

# Handbook for Implementing Title I, Part A



2022 - 2023

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## Handbook Update Tracking

Updates made to this handbook will be organized in this chart.

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## Introduction of Title IA and ESSA

This handbook provides general guidance on programmatic and fiscal requirements for Title I, Part A (Title IA). It includes information about how LEAs may spend Title IA funds under ESSA. Title IA is ED's largest K-12 grant program. It provides supplemental funding to support educators improving the academic achievement of students who are economically and educationally disadvantaged. ED awards Title IA funds to State Education Agencies (SEAs), which subgrant funds to LEAs on a federal formula based on the US Census Bureau counts of school-age children from low-income families residing in each district. The purpose of Title IA is to dedicate funds to provide all children "significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps" (ESSA, Section 1001). The Federal Programs Division of the GaDOE provides a handbook with Overarching Requirements that is pertinent to ALL Federal Programs, including Title IA. These requirements include the development of the Consolidated LEA Implementation Plan (CLIP), fiscal requirements, equitable services for private schools, inventory management, cross functional monitoring, and selection of evidence-based interventions. Every effort has been made to ensure that both the Title IA Handbook and the Federal Programs Handbook are accurate and provide general guidance on programmatic and fiscal requirements for Title IA as outlined under ESSA while also referencing the Code of Federal Regulations (CFR) under the Education Department's General Administrative Regulations (EDGAR). It is important to note that additional resources can be found on the Title IA Website.

## LEA Identification and Selection of School Attendance Areas and Schools, and Allocations of Title IA Funds to School Attendance Areas and Schools

An LEA will use funds received under Title IA only in eligible school attendance areas. The term "school attendance area" means the geographical area in which the children who are normally served by that school reside. For Georgia, this includes any public, locally approved charter, or virtual school within the LEA's attendance area. The term "eligible school attendance area" means a school attendance area in which the percentage of children from low-income families is at least as high as the percentage of children from low-income families served by the LEA as a whole.

Under 34 C.F.R. 200.78(c), an LEA is not required to allocate the same per-pupil amount to each participating school. If an LEA allocates different per-pupil amounts to participating schools, the LEA must allocate a higher per-pupil amount to schools with higher poverty rates than it allocates to schools with lower poverty rates. More details regarding allocation of per-pupil amounts can be found in Steps 2 & 3 in the following paragraphs.

The Title IA Eligible Attendance Area worksheet is located on the Title IA Website as well as embedded in the GaDOE (ConApp) portal. The embedded Eligible Attendance Area Spreadsheet is completed annually when the LEA submits the Title IA budget. The spreadsheet has 14 columns that will assist the LEA in determining the Title IA eligible schools. After the Fall data collection, it is recommended the LEA utilize the spreadsheet on an annual basis to determine rank order and if a poverty threshold waiver is necessary.

The following points summarize the requirements of Section 1113 of ESEA and §200.77, and §200.78 of the Title IA regulations for identifying eligible school attendance areas; selecting those eligible areas that will participate in Title IA; and allocating Title IA funds to participating areas.

## Step 1: Determining Poverty Counts and Rank Order

Section 1113(a)(3) of ESEA and 34 C.F.R. 200.78(a)(1) require an LEA to annually rank **all** its schools from highest to lowest % poverty. School rankings are based on the percentage (not the number) of poverty children in each school.

An LEA must use the same measure of poverty to:

- Identify eligible school attendance areas and schools
- Rank each area and school
- Determine the allocation for each area and school

### General Guidelines for Determining Poverty Counts

To determine the number of public-school students from low-income families, Section 1113(a)(5)(A) of ESEA provides an LEA the option to use:

- Poverty under the *Richard B. Russell National School Lunch Act* (including free or reduced-priced meals (FRM) and Community Eligibility Provision (CEP));
- Families receiving assistance under the State program funded under Title IV, Part A of the *Social Security Act* (Temporary Assistance for Needy Families);
- Students eligible to receive medical assistance under the Medicaid program;
- Students ages 5-17 in poverty as counted in the most recent LEA-level census poverty data approved by the Department.

Note: Because census data are generally not available at the school level, if an LEA uses this measure, it would most likely be part of a composite with one or more of the above measures counted by the LEA using a composite of any of the above measures.

When the District allocates Title IA funds when it has both CEP and non-CEP schools, an LEA may use a common poverty metric to rank order its schools and allocate Title IA funds on an equitable basis. However, an LEA has three options in how it derives the common poverty metric:

- One approach is for the LEA to multiply the number of students identified by direct certification in a CEP school by the 1.6 multiplier and divide by the enrollment in the school (see Example A). Non-CEP schools will use the number of FRM applications and divide by the enrollment in the school to obtain the poverty percentage. For Title IA purposes, the relevant CEP percentage of identified students and direct certification data combined with household application in non-CEP schools are both eligible as National School Lunch Program data and are therefore considered the same common poverty metric.
- A second approach is for the LEA to use the number of students directly certified through SNAP or another direct certification measure available annually in both CEP and non-CEP schools. (see Example B).

- A third approach consists of applying the 1.6 multiplier to the number of students in CEP and non-CEP schools who are directly certified through SNAP or another direct certification measure available annually (see Example C).

### Example A

#### Within-District Title IA Allocations in an LEA with a Combination of CEP Schools and Non-CEP Schools

| Column 1     | Column 2                           | Column 3     | Column 4   | Column 5  | Column 6                    | Column 7                                   | Column 8  | Column 9                                   | Column 10                        |
|--------------|------------------------------------|--------------|--|---|-----------------------------|--|---|--|----------------------------------|
| School       | Community Eligibility School (Y/N) | Enrollment   | Community Eligibility Schools: Identified Students Data <sup>1</sup> | Non- Community Eligibility Schools: Economically Disadvantaged Students Identified by Free and Reduced-Price Meals Data | 1.6 Multiplier <sup>2</sup> | NSLP Count Used to Allocate Title IA Funds | percentage of Economically Disadvantaged Students for Title IA Allocations <sup>3</sup> | Per- Pupil Amount Used by LEA <sup>4</sup> | Title IA Allocation <sup>5</sup> |
| Lincoln      | Y                                  | 425          | 400  | N/A   | 1.6                         | 425  | 100%  | \$500                                      | \$212,500                        |
| Washington   | Y                                  | 500          | 297  | N/A   | 1.6                         | 475  | 95%   | \$500                                      | \$237,500                        |
| Adams        | Y                                  | 600          | 350  | N/A   | 1.6                         | 560  | 93%   | \$500                                      | \$280,000                        |
| Jefferson    | N                                  | 450          | N/A  | 400   | N/A                         | 400  | 89%   | \$450                                      | \$180,000                        |
| Madison      | N                                  | 400          | N/A  | 200   | N/A                         | 200  | 50%   | \$450                                      | \$90,000                         |
| Monroe       | N                                  | 500          | N/A  | 100   | N/A                         | 100  | 20%   | N/A  | \$0                              |
| <b>Total</b> | <b>N/A</b>                         | <b>2,875</b> | <b>N/A</b>   | <b>N/A</b>  | <b>N/A</b>                  | <b>2,160</b>                               | <b>75%</b>  | <b>N/A</b>                                 | <b>\$1,000,000</b>               |

<sup>1</sup>The number of students may be determined once every four years for Community Eligibility schools. Moreover, the poverty data used will likely differ from other schools. For the Community Eligibility schools, the poverty data will be, for example, direct certification (Identified Students) data (e.g., SNAP or TANF) collected at least every four years times the multiplier. For other schools, the poverty data will be from household applications and direct certification data.

<sup>2</sup>The 1.6 multiplier applies only to a Community Eligibility school.

<sup>3</sup>For a Community Eligibility school, the Column 7 figure is equal to the lesser of (a) Column 4 x Column 6 or (b) Column 3. In other words, this number may not exceed the school's total enrollment. For the non-Community Eligibility schools, the Column 7 figure is equal to Column 5

<sup>4</sup>Column 7 / Column 3.

<sup>5</sup>Column 9 x Column 7 (Note: Monroe is ineligible for Title IA, funds because its poverty percentage is below both the LEA's average and 35%.)

**Example B**  
**Using Direct Certification Data Only**  
**Within-District Title IA Allocations in an LEA with a Combination of CEP Schools and Non-CEP Schools**

| Column 1     | Column 2         | Column 3     | Column 4   | Column 5  | Column 6                     | Column 7                          |
|--------------|------------------|--------------|--|---|------------------------------|-----------------------------------|
| School       | CEP School (Y/N) | Enrollment   | All Schools: Direct Certification Data Through SNAP <sup>1</sup> | percentage of Economically Disadvantaged Students for Title IA Allocations <sup>2</sup> | Per-Pupil Amount Used by LEA | Title IA Allocations <sup>3</sup> |
| McKinley     | Y                | 750          | 500  | 67%   | \$540                        | \$270,000                         |
| Roosevelt    | N                | 640          | 400  | 63%   | \$540                        | \$216,000                         |
| Taft         | Y                | 900          | 560  | 62%   | \$540                        | \$302,400                         |
| Wilson       | N                | 675          | 400  | 59%   | \$529                        | \$211,600                         |
| Harding      | N                | 500          | 150  | 30%   | N/A                          | 0                                 |
| Coolidge     | N                | 750          | 100  | 13%   | N/A                          | 0                                 |
| <b>Total</b> | <b>N/A</b>       | <b>4,215</b> | <b>2,110</b>   | <b>50%</b>  | <b>N/A</b>                   | <b>\$1,000,000</b>                |

<sup>1</sup> The figures in Column 4 exclude, for the purposes of Title IA ranking and serving of schools, household application data for the non-CEP schools and direct certification from programs other than SNAP for all schools. (CEP schools are prohibited from collecting household applications.)

<sup>2</sup> Column 4 / Column 3.

<sup>3</sup> Column 4 x Column 6. (Note: Harding and Coolidge are ineligible for Title IA funds because their poverty percentages are below both the LEA's poverty percentage (Column 5 total row) and 35%.)

**Example C**  
**Using Direct Certification Data and the 1.6 Multiplier in ALL Schools Within-District Title IA Allocations in an LEA with a Combination of CEP Schools and Non-CEP Schools**

| Column 1     | Column 2         | Column 3     | Column 4   | Column 5       | Column 6   | Column 7   | Column 8                                  | Column 9                          |
|--------------|------------------|--------------|--|----------------|--|--|---|-----------------------------------|
| School       | CEP School (Y/N) | Enrollment   | All Schools: Direct Certification Data Through SNAP <sup>1</sup> | 1.6 Multiplier | Poverty Count Used to Allocate Title IA Funds <sup>2</sup> | percentage Economically Disadvantaged Students for Title IA Allocations <sup>3</sup> | Per-Pupil Amount Used by LEA <sup>4</sup> | Title IA Allocations <sup>5</sup> |
| McKinley     | Y                | 750          | 500  | 1.6            | 750  | 100%   | \$333.00                                  | \$250,000                         |
| Roosevelt    | N                | 640          | 400  | 1.6            | 640  | 100%   | \$313.00                                  | \$200,000                         |
| Taft         | Y                | 900          | 560  | 1.6            | 896  | 99%  | \$313.00                                  | \$280,000                         |
| Wilson       | N                | 675          | 400  | 1.6            | 640  | 95%  | \$310.00                                  | \$198,400                         |
| Harding      | N                | 500          | 150  | 1.6            | 240  | 48%  | \$298.33                                  | \$71,600                          |
| Coolidge     | N                | 750          | 100  | 1.6            | 160  | 21%  | N/A                                       | 0                                 |
| <b>Total</b> | <b>N/A</b>       | <b>4,215</b> | <b>2,110</b>   | <b>N/A</b>     | <b>3,326</b>   | <b>79%</b>   | <b>N/A</b>                                | <b>\$1,000,000</b>                |

<sup>1</sup> The figures in Column 4 exclude, for the purposes of Title IA ranking and serving of schools, household application data for the non-CEP schools and direct certification from programs other than SNAP for all schools. (CEP schools are prohibited from collecting household applications.)

<sup>2</sup> The Column 6 figure is equal to the lesser of (a) Column 4 x Column 5 or (b) Column 3. In other words, this number may not exceed the school's total enrollment.

<sup>3</sup> Column 6 / Column 3.

<sup>4</sup> If the application of the 1.6 multiplier results in more than one school at 100% poverty, an LEA may allocate a higher per-pupil amount to the school with the larger percentage of directly certified students. (This appears on column 13 of template on Eligible Attendance Area worksheet found on the "Other Resources" Web page of Title IA Website.)

<sup>5</sup> Column 6 x Column 8. (Note: Unlike in Example B, Harding is now eligible for Title IA funds because its poverty percentage is at least 35%; Coolidge remains ineligible for Title IA funds because its poverty percentage is below both the LEA's average (Column 7 total row) and 35%.)

The following is a sample of schools in rank order within an LEA that uses FRM as the poverty measure. In this example, the LEA ranks its schools in order of poverty **without** regard to the grade-span that they serve.

**Table 1. Ranking Schools by Their Poverty Percentage**

| Public School     | Grades Served | Enrollment    | Eligible for FRPL | Poverty percentage |
|-------------------|---------------|---------------|-------------------|--------------------|
| A                 | K-5           | 600           | 456               | 76.0%              |
| G                 | K-5           | 425           | 200               | 47.1%              |
| C                 | K-5           | 400           | 185               | 46.3%              |
| D                 | K-5           | 450           | 190               | 42.2%              |
| O                 | 6-8           | 750           | 300               | 40.0%              |
| B                 | K-5           | 500           | 195               | 39.0%              |
| F                 | K-5           | 400           | 150               | 37.5%              |
| I                 | K-5           | 560           | 200               | 35.7%              |
| E                 | K-5           | 450           | 160               | 35.6%              |
| H                 | K-5           | 600           | 206               | 34.3%              |
| N                 | 6-8           | 800           | 260               | 32.5%              |
| P                 | 6-8           | 840           | 250               | 29.8%              |
| Q                 | 9-12          | 2,600         | 700               | 26.9%              |
| M                 | K-5           | 450           | 100               | 22.2%              |
| L                 | K-5           | 425           | 75                | 17.6%              |
| J                 | K-5           | 420           | 70                | 16.7%              |
| K                 | K-5           | 395           | 65                | 16.5%              |
| <b>LEA Totals</b> |               | <b>11,065</b> | <b>3,762</b>      | <b>34.0%</b>       |

**Feeder Pattern**

Secondary Schools have the option of following guidelines above or following a feeder pattern. The feeder pattern is determined by applying the average percentage of public-school students from low-income families enrolled in the elementary schools that feed into the secondary school to the number of students enrolled in the secondary school.

**Poverty Options for FY23**

An LEA uses the most recently available data (enrollment and poverty), which typically will be from the previous year’s October Full Time Equivalent (FTE) enrollment and poverty count. However, due to the novel Coronavirus disease 2019 (COVID-19), the U.S. Department of Agriculture’s (USDA’s) Food and Nutrition Service (FNS) issued a suite of nationwide waivers (USDA waivers) that are effective through June 30, 2022, to support access to nutritious meals while minimizing potential exposure to COVID-19 during school year 2021-2022. As a result of COVID-19 related complications, many local education agencies (LEAs) that chose to participate in the USDA waivers will not have National School Lunch Program (NSLP) data, which ordinarily would have been collected through household applications during school years (SYs) 2020-2021 and 2021- 2022. The U.S. Department of Education (ED) updated a fact sheet for state education agencies (SEAs) and LEAs to successfully implement their ESEA programs during SYs 2021-2022 and 2022-2023 when complete NSLP data from SYs 2020-2021 and 2021-2022 are not available due to participation in

USDA waivers. ED has given specific guidance for FY23 which is located on their [Fact Sheet](#), which can also be found on the Title IA website.

### **Rezoning, Opening and/or Closing Schools**

When an LEA has a situation in which there is a change in the makeup of schools from one fiscal year to the next due to rezoning or opening of a school(s), the LEA will use the same type data as previously discussed for enrollment and poverty. The difference is the LEA must track each student from the previous school using the enrollment data. The LEA does have the option to wait and use the current year's FTE and poverty data and submit the budget after the data collection period.

### **Gathering Data - Enrollment and Poverty Numbers Using Free and Reduced Meals**

When an LEA rezones schools, the actual October FTE data from the year the rezoning occurs or adjusted October FTE data from the year prior to rezoning must be used to identify and select participating areas and schools.

- If an LEA opts to use actual October FTE data from the year the rezoning is in place, an LEA must wait until the October FTE data is verified before completing the Public-School Allocations tab. This tab is located in the Title IA Improving Academic Achievement program within the ConApp.

The information from the October FTE data that is used on the Public-School Allocations Tab would then be used for two consecutive years, unless an LEA redistricts again during that same year.

- If an LEA opts to use adjusted October FTE data from the previous year, adjustments must be made to the data that accurately reflect enrollment as if the new rezoning was in existence on the date of the previous year's October FTE count. When making these adjustments, students remain in the grade in which they are counted for the previous year's FTE data; they are not rolled up to the next grade level. Prior to creating the adjusted enrollment for each school, the following information must be gathered: October FTE enrollment data (including Pre-K) for the year prior to rezoning schools; names, addresses, and grade levels (Pre-K will later be subtracted) of students affected by changes in school assignment (with assistance from the LEA's transportation department); and the October FRM eligibility status of students affected by changes in school assignment (with assistance from the LEA's school nutrition department). After gathering this data, the attendance area information is determined as follows:
  - Record the October FTE enrollment number by school for all schools that are affected by enrollment changes.
  - Find an original grand total of the October FTE numbers for all schools prior to any changes being made to school enrollment.

- Based on the new attendance area and the addresses of students, add students who will reside in the new attendance zone of each school during the next fiscal year but were not enrolled in that school during the current fiscal year. Subtract these students from the FTE data for the school where they were enrolled during the current fiscal year. Once all students who are affected by the rezoning have been added to the school they would attend (if the new rezoning was in place) and subtracted from the school they currently attend, then the total would be the new enrollment number for each school.
  - Find a grand total for the newly created enrollment for all schools and verify that this grand total matches the original grand total for all schools prior to changes being made. If the numbers match, the enrollment on the adjusted enrollment pages for each school (minus Pre-K) will be the number used for the Title IA Eligible Attendance Area Worksheet embedded in the ConApp. The adjusted numbers will be recorded in the Title IA Improving Academic Achievement program on the Public-School Allocations Tab.
  - Record the October FRM eligibility status by school for all schools that are affected by enrollment changes.
  - Total the October FRM numbers for all schools prior to any changes being made to the FRM status of each school.
  - Match the October FRM status of each student transferring into or out of a school based on the new attendance zone. Add students who qualify for FRM to the schools they would attend if the new rezoning was in place, and subtract students qualifying for FRM from the schools they currently attend based on the new rezoning.
  - Find a grand total for the newly created October FRM status for all schools and verify that this number matches the original October FRM eligibility number. If the numbers match, the October FRM status on the adjusted meal eligibility for each school will be the number (minus Pre-K) used for the ConApp. The number will be recorded in the Title IA Improving Academic Achievement program on the Public-School Allocations Tab.
- **Important to Remember:**
    - To properly account for the rezoning of students to the appropriate locations, the following must occur. Students moving from schools that are **closing** as part of the rezoning should be tracked to the school where they would have attended the year the school closed. The number of students (enrollment) and number of poverty students should be added to the school in which the students would have attended the year the school closed. This includes students that are set to move up a grade or to graduate. The goal is to match back to the previous year's October counts.
    - Newly enrolled out of county students should **not** be added to the enrollment of a **new** school. The enrollment and poverty numbers counted for a new school should only be the students that are rezoning into the new school from other schools within the district.
    - In all situations where there has been rezoning, adding, or closing of schools within the district the total enrollment and poverty numbers after tracking of the students should match (equal) the total enrollment and poverty numbers from the previous year's October FTE and FRM reports. In other words, no new student should be added or removed from the October FTE and FRM reports.

- LEA's must ensure that closed schools are removed from the Manage Public Schools tab located within the ConApp.

**Gathering Data - Enrollment and using CEP Number Procedures**

- Merging two schools into existing school (entire school population) within a cluster: Add the enrollment for the two schools (using the previous October FTE count) together for a total enrollment. The School Nutrition Program will use this new enrollment number to complete Part 2 of the Identified Student percentage (ISP) Determination Worksheet to determine the school's CEP count and place it on the Title IA Data – CEP form. The LEA will complete the form with revised numbers and upload into the Portal the information for the enrollment and CEP changes.

**Example**

| School                     | Enrollment | CEP Number |
|----------------------------|------------|------------|
| School A (Existing School) | 506        | 286        |
| School B (Closing)         | 333        | 190        |
| Combined Totals            | 839        | 476        |

- Two schools closing and opening a new school: Add together the previous October FTE count for the schools that are closing. The School Nutrition Program will use this new enrollment number to complete Part 2 of the ISP Determination Worksheet to determine the new school's CEP count and place it on the Title IA Data – CEP form.
- One school with students moving to several schools: Using the previous October FTE count, the Title IA department will create a spreadsheet showing a list of students and which schools (by school name) they will be attending next school year. The Title IA department could also create a table/spreadsheet showing the revised October FTE counts for each school affected by the student movement and furnish these revised October FTE counts to the School Nutrition Program. Please keep in mind, newly enrolled or withdrawn students since the previous October FTE count should not be considered in the revised enrollment. Only existing students from the previous October FTE count are considered for the new enrollment count at each school. The School Nutrition Program will then use this new enrollment number for each school to complete Part 2 of the ISP Determination Worksheet to determine each school's CEP count and place it on the Title IA Data – CEP form.
- The LEA must keep all documents on file that were used to redistrict/rezone students. The Title IA Education Program Specialist may request the LEA to upload documents to verify numbers onto the Title IA Attachment Tab within the ConApp. This documented may be requested during Cross-Functional Monitoring.

## Step 2: Identifying Eligible Schools

Under Sections 1113(a)(2)(B) and 1113(b)(1)(A) of ESEA, a school is eligible for Title IA funds if its poverty percentage is as high as the LEA's poverty percentage or, at the LEA's discretion, at least 35%. For example, if an LEA's poverty percentage is 30%, any school in the LEA that has a poverty percentage of at least 30% is eligible. In contrast, for an LEA with a poverty percentage of 35% or greater, the schools that are eligible for Title, Part A are those with a poverty percentage that equal or exceed the LEA's poverty percentage unless the LEA chooses to make eligible all schools with a poverty percentage of 35% or more. As discussed below under allocations, meeting the eligibility criteria does not guarantee that a school will receive Title IA funds from its LEA. Receipt of funds depends on the amount of an LEA's allocation and school poverty rankings, the per-pupil amount the LEA allocates to each school (e.g., an LEA may allocate more per pupil amount to schools with higher poverty percentages), and, in some cases, the grades that a school serves (e.g., an LEA may allocate more per pupil amount to elementary schools than high schools).

Based on the data in Table 1, Schools A, G, C, D, O, B, F, I, E, and H are **eligible** because their poverty percentage is as high as the LEA's poverty percentage of 34.0%.

After an LEA has ranked all of its schools by percentage of poverty, Section 1113(a)(3)(A) of ESEA requires the LEA to first allocate, in rank order of poverty, Title IA funds to the schools above 75% poverty, including all elementary, middle and high schools.

### Option for Certain High Schools

Under Section 1113(a)(3)(B) of ESEA, after serving all schools above 75% poverty, if funds remain, an LEA may choose to serve high schools with a poverty percentage between 50% and 75% in rank order of poverty. The implementation of this option occurs before serving any other grade-span.

### Grade-Span Option

Under Section 1113(a)(4) of ESEA and 34 C.F.R. 200.78(a)(3), after an LEA has served all of the schools with a poverty rate above 75%, if funds remain, the LEA may serve lower poverty ranked eligible schools. To determine eligibility among these schools, in addition to the district-wide ranking method illustrated above, an LEA may determine eligibility within grade spans and choose which grade span(s) to serve. In doing so, the LEA may use its district-wide percentage of poverty or the percentage of poverty data of the relevant grade span(s) (34C.F.R.200.78(a)(3)). If a grade-span poverty percentage is above 35%, the LEA may also identify as eligible any school with a poverty percentage of at least 35%. (ESEA Section 1113(b)(1)(A)).

In other words, if funds remain after serving all eligible school attendance areas with above 75% average, LEAs may rank and serve eligible schools from highest to lowest poverty % either by:

1. LEA as a whole; or
2. Grade-span (ESSA Section 1113[a][4][B]). 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 to 5, 6 to 8, and 9 to 12. To the extent that an LEA has schools that overlap grade spans (e.g., K to 5, K to 8, 6 to 12), the LEA should include a school in the grade-span in which there are the greatest number of grades represented. For example, a K-8 school would be included with

other elementary schools because this K-8 school has more elementary grades (5) than middle school grades (3).

**Table 2. Ranking Elementary Schools with a Poverty Percentage of 75% or Less by Their Poverty Percentage**

| Public School                   | Grades Served | Enrollment   | Eligible for FRM | Poverty percentage |
|---------------------------------|---------------|--------------|------------------|--------------------|
| G                               | K-5           | 425          | 200              | 47.1%              |
| C                               | K-5           | 400          | 185              | 46.3%              |
| D                               | K-5           | 450          | 190              | 42.2%              |
| B                               | K-5           | 500          | 195              | 39.0%              |
| F                               | K-5           | 400          | 150              | 37.5%              |
| I                               | K-5           | 560          | 200              | 35.7%              |
| E                               | K-5           | 450          | 160              | 35.6%              |
| H                               | K-5           | 600          | 206              | 34.3%              |
| M                               | K-5           | 450          | 100              | 22.2%              |
| L                               | K-5           | 425          | 75               | 17.6%              |
| J                               | K-5           | 420          | 70               | 16.7%              |
| K                               | K-5           | 395          | 65               | 16.5%              |
| <b>Elementary School Totals</b> |               | <b>5,475</b> | <b>1,796</b>     | <b>32.8%</b>       |

Based on the data in Table 2, Schools G, C, D, B, F, I, E, and H are eligible because their poverty percentage is at least as high as the grade span's poverty percentage of 32.8%. The other schools are ineligible because their poverty percentage is lower than the grade-span poverty percentage (32.8%).

**Table 3. Ranking Middle Schools with a Poverty Percentage of 75% or Less by Their Poverty Percentage**

| Public School               | Grades Served | Enrollment   | Eligible for FRPL | Poverty percentage |
|-----------------------------|---------------|--------------|-------------------|--------------------|
| O                           | 6-8           | 750          | 300               | 40.0%              |
| N                           | 6-8           | 800          | 260               | 32.5%              |
| P                           | 6-8           | 840          | 250               | 29.8%              |
| <b>Middle School Totals</b> |               | <b>2,390</b> | <b>810</b>        | <b>33.9%</b>       |

Based on the data in Table 3, School O is eligible because its poverty percentage exceeds the grade span's poverty percentage (33.9%). In contrast, schools N and P are ineligible because the poverty percentage of each school is lower than the grade-span poverty percentage (33.9%).

### Step 3: Allocating Funds to Eligible Schools

LEAs should use the eligible attendance area worksheet embedded in the Title IA Academic Achievement section of the ConApp.

All documentation used to determine eligible attendance areas must be maintained by the LEA. Worksheets and supporting documentation must be available to auditors and/or monitors upon request.

| Column 1          | Column 2      | Column 3      | Column 4         | Column 5           | Column 6                               | Column 7   |
|-------------------|---------------|---------------|------------------|--------------------|--|--|
| Public School     | Grades Served | Enrollment    | Eligible for FRM | Poverty percentage | Per-pupil Allocation Determined by LEA | School Title IA Allocation (Column 4 x Column 6) |
| A                 | K-5           | 600           | 456              | 76.0%              | \$1,500                                | \$684,000  |
| G                 | K-5           | 425           | 200              | 47.1%              | \$1,101                                | \$220,200  |
| C                 | K-5           | 400           | 185              | 46.3%              | \$1,100                                | \$203,500  |
| D                 | K-5           | 450           | 190              | 42.2%              | \$1,100                                | \$209,000  |
| O                 | 6-8           | 750           | 300              | 40.0%              | \$1,100                                | \$330,000  |
| B                 | K-5           | 500           | 195              | 39.0%              | \$1,100                                | \$214,500  |
| F                 | K-5           | 400           | 150              | 37.5%              | \$1,100                                | \$165,000  |
| Q                 | 9-12          | 2,600         | 942              | 36.2%              | \$1,035                                | \$974,970  |
| I                 | K-5           | 560           | 200              | 35.7%              | \$0 (eligible, not served)             | \$0  |
| E                 | K-5           | 450           | 160              | 35.6%              | \$0 (eligible, not served)             | \$0  |
| H                 | K-5           | 600           | 206              | 34.3%              | Ineligible                             | \$0  |
| N                 | 6-8           | 800           | 260              | 32.5%              | Ineligible                             | \$0  |
| P                 | 6-8           | 840           | 250              | 29.8%              | Ineligible                             | \$0  |
| M                 | K-5           | 450           | 100              | 22.2%              | Ineligible                             | \$0  |
| L                 | K-5           | 425           | 75               | 17.6%              | Ineligible                             | \$0  |
| J                 | K-5           | 420           | 70               | 16.7%              | Ineligible                             | \$0  |
| K                 | K-5           | 395           | 65               | 16.5%              | Ineligible                             | \$0  |
| <b>LEA Totals</b> |               | <b>11,065</b> | <b>4,003</b>     | <b>36.2%</b>       |  | <b>\$3,001,170</b>                               |

The following documentation is needed to complete the Eligible Attendance Area Spreadsheet: (1) a list of all the schools, (2) the enrollment numbers from the previous fall FTE count, and (3) the poverty numbers. The poverty numbers are generally provided by the school nutrition department and may be the number of students receiving assistance from State programs like TANF, Census Data, the free and reduced lunch data or the Community Eligibility Program data. The school, grade-span, enrollment data, PreK enrollment and then the poverty numbers are entered into the spreadsheet for each school. If using the Community Eligibility option, the pull-down “YES” will need to be selected to indicate the LEA is using CEP numbers for poverty.

**Table 4. Determining Allocations on an LEA-Wide Basis**

In Table 4, the LEA chooses to allocate Title IA funds to every eligible school except schools I and E, which are the two eligible schools with the lowest poverty percentages. The LEA ensures that a higher poverty school receives a per-pupil allocation that is at least as high as the per-pupil allocations of lower poverty schools. Finally, the LEA does not allocate Title IA funds to any school with a poverty percentage below 35%.

**Table 5. Determining Allocations Within Grade Spans**

**Schools Above 75% Poverty: LEA must serve regardless of grade-span before serving any school at 75% poverty or below**

| Column 1      | Column 2      | Column 3   | Column 4          | Column 5           | Column 6                               | Column 7   |
|---------------|---------------|------------|-------------------|--------------------|--|--|
| Public School | Grades Served | Enrollment | Eligible for FRPL | Poverty percentage | Per-pupil Allocation Determined by LEA | School Title IA Allocation (Column 4 x Column 6) |
| A             | K-5           | 600        | 456               | 76.0%              | \$1,500.00                             | <b>\$684,000</b>                                 |

**Elementary Grade-Span: LEA chooses to serve four schools in rank order of poverty**

|   |     |              |              |              |                            |                    |
|---|-----|--------------|--------------|--------------|----------------------------|--------------------|
| G   | K-5 | 425          | 200          | 47.1%        | \$1,307.00                 | \$261,400          |
| C   | K-5 | 400          | 185          | 46.3%        | \$1,300.00                 | \$240,500          |
| D   | K-5 | 450          | 190          | 42.2%        | \$1,300.00                 | \$247,000          |
| B   | K-5 | 500          | 195          | 39.0%        | \$1,300.00                 | \$253,500          |
| F   | K-5 | 400          | 150          | 37.5%        | \$0 (eligible, not served) | \$0                |
| I   | K-5 | 560          | 200          | 35.7%        | \$0 (eligible, not served) | \$0                |
| E   | K-5 | 450          | 160          | 35.6%        | \$0 (eligible, not served) | \$0                |
| H   | K-5 | 600          | 206          | 34.3%        | \$0 (eligible, not served) | \$0                |
| M   | K-5 | 450          | 100          | 22.2%        | Ineligible                 | \$0                |
| L   | K-5 | 425          | 75           | 17.6%        | Ineligible                 | \$0                |
| J   | K-5 | 420          | 70           | 16.7%        | Ineligible                 | \$0                |
| K   | K-5 | 395          | 65           | 16.5%        | Ineligible                 | \$0                |
| <b>Elementary School Totals (75% and below)</b> |     | <b>5,475</b> | <b>1,796</b> | <b>32.8%</b> |                            | <b>\$1,002,400</b> |

**Middle School Grade-Span: LEA chooses to not serve any schools**

|   |     |              |            |              |                            |            |
|---|-----|--------------|------------|--------------|----------------------------|------------|
| O   | 6-8 | 750          | 300        | 40.0%        | \$0 (eligible, not served) | \$0        |
| N   | 6-8 | 800          | 260        | 32.5%        | Ineligible                 | \$0        |
| P   | 6-8 | 840          | 250        | 29.8%        | Ineligible                 | \$0        |
| <b>Middle School Totals (75% and below)</b> |     | <b>2,390</b> | <b>810</b> | <b>33.9%</b> |                            | <b>\$0</b> |

**High School Grade-Span: LEA chooses to serve its single high school**

|                   |      |       |     |       |         |                    |
|-------------------|------|-------|-----|-------|---------|--------------------|
|                   | 9-12 | 2,600 | 941 | 36.2% | \$1,397 | <b>\$1,314,577</b> |
| <b>LEA Totals</b> |      |       |     |       |         | <b>\$3,000,977</b> |

In Table 5, the LEA ensures that it allocates Title IA funds to its one school with a poverty percentage above 75%. After doing so, the LEA has funds remaining and therefore the discretion to allocate the remaining funds by grade-span, which includes the flexibility not to serve a grade-span. The LEA chooses to serve its elementary and high school grade spans. In the elementary grade-span, the LEA allocates Title IA funds in rank order of poverty to four schools. In the high school grade-span, the LEA allocates Title IA funds to its one high school. The LEA declines to allocate any Title IA funds to its middle schools.

Consistent with 34 C.F.R. 200.78(c), the LEA ensures that its school above 75% poverty receives a per-pupil allocation that is at least as high as the per-pupil allocations of any of the other schools. In addition, the LEA uses its flexibility to allocate a higher per-pupil amount to its high school, with a 37.1% poverty rate, than it allocates to the elementary schools with a poverty percentage of 75% and below. This is allowable because, when an LEA allocates Title IA funds by grade-span, rules such as 34 C.F.R. 200.78(c) apply within each grade-span, not across grade spans (34 C.F.R. 200.78(a)(3)).

**Note:** An LEA that opts to serve high schools between 50 and 75% poverty and other schools 75% poverty or below 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 school above 75% poverty. Per-pupil amounts within grade spans may also vary so long as the LEA allocates higher per-pupil amounts to schools with higher poverty rates than it allocates to schools with lower poverty rates.

### **Special 125% Rule**

The per-pupil amount of funds allocated to each eligible school attendance area or eligible school, shall be at least 125% of the per-pupil amount of funds an LEA received for that year. This doesn't apply to an LEA that only serves schools in which the percentage of such students is 35% or greater (ESSA Section 1113[c][2][A]; 34 *CFR* 200.78[b][1]-[2]). Therefore, if an LEA serves a school below the 35% poverty percentage, the following must occur:

- The LEA must calculate this per-pupil amount before it reserves funds, using the poverty measure selected by the LEA (ESSA Section 1113[a][5]; 34 *CFR* 200.78[b][1]).
- Formula: District Allocation ÷ Total District Free/Reduced Count X 1.25 = Minimum Per Pupil Amount (PPA)

For example:

- An LEA has a total Title IA allocation of \$2,500,000. The LEA wishes to serve a school with poverty percentage below 35%, which triggers the 125% rule.
- The LEA has 1,243 total public and private children from low-incomes families who reside within its boundaries.
- $\$2,500,000 \div 1,243 \times 1.25 = \$2514$
- Therefore, in this example, all schools served must receive a PPA of at least \$2,514.

**Note:** An Ed-Flex waiver can be considered for the 125% rule

## Additional Allocation Flexibilities Provided by ESEA

### Skipping and Related Exception

Section 1113(b)(1)(D) of ESEA presents an exception to the requirements with respect to allocating Title IA funds to schools in rank order of poverty. It permits an LEA to elect not to serve—i.e., “skip”—an eligible school that has a higher percentage of students from low-income families if:

- The school meets the comparability requirements in ESEA Section 1118(c);
- The school receives supplemental funds from State or local sources that it spends according to the requirements in ESEA Sections 1114 or 1115 - i.e., on programs that meet the intent and purposes of Title IA (see 34 C.F.R. 200.79(c)); and
- The supplemental funds the school spends from other sources equal or exceed the amount it would receive under Title IA.

Under 34 C.F.R 200.79(b), a program meets the intent and purposes of Title IA if the program either:

- Is implemented in a school in which the percentage of children from low-income families is at least 40%;
- 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 State academic standards that all students are expected to meet;
- Is designed to meet the educational needs of all students in the school, particularly the needs of students who are failing, or are most at risk of failing, to meet the challenging State academic standards; and
- Uses the State’s assessment system to review the effectiveness of the program;

#### **OR**

- Serves only students who are failing, or are most at risk of failing, to meet the challenging State academic standards;
- Provides supplementary services designed to meet the special educational needs of participating students to support their achievement toward meeting the State’s student academic achievement standards; and
- Uses the State’s assessment system to review the effectiveness of the program.

If an LEA skips a school under ESEA Section 1113(b)(1)(D), the LEA is still required to use Title IA funds to provide equitable services to eligible students who reside in the attendance area of the skipped school. (ESEA Section 1113(b)(2)). In implementing this provision, the LEA must include children from low-income families who reside in the attendance area of the skipped school and attend private schools in calculating the proportionate share under ESEA Section 1117(a)(4)(A), and, from the proportionate share, determine the amount of Title IA funds that are available for services for eligible private school children residing in the public school attendance area of the skipped

school. Section 1117(b)(1)(E) of ESEA requires the LEA to consult with private school officials about whether eligible private school children residing in the additional served attendance area will receive services.

There is a related exception that applies if the amount of supplemental State or local funds a school receives is less than what it would receive under Title IA. Section 1113(c)(2)(B). ESEA permits an LEA to reduce the amount of Title IA funds allocated to a Title IA school by the amount of supplemental funds from State or local sources that it spends on programs that meet the intent and purpose of Title IA.

### **Grandfather Clause**

For one additional year only, Section 1113(b)(1)(C) of ESEA authorizes an LEA to allocate Title IA funds to a school that is no longer eligible but was eligible and served in the preceding year. This provision applies to a newly ineligible school and not to a school that is eligible to be served but does not receive an allocation because the LEA allocates its Title IA funds to other eligible schools with higher poverty percentages.

### **LEA - Less than 1000 students**

An LEA with an enrollment of fewer than 1,000 students does not have to follow the requirements of Section 1113 of ESEA and 34 C.F.R. 200.78 to determine which of its schools receive Title IA funds. (ESEA Section 1113(a)(6)). An LEA may use other criteria, such as academic performance or the grade-span of its schools to determine which of its schools receive Title IA funds, or it may choose to allocate Title IA funds to all schools.

### **Desegregation Plan Waiver**

If an LEA has an existing Desegregation Plan Waiver on file with the U.S. Department of Education, the LEA is permitted to treat as eligible, and serve, any school that students attend, if the number of economically disadvantaged students enrolled in the school is at least 25% of the school's total enrollment (ESSA Section 1113[a][7]).

## **General Budgeting Requirements**

### **Budget Planning**

When planning for budgeting for all federal programs, the LEA must:

- Adhere to the LEA's approved CLIP and Comprehensive Needs Assessment (CNA);
- Coordinate funds to meet the goals and needs of the LEA and
- Account for the expense of all funds in the year in which they are allocated.

There are general federal spending provisions that apply to federal education funds, including Title IA. All costs charged to ED grants must be necessary, reasonable, and allocable for the performance or administration of the grant considering the amount of money spent and the needs of the program. This requirement comes from a set of federal regulations known as the Uniform Grant Guidance (UGG), which applies to all federal grants including ED grants.

**Reasonable:** A cost must be ordinary and should not exceed the amount that a sensible person would spend under the circumstances. The LEA or school should document that the cost is the market price (is comparable to goods and services for the geographic area) and that the agency has made the purchase within its own documented procurement procedures (2 CFR 200.404).

**Necessary:** If a cost is needed for the administration, operation, or performance of the Title IA program it must be included in the LEA's or school's plan that is based on a needs assessment. If a cost is not included in the LEA's CLIP, or a school's schoolwide, targeted assistance, or SIP then the cost is considered unnecessary (2 CFR 200.404 and 405).

**Allocable:** A cost must benefit the program in proportion to the amount paid by the program. If something is purchased with 100% of Title IA funds, the item must benefit Title IA. If an LEA purchases an item with Title IA funds, then it may only be used to benefit Title IA schools. If a school is operating a schoolwide Title IA program, all students are considered eligible for Title IA services; however, in a targeted assistance Title IA program, only those students who are deemed as being the most academically at-risk students may benefit from purchases made with Title IA funds (2 CFR 200.405).

There are guiding questions to consider when deciding if expenses are allowable.

- Is the expense aligned with at least one identified need in the CLIP and/or School Improvement Plan (SIP)?
- Is the cost reasonable to address a valid need?
- Is the cost necessary for the performance of the grant?
- Is the expense in compliance with laws, regulations, and grant terms (allocable)?
- Is there evidence to support the effectiveness of this activity?
- How will this expense be monitored for implementation and effectiveness?

In addition to being necessary, reasonable, and allocable, Title IA funds must be used only to supplement the amount of funds provided from nonfederal sources which is accomplished through the Resource Allocation Methodology Plan (RAM/P).

### **Set-Asides**

An LEA's Allocation is comprised of two categories: (1) Districtwide Activities (Set-asides) and (2) School Allocations. When completing the budget there should be no unallocated funds.

Set-Aside Page Total + School Allocations Total = Total Allocation

Set-asides are for district level activities only. These items/initiatives are budgeted first (before funds are allocated to Title IA schools). Some set-asides are required, and others are optional. Activities that are included in the set-asides must be charged to the district's facility code – for most districts this is 8010.

It is important to note that providing additional school level staff, technology, materials, and/or supplies to Title IA schools should be through the school allocation and not district set-asides. Placing school level initiatives as a set-aside could cause a school to be served out of rank order.

### **Required Set-Asides**

**Homeless:** LEAs must set aside a portion of their Title IA allocation to provide services to all homeless students using one of the four methods:

Method 1: Identify homeless student needs and fund accordingly

Method 2: Obtain a count of homeless students and multiply by the district's Title IA per-pupil allocation (PPA)

Method 3: Reserve an amount greater than or equal to the district's McKinney-Vento subgrant request

Method 4: Reserve a specific percentage of the district's poverty level or its Title IA allocation

LEAs need to explain the method used to determine the set-aside amount and show the calculation in the ConApp set-aside description.

**1% Parent and Family Engagement:** LEAs with Title IA allocations greater than \$500,000 must reserve an amount at least 1% of the Title IA allocation and distribute not less than 90% of those funds to Title IA schools for parent and family engagement activities. A school or all schools in the LEA can decide to use their share or a portion of the reservation to support a district level activity for parents.

**Neglected and Delinquent (N&D):** LEAs with N&D facilities located in their service area must reserve funds to provide services to the N&D students. The set-aside amount is provided by GaDOE in the District's Grants Award Notice (GAN).

**Private Schools (If LEA has participating private schools):** LEAs with participating private schools must create a set-aside to provide equitable services to the participating private schools.

The **TOTAL amount** of the private school proportionate share from the FY23 Title I Private School Proportionate Share Calculation Worksheet is listed for all participating private schools in the set-aside.

### **Optional Set-Asides**

**Administration:** Costs for administering Title IA programs for public and private schools.

**Consolidation of Administrative Funds:** LEAs are allowed, with GaDOE approval, to consolidate federal ESSA grant funds from multiple programs in order to pay for the costs associated with the administration of those programs [ESSA Section. 8201(b)(2) and Section. 8203].

**Audit Cost:** LEA may charge the cost of the single audit for the Title IA Program

**Indirect Cost:** The GaDOE calculates restricted indirect-cost rates for LEAs each fiscal year (July 1 to June 30) based on requirements established by ED. Restricted indirect-cost rates are posted on

GaDOE's website and are sent to LEAs. The [restricted indirect cost rates](#) are found on GaDOE's website. Refer to the Federal Programs Handbook for more information about Indirect Costs.

**Professional Learning:** The description should specifically describe any districtwide or grade span supplemental professional learning initiative, NOT an activity for a selected number of schools.

**Parent and Family Engagement Carryover:** The portion of the 1% required set-aside for parent and family engagement not expended at the end of the previous year **must** be carried over to the present fiscal year and added as a custom optional set-aside entitled Parent and Family Engagement Carryover Set-Aside.

**Additional Parent and Family Engagement:** If the LEA sets aside more than the required 1% for parent and family engagement, the additional funds should be described as a separate set-aside with an explanation of initiatives to be funded.

**Extended Learning: Summer School & Afterschool programs:** The description for these set-asides must specifically state that the set-aside is a districtwide or grade span supplemental initiative in Title IA schools, not an activity for a selected number of schools. The district must indicate that summer school activities are beyond those that are required by local boards of education and/or the State.

**Supplemental EL Language Support:** Describe the Title IA supplemental language support program that is beyond the general instructional and ESOL programs.

**Foster Care Transportation:** The Title IA Foster Care Education requirements under ESEA have no corresponding budget; however, because the requirements fall under Title IA, any proposed activities that require funding could come from Title IA.

Additional information about set-asides and how to prepare the budget may be found in the current year's Budget PPT.

## Amendments

Budget amendments can be made at any time throughout the year. LEAs may submit budget amendments for:

- Any award changes (reduction or increase) or any changes on original approved budgets that exceed 25% in any function code using the LEA ConApp approval process.
- Changes in the scope of the plan or if there are expenditures for function or object codes that are not in the approved budget.
- Changes to the budget to reflect carryover funds.

If necessary, a best practice is to submit an amendment prior to the completion report submission to ensure allowability in advance.

## Carryover of Funds

Title IA of ESEA as amended by ESSA permits LEAs to carry over not more than 15% of Title IA funds not expended within the fiscal year awarded to the next fiscal year. While the law permits LEAs to carry over funds, LEAs are encouraged to expend the fiscal year's allocation within that fiscal year. The law specifies requirements for the expenditure of carryover funds exceeding the 15% carryover limitation. When the LEA fails to expend at least 85% of the allocated funds within the fiscal year (ESEA §1127a), there are two options available for requesting a carryover waiver:

- LEAs can request a waiver from GaDOE once every three years.
  - Complete the **Title I, Part A Carryover Waiver Request Form**
- The Ed-Flex waiver request within the CLIP.

LEAs have options when determining how to spend carryover funds. They may:

- Allocate the funds to schools by increasing the per-pupil amount while maintaining rank order, basing that amount on the total number of children from low-income families in each area or school.
- Allocate the funds for district-level activities, for example, professional development. LEAs implementing this option must ensure that private schools have equitable participation, if appropriate.
- Allocate the funds back to the school that originally earned the dollars and give that school an opportunity to spend the funds. (This carryover amount is not to be included in the PPA for the current fiscal year.) The carryover amount for each school is entered on the embedded Public-School Allocation worksheet within the ConApp under the column heading School Carryover. These carryover amounts are not considered for ranking the schools since the amounts were actual unspent funds from the prior year. The LEA must ask the school for a plan/budget to spend such funds and keep documentation specifying each school's amount of unspent Title IA funds from the prior year.
- Allocate the funds back to all the schools on an equal basis and give each school an opportunity to spend the carryover funds. The LEA must ask the school for a plan/budget to spend such funds. For example, \$8,000 is available from carryover and the district has a total of two Title IA schools, so each school would receive \$4,000. The amount available for each school is indicated in the School Carryover column on the Public-School Allocation page within the ConApp. These carryover amounts are not considered for ranking the schools since the amounts were actual unspent funds from the prior year.
- Allocate the funds equally between Title IA schools based on Grade Span Grouping (varying amounts between grade spans may be awarded, but exactly the same amount within each grade span). The amount by grade span for each school is indicated in the School Carryover column on the Public-School Allocation page within the ConApp. These carryover amounts are not considered for ranking the schools since the amounts were actual unspent funds from the prior year.

The above procedures for Title IA carryover of funds do not apply for the carryover of funds for equitable services to private schools.

## Transferability of Federal Funds

Under ESEA, LEAs may transfer funds received by formula under certain programs to other programs to better address State and local needs. The ESSA amended the transferability authority by changing the programs from and to which an LEA may transfer funds and removes limits on the amount of funds that may be transferred. LEAs may transfer funds out of only the two following programs (ESEA Section 5103(a)):

- Title II, Part A: Supporting Effective Instruction
- Title IV, Part A: Student Support and Academic Enrichment Grants
- An LEA may not transfer funds it receives under any other ESEA program

LEAs may transfer funds from the two programs listed above into any of the following programs (ESEA Section 5103(b)(2)):

- Title IA: Improving Basic Programs Operated by LEAs
- Title I, Part C: Education of Migratory Children
- Title I, Part D: Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-risk
- Title II, Part A: Supporting Effective Instruction
- Title III, Part A: English Language Acquisition and Language Enhancement
- Title IV, Part A: Student Support and Academic Enrichment Grants
- Title V, Part B: Rural Low-Income Schools

For detailed information on transferability of federal funds refer the Federal Programs Handbook.

## Chart of Accounts

Local units of administration (LUAs) are required by Georgia law [O.C.G.A. 20-2-167 (b) (1)] to comply with uniform regulations established by the State Board of Education relative to the statewide uniform computerized budget and accounting system. Rule 160-5-2-.23, of the Georgia Board of Education incorporates the LUA Manual by reference. Additionally, this manual provides guidance to LUA fiscal personnel and serves as a useful training and reference source for LUA employees. The annually updated [LUA Chart of Accounts](#) and corresponding [guidance](#) can be found on GaDOE Website. Additional information for the [Title I Chart of Accounts](#) may be found under Other Resources on the Title IA web page.

For budgeting and reporting purposes, LEAs must use the LUA Chart of Accounts or have a corresponding crosswalk. Not all LUA Chart of Accounts function and object codes are available when budgeting. As a rule, parameters for use of function and object code combinations are determined by the objectives and allowable activities of a program. When reading an annual, quarterly or monthly

detailed expenditure report, coordinators can identify the fund source and intended expense by looking at the coding.

EXAMPLE: 402-1750-2213-116

- 402 (FUND: Government Funds)
- 1750 (PROGRAM: Title IA)
- 2213 (FUNCTION: Instructional Staff Training)
- 116 (OBJECT: Stipends)

## **Drawdowns**

LEAs that participate in Federal Programs with the GaDOE will draw down Federal funds on a reimbursement basis for all allowable expenditures incurred in their respective participating Federal Program(s). Additional information may be found in the Federal Programs Overarching Handbook.

## **Assurances**

Each LEA and State charter school accepting funds under Title IA must agree to meet federal and State program assurances. These assurances are included in Georgia's LEA ConApp for funding. Superintendent sign off on the consolidation application denotes agreement to each assurance. A copy of the assurance document is listed below.

In General – Each LEA shall provide assurances that the LEA:

- Participate, if selected, in the State National Assessment of Educational Progress in 4th and 8th grade reading and mathematics carried out under Section 411(b)(2) of the National Education Statistics Act of 1994;
- Inform eligible schools and parents of schoolwide program authority and the ability of such schools to consolidate funds from Federal, State, and local sources;
- Provide technical assistance and support to schoolwide and/or targeted Title IA programs;
- Work in consultation with schools as the schools develop the school's Title IA program plans pursuant to Section 1114 and 1115;
- Under Section 1115, provide an accelerated, high-quality curriculum minimizing the removal of children from the regular classroom during regular school hours for instruction provided under this part; and on an ongoing basis, review the progress of eligible children and revise the targeted assistance program under this section, if necessary, to provide additional assistance to enable such children to meet the challenging State academic standards;
- Provide services to eligible children attending private elementary and secondary schools in accordance with Section 1117, and timely and meaningful consultation with private school officials regarding such services;

- Under Section 1118, an LEA may receive funds under Title IA for any fiscal year only if the SEA involved finds that the LEA has maintained the agency's fiscal effort in accordance with Section 8521;
- Under Section 1118, the LEA may receive funds under Title IA only if State and local funds will be used in schools served under this part to provide services that, taken as a whole, are at least comparable to services in schools that are not receiving funds under Title IA;
- Ensure that all LEA required internal controls specific to LEA federal expenditures are in writing according to 2 CFR Part 200 (Allowability, Segregation of Duties, Procurement, Technical Evaluations of Competitive Proposals, Conflict of Interest, Time and Effort, Stipends, Travel);
- Ensure that the LEA maintains accounting records that are supported by source documentation and that costs are allowable under applicable laws and regulations per 2 CFR Part 200, ESEA Sections 1118;
- Develop, review, and revise an LEA homeless policy to remove barriers to the enrollment and retention of children and youth in homeless situations;
- Ensure that children in foster care needing transportation to the school of origin will promptly receive transportation in a cost-effective manner and in accordance with Section 475(4)(A) of the Social Security Act (42 U.S.C. 675(4)(A));
- Ensure that all paraprofessionals working in a program supported with funds under this part meet applicable Federal requirements;
- Ensure that all teachers working in a program supported with funds under this part meet applicable State certification and licensure requirements for all Special Education service teachers and No Waiver School Systems, including any requirements for certification obtained through alternative routes to certification or PQ as determined by the Charter Systems and Strategic Waiver School Systems;
- In the case of an LEA that chooses to use funds under this part to provide early childhood education services to low-income children below the age of compulsory school attendance, ensure that such services comply with the performance standards established under Section 641A(a) of the Head Start Act (42 U.S.C. 9836a(a)).
- Work in consultation with schools as the schools develop and implement their plans or activities under Section 1119;
- Coordinate and collaborate, to the extent feasible and necessary as determined by the LEA, with the SEA and other agencies providing services to children, youth, and families if a school requests assistance from the LEA in addressing major factors that have significantly affected student achievement at the school;
- Ensure, through incentives for voluntary transfers, the provision of professional development, recruitment programs, or other effective strategies, that low-income students and minority students are not taught at higher rates than other students by unqualified, out-of-field, or inexperienced teachers.

- Use the results of the student academic assessments required under Section 1111(b)(3), and other measures or indicators available to the agency, to review annually the progress of each school served by the agency and receiving funds under this part to determine whether all of the schools are making the progress necessary to address low academic achievement and achievement gaps;
- Ensure that the results from the academic assessments required under Section 1111(b)(3) will be provided to parents and teachers as soon as is practicably possible after the test is taken, in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand;
- Assist each school served by the agency and assisted under this part in developing or identifying examples of high-quality, effective curricula consistent with Section 1111(b)(8)(D);
- Ensure the annual assessment of English language proficiency in the four language domains of all English learners. [Section 1111 (b)(2)(G)];
- Shall notify the parents of each student attending any school receiving funds under this part that the parents may request information regarding the PQ of the student's classroom teacher(s);
- Ensure that all initiatives funded with Title IA are aligned with the District's CLIP and/or school SWP/TAP plans and that the district is employing only evidenced-based interventions and working to collect evidence of evidence-based effectiveness for all Title IA funded interventions;
- Take into account the experience of model programs for the educationally disadvantaged, and the findings of relevant effectiveness-based research indicating that services may be most effective if focused on students in the earliest grades at schools that receive funds under this part;
- Ensure that it will collaborate with the GaDOE to address participation of students with disabilities in the Georgia Alternate Assessment (GAA) and (1) review local policies, procedures, and practices to ensure these are in accordance with State GAA participation guidelines, and (2) review local GAA participation data and address any student subgroup disproportionality issues;
- Ensure that the federal funds do not replace non-federal funds (State and local) the school would otherwise receive if it were not operating a Title IA program;
- Ensure that a RAM/P, if required, has been developed that equitably distributes State and local funds to all schools in the LEA (methodology is Title IA neutral); and
- Ensure that a written equity plan is annually submitted in the District's CLIP and its effectiveness is assessed in reducing identified equity gaps impacting children who are academically at risk.

## State Commissioned Charter Schools and Title IA

### Charter Schools and Title I, Part A

Charter school laws, as authorized through the 1990s, parallel and align with the goals of ESEA. Both the SEA and charter schools focus on doing what works, supporting and expanding parental options, encouraging local control, and requiring results-oriented accountability. There are two types of charter schools in Georgia. A charter school may be a public school within an LEA in which the school is geographically located, or a public State charter school approved by the State Charter School Commission of Georgia.

### Charter Schools Within an LEA

LEA charter schools that accept Title IA funds must submit (as all schools receiving Title IA funds) a Schoolwide/Targeted Assistance plan to the LEA delineating how the funds will be used to support instruction and ensure that all students meet high academic achievement and performance standards. The LEA must approve the charter school's plan, maintain the plan, and any documentation of the planning process as well as any documentation needed for audit purposes. An LEA must provide services/resources to a charter school which qualifies for Title IA services/resources. A representative from each charter school should be included in planning discussions with the LEA to maximize the impact of federal funding.

### State Charter Schools as an LEA

State charter schools have been approved by the State Charter School's Commission of Georgia (SCSC) rather than an SEA or LEA. State charter schools are considered to be an LEA/District and must develop a CLIP and submit a ConApp, to the SEA Federal Programs Division. State charter schools receive their Title IA allocations through the State of Georgia. State charter schools/LEAs are expected to meet the same requirements and responsibilities of other traditional LEAs.

### Funding Sources

The Charter School Expansion Act requires the SEA or LEA to provide notice to the charter schools regarding the federal funds for which they may be eligible. After official notification of the existence of a charter school, the LEA or the SEA must provide the charter school with timely and meaningful information about any program for which the charter school may be eligible. Technical assistance will be provided by the LEA for charter schools within the LEA and the SEA Title IA Education Program Specialists will provide technical assistance for the State charter schools.

Specific federal programs for which charter schools may receive an allocation include:

- Title IA - Improving the Academic Achievement of the Disadvantaged
- Title II, Part A - Preparing, Training, and Recruiting High Quality Teachers and Principals
- Title III, Part A - Language Instruction for Limited English Proficient and Immigratory Students (ESOL)
- Title IV, Part A - Student Support and Academic Enrichment
- Title IV, Part B - 21st Century Community Learning Centers

- Title V, Part B - Rural Education Achievement Programs (REAP)
- ESSER Funds

## **Methods to Determine Poverty**

### **Charter Schools Within an LEA**

Because poverty is an important aspect in allocating Title IA funding, **all** charter schools must have an accurate determination for those students eligible for free or reduced-price meals (FRM). Charter schools that participate in the School Nutrition Program (SNP) will follow the guidelines described in that program to determine FRM eligibility. For charter schools within an LEA that choose not to participate in the SNP, the LEA will work with these charter schools to determine documentation needed to verify and validate poverty.

### **State Charter Schools as an LEA**

The SEA will use free or reduced-price meal data for State charters that operate school nutrition programs to derive a census poverty count for all State charter schools.

ED has provided the GaDOE guidance on calculating the Title IA allocations for those State charter schools that do not operate school food nutrition programs. As an alternative method to verify and validate poverty, the SEA may use direct certified (TANF/SNAP) data for State charters that do not operate school food nutrition programs to derive FRM data.

The SEA can proportionally predict the percentage of poverty (FRM eligible) students at the charter school not participating in a SNP program with those school districts from which the charter school pulls students. The alternative method consists of using the formula below.

To ensure that the alternative poverty data source used to derive the census poverty count is the same across all State charters, the GaDOE would first use direct certified (TANF/SNAP) poverty data to derive FRM data for those State charters that do not operate school food nutrition programs. The following data will be used to determine the poverty percentage for State charter schools not participating in school food nutrition programs:

- The number of direct certified (TANF/SNAP) students residing in the geographical area of the sending LEA(s)
- The number of FRM students residing in the geographical area of the sending LEA(s)
- The number of direct certified (TANF/SNAP) students in the State charter that does not operate a school nutrition program
- The total enrollment of the State charter school

The formula used is as follows with “x” equaling the predicted number of FRL eligible students at the Charter School.

|  |   |
|--|---|
| Number of identified Direct Cert students in served<br>District(s) | Identified Direct Cert<br>Students at Charter |
| Number of identified FRL students in served<br>District(s)         | X   |

**Example**

XXX Charter School is a charter school in southwest Georgia without a school food nutrition program. The three school districts from which XXX Charter School receives students have a total of 5156 Direct Certified students and a total of 9413 FRM students.

XXX Charter has 594 students enrolled with 198 of those students identified as Direct Certified (TANF/SNAP).

If we run the formula above:

$$\frac{5156 \text{ (TANF/Public)}}{9413 \text{ (FRL/Public)}} = \frac{198 \text{ (TANF-Charter)}}{X \text{ (Poverty \% - Charter)}}$$

“Cross multiply” to determine X (Poverty percentage). The X equals 361.4767 (361 after rounding). Since the enrollment at XXX Charter School was 594, then the predicted poverty percentage for XXX Charter School (calculated 361/594) would be 61%. After deriving the poverty percentage, the GaDOE will send the State charter school a poverty notification letter. This poverty notification letter must be attached to the Title IA Attachment Tab. The information included in this notification is used to complete the eligible attendance area worksheet and the school allocation page which is embedded in the ConApp. This information is verified through the budget approval process.

State charter schools that are virtual schools serving students from across the State, use poverty numbers from the entire State. Charter schools within an LEA would pull only from a specific school district or group of school districts and would utilize total poverty counts from those districts alone.

**Charter School Allocations**

**Charter Schools Within an LEA**

The charter schools participating under an LEA will receive their Title IA allocation from the LEA.

**State Charter Schools as an LEA**

For State charter schools, the ED(ED) calculates Title IA allocations using a list of LEAs provided by the Census Bureau, which includes poverty and population data for the LEAs and is based on census maps that are generally two years old. ED determines the eligibility of each LEA for Basic, Concentration, Targeted, and Education Finance Incentive Grants (EFIG) and calculates allocations using the number of formula children ages 5 through 17 years counted under Section 1124(c) of ESEA. Formula children consist of the census LEA poverty estimates and annually collected counts of children ages 5 through 17 years

- (1) in families below poverty level receiving Temporary Assistance to Needy Families (TANF),

- (2) living in foster homes, and
- (3) in locally operated institutions for neglected or delinquent children.

ED's registry of LEAs does not match the current list of LEAs for many states. Consequently, an SEA must adjust ED's Title IA allocations to account for, among other things, LEA boundary changes and eligible LEAs, such as charter schools, that are not included on ED's list of LEAs provided by the Census Bureau. Specific ESEA regulations (34 C.F.R. §200.70 through §200.75 and §200.100) address the basic rules that an SEA must follow in adjusting ED's determined LEA allocations.

In the case of an LEA that is not on the census list of LEAs, an SEA must determine the number of formula children and children ages 5 to 17 for each special LEA and subtract these counts from each sending LEA (i.e., the LEA in which the student who attends a special LEA resides). As census poverty data are not available for special LEAs, an SEA must derive an estimate of census poverty children for each special LEA by using an alternative poverty data source that is available for both the sending and special LEAs to determine the proportion of poverty in each LEA. In other words, an SEA does not allocate Title IA funds based on such alternative poverty sources, which would create an inequitable distribution of funds, but uses these data to derive a census poverty count for a special LEA where none otherwise exist.

The GaDOE calculates the Title IA allocation for State charter schools using direct certified data that is equated to free or reduced-price meal (FRM) data based on information provided by the LEA (State charter) that indicates the students who would have qualified for the school lunch program. This data is then equated to Census Poverty Data to derive an estimate of a census poverty count, which is then used to determine the eligibility of each LEA for Basic, Concentration, Targeted, and Education Finance Incentive Grant (EFIG) formulas of the Title IA allocation.

### **First Year and Successive Year Enrollment Expansion Allocation Formulas**

The purpose of Public Law 107-110, Section 5206, Federal Formula Allocation during First Year and for successive enrollment expansions and its accompanying regulation (34 C.F.R. Part 76, Subpart H) are to ensure that new or significantly expanding charter schools receive the full amount of federal funds to which they are entitled within five months of the opening or significant expansion. In Georgia, significant expansion or growth is defined as enrollment increasing 33% or more and/or adding a grade level.

Under the requirements of Public Law 107-110, Section 5206, and the accompanying regulations, for charter schools to trigger the protections of Public Law 107-110, Section 5206 they must:

- Provide 120 days' notice. A charter school that is newly opening or significantly expanding its enrollment must provide, in writing, to the SEA or LEA, at least 120 days' notice of the date the charter school plans to open or significantly expand. If the charter school does not provide this 120-day notice, the SEA or LEA is relieved of most of its obligation to provide the federal funds within the five-month period.
- In general, State charters will give notice to the SEA, and charter schools that are part of an LEA will give notice to the LEA. The charter school must demonstrate that it is eligible to participate in the federal formula program like other schools. The difference is that new or significantly expanding charter schools may not be denied funds simply because they do not have accurate data from a prior year, even if the allocations to traditional public schools are

based on prior-year data. This is an important provision to ensure that newly opening and significantly expanding charter schools receive the amount of federal formula funds to which they are entitled. States have great flexibility in the information that can be requested from a charter school to prove that the charter school is eligible to receive federal funds.

- Upon request, the charter school must provide the SEA or LEA with data or information that is reasonably needed to estimate the amount of funds the charter school will be eligible to receive. This information would typically include estimated **enrollment numbers and poverty data**. The State Board of Education (SBOE) also requires State charter schools to identify the county of residence of the student population to complete the award allocation process.
- Once the charter school opens or significantly expands, the school must provide actual enrollment and poverty data to the SEA or LEA (as appropriate). This allows the SEA or LEA to adjust the federal formula allocations based on actual numbers, rather than on the estimate. This data is verified through the regular FTE-1 report filed each October.

If the charter school provides 120 days' notice to the SEA or LEA, the SEA or LEA has two obligations:

- First, the SEA or LEA must provide timely and meaningful information about each federal program under which the charter school may be eligible to receive federal formula funds. Timely and meaningful is described in guidance issued by ED as information a school reasonably needs to know in order to make an informed decision about whether to participate in a particular covered program and the steps that the charter school needs to follow.
- Second, the SEA or LEA must allocate federal formula funds to the charter school based on reasonable estimates.

The following chart describes the correlation between the opening or expansion date and the obligation to allocate federal formula funds. The programs covered by Public Law 107-110, Section 5206 include all State-administered elementary and secondary education formula programs as well as all federal formula programs that they would be entitled to receive.

| Opening or Expansion Date of Charter School | Obligation to Allocate Federal Formula Funds   |
|---|--|
| On or before November 1                     | Must allocate full proportionate amount of program funds for which the charter school is eligible within five months of the opening or expansion date. |

|   |   |
|---|---|
| <b>After November 1 but before February 1</b> | Must allocate the pro rata portion of proportionate amount of program funds for which the charter school is eligible, on or before the date the SEA allocates funds to LEAs under the program for the succeeding academic year. |
| <b>After February 1</b>                       | May, but is not required to, allocate the pro rata portion of the proportionate amount of program funds for which the charter school is eligible.   |

### **Maintenance of Effort (MOE) and State Commissioned Charter Schools**

Federal program requirements require all LEAs to verify documentation and maintenance of equivalent financial expenditures of state and local funds for their students from one year to the next. The expenditures from one year to the next should not exceed a 10% difference. Each fiscal year Federal funding is contingent upon MOE being documented between the past fiscal year. If the State Commissioned Charter School was not in existence the previous year, it is impossible for this requirement to be met. In fact, the LEA will be unable to meet this requirement until it has been in existence for three consecutive years. Those State Commissioned Charter Schools will need to complete the “Charter School Maintenance of Effort (MOE)” form located on the Other Resources webpage and attach it to the Title I Attachment Tab. Once the LEA has been in existence for three consecutive years, the GaDOE portal will automatically calculate the MOE.

For additional information about Maintenance of Effort (MOE) and Comparability, refer to these sections:

#### **Resources**

- Please visit the ED Website for the *Impact of the [New Title IA Requirements on Charter Schools Non-Regulatory Guidance](#)*

### **Title IA Programs**

Title IA schools can operate either as a Schoolwide Program (SWP) or Targeted Assistance Program (TAP). Each Title IA program must develop and implement an SIP as outlined in ESEA Sections 1113 and 1114.

There is not a required format for the development of the SIP. An SIP plan, whether it is for a SWP or TAP can be developed using:

- A locally developed format;
- The template provided on the School Improvement website; **OR**
- The SLDS platform within the Portal.

The template within the portal on the SLDS platform mirrors the district level CLIP and contains all the required components of a SWP or a TAP. Using the SLDS school improvement platform also provides an electronic platform for the district staff to work with schools on development of school level plans. GaDOE will have access to plans, as well, when reviewing a budget.

A program plan checklist is provided on the Title IA website for both a SWP and a TAP. Following the program plan checklists developed for each of these programs will ensure **all** the required elements are captured in the plan. It is important to note that these plans, which outline the Title IA program implemented at the school level, will guide the development of school level budgets.

The following sections of the handbook will provide more detail for the implementation of schoolwide and targeted assistance programs.

### **Targeted Assistance Programs**

In all schools selected to receive Title IA funds under ESSA, Section 1115(b) that are ineligible for a SWP or that choose not to operate such a SWP, an LEA serving such schools may use funds received under this part for TAP that provide services to eligible children identified as having the greatest academic need.

### **Components of a Targeted Assistance Program**

Section 1115 of ESEA lists the following components of a TAP:

1. Description of the method by which children are to be identified by the school as failing, or most at risk of failing, to meet the challenging State academic standards based on multiple, educationally related, objective criteria by teachers and school leaders, in consultation with parents, administrators, paraprofessionals, and specialized instructional support personnel.
  - a. Children not older than age 21 who are entitled to a free public education through grade 12; and
  - b. Children who are not yet at a grade level at which the LEA provides a free public education.
2. A description of the supplemental programs, activities, and academic courses necessary to provide a well-rounded education. Section 1115(b)(2)(A)
3. A description of methods and instructional strategies that will be provided to strengthen the academic program of the school which may include:
  - a. Expanded learning time, before and after school programs, and summer programs and opportunities, and
  - b. A schoolwide tiered model to prevent and address behavior problems, and early intervening services, coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.). Section 1115(b)(2)(B) (i-ii)
4. Strategies planned to assist preschool children in the transition from early childhood education programs such as Head Start, the literacy program under Subpart 2 of Part B of Title II, or State-run preschool programs to elementary school programs. Section 1115 (b)(2)(C)
5. Description of provisions made to serve all eligible children, including:
  - a. Economically disadvantaged children;

- b. Children with disabilities;
  - c. Migrant children;
  - d. Children who are English learners;
  - e. Homeless children;
  - f. Children who, at any time in the 2 years preceding the year for which the determination is made, participated in a Head Start program, the literacy program under Subpart 2 of Part B of Title II, or in preschool services under Title IA; **and**
  - g. Children who reside at a State Neglected/Delinquent facility or attend a community day program. Section 1115(c)(2) (A-E)
6. Description of how the school will provide professional development with resources provided under this part, and, to the extent practicable, from other sources, to teachers, principals, other school leaders, paraprofessionals, and, if appropriate, specialized instructional support personnel, and other school personnel who work with eligible children in programs under this section or in the regular education program. Section 1115(b)(2)(D)
  7. Description of how the school will be implementing strategies to increase the involvement of parents of eligible children in accordance with Section 1116. Section 1115(b)(2)(E)
  8. Description of the process for reviewing the progress made by participating children on an ongoing basis and the process for evaluating and revising the program plan as needed to provide additional assistance to enable these children to meet the State content standards and State student performance standards. Section 1115(b)(2)(G)(iii)
  9. Description of the process performed at the school coordinating and integrating Federal, State, and local services and programs, such as programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start programs, adult education programs, career and technical education programs, and comprehensive support and improvement activities or targeted support improvement activities under Section 1111(d). Section 1115(b)(2)(D)
  10. Description of the efforts to be made to support an accelerated, high-quality curriculum and at the same time minimize the removal of children from the regular classroom during regular school hours for instruction. Section 1115(b)(2)(G)(ii)

Each targeted-assistance program should:

- Use such program's resources under this part to help participating children meet the State's challenging student academic achievement standards expected for all children.
- Ensure that planning for students served under this part is incorporated into existing school planning.

- Use effective methods and instructional strategies that are evidence-based and strengthens the core academic program of the school and that:
  - Give primary consideration to providing extended learning opportunities, such as an extended school year, before school, after school, and summer school programs.
  - Help provide an accelerated, high-quality curriculum, including applied learning.
  - Minimize removing children from the regular classroom during regular school hours for instruction provided under this part.
  - 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, Even Start, Early Reading First, or State-run preschool programs to elementary school programs.
- Provide opportunities for professional development with resources provided under this part and, to the extent practicable, from other sources for teachers, principals, and paraprofessionals, including, if appropriate, pupil services personnel, parents, and other staff who work with participating children in programs under this section or in the regular education program.
- Provide strategies, such as family literacy services, to increase family and parental engagement in accordance with ESEA Section 1116.
- Coordinate and integrate federal, State, and local services and programs, including programs supported under ESEA, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training.

Each LEA with Title IA targeted assistance programs must have the schools develop, amend, and annually update their targeted assistance plans. The Federal Programs Director should utilize the [Targeted Assistance Plan Checklist](#) to ensure all components of a targeted assistance plan are in place.

However, it should not be a plan isolated from the overall school improvement plan. The school's improvement plan may serve the purpose of the targeted assistance plan, as long as the school improvement plan addresses all the targeted assistance components required in ESSA.

These required components must be clearly identified and highlighted in the targeted assistance plan. The superintendent's signature on the ConApp assures that all requirements for developing or updating targeted assistance plans have been met.

## Eligible Students

Eligible children are students identified by the school as failing, or most at-risk of failing, to meet the GaDOE's challenging academic achievement standards. The criteria used to determine the most at risks students is defined as **multiple** (meaning more than one method), **educationally-related** (academic component), **objective criteria** (not based on teacher judgement of other subjective means).

A multiple, educationally-related, objective criteria for **each** core content area (English/language arts, reading, mathematics, science or social studies) and grade level being targeted. Point values must be assigned for each criterion and for each subject area being targeted. This should result in an objective rank order list of students by grade level/subject area to determine the priority order in which students will be served. Students in a targeted assistance program must be served in rank order. Most often, this rank-order list is completed in an Excel spreadsheet. An example [spreadsheet](#) may be found under Other Resources on the Title IA web page. The Excel spreadsheet allows the staff to quickly sort the group of students by rank order of points to identify students who are most at-risk for failure for each targeted subject area and grade level. Rank order lists prioritizing the students to be served must be up-to-date and on file in the Title IA office. The selection criteria must be clearly identified in each school's targeted assistance plan.

The standards above do not apply, however, to children from preschool through second grade. These younger students must be chosen solely on teacher judgment, interviews with parents, and other developmentally-appropriate measures. Pencil-and-paper tests are considered inappropriate for identifying young children.

Children who are economically disadvantaged, children with disabilities, migratory children, homeless children, or limited English-proficient children are eligible for services under this part on the same basis as other children selected to receive services under this part. In general, the following children are eligible for services under Title IA:

- A child who, at any time in the two years preceding the year for which the determination is made, participated in a Head Start, Even Start, or Early Reading First program, or in preschool services under Title IA.
- A child who, at any time in the two years preceding the year for which the determination is made, received services under Title I, Part C: Education of Migratory Children.
- A child in a local institution for neglected or delinquent children and youth or a child attending a community day program for such children.
- A child who is homeless and attending any school served by the LEA.

Title IA funds may not be used to test the entire student population to identify the pool of eligible students or to determine which children are failing or at-risk of failing the State standards. However, once the pool of eligible students is identified, then Title IA funds may be used in selecting Title IA participants.

Determining eligibility for services is an entirely separate and distinct process from determining a school's population of low-income children to calculate its per pupil allocation. Selection of students for services is based entirely on low achievement by identified subject area and not low income. For example, if a child of a wealthy family attends a Title IA school and has difficulty in mathematics, he or she would be eligible for Title IA services in mathematics on the same basis as any other student.

It is important to remember that funds received under this part may not be used to provide services that are otherwise required by law to be made available to eligible children described above but may be used to coordinate or supplement such services.

## Use of Funds Requirements

- Detailed programmatic and fiscal records must be maintained to document that Title IA funds are spent on activities and services for only Title IA participating students, their parents, and the teachers of the identified students.
- It is the LEA's responsibility to ensure and document that Title IA students are using equipment the majority of the time. It is the LEA's responsibility to ensure and document that Title IA students are using equipment the majority of the time. Be sure that the non-Title IA use of equipment does not interfere with the intended purpose.
- Each school conducting a program under this section will assist participating children to meet the State's proficient and advanced levels of achievement.
- Title IA paid personnel may assume limited duties that are assigned to similar personnel who are not paid with Title IA funds, including duties beyond classroom instruction or that do not benefit participating children. The amount of time spent on such duties is the same proportion of total work time as that of similar personnel at the same school.

## Simultaneous Service

Nothing will be construed to prohibit a school from serving students under this statute simultaneously with students with similar educational needs in the same educational settings where appropriate. However, this rule discourages the pullout of Title IA students from content area classes and enables Title IA students to remain in the regular classroom.

## Comprehensive Services

If health, nutrition, and other social services are not otherwise available to participating children in a targeted assistance school, the school, if appropriate, has conducted a CNA and established a collaborative partnership with local service providers, and if funds are not reasonably available from other public or private sources, then a portion of Title IA funds may be used to provide these services, including:

- The provision of basic medical equipment, such as eyeglasses and hearing aids;
- Compensation of a coordinator;
- Family support and engagement services;
- Integrated student supports; **and**
- Professional development necessary to assist teachers, specialized instructional support personnel, other staff, and parents in identifying and meeting the comprehensive needs of eligible children.

## Integration of Professional Development

To promote the integration of staff supported with funds under Targeted Assistance into the regular school program and overall school planning and improvement efforts, public school personnel who

are paid with funds received under this part may participate in general professional development and school planning activities.

## **Family Engagement in Title IA Targeted Assistance Programs**

Public schools with Title IA Targeted Assistance Programs must meet all parent and family engagement compliance requirements for families of targeted students. These requirements include hosting an Annual Title IA Meeting as well as creating, in consultation with these parents, a school parent and family engagement policy and school-parent compact. Parents of students, served by a Title IA TAP, should also be invited to participate in the revision of the school's SIP and the CLIP which includes the district-level parent and family engagement policy. Parents should also be invited to provide input into how family engagement funds are spent and to participate in meeting the requirements for building the capacity of parents and staff who directly serve students in the TAP. For more information regarding family engagement compliance requirements, visit the [GaDOE Family-School Partnership Program](#) website.

## **Schoolwide Programs**

### **Purpose of Schoolwide Programs**

The purpose of a schoolwide Title IA program is to improve the entire educational program in a school, which should result in improving the academic achievement of all students, particularly the lowest-achieving students. The goal of such a program is to assist those students to demonstrate proficiency on academic standards.

### **Title IA Schoolwide Programs to Support School Reform**

A Title IA schoolwide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title IA school. Its primary goal is to ensure that all students, particularly those who are low-achieving, demonstrate proficient and advanced levels of achievement on State academic standards. Under ESSA Section 1114(a)(1), a school may operate a schoolwide program if it meets any of the following conditions:

- A Title IA school with 40% or more of its students living in poverty, regardless of the grades it serves.
- A Title IA school that receives a waiver from GaDOE to operate a schoolwide program without meeting the 40% poverty threshold.
  - Under Section 1114(a)(1)(B) of ESSA, a school that serves an eligible school attendance area in which less than 40% of the children are from low-income families, or a school of which less than 40% of the children enrolled in the school are from such families, may operate a schoolwide program under this section if the school receives a waiver from GaDOE to do so, after taking into account how a schoolwide program will best serve the needs of the students in the school served under this part in improving academic achievement and other factors. A Schoolwide Poverty Threshold Waiver is required when the poverty rate of a Title IA school that wishes to operate as a schoolwide program falls below 40%. The waiver is also needed should a non-Title school with a poverty rate below 40% desires to become a schoolwide school.

- Waivers must be submitted annually. The LEA/school desiring a waiver for the upcoming year must apply by the established deadline listed in the Title IA Year at a Glance using the [“Application for Waiver - Schoolwide Poverty Threshold”](#) form.

A schoolwide reform strategy requires a school to:

- Conduct a comprehensive needs assessment.
- Identify and commit to specific goals and strategies that address those needs.
- Create a comprehensive plan.
- Conduct an annual evaluation of the effectiveness of the schoolwide program and revise the plan annually or as necessary.

### **Benefits of Operating a Schoolwide Program**

A school that operates a schoolwide program is able to take advantage of numerous benefits including:

- Serving all students. A school operating a schoolwide program does not need to identify particular students as eligible to participate (ESEA Section 1114(a)(2)(A)(i)).
- Providing services that need not be supplemental. A school operating a schoolwide program does not need to provide specific services that supplement the services participating students would otherwise receive (ESEA Section 1114(a)(2)(A)(ii)).

### **New Schoolwide Programs**

The LEA must submit written notification to the GaDOE that a school is preparing to become a schoolwide program. Written notification must be submitted to the assigned Title IA Education Program Specialist before the school is declared a schoolwide program. Contact information for Title IA Education Program Specialists may be found at the [Title IA Website](#). Notification may be provided through a letter submitted by the LEA and signed by the superintendent or through the [LEA intent form](#). Written notification must provide the following:

- The name of the school and school principal.
- The address of the school.
- The name of the district’s optional outside technical assistance provider unless the LEA and its school support team are utilized.
- The expected date the school will become a schoolwide program.
- An assurance that the school staff made the decision to become a schoolwide program.
- An assurance that the school staff will meet the plan development requirements in ESEA, Section 1114.

- An assurance that the LEA will provide the necessary technical assistance and support to the school.
- If the LEA deems it is not necessary for the school to develop a comprehensive plan during a full one-year period, an assurance that the school conducted appropriate planning with support from the LEA.
- An assurance that the LEA will make available the schoolwide plan when requested by the GaDOE or the Georgia Department of Audits.
- The Superintendent must sign the written notification.

When the schoolwide plan is complete, it must be submitted to the assigned Title IA Education Program Specialist for approval. The plan will be reviewed and approved if all components are met. The LEA will receive written notification that the school has official approval to become a schoolwide program.

### **Schoolwide Program Components**

There are five basic components of a schoolwide program that are essential to effective implementation:

**1. Comprehensive Needs Assessment - Section 1114(b)(1)(A)**

Is based on a comprehensive needs assessment of the entire school that takes into account information on the academic achievement of children in relation to the challenging State academic standards, particularly the needs of those children who are failing, or are at-risk of failing, to meet the challenging State academic standards and any other factors as determined by the local educational agency.

**2. Schoolwide Reform Strategies - Section 1114(b)(7)(A)(i-iii)(I-V)**

Address the reform strategies the school will implement to meet the school needs, including a description of how such strategies will:

- a. Provide opportunities for all children, including all subgroups defined in Section 1111(c)(2), to meet the State's challenging academic standards;
- b. Use methods and instructional strategies that strengthen an academic program in the school, will increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum, which may include programs, activities, and courses necessary to provide a well-rounded education;
- c. Address the needs of all children in the school, but particularly the needs of those at risk of not meeting the challenging State academic standards through activities which **may** include:
  - i. Counseling, school-based mental health programs, specialized instructional support services and other strategies to improve students' skills outside the academic subject areas;

- ii. Preparation for and awareness of opportunities for postsecondary education and the workforce, which may include career and technical education programs and broadening secondary school students' access to coursework to earn postsecondary credit while still in high school (such as Advanced Placement, International Baccalaureate, dual or concurrent enrollment, or early college high schools);
- iii. Implementation of a schoolwide tiered model to prevent and address problem behavior, and early intervening services, coordinated with similar activities and services carried out under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.);
- iv. Professional development and other activities for teachers, paraprofessionals, and other school personnel to improve instruction and use of data from academic assessments, and to recruit and retain effective teachers, particularly in high need subjects;
- v. Strategies for assisting preschool children in the transition from early childhood education programs to local elementary school programs.

**3. Evaluation of the Schoolwide Plan - 34 CFR §200.26**

- a. Address the regular monitoring and implementation of, and results achieved by, the schoolwide program, using data from the State's annual assessments and other indicators of academic achievement.
- b. Determining whether the schoolwide program has been effective in increasing the achievement of students in meeting the challenging State academic standards, particularly for those students who had been farther from achieving the standards.
- c. Describe how the Schoolwide plan will be revised, as necessary, based on regular monitoring to ensure continuous improvement of students in the schoolwide program.

**4. ESSA Requirements to Include in the Schoolwide Plan - Section 1116 (b)(1)**

Jointly develop with, and distribute to, parents and family members of participating children a written parental and family engagement involvement policy, agreed on by such parents, that shall describe the means for carrying out the requirements of Subsections (c) through (f). Parents shall be notified of the policy in an understandable and uniform format and, to the extent practicable, provided in a language the parents can understand. Such policy shall be made available to the local community and updated periodically to meet the changing needs of parents and the school.

**5. Schoolwide Plan Development - Section 1114(2)(B)(i-iv)**

- a. Is developed during a 1-year period; unless - the school is operating a schoolwide program on the day before the date of the enactment of Every Student Succeeds Act, in which case such school may continue to operate such program but shall develop

amendments to its existing plan during the first year of assistance after that date to reflect the provisions of the section.

- b. Is developed with the involvement of parents and other members of the community to be served and individuals who will carry out such plan, including teachers, principals, other school leaders, paraprofessionals present in the school, administrators (including administrators of programs described in other parts of this title), the local educational agency, to the extent feasible, tribes and tribal organizations present in the community, and, if appropriate specialized instructional support personnel, technical assistance providers, school staff, if the plan relates to a secondary school, students, and other individuals determined by the school.
- c. Remains in effect for the duration of the school's participation under this part, except that the plan and its implementation shall be regularly monitored and revised as necessary based on student needs to ensure that all students are provided opportunities to meet the challenging State academic standards.
- d. Is available to the local education agency, parents, and the public, and the information contained in such plan shall be in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand.
- e. Is developed in coordination and integration with other Federal, State and local services, resources, and programs, such as programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start programs, adult education programs, career and technical education programs, and schools implementing comprehensive support and improvement activities or targeted support and improvement activities under Section 1111(d), if appropriate and applicable.

The federal programs director should utilize the [Schoolwide Plan Checklist](#) to ensure all components of a schoolwide plan are in place. For existing Title IA Schoolwide Programs, the superintendent's signature on the ConApp assures that all requirements for developing or updating schoolwide plans have been met. The Schoolwide Plan Checklist should be kept on file annually for monitoring purposes.

### **Using Federal Funds Flexibly in a Schoolwide Program**

Consistent with the benefits identified above, a school operating a schoolwide program may use Title IA funds for any activity that supports the needs of students in the school as identified through the CNA and articulated in the schoolwide plan. Charter schools will not be required to do an additional plan to serve as a schoolwide program. The Charter school's CLIP will stand as their schoolwide program plan. In implementing the schoolwide plan, a school must, among other things, use effective methods and instructional strategies that are based on evidence, ongoing professional development, and increase parent involvement. The specifics of the schoolwide plan, including which evidence-based strategies and instructional methods will be used, are at the discretion of the school (and other LEA officials). The district's RAM/P would serve as a method of defining supplement vs. supplant compliance.

### **Examples of Uses of Funds in a Schoolwide Program**

- Increased learning time

- High-quality preschool services to facilitate the transition from early learning to elementary education programs
- Evidence-based strategies to accelerate the acquisition of content knowledge for English Learners
- Equipment, materials, and training needed to compile and analyze data to monitor progress, alert the school to struggling students, and drive decision making
- Devices and software for students to access digital learning materials and collaborate with peers, and related training for educators
- Instructional coaches to provide high-quality school-based professional development
- Evidence-based activities to prepare low-achieving students to participate successfully in advanced coursework
- School climate intervention, e.g., anti-bullying strategies, positive behavior interventions and supports
- Activities that have been shown to be effective at increasing family and community engagement in the school, including family literacy programs
- Activities that have been shown to be effective at increasing family and community engagement in the school, including family literacy programs
- Counseling, school-based mental health programs, mentoring services, and other strategies to improve students' nonacademic skills
- Two-generation approaches that consider the needs of both vulnerable children and parents, together, in the design and delivery of services and programs to support improved economic, educational, health, safety and other outcomes that address the issues of intergenerational poverty

### **Schoolwide Programs (SWP) Tools and Resources**

Many tools and resources are available on the Title IA website and at the following links:

- [Schoolwide Programs](#)
  - [Schoolwide Plan Checklist](#)
  - [Schoolwide Program Intent Form](#)
  - [Schoolwide Planning Timeline](#)
  - [Application for Poverty Threshold Waiver – Schoolwide](#)
  - [Schoolwide Poverty Threshold Waiver FAQs](#)

- [Schoolwide Guidance](#)
- [Updated Schoolwide Guidance](#)

## **Consolidation of Schoolwide Funds**

As outlined in ESEA Section 1114(a)(1)(3), which states that a school operating a schoolwide Title IA program may consolidate Federal, State, and local education funds to address the needs of students in the school. If a schoolwide school consolidates Title IA with other funds, its Title IA schoolwide plan must also list the specific State, local, and federal programs that will be consolidated in the schoolwide program. See ED 2016 Schoolwide Guidance; USDE 2016 Non-Regulatory Guidance on schoolwide programs outlines the benefits of consolidating State, local, and federal funds in schoolwide programs. For additional information for Schoolwide Consolidation of Funds refer to [Consolidation of Funds Website](#).

## **Title IA Program Activities and Required Services**

### **Parent and Family Engagement**

The [Family-School Partnership Program's](#) website provides guidance and clarification of the requirements of the parent and family engagement provisions of the Title IA, Sections 1116, 1112(e)(3)(C), and 1112(e)(4) of ESSA. The information provided will guide school and district staff, such as Title IA directors/coordinators and family engagement coordinators, through the process of developing and maintaining an effective Title I Parent and Family Engagement Program. The information provided will guide school and district staff, such as Title IA directors/coordinators and family engagement coordinators, through the process of developing and maintaining an effective Title IA Parent and Family Engagement Program.

### **Parent Notifications**

- Right to Know Parent Notification - (Section 1112(e)(1)(A)) - In Georgia, in accordance with ESSA, all LEA schools/programs are required to notify parents at the beginning of each school year of their right to know the PQ of their student's classroom teachers and paraprofessionals.
- 20-Day Notifications - (Section 1112(e)(1)(B)(ii)) - In Georgia, in accordance with ESSA, all LEA schools/programs are required to provide timely notice to parents when students have been assigned or taught for four or more consecutive weeks by a teacher who does not meet applicable State certification or licensure requirements or the professional qualifications in alignment with an approved charter or strategic waiver application at the grade level and subject area in which the teacher has been assigned. In Georgia, notification requirements apply to all teachers in all LEAs and schools/programs within each LEA. Notifications must be made within ten business days following the four consecutive weeks. The 20-Day Parent Notification is not required for paraprofessionals since ESSA In-Field reporting does not apply to paraprofessionals.
- EL Parent Notification - (Sections 1112(e)(3)(A) and 1112(e)(4)) - LEAs are required to notify, in an understandable language and format, parents of ELs who have been selected to participate in the LEA's Title III or Title IA supplemental English language services. EL Parent Notification - (Sections 1112(e)(3)(A) and 1112(e)(4)) - LEAs are required to notify, in an understandable language and format, parents of ELs who have been selected to participate in the LEA's Title III or Title IA supplemental English language services. Notifications must be

sent no later than 30 calendar days after the beginning of the school year. For newly identified ELs, notifications must be sent during the first two weeks of the EL being placed in a supplemental language program. This notice also permits the parent to waive participation in the Title-funded services.

## **Paraprofessionals**

Section 1111(g)(2)(M) of ESSA, Pub. L. No. 114-95, requires assurances that the State has professional standards for paraprofessionals working in a Title IA Program, including qualifications that were in place on the day before December 10, 2015, when ESSA was enacted. ED published Title IA Paraprofessionals Non-Regulatory Guidance in 2004, the latest guidance concerning paraprofessionals. The law also requires that State plans contain assurances that all paraprofessional working in Title IA programs meet applicable State certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification. (Section 1111(g)(2)(J)).

### **Definition**

- A paraprofessional is an individual with instructional duties who provides instructional support to students. ([ED: Title IA Paraprofessionals Non-Regulatory Guidance, March 2004](#))
- The term “paraprofessional” means an individual who is employed in a preschool, elementary school, or secondary school under the supervision of a certified or licensed teacher, including individuals employed in language instruction educational programs, special education, and migrant education. (Section 3201(11)).
- A non-instructional paraprofessional or aid is defined as:
  - An individual who works solely in a non-instructional role, such as food service, cafeteria or playground supervision, personal care services, and non-instructional computer assistance. For Title IA, purposes, they are not considered to be paraprofessionals. ([ED: Title IA Paraprofessionals Non-Regulatory Guidance, March 2004](#))

### **Allowable Activities for Paraprofessionals Working in Title IA Schools**

Paraprofessionals who work in a Title IA schoolwide program or targeted assistance program and are paid with Title IA funds may be assigned the following instructional support duties:

- One-on-one tutoring, if the tutoring is scheduled at a time when a student would not otherwise receive instruction from a teacher
- Assisting in classroom management
- Assisting in computer instruction
- Conducting parental involvement activities
- Providing instructional support in a media center

- Serving as a translator
- Providing instructional support services

A paraprofessional may only provide instructional support to a student if the paraprofessional meets State certification and licensing requirements and the qualifications required in ESSA: Section 1111(g)(2)(J) and Section 1111(g)(2)(M).

A paraprofessional may only work under the direct supervision of a qualified teacher. A paraprofessional is deemed to work under the direct supervision of a teacher if the teacher plans the instructional activities for the paraprofessional, the teacher evaluates the achievement of students with whom the paraprofessional works, and the paraprofessional works in close and frequent physical proximity to the teacher. (ED Paraprofessionals Non-Regulatory Guidance, D-1)

A paraprofessional may assume limited duties that are assigned to similar personnel who are not working in a program supported with Title IA funds, including non-instructional duties if the amount of time the paraprofessional spends on those duties is the same proportion of total work time as the time spent by similar personnel at the same school. (O.C.G.A. §20-2-204, 20-2-211.1, GaPSC Rule 505-2-.18, CPI Definitions)

### **Professional Qualifications (PQ) and ESSA In-Field Reporting**

Under the reauthorization of the Elementary and Secondary Education Act of 1965 as ESSA of 2015, Highly Qualified (HiQ) is no longer required or reported to ED. Instead, ESSA, under Title IA, says that SEAs and LEAs must ensure teachers meet applicable State certification requirements. In Georgia, under the Official Code of Georgia Annotated (O.C.G.A.), State certification requirements are established by the Georgia Professional Standards Commission (GaPSC). However, Georgia law also allows LEAs to waive certification requirements in Title 20 if the LEA has an approved Charter or Strategic Waiver Contract. LEAs that waive State certification must establish PQ for their teachers and report the requirements in their annual ESSA application - the CLIP. In Georgia, PQ requirements apply to all teachers in all LEAs.

Effective September 13, 2017, all special education teachers in Charter and Strategic Waiver Systems with an approved contract were required to meet full State certification requirements in both service and content when assigning grades. However, effective February 10, 2020, the certification requirements for Special Education teachers assigning grades in content were changed and Charter and Strategic Waiver Systems with approved contracts are now permitted to waive content certification and determine the professional qualifications for special education teachers assigning grades in alignment with the students' Individualized Education Programs (IEP).

Special Education teachers in No Waiver Systems and Charter and Strategic Waiver Systems that do not elect to waive content certification for special education teachers assigning grades in alignment with the students' IEP, must meet full State certification.

In addition, ESSA requires SEAs to report information on the qualifications of teachers including out-of-field. In Georgia, this is done at the close of each school year and is based on data submitted by LEAs (CPI, Student Class, Student Record) as cross-referenced with GaPSC certification records. In Georgia, out-of-field is determined using the GaPSC's in-field requirements as listed in the Certification/Curriculum Assignment Policies System (CAPS). If certification is waived, teachers may

meet in-field requirements using equivalent qualifications (degree, coursework, or content area assessment).

Additional information may be found on the GaDOE Federal Programs Website.

[GaDOE PQ ESSA In-Field Implementation Guide](#)

[GaDOE PQ ESSA In-Field Decision Guide](#)

[GaDOE PQ ESSA In-Field Quick Guide](#)

[GaDOE PQ ESSA In-Field Special Education Guide](#)

### **Equitable Services for Private Schools**

ESEA Section 1117 requires participating LEAs, in consultation with appropriate private school officials, to provide eligible children attending private non-profit elementary and secondary schools, their teachers, and their families with Title IA services or other benefits that are equitable to those provided to eligible public school children, their teachers, and their families. Eligible private school children are children who reside in a participating Title IA public school attendance area and who are failing, or are most at risk of failing, to meet challenging student academic achievement standards.

Under Georgia law (§20-2-690), private schools must notify LEAs within 30 days of the beginning of the school year of the enrollment of students who reside in an LEA. This is captured through the use of the [GaDOE DE1111 form](#). An LEA staff member is often responsible for maintaining this data, including the submission of the private school information to GaDOE Data Collections during the fall data collections window. An LEA staff member is often responsible for maintaining this data, including the submission of the private school information to GaDOE Data Collections during the fall data collections window.

ESEA requires that an LEA initiate the private school consultation process. The LEA must annually contact officials of private schools with children who reside in the LEA regardless of whether the private schools these students attend are located within the geographic boundaries of the LEA.

ESEA also requires an LEA to ensure that its expenditures for equitable services are equal to the proportion of funds allocated to participating public school attendance areas based on the number of children from low-income families who reside in those attendance areas and attend private schools. LEAs must determine the proportional share of Title IA funds available for equitable services based on the total amount of Title IA funds received by the LEA prior to any allowable expenditures or transfers of funds.

Additional information may be found on the [Ombudsman](#) web page.

### **Homeless Children and Youth**

Homeless children and youth must have access to the educational and other services that they need to enable them to meet the same challenging State student academic achievement standards to which all students are held. In addition, homeless students may not be separated from the mainstream school environment. Each year, Title IA programs are required to set aside funds to

meet the educational needs of homeless children and youth in the LEA. The funds may support additional tutoring services for homeless students in both Title IA and non-Title IA schools, as well as in shelters and hotels or motels where homeless families live. The funds may be used to remove barriers homeless students face to enable them to participate in educational activities, such as providing support for field trips, counseling, or school uniforms. The funds should not be used for items such as rent, utilities, or clothing for parents. Each year, the LEA's Title IA coordinator and local homeless liaison should work together to determine an appropriate amount of funds to be reserved for homeless students. Additional information may be found on the [Title IX, Part A – McKinney-Vento Education for Homeless Children and Youth](#) web page.

### **Support for Foster Care Students**

The new foster care provisions under Title IA of ESEA are intended to minimize disruptions for children in foster care by requiring the SEA and LEA to collaborate with child welfare agencies to ensure educational stability for children in foster care (ESEA Section 1111(g)(1)(E)). Additional information may be found on the [Title IA Foster Care Program](#) web page.

### **Neglected and Delinquent Students**

The purpose of Title I, Part D Neglected and Delinquent is:

- To improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging State academic content standards and challenging State student academic achievement standards that all children in the State are expected to meet;
- To provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment; **and**
- To prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education. Additional information may be found on the [Title I, Part D Neglected and Delinquent](#) web page.

### **General Compliance Requirements**

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

Under Section 8521 of ESSA, an LEA may receive funds under a covered program for any fiscal year only if the GaDOE finds that either the combined fiscal effort per student or the aggregate expenditures of the agency and the State with respect to the provision of free public education by the agency for the preceding fiscal year was not less than 90% of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year. For further guidelines, refer to MOE section of the Federal Programs Handbook.

#### **MOE - Charter School in Existence Less than Three Consecutive Years**

Under Section 8521 of ESSA, a State charter school/LEA may receive funds under a covered program for any fiscal year only if the GaDOE finds that either the combined fiscal effort per student or the aggregate expenditures of the agency and the State with respect to the provision of free public

education by the agency for the preceding fiscal year was not less than 90% of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year.

**Example:** The current FY23 Federal funding is contingent upon maintenance of effort (MOE) being documented between FY20 and FY21. If a State charter school/LEA was not in existence prior to FY20, it is impossible for this requirement to be met. In fact, the State charter school/LEA will be unable to meet this requirement until it has been in existence three consecutive years.

State charter schools in existence less than three consecutive years should complete the State Charter School Maintenance of Effort (MOE) Waiver Title IA Program form located on the Other Resources link on the Title IA web page. The State Charter School (MOE) form should be emailed to the GaDOE Title IA, Senior Program Manager for approval. Once the MOE Waiver has been approved, the State charter school/LEA should upload the form on the Title IA attachments tab in the Consolidation Application platform.

### **Resource Allocation Methodology/Plan (RAM/P)**

The ESSA includes significant changes to supplement not supplant (SNS) requirements for Title IA. GaDOE is coordinating with its LEAs to meet the requirements of the statute in Section 1118 of ESSA through the implementation of the RAM/P.

An LEA need not have RAM/P to comply with ESEA section 1118(b)(2) if it has

- One school;
- Only Title I schools; or
- A grade span that contains only:
  - A single school;
  - Non-Title I schools; or
  - Only Title I schools

ED has also issued additional [Non-Regulatory Guidance on Title IA's SNS in June of 2019](#), which is incorporated in the Federal Programs Handbook.

For further guidelines, refer to Supplement Not Supplant section of the Federal Programs Handbook.

### **Comparability of Services**

To ensure that funds made available under Title IA of ESEA are used to provide services that are in addition to the regular services normally provided by an LEA for participating children, the LEA must provide services in its Title IA schools with State and local funds that are at least comparable to services provided in its non-Title IA schools. This requirement is critical to the success of Title IA because it ensures that the federal investment has an impact on the at-risk students the program is designed to serve—something that would not occur if federal dollars replaced State and local resources that would otherwise be made available to these at-risk students. At the school building level, comparability requires an LEA to ensure that each Title IA school receives its fair share of resources from State and local funds. In other words, an LEA may not discriminate (either intentionally or unintentionally) against its Title IA schools when distributing resources funded from State and local sources simply because these schools receive federal funds.

The GaDOE requires each school district to demonstrate comparability on an annual basis. GaDOE has developed and utilizes a computerized application to calculate comparability for all school districts in the State. This application is designed to run every possible permutation available to demonstrate

comparability. The application is housed in the My GaDOE portal and automatically incorporates current FTE, CPI, and poverty data collected by the GaDOE in the Fall of each school year. If a district proves to not be comparable in the initial run of the baseline data supplied via State supplied data, the district has the opportunity to work with their Title IA Program Specialist to adjust the current data to correct data entries found to be inaccurate. Once documentation is provided to support the requested changes, the data entries can be adjusted in the “self-reported” section of the application by the designated Education Program Specialist and the comparability calculations re-run. This process is repeated until comparability is met. If comparability is still not met, the District will either utilize their Resource Allocation Methodology/Plan to demonstrate all of their schools were equitably funded with State and local funding in order to demonstrate comparability or return the requisite amount of non-federal funds to compensate for the number of instructional staff missing to meet compliance with comparability.

## **Requirement**

Section 1118(c)(1)(A) of ESEA provides that an LEA may receive Title IA funds only if it uses State and local funds to provide services in Title IA schools that are at least comparable to the services provided in schools that are not receiving Title IA funds. If the LEA serves all schools with Title IA funds, the LEA must use State and local funds to provide services that are substantially comparable in each Title IA school.

The comparability requirement does not apply to an LEA that has only one building for each grade span. A variation of this situation would be where an LEA has only two schools, one of which is a large school, and the other is a small school. In this case, the comparability requirement would not apply because the LEA would compare the small school to itself and the large school to itself. The large school would need to be twice the size of the smaller school plus one to qualify for the large vs. small exemption. An LEA may also exclude schools with 100 or fewer students from its comparability determinations.

Demonstrating comparability is a prerequisite for receiving Title IA funds. Because Title IA allocations are made annually; comparability is an **annual** requirement.

## **Criteria for Meeting Comparability**

There are several ways that an LEA may meet the comparability requirement. GaDOE has established the student/instructional staff ratio as the method for LEAs to use to determine comparability. Should an LEA experience an unusual circumstance that would indicate the need to use another method to determine comparability, the LEA must submit a request in writing to the Title IA Education Program Specialist serving the LEA. The number of students in a school is defined as the total enrollment in the school minus the pre-kindergarten enrollment in the school. When using student/instructional staff ratios to compare the average number of students per instructional staff in each Title IA school with the average number of students per instructional staff in non-Title IA schools, an LEA may consider a Title IA school comparable if its average does not exceed 115% of the average of non-Title IA schools. The LEA may choose to compare large Title IA schools in a particular grade span to large non-Title IA schools in that grade span. and small Title IA schools in that grade span to small non-Title IA schools in that grade span. The LEA may also compare high-poverty Title IA schools to low-poverty Title IA schools.

Alternately, if all schools in the LEA are Title IA schools, the LEA may compute the average student/instructional staff ratio for all its schools and consider a school comparable if the student/instructional staff ratio falls within 85 to 115% of the average for all schools. If all schools are

not comparable using the method above, the LEA may break the schools down by grade span to determine comparability. If the student/instructional staff ratio for each school in the grade span falls within 85 to 115% of the average for all schools within the grade span, the schools would be considered comparable. An LEA is also permitted to compare large Title IA to large non-Title IA schools and small Title IA to small non-Title IA schools within a particular grade span.

Furthermore, an LEA may divide its schools by poverty rate and compare the student/ instructional ratio of its high-poverty Title IA schools to the average ratio of all high-poverty schools and the student/instructional staff ratio of each low-poverty school to the average ratio of all the low-poverty schools. High poverty is clearly set as those schools at or above 60% poverty.

- High/Low Poverty - This number is set and does not vary.
  - High poverty equals 60% and above
  - Low Poverty equals 59.9% and below

An LEA does not need to include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services.

### **Developing Procedures for Compliance**

Due to the requirement that an LEA must develop procedures for complying with the comparability requirements [Section 1120A(c)(3)], a district must ensure that these procedures are in writing and, should, at a minimum:

- Include a timeline for demonstrating comparability
- Include the identification of the office responsible for making comparability calculations
- Include the measure and process used to determine whether schools are comparable and
- Include how and when the district made adjustments in schools that are not comparable

An LEA may determine comparability of each of its Title IA schools on a districtwide basis or a grade-span basis. The comparability requirement does not apply to an LEA that has only one school at each grade span. An LEA may also exclude schools that have 100 or fewer students.

There is a limitation on the number of grade spans an LEA may use when determining comparability. The online comparability application has grade spans of primary, elementary, middle, and high schools.

### **Comparability Timeline**

An LEA must be comparable by July 1 of each fiscal year. However, in Georgia LEAs have until December 31 to make any adjustments to the online comparability application.

### **January - April**

- Proactively engage in district level budget (State and local funds) discussions concerning staff assignments, equipment, and material for the purpose of ensuring compliance with Title IA comparability requirements

**May - July**

- Conduct an introductory meeting with Human Resources and LEA Finance representative to discuss the requirements for the completion of the upcoming Comparability Report
- Establish participant roles and responsibilities
- Establish LEA specific timelines for completion of the Report

**August**

- Obtain copy of preliminary district-wide school staffing report from Human resources
- Compare list of Title IA funded staff as reflected on the School Allocation page to the Title IA funded staff as reported by Human Resources
- Share accurate Title IA funded staff list with district staff responsible for the Certified/Classified Personnel Information (CPI) report to ensure accurate data is entered in the report

**September**

- It is a recommendation and best practice to gather the data needed to complete calculations (student and staff assignments data) and run a preliminary report
- Run comparability using [Comparability Worksheets](#) found on the Title IA website, under Other Resources
- Make comparability corrections immediately for all schools that are shown to be non-comparable

**October**

- An LEA should collect the necessary data to demonstrate comparability as of the October full-time equivalent (FTE) count day

**December**

- Title IA Comparability Report is submitted annually via the online comparability application in the ConApp
- LEA will be notified by GaDOE when the online comparability portal site is available for submission
- Do not submit Comparability Report until notification from Title IA Education Program Specialist

**December - January**

- If all schools in an LEA are not comparable as of the October FTE count day, the LEA will file a revised comparability report with GADOE demonstrating that, as of a date determined by GaDOE, comparability has been met.

If the LEA does not achieve comparability by a date determined by GaDOE, the LEA is in violation of Title IA comparability requirements and may be subject to withholding or repayment of the funds in the amount or percentage by which the LEA has failed to comply.

## Instructional Staff Members to be Included

When an LEA measures compliance by comparing student/staff ratios, the LEA should consistently include the same categories of staff members in the ratios for both Title IA and non-Title IA schools. Instructional staff may include teachers and other personnel assigned to schools who provide direct instructional services, including music, art, and physical education teachers; guidance counselors; speech therapists; and media specialists as well as other personnel who provide services that support instruction, such as school social workers and psychologists. In calculating comparability, an LEA should only include staff paid with State and local funds. This would exclude staff paid with private or federal funds. Other staff that would be excluded are principals, assistant principals, custodians, cafeteria personnel, school nurses, security personnel, pre-kindergarten teachers, pre-kindergarten paraprofessionals, secretaries, and non-instructional paraprofessionals.

The activities authorized by ESEA include activities that are authorized by Title VII of ESEA, the Impact Aid Program. Because Impact Aid is considered general aid to recipient LEAs, Impact Aid funds may be used for any educational activity consistent with local and State requirements. As such, Impact Aid funds are effectively deemed State and local funds for which no accountability to the federal government is required, and staff that is paid with Impact Aid funds is included in comparability determination.

## Grouping of Schools for Comparability Comparison

### Grouping by LEA Organization

The listing of school attendance areas and grade-span groups must coincide with the listing of schools or attendance areas in the Title IA section of the ConApp. **Pre-kindergarten should be excluded in the listing.** All pairing and clustering of attendance areas and schools must be the same. Use the following rules in grouping schools or attendance areas.

- Rule One: A school or attendance area serving grades in two or three of the grade-span groupings is to be included in that group with which it has the greatest number of grades in common.
- Rule Two: A school or attendance area that serves an equal number of grades in two or more grade-span groupings is to be included in the lower grade-span grouping.
- Rule Three: Generally, no more than four grade spans are to be used for comparability reporting.

The following example illustrates the application of the rules for grouping schools or attendance areas of an LEA that has its organization by grade spans K to 5, 6 to 8, and 9 to 12, but in which the grade span varies slightly in some schools.

| LEA Grade-Span Grouping | Elementary K-5 | Middle 6-8 | High 9-12  |
|-------------------------|----------------|------------|------------|
| School A: K to 8        | K,1,2,3,4,5    | 6,7,8      |            |
| School B: K to 7        | K,1,2,3,4,5    | 6,7        |            |
| School C: 9 to 12       |                |            | 9,10,11,12 |

|                     |             |     |            |
|---------------------|-------------|-----|------------|
| School D: 4 to 7    | 4,5         | 6,7 |            |
| School E: 7 to 12   |             | 7,8 | 9,10,11,12 |
| School F: 5 to 7    | 5           | 6,7 |            |
| School G: K to 6    | K,1,2,3,4,5 | 6   |            |
| School H: 6         |             | 6   |            |
| School I: K; 7 to 8 | K           | 7,8 |            |

By applying rule one, schools A, B, and G are in the elementary group; schools F, H, and I are in the middle group; and schools C and E are in the high school group. By applying rule two, school D is placed in the elementary group.

### Grouping by Size of Enrollment

Enrollment is defined as the total enrollment in the school minus the pre-kindergarten enrollment in the school.

If, in a particular grade span, the largest school has an enrollment that is **two times the enrollment** of the smallest school, the LEA may divide the schools in that grade span into two groups: one for the schools with the larger enrollments and one for the schools with the smaller enrollments. (For example, an LEA has elementary schools with enrollments of 125, 210, 320, 350, 400, and 435. The school with an enrollment of 435 is at least twice the size of the smallest school with an enrollment of 125.)

Therefore, a division into two groups within the same grade span may be made. After ranking based on enrollment, a division may be made by the LEA at any place creating the two groups. Once the sized groups are established, the schools or attendance areas are ranked according to the percentage of low-income students, and comparability is determined by comparing each high-poverty school in each group to the average of the low-poverty schools in the same group. (For example, the high-poverty large schools would be compared to the average of the low-poverty large schools.)

An LEA may not use this procedure to divide schools into two groups if such division would have the effect of exempting any school from compliance with comparability requirements.

### Elementary Grouping (K-5)

#### STEP 1

| School or Attendance Area | Enrollment | Percentage of Low-Income |
|---------------------------|------------|--------------------------|
| A                         | 210        | 63.87                    |
| B                         | 400        | 60.24                    |
| C                         | 350        | 40.35                    |
| D                         | 125        | 39.82                    |
| E                         | 320        | 35.53                    |
| F                         | 435        | 28.76                    |

### Re-Rank by Enrollment

#### STEP 2

| School or Attendance Area | Enrollment | Percentage of Low-Income |
|---------------------------|------------|--------------------------|
| D                         | 125        | 39.82                    |
| A                         | 210        | 63.87                    |
| E                         | 320        | 35.53                    |
| C                         | 350        | 40.35                    |
| B                         | 400        | 60.25                    |
| F                         | 435        | 28.76                    |

In this example, there are three possibilities for grouping. A division may be made between A and E, E and C, or C and B. For illustrative purposes, the group division will be made between A and E. Once the decision is made, each group will be re-ranked by % of **low-income small group would be:**

| School or Attendance Area | Enrollment | Percentage of Low-Income |
|---------------------------|------------|--------------------------|
| A                         | 210        | 63.8                     |
| D                         | 125        | 39.8                     |

The large group would be:

| School or Attendance Area | Enrollment | Percentage of Low-Income |
|---------------------------|------------|--------------------------|
| B                         | 400        | 60.24                    |
| C                         | 350        | 40.35                    |
| E                         | 320        | 35.53                    |
| F                         | 435        | 28.76                    |

Comparability of services would be determined for each group according to applicable procedures.

### Grouping When All Schools Receive Services

If an LEA has more than one school or attendance area within the same grade-span grouping or size and all are receiving Title IA-funded services, comparability with these schools must be demonstrated. LEAs may compare schools or attendance areas having high concentrations of children from low-income families (high-poverty schools) to the average of schools or attendance areas having low concentrations of children from low-income families (low-poverty schools). An LEA may use up to 50% of the schools or attendance areas in the group having low concentrations of children from low-income families to generate the low-poverty average that will be used for comparison with the high-poverty schools. For example: An LEA has five Title IA schools or attendance areas within the same grade-span grouping and the percentage of children are as follows:

| School or Attendance Area | Percentage of Low-Income |
|---------------------------|--------------------------|
| A                         | 63.87                    |
| B                         | 61.24                    |
| C                         | 59.71                    |
| D                         | 59.22                    |
| E                         | 57.65                    |

Schools or attendance areas A, B and C would be compared to the average of schools or attendance areas D and E; schools or attendance areas A, B, C and D may be compared to school or attendance area E.

Comparability Platform will run all calculations listed below, but only the methods where at least one school is comparable are shown in the Calculation Results Report. Districts are encouraged to check the Calculations Results Report to see which method has the most success with reaching comparability. Examples of these methods are listed below.

**Examples of Ways the Consolidated Application Platform Checks for Compliance with the Comparability Requirement**

- Example 1 - the LEA compares each Title IA school with the average of its non-Title IA schools.
- Example 2 - shows how an LEA could demonstrate comparability based on a comparison of large schools and small schools.
- Example 3 - in which all schools are Title IA schools, bases the comparisons on grade spans.
- Example 4 - all the schools in the LEA are Title IA schools, and the LEA makes separate comparisons for its large schools and small schools.
- Example 5 - in which all schools are Title IA schools, the LEA divides its schools between high-poverty and low-poverty schools and compares schools within each poverty band to each other.
- Example 6 - all the schools are Title IA schools, and the LEA establishes a limited comparison group consisting of its lowest-poverty schools and compares all its other schools to the average calculated for the comparison group.

**EXAMPLE 1** (Title IA and non-Title IA elementary schools are compared.)

In the following example, an LEA provides Title IA services to seven of its eleven elementary schools. (The district serves only elementary schools.) The LEA demonstrates comparability by annually comparing student/instructional staff ratios for each of its Title IA schools to the average student/instructional staff ratios for its non-Title IA schools. In this example, each of the Title IA schools is comparable because the student/instructional staff ratio does not exceed 14.1 (the ratio for all non-Title IA schools).

| School                             | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Comparable |
|------------------------------------|------------|--------------------|-------------------------|------------------------------------|------------|
| <b>Title IA Elementary Schools</b> |            |                    |                         |                                    |            |
| A                                  | K-5        | 528                | 70.2                    | 7.5                                | Yes        |
| B                                  | K-5        | 510                | 49.4                    | 10.3                               | Yes        |
| C                                  | K-5        | 417                | 38.7                    | 10.8                               | Yes        |
| D                                  | K-5        | 726                | 59.0                    | 12.3                               | Yes        |
| E                                  | K-5        | 189                | 16.0                    | 11.8                               | Yes        |
| F                                  | K-5        | 808                | 58.0                    | 13.9                               | Yes        |
| G                                  | K-5        | 673                | 60.0                    | 11.2                               | Yes        |

| <b>Non-Title IA Elementary Schools</b>               |     |       |       |      |  |
|--|-----|-------|-------|------|--|
| H  | K-5 | 1,764 | 114.5 | 15.4 |  |
| I  | K-5 | 757   | 70.0  | 10.8 |  |
| J  | K-5 | 1,005 | 88.0  | 11.4 |  |
| K  | K-5 | 484   | 42.0  | 11.5 |  |
| Total  |     | 4,010 | 314.5 | 12.8 |  |
| 115% of Student/FTE ratio for non-Title IA, schools* |     |       |       | 14.7 |  |

\*To be comparable, the student/instructional staff ratio for each Title IA elementary school may not exceed 14.7 (12.8 x 1.1)

**EXAMPLE 2** (Large and small Title IA and non-Title IA elementary schools are compared.)

In this example, an LEA serves 12 of its 21 elementary schools (only elementary schools are served). In addition to comparing the student/instructional staff ratios for Title IA and non-Title IA schools, the LEA further divides its elementary schools between large (with 450 or more students) and small (with fewer than 450 students) to demonstrate comparability.

| School  | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Comparable |
|---|------------|--------------------|-------------------------|------------------------------------|------------|
| <b>Large Title IA Elementary Schools</b>            |            |                    |                         |                                    |            |
| A   | K-6        | 483                | 34.4                    | 14.0                               | Yes        |
| B   | K-6        | 456                | 40.7                    | 11.2                               | Yes        |
| C   | K-6        | 582                | 43.1                    | 13.5                               | Yes        |
| D   | K-6        | 634                | 48.5                    | 13.1                               | Yes        |
| E   | K-6        | 564                | 41.1                    | 13.7                               | Yes        |
| F   | K-6        | 577                | 42.7                    | 13.5                               | Yes        |
| G   | K-6        | 691                | 56.6                    | 12.2                               | Yes        |
| H   | K-6        | 620                | 45.7                    | 13.6                               | Yes        |
| <b>Large Non-Title IA Elementary Schools</b>        |            |                    |                         |                                    |            |
| I   | K-6        | 775                | 54.6                    | 14.2                               |            |
| J   | K-6        | 509                | 41.3                    | 12.3                               |            |
| K   | K-6        | 544                | 39.3                    | 13.8                               |            |
| L   | K-6        | 899                | 65.4                    | 13.7                               |            |
| M   | K-6        | 608                | 49.4                    | 12.3                               |            |
| Total   |            | 3,335              | 250.0                   | 13.3                               |            |
| 115% of Student/FTE ratio for non-Title IA schools* |            |                    |                         | 15.3                               |            |

\*To be comparable, the student/instructional staff ratio for each large Title IA elementary school may not exceed 15.3 (13.3 x 1.15)

| School  | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Comparable |
|---|------------|--------------------|-------------------------|------------------------------------|------------|
| <b>Small Title IA Elementary Schools</b>            |            |                    |                         |                                    |            |
| N   | K-6        | 417                | 36.7                    | 11.4                               | Yes        |
| O   | K-6        | 425                | 32.6                    | 13.0                               | Yes        |
| P   | K-6        | 436                | 34.3                    | 12.7                               | Yes        |
| Q   | K-6        | 307                | 27.8                    | 11.0                               | Yes        |
| <b>Small Non-Title IA Elementary Schools</b>        |            |                    |                         |                                    |            |
| R   | K-6        | 346                | 26.4                    | 13.1                               |            |
| S   | K-6        | 325                | 27.7                    | 11.7                               |            |
| T   | K-6        | 359                | 29.8                    | 12.0                               |            |
| U   | K-6        | 297                | 27.3                    | 10.9                               |            |
| Total   |            | 1,327              | 111.2                   | 11.9                               |            |
| 115% of Student/FTE ratio for non-Title IA schools* |            |                    |                         | 13.7                               |            |

\*To be comparable, the student/instructional staff ratio for each small Title IA elementary school may not exceed 13.7(11.9 x 1.15)

**EXAMPLE 3** (All schools in district are Title IA schools, and different grade spans are compared.)

In the following example, all the schools in the district are Title IA schools. To demonstrate comparability, the LEA computes the average student/instructional staff ratio for all nine schools and determines whether the student/instructional staff ratio for each school falls within a range of 85 to 115% of the average for all schools. In its first comparability calculation, the LEA compares all schools. Because two schools are not comparable using this first comparison, the LEA then breaks the schools down by grade span to determine comparability. Based on the second method of comparison, the student/instructional staff ratio for each school in the grade span falls within 85 to 115% of the average for all schools within the grade span and is, therefore, comparable.

| School                                     | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Comparable |
|--|------------|--------------------|-------------------------|------------------------------------|------------|
| <b>School District as a Whole</b>          |            |                    |                         |                                    |            |
| A Elementary                               | K-5        | 371                | 25.6                    | 14.5                               | Yes        |
| B Elementary                               | K-5        | 483                | 33.2                    | 14.5                               | Yes        |
| C Middle School                            | 6-8        | 818                | 50.0                    | 16.4                               | Yes        |
| D Elementary                               | K-5        | 484                | 31.0                    | 15.6                               | Yes        |
| E Elementary                               | K-5        | 682                | 42.4                    | 16.1                               | Yes        |
| F Middle School                            | 6-8        | 1,174              | 62.0                    | 18.9                               | No         |
| G Elementary                               | K-5        | 423                | 32.0                    | 13.2                               | No         |
| H Elementary                               | K-5        | 482                | 29.8                    | 16.2                               | Yes        |
| ABC High School                            | 9-12       | 1,737              | 110.0                   | 15.8                               | Yes        |
| Total                                      |            | 6,654              | 416.0                   | 16.0                               |            |
| 85% of student/instructional staff ratio*  |            |                    |                         | 13.6                               |            |
| 115% of student/instructional staff ratio* |            |                    |                         | 18.4                               |            |

\*Each school is comparable if the student/instructional staff ratio falls within 13.6 (16.0 x 0.85) to 18.4(16.0 x 1.15)

| School                                     | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Comparable |
|--|------------|--------------------|-------------------------|------------------------------------|------------|
| <b>Elementary Schools</b>                  |            |                    |                         |                                    |            |
| A  | K-5        | 371                | 25.6                    | 14.5                               | Yes        |
| B  | K-5        | 483                | 33.2                    | 14.5                               | Yes        |
| D  | K-5        | 484                | 31.0                    | 15.6                               | Yes        |
| E  | K-5        | 682                | 42.4                    | 16.1                               | Yes        |
| G  | K-5        | 423                | 32.0                    | 13.2                               | Yes        |
| H  | K-5        | 482                | 29.8                    | 16.2                               | Yes        |
| Total                                      |            | 2,925              | 194.0                   | 15.1                               |            |
| 85% of student/instructional staff ratio*  |            |                    |                         | 12.8                               |            |
| 115% of student/instructional staff ratio* |            |                    |                         | 17.4                               |            |

\*Each elementary school is comparable if the student/instructional staff ratio falls within 12.8 (15.1 x 0.85) to 17.4 (15.1 x 1.15)

**EXAMPLE 3** (continued)

| School                                     | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Comparable |
|--|------------|--------------------|-------------------------|------------------------------------|------------|
| <b>Middle Schools</b>                      |            |                    |                         |                                    |            |
| C  | 6-8        | 818                | 50.0                    | 16.4                               | Yes        |
| F  | 6-8        | 1,174              | 62.0                    | 18.9                               | Yes        |
| Total                                      |            | 1,992              | 112.0                   | 17.5                               |            |
| 85% of student/instructional staff ratio*  |            |                    |                         | 14.9                               |            |
| 115% of student/instructional staff ratio* |            |                    |                         | 20.1                               |            |

\*Middle schools are comparable if the student/instructional staff ratio for each school falls within 14.9 (17.5 x 0.85) to 20.1 (17.5 x 1.15)

**Note:** There is only one high school in the district, therefore the LEA does not need to determine comparability for that school.

**EXAMPLE 4** (All elementary schools in the LEA are Title IA schools, and large and small schools are compared.)

In this example, all elementary schools in the LEA are Title IA schools and the comparability determination is based on student/instructional staff ratios. Again, because all the schools are Title IA schools, the district demonstrates comparability by determining whether the student/instructional staff ratio for each school falls within a range that is between 85 and 115% of the average for all schools. In the first set of calculations, which is based on all schools, two schools are not comparable. The LEA uses the option of small vs. large school calculation (small schools are one less than ½ the enrollment of largest school;  $641 \div 2 = 320.5 - 1 = 319.5$ ) to try and become comparable. When the LEA refines the comparison to compare small schools (those with less than 319.5 students) with each other and large schools (320.5 or more students), the student/instructional staff ratio for each school falls within 85 and 115% of the ratio for all the of schools in the category and each school is, therefore, comparable.

| School                                     | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Comparable |
|--|------------|--------------------|-------------------------|------------------------------------|------------|
| <b>All Elementary Schools</b>              |            |                    |                         |                                    |            |
| A  | K-5        | 430                | 29.3                    | 14.7                               | Yes        |
| B  | K-5        | 625                | 43.0                    | 14.5                               | Yes        |
| C  | K-5        | 300                | 24.0                    | 12.5                               | No         |
| D  | K-5        | 470                | 29.0                    | 16.2                               | Yes        |
| E  | K-5        | 641                | 45.0                    | 14.2                               | Yes        |
| F  | K-5        | 390                | 22.0                    | 17.7                               | Yes        |
| G  | K-5        | 390                | 26.0                    | 15.0                               | Yes        |
| H  | K-5        | 601                | 36.0                    | 16.7                               | Yes        |
| I  | K-5        | 420                | 26.0                    | 16.2                               | Yes        |
| J  | K-5        | 477                | 28.5                    | 16.7                               | Yes        |
| K  | K-5        | 339                | 20.0                    | 17.0                               | Yes        |
| L  | K-5        | 245                | 20.0                    | 12.3                               | No         |
| M  | K-5        | 503                | 31.5                    | 16.0                               | Yes        |
| Total                                      |            | 5,831              | 380.3                   | 15.3                               |            |
| 85% of student/instructional staff ratio*  |            |                    |                         | 13.0                               |            |
| 115% of student/instructional staff ratio* |            |                    |                         | 17.6                               |            |

\*The elementary schools would be comparable if the student/instructional staff ratio falls within 13.0(15.3 x 0.85) to 17.6(15.3 x 1.15)

| School  | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Comparable |
|---|------------|--------------------|-------------------------|------------------------------------|------------|
| <b>Large Elementary Schools (320.5 or more)</b> |            |                    |                         |                                    |            |
| A   | K-5        | 430                | 29.3                    | 14.7                               | Yes        |
| B   | K-5        | 625                | 43.0                    | 14.5                               | Yes        |
| D   | K-5        | 470                | 29.0                    | 16.2                               | Yes        |
| E   | K-5        | 641                | 45.0                    | 14.2                               | Yes        |
| F   | K-5        | 390                | 22.0                    | 17.7                               | Yes        |
| G   | K-5        | 390                | 26.0                    | 15.0                               | Yes        |
| H   | K-5        | 601                | 36.0                    | 16.7                               | Yes        |
| I   | K-5        | 420                | 26.0                    | 16.2                               | Yes        |
| J   | K-5        | 477                | 28.5                    | 16.7                               | Yes        |
| K   | K-5        | 339                | 20.0                    | 17.0                               | Yes        |
| M   | K-5        | 503                | 31.5                    | 16.0                               | Yes        |
| Total   |            | 5,286              | 336.3                   | 15.7                               |            |
| 85% of student/instructional staff ratio*       |            |                    |                         | 13.3                               |            |
| 115% of student/instructional staff ratio*      |            |                    |                         | 18.1                               |            |

\*The large elementary schools would be comparable if the student/staff instructional staff falls within 13.3(15.7 x 0.85) to 18.1(15.7 x 1.15).

| School   | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Comparable |
|--|------------|--------------------|-------------------------|------------------------------------|------------|
| <b>Small Elementary Schools (319.5 or smaller)</b> |            |                    |                         |                                    |            |
| C  | K-5        | 300                | 24                      | 12.5                               | Yes        |
| L  | K-5        | 245                | 20                      | 12.3                               | Yes        |
| Total  |            | 545                | 44                      | 12.4                               |            |
| 85% of student/instructional staff ratio*          |            |                    |                         | 10.5                               |            |
| 115% of student/instructional staff ratio*         |            |                    |                         | 14.3                               |            |

\*The small elementary schools would be comparable if the student/instructional staff ratio falls within 10.5 (12.4 x 0.85) to 14.3 (12.4 x 1.15)

**EXAMPLE 5** (High-poverty compared to high-poverty schools and low-poverty compared to low-poverty schools)

All elementary schools in the LEA are Title IA schools; the district runs comparability as district-wide comparison. One school is not comparable.

| School             | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Comparable |
|--------------------|------------|--------------------|-------------------------|------------------------------------|------------|
| <b>All Schools</b> |            |                    |                         |                                    |            |
| A                  | K-5        | 560                | 36.0                    | 15.6                               | Yes        |
| B                  | K-5        | 470                | 26.3                    | 17.9                               | No         |
| C                  | K-5        | 641                | 45.0                    | 14.2                               | Yes        |
| D                  | K-5        | 474                | 28.5                    | 16.6                               | Yes        |
| E                  | K-5        | 562                | 40.6                    | 13.8                               | Yes        |
| F                  | K-5        | 420                | 26.0                    | 16.2                               | Yes        |
| G                  | K-5        | 425                | 29.3                    | 14.5                               | Yes        |
| H                  | K-5        | 339                | 21.0                    | 16.1                               | Yes        |
| I                  | K-5        | 503                | 31.5                    | 16.0                               | Yes        |

|  |     |       |       |      |     |
|--|-----|-------|-------|------|-----|
| J  | K-5 | 355   | 22.5  | 15.8 | Yes |
| K  | K-5 | 245   | 16.3  | 15.0 | Yes |
| L  | K-5 | 400   | 26.0  | 15.4 | Yes |
| M  | K-5 | 273   | 20.3  | 13.4 | Yes |
| Total                                      |     | 5,667 | 369.3 | 15.4 |     |
| 85% of student/instructional staff ratio*  |     |       |       | 13.1 |     |
| 115% of student/instructional staff ratio* |     |       |       | 17.7 |     |

\*All elementary schools would be comparable if the student/instructional staff ratio falls within 13.1 (15.4 x 0.85) to 17.7 (15.4 x 1.15)

LEA refines the comparison so that it compares:

- Student/instructional staff ratio of high-poverty schools (those with a poverty rate greater than or equal to 60%) with other high-poverty schools
- Student/instructional staff ratio of low-poverty schools (those with poverty rates below 60%) with other low-poverty schools.

| School   | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Free/ Reduced Lunch No. | Poverty Percentage | Comparable |
|--|------------|--------------------|-------------------------|------------------------------------|-------------------------|--------------------|------------|
| <b>High-Poverty Title IA Schools</b>                               |            |                    |                         |                                    |                         |                    |            |
| A  | K-5        | 560                | 36.0                    | 15.6                               | 542                     | 97%                | Yes        |
| B  | K-5        | 470                | 26.3                    | 17.9                               | 425                     | 90%                | Yes        |
| C  | K-5        | 641                | 45.0                    | 14.2                               | 539                     | 84%                | Yes        |
| D  | K-5        | 474                | 28.5                    | 16.6                               | 385                     | 81%                | Yes        |
| E  | K-5        | 562                | 40.6                    | 13.8                               | 435                     | 77%                | Yes        |
| F  | K-5        | 420                | 26.0                    | 16.2                               | 322                     | 77%                | Yes        |
| G  | K-5        | 425                | 29.3                    | 14.5                               | 316                     | 73%                | Yes        |
| H  | K-5        | 339                | 21.0                    | 16.1                               | 249                     | 73%                | Yes        |
| I  | K-5        | 503                | 31.5                    | 16.0                               | 354                     | 70%                | Yes        |
| J  | K-5        | 355                | 22.5                    | 15.8                               | 252                     | 71%                | Yes        |
| Total  |            | 4,994              | 306.4                   | 15.7                               |                         |                    |            |
| 85% of student/instructional staff ratio of high poverty schools   |            |                    |                         | 13.3                               |                         |                    |            |
| 115% of student/instructional staff ratio of high poverty schools* |            |                    |                         | 18.1                               |                         |                    |            |

\*Each high-poverty school is comparable when the student/instructional staff ratio falls within 13.3 (15.7 x .85) to 18.1 (15.7 x 1.15)

| School                                     | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Free/ Reduced Lunch No. | Poverty Percentage | Comparable |
|--|------------|--------------------|-------------------------|------------------------------------|-------------------------|--------------------|------------|
| <b>Low-Poverty Title IA Schools</b>        |            |                    |                         |                                    |                         |                    |            |
| K  | K-5        | 245                | 16.3                    | 15.0                               | 89                      | 36%                | Yes        |
| L  | K-5        | 400                | 26.0                    | 15.4                               | 161                     | 40%                | Yes        |
| M  | K-5        | 273                | 17.0                    | 15.5                               | 112                     | 41%                | Yes        |
| Total                                      |            | 918                | 59.3                    | 15.5                               |                         |                    |            |
| 85% of student/instructional staff ratio*  |            |                    |                         | 13.2                               |                         |                    |            |
| 115% of student/instructional staff ratio* |            |                    |                         | 17.8                               |                         |                    |            |

\*Each low-poverty school is comparable when the student/instructional staff ratio falls within 13.2 (15.5 x .85) to 17.8 (15.5 x 1.15)

**EXAMPLE 6** (LEA establishes a limited comparison group consisting of its lowest-poverty schools and compares all its other schools to the average calculated for the comparison group.)

All elementary schools in the LEA are Title IA schools, and each high-poverty school is compared to a limited comparison group consisting of low-poverty schools. A school is considered high poverty if it has a free or reduced-price meals (FRM) percentage greater than or equal to 60%.

In this example, the LEA bases its comparability determinations on student/instructional staff ratios. All elementary schools in the LEA are Title IA schools and the LEA compares its 12 highest-poverty schools to the two schools with the lowest-poverty rates. The schools would be considered comparable if the student/instructional staff ratio in each of the LEA's 12 highest poverty schools does not exceed 115% of the student/instructional staff ratio for the low poverty comparison group.

| School   | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Free/ Reduced Lunch No. | Poverty Percentage | Comparable |
|--|------------|--------------------|-------------------------|------------------------------------|-------------------------|--------------------|------------|
| <b>High-Poverty Title IA Elementary Schools*</b>                 |            |                    |                         |                                    |                         |                    |            |
| A  | K-5        | 373                | 26.5                    | 14.1                               | 356                     | 95%                | Yes        |
| B  | K-5        | 362                | 26.4                    | 13.7                               | 326                     | 90%                | Yes        |
| C  | K-5        | 313                | 24.6                    | 12.7                               | 265                     | 85%                | Yes        |
| D  | K-5        | 319                | 25.0                    | 12.8                               | 261                     | 82%                | Yes        |
| E  | K-5        | 254                | 24.6                    | 10.3                               | 202                     | 80%                | Yes        |
| F  | K-5        | 371                | 24.4                    | 15.2                               | 293                     | 79%                | Yes        |
| G  | K-5        | 234                | 21.2                    | 11.0                               | 167                     | 71%                | Yes        |
| H  | K-5        | 360                | 26.4                    | 13.6                               | 255                     | 71%                | Yes        |
| I  | K-5        | 330                | 27.0                    | 12.2                               | 232                     | 70%                | Yes        |
| J  | K-5        | 346                | 25.0                    | 13.8                               | 209                     | 60%                | Yes        |
| K  | K-5        | 328                | 26.4                    | 12.4                               | 204                     | 62%                | Yes        |
| L  | K-6        | 266                | 21.4                    | 12.4                               | 160                     | 60%                | Yes        |
| <b>Low-Poverty Title IA Elementary Schools</b>                   |            |                    |                         |                                    |                         |                    |            |
| M  | K-5        | 310                | 23.6                    | 13.1                               | 1                       | 48%                |            |
| N  | K-5        | 376                | 25.7                    | 14.6                               | 1                       | 45%                |            |
|  |            | 686                |                         |                                    |                         |                    |            |
| Average student/instructional staff ratio of low-poverty schools |            |                    |                         | 13.9                               |                         |                    |            |
| 115% of student/instructional staff ratio*                       |            |                    |                         | 16.0                               |                         |                    |            |

\*The services to schools in the LEA would be considered comparable if the student/instructional staff ratio in each high-poverty school does not exceed 16.0 (13.9 x 1.15)

### Self-Reported Data

If a district proves to not be comparable in the initial run of the baseline data supplied via State CPI and lunch data, the district has the opportunity to work with their Title IA Education Program Specialist to adjust the current data to correct entries found to be inaccurate. Once documentation is provided to support the requested changes, the data entries can be adjusted in

the “self-reported” section of the application by the designated Education Program Specialist and the comparability calculations re-run. This process is repeated until comparability is met.

The GaDOE recommends an LEA identify and correct errors in Certified/Classified Personnel Information (CPI) data when utilizing self-reported data to demonstrate comparability. This prevents any possible miscalculation in Full-Time Equivalent (FTE) data collected for Quality Basic Education (QBE) funding.

### **Steps for Self-reporting Data for Comparability**

1. Run a “Title IA Staff Details” report from the Title IA Comparability tab on the ConApp
2. Compare the “Title IA Staff Details” report to the District CPI report
  - a. Cross reference to ensure that in calculating comparability, the LEA only included staff paid with State and local funds. This would exclude staff paid with private or federal funds. Other staff that would be excluded are principals, assistant principals, custodians, cafeteria personnel, school nurses, security personnel, pre-kindergarten teachers, pre-kindergarten paraprofessionals, secretaries, and non-instructional paraprofessionals and other clerical staff.
  - b. Save your work because it will be uploaded as an attachment for self-reported data.
3. If errors are noted between CPI and the Title IA Staff Details report, email your Title IA Education Program Specialist the documentation to highlight the errors. The comparability report will then be recalculated based on the self-reported data. Add/subtract (transfer staff, new hires) staff via journal entries (make sure it shows the journal entries were made back to July) to achieve comparability.
4. If the district is not comparable after completing the steps above, additional tasks will need to be performed and assistance from the Education Program Specialist will be required. For example, if a district busses students to a school outside of the regular attendance zone to provide special services, such as special education and allots additional staff to that school, this may be the issue with comparability. In a case such as this the students and the additional staff would need to be documented and attached to the comparability site. At this point the Education Program Specialist would adjust the staff and enrollment numbers of the affected schools and run the report to determine if the district meets comparability. There may be a variety of reasons that the district is not comparable and once proper documentation is attached the Education Program Specialist will make the adjustments and run the report to determine comparability.
5. After steps 1-4 have been completed and a district is still not comparable, the RAM/P may be used to demonstrate all schools were equitably funded with State and local funding. See example 7 below.
6. After all attempts have been exhausted and the LEA is still not comparable a return of the requisite amount of non-federal funds to compensate for the number of instructional staff missing to meet compliance with comparability may be required.

**EXAMPLE 7** (LEA is not comparable after self-reported data steps have been followed; Resource Allocation Methodology Plan (RAM/P) is used to document comparability.)

Please note that there are LEAs that do not need to have a methodology (RAM/P). But if the LEA has concerns over meeting comparability it is best practice to develop a RAM/P. An LEA does not need to have a RAM/P to comply with ESEA Section 1118(b)(2) if it has:

- One school;
- Only Title IA schools; **or**
- A grade span that contains only:
  - A single school,
  - Non-Title IA schools, **or**
  - Only Title IA schools

In the following example, an LEA provides Title IA services to seven of its eleven elementary schools. (The district serves only elementary schools.) The LEA demonstrates comparability by annually comparing student/instructional staff ratios for each of its Title IA schools to the average student/instructional staff ratios for its non-Title IA schools. The LEA has followed steps for self-reported data and two of the Title IA schools are still not comparable.

| School   | Grade Span | Student Enrollment | FTE Instructional Staff | Student/ Instructional Staff Ratio | Comparable |
|--|------------|--------------------|-------------------------|------------------------------------|------------|
| <b>Title IA Elementary Schools</b>                   |            |                    |                         |                                    |            |
| A  | K-5        | 528                | 70.2                    | 7.5                                | Yes        |
| B  | K-5        | 510                | 49.4                    | 10.3                               | Yes        |
| C  | K-5        | 417                | 38.7                    | 10.8                               | Yes        |
| D  | K-5        | 726                | 49.0                    | 14.8                               | No         |
| E  | K-5        | 189                | 16.0                    | 11.8                               | Yes        |
| F  | K-5        | 808                | 54.0                    | 15.0                               | No         |
| G  | K-5        | 673                | 60.0                    | 11.2                               | Yes        |
| <b>Non-Title IA Elementary Schools</b>               |            |                    |                         |                                    |            |
| H  | K-5        | 1,764              | 114.5                   | 15.4                               |            |
| I  | K-5        | 757                | 70.0                    | 10.8                               |            |
| J  | K-5        | 1,005              | 88.0                    | 11.4                               |            |
| K  | K-5        | 484                | 42.0                    | 11.5                               |            |
| Total  |            | 4,010              | 314.5                   | 12.8                               |            |
| 115% of Student/FTE ratio for non-Title IA, schools* |            |                    |                         | 14.7                               |            |

\*To be comparable, the student/instructional staff ratio for each Title IA elementary school may not exceed 14.7 (12.8 x 1.15)

The LEA must attach the following documentation for RAM/P implementation for the two schools that are not comparable.

- General ledger divided by school. (Detailed Expenditure Report by School - Fund 100).
- Detailed Payroll reports by school, by grade/span, from a point in time - Fund 100.
- Enrollment numbers from the same point in time, by school, by grade/span.
- RAM/P Implementation Report (GaDOE sample template or LEA developed form) indicating:

- Student enrollment by school, by grade/span, from a point in time
- RAM/P staff/student ratio
- Number of staff allocated by RAM/P
- Number of teachers paid with fund 100, by school, by grade/span
- Instructional Supplies Funding Allocation by school and grade/span

Due to the requirement that an LEA must develop procedures for complying with the comparability requirements [Section 1120A(c)(3)], a district must ensure that these procedures are in writing and, should, at a minimum:

- Include a timeline for demonstrating comparability
- Include the identification of the office responsible for making comparability calculations
- Include the measure and process used to determine whether schools are comparable and
- Include how and when the district made adjustments to schools that are not comparable

## Frequently Asked Questions

### **Q1. Why is Title IA Comparability necessary?**

Demonstrating comparability is a prerequisite for receiving Title IA funds. Because Title IA allocations are made annually, comparability is an annual requirement. There are several ways that an LEA may meet the comparability requirement. The GaDOE has established the student/instructional staff ratio as the method for LEAs to use to determine comparability. Should an LEA experience an unusual circumstance that would indicate the need to use another method to determine comparability, the LEA must submit a request in writing to the Title IA Education Program Specialist serving the LEA.

In addition, ESSA emphasizes the purpose of Title IA which is to provide all children significant opportunity to receive a fair and high-quality education, and to close educational achievement gaps. Thus, the intended purpose of Title IA funds is to deliver additional resources to low-performing students from high-poverty neighborhoods, beyond what State and local funds provide. Specifically, Section 1118 of ESSA requires that LEAs provide State and locally-funded services in Title IA schools that, taken as a whole, are at least comparable to services provided in schools that are not Title IA. This comparability requirement ensures that Title IA funds are not spent on resources that non-Title IA schools obtain with State and local funds; that would violate the supplemental purpose of Title IA as stipulated in the statute.

### **Q2. Does the comparability requirement go away under ESSA?**

LEAs must still meet comparability requirements, as outlined in Section 1118 of ESSA.

### **Q3. Are charter schools included in the calculations to determine if Title IA schools are comparable?**

All K-12 schools are included.

### **Q4. Which districts need to demonstrate comparability?**

The comparability requirement does not apply to an LEA that has only one building for each grade span. A variation of this situation would be where an LEA has only two schools, one of which is a large school and the other is a small school. In this case, the comparability requirement would not apply because the LEA would compare the small school to itself and the large school to itself. The large school would need to be twice the size of the smaller school plus one to qualify for the large vs. small exemption. An LEA may also exclude schools with 100 or fewer students from its comparability determinations.

### **Q5. How do districts in Georgia demonstrate comparability?**

The GaDOE requires each school district to demonstrate comparability on an annual basis. GaDOE has developed and utilizes a computerized application to calculate comparability for all school districts in the State. This application is designed to run every possible permutation available to demonstrate comparability. The application is housed in the ConApp portal and automatically incorporates current FTE, CPI, and poverty data collected by the GaDOE in the fall of each school year. If a district proves to not be comparable in the initial run of the baseline data

supplied via State data, the district has the opportunity to work with their Title IA Education Program Specialist to adjust and correct data entries found to be inaccurate. Once documentation is provided to support the requested changes, the data entries can be adjusted in the “self-reported” section of the application by the Education Program Specialist and the comparability calculations re-run. This process is repeated until comparability is met. If comparability is still not met, the district will either utilize their RAM/P to demonstrate all of their schools were equitably funded with State and local funding in order to demonstrate comparability or after all attempts have been exhausted and the LEA is still not comparable a return of the requisite amount of non-federal funds to compensate for the number of instructional staff missing to meet compliance with comparability may be required.

**Q6. Which instructional staff should be included in comparability calculations?**

When an LEA measures compliance by comparing student/staff ratios, the LEA should consistently include the same categories of staff members in the ratios for both Title IA and non-Title IA schools. Instructional staff may include teachers and other personnel assigned to schools who provide direct instructional services, including music, art, and physical education teachers; guidance counselors; speech therapists; and media specialists as well as other personnel who provide services that support instruction, such as school social workers and psychologists. In calculating comparability, an LEA must include only staff paid with State and local funds. This would exclude staff paid with private or federal funds. Other staff that would be excluded are principals, assistant principals, custodians, cafeteria personnel, school nurses, security personnel, pre-kindergarten teachers, pre-kindergarten paraprofessionals, secretaries, and noninstructional paraprofessionals.

**Q7. Where can additional information about the Title IA comparability be found?**

More information can be found on the GaDOE Title IA [Other Resources web page](#).

**Q8. Who should the District contact with additional questions on comparability?**

The Title IA Education Program Specialist assigned to your district can assist you with any additional questions on comparability.

**Q9. Why should the District use the RAM/P after other steps in self-reported data have been used?**

The GaDOE recommends an LEA identify and correct errors in Certified/Classified Personnel Information (CPI) data when utilizing self-reported data to demonstrate comparability. This prevents any possible decline in Full-Time Equivalent (FTE) data collected for Quality Basic Education (QBE) funding. By using the Title IA Staff Details report, districts compare staff coded in CPI as funded with State and local funds to payroll reports ensuring correct coding. Many districts who are unable to demonstrate comparability with Data Collection Reported, find errors in CPI at schools (in school CPI data). Revised reports ensure correct CPI data and will reduce the number of schools not comparable. In addition, using the 15% variance worksheets may also decrease the number of schools that are not comparable. The district will only provide documentation of correct implementation of the RAM/P for schools that are not comparable. For example, a Consolidation of Funds district originally had seven schools that were not comparable, after correcting CPI data the number was reduced to four, using the 15% variance worksheets reduced the number to two. The district then submitted RAM/P implementation documentation for the two schools that were not comparable.

The Title IA Education Program Specialist assigned to your district can assist you with any additional questions on comparability.

Additional Resources:

*Non-Regulatory Guidance - [Title I Fiscal Issues: Maintenance of Effort, Comparability, Supplement Not Supplant, Carryover, Consolidating Funds in Schoolwide Programs, Grantback Requirements](#)*

### **Assessment Security**

The LEA needs a system for ensuring and maximizing the quality, objectivity, utility, and integrity of assessment and accountability information disseminated by the LEA. The LEA has a system for monitoring and improving the on-going data quality of its assessment system. ESEA: Section 1111. The LEA must have a test security policy/plan that includes consequences for violation. The district must also maintain copies of communication to local educators regarding the test security policy/plan.

### **Title IA Committee of Practitioners (COP)**

The Georgia Title IA Committee of Practitioners as Established under Section 1903 of Title IA of ESSA, State administration of the Title IA of the Elementary and Secondary Education Act of 1965 as amended by the ESSA is directed to be substantially involved in the review of and comment on any proposed or final State rules, regulations, and policies relating to Title IA prior to their publication.

Committee members are provided updates on national education reform activities, changes in Title IA legislation and regulations, and other pertinent State and federal information.

Presently, the 30-member COP includes representatives from LEA administrators; teachers, including vocational educators; parents; members of local boards of education; representatives of private school children; representatives of charter schools; representatives of pupil services personnel; and one representative of the Georgia General Assembly.

Members are nominated for three years by the Office of School Improvement's Federal Programs Division and approved by the State Board of Education (SBOE). Nominated candidates represent the required representative groups and each congressional district in the State. Vacancies are replaced with individuals from similar representative groups and regions of the State.

This committee meets at a minimum of two times during the regular school year, once in the fall and once in the spring, with additional sub-committee meetings as appropriate. Actions required by the membership determine the need to postpone or convene additional meetings.

A Title Programs Division designee acts as the executive secretary and develops meeting agendas with input from the Title IA Program Manager, the Federal Programs Director, the Deputy Superintendent of the Federal Programs Division, the COP chairperson, and membership. Documentation of all meetings, agendas, and other pertinent data are maintained by at the GaDOE.

## **Title IA Committee of Practitioners Guidelines**

### **Membership**

Section 1603 of ESSA requires representatives from the following categories: Section 1903 of ESSA requires representatives from the following categories:

- A majority of its members, representatives from LEAs;
- Administrators, including the administrators of programs described in other parts of this title;
- Teachers from traditional public schools and charter schools (if there are charter schools in the State) and career and technical educators;
- Principals and other school leaders;
- Parents;
- Members of local school boards;
- Representatives of private school children;
- Specialized instructional support personnel and paraprofessionals;
- Representatives of authorized public chartering agencies (if there are charter schools in the State);  
**and**
- Charter school leaders (if there are charter schools in the State).

### **Duties**

Duties are related to the implementation of Title IA ESEA Section 1603: Duties are related to the implementation of Title IA ESEA Section 1903:

- The duties of the committee will include a review, before publication, of any proposed or final State rule or regulation. In an emergency, where such rule or regulation must be issued with a very limited time to assist local school districts with the operation of the program under Title IA, the GaDOE may issue a regulation without prior consultation but will immediately thereafter convene the State committee of practitioners to review the emergency regulation before issuance in final form.
- The duty of the committee will be to advise GaDOE on other pertinent issues related to Title IA.

### **Term Limits**

- Members will be nominated for three years by the Federal Programs Division.
- Final approval of the COP membership will be made by the SBOE.
- The State School Superintendent will make nominations for vacated terms to the SBOE by July 30 of each year.
- Vacated terms will be replaced with individuals from similar representative groups.

## Meeting Schedule

- The COP membership will convene two times each year, once in the fall and once in the spring. The membership may determine the need to postpone or convene other meetings as needed.
- A Title IA program designee will act as the executive secretary and will develop meeting agendas with input from membership and maintain, at GaDOE, documentation of all meetings, agendas, and other pertinent data. A Title IA program designee will act as the executive secretary and will develop meeting agendas with input from membership and maintain, at GaDOE, documentation of all meetings, agendas, and other pertinent data.

## Member Reimbursement

- The COP members will be reimbursed for travel, lodging, and meals when attending meetings.
  - The member must present a State of Georgia Exemption of the Local Hotel/Motel Excise Tax form when registering at a hotel/motel and must secure a government rate.
  - The member must complete and submit a Consultant Expense form within 30 days of the meeting to the designated GaDOE employee.
  - The member must present original lodging receipts with a “zero” balance with the Consultant Expense form. Food and mileage receipts are not required.

## Selection Process

- Title IA Education Program Specialists and other organization representatives who have working knowledge of Title IA throughout the State are asked to make nominations of potential members of the COP from all areas required by the law. The concern of GaDOE is to assure that the committee:
  - Includes, most as a majority of its members, representatives from LEAs as required by ESSA.
  - Has statewide representation.
  - Remains manageable in size.

## Academic Achievement Awards Program

### Title I Distinguished and Reward Schools Program

The GaDOE recognizes K-12 Title IA schools for significant progress in improving student achievement and making significant progress in closing the achievement gap.

The Title I Academic Achievement Awards program honors three categories of schools: Title I Distinguished Schools, Title I Reward Schools, and National ESEA Distinguished Schools.

- A **Title I Distinguished School** is a Title IA school among the top 5% Schoolwide or top 5% Targeted Assistance Title IA schools in the State that have the highest absolute performance for the all-students group based on the current statewide assessment. A school may not be classified as a Title I Distinguished School if it is currently identified as a Targeted Support and

Improvement School (TSI), Additional Support and Improvement School (ATSI) or a Comprehensive Support and Improvement School (CSI).

- A **Title I Reward School** is a Title IA school among the top 5% of Title IA schools in the State that is making the most progress in improving the performance of the all-students group over the most recent two years on the statewide assessments. A school may not be classified as a Title I Reward School if it is currently identified as TSI, ATSI or CSI.
- A **National ESEA Distinguished School** is one of two schools selected from the Schoolwide Program Title IA Schools identified as Title I Distinguished Schools described above. All Schoolwide Program Title I Distinguished Schools will be invited to submit make application for the National recognition.

#### **How State Data Will Be Run to Determine List of Title I Distinguished Schools (Beginning 2019)**

- Count the number of Title IA schools (SWP and TAP separately) in the State for the previous school year.
- Multiply the number of Title IA schools (SWP and TAP separately) in the State for the previous school year by 5%.
- The resulting value is the number of Title IA schools (SWP and TAP separately) in the State that are to be identified as Distinguished Schools.
- Rank the Title IA schools (SWP and TAP separately) based on the single assessment score results from highest achievement to lowest achievement. Rank the Title IA schools (SWP and TAP separately) based on the single assessment score results from highest achievement to lowest achievement.
- Remove schools from the list of schools that have been identified as CSI, or TSI Schools.
- Identify the top 5% of Title IA schools in any given fiscal year as Title I Distinguished Schools.

#### **How State Data Will Be Run to Determine List of High-Progress Title I Reward Schools (Beginning 2020)**

- Count the number of Title IA schools in the State for the previous school year.
- Multiply the number of Title IA schools in the State for the previous school year by 5%.
- The resulting value is the number of Title IA schools in the State that are to be identified as Title I Reward Schools.
- At the school level, aggregate the all-student and subgroup achievement results based on assessment data from the previous two-years for all Georgia Milestone Assessments and Georgia Alternate Assessments (GAAs). For a group (all-students as well as the remaining nine traditional subgroups) to be considered in the calculations, the group must meet the minimum  $n$  size of 15, where each member of the group has a valid assessment for each content area.
- Rank the schools based on the greatest amount of progress.

- Remove schools from the list of schools that have been identified as CSI, TSI or ATSI Schools.
- Remove schools from the list of schools that have been identified as CSI, TSI or ATSI Schools.
- Identify the top 5% of Title IA schools in any given fiscal year as Title I Reward Schools.

### **How State Data Will Be Run to Determine Georgia’s two representatives as National ESEA Distinguished Schools (Beginning 2019)**

- Invite all SWP Title IA Schools identified as Distinguished (State level) Schools to make application for National ESEA Distinguished recognition. Invite all SWP Title IA Schools identified as Distinguished (State level) Schools to make application for National ESEA Distinguished recognition.
- Applications received will be numbered and identifying information redacted to provide complete anonymity to all readers/scorers. Applications received will be numbered and identifying information redacted to provide complete anonymity to all readers/scorers.
- Applications will be read blindly and scored by a minimum of three readers and an average will be added to the other qualifying criteria (CCRPI score for the current year, growth from previous year CCRPI and most recent CCRPI, and poverty percentage of the school’s population).
- The top two resulting schools will be named as Georgia’s representatives for the National ESEA Distinguished School Award sponsored by the National Association of ESSA State Program Administrators (NAESPA).

### **How State Will Recognize National ESEA Distinguished Schools and Georgia Title I Distinguished and Reward Schools**

Georgia will recognize schools identified as Title I Distinguished and Reward schools each year. Georgia will recognize schools identified as Title I Distinguished and Reward schools each year. Title I Distinguished schools will receive a certificate, recognition flag, and listing on the Title IA website. Title I Reward Schools will receive a certificate and listing on the Title IA website. The two schools recognized as Georgia’s National ESEA Distinguished Schools will receive \$20,000 from State Title IA funds to facilitate travel to the National ESEA Conference for participation in the National Distinguished School Recognition Ceremony. The two schools recognized as Georgia’s National ESEA Distinguished Schools will receive \$20,000 from State Title IA funds to facilitate attendance to the National ESEA Conference for participation in the National Distinguished School Recognition Ceremony. The two nationally identified schools may also receive recognition paraphernalia (flags, certificates, etc.) from the NAESPA organization.

### **Title IA and English Learners**

English Learners (ELs) are students whose primary language is a language other than English [See ESSA 8101(20) for full definition]. ELs are a diverse group of students, representing many language backgrounds and nationalities (including many born in the US). An EL student may be from any grade, academic proficiency, or socioeconomic level in our society. The only characteristics shared by all ELs is that they have already developed a primary language other than English, are developing English Language proficiency, and need linguistic support to help them access opportunities, both academic and

otherwise, in schools where English is the language of instruction. The purpose of this section is to highlight the role of ELs in ESSA as well as briefly outline the requirements in serving EL students.

## **English Learners and ESSA**

Previously referred to as Limited English Proficient (LEP) or English Language Learners (ELLs), ESSA replaced this language with the more student-first term, English Learner (EL). This shift in terminology reflects a focus on the learner rather than a perceived limitation. ESSA also expanded the attention given to the academic and language proficiency aspects of ELs' participation in school. Expectations for serving ELs are found in nearly all formula grant programs. Discussions about ELs cannot be limited to Title III, Part A alone; Civil Rights laws, Title IA and Title III, Part A all contain requirements for serving EL students. An understanding of all requirements as well as increased collaboration between programs are necessary for providing effective EL programming and services. In essence, having the mindset of sharing responsibility for ELs' success in education is a priority.

## **Basic Requirements Under Federal Law**

All districts and schools have an obligation to provide appropriate services under Title VI of the Civil Rights Act of 1964 and 54 of the Equal Education Opportunities Act (EEOA) of 1974. Civil Rights and EEOA required EL services cannot be paid for with Title IA or Title III, Part A funds. All districts have an obligation under these laws to:

- Identify and assess all potential EL students;
- Provide EL students with a language assistance program;
- Staff and support EL programs;
- Provide meaningful access to all curricular and extracurricular programs;
- Avoid unnecessary segregation of EL students;
- Evaluate EL students for special education services and provide special education and English language services;
- Meet the needs of EL students who opt out of EL programs or EL services;
- Monitor and exit EL students from EL programs and services;
- Evaluate the effectiveness of the district's EL program; and
- Ensure meaningful communication with limited English proficient parents.

For more information on these legal obligations, see the [January 7, 2015 Dear Colleague Letter](#) issued by the Office for Civil Rights (OCR) at the ED and the Civil Rights Division at the U.S. Department of Justice (DOJ). ED and DOJ are both responsible for enforcing Title VI in the education context while DOJ is responsible for enforcing the EEOA. Additional support for meeting these requirements can be found [here](#).

## Assessment and Accountability Requirements

The following chart provides a summary of the assessment and accountability requirements for serving ELs under Title IA.

| Title IA Requirement  | Summary and Significance  |
|---|---|
| <b>English Language Proficiency Standards ESSA 1111(b)(1)(F)</b>            | Each State must adopt ELP standards that are derived from the 4 recognized domains of speaking, listening, reading, and writing; address the different proficiency levels of ELs; and align with the challenging State academic standards. <b>Georgia adopted the WIDA English Language Development Standards to meet this requirement.</b>   |
| <b>English Language Proficiency Assessment ESSA 1111(b)(2)(G)</b>           | Each State must demonstrate that LEAs will provide an annual assessment of ELP of all ELs and that the assessment is aligned with the State's ELP standards. (Note: This requirement has always been included under Title IA. ESSA removed the identical requirement from Title III, Part A). <b>Georgia uses WIDA's ACCESS for ELLs 2.0 as the annual ELP assessment.</b>  |
| <b>Accountability: English Learner Subgroup ESSA 1111(b)(3)(B)</b>          | Former ELs are to be included in the EL subgroup for accountability purposes for 4 years. Prior to ESSA, they were included for only 2 years.   |
| <b>Accountability: Long Term Goals ESSA 1111(c)(4)(A)(ii)</b>               | Each state must establish long-term goals and measurements of interim progress (MIPs) for increases in the percentage of ELs making annual progress toward attaining ELP, as measured by the State's ELP assessment.<br><b>Districts receiving Title IA funds are now held accountable for this measure rather than only districts receiving Title III, Part A funds.</b> (See the CCRPI Progress Toward Proficiency Indicator.)  |
| <b>Accountability: Annual Meaningful Differentiation ESSA 1111(c)(4)(C)</b> | Accountability determinations known under NCLB as Adequate Yearly Progress (AYP) are now known as Annual Meaningful Differentiation (AMD). AMD includes separate accountability indicators for ELs and the requirement to include differentiation for underperforming subgroups. <b>A school may be identified for Targeted Support and Improvement (TSI) based solely on the academic achievement of ELP performance of the EL subgroup, allowing school improvement funds to be used for ELs for the first time when available.</b> |

## Parent Engagement Requirements

ESSA 1112(e) includes several requirements related to the parents of all ELs in the district. Section E of the [Non-Regulatory Guidance](#) contains additional information on engaging the parents of ELs.

## Parent Notification

ESSA 1112(e)(3)(A-B) requires each district to notify parents of their child's identification as an EL and their placement in a Language Instruction Educational Program (LIEP), when using funds under Title IA or Title III, Part A to provide supplemental language services to ELs. The parent notification must include:

- The reason for the identification of the child as an EL;
- The child’s level of English language proficiency, how the level was assessed, and the status of the child’s academic achievement;
- Methods of instruction used in the program in which the child is, or will be, participating, and the methods of instruction used in other available programs, including how the programs differ;
- How the program will meet the educational strengths and needs of the child and help the child achieve English language proficiency, and meet academic standards;
- Exit requirements for the program, expected rate of transition to a classroom not tailored for EL students, and expected rate of high school graduation;
- In the case of a child with a disability, how the program meets the annual goals in the child’s IEP; and
- Information regarding parents’ right to withdraw the child from a program upon their request, and to decline enrollment or choose another program or method of instruction, if available.

This notification must be provided no later than 30 days after the beginning of the school year or within the first two weeks of placement in an LIEP for students who enroll after the start of the school year.

### **Parent Participation**

ESSA 1112(e)(3)(C) states that each district must implement an effective means of outreach to the parents of all ELs to inform them of how they can:

- Be involved in the education of their children; and
- Be active participants in assisting their children to:
  - Attain English proficiency;
  - Achieve at high levels within a well-rounded education; and
  - Meet the challenging State academic standards expected of all students.

Implementing an effective means of outreach must include holding and sending notice of opportunities for regular meetings for the purpose of formulating and responding to recommendations from the parents of ELs.

### **Notice and Format**

ESSA 1112(e)(4) requires the notice and information provided to parents under ESSA 1112(e) be in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand. This is specific to the parent notification and outreach requirements of Title IA. Providing translation and interpretation services related to core instruction and the core EL program are district requirements under the civil rights laws.

## Coordination with Other Programs

ESSA 1112(c) states that the district's Title IA plan must assure that the district will coordinate and integrate services provided under Title IA with other educational services at the district or school level, such as services for ELs, in order to increase program effectiveness, eliminate duplication, and reduce fragmentation of the instructional program.

The Title IA program should support and supplement the district's core EL program as well as work in cooperation with the EL and/or Title III, Part A programs in order to maximize resources. The two programs should collaborate to design programs and interventions which address the needs of EL students. The regular sharing of information and expertise will allow both programs to provide effective services to ELs.

## Monitoring Process for ELP Assessment Participation Rate

1. All LEAs should review their most current year ELP Assessment Participation Rate. This data can be found in the portal as the ELP Assessment Participation (ELPAP) application.
2. The ELPAP application has three help documents to support LEAs.
  - LEA User Navigation Guide
  - LEA Corrective Action Plan Template
  - ACCESS Non-Participation Examples & Solutions
3. If the LEA's ELPAP Rate was less than 95% with rounding, a corrective action plan (CAP) is required.
4. Using the CAP Template, develop a plan to address ACCESS/Alternate ACCESS Non-Participation
  - LEA will identify the applicable reasons for non-participation.
  - LEA will write the procedures/steps to take to correct non-participation and include the name of the person/roles to monitor the procedures, the timeline, etc.
5. LEA will submit the ELPAP CAP as an attachment in the general attachments section of the ConApp - **(on or before the designated due date)**.
  - Title IA and Title III, Part A Education Program Specialists will review CAP and acknowledge submission.
6. LEA will implement ELPAP CAP to ensure that the current non-participation reasons will be avoided during future ACCESS/Alternate ACCESS test administrations.
7. Title IA and Title III, Part A Education Program Specialists will contact all LEAs whose ELP Assessment Participation Rate was below 95% with rounding, to discuss supports and services the GADOE can provide to help them meet the federal goal of assessing all English learners' English language proficiency annually.
8. Important deadlines affecting ELP Assessment processes:

- Registration Processes – Ongoing
- EL Exit Date Corrections – October FTE
- ACCESS/Alternate ACCESS Testing Window
- Data Validation Windows

### **State Report Card**

The LEA has a system for ensuring and maximizing the quality, objectivity, utility, and integrity of assessment and accountability information disseminated by the LEA. The LEA has a system for monitoring and improving the on-going data quality of its assessment system (ESEA Section 1111). The District/School State Report Card shall be provided for public access on the district website. A best practice is to have a link on each school's website to the State Report Card.

### **Inventory**

ESSA requires LEAs implement and maintain financial management systems that substantially comply with federal systems management requirements. These requirements, detailed in 2 C.F.R., Part 200.62 Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 C.F.R., Part 200) states that LEAs shall provide: "effective control over and accountability for all funds, property, and other assets. Recipients shall adequately safeguard all assets and assure they are used solely for authorized purposes".

Detailed information for developing and maintaining inventory management procedures are outlined in the Federal Programs Handbook.