, the entire school staff and students will share in the responsibility for improved student achievement.

13) The Policy describes how the school provides materials and training to help parents to work with their children to improve their child's achievement, such as literacy training and using technology, as appropriate, to foster parent involvement.

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**Sample Parent Involvement Policy**

**2014-2015**

_______________ Community School District

It is the policy of ______________ Community Schools that parents of participating children shall have the opportunity to be involved jointly in the development of the district plan and in the district's review process for the purpose of school improvement. Recognizing that parental involvement is the key to academic achievement, we seek to involve parents in an effective home-school partnership that will provide the best possible education for our students. The district provides coordination, technical assistance and other supports necessary to aid in the planning and implementation of parent involvement activities. The district encourages parent involvement and supports this partnership through providing information about standards and assessments; providing training and materials for parents to help their children; educating school personnel about involving parents and the value of parent contributions; and developing roles for community organizations and businesses to work with parents and schools.

1. This jointly developed and agreed upon written policy is distributed to parents of participating Title I children and all parents in schoolwide buildings through the Parent Handbook which is distributed to every family at the time of registration.

2. Two annual meetings are held, for all parents of participating children, both public and private. Additional meetings with flexible times shall be held throughout the year and be determined by parent suggestions. All _________ elementary buildings will hold two annual meetings, one in the fall and one in the spring. Notification will be sent in the building newsletter.

3. Parents are given assistance in understanding the Title I requirements, standards, and assessments through the annual meetings and parent-teacher conferences.

4. Parents receive an explanation of the school's performance profile, the forms of academic assessment used to measure student progress, and the expected proficiency levels in the annual progress report distributed to all stockholders in the spring of the year, through individual reports given to parents at conference time, and through report cards.
5. In targeted assistance buildings parents are informed of and involved with their child's participation in the Title I program. They also are informed about the curriculum, instructional objectives, and methods used in the program. This information is delivered through newsletters, conferences and the annual meetings.

6. Parent recommendations are encouraged and responded to in a timely manner. Verbal or written responses will be given for all recommendations.

7. Parents will be involved with the planning, review, and improvement of the schoolwide programs. The vehicle used will be the School Improvement Advisory Committee (SIAC). If the schoolwide program is not satisfactory to the parents of participating children, they may submit comments to the SIAC.

8. A jointly developed school/parent compact outlines how parents, the entire school staff, and students all share responsibility for improved student achievement. The compact also describes the means by which the school and parents will build and develop a partnership to help children achieve our local high standards. It is distributed in the parent handbook and is reviewed at the annual meetings.

9. The Title I program provides opportunities for parents to become partners with the school in promoting the education of their children both at home and at school. Parents are given help monitoring their student's progress and provided assistance on how to participate in decisions related to their student's education. The school also provides other reasonable support for parental involvement activities as requested by parents. Parents are encouraged to participate as volunteers in the school setting. Individual conferences will also be held upon request. A reading library, which contains reports on educational issues, books, and videos, are available to parents for check out at the __________ Elementary building.

10. The school continues to coordinate and integrate, to the extent feasible and appropriate, the parent involvement policy and other programs and activities within the district. Transitional information for students moving from fifth grade to sixth grade will be provided to parents at __________ Elementary at the annual spring meeting.

11. An annual evaluation of this parental involvement policy shall be conducted to determine its effectiveness. Findings will be used to design strategies for school improvement and revision of policies. The annual spring meetings will serve as the site for the discussions of program adjustments.

Providing all __________ Community School District's children with equal access to quality education is of primary purpose. It is crucial that all partners (students, parents, educators, and communities) have the opportunity to provide input and offer resources to meet this purpose. As these partnerships are mutually beneficial, developing cooperative efforts will ensure improved academic achievement for all students.
DESCRIPTION OF HOW DISTRICT WILL IMPLEMENT REQUIRED
DISTRICTWIDE PARENTAL INVOLVEMENT POLICY COMPONENTS
(Sample Template)

[Note: The Districtwide Parental Involvement Policy must include a description of how
the district will implement or accomplish each of the following components. [Section
1118(a)(2), ESEA.] This is a “sample template” as there is no required format for these
descriptions. However, regardless of the format the district chooses to use, a
description of each of the following components below must be included in order to
satisfy statutory requirements.]

1. The _____name of school district___________ will take the following actions to
   involve parents in the joint development of its districtwide parental involvement plan
   under Section 1112 of the ESEA:

   (List actions.)

2. The _____name of school district___________ will take the following actions to
   involve parents in the process of school review and improvement under Section
   1116 of the ESEA:

   (List actions.)

3. The _____name of school district___________ will provide the following
   necessary coordination, technical assistance, and other support to assist Title I, Part
   A schools in planning and implementing effective parental involvement activities to
   improve student academic achievement and school performance:

   (List activities.)

4. The _____name of school district___________ will coordinate and integrate
   parental involvement strategies in Title I, Part A with parental involvement strategies
   under the following other programs: [Insert programs, such as: Head Start, Reading
   First, Early Reading First, Even Start, Parents As Teachers, Home Instruction
   Program for Preschool Youngsters, and State-operated preschool programs], by:

   (List activities.)

5. The _____name of school district___________ will take the following actions to
   conduct, with the involvement of parents, an annual evaluation of the content and
   effectiveness of this parental involvement policy in improving the quality of its Title
   I, Part A schools. The evaluation will include identifying barriers to greater
   participation by parents in parental involvement activities (with particular attention
   to parents who are economically disadvantaged, are disabled, have limited English
proficiency, have limited literacy, or are of any racial or ethnic minority background). The school district will use the findings of the evaluation about its parental involvement policy and activities to design strategies for more effective parental involvement, and to revise, if necessary (and with the involvement of parents) its parental involvement policies.

(List actions, such as describing how the evaluation will be conducted, identifying who will be responsible for conducting it, and explaining what role parents will play.)

6. The **name of school district** will build the schools’ and parents’ capacity for strong parental involvement, in order to ensure effective involvement of parents and to support a partnership among the school involved, parents, and the community to improve student academic achievement, through the following activities specifically described below:

   A. The school district will, with the assistance of its Title I, Part A schools, provide assistance to parents of children served by the school district or school, as appropriate, in understanding topics such as the following, by undertaking the actions described in this paragraph –

   - the State’s academic content standards,
   - the State’s student academic achievement standards,
   - the State and local academic assessments including alternate assessments,
   - the requirements of Title I, Part A
   - how to monitor their child’s progress, and
   - how to work with educators:

   (List activities, such as workshops, conferences, classes, both in-State and out-of-State, including any equipment or other materials that may be necessary to ensure success.)

   B. The school district will, with the assistance of its schools, provide materials and training to help parents work with their children to improve their children’s academic achievement, such as literacy training, and using technology, as appropriate, to foster parental involvement, by:

   (List activities.)

   C. The school district will, with the assistance of its schools and parents, educate its teachers, pupil services personnel, principals and other staff, in how to reach out to, communicate with, and work with parents as equal partners, in
the value and utility of contributions of parents, and in how to implement and coordinate parent programs and build ties between parents and schools, by:

(List activities.)

D. The school district will, to the extent feasible and appropriate, coordinate and integrate parental involvement programs and activities with Head Start, Reading First, Early Reading First, Even Start, Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool and other programs, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children, by:

(List activities.)

E. The school district will take the following actions to ensure that information related to the school and parent programs, meetings, and other activities, is sent to the parents of participating children in an understandable and uniform format, including alternative formats upon request, and, to the extent practicable, in a language the parents can understand:

(List activities.)

DISCRETIONARY DISTRICTWIDE PARENTAL INVOLVEMENT POLICY COMPONENTS
(Sample Template)

Note: The Districtwide Parental Involvement Policy may include additional paragraphs listing and describing other discretionary activities that the school district, in consultation with its parents, chooses to undertake to build parents’ capacity for involvement in the school and school system to support their children’s academic achievement, such as the following discretionary activities listed under Section 1118(e) of the ESEA:

- involving parents in the development of training for teachers, principals, and other educators to improve the effectiveness of that training;
- providing necessary literacy training for parents from Title I, Part A funds, if the school district has exhausted all other reasonably available sources of funding for that training;
- paying reasonable and necessary expenses associated with parental involvement activities, including transportation and child care costs, to enable parents to participate in school-related meetings and training sessions;
• training parents to enhance the involvement of other parents;
• in order to maximize parental involvement and participation in their children’s education, arranging school meetings at a variety of times, or conducting in-home conferences between teachers or other educators, who work directly with participating children, with parents who are unable to attend those conferences at school;
• adopting and implementing model approaches to improving parental involvement;
• establishing a districtwide parent advisory council to provide advice on all matters related to parental involvement in Title I, Part A programs;
• developing appropriate roles for community-based organizations and businesses, including faith-based organizations, in parental involvement activities; and
• providing other reasonable support for parental involvement activities under Section 1118 as parents may request.

ADOPTION
(Sample Template)

This Districtwide Parental Involvement Policy has been developed jointly with, and agreed on with, parents of children participating in Title I, Part A programs, as evidenced by ________________________________.

This policy was adopted by the ________name of school district________ on ________mm/dd/yy____
and will be in effect for the period of the ________20 - 20____ school year. The school district will distribute this policy to all parents of participating Title I, Part A children on or before ________________________________.

_________________________________________
(Signature of Authorized Official)

_________________________________________
(Date)

This sample template of a Districtwide Parental Involvement Policy is not an official document. It is provided only as an example.
Parent/Guardian agreement:
As a parent(guardian), I __________________________ will do my best to:
- See that my child is punctual and attends school regularly
- Set a time for homework and review it
- Stay aware of what my child is learning
- Encourage my child to read 15 minutes daily in the Just Read program
- Talk with my child about his/her school activities

Student agreement:
As a student, I __________________________ will do my best to:
- Read daily
- Participate in the schoolwide Just Read program – reading 15 minutes per day
- Attend school daily ready to learn
- Follow the Code of Conduct
- Complete all homework assignments and then turn them in on time

Teacher agreement:
As a teacher, I __________________________ will do my best to assist each student to achieve and therefore:
- Help each child grow to his/her fullest potential
- Provide instruction utilizing research based strategies that will meet all students’ instructional needs
- Provide meaningful and appropriate homework activities
- Maintain open line of communication with each student and his/her parents
- Support the independent reading program – Just Read

Principal agreement:
As a principal, I __________________________ will try to do my best to encourage:
- Parental involvement
- Provide the students with highly professional, qualified staff
- Provide an environment that allows for positive communication between the students, parents and staff
- Enforce the Code of Conduct
- Support the independent reading program – Just Read
WASHINGTON STUDENT/PARENT/TEACHER/PRINCIPAL COMPACT

GRADE: ____________________  YEAR: 20__-20__

STUDENT
As a student, I will...

* Respect myself, other students, my parents, teachers, school staff and principal;
* Always try to do my best in my work and behavior;
* Follow rules at school;
* Come to school with my supplies and completed homework;
* Show respect for school equipment and materials.

__________________________
student signature

STUDENT SUCCESS
Alone we can do little.
Together we can do so much.

-Helen Keller

PARENT/GUARDIAN
As a parent/guardian, I will...

* Respect and support my child, the staff, and the school;
* Support the rules and policies of the Council Bluffs Schools;
* Establish a time and quiet place for my child to do homework and review homework for completion;
* See my child attends school daily and arrives on time;
* Read with my child and let my child see me read;
* Talk with my child about his/her school day.

__________________________
parent/guardian signature

TEACHER(S)
As a teacher(s), I/we will...

* Respect and support students, parents, staff, and school;
* Support the rules and policies of the Council Bluffs Schools;
* Encourage each child to do his/her personal best;
* Provide a safe, drug-free, positive and healthy learning environment;
* Share information regarding each child’s needs and progress;
* Seek ways to involve parents with school and their child’s education.

__________________________
teacher(s) signature

PRINCIPAL
As a principal, I will...

* Respect students, parents, staff and school;
* Support the rules and policies of the Council Bluffs Schools;
* Provide a safe, drug-free, positive, and healthy learning environment;
* Maintain open lines of communication;
* Encourage parents to be partners in education.

__________________________
principal signature
Parent Involvement Survey
-Sample School-
20__-20__

The following statements will encourage you to reflect on family issues at your school. Please rate your school in the following areas. Circle your responses.

1 rarely 2 sometimes 3 regularly 4 always

Your school or school district:

1. Recognizes that all parents, regardless of income, educational level, or cultural background, want their children to do well in school and are involved in their children’s learning.

2. Supplies a written Title I parent involvement policy that is jointly developed with parents that outlines the partnership among the student, parent, and school.

3. Holds an annual meeting to inform parents of children in Title I programs about the Title I program.

4. Provides resources such as books, videos, and newsletters that help with better parent participation at home.

5. Encourages and provides opportunities for parental input into the design and development of the school-parent compact.

6. Schedules varied meeting times to accommodate parents’ work and childcare schedules.

7. Provides parents with ideas on how to help their children with homework.
8. Thinks of the community as an extension of the family.
   1 rarely 2 sometimes 3 regularly 4 always

9. Provides opportunities for parents to have input in the operations of the school.
   1 rarely 2 sometimes 3 regularly 4 always

10. Staff sees how diversity may be used to enrich learning experiences for students.
     1 rarely 2 sometimes 3 regularly 4 always

11. Uses information from parent and family surveys to design or change school procedures and programs.
    1 rarely 2 sometimes 3 regularly 4 always

Please comment on each of these issues.

I would recommend the following changes for how the school communicates with families:

I would recommend the following changes for the Title I services my child is receiving:

I would recommend these changes for the Title I parent involvement policy:

Please list other ways that the district can help support you in your efforts to support your child’s academic and social success:

Please list other comments or concerns here:
Title I Parent Survey
-Sample Elementary School-
-20__-20__

Please circle your response to each of the following items.

1. Do you have a clear understanding of how your child qualified for Title I assistance?
   1 2 3 4
   not much some mostly very much

2. Do you have a clear understanding of the purpose and goals of the Title I program?
   1 2 3 4
   not much some mostly very much

3. Do you have a clear understanding of the instruction and activities your child experiences in the Title I program?
   1 2 3 4
   not much some mostly very much

4. Do you have a clear understanding of what your child must accomplish in order to exit the Title I program?
   1 2 3 4
   not much some mostly very much

5. Has your child’s progress in Title I been clearly communicated to you?
   1 2 3 4
   not much some mostly very much

6. Have you been given opportunities to discuss your child’s progress with the Title I teacher?
   1 2 3 4
   not much some mostly very much

7. Has your child shown an increased interest in reading as a result of Title I instruction?
   1 2 3 4
   not much some mostly very much

8. Did you attend Title I Parent Teacher Conferences?
   No  Yes

9. Did you attend Title I Parent Night?
   No  Yes
10. Would you be willing to serve on the Title I Advisory Committee?
   No  Yes

If so, please write your name and contact information.

<table>
<thead>
<tr>
<th>Name</th>
<th>Phone number</th>
<th>E-mail</th>
</tr>
</thead>
</table>

My suggestions for improving the Title I program:

Comments or suggestions for the Title I teachers:
STATEMENT OF AGREEMENT (PRIVATE SCHOOLS)

Note: If your district provides Title I service to a private school, the Statement of Agreement form must be completed in order to receive Title I funding.

For technical assistance on the statement of agreement process, contact the Title I consultant for your particular AEA.

Section 1120 of the No Child Left Behind Act of 2001 (NCLB) mandates Title I services for children in private schools under Title I of ESEA. In summary, the key provisions of the legislation stipulate that:

1. Any district serving a private school must complete the Within District Targeting of Funds form of the Title I electronic Internet application. The completion of this form determines the amount of funds available to provide Title I services to eligible students in the private school. Note: Even if the private school declines Title I services, the Within District Targeting of Funds and Statement of Agreement forms MUST be completed.

2. Timely and meaningful consultation between public and private school administrators must be held to discuss services to be provided in the private school, private school eligibility for Title I services, and evaluation of the Title I services provided to the private school. Documentation of the meeting is required (agenda, notes, e-mails). Note: In the case of declined services, the notification to this effect must be maintained as part of the Title I application.

3. The LEA and the private school must each retain a summary of Title I services to be provided to private schools.

4. Services in private schools are provided to private school children who reside in a Title I participating public school attendance area/s and are in the greatest educational need of those services.

5. Title I eligible private school students must be selected using multiple, educationally related, objective criteria established by the LEA. Poverty is NOT a criterion for receiving Title I services.

6. Title I funds for service in a private school are based on the documented student poverty count in the private school.

7. Title I services in a private school must be equitable to those provided in the public school—as funds described above allow.

8. The public school district is never allowed to pay or remit Title I money directly to the participating private school; the public school is always the fiscal agent. Services, materials and equipment must be ordered and paid for by the LEA.

9. Equipment and supplies purchased with Title I funds for use in a private school must be labeled “Title I” and are the property of the public school through which the Title I dollars flow. Computer equipment and other materials and supplies can only be used by and for Title I eligible students in the Title I program.

10. Title I services can only be provided to Title I eligible students. Services must be provided in a separate space that is under the LEA's control when Title I services are being provided. If the services are provided in a library or private school classroom, the space must be separate and partitioned off.

11. Multiple private schools in an LEA may pool funds and provide services as a single entity.

12. Public and private schools in the same LEA do not have to provide services to the same grade span group.

13. Title I services in a private school must operate as Targeted Assistance Programs. Schoolwide Programs in private schools are not allowed under the NCLB law.

14. Title I programs in private schools must be evaluated using a process similar to that of the public school programs.

The purpose of the Statement of Agreement form is to ensure that the LEA will provide educational services to help educationally disadvantaged children enrolled in private schools meet high standards. All Title I applications covered by this agreement must be in accordance
with provisions of P.L. 107-110, pertinent State statutes and opinions of the Attorney General. This agreement may be terminated by mutual consent of both parties at any time during the school year.

The activities covered by this agreement shall be funded through Title I, No Child Left Behind Act of 2001 funds allocated to the LEA and must be supervised and administered by the local education agency.

The Statement of Agreement form will be initiated by the district Title I coordinator and affirmed by the private school official. If there is more than one private school within the LEA, a separate form must be completed for each private school even if Title I services have been declined. Click on the appropriate private school name from the Title I program list on the Title I Home screen to select the Statement of Agreement form.

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<thead>
<tr>
<th>Form Name</th>
<th>Status</th>
<th>Updated By</th>
<th>Updated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title I Assurances</td>
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<td>8/18/2014</td>
<td></td>
</tr>
<tr>
<td>Selection of Schools</td>
<td>District not Updated</td>
<td>8/18/2014</td>
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</tr>
<tr>
<td>General Budget</td>
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<td>Homeless Education</td>
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<tr>
<td>Staff Assignments</td>
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<tr>
<td>Within District Targeting of Funds</td>
<td>District not Updated</td>
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<tr>
<td>Title I Narratives for Targeted Assistance</td>
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<td>Schoolwide Operating Programs</td>
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<tr>
<td>Upload parent policy and compact</td>
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<tr>
<td>Notre Dame Elementary School Statement of Agreement</td>
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<td>Notre Dame High School Statement of Agreement</td>
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<tr>
<td>Title I Equipment Inventory</td>
<td>District not Updated</td>
<td>8/18/2014</td>
<td></td>
</tr>
</tbody>
</table>

Note: Complete this form for each approved private school in your LEA; even if the private school has declined Title I service.

Title I services for private school students must be developed in consultation with officials of the private school. The No Child Left Behind Act (NCLB) requires timely and meaningful meetings with private school officials and a written affirmation from private school officials that the required consultation has occurred. The Statement of Agreement form has been revised to meet this requirement.

The Statement of Agreement form includes a separate form for each accredited private school within the LEA. The name of the private school and the name and title of the authorized private school representative will be automatically entered on the form. The status information on the Title I Home screen will give an update of the progress of the district in completing the required steps of the Statement of Agreement process and will give a final outcome for each consultation.
Districts that have eligible private schools within their boundaries must respond to the questions regarding private school participation for each private school within the LEA boundaries. The private school start date and the date of timely and meaningful consultation between public and private school officials must be completed. **Note:** The date of the consultation regarding Title I services must be, at a minimum, before the first day of school for the private school.

If the private school has declined Title I service, select "No" for the last two questions and enter the date Title I services were declined by the private school. Click the Finish button. The Title I Home screen will change the status to "Waiting on private school" and automatically send an email to the private school official. The private school will be asked to verify that, at minimum, a conversation took place in which the private school declined Title I service for the current school year.

If the private school has attended the consultation and accepted Title I service, select “Yes” for the last two questions. The following table will automatically appear.

Section 200.63 of the Title I regulations address the minimum components that must be discussed as part of timely and meaningful consultation. Timely is defined as before the private school starting date. Meaningful is defined as all key
components were discussed. The public school must report whether these components as outlined above were included in the discussion between public and private school officials.

During consultation, remind private school officials they will receive and must respond to email. The private school official will receive an automatic email notification from the Iowa Department of Education Title I web application with instructions on how to review the private school portion of the Statement of Agreement form. It should be understood by both parties that affirmation by the private school official only indicates that each topic was discussed during the public/private school consultation; it does not imply approval of the decision of each topic. Both parties should be aware that the public school has the final say in Title I services and does not have to do all that is asked by the private school. Once the form is affirmed by the private school, the public school official will not be able to make changes to that portion of the Statement of Agreement form. **Note:** Failure on the part of the private school official to affirm the Statement of Agreement form for their private school will prevent the approval of the public school Title I application.

If the district is providing service to a private school, at the first question the user should select whether the Title I services will be located at a neutral site, within the private school or within the public school. The public school representative must then select the appropriate yes or no response for each of the additional questions and click the **Finish** button. There must be a response to each of the items. If the response to any of the discussion components is “No” the public school must go back and continue consultation with the private school until all responses can be answered in the affirmative. Once this occurs and the user clicks the **Finish** button, an email will automatically forward to the private school official for review and affirmation. During this period, the status will reveal that the district is waiting for the private school to respond.

✔ **TIP:** Do NOT double-click the Finish button.

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This automatic e-mail from the Iowa Department of Education has been generated by the Title I application of the local Comm School District where your school is located. Local Comm School District has completed the Statement of Agreement with your school.

To verify the information provided by the district, please go to [https://portal.ed.iowa.gov/iowalandingpage/Landing.aspx](https://portal.ed.iowa.gov/iowalandingpage/Landing.aspx), login, and select 'PrivateSchool Statement of Agreement.'

Review the information the district has submitted.

If you need to change the **Authorized Representative, Title, or Email,** make those edits and click the **Save** button.

If the information shown is correct and you affirm the Agreement, click the **FINISH** button. The **FINISH** button only indicates that each topic was discussed during the public district/private school consultation. It does not imply your approval of the decision of each topic.

If you believe any topic was not discussed or find errors in other information, please contact the public district to discuss your concerns.

If the district needs to make a change on the Statement of Agreement screen, click the **DENY** button. After the district determines the need for changes, you will receive another email.

If you do not have an Iowa Department of Education login or you do not see the **Private School Statement of Agreement,** contact your school's web security person and have them add the application for you.

If you need assistance accessing the Title I application through the Portal contact:

- ed.portal@iowa.gov
- 515/725-2040
- jean.alfred@iowa.gov

An email will be sent to notify the public school representative that the private school has affirmed the Statement of Agreement and that the user may continue to work on the district’s Title I application.

If the private school does not agree with the public district, an email will be sent to the public school representative stating that the private school has clicked the **Deny** button. If the private school official does not agree with the responses, a comment box is available for noting the concerns. If the private school official believes that any topic(s) were not discussed, they should contact the public school representative to discuss the concerns.
If the district needs to make a change on the Statement of Agreement, click the **Undo** button. After the district makes the changes, the private school official will receive another email. The Title I coordinator and private school official must work to resolve the private school concerns and achieve affirmation. If the private school concerns cannot be resolved, the private school may file a complaint with the Iowa Department of Education. Updated information about the complaint process will be found outlined under the Title I, Part A section of the Iowa Department of Education web site at [http://educateiowa.gov](http://educateiowa.gov).

**Note:** Both the LEA and the private school must verify that all elements of the consultation process occurred before the LEA will be able to submit the Title I application and receive funding.

The public school representative must repeat this process for each private school within the public school boundaries in order to maintain a written record of compliance with the requirements for private school consultation and services in Section 1120 of the Title I statute and Section 200 of the Title I regulations.

If the district is serving one or more private schools, the LEA must correctly calculate equitable services for private school students regarding parental involvement requirements. This can be done either through independent parent involvement activities or in conjunction with the LEA’s activities. If they are done independently, there must be an equitable distribution of funds for these activities. The Statement of Agreement form affirmation process provides the opportunity for the private school to verify that delivery of parent involvement activities was discussed during consultation.

According to federal private school Title I services guidance, consultation between public and private school officials is intended to be an ongoing process to begin in November or December of the prior year in preparation for the coming school year and continues through October of the current school year. For further information on private school Title I programs, please refer to the Private School Guidance under Title I, Part A section of the Iowa Department of Education web site. "Ensuring Equitable Services to Private School Children," a private school toolkit is an online resource available at [http://www2.ed.gov/programs/titleiparta/ps/titleitoolkit.pdf](http://www2.ed.gov/programs/titleiparta/ps/titleitoolkit.pdf). Specific questions regarding private school service should be addressed to the appropriate Title I consultant for the user’s district.

✔️ **TIP:** If there is a private school within the boundaries of the LEA, the private school section of the Selection of Schools form, the Within District Targeting of Funds form, and the Statement of Agreement form must all be completed regardless of whether the LEA is providing Title I services to that private school.

The complaint procedure for private schools may be found on the Iowa Department of Education web site under Title I, Part A [https://www.educateiowa.gov](https://www.educateiowa.gov). Private school officials must be informed of their right to submit a written complaint to the SEA when they believe the LEA has not engaged in timely and meaningful consultation or considered the views of the private school. This does not mean that the public school must do what is asked by the private school. The public school has the final say in Title I services.

*Click Title I Equipment Inventory form to be completed next.*
**Title I Equipment Inventory**

Note: If your district purchases equipment or property with Title I funds, you must complete this form and depreciate out the inventory annually.

For technical assistance on completing the Title I equipment inventory, contact Geri McMahon at geri.mcmahon@iowa.gov or 515/281-3944.

**Maintaining Control of the Title I Program**

Inventory and Disposal of Title I Equipment

It is imperative that the local education agency maintain title to and control of Title I funds, books, materials, equipment, and property. Materials of any kind purchased with Title I funds may be used only by Title I participants and under the direction of Title I paid staff. Each item purchased with Title I funds must be labeled “Property of ___________ School District.” The labels should not be either easily erased or removable.

The Title I statute clearly states that the LEA must have a method to track materials, equipment, and property purchased with Title I funds and located in the private school. The Title I program must be conducted in space used (at the time) exclusively for Title I instructional services and the control of federal funds and title to materials, equipment, and property purchased with Title I funds must be with the LEA. Title I equipment and materials may only be used by Title I eligible students and under the direction of Title I paid staff.

The Depreciation Schedule for Title I Equipment is to provide guidance to the user in updating the Title I Equipment Inventory and Disposal Record.

The Title I Equipment Inventory form is for use in maintaining, as part of the LEA Title I records, an inventory of equipment purchased with Title I funds. The Title I Equipment Inventory form must be completed with new equipment purchased during the 2013-14 school year. This form must be uploaded as part of the Title I application and is due **September 15**.

The Title I Equipment Disposal Record is to be used to list any equipment purchased with Title I funds in recent school years. Title I equipment must be depreciated each year using the schedule below and reported accordingly on the Title I Equipment Disposal Record. The completed Title I Equipment Disposal Record should be kept on record at the local education agency.

✔️ TIP: Failure to submit the Title I Equipment Inventory will delay the approval of the Title I application.

**Depreciation Schedule for Title I Equipment**

**Furniture**

Library tables, bookcases, school desks, file cabinets, chairs, etc., -- 10 years

**Audio-Visual**

TV - 5 years

Carts, all types – 5 years
Computers (keyboard, monitor, disc drive, etc.) – 5 years

Computer tablets - 3 years

Printers - 5 years

Other

Items not covered should be referred to this office. All books, kits, tapes, software, etc., are considered materials and supplies; therefore, these items should be removed from the equipment inventory of the LEA.

The user should enter the name of the local education agency representative certifying the accuracy of the Equipment Inventory and that representative’s official title within the district.

If the district has no Title I equipment or property purchases to report, click the Finish button to receive the “District Finished” status on the Title I Home screen and be allowed to proceed with the Title I application process.

To complete the form, the user should enter the date the property or equipment item was acquired, a description of the item, the quantity and original cost for one item, and the location of the item. The total will automatically calculate and be entered. If it would become necessary, the user may click the Delete button to remove a line within the Equipment Inventory. Click the Add New Equipment button to continue to add lines to the Equipment Inventory form.

When the Equipment Inventory form has been completely updated, click the Finish button. The user will be taken to the Title I Home screen where the Equipment Inventory form will display the “District Finished” status.

Click the Neglected Narratives form, if applicable to your district, to be completed next.
NEGLECTED AGREEMENT, NARRATIVES, ASSURANCES

Note: If your district receives local neglected funding, you must complete the Neglected Narratives form to receive Title I local neglected funding.

For technical assistance with local neglected education programs, contact the Title I consultant for your particular AEA or Rick Bartosh at richard.bartosh@iowa.gov or 515/281-0368.

A signed agreement between the LEA and the local neglected facility must be kept on file at the district and a copy uploaded to the Title I application. This agreement must be reviewed annually. A sample agreement follows and is available at https://www.educateiowa.gov under Title I Part D. The LEA is responsible for the annual evaluation of the local neglected program.

Local Neglected Agreement

The ____ Community School District (CSD) and __________, a neglected youth facility, agree to coordinate and support a PL 107-110 Title I, Part D, Subpart 2 program within the neglected facility.

The _____ CSD will act as the fiscal agent and program monitor of the Title I program identified below.

The __________ facility provides assurance and documentation, upon request, that the Title I, Part D, Subpart 2 funds are being used in one or more of the following ways:

1) For programs that serve children and youth returning to local schools from correctional facilities, to assist in the transition of such children and youth to the school environment and help them remain in school in order to complete their education;
2) For dropout prevention programs which serve at-risk children and youth, including pregnant and parenting teens, children and youth who have come in contact with the juvenile justice system, children and youth at least 1 year behind their expected grade level, migrant youth, immigrant youth, students with limited English proficiency, and gang members;
3) For the coordination of health and social services for such individuals if there is a likelihood that the provision of such services, including day care, drug and alcohol counseling, and mental health service, will improve the likelihood such individuals will complete their education;
4) For special programs to meet the unique academic needs of participating children and youth, including vocational and technical education, special education, career counseling, curriculum-based youth entrepreneurship education, and assistance in securing student loans or grants for postsecondary education; and
5) For programs providing mentoring and peer mediation.

The __________ facility provides assurance and documentation, upon request, that the following services are being made available, when and where applicable, to neglected/delinquent residents at the facility:

1) Transition planning
2) Coordination of social, health, and other services
3) Business partnerships
4) Parental involvement
5) Coordination with federal, state, and local programs
6) Coordination with juvenile justice programs
7) Work with probation officers
8) Individualized education programs
9) Alternative placements

The _____ CSD shall evaluate the program and, where the number of students is sufficient, disaggregating data on participation by gender, race, ethnicity, and age, to determine the program's impact on the ability of participants —
1) to maintain and improve educational achievement;
2) to accrue school credits that meet State requirements for grade promotion and secondary school graduation;
3) to make the transition to a regular program or other education program operated by a local educational agency;
4) to complete secondary school (or secondary school equivalency requirements) and obtain employment after leaving the correctional facility or institution for neglected or delinquent children and youth; and
5) as appropriate, to participate in post-secondary education and job training programs.

The result of this evaluation shall be used to plan and improve subsequent programs for participating children and youth.

Describe how the services provided to any local delinquent facility with Title I local delinquent funding will be used to meet the transitional and academic needs of students so that they may return to local district or alternative education programs.

The ________ facility will provide the following service(s) using Title I, Part D, Subpart 2 funds:

1) 
2) 

(to be reviewed annually)

Authorized Signatures for LEA and facility and dates

The Neglected Narratives form will be pre-populated with the name of each local neglected facility within the local education agency receiving local neglected funding for the current school year. When the user clicks the Upload button next to each facility name, you will be given access to browse your files for the above completed agreement. Once the document is located, click the Upload button to attach the agreement to the Title I application. This process will need to be repeated for each local neglected facility listed on the Neglected Narratives form. (The same agreement may be used if individual facilities operate under one parent organization.)
TIP: Consider typing the narrative responses into a word document, then cut and paste into the narrative boxes. Click Save often to save your changes.

Local neglected funds may be spent in any of five different ways. In each of the five narrative boxes, the user must describe how the Title I local neglected funds will be used to provide services at the local neglected facility to meet the academic and transitional needs of students so that they may return to local district or alternative education programs. Narratives should be reflective of services identified in the Agreement. As appropriate, indicate “NA” in the narrative box if the local neglected funds are not used for the purpose stated.

The five narrative questions are:

- Describe how the Title I local neglected funds will be used to provide services at the local neglected facility to assist children and youth in the facility to complete their education and/or transition services.
- Describe how the Title I local neglected funds will be used to provide services at the local neglected facility for dropout prevention.
- Describe how the Title I local neglected funds will be used to provide health and social services at the local neglected facility.
- Describe how the Title I local neglected funds will be used to provide vocational and technical education, etc., at the local neglected facility.
- Describe how the Title I local neglected funds will be used to provide mentoring and peer mediation at the local neglected facility.

Following the five narrative boxes, is a comment box where you may enter any comment you may have about the neglected narrative.

Neglected Assurances

Each correctional facility entering into an agreement with an LEA under Section 1423(2) to provide services to children and youth under Part D, Subpart 2 must review the 11 assurances noted at the bottom of the Neglected Narrative screen and respond “Yes” or “No” to the statement: “The district assures that the above assurances have been met” before the district Title I application can be approved. Once the assurances statement has been answered, the user should click Finish.

Once the user clicks the Finish button, validation edits will run. Once all validation edits are passed, the user will be returned to the Title I Home screen and the status will be “District Finished” for the Neglected Narratives form.
Iowa Department of Education

SUBMITTING THE APPLICATION

Note: This step must be followed before the district Title I application will be sent to the State for processing.

For technical assistance on submitting the application, contact the Title I consultant for your particular AEA.

As the user progresses through the list of application forms required for their local education agency under the Title I Program, “District Finished” will appear as the status as each form is completed.

Once the user has completed each form and attained the “District Finished” status, a Submit button will appear at the bottom of the list of required forms.

<table>
<thead>
<tr>
<th>Form Name</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title I Assurances</td>
<td>District Finished</td>
</tr>
<tr>
<td>Selection of Schools</td>
<td>District Finished</td>
</tr>
<tr>
<td>General Budget</td>
<td>District Finished</td>
</tr>
<tr>
<td>Homeless Education</td>
<td>District Finished</td>
</tr>
<tr>
<td>Staff Assignments</td>
<td>District Finished</td>
</tr>
<tr>
<td>Within District Targeting of Funds</td>
<td>District Finished</td>
</tr>
<tr>
<td>Title I Narratives for Targeted Assistance</td>
<td>District Finished</td>
</tr>
<tr>
<td>Schoolwide Operating Programs</td>
<td>District Finished</td>
</tr>
<tr>
<td>Upload parent policy and compact</td>
<td>District Finished</td>
</tr>
<tr>
<td>Title I Equipment Inventory</td>
<td>District Finished</td>
</tr>
</tbody>
</table>

Clicking the Submit button will notify the Title I consultant that the application is ready for the State review and approval process. Once the user has clicked the Submit button, the district will not be able to make changes to the Title I application forms. If there would be the need to make a change to information submitted in the application, please contact the Title I consultant for your AEA.
Iowa Department of Education

**REPORTING TITLE I EXPENDITURES**

**Note:** All LEAs must report Title I expenditures in order to receive full Title I funding.

For technical assistance on reporting Title I expenditures, contact the Title I consultant for your particular AEA.

At the end of the project year, the district must declare final expenditures and complete the project budget via their Title I application. To initiate the process to report the district’s actual Title I expenditures and receive final payment, as applicable, please follow the process outlined for each Title I program (general budget, carryover budget, migrant budget, local delinquent budget, SINA budget). Please note that all Title I budgets are to be finalized **prior to July 15**.

The most critical step to reporting Title I expenditures is to first decide if the budget you are reporting on needs to be amended. You need to file an amendment if:

- The total expenditures are less than the approved budget amount.
- The total spent in an expenditure category exceeds the budgeted amount by more than 10 percent.
- There are reimbursable Title I expenditures not included in the approved budget.

**Note:** If the district needs to file an amendment, please follow through with that process before reporting the Title I expenditures for the program.

Once a Title I application has been approved by the program consultant and Title I administrative consultant, the district will receive an email to that effect. At this point there will only be two options: to add an amendment or finish the budget. After April 15, the Finish button will appear on each Title I budget to allow a district to report Title I expenditures as final.

✔️ **TIP:** The Finish button should **NOT** be clicked until the end of the project year when expenditures have been made and the district is ready to close out the program following the process outlined in this section.

To finalize a budget, go to the budget form of the Title I application program. Work your way through the following questions to determine if your district is ready to finalize or needs to complete a budget amendment before finalizing.

**Are Title I project expenditures complete? Complete means all costs approved on budget have been paid (exception: salaries and benefits, which are fixed costs).**

**NO** - Title I project expenditures, other than salaries and benefits, are NOT complete. You must wait until all Title I expenditures have been paid to close out your budget and then start the process over by answering this question again.

**YES** – Title I project expenditures, other than salaries and benefits, are complete. The next question is:

**Is the following a true statement: A review of our Title I expenditures shows that:**

- **We did not spend less than the approved budget amount;**
- **We do not want to spend funds for something we did not include in the approved budget; and**
- **Our expenditures in any category do not exceed the approved amount by more than 10%.**

**NO** – Our expenditures do **not** meet all three of the conditions above. You must complete an amendment process prior to reporting Title I expenditures as final.
YES – The district Title I contact and/or business manager agree that our expenditures meet all three of the conditions above. You may click the Finish button to finalize your program for the current school year and initiate the final payment, as applicable, to your district.

✔ TIP: You are reminded that the Finish button should not be selected until the user is certain all project budget expenditures are final and accurately listed in the project budget being certified as complete.

The local education agency is required to report Title I expenditures as final for each approved program (i.e. Title I general and carryover funds, migrant funds, local delinquent funds, SINA funds).
AMENDING A TITLE I BUDGET

Note: When amending to reflect your actual expenditures, please wait for the amendment to be approved by the State Title I office before reporting Title I expenditures as final.

For technical assistance on amending a Title I budget, contact the Title I consultant for your particular AEA.

For various reasons, it may become necessary for a local education agency to amend an approved Title I budget during the project year. You need to file an amendment if:

- The total expenditures are less than the approved budget amount.
- The total spent in an expenditure category exceeds the budgeted amount by more than 10 percent.
- There are reimbursable Title I expenditures not included in the approved budget.

To complete this process, the LEA must submit an electronic amendment to the applicable approved budget of the Title I application. **Note:** If the district needs to file an amendment, please follow through with that process before reporting the Title I expenditures for the program.

The option for amending the Title I budget becomes available on the electronic budget form once the State Title I office approves the LEA’s general, general carryover, migrant, local delinquent or SINA budget. At that time, the Add Amendment button will appear on the budget form.

**Note:** Prior to beginning the amendment process, the user will want to have a hard copy of the original budget for Title I files and reference. The following is the electronic amendment process:

1. From the applicable budget form, click the Add Amendment button. The approved budget figures will be displayed on the budget form.
2. Change the figures that need to be changed by clicking on the appropriate place in the budget and entering the new figure.
3. **TIP:** the category total will change automatically for the specific budget item being amended. NEVER try to enter a figure in a category total.
4. Do not make changes to those figures that remain the same as they appeared on the original approved budget. The amended budget must reflect the total expenditures you plan to have for the amended project budget. **(Note:** if the user is amending the general budget and you also have carryover funds, the amended general budget total plus the approved general carryover budget total should equal the expected total Title I reimbursement for the current project year. For example, if the district has an approved general budget of $110,000 and an approved general carryover budget of $25,000, but the total Title I expenditures for the year is only $125,000; the user should amend the general budget to $100,000.)
5. Click the Save button to save the new amended budget. Click the Finish button to return to the Title I Home screen.
6. The amendment will be submitted to the state Title I office only after you click the Submit button.

Once the user has clicked the Submit button the SEA will be alerted that the LEA has completed the amendment process. The amended budget will go through the approval process at the state Title I office. As budget amendments are approved, necessary adjustments in payments will automatically be made. If an amendment has been made to the general budget that affects carryover for the coming year, the carryover will be reflected on the Payment Status form in the difference between the allocation amount and the approved amount; and will be reflected on the next year’s allocation notification letter and the LEA’s Title I budget form.
You are reminded that, by law, a district with an allocation of $50,000 or more may only carry over 15% of the allocation. Once every three years the SEA is allowed to grant a waiver of the excess carryover. A district must submit a Waiver of Excess Carryover to apply to use the excess funds.

**Note:** The original budget will be available following an amendment process by using the lookup box at the top of the budget table.

✔️ **TIP:** Any current year general budget funds approved but not spent are only available as carryover funds in the next school year through the completion of an amendment that reduces the unspent funds out of the current year approved general budget.

**Note:** When amending to reflect your actual expenditures, please wait for the amendment to be approved by the state Title I office before reporting Title I expenditures as final.
Iowa Department of Education

**SCHOOLWIDE INDICATION OF PLANNING**

**Note:** For a school building entering a year of planning to become a Schoolwide program, the user will need to request that the Title I consultant have this form added to the LEA’s Title I Program form menu.

For technical assistance with Schoolwide programs, contact your district’s Title I Consultant or Sandy Johnson at sandra.johnson@iowa.gov or 515/281-3965.

Once the Schoolwide Indication of Planning form has been added to the LEA Title I Program application, select it from the menu.

The user only completes the Schoolwide Indication of Planning screen if, during the current school year, one or more buildings intend to participate in the required year of planning before operating a Title I schoolwide program in the coming school year. **NOTE:** During the planning year to become a schoolwide program, a building must operate as a targeted assistance program.

The user should complete the required information for each building that intends to participate in a year of planning for a schoolwide program by using the dropdown menu to select the LEA Title I buildings that are planning to operate a schoolwide program in the next school year and clicking the **ADD** button.

Once the user clicks the **ADD** button, the following table will open on the Schoolwide Indication of Planning screen.
For each building participating in a planning year during the current school year, the user should enter the building enrollment and building low-income percentage as it appears on the Selection of Schools form and indicate the source of the poverty data (e.g., Free/Reduced Price School Lunch). The user should enter the anticipated school year the building will implement the schoolwide program remembering that the building must continue as a targeted assistance building during the planning year.

The principal, a school leader, or a district official usually convenes a small representative group from the school to begin pre-planning. The team should include widely respected individuals who know and have the confidence of the school’s various constituency groups. The schoolwide planning team members should include:

- building and LEA administrators;
- teachers representing all grades, content areas, and teams;
- representatives of other professional staff, including social workers, psychologists, counselors or diagnostic specialists, curriculum leaders;
- parents and community representatives;
- representatives or organizations, groups, and parents of students served by the Federal programs whose funds are used in the schoolwide program;
- students.

The user should enter the name and title or position of each schoolwide planning team member.

<table>
<thead>
<tr>
<th>School Building Information:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Name</strong></td>
</tr>
</tbody>
</table>
| **Address** | School Mailing Address  
City, State, Zip |
| **Grade Levels** | PK-03 |
| **Principal** |  |
| **Telephone** |  |
| **Enrollment** |  |
| **Low-Income Percentage** |  |

**Anticipated Schoolwide Program Implementation School Year**

(must continue as a Targeted Assistance Building during planning year)

<table>
<thead>
<tr>
<th>Schoolwide Planning Team Members</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>(includes staff and parent/community representatives)</td>
<td></td>
</tr>
</tbody>
</table>
| Provide name and title/position for each member.  
For example: John Smith, Principal |  |

Select a building and click the ADD button to add another school to the list:

Middle School  
ADD
Iowa Department of Education

**TITLE I GENERAL INFORMATION**

Title I Part A of the Elementary and Secondary Education Act of 1965 (ESEA) provides local educational agencies (LEAs or school districts) with extra resources to help improve instruction in high-poverty schools and ensure that all children have a fair, equal and significant opportunity to obtain a high-quality education and to reach, at a minimum, proficiency on challenging academic standards. The *No Child Left Behind Act of 2001 (NCLB)* re-authorizes the ESEA and incorporates major reforms for education reform, particularly in the areas of assessment, accountability, and school improvement. NCLB requires the development of standards in reading and math, and assessments linked to those standards for all students in grades 3-8. LEAs and schools must use Title I funds for activities that scientifically based research suggests will be most effective in helping all students meet those standards.

**STATE TITLE I POLICIES**

Iowa has established a limited number of State policies that are not mandated by Federal regulations. These policies are as follows:

1. The SEA has established a $1,000 minimum for a carryover allocation. Carryover funds are computed by subtracting the approved current budget figure from the current allocation. Title I legislation allows an LEA to carryover, at maximum, 15 percent of the current allocation for allocations of $50,000 or more. However, the SEA may, once every three years waive the percentage limitation. LEAs having allocations of less than $50,000 are limited only to the State established $1,000 carryover minimum. **Note:** In order to use currently approved unspent funds as carryover, you must amend the previous year's current budget to the actual expenditures.

2. The SEA withholds funds from LEAs with delinquent participation data forms, equipment inventory and/or disposal record, comparability reports, parent involvement policy/student compacts or school improvement plans not on file as required.

**TITLE I GRANT AVAILABILITY AND ALLOCATION PROCESS**

**Title I, Part A Grants**

Title I, Part A funds are allocated to LEAs under four funding formulas. Basic grants represent roughly 90 percent of annual funding. Concentration grants have been appropriated since 1989-90 as additional funds allocated to LEAs with high numbers or percentages of low-income children. Beginning with the 2002-2003 school year, Congress has appropriated two additional supplementary mechanisms. Similar to concentration grants, targeted grants are intended to boost the share of Title I funds received by high-poverty LEAs by specifically focusing funds on the highest-poverty LEAs. Education finance incentive grants (EFIG) rewards states with high levels of school finance equity by giving all LEAs some extra money. Targeted grants and EFIG grants are not separate programs, but simply a way of providing extra aid to LEAs. Once the funds arrive at the LEA, they may be commingled and used for identical purposes. Title I grants to local education agencies provide financial assistance to LEAs for supplemental services to improve the teaching and learning of children at risk of not meeting challenging academic standards, especially those children who reside in areas with high concentrations of children from low-income families.

Title I is forward-funded. This means that funds are appropriated for a given Federal fiscal year (FFY) beginning October 1, but the monies are not available for expenditure until the school year (SY) that begins the subsequent July 1. For example, funds appropriated in the fall of 2013 for FFY 2014 (October 1, 2014–September 30, 2015) are available for SY 2014-2015, which begins July 1, 2014. Funds are available for 15 months (July 1, 2014 – September 30, 2015). The Tydings Amendment of 1969 allows LEAs to carry over for one additional year any Federal education funds that were not obligated in the period for which they were appropriated. Thus,
appropriations are available for a total of 27 months. Carryover funds allow LEAs to maintain a reserve to cover unanticipated expenses or cushion the LEA from unexpected declines in Federal funding. In 1988, Congress enacted a 15 percent ceiling on the amount of Title I funds that an LEA may carry over from year to year. However, an LEA receiving an allocation of less than $50,000 is exempt from the 15 percent limit, and states may grant an LEA a waiver to carry over funds in excess of the 15 percent limit once every three years.

Until the 1999-2000 school year, the U.S. Department of Education calculated allocations down to the county level, using several data elements. Counties did not actually receive funds, but were the smallest geographical unit for which the Federal government had all the necessary data. States sub-allocated the county amounts to LEAs within each county, in a separate allocation process.

Beginning in school year 1999-2000, the Title I statute required the U.S. Department of Education (ED) to allocate Title I grants to eligible LEAs rather than counties. ED allocations reflect the list of LEAs as they exist on maps provided to the Bureau of the Census by each state. Children, between the ages of 5 to 17, with the appropriate status (low-income, foster child, etc.) may be counted for the purpose of generating funds. These children are commonly termed “formula children.” The U.S. Department of Education determines the eligibility of each of these LEAs for a Title I grant using the number of formula children under section 1124(c) of Title I; that is, updated poverty estimates produced by the Census Bureau, children above poverty in families receiving Temporary Assistance for Needy Families (TANF), foster children reported by the Department of Health and Human Services, and children living in institutions for neglected children reported by each state to the U.S. Department of Education. (Note: In Iowa, there are no children receiving TANF payments who have family incomes above the poverty line.)

Census poverty data used in the federal allocation formula are derived from the decennial census and statistically updated every two years. In calculating 2004-2005 allocations for LEAs, the U.S. Department of Education used income year 2000 census estimates and Iowa received a total 1.7 million dollar increase over previous year funding. Throughout the last decade, census data was updated at least biennially resulting in overall increases in Title I funding from year to year. Updated income year 2012 census estimated numbers of related children ages 5-17 in families in poverty, estimated total school-age population and the estimated total resident population for each LEA were used by ED to compute school year 2014-2015.

To be eligible for basic grants, an LEA must have at least 10 formula children and the number of formula children must be greater than two percent of the LEA’s total school-age population. To be eligible for concentration grants an LEA must have more than 6,500 formula children or the number of formula children must exceed 15 percent of the LEA’s total school-age population. To be eligible for targeted grants, the number of formula children counted in an LEA for basic grant purposes must be at least 10 and equal or exceed 5% of the LEA’s total school-age population. In addition, the funding formula adjusts the number of formula children to give greater weight to those LEAs that have higher numbers or percentages of formula children. The eligibility criteria used to determine whether an LEA qualifies for an education finance incentive grant (EFIG) allocation are the same as for targeted grants. The State’s EFIG is allocated to LEAs using a weighted formula similar to the targeted grants formula. The within-state weights used are determined to the degree to which expenditures are equalized across school districts.

Allocations to LEAs that serve an area with a total population of 20,000 or more will be the allocation determined by the U.S. Department of Education, subject only to SEA adjustments for hold-harmless requirements and reservations for State administrative funds. Title I legislation permits a SEA to combine the U.S. Department of Education allocations to LEAs that serve an area of fewer than 20,000 total residents and use an approved alternative method to determine eligibility and redistribute the combined total of funds allocated to those “small” LEAs. In an effort to retain funding for as many Iowa school districts as possible, the Iowa Department of Education and the State Title I Committee of Practitioners examined allocation methods. The Iowa Department of Education is approved by the U.S. Department of Education to use the alternative allocation process that is found to be most equitable.

Prior to the 1999-2000 school year, the Iowa Department of Education used October free lunch counts and the most current year low-income dependent revenue data to determine the eligible formula counts for each LEA by county of residence. The county allocations were then allocated using the appropriate formula count and the county allocations compiled for each LEA to determine the new allocation and adjust according to the hold-harmless requirement.

With the approval of the U.S. Department of Education for the Iowa Department of Education to use an alternative allocation process, the SEA finds the use of free lunch and low-income data continues to be the most equitable method for allocating Title I funds to LEAs under 20,000 population. Therefore, the data elements used in allocating Title I funds in Iowa is free lunch counts as reported by LEAs and private schools annually for October 31 and low-income dependents, ages 5-17, as reported annually by the Iowa Department of Revenue and Finance from income tax returns.
This data is compiled to determine low-income children for each LEA. Since this data could represent a duplicated count, an average is computed to determine the formula count for each LEA. From surveys of local neglected institutions, the caseload count representing the number of children from the October caseload who resided in the institution for 30 consecutive days, at least one of which was in October, is added to each LEA formula count as applicable. The population counts are the corresponding LEA enrollment of children ages 5 to 17 multiplied by 0.5. The LEA’s eligibility is based upon the number and percent of formula children; and alternative allocations made on the basis of eligible formula children.

Any funds allocated to an LEA for the purpose of serving local neglected children must be identified separately on the General Budget Detail form and included as part of the LEA’s Title I Current Project Budget of the Title I electronic Internet application.

The ED amounts for Title I, Part A grants will also include funds generated by children in locally operated institutions for delinquent children and adult correctional institutions that the SEA retains to make subgrants to LEAs under Part D, Subpart 2 of Title I. Surveys of local delinquent institutions provide October caseload data. Part D of NCLB requires the SEA to retain funds generated by local delinquent children and to make subgrants to LEAs through a formula or competitive grant process for programs that serve local delinquent children or children at risk of dropping out of school. In Iowa, the SEA allocates local delinquent funds to LEAs to provide services within institutions having a caseload of at least 10 children residing in the institution for 30 consecutive days at least one of which is in October. An LEA applies for local delinquent funds on the Delinquent Application, Delinquent Budget and Delinquent Narrative forms of the Title I electronic Internet application.

The Title I law specifies that if appropriations are insufficient to fully fund all Title I entitlements in any given year—which has been the case virtually from the start—grants will be ratably reduced. However, in the 1974 education amendments (P.L. 93-380), Congress adopted a mechanism to cushion LEAs from radical drops in their Title I allocations from one year to the next. The 1974 amendments created a “hold-harmless” provision that specified that, as long as an LEA was eligible for the program, it would receive a basic grant that was no less than 85 percent of the amount it received in the preceding year. This protected an LEA’s allocation regardless of any other variables that might affect the level of the allocation. For FY 96, there was a one-time exception providing eligible LEAs with a 100 percent hold-harmless for both basic and concentration grants. For FY 97 and succeeding years, Congress established a variable hold-harmless system, which was to provide greater security for LEAs with higher levels of poverty. Under this system, LEAs with at least 30 percent low-income children were guaranteed 95 percent of their previous year funds, LEAs between 15 and 30 percent poverty were guaranteed 90 percent, and LEAs below 15 percent were guaranteed 85 percent of their funds.

No hold-harmless was established for concentration grants. However, the FY 1998 Appropriations Act established a 100 percent hold-harmless provision at the LEA level for Basic and Concentration Grants for 1998-99, which was intended to limit the impact that the use of the updated census data had on allocations. The 100 percent hold-harmless provision was still in place for the 2001-2002 school year. Beginning in school year 2002-2003 the Title I legislation applied the variable hold-harmless rate of 85% to 95% based on the formula percent of low-income, to the funding formulas for all four grants (basic, concentration, targeted grants, EFIG). For concentration grants under NCLB, the hold-harmless provision applies to an LEA for four consecutive years even if the LEA no longer meets the eligibility threshold. Therefore, an LEA that was last eligible for a concentration grant in SY 2009-2010 but was not eligible in SY 10-11, 11-12, 12-13 and 13-14 will receive the hold-harmless amount in SY 2014-2015. If that LEA, however, fails to meet the concentration grant eligibility thresholds for SY 2014-2015, it will no longer be eligible for the hold-harmless guarantee.

By statute, the hold-harmless provision only applies as far as funding is available. It should be understood that the hold-harmless provision only provides a temporary cushion against a decline in funds; it does not establish a permanent floor for an LEA’s federal funding. If a decline in the number of low-income children or a drop in program funding dictates a sharp reduction in an LEA’s grant, the hold-harmless system simply allows the LEA to conduct an orderly phase-down of its federally funded activities. Moreover, LEAs that drop below the minimum poverty threshold for program eligibility will experience abrupt termination of their funding, without the benefit of a phase-out period.

All LEA amounts are ratably reduced to cover statutorily authorized set-asides for State administrative costs and school improvement activities. Title I legislation allows the SEA to reserve up to 1% of funds allocated under Part A to carry out administrative duties related to Title I. NCLB also requires the SEA to reserve 4% of Part A allocations to carry out state and local school improvement activities.
Migrant Education Program (Title I, Part C)

Migrant Education is a national program that provides supplemental education and support services to eligible migrant children each year. Migrant Education funds are allocated to SEAs to establish or improve programs of education for children of migratory agricultural workers or of migratory fishers. In compliance with the No Child Left Behind Act of 2001, LEAs systematically identify and serve migrant eligible students who reside within their area/boundaries. Services may vary from one LEA to another, depending upon the numbers of students identified and their needs. These services help children of migrant workers overcome the disadvantages they face, including disruption to their education. Services provided may include preschool programs, individual tutorial in the content areas, before and after school programs, summer school programs, supportive health services in cooperation with other agencies, Parent Advisory Council (PAC), and Spanish translating and interpreting services.

Migrant workers seek temporary or seasonal work in agriculture, fishing or related industries, including food processing. They follow the growing seasons across the country and are largely responsible for the cultivation and harvest of fruits, vegetables and many other food products. Agribusiness in Iowa includes meatpacking plants, grain companies, egg processing plants, poultry processing, crop work, and food processing plants. Many migrant workers have an average income below the national poverty line. The migrant population is made up of diverse ethnic groups. In Iowa, Hispanics make up the largest group, with Southeast Asians, African Americans, Anglos and other racial and ethnic groups completing the remainder of the migrant population. While many migrant families consider Iowa to be their home base, many come from Texas, California, Florida, Mexico and other states and countries.

To qualify for the Migrant Education program, a migrant child must have moved within the past three years across state or school district lines with, or to join, a migrant parent or guardian to enable the child, the child’s guardian or member of the child’s immediate family to obtain temporary or seasonal employment in an agricultural, fishing, or food processing activity. The child may be in any grade between preschool and grade 12 and must be 3 through 21 years of age (without a high school diploma or equivalent) to qualify to receive services in a migrant education program.

Each State’s grant is based, in part, on the full-time equivalent number of migratory children, ages 3-21, who reside in the State, as adjusted to reflect migratory children served in special summer or intercession programs. In Iowa, the SEA allocates migrant education funds to LEAs on the basis of reported numbers of migratory children.

The LEAs must complete the Migrant Education Application, Migrant Budget, Migrant Budget Detail and Migrant Program Narratives forms of the online Title I Annual Application. Funding is allocated by formula to LEAs with 5% of the enrolled students identified as eligible migrant and is based upon the submission of a separate weighted funding application that details priority for services criteria such as mobility, limited English proficiency, and migrant student achievement.

2014-2015 Iowa Title I Migrant Education Programs

Eight Iowa school districts will receive 2014-2015 Migrant Education Program funding to provide supplemental preschool programs, before and after school programs, content area tutorials, health services and instructional resources. These 2014-2015 Migrant education programs will be funded in the community school districts of Columbus, Denison, Marshalltown, Ottumwa, Perry, Postville, Storm Lake, and Williamsburg. For information or assistance with the migrant education program in Iowa, contact Susan Selby at the Title I office at 515/281-4732 or susan.selby@iowa.gov.

Neglected and Delinquent Program (Title I, Part D, Subpart 1 and 2)

Title I, Part D, Subparts 1 and 2 of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind Act of 2001 (H.R. 1/P.L. 107-110) authorizes grants to SEAs for education programs that serve children and youth in State-operated institutions or community day programs for neglected or delinquent (N or D) children and in adult correctional facilities. State allocations are based on the number of N or D children enrolled in a regular program of instruction for at least 1) 15 hours per week if in an adult correctional institution, and 2) 20 hours per week if in an institution or community day program for N or D children. State agencies responsible for providing free public education for N or D children apply directly to the SEA for these funds. In Iowa, the Iowa Department of Corrections and the Iowa Department of Human Services receive allocations that are determined, on the basis of the reported caseloads, by the U.S. Department of Education. The Iowa Department of Corrections provides Title I service at the Anamosa State Penitentiary, Clarinda Correctional Facility, Fort Dodge Correctional Facility, Iowa Correctional Institution for Women in Mitchellville, Mt. Pleasant Correctional Facility and Newton Correctional Facility. The Iowa Department of Human Services provides Title I service at the Iowa Juvenile Home in Toledo, State Training School in Eldora and Independence Mental Health Institute. For information or assistance with the State neglected or delinquent program in Iowa, contact Rick Bartosh at 515/281-0368 or richard.bartosh@iowa.gov.
Subpart 2 creates a program that provides assistance to local educational agencies (LEAs) to serve children and youth who are in locally operated correctional facilities, including institutions for delinquent children, or are at-risk of dropping out of school. State educational agencies (SEAs) award Subpart 2 funds to LEAs to conduct programs that provide a wide array of services to meet the special needs of at-risk children and youth. The U.S. Secretary of Education allocates Part D, Subpart 2 funds for each state based on the October caseload data on the number of children and youth living in local institutions for delinquent children. From funds allocated to the State for Part D, Subpart 2 purposes, the SEA awards subgrants to eligible LEAs. The SEA has the option of awarding subgrants either through a formula or a discretionary grant process based on need. In Iowa, grants are awarded on a formula basis to LEAs for local delinquent institutions with an October caseload of 10 or more. The LEA receiving local neglected and/or delinquent funding must act as the fiscal agent for these funds.

The purpose of the Subpart 2 program is to support LEA programs that involve collaboration between LEAs and local correctional facilities, including local institutions and community day programs for delinquent children and youth to carry out high quality education programs that prepare youth to complete high school, enter training or employment programs, or further their education; to facilitate the transition from programs in the institutional setting to further education or employment; or to operate dropout prevention programs in local schools for youth at risk of dropping out or youth returning from correctional facilities or delinquent institutions.

LEAs receiving local neglected education funds designate program costs as part of the LEA general budget. To complete the local neglected application process, an LEA must complete the Title I electronic Internet application General Budget, General Budget Detail, Staff Assignment, and Local Neglected or Delinquent Narrative forms as appropriate. In addition, an agreement between the LEA and the local neglected institution must be completed and kept on file at the district as well as mailing a copy to the state Title I office. The LEA is also responsible for evaluating the local neglected Title I program.

LEAs receiving local delinquent education funds make application to use such funds on the Delinquent Application, Delinquent Budget, Delinquent Budget Detail, Staff Assignment, and Local Neglected or Delinquent Narrative forms as part of the Title I electronic Internet application. In addition, an agreement between the LEA and the local delinquent institution must be completed and kept on file at the district as well as mailing a copy to the state Title I office. For information or assistance with local delinquent education programs, contact the Title I consultant for your AEA.

**AUDITING TITLE I FUNDS**

The U.S. Congress amended the Single Audit Act of 1984 in 1996. The Office of Management and Budget (OMB) has withdrawn Circular A-128 and revised Circular A-133 “Audits of States, Local Governments, and Non-Profit Organizations,” to include governmental entities previously covered by A-128. The revised circular, which regulates the implementation of the Single Audit Act Amendments of 1996, was released on June 24, 1997.

Previously, all LEAs regardless of Federal funding level were required to have their annual audits conducted in accordance with OMB Circular A-128, “Audit Requirements for State and Local Governments,” or its successor. Currently, all Iowa local education agencies that expend a total of $300,000 or more in Federal awards in any fiscal year will have an annual audit conducted in accordance with OMB Circular A-133 as is required by the Single Audit Act Amendments of 1996. LEAs expending less than $300,000 in Federal awards in any fiscal year will not be required to have their annual audits conducted in accordance with OMB Circular A-133. Instead, those agencies will have an audit that follows the requirements of Chapter 11 of the Code of Iowa. SEA staff will review audits for areas of non-compliance and will follow up as appropriate.

The Single Audit Act Amendments of 1996 included language that limited the use of Federal money to pay audit costs. The Act stated that those LEAs expending less than $300,000 in Federal awards in any fiscal year could not charge any of the costs of a Single Audit to Federal programs. LEAs expending at least $300,000 in Federal awards in any fiscal year could charge to the Federal award a reasonable, proportionate share of the cost of the audit, if the audit was conducted in accordance with the Single Audit Act Amendments of 1996.

The exemption from conducting the annual audit in accordance with OMB Circular A-133 will not exempt an agency from compliance with any provision of a Federal statute or regulation that requires the agency to maintain records concerning Federal awards provided to it or that permits a Federal agency, pass-through entity, or the Comptroller-General access to such records. Questions and comments on this process should be addressed to Janice Evans, 515/281-4738 or janice.evans@iowa.gov.
CODING TITLE I ACCOUNTS

Immediately after receipt of a check for Title I funds, the check should be deposited to the credit of the proper Title I expenditure account using the updated Title I accounting codes for Uniform Financial Accounting. The proper codes for Title I are as follows:

4501 – Title I Grants to Local Education Agencies (CFDA 84.010A) including SINA funds
4503 – Migrant Education (CFDA 84.011)
4506 – Title I, Part D Subpart 2 Local Delinquent
4508 – Title I Grants to LEAs, carryover (Funds become available on July 1 and are coded under 4501 for the first 15 months, July 1 to September 30 of subsequent year; if funds are not completely obligated at the end of the 15 months, they become carryover funding coded to 4508)

Note: A word on interest-bearing accounts from the Iowa Department of Education Office of Internal Administrative Services:

Per 20 U.S.C. 1221e-3, 3474, and OMB Circular A-110, interest earned on Federal advances deposited in interest bearing accounts shall be remitted annually to the US Department of Health and Human Services, Payment Management System, Rockville, MD 20852. Please note the CFDA number to which the interest earned applies. On each CFDA number, if the amount of interest earned is $250 or less annually, that amount may be retained by the recipient for administrative expense.

If the funding received is being used to cover an expense incurred prior to the receipt of funds, this provision does not apply.

The approved Title I project budget expenditure category amounts are the controlling figures in determining the need for an amendment. A 10 percent variance is permissible for an expenditure category provided the total approved budget amount is not violated. The two exceptions to the 10 percent variance are:

1. Indirect Cost - This figure cannot exceed the amount approved in budget function 2300, column 8.

2. Employee Benefits - This figure cannot exceed the amount approved if only FICA and IPERS are the itemized approved charges. Salaries paid by Title I will be the controlling figure to use in computing the employee benefits amount. However, if insurance benefits have been approved in the budget, the 10 percent expenditure category variance could then be applied insofar as this cost item would affect the approved Title I expenditure category figure.

When the LEA realizes that the 10 percent expenditure category variance will hamper the Title I program and penalize the LEA in a financial manner, the proper procedure is for the LEA to file an amendment to the Title I electronic Internet application that will reflect the proper expenditure amounts (see the Amendment Instructions section of this document).

The title to and administrative control over equipment acquired with funds provided under Title I must be retained and exercised by a public agency. In exercising that administrative control, the public agency shall not only keep records of and account for the equipment, but also shall assure itself that the equipment is being used in Title I service delivery.

TITLE I PROGRAM REQUIREMENTS

Maintenance of Effort

An LEA may receive its full allocation of Title I, Part A funds for any fiscal year only if the SEA determines that the LEA has maintained its fiscal effort in accordance with Section 9521 of ESEA. Section 9521 provides that an LEA has maintained fiscal effort for any fiscal year only if the SEA finds that either the combined fiscal effort per student or the aggregate expenditures of the LEA and the State with respect to the provision of free public education by the LEA for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year. In addition to Title I, Part A, the maintenance of effort (MOE) requirement of Section 9521 apply to the following ESEA programs:

- Title I, Part D, Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk;
- Title I, Part F, Comprehensive School Reform;
- Title II, Part A, Improving Teacher Quality State Grants;
- Title II, Part D, Educational Technology State Grants;
• Title III, Part A, English Acquisition State Grants;
• Title IV, Part B, 21st Century Learning Centers; and
• Title VI, Part B, Subpart 2, Rural Education.

If an LEA fails to meet the MOE requirement, the SEA must reduce the amount of funds allocated under the programs covered by the MOE requirements in any fiscal year in the exact proportion by which the LEA fails to maintain effort by falling below 90 percent of either the combined fiscal effort per student or aggregate expenditures.

For a year in which an LEA failed to maintain effort, the expenditure amount a SEA uses for computing maintenance of effort in subsequent years will be 90 percent of the prior year amount rather than the actual expenditure amount.

The Secretary of Education may waive the MOE requirement if it is determined that such a waiver would be equitable due to exceptional or uncontrollable circumstances such as a natural disaster; or a precipitous decline in the financial resources of the LEA.

In determining whether an LEA has maintained fiscal effort, a SEA must consider the LEA’s expenditures from State and local funds for free public education. These include expenditures for administration, instruction, attendance and health services, pupil transportation services, operation and maintenance of plant, fixed charges, and net expenditures to cover deficits for food services and student body activities.

Expenditures for community services, capital outlay, debt service, or supplemental expenses made as a result of a Presidential disaster declaration are not to be included in the determination. In addition, any expenditure made from funds provided by the Federal government is excluded from the determination.

For purposes of determining maintenance of effort, the “preceding fiscal year” is the federal fiscal year, or the 12-month fiscal period most commonly used in a state for official reporting purposes, prior to the beginning of the federal fiscal year in which funds are available. For example, federal funds first available July 1, 2014, for federal fiscal year beginning October 1, 2013, (current state fiscal year beginning July 1, 2014), the preceding state fiscal year 2013 begins on July 1, 2012, and the second preceding state fiscal year 2012 begins July 1, 2011.

The following table gives an example of the maintenance of effort determination and reduction of funds as used for school year 2014-2015 allocation purposes.

<table>
<thead>
<tr>
<th>Line</th>
<th>Description</th>
<th>Aggregate Expenditures</th>
<th>Amount Per Student</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Amount LEA spent in 2nd preceding fiscal year (state FY 2012, which began July 1, 2011)</td>
<td>$1,000,000</td>
<td>$6,100</td>
</tr>
<tr>
<td>2</td>
<td>Amount LEA had to spend in the preceding fiscal year (state FY 2013, which began July 1, 2012) in order to maintain effort (90% of 2nd preceding year’s expenditures)</td>
<td>900,000</td>
<td>5,490</td>
</tr>
<tr>
<td>3</td>
<td>Actual amount LEA spent in the preceding fiscal year (state FY 2013)</td>
<td>850,000</td>
<td>5,200</td>
</tr>
<tr>
<td>4</td>
<td>Amount by which the LEA failed to maintain effort (Line 2-Line 3)</td>
<td>-50,000</td>
<td>-290</td>
</tr>
<tr>
<td>5</td>
<td>Percent the SEA must reduce the LEA’s allocation (Line 4/Line 2)**</td>
<td>-5.6%</td>
<td>-5.3%</td>
</tr>
</tbody>
</table>

** The SEA uses the percentage that is most advantageous to the LEA

In this example, which uses state fiscal year (FY) 2012 and FY 2013 as the comparison years, the LEA needed to spend $900,000 in the aggregate during the preceding fiscal year (FY 2013) to meet the 90 percent level, but spent only $850,000. As a result, the LEA failed to meet the 90 percent level by $50,000 or 5.6 percent ($50,000 / $900,000). Similarly, on a per student basis, the LEA needed to spend $5,490 per student during the preceding fiscal year, but spent only $5,200 per student. The LEA failed to maintain effort on a per student basis by $290 or 5.3 percent ($290 / $5,490). Therefore, unless the Secretary of Education grants a waiver, the SEA must reduce the LEA’s school year (SY) 2014-15 allocation by 5.3 percent (the reduction most favorable to the LEA).

Both Title I schoolwide and targeted assistance programs are expected to meet Comparability and Maintenance of Effort requirements.
Schoolwide Programs

Title I targeted assistance schools may become a schoolwide program if the poverty level in the building is at least 40% and they spend a year developing a schoolwide program plan based upon building level needs assessment. All children within a schoolwide program school are considered eligible Title I students. Services are integrated into the regular school program with the focus on improving building level achievement while addressing the needs of low-achieving children and those most at risk of not meeting the State student academic achievement standards. A copy of the Title I schoolwide program building plan must be on file at the Iowa Department of Education.

Supplement vs. Supplant in Title I Buildings

Under section 1120A(b)(1) of Title I, funds must be used only to supplement, not supplant the amount of funds that would, in the absence of Title I funds, be made available from non-federal programs. Title I funds may be used in targeted assistance buildings only for programs that provide service to eligible children identified as having the greatest need for special services. Title I funds may not be used in a targeted assistance program building to provide services otherwise required by law to be made available. Title I funds must not be used to supplant local funds in schoolwide program schools (Section 1114(a)(2)(B)).

A determination of supplanting necessitates determining what activities an LEA would conduct with non-federal funds if it had no Title I, Part A funds. Several situations give rise to a presumption of supplanting (i.e., a presumption that the LEA would conduct the activity with non-federal funds if it had no Title I, Part A funds available):

a. the activity is required by local, State, or other Federal law;
b. the LEA conducted the activity in the prior year with non-federal funds; or
c. the LEA uses non-federal funds to provide the same activity for non-Title I students or in non-Title I schools that it provides with Title I, Part A funds for Title I students in Title I schools.

Supplement vs. Supplant

If Title I was not here, Title I students would still get all meals. Title I is a supplementary program.
Title I students would not get what the regular education students receive. This is supplanting and constitutes a misuse of Title I funds.

Targeted Assistance Buildings

Schools ineligible to be schoolwide programs or those that choose to not operate a schoolwide program must use funds only for programs that provide services for children identified as in greatest need of assistance. Schools offering this type of Title I program are referred to as targeted assistance schools (TAS). The vast majority of Title I funded buildings in Iowa operate as a targeted assistance program. In school year 2013-2014, there were 407 Title I targeted assistance buildings compared to 194 Title I schoolwide program buildings.

A targeted assistance program targets services on specific, identified children. A student is eligible for services if he/she is failing or most at risk of failing, to meet the State’s challenging student academic standards. Identification must be based on multiple, educationally related, objective criteria. Targeted assistance Title I services offered must be supported by a written selection process. For preschool through second grades, multiple developmentally appropriate measures, which may include teacher judgment and parent interviews, are used to identify children in greatest need. For grades three and above, multiple educationally related, objective criteria and uniform procedures are used to identify and select students in greatest need for program participation. Economically disadvantaged, disabled, migrant, ELL students and children who at any time in the two preceding years participated in Head Start or Even Start are eligible for Title I service based on the same criteria as other children. Children who at any time in the two preceding years received services in a local neglected or delinquent institution or in a neglected or delinquent community day program or who were considered homeless may also be eligible.

Title I funds must be spent on supplementary services for students most in danger of failing to achieve district reading and/or mathematics standards. Supplementary service is in addition to what would happen in the absence of Title I funds. Title I programs must be designed based on “scientifically based research.” In a reading program, this includes phonics, phonemic awareness, vocabulary, fluency and comprehension. The LEA must have a parent notification policy for notifying parents of their child’s eligibility to participate in Title I services; and must develop written procedures to enable children to enter and exit the program throughout the school year.

Title I Teacher responsibilities in Targeted Assistance Programs:
- Teach teaching by teacher paid with Title I funds;
- Co-teaching by teacher paid with Title I funds;
- Guided reading by Title I teachers as part of the regular class with both Title I and non-Title I students.
Title I Preschools

Local Title I funds may be used for preschool programming. No additional funds are provided for this purpose. A Title I preschool may operate in conjunction with an early childhood special education preschool program, a district-operated preschool, a private pay preschool, or a combination of those programs. Iowa Quality Preschool Program Standards (IQPPS) are recommended for all Iowa preschool programs. For IQPPS information contact Penny Milburn at 515/281-7844, penny.milburn@iowa.gov or Amy Stegeman at 515/725-2273, amy.stegeman@iowa.gov. For more information on programs and services to support early childhood education of Iowa’s young children, refer to the web site at http://educateliowa.gov/index.php?option=com_content&view=article&id=1229&Itemid=2113.

Title I Program Evaluation

Federal legislation requires that an LEA have a system in place for annually evaluating the Title I program. The effectiveness of the implementation of, and results achieved by the Title I program, within each school, can be annually evaluated by using either Iowa’s QIC-Decide model consisting of questions and the analyzing and sharing of collected data, or by using a series of program evaluation surveys distributed to all Title I families and classroom teachers at Title I schools. The annual review is intended to determine if Title I strategies are contributing to the desired outcomes of improved student achievement, greater parental involvement, and more high quality professional development. Parents and staff should be included in the review process for the purpose of suggesting potential programming needs and/or changes. The Title I school must revise its plan as necessary based on the results of the evaluation to ensure continuous improvement. The Title I program evaluation should focus on utility, relevance, and practicality; remain open to continuous feedback; adjust the program based on the feedback; determine what information is needed to make decisions; and be willing to commit to understanding what is really going on in the program. Title I services to private school students must be evaluated on an annual basis; include parent responses; and the evaluation results should be used for improvement of future services.

An effective LEA Title I Program evaluation should include:
- Information to understand the processes of the program.
- Feedback from students, parents, teachers, support staff.
- Current program outcomes and expectations.
- Instructional decisions made based on achievement data.
- Measures to understand, verify, or increase the impact of services for students.
- Improve delivery mechanisms to be more efficient and effective.
- Identify program strengths and weaknesses to improve the program.
- Verification that you are doing what you say and think you are doing.
- Gathering data to determine if your core program is sufficient. Determining if at least 80% of all students were proficient in reading/math in each grade on the Iowa Assessments.

Title I Reporting Requirements

Legislation places the responsibility for administering programs supported by federal funds under Title I on the Secretary of Education, state education agencies, and local education agencies. It is incumbent upon all concerned to use such funds in accordance with the spirit of the legislation.

The LEA must use grant funds in accordance with an approved budget and for the purposes for which the project has been approved. In addition, the LEA must maintain adequate records on all project funds by fiscal year and project number. The Title I budget and financial reports are designed to enable LEA fiscal reporting procedures to keep pace with the Generally Accepted Accounting Principles (GAAP) account structure and federal reporting requirements. If you have any questions about using GAAP procedures for maintaining Title I financial records, call Janice Evans, School Administration Consultant, at 515/281-4740 or janice.evans@iowa.gov.

Annual Progress Report

The Annual Progress Report (APR) is a document that reports on an LEA’s yearly progress. This document must be provided to the local community, respective AEA and the Iowa Department of Education. The requirements for this document are found in Chapter 12 of the Iowa Administrative Code. Progress for all buildings receiving Title I funds is included in this report. All schools and school districts are to submit an APR and Participation Rate Matrix annually by
September 15. A technical assistance document is found at 

Comparability Report

The Title I Comparability Report is mandated by Section 1120A(c) of NCLB. Comparability reports ensure that Title I funds are not being used to replace district funds (Supplement vs. Supplant). An LEA may receive Title I, Part A funds only if it uses State and local funds to provide services in Title I schools that are at least comparable to the services provided in non-Title I schools. If all schools in an LEA are Title I schools, the LEA must use State and local funds to provide services that are substantially comparable in each school. Because Title I allocations are made annually, this is an annual requirement. Title I schools must receive comparable services each year. LEAs must maintain records and evidence of procedures for compliance of comparability. Records must be kept on file in the district for five years and made available, upon request, to local, state, and federal authorities for auditing and/or program review purposes.

- The LEA may exclude schools that have fewer than 100 students (use official enrollment date).
- A district that has only one school per grade span, with no overlapping grades between schools, does not need to complete a comparability report.
- Only LEAs with two or more buildings of similar grade spans and at least one Title I school must report on comparability.

Because the SEA is ultimately responsible for ensuring that LEAs comply with the comparability requirement, the SEA may establish the method a district uses to determine comparability.

**Iowa school districts that are required to report on comparability will be notified by the state Title I office. Approximately 17% of Iowa school districts are currently required to report on comparability.**

Comparability Report Forms will be sent to districts that must report on comparability. LEAs will use the official October 1 enrollment information for pupil counts and staff FTEs. The Comparability Report is annually due November 15.

Questions regarding comparability may be directed to Sandy Johnson at 515/281-3965; or sandra.johnson@iowa.gov.

The following districts were required to report comparability in the 2012-2013 school year:

- Ames
- Ankeny
- Bettendorf
- Boone
- Burlington
- Cedar Falls
- Cedar Rapids
- Charles City
- Clear Creek-Amana
- Clinton
- College
- Council Bluffs
- Davenport
- Des Moines
- Dubuque
- Eddyville-Blakesburg
- Fairfield
- Fort Dodge
- Fort Madison
- George-Little Rock
- Grinnell-Newburg
- Griswold
- Highland
- Indianola
- Iowa City
- Johnston
- Le Mars
- Linn-Mar
- Maquoketa Valley
- Marion Ind
- Marshalltown
- Mason City
- Mid-Prairie
- MOC-Floyd Valley
- Mount Pleasant
- Muscatine
- Newton
- North Butler
- North Cedar
- North Polk
- North Scott
- Ottumwa
- PCM
- Pella
- Sioux City
- Southeast Polk
- Union
- Urbandale
- Wapsie Valley
- Waterloo
- Waukee
- Waverly-Shell Rock
- West Central Valley
- West Des Moines
- Western Dubuque
- West Fork

**Comprehensive School Improvement Plan**

The Comprehensive School Improvement Plan (CSIP) is a multi-year consolidated planning document that LEAs use to integrate programs used within the school district. Title I is incorporated into this document in numerous ways. Ideally, Title I would be infused in the overall document rather than provided as a separate entity. Title I issues addressed are parent involvement, identification of eligible students, staff development activities and an annual review of the program. These requirements are found in Section 1118(a) of P.L. 107-110 (H.R. 1) of the No Child Left Behind Act of 2001 and do not apply to accredited private schools. The SEA provides technical assistance at http://www.educateiowa.gov/index.php?option=com_content&view=article&id=300&Itemid=2722.
Financial Reporting

Title I Part A Funds

Although the U.S. Department of Education makes allocations to LEAs, the SEA is the grantee; funds are drawn by the SEA and forwarded to each LEA. To apply for Title I funding, an LEA must submit an application consisting of statistical and fiscal data to obtain funding for a proposed program to help disadvantaged children meet high standards. The Title I Annual Application is an electronic process via the Internet. The benefits of the electronic process include ease in completion of forms and elimination of errors via electronic calculations and error messages; also paper reduction and relief of mail delays as well as quicker response time for approval. The Title I electronic application has undergone some revisions necessary to ensure that the application will bring the SEA and the LEA more in compliance with federal regulations and statutes. The Title I application for 2014-15 is new and improved. The required data elements remain the same under NCLB but the application process is more user friendly. Title I funds may be used to acquire hardware and proper connections, if necessary.

Title I payment authorization dates are November 1, January 3, and April 1. Title I payment authorization dates designate when the Title I payment process to LEAs will be initiated. It is the intent of the Title I office and SEA accounting unit that the payment will be received by the district at the earliest possible date but no later than the end of the payment authorization month. One month prior to the November and January authorization dates, districts with late reports will receive an email from the Title I administrative assistant to alert the LEA that no payment will be received unless the late report is received within 10 days. Late reports would include, as applicable, participation report (due July 15), parent involvement policy and student compact (due September 15 with Title I application), comparability report (due November 30).

On November 1 Title I payment will be authorized for all districts that have, at minimum, applied and have a district certified general and/or carryover budget. Payment is 25% of general budget and 50% of carryover budget amount. No local delinquent or migrant budget payment unless they happen to be fully approved; and, then, payment would be 25% of each budget approved amount. Payment held for districts with late reports (i.e. participation report).

The January 3 Title I payment will be authorized only to LEAs with district certified and State approved budget. Payment is 25% of general, local delinquent and migrant budget approved amount, 50% or 100% of carryover budget approved amount. Payment held for districts with late reports (i.e. participation or comparability report).

An April 1 Title I payment will be authorized only to districts with certified and approved budgets and no late reports. Payment is 25% of general, local delinquent and migrant budget approved amount; 100% for any carryover budget approved but not paid.

Final payment on the Title I project, not to exceed the balance due on the approved amount, will be made after the project is closed and the Project Budget Completion process has been completed and approved by the State Title I Office. The final payment will be the difference between receipts and approved actual expenditures. Carryover projects are forward funded; then the LEA will be expected to complete the final certification process to close the project. The Payment Status form on the Title I electronic Internet application will keep the LEA abreast of the allocation, approved amount and payments received to date. When the LEA has a summer school program for its sole Title I program, one check will be sent when the program is completed.

At any time after April 15, an LEA may certify any budget as final provided the expenditures for that project are final or considered fixed, such as salary and/or benefit costs. All projects must be certified as final no later than July 15. Prior to clicking the Finish button, an LEA should review the approved budget to verify that it accurately reflects the way the Title I funds were spent for that project. If an amendment process is necessary, it will be necessary to amend and wait for State approval of the amendment before the project is closed with the Finish button. With prior approval from the Title I administrative consultant, LEAs with budgets over one million dollars will have until August 10 to amend and finalize budgets.

A separate set of ledger cards and/or computer data management system must be maintained according to Generally Accepted Accounting Principles for each approved project. This data management system should include expenditure category account codes, vendor’s name, amount paid, invoice number, date paid, and check number. These data records must be available for audit purposes and submission to the SEA upon request.

The final financial reporting process is completed via the Title I electronic Internet application. As soon as possible after all bills have been paid, the General Budget form, General Carryover form, Migrant Budget form, and/or Local Delinquent
The following represents an explanation of forms and timelines relating to a normal one-year cycle in the Title I program.

**Title I Program Forms**

1. **Title I Electronic Internet Application - due in approvable form by September 15 for following school year**
   - The Title I electronic Internet application is submitted by LEAs to obtain funding for a proposed program to help disadvantaged children meet high standards. The funds are available for a 27-month period (e.g. 7-1-14 to 9-30-16). The Title I Annual Application is only available in electronic format.
   - Any LEA applying for Title I funds for the current school year must complete the Annual Application, Selection of Schools, Staff Assignments, Project Narrative, Homeless Education and General Budget forms. The Within District Targeting of Funds, General Carryover, Statement of Agreement, Migrant Application, Schoolwide Operating Programs, Schoolwide Indication of Planning, and Delinquent Application forms are completed as applicable.
   - This document includes an explanation of the application parts and step-by-step instructions for completing the electronic application.
   - The Title I electronic Internet application may be accessed at https://portal.ed.iowa.gov. The Iowa Department of Education Iowa Education Portal site will appear. On the blue navigation menu bar, highlight “A&A Account” and click on “Sign In.” On the “Sign In” tab, enter your Account ID (email address) and password to sign into DOE – Education Portal. Click the “Sign In” button.
   - The person responsible for the Title I financial records for the LEA needs to have a copy of the approved application and any amended budgets, as well as invoices from teachers, principals, etc. This is especially important when the financial person and the Title I coordinator are not the same person.
   - The allocation letter, sent via email to the superintendent and Title I coordinator, will give the amount of funds available for each type of grant monies for which the LEA qualifies. While an earlier notification date is desirable, the allocation letter is usually sent in June or July depending on the release of allocations by the U.S. Department of Education.

2. **Project Budget Completion Final Certification - due after approved expenditures are paid – no later than July 15**
   - After April 15, the LEA will have a Finish button appear on the General Budget form, General Carryover form, Migrant Education Budget form, Local Delinquent Budget form and/or Schools in Need of Assistance (SINA) Budget form of the Title I electronic Internet application.
   - This Finish button is to be used to certify the project for final payment.
   - This should be done only after all approved expenditures for that project have been paid. The difference between the amount paid to date and the expenditures is the final payment that closes the project.
   - If a carryover project is being reported and the total approved amount has already been received, the Finish button is used to certify that expenditures have been paid as approved and close the project.
   - This process replaces sending in a paper final financial report to close a project.
   - Please refer to the Reporting Title I Expenditures section of this guidance on closing out a Title I budget. By law, Title I records must be kept for a total of 5 years plus current.

Budget form should be reviewed by expenditure category to verify that the approved budget reflects total actual expenditures, to be reimbursed by Title I, at the completion of a project. **If changes need to be made in order for the budget to accurately reflect actual expenditures, an electronic amendment process is completed first and then the final certification takes place following the SEA approval of the amendment.** If the budget is correct, the user simply clicks on the Finish button and the project is complete. The SEA will in most cases, make final payment within two or three weeks of the LEA certifying the budget as final. All Title I budgets are to be finalized no later than July 15. Please refer to the Reporting Title I Expenditures section of this guidance on closing out a Title I budget. By law, Title I records must be kept for a total of 5 years plus current.
3. **Amendment to Title I Electronic Internet Application – may be completed as needed**
   - When a change in budget items or program content needs to be made in the approved Title I budget, the LEA needs to submit an electronic amendment. This process can be completed whenever the need arises prior to completing the project budget completion final certification.
   - Any General Budget funds approved but not spent are only available as carryover funds through an electronic amendment that reduces the approved budget to a budget that reflects only actual expenditures.
   - The ability to amend is part of the Title I electronic Internet application filing process. Please refer to the guidance that gives detailed instructions on amending a Title I project budget.
   - The Title I electronic Internet application may be accessed at [https://portal.ed.iowa.gov](https://portal.ed.iowa.gov). The Iowa Department of Education Iowa Education Portal site will appear. On the blue navigation menu bar, highlight “A&A Account” and click on “Sign In.” On the “Sign In” tab, enter your Account ID (email address) and password to sign into DOE – Education Portal. Click the “Sign In” button.

4. **Comparability Report – due annually on November 15**
   - Iowa school districts containing two or more buildings with similar grade spans must report on comparability.
   - Done as a paper report in the past, will be converted to the new Title I electronic Internet application process for 2014-15.
   - Comparability should be performed annually.

5. **Title I Participation Report – due by July 15**
   - The **Title I Participation Report** is the means by which LEAs report various statistical data to the SEA as it relates to current school year Title I programs and students served.
   - The **Title I Participation Report** survey monkey link is forwarded through e-mail to selected Title I coordinators.
   - All data relating to public school students served can now be gathered from Student Reporting in Iowa (SRI).
   - The **Title I Participation Report** must be completed before the LEA can receive funds on the next year’s Title I project.
   - Local neglected or delinquent institutions receiving Title I funding must complete a separate report including statistical and academic performance data.
   - LEAs receiving local neglected or delinquent funding must assure the statistical data for local neglected or delinquent children served is reported by the institution.
   - Local neglected or delinquent institutions receiving Title I funding should develop a method for collection of the appropriate data to ensure funding is not jeopardized due to a failure to report according to Federal requirements.
   - These data are required elements that must be reported by the SEA to the U.S. Department of Education annually.

6. **Title I Equipment Inventory and Disposal Record - due September 15**
   - It is important for the LEA to maintain title to and control of Title I funds, books, materials, equipment, and property. In exercising that administrative control, the public agency shall keep records of and account for the equipment, but shall also assure itself that the equipment is being used in Title I service delivery. Materials of any kind purchased with Title I funds may be used only by Title I participants and under the direction of Title I paid staff. Each item purchased with Title I funds must be labeled “Property of __________________________ School District.” The labels should not be either easily erased or removable.
   - The LEA must locally maintain an inventory of equipment purchased with Title I funds and send a copy of this inventory to the State Title I office.
   - An LEA is required to depreciate equipment following the **Depreciation Schedule for Title I Equipment** and report annually on the **Title I Equipment Disposal Record** the equipment deleted from inventory.
   - The **Title I Equipment Inventory form** is available as part of the Title I program application.

7. **Local Neglected and Delinquent Agreement for Title I Part D Programs – due September 15**
   - The Local Neglected and Delinquent Agreement is required between a local education agency receiving Title I Part D, Subpart 2 funds and the local neglected or delinquent institution generating those funds.
   - A sample agreement may be viewed at [http://www.educateiowa.gov](http://www.educateiowa.gov) under Title I Part D.
   - The Local Neglected and Delinquent Agreement must be uploaded to the Title I application and also kept on file at the district office.
   - The Local Neglected and Delinquent Agreement must be reviewed annually.
1. **Title I Participation Report – due by July 15**
   - The *Title I Participation Report* is the means by which LEAs report various statistical data to the SEA as it relates to current school year Title I programs and students served.
   - The *Title I Participation Report* is forwarded as needed through e-mail to selected Title I coordinators.
   - All data relating to public school students served can now be gathered from Student Reporting in Iowa (SRI).
   - The public school district should report ONLY private school student data as applicable.
   - The *Title I Participation Report* must be completed before the LEA can receive funds on the next year’s Title I project.
   - These data are required elements that must be reported by the SEA to the U.S. Department of Education annually.

2. **Number of Public School Students Qualifying for FREE Lunches - due November 30**
   - **Number of Private School Students Qualifying for FREE Lunches - due November 30**
   - Only report the FREE lunch count of K-12 students aged 5-17, as of October 31.
   - Data are used as part of the formula count used to allocate Title I funds.
   - LEAs in whole grade sharing agreements report only their own resident children regardless of the school district they attend.
   - The receiving LEA counts open enrolled students.
   - Private school students are reported according to their public school district of residence.
   - The counts are compared against what is reported for October to the Bureau of Nutrition Programs and Health Services.

3. **Request for Title I Reallocation Funds**
   - Reallocation funds are Title I Part A grant funds that were allocated to LEAs but not used in the previous year and not available to the LEA as carryover funds in the following year. These funds are then reallocated to other LEAs meeting the eligibility criteria.
   - An LEA is eligible to receive reallocation funds if the LEA shows a poverty increase over the state average since the most recent decennial census (i.e.: 2010 census data compared to the most recent Iowa Department of Revenue and Finance low-income data). Iowa Department of Revenue and Finance low-income data represents dependents, age 5-17, reported on Iowa income tax returns.
   - A *Request for Title I Reallocation Funds* is sent to each eligible LEA to allow the LEA an opportunity to apply for reallocation funds. The award of reallocation funds is based upon greatest need as justified in the LEA request. Once the *Request for Title I Reallocation Funds* is reviewed by the SEA, the LEA is notified of the available reallocation grant, if any.
   - Because reallocation funds are from the previous year’s funds, the approved reallocation funds for each LEA must be used as a carryover project and is added to the LEA’s Title I electronic Internet application as such.
   - The timeline for the reallocation process varies. It has recently been January through April; but it is possible for reallocation to take place in October or November.

4. **Notification of Excess Title I Carryover Funds – sent by SEA annually in March**
   - Carryover funds are the difference between the allocation and the approved amount on the current budget.
   - Current legislation limits carryover funds to 15 percent of the current year allocation if the LEA allocation is $50,000 or more.
   - The SEA mails the *Notification of Excess Carryover Funds* in March of each year to notify LEAs of excess carryover funds for the coming school year and the option/s available to the LEA for retaining control of these excess funds.
   - The SEA may, once every three years, waive the percentage limitation with respect to carryover.
   - All excess funds, not retained by the LEA through an electronic amendment to the current budget or submission of the *Request for Waiver of Excess Title I Carryover Funds*, are considered reallocation funds and become available to LEAs meeting reallocation eligibility.

5. **Request for Waiver of Excess Title I Carryover Funds – may be submitted at any time**
   - Carryover funds are the difference between the allocation and the approved amount on the general budget.
   - The general allocation and general approved amount can be found on the General Budget or Payment Status forms of the Title I electronic Internet application.
   - The Title I electronic Internet application may be accessed at [https://portal.ed.iowa.gov](https://portal.ed.iowa.gov). The Iowa Department of Education Iowa Education Portal site will appear. On the blue navigation menu bar, highlight “A&A Account” and click on “Sign In.” On the “Sign In” tab, enter your Account ID (email address) and password to sign into DOE – Education Portal. Click the “Sign In” button.
Current legislation limits carryover funds to 15 percent of the current year allocation if the LEA allocation is $50,000 or more.

The SEA emails the *Notification of Excess Carryover Funds* each year in March to notify LEAs of excess carryover funds for the coming school year.

With the submission of the *Request for Waiver of Excess Title I Carryover Funds* by the LEA the SEA may, once every three years, waive the percentage limitation with respect to carryover.

Excess funds that are not retained by the LEA through the approval of the Request for Waiver of Excess Title I Carryover Funds or through an electronic amendment to the current budget are considered reallocation funds and become available to LEAs meeting reallocation eligibility.

6. **Notification of Unexpended Funds for Choice-Related Transportation & Supplemental Education Services**

   In year 1 of identification for SINA or Delay, a district MUST reserve 20% of district allocation for Choice-Related Transportation.

   In year 2 or above of identification for SINA or Delay, a district MUST reserve up to 20% of the district allocation for Choice-Related Transportation and Supplemental Education Services.

   It is up to the district how the split is made, but between the two spots on the budget (line 1000 column 300 and line 2700 column 300) the total must be at least 20% of district allocation.

   An LEA must provide written explanation of the school choice transfer option to all parents even if no choice transfer options are currently available.

   The LEA must annually notify parents, through widely available and accessible means of broad dissemination, about the availability of supplemental education services.

   These parent notices must be provided by the LEA at a minimum of two enrollment windows at separate points in the school year that are of sufficient length to enable parents of eligible students to make informed decisions.

   Once the above has been assured by the LEA, the Notification of Unexpended Funds for Choice-Related Transportation and Supplemental Education Services may be obtained from and submitted to Susan Selby, susan.selby@iowa.gov for the purpose of reverting unused set-aside funds to the district's Title I general budget to be used on other allowable activities.

   The Notification of Unexpended Funds for Choice-Related Transportation and Supplemental Education Services may also be accessed through this link \Ed\data\EDGroup\Title One\Notifications of Unexpended Funds\Notification of unexpended funds 2013.8.29.docx.

By law, Title I records must be kept for a total of 5 years plus the current project year.

**Suggestions for Maintaining Title I Fiscal Records**

1. Using Generally Accepted Accounting Principles, establish separate ledger cards or a computer data management system for each approved Title I project. Keep obligations and expenditures current in order to have an unencumbered balance and actual expenditures on each expenditure category at all times. This will alert you when an amendment to a project is needed.

2. At the close of the project, after all bills are paid, the data management system will help determine expenditure totals by expenditure category for the project budget completion final certification. Keep in mind that the project budget completion final certification is very important in that it is the method of reporting actual approved Title I expenditures for the project, which is the basis for the final payment and affects carryover available for the coming school year.

3. The data management system will make it easier for the auditor at the time of the annual LEA audit to determine expenditures of Title I funds. If you also use ledger cards as a back-up system, these records can be used in conjunction with computer printouts.

4. You must be aware of approved project budgets. A copy of the approved Title I application, including attachments, and any amended budgets should be part of the Title I file.

5. Copies of invoices should also be part of the Title I file and should include the project number. Teachers, principals, etc., should be aware of the need for this information. The project number appears at the bottom of the Annual Application form of the Title I electronic Internet application and consists of the four-digit district number, a letter or combination of letters representing the funding source, and a two-digit number representing the fiscal year.
6. At the time the Title I Application is approved, expenditures for approved equipment should be reflected in the additional items added to the LEA equipment inventory. Equipment purchased with Title I funds should be labeled “Title I.”

7. Supporting documentation for entries in the accounting records is very important at the LEA level. Function, expenditure account and object as approved in the Title I budget should identify expenditures applicable to a Title I project. In addition, the assigned project number should reference expenditures to each separate project.

8. Please note that Title I, Part A payments (General, General Carryover, and SINA Budgets) should all use revenue source code 4501; Local Delinquent payments should be coded to 4506. Title I, Part C payments for Migrant Budgets should use revenue source code 4503.

9. The Payment Status form of the Title I electronic Internet application will provide a payment history with cumulative payments of all projects for the current school year. This detailed information will allow the LEA to determine if quarterly payments have been made, the balance to be received on a particular project, how the approved budget and actual expenditures are matching up, and the anticipated final payment.

10. Please notify the state Title I office if any discrepancy arises regarding the payment history recorded on the Payment Status form of the Title I electronic Internet application.

11. All Title I project budgets must be closed by July 15.

12. By law, Title I records must be kept for a total of 5 years plus the current project year.

**SUGGESTIONS FOR MAINTAINING TITLE I PROGRAM RECORDS**

With an enhanced focus on compliance monitoring, the U.S. Department of Education is requiring states to audit LEAs on a regular basis. The Iowa Title I office is in the process of designing a desk audit procedure for LEAs with smaller allocations. To facilitate the flow of the desk audit and verify compliance, the LEA Title I program records should include documentation of the following major areas of program review.

- Eligible building selection;
- Financial management (within district targeting of funds);
- Title I program plan;
- Highly qualified staff;
- Paraprofessional certification;
- Comparability;
- Parent Involvement;
- Program evaluation;
- Coordination of services;
- Standards, assessment and accountability;
- Identification and selection of eligible participants in targeted assistance programs;
- Title I funded personnel;
- Schoolwide programs plan, program and activities;
- Private school consultation, identification and selection, program, control of funds processes;
- Schools in need of assistance action plan, peer review process, parent involvement, technical assistance, corrective action processes, professional development.

Please refer to the LEA Review document in the Appendix section of this reference manual for specific review documentation information and options.

**By law, Title I records must be kept for a total of 5 years plus the current project year.**

**SCHOOLS IN NEED OF ASSISTANCE**

The reauthorized Elementary and Secondary Education Act (ESEA) *No Child Left Behind Act of 2001* continues to emphasize the goal of all students being proficient in reading and mathematics. Each year LEAs provide the adequate yearly progress (AYP) data of students in Title I schools. When a school fails to make AYP for a single year, it is identified as a school in the “Watch” year. Schools in “Watch” year status do not face sanctions. However, to fulfill Title I Federal requirements (Section 1119) of ESEA, school buildings that do not make adequate yearly progress are designated as
schools in need of assistance (SINA). Buildings identified for two or more consecutive years in reading and/or mathematics must participate in a technical assistance program provided through the SEA. Efforts at the state, district and building levels must concentrate on actions that will be undertaken to assist all students in attaining proficiency. LEAs should be cognizant of this requirement and plan educational programming that implements strategies for improved student achievement.

Reauthorized (ESEA) Title I legislation requires buildings identified as SINA to publish a public notice related to this identification. In addition, this notice must provide parents with information regarding school choice options within the LEA. The school choice requirement does not apply if the identified building is the only building within the district with the same grade span grouping.

A Statewide Support System for SINA has representatives from each area education agency. These individuals have received training to assist identified schools. The five phases of the assistance design include audit, diagnosis, design, implementation and evaluation. An identified school must develop an action plan within ninety days of notification by the Iowa Department of Education. A copy of the action plan template that schools in need of assistance must submit electronically can be found in the SINA section. For further information regarding SINA issues or the Statewide Support System process, contact Geri McMahon at 515/281-3944; geri.mcmahon@iowa.gov.

**SCHOOL CHOICE REQUIREMENTS**

Any local education agency with Title I schools identified as in need of assistance must, as the Federal law requires, “provide all students in a school identified for school improvement with the option to transfer to another public school within the local education agency (LEA) that has not been identified for school improvement.” For additional information regarding school choice requirements, contact Susan Selby at 515/281-4732 or susan.selby@iowa.gov.

**TITLE I SUPPLEMENTAL EDUCATION SERVICE PROVIDERS**

Under Title I, Part A, of the *No Child Left Behind Act of 2001* (Elementary and Secondary Education Act), low-achieving, disadvantaged students attending schools that do not make adequate yearly progress for three consecutive years (i.e., schools that are in their second year of improvement) may receive Supplemental Education Services.

States are responsible for identifying eligible supplemental education service providers (SSPs) that offer high quality, research-based tutorial programs designed to increase the academic achievement of children. State education agencies must develop and apply objective criteria to create approved lists of SSPs. States must also consult with parents, teachers, school districts and interested members of the public to identify a wide array of SSP options for students. States must update this list of approved SSPs on at least an annual basis, provide a list for school districts of the approved providers in their geographic area, and assist with the monitoring of services and program implementation.

School districts are required to arrange for the provision of Supplemental Education Services (SES), offered outside of the regular school day, that align with district content standards and instruction, and must provide parents with information on the availability of Supplemental Education Services, the identity of approved service providers, and, at a minimum, a brief description of the services, qualifications, and demonstrated effectiveness of each provider. While school districts are to pay the per pupil allocation for services provided, districts are not required to provide transportation for Supplemental Education Services. A school district with schools identified for Supplemental Education Services, must set aside an equivalent of 20% of the LEA Title I allocation as follows: 5% for school choice, unless parent demand for school choice transportation can be met with less; 5% for Supplemental Education Services; and the remaining 10% available for Supplemental Education Services and/or school choice as need demands.

Parents choose the SSP for their children from among the providers approved by the State for their school district.

A private provider, the school district unless identified in need of improvement, schools from within the LEA that are not identified as SINA, and area education agencies may be approved to provide Supplemental Education Services. Supplemental Education Service providers must ensure that instruction is research based, of high quality and is consistent with local standards. SSPs must provide academic assistance to students outside of the regular school day; work collaboratively with the school district, principals, and parents, and provide written feedback to the parents and school district regarding student progress. To be on the approved list of State Supplemental Education Service providers, SSPs must meet all applicable federal, state and local health, safety and civil rights laws. *The Application for Supplemental Education Service Providers* can be found on the Iowa Department of Education web site at educateiowa.gov/index.php?option=com_content&view=article&id=1635&catid=497&itemid=2441. You will find the SES
Providers Application under the SES Provider Information section. The site will also provide a SES toolkit, a listing of current SES providers, a code of ethics for SES providers and a presentation covering the federal requirements for SES implementation within school districts with schools in need of assistance. For additional information regarding supplemental education service providers, contact Susan Selby at the Title I office at 515/281-4732 or susan.selby@iowa.gov.

**TEACHER LOAN CANCELLATION**

The SEA has the responsibility of annually compiling a listing of Iowa low-income schools that becomes part of a national online directory of low-income schools for the purpose of providing teacher student loan cancellation or forgiveness for borrowers of Federal Stafford Loans, William D. Ford Direct Subsidized and Unsubsidized Loans, Federal Consolidation and Direct Consolidation Loans, and Federal Perkins Loans. To be eligible to be listed, the LEA must be eligible for Title I funding and the low-income percentage for the attendance center must exceed 30 percent. The source for the low-income information is free and reduced eligible meal student data. The schools with a low-income percentage exceeding 30% in the current school year will provide full-time teachers the opportunity to apply for loan cancellation benefits. The actual benefits vary by individual circumstances. To apply for loan cancellation benefits, request the appropriate application from the office that administers the loan program at the college or university that holds the loan. The State listing for the coming school year is submitted annually and is normally published online sometime in December. To verify the eligibility of a school within the state of Iowa, contact Geri McMahon at 515/281-3944 or geri.mcmahon@iowa.gov.

The national directory may be searched at [www.tcli.ed.gov](http://www.tcli.ed.gov).

The Iowa Department of Education annually designates “teacher shortage areas” for the State. Educators teaching full-time in a designated teacher shortage discipline may be eligible for up to three years of deferment on Stafford Student Loan and/or Supplemental Loans for Students (SLS). The teacher shortage areas and information regarding the deferment process are available at [www.iowa.gov/educate](http://www.iowa.gov/educate). Educators teaching in these shortage areas may also qualify for cancellation benefits under the Federal Perkins Loan Program. Refer to the U.S. Department of Education web site for more information ([www.studentaid.ed.gov](http://www.studentaid.ed.gov)).

A change to the Teacher Loan Program in 2005 authorized up to $17,500 in loan forgiveness to eligible highly qualified math, science and special education teachers through the Taxpayer-Teacher Protection Act (P.L. 108-409). This increase above the previous loan limits is meant to ease the shortage of teachers in key subject areas. The additional loan forgiveness will provide substantial relief for existing teachers and an incentive for prospective teachers to teach in subjects and schools that have difficulty hiring highly qualified candidates. For detailed information on the program and to find out if you qualify for the loan forgiveness, call the Federal Student Aid Customer Service hotline at 1-800/433-7327. More information on the loan forgiveness limits is posted at [www.ifap.ed.gov/dpcletters/GEN0414.html](http://www.ifap.ed.gov/dpcletters/GEN0414.html).

The state of Iowa also offers cancellation benefits to teachers. The Iowa College Student Aid Commission (ICSAC) is an excellent resource regarding loan cancellation benefits for educators. The web site is [www.iowacollegeaid.gov](http://www.iowacollegeaid.gov) and provides a wide variety of assistance and information as well as an eligibility flowchart, applications and links to other sources educators will find helpful. The ICSAS can be contacted by phone at 1-877/272-4456 or email at info@iowacollegeaid.gov.

The Teacher Career Establishment Grant helps new classroom teachers in state-designated subject shortage areas. Each recipient will be awarded up to $2,000 to help with the costs related to establishing a new career. Go to [www.studentloan.org](http://www.studentloan.org) for an application and more details. Iowa Student Loan can be contacted by phone at 1-800/243-7552, ext. 7656 or 515/273-7656 or email to mbrown@studentloan.org.

**TITLE I PARENTAL INVOLVEMENT**

Section 1118, of the *No Child Left Behind Act of 2001* requires each district and school with a Title I program to have a parent involvement policy that is jointly developed, agreed upon, and distributed to parents of participating children. This policy must be on file in the district, but need not be approved by the school board. The parent involvement policy must be reviewed annually and plans for its review must be included in the Comprehensive School Improvement Plan (CSIP), which is part of C-Plan. An annual Title I parent meeting must be held at a convenient time. A parent compact must be provided to every parent in a schoolwide program building and to Title I parents in targeted assistance program schools. The law does not require a parent signature; however, effort should be made to encourage parents to sign the compact.
Although sample documents are included in the Guidance section of this document, schools are encouraged to create compacts that are useful to them and reflect the beliefs of the school and community.

For the 2014-2015 school year, local parent policies and compacts must be reviewed, updated and uploaded to the Title I application for review. The parent involvement policy must incorporate all required components, include parents in the review process, and be labeled “Reviewed and Updated for the 2014-2015 School Year.” The parent involvement policy and parent-school compact is due no later than September 15. Final approval of the local Title I application is conditional upon the receipt of these documents.

Title I funds may be used for activities associated with Parent Involvement. LEAs receiving allocations of $500,000 or more must reserve and spend 1 percent of the allocation for parent involvement activities, including family literacy and parenting skills. At least 95 percent of the 1 percent reservation must be allocated by formula to Title I funded schools. This reservation needs to be conducted separately from Title I building level allocations. If the district serves private school students, LEAs must correctly calculate and provide for equitable services for private school students regarding parental involvement requirements. The parent involvement requirement can be met either through independent parent involvement activities or in conjunction with the LEA’s activities. If they are done independently, there must be an equitable distribution of funds for these activities. The LEA is required to document on the General Budget detail form expenditure totals to reflect the situation in their district. If applicable, the 1 percent reservation must be included in the general budget before approval will be given to the district application. To remain in full compliance, the required 1% set-aside for parent involvement must be spent during the current school year. Note: The district should have on file the background information for this budget detail expenditure, but is not be required to include this on the electronic application itself. For example:

Parental Involvement Reservation under Section 1118 of ESEA

In participating public school attendance areas:

No. of private school children from low-income families
Total no. of children from low-income families

Proportion of Reservation divided by

Reservation

Proportion of Reservation Reservation for Equitable Services

X $ = $

In general, parent involvement refers to strategies intended to increase the involvement and contributions, in both school-based and home-based settings, of parents that are designed to support classroom instruction and increase student achievement. Title I places considerable emphasis on parent involvement. Section 1118 of the Title I statute contains many provisions concerning an LEA’s responsibilities for carrying out parent involvement activities. Research shows that parental involvement in the education of the child is a critical factor in improving academic achievement. If a child is to attain and maintain grade level proficiency and achieve high academic standards, parents must support their child’s learning.

Parent involvement is more than just surveying parents or bringing them together for a meeting to listen—they also must be given opportunities for meaningful participation and active involvement. Parent involvement activities must be designed and implemented to meet the needs of the parents—not the needs of the LEA. Parents should receive training and materials to help them work with their child to improve academic achievement.

Examples of mechanisms that can encourage parental involvement include the following:

- Establishment of organized parent groups.
- Holding public meetings involving parents to review school performance and help develop school improvement plans.
- Using surveys to gauge parent satisfaction and support for the school.
- Implementing complaint procedures for parents.
- Coordinating with local social and health service providers to help meet family needs.
- Parent education classes (including GED, adult literacy, and ESL programs).

IowaParents.org, a joint effort between the School Administrators of Iowa (SAI), the Iowa Department of Education (DE), and Area Education Agency 267 (AEA 267), provides Iowa Statewide Parent Information Resource Center (Iowa PIRC) to promote student success. This web site (http://www.iowaparents.org) is designed to provide information and support to a wide-range of parents and educators throughout Iowa.
Local education agencies may find guidance on meeting the parent involvement requirements under Title I Part A on the DE website at http://educateiowa.gov.

**Waivers, Title I, Part A**

The Iowa Department of Education has received permission from the US Department of Education to grant waivers to Iowa’s local school districts. Local school districts may now apply for the waivers directly from the Iowa Department of Education. Information regarding the LEA waiver application process is available on the Iowa Department of Education website (www.iowa.gov/educate) under Title I, Part A. Sample letters for each waiver request are provided there.

LEAs interested in applying for any waiver should "personalize" the waiver letter and submit on district letterhead. Forward the waiver application letter to ruth.jones@iowa.gov or the address on the letter by November 16, 2013.

**Web Site References For Title I Related Topics**

- CSIP web-based application
  https://portal.ed.iowa.gov

- Designing Schoolwide Programs
  www2.ed.gov/policy/elsec/uid/designingswp guid.doc

- Homeless Education under the McKinney-Vento Homeless Assistance Act

- Identifying Eligible Title I Schools and Attendance Areas
  www2.ed.gov/programs/titleiparta/wdag.doc

- Indirect Cost Rates

- LEA and School Improvement
  www2.ed.gov/policy/elsec/uid/schoolimprovement guid.doc

- Low-income schools Directory (Teacher loan cancellation)
  https://www.tcli.ed.gov/CBSWebApp/tcli

- NCLB Policy Guidance
  www2.ed.gov/policy/elsec/leg/esea02/index.html

- Para educators/Paraprofessionals
  educateiowa.gov/index.php?option=com_content&task=view&id=773&Itemid=1297

- Parental Involvement: Title I
  www2.ed.gov/programs/titleiparta/parentinvguid.doc

- Private School Toolkit
  www2.ed.gov/programs/titleiparta/ps/titleitoolkit.pdf

- Public School Choice
  www2.ed.gov/programs/choice/index.html

- School Profiles
  http://www.iowaschoolprofiles.com

- Serving Preschool Children Under Title I, Non-Regulatory Guidance

- Supplemental Educational Service Guidance
Supplemental Education Service Providers

Teacher Shortage Areas
https://www.educateiowa.gov/teacher-shortage-areas

Title I Application
https://portal.ed.iowa.gov

Title I Information
https://www.educateiowa.gov/pk-12/title-programs/title-i/title-i-part

Title I Legislation
www2.ed.gov/programs/titleiparta/legislation.html

Title I Paraprofessional Guidance
www2.ed.gov/policy/elsec/guid/paraguidance.doc

Title I Part A Non-Regulatory Fiscal Guidance
www2.ed.gov/programs/titleiparta/fiscalguid.doc

Title I Program Evaluation
https://www.educateiowa.gov/pk-12/title-programs/title-i/title-i-part

Title I Services to Private School Children
www2.ed.gov/programs/titleiparta/psguidance.doc

United States Department of Education
www.ed.gov
Iowa Department of Education

**Title I Questions and Answers**

**Allocation of Title I Funds to School Attendance Areas and Schools**

Q. How does an LEA handle funds that are carried over from one year into the next when allocating funds to school attendance areas?

A. Although an LEA may not use carryover funds to provide services in an ineligible school, an LEA has considerable discretion in handling carryover funds. Some of these options include:

- Allow each school to retain its carryover funds for use in the subsequent year.
- Add carryover funds to the LEA’s subsequent year’s allocation and distribute to participating areas and schools in accordance with allocation procedures.
- Designate carryover funds for particular activities that could best benefit from additional funding. (e.g. parental involvement activities; schools with the highest concentrations of poverty.)

Regardless of the option an LEA elects, the LEA may not carry over more than 15 percent of its allocation from one year to the next. This percentage limitation does not apply to an LEA that receives an allocation of less than $50,000 under subpart 2 of Part A. A SEA may, once every three years, waive the percentage limitation if it determines that the request of an LEA is reasonable and necessary or if supplemental appropriations become available.

Q. May an LEA allocate a greater per-pupil amount, for example, to schoolwide program schools than to targeted assistance schools since schoolwide programs serve all children in the school?

A. The Title I statute requires allocations to be based on the total number of low-income children in a school attendance area or school. Therefore, poverty is the only factor on which an LEA may determine funding. In other words, an LEA may not allocate funds based on the instructional model, educational need, or any other non-poverty factor. Because Part A places the responsibility for selecting participants and designing programs on schools rather than on the LEA, the LEA will not necessarily be in a position to know in advance the instructional model or educational need when determining allocations.

Q. May an LEA reserve funds from its Part A allocation before distributing funds to school attendance areas?

A. Yes. Before allocating funds an LEA must reserve funds to—

- Provide services comparable to those provided to children in participating school attendance areas and schools to serve—
  - Children in local institutions for neglected children; and
  - Where appropriate—
    - Eligible homeless children who do not attend participating schools, including providing educationally related support services to children in shelters.
    - Children in local institutions for delinquent children.
    - Neglected and delinquent children in community day school programs.

- Meet the requirements for choice-related transportation and supplemental education services in Section 1116(b)(10) and 1116(e)(6) of the Title I statute unless the LEA meets these requirements with non-Title I funds. The Title I statute requires that, unless a lesser amount is needed, an LEA spend an amount equal to 20 percent of its Title I,
Part A allocation for this purpose. Of this amount, 5 percent must support choice-related transportation, 5 percent must support providing supplemental education services, and the remaining 10 percent may support the costs of providing either choice-related transportation or supplemental education services.

- Meet the professional development requirements of—
  -- Section 1116(c)(7)(A)(iii) of the Title I statute if the LEA has been identified for improvement. An LEA must reserve at least 10 percent of its Title I, Part A allocation for this purpose; and
  -- Section 1119 of the Title I statute to meet the needs of teachers who are not highly qualified. An LEA must reserve an amount for this purpose that ranges from at least 5 percent of its Title I, Part A allocation.

- Meet the requirements for parent involvement. An LEA that receives more than $500,000 under Title I, Part A subpart 2 must spend at least 1 percent of its allocation for parental involvement activities. The LEA must distribute not less than 95 percent of the amount reserved for parent involvement to schools receiving Title I services.

- Administer Part A programs for public and private school children, including special capital expenses, if any, incurred in providing services to eligible private school children such as—
  -- the purchase and lease of real and personal property (including mobile educational units and neutral sites);
  -- insurance and maintenance costs;
  -- transportation; and
  -- other comparable goods and services, including non-instructional computer technicians.

- Conduct other authorized activities such as preschool programs, summer school and intercession programs, additional professional development, school improvement, and coordinated services.

Because the reservation of funds by an LEA will reduce the funds available for distribution to participating areas and schools, the LEA must consult with teachers, pupil services personnel (where appropriate), principals, and parents of children in participating schools in determining, as part of its LEA plan, what reservations are needed. This issue must also be part of the consultation with private school officials before an LEA makes any decisions that affect the opportunities of eligible private school children to participate in Part A programs.

An LEA must also ensure that it provides equitable services to private school children from Title I funds reserved "off the top" for district-wide instructional programs.

Q. Is there a maximum amount that an LEA may reserve?

A. No. An LEA must bear in mind, however, that the goal of Part A is to enable participating children to make adequate progress toward meeting the challenging student achievement standards that all children are expected to meet.

Q. How do funds that an LEA transfers into Part A of Title I under the transferability provision in Section 6123 of ESEA affect the specific percentages an LEA must reserve for choice-related transportation and supplemental education services, professional development, and parent involvement?

A. If an LEA transfers funds from another federal education program into Title I, Part A under the transferability provision in Section 6123, then the additional amount transferred is added to the LEA’s Title I, Part A allocation, and the combined amount becomes the base for calculating the specific reserves required for choice-related transportation and supplemental education services, professional development, and parent involvement.

Q. How may an LEA reserve funds for activities such as parental involvement and professional development?

A. An LEA may reserve funds at the LEA level for activities such as parental involvement and professional development or the LEA may require its Title I schools to carry out these activities from their allocations. For example, an LEA that is required to spend at least 1 percent of its allocation for parental involvement activities may reserve the full 1 percent from its Part A allocation, require each school to spend a requisite amount from its Part A allocation, or use a combination of these approaches.
Q. May an LEA consider variations in personnel costs, such as seniority pay differentials or fringe benefit differentials, as LEA-wide administrative costs, rather than as part of the funds allocated to school attendance areas?

A. Yes, this is an allowable option for the LEA. The statute requires that Part A funds be allocated to school attendance areas and schools on the basis of the number of children from low-income families in each area or school. This provision assumes, for example, that two schools with the same number of low-income children need similar amounts of funds to provide comparable educational programs to participating children. An inequity may occur, however, if schools with similar allocations offering similar instructional programs need to spend different amounts because of the salary and fringe benefit costs of the staff providing the instruction. To address this situation, an LEA may consider variations in personnel costs, such as seniority pay differentials or fringe benefit differentials, as LEA-wide administrative costs, rather than as part of the funds allocated to school attendance areas or schools. The LEA would pay the differential salary and fringe benefit costs from its administrative funds taken off the top of the LEA’s allocation. This policy would have to be applied consistently to staff serving both public and private school children throughout the LEA.

Q. Is there any flexibility in how an LEA may count children from low-income families in middle and high schools?

A. Of the four measures of poverty the statute permits an LEA to use for identifying eligible school attendance areas and allocating funds to those areas, eligibility for free or reduced-price lunch is by far the measure most frequently used. Yet, we know from experience that high school and middle school students are less likely to participate in free and reduced-price lunch programs than are elementary school students. Hence, those schools often may not be identified as eligible for Title I services, or, if eligible, may not receive as high an allocation as their actual poverty rate would require. In order to address the situation, an LEA may use comparable data collected through alternative means such as a survey. Also, an LEA may use the “feeder pattern” concept. This concept allows the LEA to project the number of low-income children in a middle school or high school based on the average poverty rate of the elementary school attendance areas that feed into that school.

When an LEA elects to use the feeder pattern, the LEA determines the district-wide average of poverty based on all of the schools for which the district is using actual poverty data; and uses this district-wide average to rank all of the attendance areas or schools in the LEA. If an LEA serves attendance areas or schools below a 35 percent poverty rate, the LEA’s allocation per low-income child must be based on the actual number of low-income children in the feeder schools, and the projected number in the feeder pattern receiving schools.

Q. How are funds made available to provide services to eligible private school children?

A. Title I continues the requirement that an LEA provide equitable services to eligible children enrolled in private schools. Section 1113[c] of Title I requires an LEA to allocate funds to a participating school attendance area or school on the basis of the total number of children from low-income families, including low-income children attending private schools. Thus, the LEA, in consultation with private school officials, must obtain the best available poverty data on private school children who reside in participating attendance areas. Because private school officials may have access to some sources of poverty information not easily accessible to public school officials, it is very important that public and private school officials cooperate in this effort. An LEA may count private school children from low-income families every year or every two years.

In collecting poverty data on private school children, the Title I statute gives an LEA flexibility to calculate the number of children who are from low-income families and attend private school. To obtain a count of private school children, an LEA may use:
2. The same poverty data it uses to count public school children.

4. Comparable poverty data from a survey of families of private school students that, to the extent possible, protects the families’ identity. The LEA may extrapolate data from the survey based on a representative sample if complete actual data are not available.

5. Comparable data from a different source, such as scholarship applications so long as the income level for both sources is generally the same.

5. Proportional data based on the poverty percentage of each public school attendance area applied to the total number of private school children who reside in that area.

6. An equated measure of low income correlated with a measure of low income used to count public school children.

Although funds are allocated based on the number of low-income children, private school children eligible to be served are children who reside in a participating public school attendance area and who are failing, or most at risk of failing, to meet student academic achievement standards based on the criteria in Section 1115(b) of the Title I statute. To provide equitable services to eligible private school children, an LEA must reserve the amounts generated by low-income private school children who reside in participating public school attendance areas. In consultation with private school officials, an LEA may choose one, or a combination of, the following options for using the funds reserved for private school children:

- Provide equitable services to eligible children in each private school with the funds generated by children from low-income families who reside in participating public school attendance areas and who attend that private school.
- Combine the funds generated by low-income private school children in all participating areas to create a pool of funds from which the LEA provides equitable services to eligible private school children who reside in participating public school attendance areas and are in the greatest educational need of those services. Under this option, the services provided to eligible children in a particular private school are not dependent upon the amount of funds generated by low-income children in the school.

**CARRYOVER FUNDS PROVISIONS**

Q. What actions must a SEA take with respect to an LEA that exceeds the 15 percent carryover limitation?

A. Unless it grants the LEA a waiver of the carryover limitation, a SEA must reduce that LEA’s allocation by the exact amount it exceeds its 15 percent carryover limitation.

Q. On what amount is the 15 percent limitation on carryover based?

A. The percentage limitation is applied to the amount allocated to the LEA for Title I, Part A under Subpart 2 for the current year. It does not include carryover funds from the preceding year, excess funds that the SEA reallocated to the LEA under Section 1126(c) of Title I, school improvement funds received under Section 1003, or funds received under the State Academic Achievement Awards program.

Q. Does an LEA include funds carried over from the previous fiscal year in the current year’s allocation base to determine statutory reservations?

A. No. Title I of the ESEA requires an LEA to reserve certain percentages of its Title I allocation for specific purposes. For example, under Section 1118(a)(3), an LEA must generally reserve at least one percent of its allocation for parent involvement activities. The base for calculating any of the reserves required under Title I is only the current year amount allocated to the LEA for Title I, Part A under Subpart 2. The LEA would not include carryover funds from the preceding year when determining current year reservations.

Q. May a SEA waive the 15 percent limitation on carryover funds?

A. Yes. Section 1127(b) of Title I provides that a SEA may, once every three years, waive the 15 percent carryover limitation if--

- The SEA determines that the request of an LEA is reasonable and necessary; or
- Supplemental appropriations for Title I, Part A become available.

**Q. Does the percentage limitation on carryover funds apply to all LEAs?**

**A.** No. The percentage limitation does not apply to an LEA that receives an allocation of less than $50,000 in Title I, Part A, Subpart 2 funds.

**Q. What happens to excess funds carried over by an LEA?**

**A.** If an LEA does not have a waiver of the carryover limitation, the excess funds become available to the SEA to reallocate to other LEAs in accordance with the criteria it has established under Section 1126(c) of Title I.

**Q. Does the carryover limitation apply to school improvement funds an LEA may receive from the four percent a SEA reserves under Section 1003 of Title I?**

**A.** No. The carryover limitation applies only to funds an LEA is allocated under Subpart 2 of Title I, Part A.

**Q. How does the carryover provision apply to equitable services to private school children?**

**A.** In general, if an LEA provided equitable services for private school students in the first year, any carryover funds would be considered additional funds for the entire Title I program in the subsequent year and would be part of the LEA’s Title I resource base in the next year. Those funds would be used, along with any other carryover funds, for serving both public and private school students on an equitable basis. This situation might occur, for example, if private school students did not fully participate in the Federal program in the first year, even though an equitable program was planned and offered for those students.

However, there may be a circumstance in which equitable services were not provided. For example, there was a delay by an LEA in implementing an equitable program for private school children because of consultation and notification issues between private school officials and the LEA. As a result, the LEA could not spend all the funds it had available for providing equitable services to private school children and needed to carry over those funds and use them to provide services to private school children in the following year. These carryover funds would be in addition to funds that the LEA would otherwise be required to use to provide equitable services for private school students out of the LEA’s current year allocation.

Under either situation, the LEA retains control of the Federal funds carried over into the following year. No funds are provided directly to private schools.

**Comparability**

**Q. Must an LEA determine comparability every year?**

**A.** Yes. Demonstrating comparability is a prerequisite for receiving Title I funds. Because Title I allocations are made annually, comparability is an annual requirement.

**Q. When should comparability be determined?**

**A.** The comparability process must enable an LEA to identify, and correct during the current school year, instances in which it has non-comparable schools. An early determination of comparability would allow an LEA to make adjustments with the least amount of disruption.

**Q. Are all LEAs required to make comparability determinations?**

**A.** No. The SEA will notify LEAs that are required to complete comparability determinations.

**Consolidating Funds in Schoolwide Programs**

**Q. Which Federal education program funds may be consolidated in a schoolwide program?**
A. A schoolwide program school may consolidate funds from any federal education program whose funds can be used to carry out activities in a public elementary or secondary school including services, materials, and equipment purchased with those funds and provided to a schoolwide program school.

A school that operates a schoolwide program may **NOT** consolidate Reading First (Title I, Part B, Subpart 1) funds, which establishes reading programs for students in kindergarten through grade 3.

Consistent with Section 1306(b)(4) of Title I, before a school operating as a schoolwide program consolidates funds received under Part C of Title I, ESEA for the education of migratory children, the school, in consultation with parents of migratory children or organizations representing those parents, or both, must first meet the unique educational needs of migratory students that result from the effects of their migratory lifestyle and those other needs that are necessary to permit those students to participate effectively in school, and must document that these needs have been met.

**Q.** May a schoolwide program school consolidate funds it receives under the Individuals with Disabilities Education Act (IDEA)?

**A.** Yes. A school that operates as a schoolwide program may consolidate funds received under Part B of IDEA. However, the amount of funds consolidated may not exceed the amount received by the LEA under Part B of IDEA for that fiscal year, divided by the number of children with disabilities in the jurisdiction of the LEA, and multiplied by the number of children with disabilities participating in the schoolwide program. A school that consolidates funds under Part B of IDEA may use those funds in its schoolwide program for any activities under its schoolwide program plan but must comply with all other requirements of Part B of IDEA to the same extent it would if it did not consolidate funds under Part B of IDEA in the schoolwide program.

**Q.** May a schoolwide program school consolidate funds it receives from discretionary grant programs?

**A.** In general, a schoolwide program school may consolidate funds it receives from discretionary (competitive) grants as well as from formula grants, except for Reading First. However, if a school operating a schoolwide program consolidates funds from discretionary grant programs, the school must still carry out the activities described in the application under which the funds were awarded. Although not required, it is preferable that the applicant LEA or school indicates in its application for discretionary funds that some or all of the funds would be used to support a schoolwide program and describe its activities in a schoolwide program school. A schoolwide program school would not need to account separately for specific expenditures of the consolidated federal funds.

**Q.** How may a school that is operating a schoolwide program meet the intent and purposes of the programs for which it consolidates funds?

**A.** A school that consolidates and uses, in a schoolwide program, funds from any other federal education program, except Reading First, is not required to meet most statutory or regulatory requirements of the program applicable at the school level, but must meet the intent and purposes of that program to ensure that the needs of the intended beneficiaries are met. The school must be able to demonstrate that its schoolwide program contains sufficient resources and activities to reasonably address the intent of the included programs, particularly as they relate to the lowest-performing students.

**Q.** What fiscal record-keeping requirements apply to an LEA or a school with respect to federal funds that are consolidated in a schoolwide program?

**A.** A school operating a schoolwide program that consolidates in a single account and uses, in a schoolwide program, funds from other federal education programs, except Reading First, is not required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those program funds. The school must, however, maintain records that demonstrate that the schoolwide program, considered as a whole, addresses the intent and purposes of each of the federal education programs whose funds were consolidated to support it.

An LEA must be able to show the amount of funds from each federal education program for each grant year that was consolidated in the single schoolwide program account the LEA allocated to a schoolwide program school and may use any reasonable method to demonstrate how the federal
funds in that schoolwide program have been expended. For example, the LEA could allocate expenditures of federal funds consolidated in a schoolwide program school in proportion to the amount of funds allocated to the school under each federal program.

Q. May a SEA require an LEA to account separately for each federal program whose funds are consolidated in a schoolwide program?

A. According to Section 1114(a)(3)(C), a schoolwide program is not required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those particular funds. However, a SEA has the authority to establish necessary accounting procedures to ensure proper use of federal program funds.

HOLD-HARMLESS PROVISIONS

Q. If an LEA loses eligibility for any of the four Title I Part A grants in 2009-2010, does the hold-harmless provision apply?

A. All four funding formulas provide for a variable hold-harmless guarantee for each LEA of 85, 90, and 95% of the previous year’s allocation. The hold-harmless percentage depends on the formula child rate of each LEA.

- To be eligible for a basic grant, an LEA must have at least 10 formula children and the number of formula children must be greater than two percent of the LEA’s school-age population.
- To be eligible for concentration grants an LEA must have more than 6,500 formula children or the number of formula children must exceed 15 percent of the LEA's school-age population.
- To be eligible for targeted grants, the number of formula children counted in an LEA for basic grant purposes must be at least 10 and equal or exceed 5% of the LEA’s total school-age population. In addition, the funding formula adjusts the number of formula children to give greater weight to those LEAs that have higher numbers or percentages of formula children.
- The eligibility criteria used to determine whether an LEA qualifies for an education finance incentive grant (EFIG) allocation are the same as for targeted grants. The State’s EFIG is allocated to LEAs using a weighted formula similar to the targeted grants formula. For Basic, Targeted, and EFIG, an LEA must meet the eligibility criteria in order for hold-harmless protection to apply. For Concentration Grants under NCLB, the hold-harmless provision applies to an LEA for four consecutive years even if the LEA no longer meets the eligibility criteria. However, for all Title I Part A grants, the hold-harmless provision only applies as far as funding is available.

Q. Is there an LEA hold-harmless provision for Concentration Grant funds?

A. Yes, the hold-harmless provision applies to an LEA for four consecutive years even if the LEA no longer meets the eligibility criteria. However, Title I law specifies that if appropriations are insufficient to fully fund all Title I entitlements in any given year, grants will be ratably reduced.

Q. Is an LEA that received Title I, Part D, Subpart 2 funds in 2010-2011 entitled to receive a hold-harmless allocation for 2011-2012?

A. No. The hold-harmless provisions of Title I, Part A do not apply to subgrants received by LEAs under Part D, Subpart 2.

LEA IDENTIFICATION AND SELECTION OF SCHOOL ATTENDANCE AREAS

Q. If an LEA applies the “35 percent rule,” must all school attendance areas with at least 35 percent poverty be served?

A. No. However, school attendance areas to be served must be selected in rank order.

Q. Section 1113(b)(1)(D)(ii) allows an LEA to skip an eligible school attendance area or school that has a higher percentage of poverty if the attendance area or school is receiving supplemental funds from other state or
local sources that are “spent according to the requirements of Section 1114 or 1115.” What is meant by “according to the requirements of Section 1114 or 1115?”

A. Under Title I regulations, a supplemental state or local program meets the requirements of Section 1114 if the program:
   - Is implemented in a school that meets the minimum 40 percent poverty threshold required to operate a schoolwide program;
   - Is designed to promote schoolwide reform and upgrade the entire educational operation of the school to support students in their achievement toward meeting the challenging academic achievement standards that all students are expected to meet;
   - Is designed to meet the educational needs of all children in the school, particularly the needs of children who are failing, or most at risk of failing, to meet the challenging student academic achievement standards; and
   - Uses the State’s assessment system described in the Title I regulations to review the effectiveness of the program.

A supplemental state or local program meets the requirements of Section 1115 if the program:
   - Serves only children who are failing, or most at risk of failing, to meet the challenging student academic achievement standards;
   - Provides supplementary services designed to meet the special educational needs of the children who are participating in the program to support their achievement toward meeting the challenging student academic achievement standards; and
   - Uses the State’s assessment system described in the Title I regulations to review the effectiveness of the program.

Q. How may preschool children be served under Part A?

A. There are several ways in which preschool children may be served under Part A. For example—
   - A participating school may use part of its Part A funds to operate a preschool program.
   - An LEA may reserve an amount from the LEA’s total allocation to operate a Part A preschool program for eligible children in the district as a whole or for a portion of the district.

Children served in the Title I preschool program must qualify educationally. To be eligible, preschool children—like school-aged children—must be failing, or most at risk of failing, to meet the local school district’s performance standards. Preschool children may be selected for Title I services on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures. Children who participate in a Head Start or Even Start program at any time in the two preceding years are automatically eligible for Title I services.

LOCAL NEGLECTED CHILDREN

Q. If an LEA is unable or unwilling to provide services to children in local institutions for neglected children, may it retain the funds that were allocated on the basis of these children?

A. No. If an LEA is unwilling or unable to provide services to neglected children, the SEA must reduce the LEA’s allocation by the amount generated by the neglected children.

Q. May the SEA transfer these funds to another LEA?

A. Yes. These funds may be assigned to another state agency or LEA that agrees to assume educational responsibility for the neglected children.

Q. May the SEA retain these funds?

A. Yes. If the SEA assumes educational responsibility for the neglected children, it is entitled to the funds generated by these children.

Q. If neither the SEA nor another agency is willing to assume educational responsibility for neglected children, what happens to the funds?

A. The SEA must reduce the LEA’s allocation by the amount that was based on neglected children. These funds would lapse and not be available for reallocation to other LEAs.
Q. If an institution closes and the children are transferred to an institution in another LEA, must the SEA transfer the funds to the LEA in which the children now reside?

A. Yes. The SEA must adjust the allocations of the two LEAs to reflect the transfer.

**MAINTENANCE OF EFFORT**

Q. When a SEA determines maintenance of effort for its LEAs, must the SEA use the same measure for all its LEAs?

A. No. For example, a SEA must determine maintenance of effort using the measure most favorable to each LEA. An LEA has maintained fiscal effort if it meets either of the two tests—aggregate expenditures or expenditures per pupil.

**PARENT INVOLVEMENT**

Q. Is the Parent Involvement requirement of Title I the same for both Targeted Assistance Programs and Schoolwide Programs?

A. Yes. The No Child Left Behind Act of 2001 requires that parents are involved in the development of the local LEA’s plan for Title I. Other requirements include the following:
1. A written parent involvement policy.
2. A school-parent compact for each participating building. For a schoolwide program, all students would be included.
3. A parent meeting must be held annually.
4. LEAs receiving allocations of $500,000 or more must budget at least 1% to support parent involvement activities that may include family literacy and parenting skills.

**PRIVATE SCHOOL SERVICES - CONTACTS AND ACTIVITIES IN PRIVATE SCHOOLS**

Q. Is it permissible for Title I teachers to use private school facilities other than the Title I classroom, such as the restroom, teachers’ lounge, cafeteria, or the parking lot?

A. Yes. There is no prohibition against reasonable use of private school facilities by a Title I teacher or other Title I personnel.

Q. May Title I teachers and other public school personnel meet or have discussions with private school teachers and administrators?

A. Yes. Consultation and communication are essential to implementing an effective Title I program. Therefore, Title I personnel may have necessary discussions or meetings with private school officials concerning the design and development of the Title I program, as well as communications concerning the needs and progress of individual children. (For the Title I requirements regarding consultation with private school officials, see section 1120(b) of the Title I statute.)

**PRIVATE SCHOOL SERVICES - LOCATIONS AND TYPES OF SERVICES**

Q. Do Title I services have to be provided in private schools?

A. No. However, LEAs are required to provide Title I services for private school children that are equitable in comparison to the services and other benefits provided for public school participants and to consult with private school officials on important issues such as the location of any services.

Q. May Title I instructional services be provided in private schools before and after regular school hours and during the summer?
A. Yes. These are additional, permissible options for providing services for private school children so long as the equitability and consultation requirements are met. In fact, the Title I statute requires, with respect to public and private school children, that LEAs use effective instructional strategies that give "primary consideration to providing extended learning time." These options may be useful particularly in situations where there is no space available in the private school during the regular school day.

Q. Do Title I services for private school children need to be in the same subject areas or grade levels as public school students?

A. No. The needs of the private school children determine what Title I service is appropriate. However, because eligibility for services is determined by residence in a participating public school attendance area, private school students being served need to reside in an eligible participating public school attendance area. Therefore, for example, if a public middle school attendance area is not participating in Title I, Title I service may not be provided to private school students in middle school grades who reside in the area.

Q. Does space used in private schools for Title I instruction need to be free of any religious symbols?

A. In its decision in Agostini, in ruling that Title I instructional services can be provided in private schools, the Court relied on the safeguards in New York City's pre-Aguilar program, including the fact that the Title I services were provided in space that had no religious symbols. While the Supreme Court did not specifically indicate whether the removal of religious symbols was required, it is a significant factor a Court is likely to take into account in reviewing the constitutionality of services in private schools and LEAs are strongly encouraged to provide Title I instruction in space that is free of any religious symbols.

Q. May space used for Title I instruction in a private school be used for non-Title I purposes at other times?

A. Yes. The LEA should have the exclusive use and control of the Title I space during the time period in which Title I services are being conducted, but the space may be used for other purposes at other times.

Q. May Title I service be provided in the regular private school classrooms through aides or joint teaching efforts?

A. It is recommended that LEAs not provide these types of services. In holding that Title I instruction may be provided in private schools, the Court in Agostini emphasized that the Title I program was totally separate from the private school's educational program and under the sole control of the LEA. Providing Title I instruction as a part of private school classes raises significantly different issues that increase the risk that the services would be held unconstitutional.

Q. Are private schools required to make space available in their schools for Title I services?

A. No. If space is not available in a private school, or if the private school chooses not to make its facilities available to the LEA for this purpose, Title I services have to be provided in another location. The LEA still has the responsibility of providing equitable Title I services for private school children under these circumstances, although the services would be at a location outside the private school. The extra costs of providing services at a location outside the private school would be taken "off-the-top" of the LEA’s Title I allocation before funds are allocated for instructional services for public and private school children.

PRIVATE SCHOOL SERVICES - NEW PRIVATE SCHOOL CHILDREN

Q. Can an LEA serve eligible private school children who previously declined Title I service?

A. Yes. An LEA may provide services to these children to the extent possible in the current school year, but the LEA will have met its responsibility to offer equitable services to private school children for the upcoming school year if it contacted representatives of these children on a timely basis in the normal course of designing the Title I program and services were declined. However, we strongly encourage these LEAs to contact representatives of these children to see what arrangements or modifications can be made for the upcoming school year and to make those adjustments unless it would seriously disrupt the already-planned program. With respect to future years, LEAs should make renewed efforts to contact representatives of private school children that may have declined services because they could not be provided in the private school.
PRIVATE SCHOOL SERVICES – “OFF-THE-TOP” REQUIREMENTS

Q. Does the “off-the-top” requirement apply?

A. Yes. Section 200.27 of the Title I regulations requires that LEAs reserve funds as are reasonable and necessary for certain purposes, including administration of programs for public and private school children, before funds are allocated to school attendance areas or schools. Therefore if an LEA continues to provide Title I services, these costs would come “off-the-top” of the LEA’s Title I allocation before funds are allocated for instructional services for public and private school children. The “off-the-top” costs of providing Title I services for private school children outside their own schools has been reduced greatly as a result of the Court’s decision in Agostini.

Q. Must an LEA ensure that equitable services to private school children are provided from Title I funds reserved “off-the-top” for district-wide instructional programs?

A. Yes. If an LEA reserves Title I funds “off-the-top” for district-wide instructional programs, the equitable services requirement applies. Section 200.64(a)(2)(i)(A) of the Title I regulations requires that, if an LEA reserves funds for instructional activities for public elementary or secondary school students at the district level, the LEA must provide equitable services to eligible private school children. The LEA bases equitable services from the reserved funds on the proportion of private school children from low-income families residing in participating public school attendance areas.

Q. How does an LEA determine the amount of funds to be used for parent involvement activities for parents of participating private school students?

A. Section 1118 of the Title I statute requires an LEA to reserve funds “off-the-top” of its Title I allocation to carry out required Title I parental involvement activities. Section 200.65 of the Title I regulations requires the LEA to calculate the amount of funds available for parental involvement activities from the reserved funds based on the proportion of private school children from low-income families residing in participating public school attendance areas.

Q. How does an LEA determine the amount of funds to be used for professional development activities for teachers of private school Title I participants?

A. If an LEA reserves funds under Section 1119 “off-the-top” of its Title I allocation for carrying out Title I professional development activities, the LEA must provide equitable services to teachers of private school participants from this set-aside. As required under Section 200.65 of the Title I regulations, an LEA calculates these equitable services from the reserved funds in the proportion to the number of private school children from low-income families residing in participating public school attendance areas. Activities for the teachers of private school participants must be planned and implemented with meaningful consultation with private school officials and teachers.

PRIVATE SCHOOL SERVICES - SCHOOLWIDE PROGRAMS

Q. Can schoolwide programs be operated in private schools?

A. No. Schoolwide programs may not be operated in private schools because private schools, as opposed to private school students, are not themselves eligible for Title I service.

REALLOCATION

Q. How does a SEA reallocate funds?

A. Section 1126[c] of Title I requires that a SEA reallocate Part A funds on a timely basis to LEAs in the State that need additional funds in accordance with criteria established by the SEA. Funds available for reallocation may include:

- Excess Part A funds available from an LEA that: (1) is eligible for a Title I allocation but has chosen not to participate in the Title I program; (2) has had its allocation reduced because it failed to meet the maintenance of effort requirements in Section 14501 of ESEA; (3) has carryover funds that exceed the 15 percent limitation in Section 1127 of Title I; or (4) has excess funds for other reasons; or
- Funds that a SEA has recovered after determining that an LEA has failed to spend Part A funds in accordance with the law.
**SUPPLEMENTAL EDUCATION SERVICES**

**Q. Do public school options include only schools in the same district?**

A. There may be situations where children in Title I schools have school options outside their own school district. For instance, an LEA may choose to enter into a cooperative agreement with another LEA that would allow their students to transfer into the other LEA’s schools. In fact, the law requires that an LEA try “to the extent practicable” to establish such an agreement in the event that all of its schools have been identified as needing improvement, corrective action or restructuring.

**Q. Is transportation available for children who exercise their right to attend another school?**

A. Subject to a funding cap established in the statute, LEAs must provide transportation for all students who exercise their school choice option under Title I and priority must be given to the lowest-achieving children from low-income families.

**Q. What are Supplemental Education Services?**

A. Supplemental Education Services are additional academic instruction designed to increase the academic achievement of students in schools that have not met state targets for increasing student achievement (adequate yearly progress) for three or more years. These services may include tutoring and after-school services. They may be offered through public or private sector providers that are approved by the state, such as public schools, public charter schools, local education agencies, educational service agencies and faith-based organizations. Private sector providers may be either nonprofit or for-profit entities. SEAs must maintain a list of approved providers across the state organized by the school district or districts they serve, from which parents may select. SEAs must also promote maximum participation by Supplemental Education Services providers to ensure that parents have as many choices as possible.

**Q. When are children eligible to receive Supplemental Education Services?**

A. Students from low-income families who remain in Title I schools that fail to meet state standards for at least three years are eligible to receive supplemental education services.

**Q. Are parents notified about Supplemental Education Services?**

A. Yes. LEAs are required to provide annual notice to parents of eligible children about the availability of services and information on the approved providers.

**Q. Can parents choose providers for tutoring and other Supplemental Education Services?**

A. Yes, parents of eligible children can choose from the list of State-approved providers. Most states have approved a diverse list of providers. Upon request, the LEA will help parents determine which provider would best fit their child's needs. When parents have made their selection, the LEA must then contract with that provider to deliver the services.

**Q. What action can parents take if their child is eligible for tutoring or other Supplemental Education Services, but their school or LEA does not offer them?**

A. LEAs receiving Title I funds must offer free tutoring and other extra help to eligible students. If eligible students are not being offered these services, parents are encouraged to contact the state Title I office.

**Q. How are Supplemental Education Services providers held accountable?**

A. SEAs must develop and apply objective criteria for evaluating providers and monitor the quality of services that they offer. In addition, Supplemental Education Services providers must give to parents, as well as to the school, information on their children’s progress.

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**TITLE I FUNDED STAFF**

**Q. Is it allowable for a Title I funded teacher to substitute occasionally for elementary staff?**
A. The Federal guidance states that Title I paid personnel may—

“Assume limited duties that are assigned to similar personnel paid with other funds, including duties beyond classroom instruction or that do not benefit Title I participants, as long as the amount of time spent on the limited duties is the same proportion of total work time as that for similar personnel at the same school.”

Additionally it states, “The provision is not meant to result in Title I staff being assigned a disproportionate share of special duties at a school. In assigning Title I staff to such duties, a school and LEA should ensure that the Title I program in not harmed.”

To summarize, it is allowable if it is not on a regular basis, if Title I staff are treated the same as similarly situated personnel, and if it does not impair the Title I program.

Q. May a Title I funded teacher work with a small group mix of students in the regular classroom as part of our targeted assistance building’s new reading program?

A. As it is stated, no. Please remember that a targeted assistance school differs from a schoolwide in the following ways:

- Title I funds may be used in targeted assistance buildings only for programs that provide service to eligible children identified as having the greatest need for special service.
- Title I funds must be used for services that supplement, and do not supplant, the services that would be provided in the absence of Title I funds, from non-federal sources.

Records must be maintained that document that Title I funds are spent on activities and services for only Title I participating students.
Introduction

Among the new requirements of the Federal No Child Left Behind Act of 2001 is one that provides for “written procedures for the receipt and resolution of complaints alleging violations of law in administration” of the following programs:

- Title I, Part A (Improving Basic Programs Operated by Districts)
- Title I, Part C (Migrant Education)
- Title I, Part D (Neglected, Delinquent, At-Risk Children and Youth)
- Title II (Professional Development Program)
- Title III, Part A, Subpart 2 (School Technology Resources)
- Title VI (Innovative Education Program Strategies)
- Title VII, Part C (Emergency Immigrant Education)

Contents of a Complaint

A complaint must be in the form of an affidavit. That is, the parent/guardian’s signature must be notarized or the parent/guardian must use substantially the following form:

I certify under penalty of perjury and pursuant to the laws of the state of Iowa that the preceding is true and correct.

______________________________________________
Date Signature

The complaint must include all of the following:

1. A statement that an identified Iowa school district or the Iowa Department of Education (herein called “IDE”) has violated a requirement of federal law applicable to one of the above-named programs.
2. A statement identifying the sections(s) of federal law that is alleged to have been violated.
3. The facts on which the complaint is based.
4. Details of any discussions, meetings, or correspondence involving the parties regarding attempts to resolve the matter raised in the complaint.
5. Contact information regarding the individual who filed the complaint, which at a minimum must include the person’s mailing address and daytime phone number.
**Procedure for Filing a Complaint against a School District**

1. A complaint as defined above must be filed with the IDE within ninety (90) days of an adverse decision of the school district (administration or school board). For purposes of this process “filed” means mailed with a *postmark* within the 90 day period to the Division Administrator, ECESE, Iowa Department of Education, 2nd Floor – Grimes State Office Building, 400 East 14th Street, Des Moines, IA 50319-0146 or faxed within the 90 day period to the Division Administrator, ECESE, at 515/281-7700.

2. Within ten (10) days of receipt of a complaint, the Division Administrator shall notify the superintendent of the school district named in the complaint that a complaint has been filed. A copy of the complaint shall be provided to the school district with a directive to respond in writing to the complaint within twenty (20) days of notification. The district’s written response shall be signed by the superintendent or his/her designee. The original shall be provided to the Division Administrator with a copy sent to the individual who filed the complaint.

3. After receiving the district’s response, the Division Administrator shall determine whether further information is required, and may seek additional information from either party.

4. Unless, *in the sole discretion of the Division Administrator*, the Division Administrator determines that a hearing is necessary, the matter will be considered fully submitted to the Division Administrator in writing. If the Division Administrator determines that a hearing is necessary, the procedures in 218---IAC 6.12 shall apply.

5. Once the Division Administrator is satisfied that s/he has sufficient information to prepare a final report and decision, the Division Administrator shall issue a written decision to the parties. The decision may consist of one of the following options:
   a. Dismissal of the complaint for failure to state a complaint that meets the requirements of this process and the No Child Left Behind Act.
   b. A finding on the merits of the complaint that the district did not violate any provision of pertinent federal law.
   c. A finding on the merits of the complaint that the district did violate a provision of pertinent federal law, and a specific resolution of the complaint to be undertaken by the district.

The decision of the Division Administrator is *not* a final decision of the IDE, and therefore, is not subject to a petition for judicial review pursuant to Iowa Code chapter 17A. Nothing herein shall be construed to render this complaint process a “contested case” proceeding under that chapter.

6. Absent the existence of exceptional circumstances or the agreement of both parties to an extension, the decision of the Division Administrator shall be issued no later than ninety (90) days of the receipt by the Division Administrator.
7. When, in the sole discretion of the Division Administrator, s/he determines that public interest requires the same, the Division Administrator may utilize the provisions of any of the following administrative rules:
   281—IAC 6.7 (Disqualification)
   281—IAC 6.10 (Consolidation – Severance)
   281—IAC 6.19 (Default)

8. All time periods listed herein mean calendar days.

9. Either party may appeal the decision of the Division Administrator to the United States Secretary of Education.

**Procedure for Filing a Complaint against the Iowa Department of Education**

1. A complaint as defined above alleging that the IDE has violated a requirement of federal law applicable to one of the above-named programs must be filed with the IDE within ninety (90) days of an adverse decision of an employee or agent of the IDE.

2. All procedures for filing such complaint as apply to a complaint against a school district apply here, except that if the adverse decision is from the Administrator of the Early Childhood, Elementary and Secondary Education Division of the IDE, the complaint shall be filed with the Director of the IDE.

**School District Requirement**

All Iowa school districts shall provide a copy of this process, free of charge, to interested residents and parents of students both upon the request of the resident or parent and when the district has been working with the resident or parent to resolve a complaint. This process allows an individual to file a complaint alleging violations of law in administration of the following programs only:

- Title I, Part A (Improving Basic Programs Operated by Districts)
- Title I, Part C (Migrant Education)
- Title I, Part D (Neglected, Delinquent, At-Risk Children and Youth)
- Title II (Professional Development Program)
- Title III, Part A, Subpart 2 (School Technology Resources)
- Title VI (Innovative Education Program Strategies)
- Title VII, Part C (Emergency Immigrant Education)

There is no parallel complaint process for any program not listed above.
Complaint Resolution Process for Private School Programs

Improving the consultation process and opening the lines of communication should result in Title I programs that are designed to better meet the needs of the private school participants. Effective and ongoing consultation may deter formal complaints to the state education agency (SEA) by private school officials; however, private school officials have the right to complain to the SEA if they do not believe their eligible children, teachers, or families are receiving equitable services. Updated information about the complaint process may also be found on the Title I, Part A page of the Iowa Department of Education web site.

If the private school official does not believe that the local education agency (LEA) engaged in timely and meaningful consultation, or that the LEA did not give due consideration to the views of the private school official, or disputes the low-income data on private school children, or for another reason does not believe that the private school children are receiving fair and equitable Title I services, the private school official may file a complaint with the SEA. The decision of the SEA may be appealed to the U.S. Secretary of Education.

Under Title I, an LEA is required to provide to eligible private school children, their Title I teachers, and their families Title I services or other benefits that are equitable to those provided to eligible public school children, their Title I teachers, and their families. Private school officials have recourse through the complaint process if they do not believe their eligible children, Title I teachers, or families are receiving equitable services. Aspects of the complaint process that the private school officials should know:

- A private school official has a right to complain to the state education agency (SEA) that the LEA did not engage in a timely and meaningful consultation process or did not give due consideration to the views of the private school officials.
- Any dispute regarding the accuracy of low-income data for private school students also can be the subject of a complaint.
- The SEA is required to have complaint procedures in place as required by Sec. 34 CFR 299.10-12. Included in these procedures is a reasonable time by which the SEA must respond in writing to the complaint.
- No later than 30 days following the written response by the SEA, or in the event the SEA fails to resolve the complaint within a reasonable period of time, the private school official may appeal the decision of the SEA to the Secretary of the U.S. Department of Education. Such appeal must be accompanied by a copy of the SEA’s written response, if available, and a complete statement of the reasons supporting the appeal.
- The Secretary must complete an investigation of the complaint and resolve the appeal within 120 days after receipt of the appeal.

Please see the previous section, Complaint Resolution Process for NCLB Programs, for information regarding this process.
Iowa Department of Education

**LOCAL DELINQUENT APPLICATION**

CHILDREN LIVING IN LOCAL INSTITUTIONS FOR DELINQUENT CHILDREN

TITLE I, PART D of NCLB

Note: Complete these forms to apply for available local delinquent funds. The Delinquent Program application should reflect a composite look at all delinquent facilities covered by this application. Please complete the Delinquent Budget form for all delinquent facilities in your school district that will receive Title I funding.

For technical assistance with local delinquent education programs, contact the Title I Consultant for your particular AEA or Rick Bartosh at richard.bartosh@iowa.gov or 515/281-0368.

The local education agency is the fiscal agent for any funds designated to provide Title I service to children in local delinquent institutions. Applicant agencies that have received prior approval by the State Education Agency (SEA) as eligible to receive Part D of Title I funding must complete this application to receive those funds.

This application may be accessed through the Title I electronic Internet application at https://portal.ed.iowa.gov. The Iowa Department of Education Iowa Education Portal site will appear. On the blue navigation menu bar, highlight “A&A Account” and click on “Sign In.” On the “Sign In” tab, enter your Account ID (e-mail address) and password to sign into DOE – Education Portal. Click the “Sign In” button. The user should click on the Title I button to access the Title I application program forms. The due date for submission of the Title I electronic Internet application is September 15, 2014.

Completion of the Contacts, Project Staff Assignments, Delinquent Budget and Delinquent Narrative forms together with the Applicant Agency’s Title I Annual Application, Local Delinquent Agreement and the LEA’s Comprehensive School Improvement Plan of C-Plan, encompasses the basic requirements of the Title I legislation connected with the education of local delinquent children including assurances, lobbying and debarment, student data and budget.

**CONTACTS**

The user must complete the Contacts form with the local education agency official responsible for the local delinquent education program.

The prior year contact will be default to the Contacts form and the user may keep, delete or edit information by clicking on the appropriate button.

**DELINQUENT AGREEMENT**

A signed agreement between the LEA and the local delinquent facility must be kept on file at the district and a copy uploaded to the Title I application. This agreement must be reviewed annually. A sample agreement follows and is available at https://www.educateiowa.gov under
Title I Part D. The LEA is responsible for the annual evaluation of the local delinquent program. The user may click the **Upload** button and browse computer files for the delinquent agreement. Once the document is located and selected (double-click), click the **Upload** button to attach the agreement to the delinquent application. The user may ensure that the proper document has been uploaded by clicking the **View** button. If the uploaded document needs to be changed, click the **Re-Upload** button.

**Local Delinquent Agreement**

The _____ Community School District (CSD) and ________, a delinquent youth facility, agree to coordinate and support a PL 107-110 Title I, Part D, Subpart 2 program within the delinquent facility.

The _____ CSD will act as the fiscal agent and program monitor of the Title I program identified below.

The ____________ facility provides assurance and documentation, upon request, that the Title I, Part D, Subpart 2 funds are being used in one or more of the following ways:

6) For programs that serve children and youth returning to local schools from correctional facilities, to assist in the transition of such children and youth to the school environment and help them remain in school in order to complete their education;

7) For dropout prevention programs which serve at-risk children and youth, including pregnant and parenting teens, children and youth who have come in contact with the juvenile justice system, children and youth at least 1 year behind their expected grade level, migrant youth, immigrant youth, students with limited English proficiency, and gang members;

8) For the coordination of health and social services for such individuals if there is a likelihood that the provision of such services, including day care, drug and alcohol counseling, and mental health service, will improve the likelihood such individuals will complete their education;

9) For special programs to meet the unique academic needs of participating children and youth, including vocational and technical education, special education, career counseling, curriculum-based youth entrepreneurship education, and assistance in securing student loans or grants for postsecondary education; and

10) For programs providing mentoring and peer mediation.

The ____________ facility provides assurance and documentation, upon request, that the following services are being made available, when and where applicable, to neglected/delinquent residents at the facility:

10) Transition planning

11) Coordination of social, health, and other services

12) Business partnerships

13) Parental involvement

14) Coordination with federal, state, and local programs

15) Coordination with juvenile justice programs

16) Work with probation officers

17) Individualized education programs

18) Alternative placements

The _____ CSD shall evaluate the program and, where the number of students is sufficient, disaggregating data on participation by gender, race, ethnicity, and age, to determine the program's impact on the ability of participants —

1) To maintain and improve educational achievement;

2) To accrue school credits that meet State requirements for grade promotion and secondary school graduation;
3) To make the transition to a regular program or other education program operated by a local educational agency;
4) To complete secondary school (or secondary school equivalency requirements) and obtain employment after leaving the correctional facility or institution for neglected or delinquent children and youth; and
5) As appropriate, to participate in post-secondary education and job training programs.

The result of this evaluation shall be used to plan and improve subsequent programs for participating children and youth.

Describe how the services provided to any local delinquent facility with Title I local delinquent funding will be used to meet the transitional and academic needs of students so that they may return to local district or alternative education programs.

The ________ facility will provide the following service(s) using Title I, Part D, Subpart 2 funds:

3)
4)

(To be reviewed annually)

Authorized Signatures for LEA and facility and dates

The Delinquent Narratives form will be pre-populated with the name of each local delinquent facility within the local education agency receiving local delinquent funding for the current school year. When the user clicks the Upload button next to each facility name, you will be given access to browse your files for the above completed agreement. Once the document is located, click the Upload button to attach the agreement to the Title I application. This process will need to be repeated for each local delinquent facility listed on the Delinquent Narratives form. (The same agreement may be used if individual facilities operate under one parent organization.)

✔️ **TIP:** Consider typing the narrative responses into a word document, then cut and paste into the narrative boxes. Click Save often to save your changes.

Local delinquent funds may be spent in one of five different ways. **Describe** how the Title I local delinquent funds will be used to provide services at the local delinquent facility to meet the academic and transitional needs of students so that they may return to local district or alternative education programs. **Indicate “NA” in the narrative box if the local delinquent funds not used for the purpose given.**

Local neglected funds may be spent in one of five different ways. In each of the five narrative boxes, the user must **describe** how the Title I local neglected funds will be used to provide services at the local neglected facility to meet the academic and transitional needs of students so that they may return to local district or alternative education programs. Narratives should be reflective of services identified in the Agreement. As appropriate, **indicate “NA” in the narrative box if the local neglected funds are not used for the purpose stated.**

The five narrative questions are:
- Describe how the Title I local delinquent funds will be used to provide services at the local delinquent facility to assist children and youth in the facility to complete their education and/or transition services.
- Describe how the Title I local delinquent funds will be used to provide services at the local delinquent facility for dropout prevention.
- Describe how the Title I local delinquent funds will be used to provide health and social services at the local delinquent facility.
- Describe how the Title I local delinquent funds will be used to provide vocational and technical education, etc., at the local delinquent facility.
- Describe how the Title I local delinquent funds will be used to provide mentoring and peer mediation at the local delinquent facility.

Following the five narrative boxes, is a comment box where you may enter any comment you may have about the delinquent narrative.

**Delinquent Assurances**

Each correctional facility entering into an agreement with an LEA under Section 1423(2) to provide services to children and youth under Part D, Subpart 2 must review the 11 assurances noted at the bottom of the Delinquent Narrative screen and respond “Yes” or “No” to the statement: “The district assures that the above assurances have been met” before the district Title I application can be approved. Once the assurances statement has been answered, the user should click Finish.

Once the user clicks the Finish button, validation edits will run. Once all validation edits are passed, the user will be returned to the Delinquent Home screen and the status will be “District Finished” for the Delinquent Narratives form, which will have moved to the bottom of the Delinquent Program menu.

*Click Delinquent Budget from the Delinquent Program menu.*
Note: Please complete this budget to reflect the combined budgets of all delinquent facilities in your school district that will receive Title I funding.

Local Delinquent Education program funds require separate accounting. Do not include these figures in the Title I General Budget. Do not include local neglected funds on the local delinquent budget.

The Delinquent Budget form allows the user to enter the specific breakdown of Title I expenditures claimed on the budget and, if necessary, to provide a description of expenditures. Note: Do not attempt to enter any figures in the “Total” fields as the total is automatically calculated as you enter specific expenditure figures. Round all amounts to the nearest dollar. Be sure the total project budget amount applied for on the Delinquent Budget does not exceed the new Title I delinquent allocation as noted at the top of the Delinquent Budget form. This budget is to reflect only the portion of the Title I program that will be paid with Title I, Part D funds received by your LEA.
The budget table shown above has been collapsed. The Delinquent Budget form may be expanded by row by clicking at the far left of the row or in whole by clicking the **Expand All** button to reveal the regular expenditure categories. The directions provided for the General Budget form can be used to assist the user in completing the Delinquent Budget form. Explanation of the expenditure categories in the Local Delinquent Education Budget can be found under the General Budget form section of Title I Program guidance.

The Staff Assignments form is required when salary amounts are indicated in the budget. If a staff count is added to the Staff Assignments form, then staff salaries must be added to the budget; and conversely, if a staff salary is included in the budget, then a staff count must be added to the Staff Assignment form. **Note:** You are not required to report FTE on the budget form.

When all information has been entered on the Delinquent Budget form, the user may collapse the budget data to see an Expenditure Summary of total budget figures in each category by clicking the **Collapse All** button. The user may also collapse only certain budget rows by clicking at the far left of the budget table.

After all detail is completed, the user should click the **Finish** button. The user must fix all errors appearing in RED. The user must verify the YELLOW warning errors. A yellow highlight is simply a reminder to check your work.

✔️ **TIP:** Do NOT double-click the Finish button.

**Note:** If the indirect cost exceeds the maximum allowed for the salaries and benefits on the budget, a RED warning will be received and will need to be corrected prior to proceeding.

After all errors are corrected, the accuracy of the figures entered on the Delinquent Budget form verified, and the user has clicked the **Finish** button, you should receive the “District Finished” status for the Delinquent Budget form.

**Click on Delinquent Facility on the Delinquent Program menu.**

**DELINQUENT FACILITY**

The Delinquent Facility form will show the Delinquent Budget Summary in collapsed format giving the totals for each expenditure account. This form will also show the Delinquent Facility table giving the name, location and allocation of each local delinquent facility within the local education agency receiving Title I, Part D funding. The user should enter the amount budgeted for each facility assuring that each is within the allocation limit for each facility. Once the user clicks the
Save button, the total will be entered into the Delinquent Facility table. The user should click the Finish button once to be returned to the Delinquent Program Home screen.

**Submitting the Application**

As the user progresses through the list of application forms required for their local education agency under the Delinquent Program, “District Finished” will appear as the status as each form is completed.

<table>
<thead>
<tr>
<th>Delinquent</th>
<th>District Finished</th>
</tr>
</thead>
<tbody>
<tr>
<td>Form Name</td>
<td>Status</td>
</tr>
<tr>
<td>Delinquent Narratives</td>
<td>District Finished</td>
</tr>
<tr>
<td>Delinquent Budget</td>
<td>District Finished</td>
</tr>
<tr>
<td>Delinquent Facility</td>
<td>District Finished</td>
</tr>
</tbody>
</table>

Upon completion of all required forms, the Submit button will appear at the bottom of the Delinquent status table on the Delinquent Home screen. Clicking the Submit button will send an automatic e-mail to notify the SEA that the district has completed the application process. **Note:** Once the LEA submits the application, no changes can be made at the local level.

If a need arises to change budget figures prior to clicking the Submit button, the user may click the Delinquent Budget form on the Delinquent Home screen and click the Undo button on the Delinquent Budget form. This action will allow the user to make revisions to the budget as necessary. The user will need to click the Finish button and resolve any validation edits before again achieving the “District Finished” status.

**The Title I staff will not proceed with processing your application until all required forms have been completed and the Submit button is clicked.** The Submit button will not become available until all required forms have been completed.

**Reporting Title I Expenditures**

At the end of the project year, the district must declare final expenditures and complete the project budget via their Delinquent application. To initiate the process to report the district's actual Title I, Part D, Delinquent expenditures and receive final payment, as applicable, please follow the process outlined for each Title I program (general budget, carryover budget, migrant budget, local delinquent budget, SINA budget). Please note that all Title I budgets are to be finalized prior to July 15.

The most critical step to reporting Title I expenditures is to first decide if the budget you are reporting on needs to be amended. You need to file an amendment if:

- The total expenditures are less than the approved budget amount.
- The total spent in an expenditure category exceeds the budgeted amount by more than 10 percent.
- There are reimbursable Title I expenditures not included in the approved budget.

**Note:** If the district needs to file an amendment, please follow through with that process before reporting the Title I expenditures for the program.

Once a Title I application has been approved by the program consultant and Title I administrative consultant, the district will receive an e-mail to that effect. At this point there will only be two options: to add an amendment or finish the budget. After April 15, the Finish button will appear on each Title I budget to allow a district to report Title I expenditures as final.

**TIP:** The Finish button should NOT be clicked until the end of the project year when expenditures have been made and the district is ready to close out the program following the process outlined in this section.

To finalize a budget, go to the budget form of the Title I application program. Work your way through the following questions to determine if your district is ready to finalize or needs to complete a budget amendment before finalizing.
Are Title I project expenditures complete? Complete means all costs approved on budget have been paid (exception: salaries and benefits, which are fixed costs).

NO - Title I project expenditures, other than salaries and benefits, are NOT complete. You must wait until all Title I expenditures have been paid to close out your budget and then start the process over by answering this question again.

YES – Title I project expenditures, other than salaries and benefits, are complete. The next question is:

Is the following a true statement: A review of our Title I expenditures shows that:
- We did not spend less than the approved budget amount;
- We do not want to spend funds for something we did not include in the approved budget; and
- Our expenditures in any category do not exceed the approved amount by more than 10%.

NO – Our expenditures do not meet all three of the conditions above. You must complete an amendment process prior to reporting Title I expenditures as final.

YES – The district Title I contact and/or business manager agree that our expenditures meet all three of the conditions above. You may click the Finish button to finalize your program for the current school year and initiate the final payment, as applicable, to your district.

Tip: You are reminded that the Finish button should not be selected until the user is certain all project budget expenditures are final and accurately listed in the project budget being certified as complete.

The local education agency is required to report Title I expenditures as final for each approved program (i.e. Title I general and carryover funds, migrant funds, local delinquent funds, SINA funds).

Amending a Delinquent Budget

For various reasons, it may become necessary for an LEA to amend the approved budget during the project year. You need to file an amendment if:
- The total expenditures are less than the approved budget amount.
- The total spent in an expenditure category exceeds the budgeted amount by more than 10 percent.
- There are reimbursable Title I expenditures not included in the approved budget.

To complete this process, the LEA must submit an electronic amendment to the applicable approved budget of the Title I application. Note: If the district needs to file an amendment, please follow through with that process before reporting the Title I expenditures for the program.

The option for amending the Title I Local Delinquent Budget becomes available electronically once the SEA approves the local delinquent budget. The following is the amendment process for the local delinquent budget:

1. From the Delinquent Budget form of the Title I Delinquent Program application, click the Add Amendment button.
2. Complete the new budget by changing only those numbers that need to be changed. The totals will change as the user enters each number.
3. Click the Save button to save the new amended budget; then click the Finish button to return to the Delinquent Home screen.
4. Submit the amended budget by clicking the Submit button.

The amended budget will go through the approval process at the State Title I Office. As budget amendments are approved, necessary adjustments in payments will automatically be made. When amending to reflect your actual expenditures, please wait for the amendment to be approved by the state Title I Office before reporting Title I expenditures as final. Note: The original budget will be available following an amendment process by using the lookup menu on the local delinquent budget form.
Note: Local education agencies having at least one attendance center identified as a school in need of assistance need to complete this application process.

For technical assistance with the SINA program application, contact the Title I Consultant for your particular Area Education Agency (AEA).

The reauthorized Elementary and Secondary Education Act (ESEA) *No Child Left Behind Act of 2001 (NCLB)* continues to emphasize the goal of all students being proficient in reading and mathematics. Each year LEAs provide the Adequate Yearly Progress (AYP) data of students in Title I schools. When a school fails to make AYP for a single year, it is identified as a school in the “Watch” year. Schools in “Watch” year status do not face sanctions. However, to fulfill Title I Federal requirements (Section 1116) of ESEA, school buildings that do not make adequate yearly progress for two consecutive years are designated as schools in need of assistance (SINA). Buildings identified for two or more consecutive years in reading and/or mathematics must participate in a technical assistance program provided through the SEA. Efforts at the state, district and building levels must concentrate on actions that will be undertaken to assist all students in attaining proficiency. LEAs should be cognizant of this requirement and plan educational programming that implements strategies for improved student achievement.

Title I legislation requires buildings identified as SINA to publish a public notice related to this identification. In addition, this notice must provide parents with information regarding school choice options within the LEA.

A Statewide Support System for SINA has representatives from each area education agency. These individuals have received training to assist identified schools. An identified school must develop an action plan within 90 days of notification by the Iowa Department of Education. For technical assistance with compliance issues contact your Title I consultant. For technical assistance with the Statewide Support System process, contact Amy Williamson, 515/339-4122, amy.williamson@iowa.gov

The Iowa Department of Education is required by NCLB legislation, Section 1003, to reserve school improvement funds from the State Title I allocation. These funds must be used at the local level for the purpose of funding school improvement activities designed to improve student achievement in schools in need of assistance (SINA). Through a state allocation process these funds are allocated annually to local school districts for use in identified buildings.

Local education agencies that have received notification for a Title I school in need of assistance (SINA) and have received notification of school improvement grant funds that are available for use in the 2014-2015 school year to fund activities that support the building action plan must complete the SINA application in order to receive those funds. The SINA assurances and budgets may be accessed through the Title I electronic Internet application at https://portal.ed.iowa.gov. The Iowa Department of Education Iowa Education Portal site will appear. On the blue navigation menu bar, highlight “A&A Account” and click on “Sign In.” On the “Sign In” tab, enter your Account ID (email address) and password to sign into DOE – Education Portal. Click the “Sign In” button. The user should click Title I to access the Title I application Home screen.

Completion of the School Improvement SINA Budget for the district, School Improvement SINA Budget for each identified building, and School Improvement Assurances SINA forms together with the building Title I SINA action plan encompasses the basic requirements to apply for SINA funds. In addition, the district must complete the Within District Targeting of Funds (WDTF) form.

**Note:** LEAs receiving Title I SINA funds must complete a budget and participate in the development of the Title I SINA Action Plan for each identified school in need of assistance.
CONTACTS

Note: The Contacts screen must be completed in order to proceed with the application process.

The Contacts screen is where the Title I coordinator will enter contact information in the available areas. The contact person is the individual who will be contacted about information given in the SINA application.

Contacts

The user will see a listing of the Title I application programs that pertain to their local education agency and may see information listed for the last Title I SINA contact of record. The user will have the option to click the Delete button if the contact information is incorrect or the Edit button to update the contact information or leave it as listed. Please verify the SINA contact person’s e-mail address, name, mailing address, office telephone number, and title.

SINA

<table>
<thead>
<tr>
<th>First Name</th>
<th>Last Name</th>
<th>E-mail</th>
<th>Phone</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joe</td>
<td>Smith</td>
<td><a href="mailto:jsmith@school.k12.ia.us">jsmith@school.k12.ia.us</a></td>
<td>123/456-7890</td>
<td>Superintendent</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Ext. 987</td>
<td></td>
</tr>
</tbody>
</table>

SINA

No Contacts

If there is no SINA contact listed from the previous year, the user should click the No Contacts button to enter the correct information in the Contact form and then click the Save button.

SINA ASSURANCES

Click on “School Improvement” to open the SINA program application menu and click on SINA Assurances to begin the application process. Note: The School Improvement SINA Program application will only be available if your district has a Title I building that has been designated as a school in need of assistance (SINA).

The SINA Assurances form will be displayed. The assurances should be reviewed and the user should click on the box at the bottom to certify that the information contained in the SINA application and action plan is correct and that the user has been given the responsibility of acting as the authorized representative for the LEA. In certifying the assurances, the authorized agent also assures the Iowa Department of Education that the Title I SINA assurances will be implemented and complied with as stated and that it is understood that the local education agency must comply with all applicable requirements upon approval of this application and plan by the SEA.

Following the peer review process for the two-year SINA action plan and the Iowa Department of Education approval of the SINA application, half (50%) of the SINA allocation will be distributed to the LEA. The LEA must report the budget as final upon the completion of the project, which should be no later than July 15, 2015. The remainder of the funds will be distributed after the final certification is approved. All funds must be expended by June 30, 2015. Funds may not be carried over into the following school year. However, schools that remain on the SINA list or have SINA delay status may receive funds as available for the following year.

Iowa schools have worked hard to improve student achievement. On-going efforts and new initiatives are designed to continue this work and to benefit students. Thank you for your work as you proceed with this task. If you have questions,
please contact your consultant for technical assistance, compliance issues and questions regarding the Statewide Support System process.

Once the SINA Assurances form has been certified, click the Finish button to save this action and return to the SINA Program Home screen. The SINA Assurances form will show the “District Finished” status.

Click the SINA Budget form to be completed next.

**SINA BUDGET**

There are two Title I SINA budget forms: (1) the Title I SINA Program Budget Summary which represents the total district amounts requested for specific items found in the Budget for each identified building receiving School Improvement SINA funds; and (2) the Title I SINA Program Budget form which provides an itemized account of expenditures to be incurred for the identified building. The SINA budget is supported with additional Title I dollars allocated to your LEA. The SINA budget is to reflect expenditures that assist with the implementation of your SINA action plan. Therefore, there should be a direct and clearly discernible correlation between your SINA action plan and budget items. SINA funds must be used for activities that have the best possibility to improve and sustain student achievement and foster systemic change within your school. SINA funds cannot be used for expenditures that do not have a direct impact on student achievement (e.g. an extensive technology purchase, furniture, copier). **Note:** SINA funds cannot be carried over.

No data can be entered on the Title I SINA Program Budget Summary form for the district. This is a summary table that displays totals automatically transferred from the SINA Program Budget form for each identified building. To enter or review the Title I SINA budget for an identified building, from the SINA Home screen menu, click the building name.

Once the SINA Program Budget form is displayed for the identified building, the user will be allowed to enter the specific breakdown of Title I SINA expenditures claimed on the budget, and, if necessary, to provide a description of expenditures.

The user may only enter SINA budget figures on the building SINA Program Budget form and those figures will be automatically placed into the district Title I SINA Program Budget Summary table each time the user clicks the Tab button. **Note:** Do not attempt to enter any figures in the “Total” fields as the total is automatically calculated as you enter specific expenditure figures. Round all amounts to the nearest dollar. Be sure the total project budget amount applied for on the Title I SINA Program Budget does not exceed the Title I SINA allocation as noted on the SINA Program Budget form.

✔ **TIP:** Click Save often to avoid losing data.

The building SINA Budget form has as its purpose the providing of detail that is not possible to provide in the district Title I SINA Program Budget. To assist you with this specific budget development, the following explanation of the Title I Budget will be made by discussing the nine columns moving left to right across the top of the budget.

✔ **TIP:** Expenditures included in the budget will be approved only if the connection to the action plan is clear.

<table>
<thead>
<tr>
<th>FUNCTIONS</th>
<th>OBJECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expenditure Accounts</td>
<td></td>
</tr>
<tr>
<td>Salaries</td>
<td>Employee Benefits</td>
</tr>
<tr>
<td>100</td>
<td>200</td>
</tr>
<tr>
<td>Purchased Services</td>
<td>Supplies</td>
</tr>
<tr>
<td>300</td>
<td>600</td>
</tr>
<tr>
<td>Property</td>
<td>Other Expenses/Other uses of Funds</td>
</tr>
<tr>
<td>700</td>
<td>800</td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
</tr>
</tbody>
</table>
**Objects – Employee Benefits** – Title I SINA funds may be used to pay Iowa Public Employees Retirement System (IPERS), Federal Insurance Contribution Act (FICA) of salaried Title I employees employed for the purpose of the SINA project within the identified building, and other related benefits. Since the percent of contribution on both the above-mentioned programs may change, proposed expenditures should be based upon the current percent of 7.65% for FICA and 8.93% for IPERS. The user must itemize the employee benefits by categories on the Budget Detail screen – FICA, IPERS, and Insurance (e.g. workers compensation insurance, medical, dental, disability, life insurance, and unemployment).

**Objects – Purchased Services** – Purchased Services includes all payments to be made to other agencies or individuals not on the payroll for specific services performed for the SINA project within the identified building. **Note:** Equipment repair is considered a purchased services expense.

**Objects – Supplies** – Approvable amounts for materials and supplies for the Title I school improvement project are to be entered in the Supplies column. Expenditures for materials and supplies will be limited to the minimum required to implement and continue Title I SINA activities or services. Examples of supplies are consumable materials, computer software, books, manuals, etc. **Expenditures for Title I SINA supplies to be purchased must be itemized by category as identified on the building SINA Budget form.**

**Objects – Property** – Approvable amounts for instructional equipment are to be entered in the Property Column. Expenditures for instructional equipment will be limited to the minimum required to implement and continue Title I SINA activities or services. Examples of items budgeted in property might be computer hardware or furniture. **Expenditures for Title I SINA property to be purchased must be itemized by category as identified on the SINA Budget form.**

**Objects – Other Expenses and Other Uses of Funds** – The Other Expenses Column includes other expenditures not classified as Salaries, Employee Benefits, Purchased Services, Supplies or Property. This is the column to use for professional dues and indirect costs.

**Objects – Total** – This column includes the sum total of amounts recorded in each of the preceding columns.

⚠ **TIP:** See Function explanations below for proper placement of these costs.

Explanation of the Functions 1000-4000 requires certain detail related to regulations governing Title I SINA expenses. Each expenditure category is explained as follows:

<table>
<thead>
<tr>
<th>FUNCTIONS</th>
<th>SALARIES</th>
<th>EMPLOYEE BENEFITS</th>
<th>PURCHASED SERVICES</th>
<th>SUPPLIES</th>
<th>PROPERTY</th>
<th>OTHER EXPENSES/OFFICE USES OF FUNDS</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Instruction 1000</td>
<td><strong>Total $60,640</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$75,570</strong></td>
</tr>
<tr>
<td></td>
<td>Certified salary $2,640</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Associates salary $4,400</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Subs salary $5,455</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Other (No Indirect Costs) $48,145</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Instructional Coaches or Reading Specialist</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Total $2,705</td>
<td>FICA $1,898</td>
<td>IPERS $807</td>
<td>Ins $0</td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Travel Between Bldgs</td>
<td>Prof. Staff Development</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$11,225</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Other (No Indirect Costs)</td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Total $11,225</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Total $1,000</td>
<td>Consumables $0</td>
<td>Software $1,000</td>
<td>Title I Books $0</td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Diagnostic Testing Mat.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Other (No Indirect Costs)</td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Total $1,000</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Computer</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td>Total $0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>$0</strong></td>
</tr>
</tbody>
</table>

**Function 1000 – Instruction** – Instruction costs would include salaries and employee benefits that are paid to existing teachers who work beyond the contract day or year for such purposes as additional professional development, student academic assistance, parent engagement planning or presentation, or other activities as appropriate. **Note:** Additional staff may not be hired for the purpose of adding additional grade level sections or reducing class size, but they can be
hired as instructional coaches. However, substitute teachers or temporary staff may be hired for the purpose of developing, implementing or evaluating the SINA action plan. Title I SINA funds may be used to pay employee benefits under the Iowa Public Employees Retirement System (IPERS) and Federal Insurance Contribution Act (FICA) for salaried Title I teachers and educational associates as these are mandated by law.

Purchased Services would include stipends paid to non-district employees for such things as professional development activities and material or program development specific to the SINA action plan. The Supplies column includes approvable amounts for supplementary materials that are directly connected to the SINA action plan that would not ordinarily be the responsibility of the district. The Property costs would be utilized for approvable amounts for supplementary instructional equipment that is directly connected to the SINA action plan that is beyond that typically purchased by the district.

Other Expenses and Other Uses of Funds would include indirect costs and would not be included under Function 1000 Instruction costs.

**TIP: Indirect Costs go under Function 2300.**

<table>
<thead>
<tr>
<th>FUNCTIONS</th>
<th>O B J E C T S</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expenditure Accounts</td>
<td></td>
</tr>
<tr>
<td>Instructional Staff and Support Services 2200</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Salaries 100</td>
<td>Employee Benefits 200</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Administration Support Services 2300</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total $0</td>
</tr>
</tbody>
</table>

**Function 2200 – Instructional Staff and Support Services** – Purchased Services includes amounts for in-service and travel.

<table>
<thead>
<tr>
<th>FUNCTIONS</th>
<th>O B J E C T S</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expenditure Accounts</td>
<td></td>
</tr>
<tr>
<td>Administration Support Services 2300</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Total $0</td>
</tr>
</tbody>
</table>

**Function 2300 – Administration Support Services** – Salaries and Employee Benefits for the administration of Title I programs cannot be paid from Title I SINA funds.

Approvable amounts for restricted indirect costs are to be entered on the Title I SINA project budget in the column, Other Expenses and Other Uses of Funds.

Indirect Costs are those costs that are not readily identifiable with the activities or contracted services, but are nevertheless incurred for the joint benefit of those activities and programs of the organization. Note: Indirect cost expenditures must comply with the U.S. Office of Management and Budget Circular A87.

The Iowa Department of Education annually calculates the indirect cost rates for LEAs from data submitted on their certified annual reports. The Iowa Restricted Indirect Cost Plan for LEAs establishes maximum predetermined rates for a given fiscal year. The advantage of an Indirect Cost Allocation Plan and rate is that it is a simplified means for determining a fair share for indirect costs of Federal grants and contracts. For information regarding the indirect cost rate calculation, contact Janice Evans, School Finance Consultant at 515/281-4740 or janice.evans@iowa.gov.
The indirect cost rate percentages for each LEA can be found at the Iowa Department of Education website at https://www.educateiowa.gov/indirect-cost-rate. The restricted indirect cost percentage can be applied only to the amounts of salaries and employee benefits approved for Title I SINA staff.

TIP: If the indirect cost amount applied for on the budget exceeds the maximum allowed for budgeted salaries and benefits, a RED warning will be received and will need to be corrected prior to proceeding.

Note: For Title I purposes, the given fiscal year indirect cost rate applies to the project established for the school year and remains in place even when project expenditures extend into the next fiscal year.

<table>
<thead>
<tr>
<th>FUNCTIONS</th>
<th>OBJECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expenditure Accounts</td>
<td></td>
</tr>
<tr>
<td>Salaries 100</td>
<td>Employee Benefits 200</td>
</tr>
<tr>
<td>Student Transportation Services 2700</td>
<td>Total $0</td>
</tr>
</tbody>
</table>

Function 2700 – Student Transportation Services – There would be few instances where Title I SINA dollars could be used for transportation.

Note: The district set-aside from Title I general budget project funds cover transportation costs for school choice.

<table>
<thead>
<tr>
<th>FUNCTIONS</th>
<th>OBJECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expenditure Accounts</td>
<td></td>
</tr>
<tr>
<td>Salaries 100</td>
<td>Employee Benefits 200</td>
</tr>
<tr>
<td>School Nutrition Services 3100</td>
<td>Total $0</td>
</tr>
</tbody>
</table>

Function 3100 – School Nutrition Services – Title I SINA funds may be used for providing food and food services only when they are not covered by State or Federal funds received from the Bureau of Nutrition and Health Services of the Iowa Department of Education. The SEA will review each request individually.

<table>
<thead>
<tr>
<th>FUNCTIONS</th>
<th>OBJECTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Expenditure Accounts</td>
<td></td>
</tr>
<tr>
<td>Salaries 100</td>
<td>Employee Benefits 200</td>
</tr>
<tr>
<td>Community Services (Parent) 3300</td>
<td>Total $0</td>
</tr>
</tbody>
</table>

Function 3300 – Community Services (Parent) – Title I SINA funds used for community services (parent) would include all costs incurred for parent/family engagement activities beyond those that are the responsibility of the district such as a
nominal amount for food provided as part of a parent meeting or activity; childcare during parent activities; printing for parent activities; books for at-home reading. **Note:** Only activities beyond those already funded by Title I general budget project funds would be allowed.

**SINA BUDGET TIP SHEET**

- There should be a clearly apparent connection between each budget item and the SINA action plan.

- Most budget items for SINA will fit in line item 1000 “Instruction” and line item 3300 “Community Services (Parent).”

- Line item 1000 “Instruction” would include salaries and benefits that are paid to existing teachers who work beyond the contract day or year for such purposes as:
  1. Additional professional development.
  2. Student academic assistance.
  3. Parent engagement planning or presentation.
  4. Other activities as appropriate.
    **Note:** Additional staff may not be hired for the purpose of adding additional grade level sections or reducing class size. However, substitute teachers or temporary staff may be hired for the purpose of developing, implementing, or evaluating the SINA action plan.

- Line item 1000 “Purchased Services” would include stipends paid to non-district employees for such things as:
  1. professional development activities;
  2. material or program development specific to the action plan.

- Line item 1000 “Supplies” would be used for materials that are directly connected to the SINA action plan that would not ordinarily be the responsibility of the district (Supplement vs. Supplant).

- Line item 1000 “Property” would be utilized for equipment that is directly connected to the SINA action plan that is beyond that typically purchased by the district (Supplement vs. Supplant).

- Line item 2300 “Other Expenses” would include indirect costs. Indirect cost rates are posted annually on the Iowa Department of Education website. District indirect costs are calculated only on budgeted salaries and benefits.

- Line item 3300 Community Services (Parent) would include all costs incurred for parent/family engagement activities beyond those that are the responsibility of the district, such as:
  1. a nominal amount for food provided as part of a parent meeting or activity;
  2. childcare during parent activities;
  3. printing for parent activities;
  4. books for at-home reading.

After all detail is completed, the user needs to click the **Finish** button. The user must fix all errors appearing in RED. The user must verify any data highlighted with a **YELLOW** validation edit.

✔ **TIP:** Do NOT double-click the Finish button.

When all information has been entered and corrected on the building SINA Program Budget form, the user will be returned to the SINA Program Home screen and the building SINA budget will display the “District Finished” status. The user may continue to build budgets for additional SINA schools by clicking on the building names in the menu or click on the district SINA Program Budget form to see the total budget figures in each category on the summary table.

When all building SINA Program Budget forms and validation edits are complete, click on the **Finish** button. The user will be returned to the SINA Program Home screen.

Upon completion of all required forms, the **Submit** button will appear at the bottom of the status table on the SINA Program Home screen. Clicking the **Submit** button will send an automatic e-mail to notify the SEA that the district has completed the SINA application process.
Once the user has clicked the Submit button, the district will not be able to make changes to the Title I application forms. If there would be the need to make a change to information submitted in the application, please contact the Title I consultant for your AEA.

If during the course of the SINA budget project year it becomes necessary for the user to amend the identified building budget, please refer to the Title I Amending a Title I Budget section to receive guidance on submitting an amendment to the SINA budget.

At the close of the SINA budget project year, the user should refer to the Title I Reporting Title I Expenditures section to comply with the requirements for reviewing the SINA budget and certifying the SINA project budget as final. School improvement funds must be expended by June 30, and final certification of the Title I SINA budget must be finished no later than July 15. There are no carryover funds but if the district spent less than the approved amount on the SINA project, the SINA budget must be amended to reflect actual expenditures. Refer to the Amending a Title I Budget section for guidance on amending a SINA budget, if necessary.

SINA/DINA Action Plan

Schools and districts in need of assistance (SINA/DINA) must submit electronically through the Iowa Department of Education web application server a SINA/DINA plan. The action plan may be found at https://portal.ed.iowa.gov under C-Plan. Federal legislation requires technical assistance in developing the action plan and implementing instructional strategies to improve student achievement. All Title I schools in need of assistance must develop the two-year action plan in consultation with parents, school staff, the local education agency, and outside experts.

Each AEA has Statewide SINA Support Team members trained to assist schools in the process as prescribed in NCLB, Section 1117. Local school districts are encouraged to avail themselves of the expertise of these individuals. The action plan should be completed, peer reviewed, and submitted to the state Title I office within 90 days of notification (due by November 1, 2014).

As you prepare to update your two year plan in the spring, it is important to focus on data relative to administrators, teachers, students, parents, and other stakeholders. It is imperative that the building/district frequently evaluate the success of actions outlined in the SINA/DINA plan. The system must be flexible enough to make appropriate adjustments to the plan BASED ON DATA to ensure increased student achievement and appropriate professional development of staff. As you monitor the effectiveness of your plan, always ensure that the actions are systemic in nature.
**SINA Timeline**

When a Title I school fails to make AYP, what is required?

<table>
<thead>
<tr>
<th>Watch Year</th>
<th>SINA/Delay 1</th>
<th>SINA/Delay 2</th>
<th>SINA/Delay 3 (Corrective Action)</th>
<th>SINA/Delay 4 (Plan for Restructuring)</th>
<th>SINA/Delay 5+ (Restructuring)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No actions are required</td>
<td>District Responsibilities: ✓ Notify parents ✓ Provide outside technical assistance ✓ Conduct peer reviews ✓ Approve building SINA plans ✓ Offer transfer option Reserve funds: ✓ 5% of district Title I allocation for choice-related transportation (unless a smaller amount is needed to comply) ✓ 15% of district Title I allocation for other needs related to choice</td>
<td>District Responsibilities: ✓ Notify parents ✓ Provide outside technical assistance ✓ Conduct peer reviews ✓ Approve building SINA plans ✓ Offer transfer option ✓ Offer Supplemental Educational Services Reserve funds: ✓ 5% of district Title I allocation for choice-related transportation (unless a lesser amount is needed to comply) ✓ 5% of district Title I allocation for Supplemental Education Services (unless a smaller amount is needed to comply) ✓ 10% of district Title I allocation for other needs related to choice</td>
<td>District Responsibilities: ✓ Notify parents ✓ Provide outside technical assistance ✓ Choose corrective action for each SINA 3 building from following options: o replace the school staff who are relevant to the failure to make AYP o institute and fully implement a new curriculum, including professional development o significantly decrease management at the school o extend the school day or school year o restructure the internal organization of the school o appoint one or more outside experts to advise the school ✓ Publicize and disseminate corrective action to all parents, media, etc. ✓ Provide opportunity for comment on corrective action to teachers and parents ✓ Approve building corrective action plans ✓ Offer transfer option ✓ Offer Supplemental Educational Services Reserve funds: ✓ 5% of district Title I allocation for choice-related transportation (unless a lesser amount is needed to comply) ✓ 5% of district Title I allocation for Supplemental Education Services (unless a smaller amount is needed to comply) ✓ 10% of district Title I allocation for other needs related to choice and SES</td>
<td>District Responsibilities: ✓ Notify parents ✓ Provide outside technical assistance ✓ Choose restructuring action for each SINA 4 building from following options: o public charter o replace all/most of staff o private management o Other major restructuring ✓ Provide opportunity for teacher and parent participation in development of plan ✓ Provide notice of the restructuring action to teachers and parents and opportunity for comment ✓ Approve building restructuring plans ✓ Offer transfer option ✓ Offer Supplemental Educational Services Reserve funds: ✓ 5% of district Title I allocation for choice-related transportation (unless a lesser amount is needed to comply) ✓ 5% of district Title I allocation for Supplemental Education Services (unless a smaller amount is needed to comply) ✓ 10% of district Title I allocation for other needs related to choice and SES</td>
<td>Reserve funds: ✓ 5% of district Title I allocation for choice-related transportation (unless a lesser amount is needed to comply) ✓ 5% of district Title I allocation for Supplemental Education Services (unless a smaller amount is needed to comply) ✓ 10% of district Title I allocation for other needs related to choice and SES</td>
</tr>
<tr>
<td>Watch year</td>
<td>SINA/Delay 1</td>
<td>SINA/Delay 2</td>
<td>SINA/Delay 3 (Corrective Action)</td>
<td>SINA/Delay 4 (Plan for Restructuring)</td>
<td>SINA/Delay 5+ (Restructuring)</td>
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<tr>
<td><strong>Building Responsibilities:</strong></td>
<td>✓ Develop and implement a SINA plan</td>
<td>✓ Develop and implement a SINA plan</td>
<td>✓ Develop and implement plan for corrective action</td>
<td>✓ Develop plan for restructure</td>
<td>✓ Implement restructuring plan</td>
</tr>
<tr>
<td>✓ Align SINA budget and action plan</td>
<td>✓ Align SINA budget and action plan</td>
<td>✓ Define root cause of building missing AYP and identify how plan will improve academic achievement</td>
<td>✓ Define root cause of building missing AYP and identify how plan will improve academic achievement</td>
<td>✓ Define root cause of building being identified for restructuring and identify how plan will improve academic achievement</td>
<td>✓ Align SINA budget and action plan</td>
</tr>
<tr>
<td>✓ Define root cause of building missing AYP and identify how plan will improve academic achievement</td>
<td>✓ Define root cause of building missing AYP and identify how plan will improve academic achievement</td>
<td>✓ Continue to implement corrective action</td>
<td>✓ Continue to implement corrective action</td>
<td>✓ Continue to implement corrective action</td>
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<tr>
<td><strong>Reserve funds-</strong></td>
<td>✓ Reserve and spend 10% of building Title I allocation for professional development in the area of identification</td>
<td>✓ Reserve and spend 10% of building Title I allocation for professional development in the area of identification</td>
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<td><strong>State Responsibilities:</strong></td>
<td>✓ Make technical assistance available</td>
<td>✓ Make technical assistance available</td>
<td>✓ Make technical assistance available</td>
<td>✓ Make technical assistance available</td>
<td>✓ Make technical assistance available</td>
</tr>
<tr>
<td>✓ If SEA determines that an LEA failed to carry out its responsibilities, take such corrective actions as SEA determines to be appropriate and in compliance with State law</td>
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</tr>
<tr>
<td>✓ Ensure that academic assessment results are provided to schools</td>
<td>✓ Ensure that academic assessment results are provided to schools</td>
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<td>✓ Ensure that academic assessment results are provided to schools</td>
<td>✓ Ensure that academic assessment results are provided to schools</td>
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</tr>
<tr>
<td>✓ Notify Secretary of major factors that were brought to the attention of the SEA that have significantly affected student academic achievement</td>
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</tbody>
</table>

**Note:** Please refer to detailed summary on DE website for specific requirements
## DINA Timeline

**When a district fails to make AYP, what must it do?**

<table>
<thead>
<tr>
<th>Watch Year</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Year 3+</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>District Responsibilities:</strong></td>
<td>✓ Complete questions through the Consolidated Plan (C-Plan).</td>
<td>✓ Complete questions through the Consolidated Plan (C-Plan).</td>
<td>✓ Participate in outside technical assistance including the development of a corrective action plan.</td>
</tr>
<tr>
<td></td>
<td>✓ Reserve 10% of district Title I allocation for professional development in the area of identification.</td>
<td>✓ Reserve 10% of district Title I allocation for professional development in the area of identification.</td>
<td>✓ Implement a system of corrective action as defined by the State.</td>
</tr>
<tr>
<td><strong>State Responsibilities:</strong></td>
<td>✓ Provide technical or other assistance if requested, as authorized under Section 1117, to better enable the local educational agency to—(i) develop and implement the local educational agency’s plan; and (ii) work with schools needing improvement.</td>
<td>✓ Provide technical or other assistance if requested, as authorized under Section 1117, to better enable the local educational agency to—(i) develop and implement the local educational agency’s plan; and (ii) work with schools needing improvement.</td>
<td>✓ State agency shall take at least one of the following corrective actions consistent with State law:</td>
</tr>
<tr>
<td></td>
<td>✓ Technical assistance provided by the State educational agency or an entity authorized by such agency shall be supported by effective methods and instructional strategies based on scientifically based research. Such technical assistance shall address problems, if any, in implementing the parental involvement activities described in Section 1118 and the professional development activities described in Section 1119.</td>
<td>✓ Technical assistance provided by the State educational agency or an entity authorized by such agency shall be supported by effective methods and instructional strategies based on scientifically based research. Such technical assistance shall address problems, if any, in implementing the parental involvement activities described in Section 1118 and the professional development activities described in Section 1119.</td>
<td>✓ Defer programmatic funds or reduce administrative funds.</td>
</tr>
<tr>
<td></td>
<td>✓ Participate in outside technical assistance including the development of a corrective action plan.</td>
<td>✓ Implement a new curriculum.</td>
<td>✓ Implement a new curriculum.</td>
</tr>
<tr>
<td></td>
<td>✓ Implement a system of corrective action as defined by the State.</td>
<td>✓ Replace superintendent with outside agency.</td>
<td>✓ Replace superintendent with outside agency.</td>
</tr>
<tr>
<td></td>
<td>✓ Abolish or restructure district.</td>
<td>✓ Provide technical or other assistance if requested, as authorized under Section 1117, to better enable the local educational agency to—(i) develop and implement the local educational agency’s plan; and (ii) work with schools needing improvement.</td>
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</table>
**SINA Set-Asides**

For technical assistance with Choice and Supplemental Education Services, contact Susan Selby at 515/281-4732 or susan.selby@iowa.gov.

Local Education Agencies, with Title I schools identified as a school in need of assistance (SINA), are required to reserve 20% from the general Title I allocation—with a minimum of 5% for school choice-related transportation and 5% for Supplemental Education Services (SES). This 5% is the minimum that an LEA must reserve for each category. The remaining 10% is to be used to fulfill remaining requests for choice or SES. When deciding how to expend this reserve, districts must keep in mind that they are to fulfill all requests for choice and SES until the reserve has been depleted. It is at this point that district can revert any unexpended funds.

**Choice-Related Transportation**

The law establishes joint funding for choice-related transportation and Supplemental Education Services (SES). Unless a lesser amount is needed to meet demand for choice-related transportation and to satisfy all requests for SES, an LEA must spend an amount equal to 20 percent of its Title I, Part A allocation. If an LEA spends less than the amount needed to meet its 20 percent obligation, it must meet the following criteria before it may use unexpended funds from the 20 percent obligation for other allowable activities.

**ASSURANCES**

The district has met the following criteria:

a. Partnered to the extent practicable, with outside groups, such as faith-based organizations, other community-based organizations, and business groups, to help inform eligible students and their families of the opportunities to transfer or to receive supplemental education services.

b. Ensured that eligible students and their parents have a genuine opportunity to sign up to transfer or to obtain supplemental education services by—
   1) Providing timely, accurate notice
   2) If applicable, ensuring that sign-up forms for supplemental education services are distributed to all eligible students and their parents and are made widely available and accessible through broad means of dissemination, such as the Internet, other media, and communications through public agencies serving eligible students and their families
   3) If applicable, providing a minimum of two enrollment “windows,” at separate points in the school year, that are of sufficient length to enable parents of eligible students to make informed decisions about requesting supplemental education services and selecting a provider
   4) If applicable, ensuring that eligible supplemental services providers are given access to school facilities, using a fair, open, and objective process, on the same basis and terms as are available to other groups that seek access to school facilities.

c. Assures that funds will be reverted to the district’s general Title I budget and expended in compliance with all Federal and State laws, rules, and regulations regarding Title I programming.

In addition, an LEA that spends less than the amount needed to meet its 20 percent obligation and does not intend to spend the unexpended amount in the subsequent school year must maintain records that demonstrate it has met the criteria above and must notify the SEA that it has met the criteria and intends to spend the remainder of its 20 percent obligation on other allowable Title I activities.

Districts must notify the Iowa Department of Education if they do not intend to spend the total 20 percent set aside.

Please contact Susan Selby at susan.selby@iowa.gov for the form, “NOTIFICATION – Unexpended Funds for Choice-Related Transportation & Supplemental Education Services” or access it through this
SCHOOL CHOICE / TITLE I SCHOOLS

When a school is identified as SINA, what must they do?

Upon identification of status as a school in need of assistance, the district must use an Iowa Department of Education template to provide parents with written information regarding the following:

- Reason for identification.
- What identification means.
- Comparison of building achievement to other buildings in the district.
- Opportunities for parents to become involved in the SINA process and student success.
- School choice/transfer options
  - Including, at minimum, the academic achievement levels at choice option schools.
- Details about actions the school is taking to address low performance.
- Details of what SEA/LEA is doing to assist the identified school.

When must Title I schools identified as SINA offer public school choice to their students?

Title I schools must offer public school choice to their students if the school is:

- In the first year of school improvement,
- In the second year of school improvement,
- In corrective action, or
- In the planning year for restructuring.

The district must report to the Iowa Department of Education, through Student Reporting in Iowa (SRI), the following for each identified building:

- The number of students eligible for choice.
- The number of students requesting choice.
- The number of students granted choice.

[Title I, section 1111(h)(4)(F)].

Which students in a Title I SINA school are eligible for the school choice option?

All students enrolled in a Title I SINA school are eligible for choice.

What if it is not possible to offer the school choice transfer option to all students requesting it?

Priority must be given to the lowest achieving, low income students.

Which schools can receive students through the school choice transfer option?

Any school offered as a choice option must have higher academic performance than the school of origin and may not be identified for improvement.

If more than one school is available as a choice option, the LEA must offer more than one school choice to eligible students.

Which schools in the LEA cannot receive students for the school choice option?

Students may not transfer to any schools that:

- Have been identified for improvement, corrective action, or the planning year of restructuring; or
- Have been identified by the State as persistently lowest-achieving.
How are parents to be notified about the school choice option?

Parents should be notified about the school choice option by using the letter templates provided by the Iowa Department of Education at https://www.educateiowa.gov/pk-12/no-child-left-behind/schools-and-districts-need-assistance-simadina/guidance-schools-and.

- An LEA must provide a written explanation of the school choice transfer option to all parents of students enrolled in Title I schools that have been identified as having to provide choice. The explanation must assure that parents will understand what services are offered in receiving schools.
- This notification must be in a comprehensive, easy-to-understand format and to the extent practicable, in a language the parents can understand.
- At a minimum, this notification must:
  - Inform parents that their child is eligible to attend another public school due to the less than adequate performance of their current school;
  - Identify each public school, including public charter schools, that the parent can select; and
  - Describe the performance and overall quality of those schools.

How long must a school offer the school choice option?

If an eligible student exercises his or her school choice option, an LEA must permit the student to remain in the new school until the student has completed the highest grade in the school.

The LEA is no longer obligated to provide transportation for the student after the end of the school year in which the student’s school of origin is no longer identified for school improvement, corrective action, or in the planning year of restructuring.

What if no receiving schools are available to receive students through the school choice transfer option?

Parents must still be notified that their child’s school is identified for school improvement and that the child is eligible for the school choice transfer option, but that no choices are currently available.

Such notification may also inform parents of the option of supplemental education services for all children who are eligible.

- This may occur when all schools at a grade level are in school improvement. In this case, the LEA shall, to the extent practicable, establish a cooperative agreement with other LEAs in the area.
- Other situations may also exist, such as where there is only one school in the district or when the rural or isolated nature of an LEA prevents the school choice option.

What are the responsibilities of the receiving school?

A school that receives students under the school choice option must ensure that the students are enrolled in classes and other activities in the school in the same manner as all other students in the school.

What about transportation related to the school choice option?

An LEA with a school in need of assistance must pay for, or provide, transportation to the new school as a result of the school choice option.

- An LEA is responsible for transportation until the school of origin is no longer in improvement status.
The following is how an LEA may fund transportation costs for the school choice option:

- Unless a lesser amount is needed to meet demand for choice-related transportation and to satisfy all requests for supplemental education services, an LEA must spend up to an amount equal to 20 percent of its Title I, Part A allocation, before any reservations, for:
  - Choice-related transportation;
  - Supplemental education services; or
  - A combination of choice-related transportation and supplement education services.

If necessary, the LEA must establish priorities in determining who receives services.

- When more students request services than the school district can fund, the district must place a priority on serving students who are the lowest achieving.

**Supplemental Education Services**

Each summer Local Education Agencies (LEAs) across Iowa complete their Adequate Yearly Progress (AYP) site for their schools. Some Title I schools will be identified as Schools in Need of Assistance (SINA) for two or more years. These SINA 2 or higher schools will need to meet the federal Supplemental Education Services (SES) regulations.

Supplemental education services (SES) is additional academic instruction designed to increase the academic achievement of eligible students in schools in the second year of improvement, corrective action, or restructuring. These services, which are in addition to instruction provided during the school day, may include academic assistance such as tutoring, remediation and other supplemental academic enrichment services that are consistent with the content and instruction used by the LEA. SES must be high quality, research-based, and specifically designed to increase student academic achievement.

The Iowa Department of Education (IDE) must approve SES provider applications and post the approved list on the IDE website at: https://www.educateiowa.gov/documents/title-i/2014/09/supplemental-educational-services-provider-list.

Section 1116 of NCLB requires “the local educational agency to develop, in consultation with parents (and the provider chosen by the parents) a statement of specific achievement goals for the student, how the student’s progress will be measured, and a timetable for improving achievement” [Section 1116(e)(3)(A)].

It is the responsibility of the LEA, not the responsibility of a provider, to ensure that an agreement is completed for each student participating in SES and that each agreement includes the information required under the statute. However, an LEA and a provider may agree that the provider will complete, on behalf of the LEA, the agreement for each student the provider serves. An LEA cannot require a provider to develop the agreements for the students it serves, absent the provider’s consent. Ultimately, the LEA is responsible for reviewing and approving all agreements, and for making sure that all agreements, whether developed by the LEA or by a provider on behalf of the LEA, are completed for all students participating in SES and include the required information.

Additionally, LEAs may be contacted by SES providers wishing to discuss their services for students. LEAs should make every attempt to foster a cooperative relationship with SES providers who will be working with students from the identified school.

Full SES guidance can be found at: http://www2.ed.gov/policy/elsec/guid/suppsvcsguid.doc.

**Understanding Supplemental Education Services (SES):**

Supplemental education services must be:

- High quality, research-based tutorial programs.
- Designed to increase the academic achievement of children.
Explained to parents so they are given the opportunity to select a service from a list of State-approved providers.

Outside the regular school day.

Aligned with district content standards and instruction.

**Note:** The district is not required to provide transportation for off-site SES.

**Schools identified as a school in need of assistance in year 2 must:**

- Offer supplemental education services to all low-income students.
- Offer choices of multiple State-approved supplemental education services providers.
- Set aside funds to pay the per pupil allocation for services provided.
- Assure that the school, parent, and supplemental education services provider work together.
- Work with the supplemental education services provider to design an individual student academic plan.

**State Role in Supplemental Education Services:**

The Iowa Department of Education will:

- Control the SES provider approval process.
- Assist with the monitoring of services and program implementation.
- Notify districts of changes/updates with Title I legislation regarding supplemental education services.

**District Role in Supplemental Education Services:**

The local education agency will:

- Collaborate with the Iowa Department of Education in identifying potential providers within the LEA.
- Notify parents at least twice per year of SES availability. There must be at least two enrollment times per year.
- Ensure that parents have current information, in a timely manner, by prominently displaying on district web site:
  - The number of students eligible for and the number of students who receive SES each year;
  - The location of supplemental education services in the district to ensure that parents have current information regarding district SES.
- Establish a process by which parents may sign students up for supplemental education services.
- If requested, assist parents in choosing a provider.
- Develop an individual student plan (ISP) for each student served.
- Enter into a contractual agreement with parent-selected SES providers regarding expectations for service, individual student academic plans and financial arrangements.
- Establish fair and equitable procedures for serving students if all students cannot be served.
- Ensure that eligible students with disabilities and limited English proficiency receive appropriate services.
- Protect the privacy of students who are eligible for or receive SES.
- Pay the per pupil allocation for services provided.
- Monitor SES program implementation.
- Meet with SES providers regularly.

The district must report to the Iowa Department of Education the following for each identified building:

- The number of students eligible for SES
- The number of students requesting SES
- The number of students receiving SES

Meet the 20% SES obligation. If an LEA spends less than the 20%, it must spend the remainder on SES in the following school year in addition to the 20% required in the following school year or
Complete a Notification of Unexpended Funds. Contact Susan Selby at susan.selby@iowa.gov for the form or access it through this link:\\Ed\data\EDGroup\Title One\Notifications of Unexpended Funds\Notification of unexpended funds 2013.8.29.docx.

Supplemental Education Services (SES) Notifications:
An LEA should work to ensure that parents have comprehensive, easy-to-understand information about SES [Section 1116(e)(2)]. AN LEA’s notice to parents must:

- Explain how parents can obtain SES for their child.
- Identify each approved SES provided within the LEA or in its general geographic location, including providers that are accessible through technology, such as distance learning.
- Describe briefly the services, qualifications and evidence of effectiveness for each provider.
- Indicate providers that are able to serve students with disabilities or LEP students.
- Include an explanation of the benefits of receiving supplemental education services.

The LEA’s notice to parents should also:

- Describe the procedures and timelines that parents must follow to select a provider to serve their child, such as where and when to return a completed application.
- Explain how the LEA will notify parents about enrollment dates and start dates.
- Provide LEA contact information.
- Include information, in the parental notification, on how the LEA will set priorities in order to determine which eligible students receive services if there are not sufficient funds to serve all eligible students.

In addition:

- Local education agencies may be contacted by supplemental education services providers wishing to discuss their services for students.
- LEAs should make every attempt to foster a cooperative relationship with SES providers who will be working with students from the identified school.
- Parents must be notified of their child’s eligibility for services.
- There are no “preferred” supplemental education services providers.

Supplemental Education Services Providers:
All supplemental education services providers including districts must be approved by the Iowa Department of Education. SES providers may include:

- Private providers—individuals or corporations.
- The local education agency for identified schools within or outside of the LEA.
- School buildings within the LEA.
- Area education agencies.

Please Note: Districts in Need of Assistance (DINAs) are not eligible to become approved SES providers.

The SES provider application can be found on the web site of the Iowa Department of Education at the following location: https://www.educateiowa.gov/pk-12/no-child-left-behind/supplemental-educational-services-ses.

Supplemental Education Service Provider Role in Supplemental Education Services:
The SES provider will:

- Ensure that instruction is research based, of high quality and is consistent with local academic standards.
- Be approved by the Iowa Department of Education as a recognized supplemental education services provider.
- Provide academic assistance to students outside of the regular school day in a secular, neutral and non-ideological environment.
- Work collaboratively with the LEA, SINA building principals, and parents.
- Assist each student in meeting specific achievement goals as determined in consultation with LEA, the provider and the student’s parents.
Adhere to timetable for improving student’s achievement as determined in consultation with LEA, the provider and the student’s parents.

- Measure students’ progress and regularly provide written feedback to the parents and classroom teachers regarding individual student progress (ISP reporting).
- Ensure confidentiality for any student eligible for or receiving SES without written permission of student’s parents.
- Meet all applicable federal, state and local health, safety, and civil rights laws.

**Calculating Supplemental Education Services Costs:**
Districts must set aside from Title I Part A funds an equivalent of 20% of the Title I allocation for SES/school choice, unless parent demand for SES/school choice transportation can be met with less.

The 20% of the Title I allocation set aside is reserved as:
- 5% for school choice.
- 5% for supplemental education services.
- Remaining 10% available for supplemental education services and/or school choice as need demands.

**Calculating the Per Pupil Allocation:**
- Section 1116 (e)(6) requires that each student receiving supplemental education services must get the lesser of:
  - The ED calculated per pupil amount for supplemental education services; or
  - The actual costs of Title I supplemental education services the student receives.
- The calculated per pupil amount is available on the Iowa Department of Education web site under Title I allocations for the 2013-2014 school year. The per pupil amount represents the LEA Title I Part A allocation divided by the U.S. Department of Education poverty formula child count.

**IOWA SUPPORT TEAM FOR SCHOOLS AND DISTRICTS IN NEED OF ASSISTANCE (SINA/DINA)**

The Iowa Support System for Schools and Districts in Need of Assistance (SINA and DINA) has been developed in response to state and federal legislation under NCLB. The legislation requires that “each state shall establish a statewide system of intensive and sustained support and improvement.” Within three months following identification by the Iowa Department of Education, No Child Left Behind requires that a School in Need of Assistance develop a two-year plan that:
- addresses core academic subjects;
- utilizes scientifically researched strategies;
- implements new teacher mentoring;
- includes parent involvement activities; and
- provides for a peer review of the plan.

The purpose of the Iowa Support System for Schools and Districts in Need of Assistance (SINA and DINA) is to assist the districts'/schools’ achievement of the following:
- Educate all students to high standards;
- Strengthen the internal capacity of each district and school;
- Focus accountability on results; and
- Integrate quality educational practices with local decision making.

The Iowa Support Team consists of representatives from each of Iowa’s Area Education Agencies and Iowa Department of Education Title I staff. For a current listing of the Iowa Support Team members, follow this link to the DE web site: [https://www.educateiowa.gov/documents/pk-12/2013/04/iowa-support-team-members](https://www.educateiowa.gov/documents/pk-12/2013/04/iowa-support-team-members).
Iowa Department of Education

Private School Guidance – Title I, Part A Program

Guidance in this document is based on the following resources:

- Title I Statute – Elementary and Secondary Education Act of 1965, Title I, Part A, as amended by the No Child Left Behind Act of 2001 Public Law 107-110, Section 1120
- Title I Regulations EDGAR 34 CFR Part 200.62-200.67

INTRODUCTION

The Title I program provides supplemental educational services so that all children have a fair, equal, and significant opportunity to obtain a high-quality education. Generally, to qualify for assistance under Title I, a student must reside within the attendance area of a participating public school located in a low-income area and be failing, or at risk of failing, to meet student academic achievement standards.

Under Title I, local educational agencies (LEAs) are required to provide services for eligible private school students, as well as eligible public school students. In particular, §1120 of Title I, Part A of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind Act (NCLB), requires a participating LEA to provide eligible children attending private elementary and secondary schools, their Title I teachers, and their families with Title I services or other benefits that are equitable to those provided to eligible public school children, their Title I teachers, and their families.

CONSULTATION

The Title I services for private school students must be developed in consultation with officials of the private schools. NCLB strengthened these requirements by, among other things, requiring meetings with private school officials and a written affirmation signed by private school officials that the required consultation has occurred. (The requirements for consultation are in §1120(b) of the Title I statute and §200.63 of the Title I regulations.)

What is consultation?
Consultation involves discussions between public and private school officials on key issues that affect the ability of eligible private school students to participate equitably in Title I programs. Effective consultation provides a genuine opportunity for all parties to express their views and to have those
Successful consultation establishes positive and productive working relationships that make planning easier and ensure that the Title I services provided meet the needs of eligible students.

A unilateral offer of services by an LEA with no opportunity for discussion is not adequate consultation. Only after discussing key issues relating to the provision of Title I services should the LEA make its final decisions with respect to the Title I services to be provided to eligible private school children, their Title I teachers, and their families.

How do LEAs begin the consultation process?
Federal guidance indicates that annually an LEA must contact officials of private schools with children who reside in the LEA regardless of whether the private school they attend is located in the LEA. One way to accomplish this is for the LEA to extend an invitation to officials of the private schools and convene a meeting with them at which LEA officials explain the intent of Title I and the roles of public and private school officials and provide opportunities for the private school officials to ask questions. It is not adequate consultation merely to send a letter to officials of the private schools explaining the intent of Title I.

Note: Iowa practice has often been for the district which includes the private school to contact the private school regarding eligible students who may reside in another public district.

When does an LEA consult with private school officials?
Consultation by an LEA must include meetings between the LEA and appropriate private school officials and must occur before the LEA makes any decision that affects the opportunity for eligible private school children, their teachers, and their families to participate in Title I programs. For example, if the LEA signs teacher contracts or orders supplies and equipment for the Title I program in the spring, the LEA must consult with the appropriate private school officials before signing those teacher contracts with Title I teachers or ordering supplies and equipment to provide Title I services for private school students.

Who participates in the consultation process?
Consultation includes appropriate public school officials and representatives of private schools and their central administrative offices, if appropriate. Private school officials can facilitate consultation by informing the LEA of which private school officials should be included in the consultation process and their roles and authority.

How long does consultation continue?
An LEA must meet with appropriate private school officials throughout the implementation and assessment of Title I services. This consultation must include early discussions to prepare for the next school year so that there is a timely start of the Title I program at the beginning of each school year, and throughout its implementation and assessment of services.

What are the regulatory requirements for consultation?
Under §200.63 of the Title I regulations consultation must, at a minimum, address the following issues:

- How the LEA will identify the needs of eligible private school children.
- What services the LEA will offer to eligible private school children.
- How and when the LEA will make decisions about the delivery of services.
How, where, and by whom the LEA will provide services to eligible private school children.

How the LEA will assess academically the services to private school children in accordance with §200.10 of the Title I regulations, and how the LEA will use the results of that assessment to improve Title I services.

The size and scope of the equitable services that the LEA will provide to eligible private school children and, consistent with §200.64 of the Title I regulations, the proportion of its Title I funds that the LEA will allocate for these services and the amount of funds that the LEA reserves from its Title I allocation for the purposes listed in §200.77 of the Title I regulations.

The method, or the sources of data, that the LEA will use (under §200.78 of the Title I regulations) to determine the number of private school children from low-income families residing in participating public school attendance areas, including whether the LEA will extrapolate data if a survey is used.

The services the LEA will provide to teachers and families of participating private school children.

Discussion of service delivery mechanisms the LEA will use to provide services.

What records on consultation must an LEA maintain?

Each LEA must maintain and provide to the State educational agency (SEA) a written affirmation, signed by officials of each private school with participating children or appropriate representatives of the private school officials that the required consultation has occurred. The Statement of Agreement screen on the revised (2012-13 school year) Iowa Title I electronic application meets this requirement.

What should an SEA do when an LEA has not provided it with written affirmations from private school officials?

When an LEA has not obtained a written affirmation signed by private school officials, an SEA may request that the LEA provide a reason for the lack of affirmation. In some cases, the reason may be that the private school officials did not want Title I services. However, if the reason is that there is a disagreement between the LEA and private school officials, the SEA may facilitate resolution of their differences.

Do private school officials have the right to complain?

Private school officials have the right to complain to the SEA if they believe that an LEA did not engage in timely and meaningful consultation or did not consider their views.

COMPLAINT PROCESS

Improving the consultation process and opening the lines of communication should result in Title I programs that are designed to better meet the needs of the private school participants. Effective and ongoing consultation may deter formal complaints to the state education agency (SEA) by private school officials; however, private school officials have the right to complain to the SEA if they do not believe their eligible children, teachers, or families are receiving equitable services. Updated information about the complaint process will be found outlined in the 2012-13 Title I Reference Manual and on the Title I, Part A page of the Iowa Department of Education web site.
If the private school official does not believe that the LEA engaged in timely and meaningful consultation, or that the LEA did not give due consideration to the views of the private school official, or disputes the low-income data on private school children, or for another reason does not believe that the private school children are receiving fair and equitable Title I services, the private school official may file a complaint with the SEA. The decision of the SEA may be appealed to the U.S. secretary of education.

Under Title I, a local education agency (LEA) is required to provide to eligible private school children, their Title I teachers, and their families Title I services or other benefits that are equitable to those provided to eligible public school children, their Title I teachers, and their families. Private school officials have recourse through the complaint process if they do not believe their eligible children, Title I teachers, or families are receiving equitable services. Aspects of the complaint process that the private school officials should know:

- A private school official has a right to complain to the state educational agency (SEA) that the LEA did not engage in a timely and meaningful consultation process or did not give due consideration to the views of the private school officials.
- Any dispute regarding the accuracy of low-income data for private school students also can be the subject of a complaint.
- The SEA is required to have complaint procedures in place as required by Sec. 34 CFR 299.10–12. Included in these procedures is a reasonable time by which the SEA must respond in writing to the complaint.
- No later than 30 days following the written response by the SEA, or in the event the SEA fails to resolve the complaint within a reasonable period of time, the private school official may appeal the decision of the SEA to the secretary of the U.S. Department of Education. Such appeal must be accompanied by a copy of the SEA’s written response, if available, and a complete statement of the reasons supporting the appeal.
- The secretary must complete an investigation of the complaint and resolve the appeal within 120 days after receipt of the appeal.

DETERMINING EQUITABLE SERVICES

An LEA must, after timely and meaningful consultation with appropriate private school officials, provide Title I educational services to private school children who live in participating public school attendance areas and are identified by the LEA as at risk of failing. These services must be equitable in comparison to services and benefits provided to public school participants (§1120(a) of the Title I statute).

ALLOCATIONS

An LEA must allocate Title I funds to public school attendance areas, identified as eligible and selected to participate, in rank order on the basis of the total number of children from low-income families residing in each area (§1113(a) of the Title I statute and §200.78 of the regulations). The amount of Title I funds allocated to each participating public school attendance area is determined mainly on the basis of the total number of low-income students – both public and private – residing in each area. Expenditures for private school students in each area generally are determined based on the proportion of students from low-income families residing in that area who attend private school.
Funds generated by private school children from low-income families who reside in participating public school attendance areas shall be used only for instructional costs associated with providing Title I instructional services to private school children who are failing or at risk of failing and reside in participating public school attendance areas. Instructional expenses include such costs as teachers’ salaries, fringe benefits, books, workbooks, computers and computer software. The number of private school children from low-income families, upon which the generation of funds is based, does not need to be the same as the number of at-risk private school children being served, nor do the private school children served need to be those who generated funds.

The LEA officials, in consultation with private school officials, may pool funds for instruction in private schools or groups of private schools, such as schools of one religious denomination. The pooled funds are used to serve those private school students most at risk, as determined in consultation, who reside in participating public school attendance areas. When funds are pooled, the most at-risk children, as determined in consultation, receive services first, regardless of the amount of funds that was generated based on the number of children from low-income families attending that private school.

**ELIGIBLE CHILDREN**

To be eligible for Title I services, a private school child must reside in a participating public school attendance area and must meet the requirements in §1115(b) of Title I, which requires the LEA to use multiple, educationally related, objective criteria in selecting children to participate in the Title I program. Under that section, certain children may be identified as eligible solely by virtue of their status: for example, homeless children and children who in the preceding two years had participated in Head Start, Even Start, Early Reading First, a Title I preschool program, or a Title I, Part C (Migrant Education) program.

**DELIVERY OF INSTRUCTIONAL SERVICES**

After consultation with appropriate private school officials, the Title I services provided by the LEA for private school participants must be designed to meet their educational needs and that not only supplements but also is well coordinated with the educational services provided by the private school. The LEA is responsible for planning, designing, and implementing the Title I program and may not delegate that responsibility to the private schools or their officials. Consistent with §1115(c) of the Title I statute, the LEA provides a Title I program to private school children, employing methods and instructional strategies for improving academic achievement that have been shown to be effective through scientifically based research. The LEA must also give primary consideration to providing extended learning time and a high-quality curriculum. Title I services should complement classroom instruction, should not be a separate instructional program, and must be secular, neutral, and non-ideological.

**MAINTAINING CONTROL OF THE TITLE I PROGRAM**

Private school officials have no authority to obligate or receive Title I funds. The statute clearly states that the LEA must maintain control of Title I funds, materials, equipment, and property. No Title I funds may be paid to a private school.
BOOKS, MATERIALS, AND EQUIPMENT NECESSARY TO IMPLEMENT THE TITLE I PROGRAM

The LEA retains title to the books, other materials, and equipment purchased with Title I funds. Materials, etc. purchased with Title I funds may be used only by Title I participants and under the direction of Title I paid staff. Each item purchased with Title I funds must be labeled “Property of School District.” The labels should not be either easily erased or removable.

Title I funds may only be used to meet the educational needs of participating private school children (Sec. 200.66 of the Title I regulations). The LEA may not use Title I funds for the needs of the private school or the general needs of the children in the private school. The LEA must have control of the Title I funds at all times and the LEA must have the title to materials, equipment, and property purchased with Title I. It is important that the LEA have a method to track materials, equipment, and property purchased with Title I funds and located in the private school.

The Title I program must be conducted in space used (at the time) exclusively for Title I instructional services and the control of Title I funds and title to materials, equipment, and property purchased with Title I funds must be with the LEA. Title I equipment and materials may only be used by Title I eligible students and under the direction of Title I paid staff.

PARENTAL INVOLVEMENT

A proportional share of the LEA’s allocation for parental involvement activities funds must be made available for parental involvement activities that benefit the families of private school Title I participants.

Title I places considerable emphasis on parental involvement. Section 1118 of the Title I statute contains many provisions concerning an LEA’s responsibilities for carrying out parental involvement activities. Research shows that parent involvement in the education of their children is a critical factor in improving academic achievement. If students are to attain and maintain grade-level proficiency and achieve high academic standards, parents must support their children’s learning.

Parent or family involvement is more than just surveying parents or bringing them together for a meeting to listen—they also must be given opportunities for meaningful participation and active involvement. Parent involvement activities must be designed and implemented to meet the needs of the parents of Title I participants—not the needs of either the LEA or the private school. Parents of Title I participants should receive training and materials to help them work with their children to improve their children’s achievement. These activities can be independent or provided through the LEA.

The district should have on file the background information for this budget detail expenditure, but would not be required to include this on the electronic application itself. For example: Parental Involvement Reservation under Section 1118 of ESEA.
In participating public school attendance areas:

<table>
<thead>
<tr>
<th>No. of private school children from low-income families</th>
<th>Total no. of children from low-income families</th>
<th>Proportion of Reservation divided by</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proportion of Reservation</td>
<td>Reservation for Equitable Services</td>
<td>equals $_________________________</td>
</tr>
</tbody>
</table>

**PROFESSIONAL DEVELOPMENT**

Professional development is another major emphasis in Title I. When an LEA reserves funds from its total Title I allocation for carrying out Title I professional development activities, the LEA must provide equitable services to teachers of private school participants from this reservation and any other reservation for professional development not associated with districts or schools in improvement (under Sec. 1119). As required under Sec. 200.65 of the Title I regulations, LEA officials determine the amount of these equitable services based on the reserved funds in proportion to the number of private school children from low-income families residing in participating public school attendance areas.

Professional development activities should enrich teacher knowledge and provide opportunities for both the Title I teachers and private school teachers of Title I participants to increase their skills and knowledge regarding providing instruction to Title I children. Activities must be secular, neutral, and non-ideological. All decisions regarding professional development activities for private school teachers of Title I participants are made through timely and meaningful consultation. The final decision is the responsibility of the LEA officials. LEA and private school officials should be aware that some professional development activities allowed under Title II, Part A of ESEA are not allowed under Title I.

**STANDARDS, ASSESSMENT AND PROGRAM MODIFICATION**

An LEA must annually assess the progress of the Title I program toward enabling private school Title I participants to meet the agreed-upon challenging academic standards and how the results of that assessment will be used to improve services. The LEA may use the State’s assessment system (under §1111(b)(3) of Title I) or other assessment measures that more accurately reflect the progress of the private school participating students toward meeting the standards that the LEA, in consultation with private school officials, has determined is appropriate. The LEA officials have the authority to make the final decision on what assessments will be used. An appropriate assessment may be the one already in use at the private school.

The Title I program also must be assessed. The assessment should evaluate the effectiveness of the program against the agreed-upon standards, as discussed in consultation, so that the public and private school officials can determine if the needs of the private school participants have been met, gaps in knowledge have been closed, and achievement in the regular private school classroom has improved. This information also should be used to plan an effective Title I program for the next school year. It should be noted that the LEA officials, after consultation with private school officials, determine the standards and assessments for the Title I program provided to private school children.
Every year the LEA and private school officials must consult on what constitutes annual progress for the Title I program. In measuring annual progress, the LEA has the flexibility to group children in a manner that will provide the most accurate information about their progress. For example, the LEA may decide to group children by instructional method, grade level, school, or other appropriate basis. If the Title I program for the private school participants does not make the expected annual progress, the LEA must annually make modifications to the Title I program. While LEAs are required to assess progress of Title I students annually, they should also consult with private school officials/teachers regularly about the progress the Title I private school participants are making in their regular classrooms, and make modifications more often, if needed. In addition, the assessment data will assist the public and private school officials in determining the professional development needs of the private school teachers who teach participating Title I participants and determining the most appropriate activities for their parents.
CONSULTATION TOPICS CHECKLIST

As part of the Title I application process and consultation, private school representatives will receive an email and will be asked to respond to questions related to the meeting with public school officials. The private school representatives are requested to respond whether or not their school will be participating and receiving Title I services. These are the topics to be discussed and the items to which the private school representative will respond.

It is understood that § 1120(b) of the Elementary and Secondary Education Act and § 200.63 of the Title I regulations requires consultation to take place between appropriate public and private school officials prior to any decision that affects the implementation of Title I services or the opportunities of eligible private school children, teachers or other educational personnel to participate in programs under this act in this private school.

Note that the consultation between public and private school officials doesn't necessarily mean that agreement upon the following have been reached, but simply that the following topics were discussed as part of the consultation noted above with respect to Title I services to be provided for the 2013-2014 school year.

- Did the officials from _____ School attend the consultation meeting?
- Will _____ School participate in the Title I program?
- Location of Title I Services
- How the public school district will identify the needs of eligible private school children
- What services the public school district will offer to eligible private school children
- How and when the public school district will make decisions about the delivery of Title I services
- How, where, and by whom the public school district will provide services to eligible private school children
- How the public school district will assess academically the services to private school children in accordance with § 200.10 of the Title I regulations, and how the public school district will use the results of that assessment to improve Title I services
- The size and scope of the equitable services that the public school district will provide to eligible private school children and, consistent with § 200.64 of the Title I regulations, the proportion of public school district’s Title I funds that will be allocated for services to eligible private school children
- The method, or the sources of data, that the LEA will use under § 200.78 of the Title I regulations to determine the number of private school children from low-income families residing in participating public school attendance areas, including extrapolation if a survey is used.
- The equitable services the public school district will provide to teachers and families of participating private school children
- The service delivery mechanisms the public school district will use to provide services
- It is understood that under § 200.66 of the Title I regulations, the public school district must maintain control of Title I funds at all times and must have the title to materials, equipment and property purchased with Title I funds. The public school district has explained the method that will be used to track materials, equipment and property purchased with Title I funds and located in the private school. Title I equipment and materials may only be used by Title I eligible students and under the direction of Title I paid staff.
Iowa Department of Education

Program Coordination for Children Receiving Services from Title I, Part A, and/or Services from Title X, Part C

Questions and Answers

Title I, Part A, Subpart 1 – Basic Program Requirements:

Eligible children include those who are economically disadvantaged, children with disabilities, migrant children, limited English proficient children, Head Start children, Even Start children, Early Reading First children, neglected or delinquent children, and homeless children.

They are identified by the school as failing or most at risk of failing, to meet the State’s challenging student academic achievement standards on the basis of multiple, educationally related, objective criteria established by the school. Children from preschool through grade 2 shall be selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures.

However, funds received under this part may not be used to provide services that are otherwise required by law to be made available to children described above but may be used to coordinate or supplement such services.

Title X, Part C – Education for Homeless Children and Youth

Children eligible for these services are children who lack a fixed, regular, and adequate nighttime residence [within the meaning of Section 103(a)(1)]; and include

(i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;

(ii) children and youth who have a primary night-time residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings [within the meaning of Section 103(a)(2)(C)];

(iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii) indicated above.

A child who is homeless and attending any school operating a Title I schoolwide delivery model, operating a Title I targeted assistance model, or not operating as a Title I school in the district) is eligible for Title I services. Homeless children attending either a school operating as a schoolwide or as a targeted assistance Title I school may receive Title I services from said program. However, the school district must reserve (set aside) a portion of Title I funds needed to provide services for homeless children attending a non-Title I school. Services for students experiencing homelessness in a non-Title I school must be comparable to the Title I services received by eligible children (homeless and non-homeless) in a Title I school.

In addition, a school district receiving Title I, Part A, funds must describe how the district will coordinate with the Title X, Part C, McKinney-Vento Homeless Assistance Act when filing its annual consolidated or Title I application with the SEA. [USED Guidance M-1; No Child Left Behind Act of 2001 (NCLB), Title I, Part A, Section 1111(a)(1) and Section 1112(a)(1)]

Questions and Answers

1. **Are homeless children and youth eligible to receive Title I, Part A, services?**

   Yes. Homeless children and youth are automatically eligible for services under Title I, Part A, of the No Child Left Behind Act of 2001 (NCLB), whether or not they live in a Title I school attendance area or meet the academic standards required of other children for eligibility. [Section 1115(b)(2)(E)] Homeless children and youth may receive Title I educational or supportive services from schoolwide and targeted assistance school programs and through the reservation of funds for homeless children enrolled in non-Title I schools.

   Although supportive services such as medical, dental, and clothing may be provided to children participating the Title I program and to children classified as homeless, the school district must first explore the availability of these services from other existing resources within the school district and community. If funds are not available from other public or private sources to provide such services, then Title I funds may be used as a last resort. [Title I, Part A, Section 1113(c)(3)(a); USED Guidance M-1]

2. **Are homeless children and youth who attend non-Title I schools eligible to receive Title I, Part A, services?**

   Yes. School districts must reserve Title I, Part A, funds in order to provide comparable services to homeless students who do not attend Title I schools. They may, for example, provide educationally related support services to children in shelters and other locations where homeless children live. These services should be provided to assist homeless students to take advantage of educational opportunities. [Section 1113(c)(3)(A)]
If appropriate, children in local institutions for delinquent children, and neglected or delinquent children in community day school programs may receive services. [Section 1113(c)(3)(C)]

The school district must coordinate its local annual consolidated application or local individual Title I, Part A, application with the plan developed by agencies under the Title X, McKinney-Vento Act. A school district may develop a formula for reserving the appropriate amount of Title I funding for homeless students. [Section 1112(a)(1); Section 1113(c)(3); USED Guidance M-3]

3. Who decides how the Title I, Part A reservation for homeless students in a non-Title I school will be calculated and how the funds will be used?

Determining the amount of the Title I, Part A, reservation and how the funds will be used should be a coordinated process involving the local homeless education liaison, the Title I coordinator, and other appropriate school district personnel. If all identified homeless children attend schools receiving Title I, Part A, funds, in a given year, an additional amount does not need to be reserved. However, if homeless children become enrolled in a non-Title I schools, later in the school year, an amount as necessary shall be reserved. The Title I coordinator and the local homeless education liaison should discuss the services provided.

When determining how funds will be used, the needs assessment found in Appendix F of the Local Homeless Education Liaison Toolkit may be used to promote a discussion of unmet needs and determining the most appropriate local use of Title I, Part A, funds to assist in meeting these needs.

4. What types of services may school districts provide to homeless students with funds reserved under Section 1113(c)(3) of Title I, Part A?

School districts may use funds reserved under this section to provide services to eligible homeless students in both Title I and non-Title I schools. Services provided to the homeless students must be comparable to services provided to other eligible students receiving Title I services. This includes providing educationally related support services to children in shelters and other locations where these children may live. Services provided should assist such children in meeting challenging, academic content and achievement standards.

Services do not need to be the same as those typically provided with Title I funds, but they must be comparable. School districts have the discretion to use reserved funds to provide homeless students with services that are not ordinarily provided to other Title I students and that are not available from other sources. The following activities are examples of appropriate uses for Title I, Part A, funds that school districts may consider when serving children and youth experiencing homelessness:

a) Tutoring, extended day and summer activities, and other educational services that help homeless children and youth reach the same challenging content and student performance standards to which all children in Iowa are held. As clearly specified in NCLB, all academic enrichment programs for
disadvantaged students, including programs for homeless students, must be aligned with State
standards and curricula.

b) Programs and other activities designed to raise awareness among educators and pupil services
personnel of the rights of homeless children and youth under the McKinney- Vento Act, and the
special needs such children and youth have as a result of their homelessness.

c) School supplies or items of clothing needed to meet a school’s dress or uniform requirement so that
students may effectively take advantage of educational opportunities. [USED Guidance M-4, L-1]

5. **Can Title I, Part A, funds be used to serve homeless students in middle or high school if the school
district typically uses these funds for elementary schools?**

Yes. The purpose of the homeless reservation of funds is to serve students experiencing homelessness who
are *not* attending Title I schools. Targeting grade levels not served by Title I is also an appropriate use of
this reservation of funds.

6. **Can Title I, Part A, funds be used to provide transportation to the school of origin for students
experiencing homelessness?**

No. Transporting students to or from their school of origin while they are homeless is a requirement under
the McKinney-Vento Act. Title I, Part A, funds cannot be used for this service because it would be
considered supplanting one source of federal funds for another source of federal funds. USED guidance
states that transportation becomes an option once the homeless student is permanently housed, making the
use of Title I, Part A, funds allowable.

7. **If a homeless child becomes permanently housed during a school year, is that child eligible to receive
Title I, Part A, services for the remainder of that school year?**

Yes. In general, a homeless child or youth who becomes permanently housed during a school year
continues to remain eligible for Title I, Part A, services for the remainder of that school year. This helps
ensure educational stability for formerly homeless children. For example, it may be appropriate in certain
circumstances for a school district to use Title I, Part A, funds to transport *formerly* homeless students to or
from their school of origin for the remainder of the school year in which they become permanently housed.

8. **Does a State’s academic assessment system need to include homeless students?**

Yes. The final regulations that implemented changes to the standards and assessment requirements of Title
I, Part A, require states to include homeless students in their academic assessment, reporting, and
accountability systems. Assessments of homeless students are to be included in the school district of
enrollment for participation rate if enrolled at the time of testing and for proficiency if enrolled for a full
academic year. [Section 1111(b)(3)(C)(xi)]
States are not required to disaggregate, as a separate category, the assessment results of homeless students. However, the option of a flag can be used to identify the results of the homeless students and track their performance on the Iowa Assessments. The McKinney-Vento subgrantee school districts must report the Iowa Assessments performance of students experiencing homelessness as part of their annual report.

As homeless children and youth fall at the low end of the poverty continuum, school districts and the states should include the assessments of homeless students in the economically disadvantaged category of disaggregation, in addition to other applicable categories (e.g., the “all student category”). [USED Guidance M-5]

9. Must Title I, Part A, funds be reserved if no homeless children have been identified by the school district?

If the school district has not identified homeless children and youth it is not required to reserve Title I, Part A, funds provided the following McKinney-Vento Homeless Education Assistance Improvement Act of 2001 requirement for outreach and identification have been met:

• The local school district has appointed a homeless liaison.
• Public notice of the educational rights of homeless children and youths is disseminated where such children and youths receive services under the McKinney- Vento Act, such as schools, family shelters, and soup kitchens.
• The liaison collaborates with local services providers such as social services, shelter staff, and other community support services to ensure identification of homeless children and youth.
• The school district has established a process to identify homeless students in its local student data record system.

10. What are some strategies that facilitate coordination and collaboration between Title I, Part A, and the Title X, Part C?

The following suggestions were generated during the 2001 Symposium on Homeless Education and Title I that was hosted by U.S. Department of Education and the National Center for Homeless Education:

• Include local homeless education liaisons at Title I conferences and in-services, and Title I coordinators at homeless education conferences and in-service professional development events.
• Ensure collaboration between local Title I coordinators and local homeless education liaisons to identify ways that Title I will serve children and youth experiencing homelessness as described in the local district Title I application.
• Ensure collaboration between the state Title I director and the state McKinney-Vento coordinator on the state Title I plan or the state consolidated plan.
• Share Title I, Part A, and Title X, Part C, education handbooks, when available, and other resources with program staff serving Title I and homeless students.
• Collect and share within and across school districts concrete data on the needs of children and youth in homeless situations.
• Initiate school district efforts to make organizational accommodations for eligible students, as necessary, in such areas as transportation, remaining in the school of origin, records transfer, class scheduling, and special services that will help them enroll, attend, and succeed in school.
• Ensure that the needs of highly mobile students are included in the school improvement plans and not addressed as a separate issue.
• Establish and widely disseminate information on district-wide policies, procedures, and guidelines to identify and serve eligible students.
• Consider local homeless education liaison representation on the State Committee of Practitioners.
• Include homeless parents in Title I parental involvement policies and create opportunities for homeless parents to be involved.

Adapted from:

The No Child Left Behind Act of 2001, Public Law 107-110-January 8, 2002
Iowa Department of Education

Migrant Education Program (MEP)
Title I, Part C of NCLB

Note: The Migrant Education program application must be completed by the LEA and approved by the SEA in order to receive Title I, Part C funding.

For migrant education program technical assistance, contact Susan Selby at 515/281-4732, susan.selby@iowa.gov.

This Migrant Education program application must be completed by Applicant Agencies that have received prior approval by the State Education Agency (SEA) to receive Part C of Title I - Education of Migratory Children funding. This application may be accessed through the Title I electronic Internet application at https://portal.ed.iowa.gov. The Iowa Department of Education Iowa Education Portal site will appear. On the blue navigation menu bar, highlight “A&A Account” and click on “Sign In.” On the “Sign In” tab, enter your Account ID (email address) and password to sign into DOE – Education Portal. Click the “Sign In” button. The user should click Title I to access the Migrant application forms. The due date for submission of the Title I electronic Internet application is September 15.

The Migrant Education Assurances, School Year Measurable Program Outcomes, Migrant Budget, Migrant Staff Assignments, Summer Measurable Program Outcomes, Private School Statement of Agreement, and Migrant Narrative forms together with the LEA’s Title I Annual Application and the LEA’s Comprehensive School Improvement Plan, (which is now part of C-Plan), encompass the basic requirements of the Title I legislation connected with the education of migratory children including assurances, lobbying and debarment, student data, and budget.

Note: LEAs receiving Title I Migrant Education funding must participate in the development of the LEA’s Comprehensive School Improvement Plan.

CONTACTS SCREEN

Note: The Contacts screen must be completed in order to proceed with the application process.

The Contacts screen is where the Title I coordinator will enter contact information in the available areas. The contact person is the individual who will be contacted about information given in this application.

The user will see a listing of the Title I application programs that pertain to their local education agency and may see information listed for the last Title I contact of record. The user will have the option to click the Delete button if the contact information is incorrect or the Edit button to update the contact information or leave it as listed. Please verify the contact person’s e-mail address, name, mailing address, office telephone number, and title.
Click Title I Home to return to the main program screen and click on "Migrant."

Migrant Assurances

Click on “Migrant Assurances” from the Migrant Program menu.

**Migrant Assurances**

Click on “Migrant Assurances” from the Migrant Program menu.

---

LEA Assurances

The authorized agent assures the Department of Education, State Education Agency (SEA) that this project will comply with all applicable statutory and regulatory requirements and also assures that this project and its assigned and participating Local Education Agencies (LEAs) will do the following:

1. Identify and address the unique educational needs of migratory children in accordance with the comprehensive State plan that is integrated with other programs funded under the No Child Left Behind Act of 2001, to provide migratory children with an opportunity to meet the same challenging State academic content standards and challenging State student academic achievement standards that all children are expected to meet.

2. Specify which strategies and measurable program goals and outcomes in which it will participate.

3. Provide supplementary services that go beyond the full range of services that are available for migratory children from other appropriate local, State, and Federal programs assuring that migrant services supplement, not supplant, said services for which the migrant students qualify.

4. Conduct joint planning with parents and with other local, State, and Federal programs including programs under Title I, part A; early childhood education programs, and language instruction education programs.

5. Take part in the statewide needs assessments using needs assessment surveys and other instruments developed by the SEA to document the individual assessment of students’ needs for use in program planning.

6. Provide support services first to migratory children whose education has been interrupted during the regular school year and who are failing, or most at risk of failing, to meet the State’s challenging academic content standards and challenging student academic achievement standards.

7. Provide available and applicable data to the SEA that reflects the educational performance findings of all enrolled migratory students.

8. Collect and report to the SEA local evaluation information for the SEA’s annual evaluation and use the evaluation information to improve the LEA migrant education program.

9. Demonstrate comparability of services by the LEAs having established: (a) a district-wide salary schedule; (b) a policy to ensure equivalence among schools in teachers, administrators and auxiliary personnel; and (c) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

10. Design programs and projects that are of sufficient size, scope and quality to give reasonable promise of substantial progress toward meeting the special educational needs of the children being served.

11. Maintain such records as may be required for program and fiscal audits.

12. Assure and assist in inviting all migrant parents to participate in the school district Parent Advisory Council (PAC). Documentation in the form of meeting minutes, agendas, and records of attendance will become a part of the LEAs records.

13. Release migrant personnel to attend professional development that is conducted during the school year, as needed.

14. Provide technical assistance, staff development, and monitoring services.

15. Offer to provide services to eligible migrant children attending private elementary and secondary schools according with Section 1120a of PL 107-110.
16. Facilitate the transition of secondary school students to postsecondary education or employment.
17. Assist the SEA in determining the number of migratory children under section 1303(e), through such procedures as the Secretary may require.
18. Assure that duty hours for MEP funded personnel shall not exceed 100 minutes a week for full time (100%) migrant-funded LEA personnel or fifty (50) minutes a week for half time (50%) migrant-funded personnel. Personnel funded at less than 50% with migrant funds shall not perform duty hours during their limited time working with migrant students.
19. Assure that migrant students shall only be transported in accordance with State rules and regulations.
20. Assure that all MEP funded paraprofessionals meet the same qualifications as those required for paraprofessionals under Title I.

The user should review the assurances and click the box at the top of the form to certify that the local education agency will be in compliance with the assurances as stated in serving migratory children through Title I services. The user should then click the Finish button to return to the Migrant menu. The Migrant Assurances form will be at the bottom of the Migrant Home screen menu with the status “District Finished.”

Click School Year Measurable Program Outcomes form to be completed next.

**SCHOOL YEAR MEASURABLE PROGRAM OUTCOMES**

This form will be completed if the local education agency Title I migrant education project will be operated during the regular 2014-15 school year. The user should click the appropriate yes or no response.
### 1.0 Literacy

<table>
<thead>
<tr>
<th>MPO</th>
<th>Implementation Strategy</th>
<th>Describe how MEP funds will be used to implement the strategy and meet the MPO.</th>
</tr>
</thead>
<tbody>
<tr>
<td>By the end of each school year, the percentage of the LEA’s migrant students who do not meet the proficient level of the Iowa Assessments in reading will decrease by 10% from the preceding school year.</td>
<td>Align reading PD to the needs of the migrant students as documented in the local CNA</td>
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<tr>
<td></td>
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<td></td>
<td>Ensure that staff who work with migrant students receive PD to provide effective reading instruction to migrant students</td>
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### 2.0 Mathematics

<table>
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</tr>
</thead>
<tbody>
<tr>
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<td>Align math PD to the needs of the migrant students as documented in the local CNA</td>
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<td></td>
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<td></td>
</tr>
</tbody>
</table>
Once the user has responded to each of the measurable program outcomes, they should click the Finish button once. This will return the user to the Migrant Program Home screen. The user will see that the School Year Measurable Program Outcomes form has moved to the bottom of the menu and has received the “District Finished” status.

*Click the Migrant Budget to be completed next.*

**Migrant Budget**
Enter all migrant program expenses on the Migrant Budget up to but not exceeding the migrant allocation listed at the top of the budget form. Do not enter any figures in the “Total” fields, as totals will be completed as figures are entered into categories. Round all amounts to the nearest dollar. Please refer to the Title I Program General Budget section for guidance on allowable expenditures and proper budget placement of those expenditures.

The budget table shown above has been collapsed. When all information has been entered on the Migrant Budget form, the user may collapse the budget data to see an Expenditure Summary of total budget figures in each category by clicking the Collapse All button. The user may also collapse only certain budget rows by clicking at the far left of the budget table. The Migrant Budget form may be expanded by row by clicking at the far left of the row or in whole by clicking the Expand All button to reveal the regular expenditure categories.

After all detail is completed, the user should click the Finish button. The user must fix all errors appearing in RED. The user must verify the YELLOW warning errors. A yellow highlight is simply a reminder to check your work.

✔ TIP: Do NOT double-click the Finish button.

The user will be returned to the Migrant Program Home screen, which will reveal that the Migrant Budget form shows the “District Finished” status and has been moved to the bottom of the menu.

Click the Migrant Staff Assignments form to be completed next.

**MIGRANT STAFF ASSIGNMENTS**

The Staff Assignments form is required when salary amounts are indicated in the budget. If a staff count is added to the Staff Assignments form, then staff salaries must be added to the budget; and conversely, if a staff salary is included in the budget, then a staff count must be added to the Staff Assignment form. **Note:** You are not required to report FTE on the budget form.

On the Migrant Staff Assignments form, enter the number of staff assignments for which salary payments will be made from migrant education funds for services to be performed in either the regular and/or summer term. Also complete full-time equivalency (FTE) for staff assignments for the regular and summer terms. The FTE of a staff member must reflect
part of a staff member’s salary paid by migrant education. Carry this figure (FTE) to the nearest tenth of a percent (e.g. 3.4). If the local education agency receives funding for a SEA approved recruiter’s salary, please show the appropriate FTE. When reporting migrant education program staff, the user must also indicate how many within each category are Bilingual. *(Is this no longer a requirement???)*

The terms for each staff category are defined below:

Certified Teachers -- These are the teachers who have been employed to perform the teaching activities described in this application. Teachers with responsibility for any remedial reading instruction must have a reading endorsement. Any questions regarding a reading endorsement must be directed to the DE Board of Educational Examiners. **Note:** Title I math teachers need no additional endorsement.

Counselor –

Paraprofessionals (Educational Associates) – For the purposes of Title I, Part C, a paraprofessional is an employee who provides instructional support in a program supported with Title I, Part C funds. Instructional support includes individuals who (1) provide one-on-one tutoring for eligible students if such tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher; (2) assist with classroom management, such as organizing instructional and other materials; (3) provide instructional assistance in a computer laboratory; (4) conduct parental involvement activities; (5) provide support in a library or media center; (6) act as a translator; or (7) provide instructional support services under the direct supervision of a teacher. **Note:** Individuals who work in food services, cafeteria or playground supervision, personal care services, non-instructional computer assistance, and similar positions are not considered paraprofessionals under Title I.

Recruiters –

Records Transfer Staff –

Administrators –

✔ **TIP:** Be sure to click the Save button to save data before moving on to the next section.
Enter the total number of paraprofessionals funded from Title I migrant education funds that will provide Title I instructional services to migrant students.

There are no extensions of the highly qualified requirement; a paraprofessional must be highly qualified upon employment. This is a requirement that the U.S. Department of Education is closely monitoring. To be considered highly qualified, a paraprofessional must have met one of the following criteria: completed two years of study at an institution of higher education; or obtained an associate’s (or higher) degree; or obtained voluntary para-educator certification through the Iowa Board of Educational Examiners; or completed district determined assessments such as Work Keys, COMPASS, etc.

All Title I paraprofessionals must have a secondary school diploma or its recognized equivalent. This includes paraprofessionals who serve as translators or who conduct parental involvement activities.

For more information on qualified paraprofessionals, please refer to the Title I Paraprofessionals Guidance on the Iowa Department of Education web site at https://www.educateiowa.gov/pk-12/learner-supports/paraed.
Please enter the number of paraprofessionals broken out by level. The sum of the “Educational Level” numbers should equal the sum of the “Migrant Paraprofessionals” total above. Click the Finish button to save data and perform edit validations. If no error messages are received, see the next paragraph to determine the need for the following staff certification documents or you may proceed to the next form in your Migrant application process.

✔ TIP: Do NOT double-click the Finish button.

A requirement from the U.S. General Accounting Office requires time sheets or work logs to be maintained for ALL staff paid from federal sources. Local education agencies with Title I staff funded from a single federal funding source, may use a certification form similar to the sample following. LEAs must document split funded or partial funded Title I positions on time sheets or work logs similar to the following sample. Please note that this documentation represents a semi-annual certification of time and effort rather than just hours on paper; and should be signed after the fact, to authenticate the certification process. If you have questions regarding the use of these forms, please contact the auditor for your district.
Certification for Employee Funded from Federal Funding Source
XYZ Community School District

I am an employee of the XYZ Community School District. During the 2011-2012 school year, I am aware of my position and funding as shown below.

I understand that if my “Status” is listed below as “Single” which indicates all of the funding for my position is through one federal funding source, I am required to sign this certification at the end of each semester.

I understand that if my “Status” is listed below as “Multiple” which indicates I am funded through more than one federal funding source, I am required to submit an activity sheet for split funded employee’s each pay period throughout the year.

<table>
<thead>
<tr>
<th>ID</th>
<th>Name</th>
<th>Bldg</th>
<th>Position</th>
<th>FTE</th>
<th>Funding</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>0405</td>
<td></td>
<td>0405</td>
<td>In Cls Reading</td>
<td>1.0</td>
<td>Title I</td>
<td>Single</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ID</th>
<th>Name</th>
<th>Bldg</th>
<th>Position</th>
<th>FTE</th>
<th>Funding</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>0409</td>
<td></td>
<td>0409</td>
<td>In Cls Reading</td>
<td>.50</td>
<td>Drop Out Prevention Title I</td>
<td>Multiple</td>
</tr>
</tbody>
</table>

The duties I performed during the first semester were exclusively related to the funds listed above.

Employee Signature

Date

Supervisor Signature

Supervisor Title

Date

The duties I performed during the second semester were exclusively related to the funds listed above.

Employee Signature

Date

Supervisor Signature

Supervisor Title

Date

This form will be retained in the principal/supervisor’s office for 3 years.
Activity Sheet for Split Federally Funded Staff  
XYZ Community School District

I am an employee of the XYZ Community School District. During the 2011-2012 School Year, I am aware of my positions and funding as shown below. I understand that because I am funded through more than one funding source I need to turn in the following activity sheet for every pay period.

Pay Period Dates:

<table>
<thead>
<tr>
<th>ID</th>
<th>Name</th>
<th>Bldg</th>
<th>Position</th>
<th>FTE</th>
<th>Funding</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>00</td>
<td>IN CLS READING</td>
<td>0.50</td>
<td>DROP OUT PREVENTION</td>
<td>Multiple</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Week 1

<table>
<thead>
<tr>
<th>DATE</th>
<th>SAT</th>
<th>SUN</th>
<th>MON</th>
<th>TUE</th>
<th>WED</th>
<th>THR</th>
<th>FRI</th>
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<tbody>
<tr>
<td># of hours</td>
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Week 2

<table>
<thead>
<tr>
<th>DATE</th>
<th>SAT</th>
<th>SUN</th>
<th>MON</th>
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<th>Status</th>
</tr>
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<tbody>
<tr>
<td>00</td>
<td>IN CLS READING</td>
<td>0.50</td>
<td>TITLE I</td>
<td>Multiple</td>
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<td></td>
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Week 2

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<td></td>
<td></td>
</tr>
</tbody>
</table>

Employee Name | Employee Signature | Date

Principal/Supervisor Signature | Date

Absence Codes

<table>
<thead>
<tr>
<th>Code</th>
<th>Duration</th>
<th>Time Expectations for 7.75 hour day</th>
<th>Time Expectations for 7.50 hour day</th>
</tr>
</thead>
<tbody>
<tr>
<td>B</td>
<td>Bereavement</td>
<td>1.0 – 7.75 hours</td>
<td>1.0 – 7.5 hours</td>
</tr>
<tr>
<td>EM</td>
<td>Emergency</td>
<td>0.9 – 7 hours</td>
<td>0.9 – 6 hours, 45 minutes</td>
</tr>
<tr>
<td>F</td>
<td>Funeral</td>
<td>0.8 – 6 hours, 10 minutes</td>
<td>0.8 – 6 hours</td>
</tr>
<tr>
<td>H</td>
<td>Holiday</td>
<td>0.7 – 5 hours, 30 minutes</td>
<td>0.7 – 5 hours, 15 minutes</td>
</tr>
<tr>
<td>I</td>
<td>Personal Illness</td>
<td>0.6 – 4 hours, 40 minutes</td>
<td>0.6 – 4 hours, 30 minutes</td>
</tr>
<tr>
<td>J</td>
<td>Jury Duty</td>
<td>0.5 – 3 hours, 52 minutes</td>
<td>0.5 – 3 hours, 45 minutes</td>
</tr>
<tr>
<td>O</td>
<td>Other</td>
<td>0.4 – 3 hours, 05 minutes</td>
<td>0.4 – 3 hours</td>
</tr>
<tr>
<td>PB</td>
<td>Personal Business</td>
<td>0.3 – 2 hours, 15 minutes</td>
<td>0.3 – 2 hours, 15 minutes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.2 – 1 hour, 35 minutes</td>
<td>0.2 – 1 hour, 30 minutes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>0.1 – 45 minutes</td>
<td>0.1 – 45 minutes</td>
</tr>
</tbody>
</table>

This form will be retained in the principal/supervisor’s office for 3 years.

The user will be returned to the Migrant Program Home screen and the Migrant Staff Assignments form will have moved to the bottom of the menu and will display the "District Finished" status.

Click the Summer Measurable Program Outcomes form to be completed next.
SUMMER MEASURABLE PROGRAM OUTCOMES

If the local education agency will not offer a Title I migrant summer school session in 2015, click "No" and click the Finish button. The user will receive the “DistrictFinished” status and may move on to the next form in the menu.

If the local education agency has been approved by the State Title I office to offer a summer school for migrant students, the user must complete this form. First click “Yes” and then enter the anticipated dates for the 2015 migrant summer school session (mm/dd/yyyy – mm/dd/yyyy).

Place a check next to each assessment that will be used to assess measurable program outcomes for the summer reading and/or math program funded with Title I migrant education funds.
1.0 Literacy

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Describe the components of the LEA's Migrant Education Program that are designed to increase the proficiency level of its migrant students and contribute to the achievement of the State's performance targets for reading.

2.0 Mathematics

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</table>

Describe the components of the LEA's Migrant Education Program that are designed to increase the proficiency level of its migrant students and contribute to the achievement of the State's performance targets for math.

Insert appropriate text here.
Once the user has entered a response in each box as requested, click the Finish button once. The user will be returned to the Migrant Program Home screen and will be able to confirm that the Summer Measurable Program Outcomes form has received the “District Finished” status and been moved to the bottom of the menu.

If the district has one or more accredited private schools within the boundaries of the LEA, the user must complete the Statement of Agreement form for each private school. The purpose of this form is to certify that consultation took place between the public and private school and that the public school offered to provide educational services to support eligible migrant students enrolled in private schools with activities funded through Title I, Part C funds allocated to the LEA.

Click on the Statement of Agreement form, as applicable, or the Migrant Narratives form.

**STATEMENT OF AGREEMENT**

The Statement of Agreement form includes a separate form for each accredited private school within the LEA. The name of the private school and the name and title of the authorized private school representative will be automatically entered on the form. The status information on the Migrant Program Home screen will give an update of the progress of the district in completing the required steps of the Statement of Agreement process and will give a final outcome for each consultation.

Districts that have eligible private schools within their boundaries must respond to the questions regarding private school participation for each private school within the LEA boundaries. The private school start date and the date of timely and
meaningful consultation between public and private school officials must be completed. **Note:** The date of the consultation regarding Title I migrant services must be, at a minimum, before the first day of school for the private school.

If the private school has declined Title I migrant service, select “No” for the last two questions and enter the date Title I services were declined by the private school. Click the Finish button. The Migrant Program Home screen will change the status to “Waiting on private school” and automatically send an email to the private school official. The private school will be asked to verify that, at minimum, a conversation took place in which the private school declined Title I service for the current school year.

If the private school has attended the consultation and accepted Title I service, select “Yes” for the last two questions. The following table will automatically appear.

Section 200.63 of the Title I regulations address the minimum components that must be discussed as part of timely and meaningful consultation. Timely is defined as before the private school starting date. Meaningful is defined as all key components were discussed. The public school must report whether these components as outlined above were included in the discussion between public and private school officials.

During consultation, remind private school officials they will receive and must respond to email. The private school official will receive an automatic email notification from the Iowa Department of Education Title I web application with instructions on how to review the private school portion of the Statement of Agreement form. It should be understood by both parties that affirmation by the private school official only indicates that each topic was discussed during the public/private school consultation; it does not imply approval of the decision of each topic. Both parties should be aware that the public school has the final say in Title I services and does not have to do all that is asked by the private school. Once the form is affirmed by the private school, the public school official will not be able to make changes to that portion of the Statement of Agreement form. **Note:** Failure on the part of the private school official to affirm the Statement of Agreement form for their private school will prevent the approval of the public school Title I migrant application.

If the district is providing service to a private school, at the first question the user should select whether the Title I services will be located at a neutral site, within the private school or within the public school. The public school representative must then select the appropriate yes or no response for each of the additional questions and click the Finish button. There must be a response to each of the items. If the response to any of the discussion components is “No” the public school must go back and continue consultation with the private school until all responses can be answered in the affirmative. Once this occurs and the user clicks the Finish button, an email will automatically forward to the private school official for review and affirmation. During this period, the status will reveal that the district is waiting for the private school to respond.
TIP: Do NOT double-click the Finish button.

An email will be sent to notify the public school representative that the private school has affirmed the Statement of Agreement and that the user may continue to work on the district’s Title I migrant application.

If the private school does not agree with the public district, an email will be sent to the public school representative stating that the private school has clicked the Deny button. If the private school official does not agree with the responses, a comment box is available for noting the concerns. If the private school official believes that any topic(s) were not discussed, they should contact the public school representative to discuss the concerns.

If the district needs to make a change on the Statement of Agreement, click the Undo button. After the district makes the changes, the private school official will receive another email. The Title I migrant coordinator and private school official must work to resolve the private school concerns and achieve affirmation. If the private school concerns cannot be resolved, the private school may file a complaint with the Iowa Department of Education. Updated information about the complaint process will be found outlined under the Title I, Part A section of the Iowa Department of Education web site at http://educateiowa.gov.

Note: Both the LEA and the private school must verify that all elements of the consultation process occurred before the LEA will be able to submit the Title I application and receive funding.

The public school representative must repeat this process for each private school within the public school boundaries in order to maintain a written record of compliance with the requirements for private school consultation and services in Section 1120 of the Title I statute and Section 200 of the Title I regulations.

If the district is serving one or more private schools, the LEA must correctly calculate equitable services for private school students regarding parental involvement requirements. This can be done either through independent parent involvement activities or in conjunction with the LEA’s activities. If they are done independently, there must be an equitable distribution of funds for these activities. The Statement of Agreement form affirmation process provides the opportunity for the private school to verify that delivery of parent involvement activities was discussed during consultation.

According to federal private school Title I services guidance, consultation between public and private school officials is intended to be an ongoing process to begin in November or December of the prior year in preparation for the coming school year and continues through October of the current school year. For further information on private school Title I programs, please refer to the Private School Guidance under Title I, Part A section of the Iowa Department of Education web site. "Ensuring Equitable Services to Private School Children," a private school toolkit is an online resource available at http://www2.ed.gov/programs/titleiparta/ps/titleitoolkit.pdf. Specific questions regarding private school service should be addressed to the appropriate Title I consultant for the user’s district.

TIP: If there is a private school within the boundaries of the LEA, the private school section of the Selection of Schools form, the Within District Targeting of Funds form, and the Statement of Agreement form must all be completed regardless of whether the LEA is providing Title I services to that private school.

The complaint procedure for private schools may be found on the Iowa Department of Education web site under Title I, Part A http://www.educateiowa.gov. Private school officials must be informed of their right to submit a written complaint to the SEA when they believe the LEA has not engaged in timely and meaningful consultation or considered the views of the private school. This does not mean that the public school must do what is asked by the private school. The public school has the final say in Title I services.
Migrant Narrative

Identification and Recruitment (ID&R)
The State of Iowa receives Migrant Education Program (MEP) funding for which Federal law mandates that the State identify and recruit all migrant students residing in Iowa who are eligible to receive services provided by the MEP. State MEP funds are then allocated to the Local Education Agency (LEA).

Please indicate which option below best describes how migrant students are identified.

- The LEA works closely with a District/Regional Recruiter
- The LEA employs a District Recruiter only

Priority for Services
To qualify for Priority for Services, a child must meet the following two criteria:
1. The child's education has been interrupted within the past 12 months
2. The child is falling, or most at risk of failing, to meet state standards

Please indicate in Table A and B the criteria your district will use to consistently determine who meets the priority for services.

Table A. Interruption during the Regular School Year
#1 - 4: 1 item MUST have a check

<table>
<thead>
<tr>
<th>Yes/No</th>
<th>Interruptions Related to Migrant Issues - During Regular School Year</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1. QAD of 08/15/14 or start of regular school year until end of current regular school year</td>
</tr>
<tr>
<td>✔ Yes</td>
<td>2. Moved from one district to another due to migrant lifestyle.</td>
</tr>
<tr>
<td></td>
<td>3. Absent for two or more weeks and then returns due to migrant lifestyle.</td>
</tr>
<tr>
<td>✔ Yes</td>
<td>4. Officially withdrawn and gone for at least two weeks and then re-enrolled due to migrant lifestyle.</td>
</tr>
</tbody>
</table>

Insert appropriate text here.
Table B. At Risk of Failing to Meet State Standards Criteria

#1-10: 1 item must have a check

<table>
<thead>
<tr>
<th>Yes/No</th>
<th>Criteria (Reference boxes to the left)</th>
</tr>
</thead>
<tbody>
<tr>
<td>○ Yes ○ No</td>
<td>1. Scored below proficient on State assessments in Reading</td>
</tr>
<tr>
<td>○ Yes ○ No</td>
<td>2. Scored below proficient on State assessments in Math</td>
</tr>
<tr>
<td>○ Yes ○ No</td>
<td>3. Scored below proficient on State assessments from other States</td>
</tr>
<tr>
<td>○ Yes ○ No</td>
<td>4. Scored below 50% tile on norm-referenced test (reading and/or math)</td>
</tr>
<tr>
<td>○ Yes ○ No</td>
<td>5. Is below grade level on any K-3 reading diagnostic assessment</td>
</tr>
<tr>
<td>○ Yes ○ No</td>
<td>6. Is behind in accruing credits toward graduation requirements</td>
</tr>
<tr>
<td>○ Yes ○ No</td>
<td>7. Classified as non-English or limited English proficient</td>
</tr>
<tr>
<td>○ Yes ○ No</td>
<td>8. Placed in a class that is not age appropriate</td>
</tr>
<tr>
<td>○ Yes ○ No</td>
<td>9. Has grades indicating below average performance in math and/or language arts</td>
</tr>
<tr>
<td>○ Yes ○ No</td>
<td>10. Repeated a grade level or course</td>
</tr>
</tbody>
</table>

Insert appropriate text here.

Describe how you will ensure that students who meet your priority for service (PFS) definition are served first.

Insert appropriate text here.
SUBMITTING THE APPLICATION

As the user progresses through the list of application forms required for their local education agency under the Migrant Program, “District Finished” will appear as the status as each form is completed.
Upon completion of all required forms, the **Submit** button will appear at the bottom of the Migrant status table on the Migrant Program Home screen. Clicking the **Submit** button will send an automatic email to notify the SEA that the district has completed the application process. **Note:** Once the LEA submits the application, no changes can be made at the local level.

If a need arises to change budget figures **prior to clicking the Submit button**, the user may click the Migrant Program Budget form on the Migrant Program Home screen and click the **Undo** button on the Migrant Budget form. This action will allow the user to make revisions to the budget as necessary. The user will need to click the **Finish** button and resolve any validation edits before again achieving the "District Finished" status.

✔ **TIP:** It is advisable to visit with the Title I office prior to using the Undo option.

The Title I staff will not proceed with processing your application until all required forms have been completed and the **Submit** button is clicked. The **Submit** button will not become available until all required forms have been completed.

**REPORTING TITLE I EXPENDITURES**

At the end of the project year, the district must declare final expenditures and complete the project budget via their Migrant application. To initiate the process to report the district's actual Title I, Part C Migrant expenditures and receive final payment, as applicable, please follow the process outlined for each Title I program (general budget, carryover budget, migrant budget, local delinquent budget, SINA budget). Please note that all Title I budgets are to be finalized prior to July 15.

The most critical step to reporting Title I expenditures is to first decide if the budget you are reporting on needs to be amended. You need to file an amendment if:

- The total expenditures are less than the approved budget amount.
- The total spent in an expenditure category exceeds the budgeted amount by more than 10 percent.
- There are reimbursable Title I expenditures not included in the approved budget.

**Note:** If the district needs to file an amendment, please follow through with that process before reporting the Title I expenditures for the program.

Once a Title I application has been approved by the program consultant and Title I administrative consultant, the district will receive an email to that effect. At this point there will only be two options: to add an amendment or finish the budget. After April 15, the **Finish** button will appear on each Title I budget to allow a district to report Title I expenditures as final.

✔ **TIP:** The **Finish** button should **NOT** be clicked until the end of the project year when expenditures have been made and the district is ready to close out the program following the process outlined in this section.
To finalize a budget, go to the budget form of the Title I application program. Work your way through the following questions to determine if your district is ready to finalize or needs to complete a budget amendment before finalizing.

Are Title I project expenditures complete? Complete means all costs approved on budget have been paid (exception: salaries and benefits, which are fixed costs).

NO - Title I project expenditures, other than salaries and benefits, are NOT complete. You must wait until all Title I expenditures have been paid to close out your budget and then start the process over by answering this question again.

YES – Title I project expenditures, other than salaries and benefits, are complete. The next question is:

Is the following a true statement: A review of our Title I expenditures shows that:
- We did not spend less than the approved budget amount;
- We do not want to spend funds for something we did not include in the approved budget; and
- Our expenditures in any category do not exceed the approved amount by more than 10%.

NO – Our expenditures do not meet all three of the conditions above. You must complete an amendment process prior to reporting Title I expenditures as final.

YES – The district Title I contact and/or business manager agree that our expenditures meet all three of the conditions above. You may click the Finish button to finalize your program for the current school year and initiate the final payment, as applicable, to your district.

✔️ TIP: You are reminded that the Finish button should not be selected until the user is certain all project budget expenditures are final and accurately listed in the project budget being certified as complete.

The local education agency is required to report Title I expenditures as final for each approved program (i.e. Title I general and carryover funds, migrant funds, local delinquent funds, SINA funds).

AMENDING A MIGRANT BUDGET
For various reasons, it may become necessary for an LEA to amend the approved budget during the project year. You need to file an amendment if:
- The total expenditures are less than the approved budget amount.
- The total spent in an expenditure category exceeds the budgeted amount by more than 10 percent.
- There are reimbursable Title I expenditures not included in the approved budget.

To complete this process, the LEA must submit an electronic amendment to the applicable approved budget of the Title I application. Note: If the district needs to file an amendment, please follow through with that process before reporting the Title I expenditures for the program.

The option for amending the Title I Migrant Program Budget becomes available electronically once the SEA approves the local delinquent budget. The following is the amendment process for the migrant budget:
5. From the Migrant Program Budget form of the Title I Migrant Program application, click the Add Amendment button.
6. Complete the new budget by changing only those numbers that need to be changed. The totals will change as the user enters each number.
7. Click the Save button to save the new amended budget; then click the Finish button to return to the Migrant Program Home screen.
8. Submit the amended budget by clicking the Submit button.

The amended budget will go through the approval process at the State Title I office. As budget amendments are approved, necessary adjustments in payments will automatically be made. When amending to reflect your actual expenditures, please wait for the amendment to be approved by the state Title I office before reporting Title I expenditures as final. Note: The original budget will be available following an amendment process by using the lookup menu on the local migrant budget form.
Complaint Resolution Process for NCLB Programs

Introduction

Among the new requirements of the Federal No Child Left Behind Act of 2001 is one that provides for “written procedures for the receipt and resolution of complaints alleging violations of law in administration” of the following programs:

- Title I, Part A (Improving Basic Programs Operated by Districts)
- Title I, Part C (Migrant Education)
- Title I, Part D (Neglected, Delinquent, At-Risk Children and Youth)
- Title II (Professional Development Program)
- Title III, Part A, Subpart 2 (School Technology Resources)
- Title VI (Innovative Education Program Strategies)
- Title VII, Part C (Emergency Immigrant Education)

Contents of a Complaint

A complaint must be in the form of an affidavit. That is, the parent/guardian’s signature must be notarized or the parent/guardian must use substantially the following form:

I certify under penalty of perjury and pursuant to the laws of the state of Iowa that the preceding is true and correct.

__________________________  ______________________________
Date  Signature

The complaint must include all of the following:

6. A statement that an identified Iowa school district or the Iowa Department of Education (herein called “IDE”) has violated a requirement of federal law applicable to one of the above-named programs.
7. A statement identifying the sections(s) of federal law that is alleged to have been violated.
8. The facts on which the complaint is based.
9. Details of any discussions, meetings, or correspondence involving the parties regarding attempts to resolve the matter raised in the complaint.
10. Contact information regarding the individual who filed the complaint, which at a minimum must include the person’s mailing address and daytime phone number.
Procedure for Filing a Complaint against a School District

10. A complaint as defined above must be filed with the IDE within ninety (90) days of an adverse decision of the school district (administration or school board). For purposes of this process “filed” means mailed with a postmark within the 90 day period to the Division Administrator, ECESE, Iowa Department of Education, 2nd Floor – Grimes State Office Building, 400 East 14th Street, Des Moines, IA 50319-0146 or faxed within the 90 day period to the Division Administrator, ECESE, at 515/281-7700.

11. Within ten (10) days of receipt of a complaint, the Division Administrator shall notify the superintendent of the school district named in the complaint that a complaint has been filed. A copy of the complaint shall be provided to the school district with a directive to respond in writing to the complaint within twenty (20) days of notification. The district’s written response shall be signed by the superintendent or his/her designee. The original shall be provided to the Division Administrator with a copy sent to the individual who filed the complaint.

12. After receiving the district’s response, the Division Administrator shall determine whether further information is required, and may seek additional information from either party.

13. Unless, in the sole discretion of the Division Administrator, the Division Administrator determines that a hearing is necessary, the matter will be considered fully submitted to the Division Administrator in writing. If the Division Administrator determines that a hearing is necessary, the procedures in 218---IAC 6.12 shall apply.

14. Once the Division Administrator is satisfied that s/he has sufficient information to prepare a final report and decision, the Division Administrator shall issue a written decision to the parties. The decision may consist of one of the following options:
   a. Dismissal of the complaint for failure to state a complaint that meets the requirements of this process and the No Child Left Behind Act.
   b. A finding on the merits of the complaint that the district did not violate any provision of pertinent federal law.
   c. A finding on the merits of the complaint that the district did violate a provision of pertinent federal law, and a specific resolution of the complaint to be undertaken by the district.

The decision of the Division Administrator is not a final decision of the IDE, and therefore, is not subject to a petition for judicial review pursuant to Iowa Code chapter 17A. Nothing herein shall be construed to render this complaint process a “contested case” proceeding under that chapter.
15. Absent the existence of exceptional circumstances or the agreement of both parties to an extension, the decision of the Division Administrator shall be issued no later than ninety (90) days of the receipt by the Division Administrator.

16. When, in the sole discretion of the Division Administrator, s/he determines that public interest requires the same, the Division Administrator may utilize the provisions of any of the following administrative rules:
   281—IAC 6.7 (Disqualification)
   281—IAC 6.10 (Consolidation – Severance)
   281—IAC 6.19 (Default)

17. All time periods listed herein mean calendar days.

18. Either party may appeal the decision of the Division Administrator to the United States Secretary of Education.

Procedure for Filing a Complaint against the Iowa Department of Education

3. A complaint as defined above alleging that the IDE has violated a requirement of federal law applicable to one of the above-named programs must be filed with the IDE within ninety (90) days of an adverse decision of an employee or agent of the IDE.

4. All procedures for filing such complaint as apply to a complaint against a school district apply here, except that if the adverse decision is from the Administrator of the Early Childhood, Elementary and Secondary Education Division of the IDE, the complaint shall be filed with the Director of the IDE.

School District Requirement

All Iowa school districts shall provide a copy of this process, free of charge, to interested residents and parents of students both upon the request of the resident or parent and when the district has been working with the resident or parent to resolve a complaint. This process allows an individual to file a complaint alleging violations of law in administration of the following programs only:

- Title I, Part A (Improving Basic Programs Operated by Districts)
- Title I, Part C (Migrant Education)
- Title I, Part D (Neglected, Delinquent, At-Risk Children and Youth)
- Title II (Professional Development Program)
- Title III, Part A, Subpart 2 (School Technology Resources)
- Title VI (Innovative Education Program Strategies)
- Title VII, Part C (Emergency Immigrant Education)

There is no parallel complaint process for any program not listed above.
Complaint Resolution Process for Private School Programs

Improving the consultation process and opening the lines of communication should result in Title I programs that are designed to better meet the needs of the private school participants. Effective and ongoing consultation may deter formal complaints to the state education agency (SEA) by private school officials; however, private school officials have the right to complain to the SEA if they do not believe their eligible children, teachers, or families are receiving equitable services. Updated information about the complaint process may also be found on the Title I, Part A page of the Iowa Department of Education web site.

If the private school official does not believe that the local education agency (LEA) engaged in timely and meaningful consultation, or that the LEA did not give due consideration to the views of the private school official, or disputes the low-income data on private school children, or for another reason does not believe that the private school children are receiving fair and equitable Title I services, the private school official may file a complaint with the SEA. The decision of the SEA may be appealed to the U.S. Secretary of Education.

Under Title I, an LEA is required to provide to eligible private school children, their Title I teachers, and their families Title I services or other benefits that are equitable to those provided to eligible public school children, their Title I teachers, and their families. Private school officials have recourse through the complaint process if they do not believe their eligible children, Title I teachers, or families are receiving equitable services. Aspects of the complaint process that the private school officials should know:

- A private school official has a right to complain to the state education agency (SEA) that the LEA did not engage in a timely and meaningful consultation process or did not give due consideration to the views of the private school officials.
- Any dispute regarding the accuracy of low-income data for private school students also can be the subject of a complaint.
- The SEA is required to have complaint procedures in place as required by Sec. 34 CFR 299.10-12. Included in these procedures is a reasonable time by which the SEA must respond in writing to the complaint.
- No later than 30 days following the written response by the SEA, or in the event the SEA fails to resolve the complaint within a reasonable period of time, the private school official may appeal the decision of the SEA to the Secretary of the U.S. Department of Education. Such appeal must be accompanied by a copy of the SEA’s written response, if available, and a complete statement of the reasons supporting the appeal.
- The Secretary must complete an investigation of the complaint and resolve the appeal within 120 days after receipt of the appeal.

Please see the previous section, *Complaint Resolution Process for NCLB Programs*, for information regarding this process.