

ESSA Title I, Part A—AP Exam Fees for Low-Income Students

This document helps local educational agencies (LEAs) determine how to use Title I, Part A funds to cover all or a portion of AP® Exam fees for low-income students.

1. Has the U.S. Department of Education (ED) confirmed that LEAs and schools may use Title I, Part A funds to cover AP and IB exam fees for low-income students under certain conditions?

Yes. ED cites American Recovery and Reinvestment Act of 2009 (ARRA) guidance on using Title I, Part A funds for AP or IB exam fees for low-income students. The questions answered in section "C. Adopting Rigorous Standards and High Quality Assessments" address the matter directly. ED confirms this guidance is applicable beyond the use of ARRA funds and applies generally to Title I, Part A.

Question C-4 (reproduced below) is particularly noteworthy:¹

C-4. May Title I, Part A ARRA funds be used to pay the cost for low-income students to take an AP or IB exam?
Title I, Part A ARRA funds may be used to pay the cost of taking an AP or IB exam for a student from a low-income family who is participating in a Title I, Part A program, provided that paying for those costs is otherwise the responsibility of the student's parents. In other words, Title I, Part A funds may be used to pay the cost of taking the exam if, absent the Title I, Part A funds, the student would not be able to access the exam. See the Department's Non-Regulatory Guidance, Title I Fiscal Issues (Feb. 2008) at C-4 (available at: ed.gov/programs/titleiparta/fiscalguid.pdf). To the extent that the LEA covers the cost of the exams for all students or the LEA has a fund to pay the cost for students from low-income families in general, Title I, Part A ARRA funds may not be used. See generally B-4 and B-7.

2. How can LEAs and schools plan to use these funds?

School districts and Title I schools may use Title I funds to cover AP Exam fees as follows:

At the LEA level, the agency may reserve funds for districtwide initiatives to help instructional programming in Title I schools. This may include paying the AP or IB exam cost for a student from a low-income family if those costs

are otherwise the parents' responsibility. The reservation and activity must be in accordance with the Title I District Plan. Funds must supplement and not supplant a state or local responsibility to cover that cost portion. This may, for example, be part of the district's parental involvement activities. A district may reallocate unused Title I funds that a school hasn't obligated in a timely manner to spend on low-income student AP Exam fees.

At the school level, the school may use Title I, Part A funds to cover a portion of AP or IB exam fees for low-income students if the funds supplement but don't supplant a state or local responsibility to cover that cost portion and are in accordance with the Title I District Plan. How the school manages the expenditure depends on the Title I fiscal model in use as follows:

- **Schoolwide.** A Title I schoolwide program under section 1114 may use Title I funds for activities that upgrade the entire educational program of the school. Payment of low-income student AP Exam fees may be a part of the program if based on identified school needs and aligned with the schoolwide plan.
- **Targeted Assistance.** A school operating a targeted assistance program under Section 1115 may use Title I funds to help eligible students meet the challenging state academic standards.² Economically disadvantaged children in Title I schools are eligible to receive services.³ A school may determine that paying a portion of an eligible student's AP Exam fees benefits eligible students and serves the intents and purposes of the law.

1. See *Guidance: The American Recovery and Reinvestment Act of 2009 (ARRA): Using Title I Part A ARRA Funds for Grants to Local Educational Agencies to Strengthen Education, Drive Reform, and Improve Results for Students* (U.S. Department of Education Office of Elementary and Secondary Education: September 2, 2009). Available at: ed.gov/policy/gen/leg/recovery/guidance/titlei-reform.pdf.

2. Note the difference between ESSA's "academic standards" and NCLB's "academic achievement standards." ESSA gives schools more latitude to identify and invest in the academic programming that meets the needs of at-risk students.

3. See Section 1115(c)(2)(A).