



Implementing Title I in Georgia Schools

Handbook for Title I Directors



Richard Woods, State School Superintendent

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**Implementing Title I in Georgia Schools
FY18 Handbook for Title I Directors**

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For additional information regarding this handbook, contact:

*Georgia Department of Education
Federal Programs Division
1858 Twin Towers East
Atlanta, Georgia 30334*

**Implementing Title I in Georgia Schools
FY18 Handbook for Title I Directors**

Table of Contents

LEA Identification and Selection of School Attendance Areas and Schools, and Allocations of Title I Funds to School Attendance Areas and Schools (Sec. 1113)	5
General Selection Requirements	5
LEA Discretion in Selecting Participating Areas and Schools	6
Allocating Title I Funds to Participating Areas and Schools	7
Opening New Schools: Gathering Needed Data – Enrollment and Free and Reduced Numbers	9
Allocating Title I Funds to Redistricted Schools	9
Directions for Calculating Eligible Attendance Areas	10
Healthy, Hunger-Free Kids Act of 2010 (Act)	13
Background	13
Guidance for Meeting Title I Requirements	14
Charter Schools and Title I, Part A	18
Allocation of Federal Formula Funds to Charter Schools–Within State Allocations	20
Federal Formula Allocation During First Year and for Successive Enrollment Expansions	21
Comparability of Services	23
Introduction	23
Requirement	24
Criteria for Meeting Comparability	24
Developing Procedures for Compliance	25
Compliance Timeline	26
Instructional Staff Members to be Included	26
Grouping of Schools for Comparability Comparison	27
LEA Organization	27
Grouping by Size of Enrollment	28
Grouping When All Schools Receive Services	29
Examples of Ways to Meet the Comparability Requirement	30
Meeting Comparability through the Resource Allocation Process	37
Schoolwide Programs Definition and Details	38
Using Title I Schoolwide Programs to Support School Reform	38
Benefiting from Operating a Schoolwide Program	39
Implementing a Schoolwide Program	39
Safeguarding the Interests of Historically Underserved Populations	40
Using Federal Funds Flexibly in a Schoolwide Program	42

**Implementing Title I in Georgia Schools
FY18 Handbook for Title I Directors**

Examples of Uses of Funds in a Schoolwide Program (Based on the Needs Assessment)	42
Existing Guidance on Schoolwide Programs	42
Schoolwide Programs (SWP) Tools and Resources	43
Targeted-Assistance Title Programs	44
Targeted-Assistance Programs Definition and Description	44
Components of a Targeted-Assistance School Program	46
Requirements	48
Simultaneous Service	48
Comprehensive Services	48
Professional Development	49
Existing Targeted-Assistance Programs	49
Title I Committee of Practitioners (COP)	50
Title I Committee of Practitioners Guidelines	50
Membership	50
Duties	51
Term Limits	51
Meeting Schedule	51
Member Reimbursement	52
Selection Process	52
Intradistrict Transfer Option	52
Paraprofessionals	53
Professional Qualification Requirements for Paraprofessionals in CHARTER SCHOOLS that DO NOT Require Certification:	53
Parent and Family Engagement	54
Notices to Parents of English Learners (ELs)	54
Academic Achievement Awards Program	56
Title I Reward Schools Program	56
Introduction	56
Timelines	57
How State Data Will Be Run to Determine List of Highest-Performing Title I Reward Schools	57
How State Data Will Be Run to Determine List of High-Progress Title I Reward Schools	57
How State Will Recognize and Reward the Title I Highest-Performing and High-Progress Schools	58

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Purpose of Title I, Part A

The purpose of Title I, Part A is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps (Sec. 1001)

LEA Identification and Selection of School Attendance Areas and Schools, and Allocations of Title I Funds to School Attendance Areas and Schools (Sec. 1113)

A local educational agency (LEA) will use funds received under Title I, Part A only in eligible school attendance areas. The term “school attendance area” means, in relation to a particular school, the geographical area in which the children who are normally served by that school reside. For Georgia, this includes any public, 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.

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

General Selection Requirements

- An LEA must annually rank all of its school attendance areas (the geographic area from which a public school draws its children) according to their percentages of poverty.
 - An LEA must use the same measure of poverty for:
 - Identifying eligible school attendance areas.
 - Determining the ranking of each area.
 - Determining the allocation for each area.
 - The LEA must select a poverty measure from the following options:
 - Children ages 5 to 17 in poverty as counted in the most recent census data approved by the secretary.
 - Children eligible for free or reduced meals (FRM) under the Richard B. Russell National School Lunch Act.
 - Children in families receiving assistance under the state program funded under Title IV of the Social Security Act Temporary Assistance for Needy Families (TANF).

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

- Children eligible to receive medical assistance under the Medicaid program.
- A composite of any of the above measures.
- Identified students under Community Eligibility Provision (CEP) are eligible under the Richard B. Russell NSLP. If an LEA selects NSLP data as its poverty measure (or uses the data in a composite) and has a CEP school, the CEP data will be part of the NSLP data that the LEA uses for within district allocation.
- An LEA must rank school attendance areas based on the percentage (not the number) of low-income children counted.
- After an LEA has ranked all of its school attendance areas by poverty, the LEA must first serve, in rank order of poverty, its areas above 75-percent poverty, including any middle schools or high schools.
- EXCEPTION—An LEA may choose to lower the 75-percent poverty threshold to 50-percent for high schools.
- Only after an LEA has served all of its areas with a poverty rate above 75-percent may the LEA serve lower-ranked areas. The LEA has the option to (1) continue on with the districtwide ranking or (2) rank remaining areas by grade-span groupings.
- If an LEA has no school attendance areas above 75-percent poverty, the LEA may rank its schools districtwide or by grade-span groupings.
- An LEA's organization of its schools defines its grade-span groupings. For example, if an LEA has elementary schools serving all elementary grades, middle schools, and high schools, the grade-span groupings would be grades K 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).
- An LEA with an enrollment of less than 1,000 students or with only one school per grade span is not required to rank its school attendance areas.

LEA Discretion in Selecting Participating Areas and Schools

- An LEA may:
 - Designate as eligible any school attendance area or school in which at least 35-percent of the children are from low-income families; i.e., the 35-percent rule.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Keep in mind that to be a Schoolwide School, the poverty level must be 40% or above.

- Use Title I, Part A funds in a school that does not serve an eligible school attendance area if the percentage of children from low-income families enrolled in the school is equal to or greater than the percentage of such children in a participating school attendance area of the LEA.
- For one additional year only, designate and serve a school attendance area or school that is no longer eligible but was eligible and served in the preceding year. When using this option, an LEA must meet the requirement to serve schools in rank order. This is commonly known as the Grandfather Clause.

Allocating Title I Funds to Participating Areas and Schools

- The Georgia Department of Education (Department) has established that the ranking of school attendance areas to determine eligible attendance areas and the rank order in which to allocate Title I, Part A funds to participating attendance areas will be based on the total number of children enrolled in the school, minus the number of pre-kindergarten children enrolled in the school and upon a poverty measure selected by the LEA from the list above.
- The number of low-income children will be based on either of the following poverty measurers: (1) The total number of children eligible for free or reduced meals (FRM) under the Richard B. Russell National School Lunch Act who are enrolled in the school, minus the number of pre-kindergarten students eligible for FRM under the Richard B. Russell National School Lunch Act. (2) The total number of students eligible using direct certification data minus pre-kindergarten students, such as data from the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) program. This is commonly known as the Community Eligibility Provision (CEP).
- An LEA must allocate Title I, Part A funds to participating school attendance areas or schools in rank order based on the total number of children from low-income families in each area or school. An LEA with an enrollment of less than 1,000 students or with only one school per grade span is not required to allocate funds to areas or schools in rank order.
- If an LEA serves any areas or schools below 35-percent poverty, the LEA must allocate to all its participating areas or schools an amount for each low-income child in each participating school attendance area or school that is at least 125-percent of the LEA's allocation per low-income child. This is commonly known as the 125-percent Rule.
 - An LEA's allocation per low-income child is the total LEA allocation under Title I, Part A, Subpart 2 divided by the number of low-income children in the LEA as determined using the poverty measure selected by the LEA to identify

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

eligible school attendance areas. The LEA then multiplies this per-child amount by 125-percent.

- An LEA calculates 125-percent of its allocation per low-income child before the LEA reserves any funds.
 - An LEA must allocate at least this amount for each low-income child in every school the LEA serves, not just for those schools below 35-percent poverty.
 - If remaining funds are not sufficient to fully fund the next ranked eligible school attendance area or school, the LEA may serve the area or school if it determines the funds are sufficient to enable children to make adequate progress toward meeting the state's challenging performance standards.
 - An LEA serving only areas or schools at or above 35-percent poverty must allocate funds in rank order, on the basis of the total number of low-income children in each area or school, but is not required to allocate 125-percent of the LEA's allocation per low-income child (described above). However, in determining what per-child amount to allocate, the LEA should bear in mind the purpose of such funding is to enable children who are most at-risk of not meeting the state's challenging student academic achievement standards. The per-child allocation amount must be large enough to provide a reasonable assurance that a school can operate a Title I program of sufficient quality to achieve that purpose.
- An LEA is not required to allocate the same per-child amount to each area or school. However, the LEA must allocate a higher per-child amount to areas or schools with higher poverty rates than it allocates to areas or schools with lower poverty rates.
 - An LEA that opts to serve schools below 75-percent poverty using grade-span groupings may determine different per-child amounts for different grade spans, as long as those amounts do not exceed the amount allocated to any area or school above 75-percent poverty. Per-child amounts within grade spans may also vary, so long as the LEA allocates higher per-child amounts to areas or schools with higher poverty rates than it allocates to areas or schools with lower poverty rates.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Opening New Schools: Gathering Needed Data – Enrollment and Free and Reduced Numbers

Allocating Title I Funds to Redistricted Schools

- When an LEA redistricts schools, the actual October FTE data from the year the redistricting occurs or adjusted October FTE data from the year prior to redistricting 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 redistricting 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 I, Part A Improving Academic Achievement program within the consolidated application.

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 redistricting 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 redistricting schools; names, addresses, and grade levels (Pre-K will later be subtracted) of students affected by changes in school assignment (with assistance from the district transportation department); and the October FRM eligibility status of students affected by changes in school assignment (with assistance from the district 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. After all students who are affected by the redistricting have been added to the school they would attend if the new redistricting was in place and subtracted from the school they currently attend, totals the new enrollment number for each school.
 - Find a grand total for the newly created enrollment for all schools, and verify that this

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

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 consolidated application. The adjusted numbers will be recorded in the Title I, Part A 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 redistricting was in place, and subtract students qualifying for FRM from the schools they currently attend based on the new redistricting.
- 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 consolidated application. The number will be recorded in the Title I, Part A Improving Academic Achievement program on the Public School Allocations tab.
- The LEA must keep all documents on file that were used to redistrict/rezone students. The Title I Area Specialist may request the LEA to upload some of the documents onto the Attachment Tab within the Consolidated Application.

Directions for Calculating Eligible Attendance Areas

Local educational agencies (LEAs) should use the eligible attendance areas worksheet embedded in the Title I, Part A Academic Achievement consolidated application.

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.

Additional resources:

- Non-Regulatory Guidance – Local Educational Agency Identification and Selection of School Attendance Areas and Schools and Allocation of Title I Funds to Those Areas and Schools located at: <http://www.ed.gov>
Type *attendance areas* in the **ed.gov** search box, and click **Search**.

The exhibits below show two methods of determining eligible attendance areas (schools).

**Implementing Title I in Georgia Schools
FY18 Handbook for Title I Directors**

- Exhibit 1 depicts listing all attendance areas (schools) without regard to the grade level.
- Exhibit 2 depicts listing attendance areas (schools) based on grade levels.

Exhibit 1 – Percentage Method without Grade-Span Grouping

1 Attendance Area (School)	2 Enrollment	3 No. of Low-Income Children	4 Poverty Percentage
Elementary School A	420	252	60.00%
Middle School B	350	175	50.00%
Elementary School C	340	105	30.88%
High School D	375	56	14.93%
Elementary School E	404	42	10.40%
Elementary School F	340	17	5.00%
TOTALS	2229	647	29.03%
The district average percentage is 29.03%; therefore, schools A, B, and C qualify.			

Exhibit 1: Rank the attendance areas (schools) from highest to lowest percentage of poverty children.

Schools A, B, and C qualify because schools A and B are above 35-percent poverty and school C is above the LEA average of 29.03-percent. Please note the 125-percent rule would apply if the LEA elects to serve schools below 35-percent poverty.

**Implementing Title I in Georgia Schools
FY18 Handbook for Title I Directors**

Exhibit 2 – Percentage Method with Grade-Span Grouping

1 Attendance Area (School)	2 Enrollment	3 No. of Low-Income Children	4 Poverty Percentage
Elementary Schools			
Elementary School A	480	183	38.13%
Elementary School B	525	174	33.14%
Elementary School C	631	195	30.90%
Elementary School D	236	58	24.58%
Elementary School E	380	62	16.32%
Elementary School F	450	64	14.22%
Elementary School G	315	27	8.57%
TOTALS	3017	763	25.29%
Middle Schools			
Middle School H	520	162	31.15%
Middle School I	420	98	23.33%
Middle School J	630	76	12.06%
TOTALS	1570	336	21.40%
High Schools			
High School K	460	97	21.09%
High School L	870	90	10.34%
TOTALS	1330	187	14.06%

Once all calculations are made, eligible attendance areas can be determined.

Exhibit 2: Rank the attendance areas (schools) from highest to lowest percentage of poverty children within each grade span. All attendance areas (schools) with 35-percent or greater poverty or which are above the LEA average for the grade span may be served.

Schools A, B, and C qualify in the elementary grade-span grouping because School A is above the 35-percent poverty and Schools B and C are above the LEA average of 25.29-percent for elementary schools. Please note the 125-percent rule would apply if the LEA elects to serve schools below 35-percent poverty.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Schools H and I qualify in the middle school grade-span grouping because each area is above the LEA average of 21.40-percent for middle schools.

School K qualifies in the high school grade-span grouping because it is above the LEA average of 14.06 percent for high schools.

Although not depicted in the exhibits, attendance areas (schools) with 75-percent or greater poverty must be served in rank order regardless of the grade span.

If an LEA uses feeder patterns to qualify schools as eligible for Title I services, worksheets and supporting documentation should be attached to the consolidated application in the attachment area. Memos should be on file in the Department. A feeder pattern is defined as a group of schools that all feed into one high school.

LEAs should maintain all documentation used to determine eligible attendance areas. Worksheets and supporting documentation must be available to auditors upon request.

If an LEA decides to serve schools below a 35% poverty threshold with Title I, Part A funds, the LEA must allocate funds to all other schools using the 125% rule. This regulation requires all schools being served must be allocated at a PPA that reflects a minimum of 125% of the districts average PPA for all students. (See the 125-percent Rule.)

Please visit the U.S. Department of Education's (US ED) Web site to view this section of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA) at:
<http://www.ed.gov/policy/elsec/leg/esea02/pg2.html#sec1113>

Healthy, Hunger-Free Kids Act of 2010 (Act)

With the passage of the Healthy, Hunger-Free Kids Act of 2010 (Act), the National School Lunch Program now includes a universal meal program, the Community Eligibility Provision (CEP), which is being phased in over several years by the U.S. Department of Agriculture (USDA). The CEP permits eligible schools to provide meal service to all students at no charge, regardless of economic status. As such, the CEP affects implementation of certain requirements of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA). This information will provide guidance with respect to identifying economically disadvantaged students in CEP schools in implementing Title I requirements.

Background

Implementation of the CEP began in the 2011–2012 school year in the local educational agencies (LEAs) in Illinois, Kentucky, and Michigan. For the 2012–2013 school year, the USDA selected the District of Columbia, New York, Ohio, and West Virginia. Georgia was one of four states selected for implementation for the 2013–2014 school year. The option became available to all LEAs throughout the country in the 2014–2015 school year.

CEP schools use only direct certification data, such as data from the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) program to determine the federal cash reimbursement provided by USDA. They will not rely on annual free

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

or reduced meal (FRM) applications that are generally used to determine eligibility for Title I, Part A school allocations. A school is eligible for CEP if at least 40-percent of its students are certified for free meals through means other than FRM applications (for example, students directly certified through SNAP). To account for low-income families not reflected in the direct certification data, USDA will set meal reimbursement levels for CEP schools by multiplying the percentage of students identified through the direct certification data by a multiplier established in the Act (currently, the multiplier is 1.6). Under the CEP, schools must conduct direct certification once every four years. Schools, however, are encouraged to conduct direct certification on a yearly basis. If the most current data show an increase in the percentage of enrolled students who are directly certified, the school may use that percentage to determine USDA reimbursement; if the data show a decrease, the school may continue to use the original percentage.

With respect to Title I, there are several aspects of the program for which student-level poverty data are needed and that, therefore, are affected by the CEP. Under Section 1113 of the ESEA, an LEA must rank its schools based on the percentage of economically disadvantaged students in each school to determine a school's eligibility to receive Title I funds and to allocate funds to selected schools. In terms of accountability, each state and LEA that receives funding under Title I must assess and report annually on the extent to which students are making progress toward meeting state academic achievement standards in reading or language arts and in mathematics. In particular, each state and LEA must measure and report publicly on the progress of all students and of students in various subgroups, including students who are economically disadvantaged. Moreover, an LEA must hold schools accountable for the achievement of subgroups, whether under Section 1116 of the ESEA or under ESEA flexibility for those states with an approved ESEA flexibility request. To meet these requirements, an LEA must have school-level data on individual, economically disadvantaged students. For many LEAs, information from the National School Lunch Program is likely to be the best source of data available to identify those students.

Guidance for Meeting Title I Requirements

Using school lunch data in schools implementing CEP presents issues with respect to several Title I requirements, because schools provide lunch at no charge to all students and, as noted earlier, may use the same direct-certification percentage for up to four years. Additionally, CEP schools determine their poverty percentage based on data from students certified through means other than FRM applications (i.e., direct certification data), whereas other schools in an LEA may use FRM applications or a combination of FRM applications and direct certification. The following guidance presents information on how to identify the economically disadvantaged students in a CEP school for accountability purposes and for ranking schools for Title I allocation purposes.

For purposes of disaggregating assessment data by the economically disadvantaged subgroup for reporting and accountability, school officials would deem all students in a CEP school as economically disadvantaged. Accordingly, the economically disadvantaged subgroup in a CEP school would be the same as the all-students group. Similarly, all students in a CEP school would be eligible for any services for which eligibility is based on poverty.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

When annually determining the eligibility of a CEP school to receive Title I funds, an LEA must assume that the percentage of economically disadvantaged students in the school is proportionate to the percentage of meals for which that CEP school is reimbursed by the USDA for the same school year.¹ Thus, to calculate this percentage, the LEA should multiply the number of students identified by the direct certification data by the statutory multiplier (currently 1.6) specified in the Act and divide by the enrollment in the school.

When allocating Title I funds to a school when it has CEP and non-CEP schools, an LEA must use a common poverty metric to rank order its schools and allocate Title I 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 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 I 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).

The following pages provide examples of each of these approaches. Example A shows how the first approach would work, using the 1.6 multiplier for CEP schools, for a hypothetical LEA with \$1,000,000 to distribute to its Title I schools, which consist of three CEP schools and three non-CEP schools. Example B illustrates the second approach, using direct certification data from SNAP for all schools in an LEA with two CEP schools and four non-CEP schools. As detailed in the table footnotes, two schools, Harding and Coolidge, are not eligible in Example B. Using the Example B schools and the same direct certification data for each school, Example C demonstrates the third approach by applying the 1.6 multiplier to the direct certification data for all schools. In this example, as detailed in the table footnotes, Harding is now eligible for Title I.

¹ Because schools may conduct direct certification yearly, if data show an increase in the percentage of enrolled students eligible for direct certification, and the school therefore receives a higher level of reimbursement from the USDA, then the figures used for Title I purposes would be adjusted accordingly.

**Implementing Title I in Georgia Schools
FY18 Handbook for Title I Directors**

Example A

**Within-District Title I Allocations in an LEA with a
Combination of Community Eligibility Schools and Non-Community Eligibility 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 ¹	Non-Community Eligibility Schools: Economically Disadvantaged Students Identified by Free and Reduced-Price Meals Data	1.6 Multiplier ²	NSLP Count Used to Allocate Title I Funds ³	Percentage of Economically Disadvantaged Students for Title I Allocations ⁴	Per-Pupil Amount Used by LEA	Title I Allocation ⁵
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
Total	N/A	2,875	N/A	N/A	N/A	2,160	75%	N/A	\$1,000,000

¹ 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.

² The 1.6 multiplier applies only to a Community Eligibility school.

³ 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.

⁴ Column 7 / Column 3.

⁵ Column 9 x Column 7 (Note: Monroe is ineligible for Title I funds because its poverty percentage is below both the LEA's average and 35 percent.)

**Implementing Title I in Georgia Schools
FY18 Handbook for Title I Directors**

Example B

Using Direct Certification Data Only

Within-District Title I 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 SNAP¹	Percentage of Economically Disadvantaged Students for Title I Allocations²	Per-Pupil Amount Used by LEA	Title I Allocation³
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
Total	N/A	4,215	2,110	50%	N/A	\$1,000,000

¹ The figures in Column 4 exclude, for the purposes of Title I 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.)

² Column 4 / Column 3.

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

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Example C

Using Direct Certification Data and the 1.6 Multiplier in All Schools Within-District Title I 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 ¹	1.6 Multiplier	Poverty Count Used to Allocate Title I Funds ²	Percentage of Economically Disadvantaged Students for Title I Allocations ³	Per-Pupil Amount Used by LEA	Title I Allocation 5
McKinley	Y	750	500	1.6	750	100%	\$333.004	\$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
Total	N/A	4,215	2,110	N/A	3,326	79%	N/A	\$1,000,000

¹ The figures in Column 4 exclude, for the purposes of Title I 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.)

² 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.

³ Column 6 / Column 3.

⁴ If the application of the 1.6 multiplier results in more than one school at 100 percent poverty, an LEA may allocate a higher per-pupil amount to the school with the larger percentage of directly certified students.

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

Charter Schools and Title I, Part A

The legislative enactment of charter schools predates the most recent reauthorization of the Elementary and Secondary Education Act of 1965 (ESEA) by ten years; however, charter school laws, as reauthorized through the 1990s, parallel and align with the goals of ESEA. Both the state education agency (SEA) and charter schools focus on doing what works, supporting and expanding parental options, encouraging local control, and requiring results-oriented accountability.

Local educational agencies (LEAs) must provide services/resources to a charter school which qualifies for Title I services/resources. A representative from each charter school should be included in planning discussions with the LEA to maximize the impact of federal funding. Because poverty is an important aspect in allocating Title I funding, 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 that choose not to

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

participate in the SNP, an alternative method to verify and validate poverty will be provided by the SEA. At this time, direct certification figures currently enrolled at the charter LEA are used to determine allocation of Federal Funds.

LEA charter schools that accept Title I funds must submit (as all schools receiving Title I funds) a 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 and maintain the plan and any documentation of the planning process as well as any documentation needed for audit purposes.

A number of state charter schools have been approved by the Georgia State Board of Education (SBOE) rather than an LEA. These charters must develop a Comprehensive LEA Implementation Plan (CLIP) and a separate plan for use of Title I funds and submit a consolidated application, as must all LEAs, to the state educational agency (SEA) Title Programs Division. Charter schools that are their own LEAs should expect to meet the same requirements and responsibilities of other traditional LEAs.

In most cases, the charter schools must apply for the federal grants through their LEA. Specific federal programs for which charter schools might apply include:

- Title I, Part A – 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 B – 21st Century Community Learning Centers
- Title VI, Part B – Rural Education Achievement Programs (REAP)

The Charter School Expansion Act requires the LEA to provide notice to the charter schools regarding the federal funds for which they may be eligible. Technical assistance will be provided by the Title I Education Program Specialist and/or the SEA Title I and/or charter schools' offices.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Allocation of Federal Formula Funds to Charter Schools—Within State Allocations

The U.S. Department of Education (US ED) calculates Title I 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. US ED determines the eligibility of each LEA for Basic, Concentration, Targeted, and Education Finance Incentive Grants (EFIG) and calculates allocations (ED-determined LEA allocations) using the number of formula children ages 5 through 17 years counted under Section 1124(c) of the Elementary and Secondary Education Act of 1965, as amended (ESEA). Formula children consist of the census LEA poverty estimates and annually collected counts of children ages 5 through 17 years (1) in families above 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.

US ED's list of LEAs, however, does not match the current universe of LEAs for many states. Consequently, a state educational agency (SEA) must adjust US ED's Title I allocations to account for, among other things, LEA boundary changes and eligible LEAs, such as charter schools, that are not included on US 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 US ED-determined LEA allocations. In addition, US ED has issued guidance that elaborates on the regulations by providing examples of how SEAs adjust their Title I allocations to account for the existence of eligible LEAs that were not included in the US ED-determined LEA allocations (available at: <http://www2.ed.gov/programs/titleiparta/seaguidanceforadjustingallocations.doc>).

In the case of an LEA (state charter/commissioned) 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 I 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 Department calculates the Title I, Part A allocation for state/commissioned charter schools using direct certified data that is equated to free or reduced-price meal (FRM) data based on data provided by the LEA that indicates the students who would have qualified for the school lunch program and the sending LEAs in which they reside. 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 Grants (EFIG) formulas of the Title I, Part A allocation.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

US ED has provided the Department guidance on calculating the Title I, Part A allocations for those state charter schools that do not operate school food nutrition programs. The Department may use direct certified (TANF/SNAP) data for state charters that do not operate school food nutrition programs to derive FRM data and continue to use free or reduced-price meal data for state charters that operate school nutrition programs to derive a census poverty count for all state charters.

- To ensure that the alternative poverty data source used to derive the census poverty count is the same across all state charters, the Department would first need to use direct certified (TANF/SNAP) poverty data to derive FRM data for those state charters that do not operate school food nutrition programs:
 - the number of direct certified (TANF/SNAP) students in the state charter that does not operate a school nutrition program
 - divided by the number of direct certified (TANF/SNAP) students residing in geographical area of sending LEA(s)
 - multiplied by the number of FRM students residing in geographical area of sending LEA(s)
 - equals the derived school FRM count for the state charter that does not operate a school nutrition program
- The Department would next use FRM data (including the derived FRM data for the state charter that does not operate a school nutrition program) as the alternative source to derive the census poverty count for all state charters.
- After deriving the census poverty count, the Department would then follow the remainder of the guidance to determine eligibility for the state charters and sending LEAs under each Title I formula and the amount of their final allocations.

Federal Formula Allocation During First Year and for Successive Enrollment Expansions

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 charter schools that are new or significantly expanding their enrollment receive the full amount of federal funds to which they are entitled within five months of the opening or significant expansion.

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 state educational agency (SEA) or local educational agency (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

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

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 SBOE also requires 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 the U.S. Department of Education (US ED) in December 2000 as “information the charter school reasonably needs to know to make an informed decision about whether to apply to participate in a particular covered program and the steps that the charter school needs to do so.”
- 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.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

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
After November 1 but before February 1	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.
After February 1	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

Resources:

- Please visit the US ED’s Web site for *The Impact of the New Title I Requirements on Charter Schools Non-Regulatory Guidance* at:
<http://www2.ed.gov/programs/titleiparta/legislation.html>
- Further information on the Charter School program can be found at:
<http://www.ed.gov/programs/statecharter/legislation.html>

Comparability of Services

Introduction

To ensure that funds made available under Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA) are used to provide services that are in addition to the regular services normally provided by a local educational agency (LEA) for participating children, the LEA must provide services in its Title I schools with state and local funds that are at least comparable to services provided in its non-Title I schools. This requirement is critical to the success of Title I, Part A 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 I 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 I schools when

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

distributing resources funded from state and local sources simply because these schools receive federal funds.

The Georgia Department of Education (Department) requires each school district to demonstrate comparability on an annual basis. The Department 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 Department 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 I Area 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 Area 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 1120A(c) of the Elementary and Secondary Education Act of 1965 (ESEA) provides that an LEA may receive Title I, Part A funds only if it uses state and local funds to provide services in Title I schools that, as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds. If the LEA serves all of its schools with Title I funds, the LEA must use state and local funds to provide services that, as a whole, are substantially comparable in each Title I 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. An LEA may also exclude schools with 100 or fewer students from its comparability determinations.

Demonstrating comparability is a prerequisite for receiving Title I, Part A funds. Because Title I, Part A allocations are made annually, comparability is an **annual** requirement.

Criteria for Meeting Comparability

There are a number of ways that an LEA may meet the comparability requirement. The Georgia Department of Education (Department) 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 I Education Program Specialist serving the LEA.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

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 I school with the average number of students per instructional staff in non-Title I schools, an LEA may consider a Title I school comparable if its average does not exceed 110-percent of the average of non-Title I schools. The LEA may choose to compare large Title I schools in a particular grade span to large non-Title I schools in that grade span and small Title I schools in that grade span to small non-Title I schools in that grade span. The LEA may also compare high-poverty Title I schools to low-poverty Title I schools.

Alternately, if all schools in the district are Title I schools, an 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 90 to 110-percent 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 90 to 110-percent 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 I to large non-Title I schools and small Title I to small non-Title I 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 I 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.

Title I provides that an LEA need not 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

An LEA must develop procedures for complying with the comparability requirements and implement those procedures annually. These procedures should be in writing and, at a minimum, should include the LEA's timeline for demonstrating comparability, identification of the office responsible for making comparability calculations, the measure and process used to determine whether schools are comparable, and how and when the LEA makes adjustments in schools that are not comparable. LEAs in Georgia are required to document compliance with the comparability requirement by performing the necessary calculations every year to demonstrate that all of its Title I schools are comparable and make adjustments if any are not. Records of information needed to demonstrate comparability must be maintained by the LEA and compliance documents must be submitted to the Department.

An LEA may determine comparability of each of its Title I 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 fewer than 100 students.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Although there is no limitation on the number of grade spans an LEA may use, the number should match the basic organization of schools in the LEA. For example, if the LEA's organization includes elementary, middle, and high schools, the LEA would have three grade spans for comparability purposes.

Compliance Timeline

- An LEA must be comparable by July 1 of each fiscal year. [However, in Georgia LEAs have until December 31st to make any adjustments to the online comparability application. This is accomplished by providing corrections to information provided through the Certified Classified Personnel Information (CPI) report with supporting documentation to the LEA's Title I Education Program Specialist who will then correct the errors. Or an LEA may move or hire staff to meet comparability.]
- An LEA should collect the necessary data to demonstrate comparability as of the October full-time equivalent (FTE) count day.
- The Title I Comparability Report may be submitted annually via the online comparability application to the Department as early as December 10th.
- 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 the Department demonstrating that, as of a date no later than December 31st of that school year, comparability has been met.
- If the LEA does not achieve comparability by December 31st, the LEA is in violation of the Title I comparability requirements and will be subject to withholding or repayment of 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 I and non-Title I 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 may 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 non-instructional paraprofessionals.

The activities authorized by the ESEA include activities that are authorized by Title VIII of the 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

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

no accountability to the federal government is required, and staff that is paid with Impact Aid funds is included in comparability determinations.

Grouping of Schools for Comparability Comparison

LEA Organization

The listing of school attendance areas and grade-span groups must coincide with the listing of school or attendance areas in the Title I section of Georgia’s LEA consolidated application. **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 three 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.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

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 school 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

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

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 percent of low-income.*

The small group would be:

School or Attendance Area	Enrollment	Percentage of Low-Income
A	210	63.87
D	125	39.82

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 I-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-percent 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 I 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, or schools or attendance areas A, B, C and D may be compared to school or attendance area E.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Examples of Ways to Meet the Comparability Requirement

The six examples that follow illustrate how an LEA may use student/instructional staff ratios to determine whether Title I and non-Title I schools meet the comparability requirement. In Example 1, the LEA compares each Title I school with the average of its non-Title I 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 I schools, bases the comparisons on grade spans. In Example 4, all of the schools in the LEA are Title I schools, and the LEA makes separate comparisons for its large schools and small schools. In Example 5, in which all schools are Title I schools, the LEA divides its schools between high-poverty and low-poverty schools and compares schools within each poverty band to each other. In Example 6, all of the schools are Title I schools, and the LEA establishes a limited comparison group consisting of its lowest-poverty schools and compares all of its other schools to the average calculated for the comparison group.

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

In the following example, a local educational agency (LEA) provides Title I services to seven of its 11 elementary schools. (The district serves only elementary schools.) The LEA demonstrates comparability by annually comparing student/instructional staff ratios for each of its Title I schools to the average student/instructional staff ratios for its non-Title I schools. In this example, each of the Title I schools is comparable because the student/instructional staff ratio does not exceed 14.1 (the ratio for all non-Title I schools).

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Title I Elementary Schools					
Beaufort Elementary	K-5	528	70.2	7.5	Yes
Broad River Elementary	K-5	510	49.4	10.3	Yes
Davis Elementary	K-5	417	38.7	10.8	Yes
Shanklin Elementary	K-5	726	59.0	12.3	Yes
Port Royal Elementary	K-5	189	16.0	11.8	Yes
St. Helena Elementary	K-5	808	58.0	13.9	Yes
Shell Point Elementary	K-5	673	60.0	11.2	Yes
Non-Title I Elementary Schools					
Hilton Head	K-5	1,764	114.5	15.4	
Lady's Island	K-5	757	70.0	10.8	
MC Riley	K-5	1,005	88.0	11.4	
Mossy Oaks	K-5	484	42.0	11.5	
TOTAL		4,010	314.5	12.8	
110-percent of Student/FTE ratio for non-Title I schools*				14.1	

*To be comparable, the student/instructional staff ratio for each Title I elementary school may not exceed 14.1 (12.8 x 1.1).

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

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

In this example, a local educational agency (LEA) serves 12 of its 21 elementary schools (only elementary schools are served). In addition to comparing the student/instructional staff ratios for Title I and non-Title I 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?
Large Title I Elementary Schools					
Barnard-Brown	K-6	483	34.4	14.0	Yes
RJ Kinsella Community	K-6	456	40.7	11.2	Yes
Thirman Milner	K-6	582	43.1	13.5	Yes
Dominick Burns	K-6	634	48.5	13.1	Yes
Henry Dwight	K-6	564	41.1	13.7	Yes
Maria Sanchez	K-6	577	42.7	13.5	Yes
West	K-6	691	56.6	12.2	Yes
Parkville Community	K-6	620	45.7	13.6	Yes
Large Non-Title I Elementary Schools					
ML King Jr.	K-6	775	54.6	14.2	
Moylan	K-6	509	41.3	12.3	
TJ McDonnough	K-6	544	39.3	13.8	
MD Fox	K-6	899	65.4	13.7	
Annie Fischer	K-6	608	49.4	12.3	
TOTAL		3,335	250.0	13.3	
110-percent of Student/FTE ratio for non-Title I schools*				14.6	

*To be comparable, the student/instructional staff ratio for each large Title I elementary school may not exceed 14.6 (13.3 x 1.1).

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/Instructional Staff Ratio	Comparable?
Small Title I Elementary Schools					
Fred Wish	K-6	417	36.7	11.4	Yes
John Clark	K-6	425	32.6	13.0	Yes
Ramon Betances	K-6	436	34.3	12.7	Yes
Mary Hooker	K-6	307	27.8	11.0	Yes
Small Non-Title I Elementary Schools					
Sand Everywhere	K-6	346	26.4	13.1	
Simpson-Waverly	K-6	325	27.7	11.7	
Mark Twain	K-6	359	29.8	12.0	
Sarah Rawson	K-6	297	27.3	10.9	
TOTAL		1,327	111.2	11.9	
110-percent of Student/FTE ratio for non-Title I schools*				13.1	

*To be comparable, the student/instructional staff ratio for each small Title I elementary school may not exceed 13.1 (11.9 x 1.1).

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

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

In the following example, all of the schools in the district are Title I schools. To demonstrate comparability, the local educational agency (LEA) computes the average student/instructional staff ratio for all its schools and determines whether the student/instructional staff ratio for each school falls within a range that is within 90- to 110-percent of the average for all schools. In its first comparability calculation, the LEA compares all of its 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 90- to 110- percent 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?
School District as a Whole					
Davis School	K-5	371	25.6	14.5	Yes
Devers School	K-5	483	33.2	14.5	Yes
Edgar Fahs Smith MS	6-8	818	50.0	16.4	Yes
Ferguson School	K-5	484	31.0	15.6	Yes
Goode School	K-5	682	42.4	16.1	Yes
Hannah Penn MS	6-8	1,174	64.0	18.3	No
Jackson School	K-5	423	30.0	14.1	No
McKinley School	K-5	482	29.8	16.2	Yes
William Penn HS	9-12	1,737	110.0	15.8	Yes
TOTAL		6,654	416.0	16.0	
90-percent of student/instructional staff ratio*				14.4	
110-percent of student/instructional staff ratio*				17.6	

*Each school is comparable if the student/instructional staff ratio falls within 14.4 (16.0 x 0.9) to 17.6 (16.0 x 1.1).

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Elementary Schools					
Davis School	K-5	371	25.6	14.5	Yes
Devers School	K-5	483	33.2	14.5	Yes
Ferguson School	K-5	484	31.0	15.6	Yes
Goode School	K-5	682	42.4	16.1	Yes
Jackson School	K-5	423	30.0	14.1	Yes
McKinley School	K-5	482	29.8	16.2	Yes
TOTAL		2,925	192.0	15.2	
90-percent of student/instructional staff ratio*				13.7	
110-percent of student/instructional staff ratio*				16.7	

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

*Each elementary school is comparable if the student/instructional staff ratio falls within 13.7 (15.2 x 0.9) to 16.7 (15.2 x 1.1).

EXAMPLE 3 *(continued)*

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Middle Schools					
Edgar Fahs Smith MS	6–8	818	50.0	16.4	Yes
Hannah Penn MS	6–8	1,174	64.0	18.3	Yes
Total		1,992	114.0	17.5	
90-percent of student/instructional staff ratio*				15.8	
110-percent of student/instructional staff ratio*				19.3	

*The middle schools are comparable if the student/instructional staff ratio for each school falls within 15.8 (17.5 x 0.9 to 19.3 (17.5 x 1.1).

Note that because there is only one high school in the district, the LEA does not need to determine comparability for that school.

EXAMPLE 4 (All elementary schools in the local educational agency (LEA) are Title I schools, and large and small schools are compared.)

In this example, all of the elementary schools in the LEA are Title I schools and the comparability determination is based on student/instructional staff ratios. Again, because all of the schools are Title I schools, the district demonstrates comparability by determining whether the student/instructional staff ratio for each school falls within a range that is between 90- and 110-percent of the average for all schools. In the first set of calculations, which is based on all schools, two schools are not comparable. When the LEA refines the comparison to compare small schools (those with less than 420 students) with each other and large schools (420 or more students), the student/instructional staff ratio for each school falls within 90- to 110-percent 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?
All Elementary Schools					
Burrowes School	K–5	430	29.3	14.7	Yes
Carter MaCrae Elementary	K–5	565	40.6	13.9	No
Elizabeth R. Martin Elementary	K–5	269	17.6	15.3	Yes
Fulton Elementary	K–5	470	29.0	16.2	Yes
George Washington Elementary	K–5	641	45.0	14.2	Yes
Hamilton Elementary	K–5	390	22.5	17.3	No
James Buchanan Elementary	K–5	390	26.0	15.0	Yes
King Elementary	K–5	601	36.0	16.7	Yes
Lafayette Elementary	K–5	420	26.0	16.2	Yes

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Price Elementary	K-5	477	28.5	16.7	Yes
Ross Elementary	K-5	339	20.0	17.0	Yes
Thomas Wharton Elementary	K-5	245	16.3	15.0	Yes
Wickersham Elementary	K-5	503	31.5	16.0	Yes
TOTAL		5,740	368.3	15.6	
90-percent of student/instructional staff ratio*				14.0	
110-percent of student/instructional staff ratio*				17.2	

*The elementary schools would be comparable if the student/instructional staff ratio falls within 14.0 (15.6 x 0.9) to 17.2 (15.6 x 1.1).

EXAMPLE 4 (continued)

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Large Elementary Schools					
Burrowes School	K-5	430	29.3	14.7	Yes
Carter MaCrae Elementary	K-5	565	40.6	13.9	Yes
Fulton Elementary	K-5	470	29.0	16.2	Yes
George Washington Elementary	K-5	641	45.0	14.2	Yes
King Elementary	K-5	601	36.0	16.7	Yes
Lafayette Elementary	K-5	420	26.0	16.2	Yes
Price Elementary	K-5	477	28.5	16.7	Yes
Wickersham Elementary	K-5	503	31.5	16.0	Yes
Total		4,107	266.9	15.4	
90-percent of student/instructional staff ratio*				13.9	
110-percent of student/instructional staff ratio*				16.9	

*The large elementary schools would be comparable if the student/instructional staff ratio falls within 13.9 (15.4 x 0.9) to 16.9 (15.4 x 1.1).

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable?
Small Elementary Schools					
Elizabeth R. Martin Elementary	K-5	269	17.6	15.3	Yes
Hamilton Elementary	K-5	390	22.5	17.3	Yes
James Buchanan Elementary	K-5	390	26.0	15.0	Yes
Ross Elementary	K-5	339	20.0	17.0	Yes
Thomas Wharton Elementary	K-5	245	16.3	15.0	Yes
Total		1,633	102.4	15.9	
90-percent of student/instructional staff ratio*				14.4	
110-percent of student/instructional staff ratio*				17.5	

*The small elementary schools would be comparable if the student/instructional staff ratio falls within 14.4 (15.9 x 0.9) to 17.5 (15.9 x 1.1).

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

EXAMPLE 5

All elementary schools in the local educational agency (LEA) are Title I schools; high-poverty schools are compared to high-poverty schools, and low-poverty schools are compared to 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-percent.

In this example, all of the elementary schools in the LEA are Title I schools and the comparability determination is based on student/instructional staff ratios. The LEA demonstrates comparability by determining whether the student/instructional staff ratio for each school falls within a range that is within 90- to 110-percent of the average for all schools. In the first set of calculations, which is based on all schools, one school is not comparable. The LEA refines the comparison so that it compares (1) the student/instructional staff ratio of each of its high-poverty schools (those with a poverty rate greater than or equal to 60-percent) with the average for all of its high-poverty schools and (2) the student/instructional staff ratio in each of its low-poverty schools (those with poverty rates below 60-percent) to the average ratio for its low-poverty schools. When the LEA compares the student/instructional staff ratio for each of its high-poverty schools to the average for all of its high-poverty schools, the ratio for each school falls within 90- to 110-percent of the high-poverty schools' average, and each school is, therefore, comparable. Similarly, when the LEA compares the student/instructional staff ratio for each of the LEA's low-poverty schools, the ratio for each of the low-poverty school falls within the 90- to 110-percent of the average ratio for its low-poverty schools, and each school is, therefore, comparable.

*Each school is comparable if the student instructional staff ratio falls within 13.9 (15.4 x 0.9) to 16.9 (15.4 x 1.1).

EXAMPLE 5 (continued)

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Free/Reduced Lunch No. of Children	Percent of Poor	Comparable?
High-Poverty Title I Schools							
Violet Hill	K-5	560	36.0	15.6	542	97%	Yes
Oakdale	K-5	470	29.0	16.2	425	90%	Yes
Elmwood	K-5	641	45.0	14.2	539	84%	Yes
Hobson	K-5	477	28.5	16.7	385	81%	Yes
Berlieth	K-5	562	40.6	13.8	435	77%	Yes
Davis	K-5	420	26.0	16.2	322	77%	Yes
Indian Rock	K-5	425	29.3	14.5	316	73%	Yes
Roosevelt	K-5	339	21.0	16.1	249	73%	Yes
Park	K-5	503	31.5	16.0	354	70%	Yes
Camp Springs	K-5	355	22.5	15.8	252	66%	Yes
White Hill	K-5	245	16.3	15.0	148	60%	Yes
Total		4,997	325.7	15.3			
90-percent of student/instructional staff ratio*				13.8			
110-percent of student/instructional staff ratio*				16.8			

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

*Each high-poverty school is comparable if the student instructional staff ratio falls within 13.8 (15.3 x 0.9) to 16.8 (15.3 x 1.1).

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Free/Reduced Lunch No. of Children	Percent of Poor	Comparable?
Low-Poverty Title I Schools							
Bannaker	K-5	400	26.0	15.4	161	40%	Yes
Eastern	K-5	273	17.6	15.5	112	41%	Yes
Total		673	43.6	15.4			
90-percent of student/instructional staff ratio*				13.9			
110-percent of student/instructional staff ratio*				16.9			

*Each low-poverty elementary school is comparable if the student/instructional staff ratio falls within 13.9 (15.4 x 0.9) to 16.9 (15.4 x 1.1).

EXAMPLE 6

All elementary schools in the local educational agency (LEA) are Title I 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-percent.

In this example, the LEA bases its comparability determinations on student/instructional staff ratios. All elementary schools in the LEA are Title I schools and the LEA compares its 12 highest-poverty schools to the two schools with the lowest-poverty rates. The schools would be considered substantially comparable if the student/instructional staff ratio in each of the LEA's 12 highest-poverty schools does not exceed 110-percent 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. of Children	Percent of Poor	Comparable?
High-Poverty Title I Schools*							
Sheppard	K-5	373	26.5	14.1	356	95%	Yes
Hunter	K-5	362	26.4	13.7	326	90%	Yes
Ludlow	K-5	313	24.6	12.7	265	85%	Yes
Washington	K-5	319	25.0	12.8	261	82%	Yes
Mifflin	K-5	254	24.6	10.3	202	80%	Yes
Kinsey	K-5	371	24.4	15.2	293	79%	Yes
Dunbar	K-5	234	21.2	11.0	167	71%	Yes
Sharswood	K-5	360	26.4	13.6	255	71%	Yes
Jackson	K-5	330	27.0	12.2	232	70%	Yes
McCloskey	K-5	346	25.0	13.8	209	60%	Yes
Lingelbach	K-5	328	26.4	12.4	204	62%	Yes
Dobson	K-6	266	21.4	12.4	160	60%	Yes
Low-Poverty Title I Schools							

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Crossan	K-5	310	23.6	13.1	148	48%	
Penn Alexander	K-6	376	25.7	14.6	171	45%	
Total		686	49.3	13.9			
110-percent of student/instructional staff ratio*				15.3			

*The services to schools in the LEA would be considered substantially comparable if the student/instructional staff ratio in each high-poverty school does not exceed 15.3 (13.9 x 1.1).

The LEA Comparability Report will be submitted to the Georgia Department of Education via the Web based Title I, Part A comparability application.

To document comparability, LEAs may also use the Title I Comparability Report spreadsheet located under Worksheets on the Title I Web site at:

<http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Title-I-Worksheets.aspx>

Meeting Comparability through the Resource Allocation Process

A district may choose to use the districtwide resource allocation plan process to meet the comparability requirement. This process involves the approval of the district's resource allocation plan by the Georgia Department of Education Title Programs Division.

A districtwide resource allocation plan is based on student characteristics such as poverty, limited English proficiency, or disability, etc. as is allowed through the section 1120A(c) of the Elementary and Secondary Education Act of 1965 (ESEA) which provides that an LEA may receive Title I, Part A funds only if it uses state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds.

The district has an obligation to provide documentation that all of the resources available to the district are provided in an equitable manner to all of the schools in the district.

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 makes adjustments in schools that are not comparable
- is an officially approved districtwide resource allocation plan.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Additional Resources:

Non-Regulatory Guidance – Title I Fiscal Issues: Maintenance of Effort, Comparability, Supplement Not Supplant, Carryover, Consolidating Funds in Schoolwide Programs, Grantback Requirements located at: <http://www.ed.gov/about/offices/list/oese/legislation.html> (search *Title I fiscal issues*)

Schoolwide Programs Definition and Details

The purpose of schoolwide Title I programs 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. A school is eligible to be a schoolwide program:

- If the local educational agency (LEA) determines that the school serves an eligible attendance area.¹
- If, for the first year of the schoolwide program, the school serves a school attendance area in which not less than 40-percent of the students enrolled in the school are from low-income families.
- If the school consults with stakeholders and makes the decision to become schoolwide.

Using Title I Schoolwide Programs to Support School Reform

A Title I schoolwide program is a comprehensive reform strategy designed to upgrade the entire educational program in a Title I school with a poverty percentage of 40 percent or more in order to improve the achievement of the lowest-achieving students (ESEA section 1114(a)(1)).

- Any Title I school with 40 percent or more of its students living in poverty, regardless of the grades it serves, may operate a schoolwide program.
- An SEA may request a waiver for certain schools to operate a schoolwide program without meeting the 40 percent poverty threshold through a specific request via the Title I, Part Program Manager Office.

¹ Refer to Eligible School Attendance Areas

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Benefiting from 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)).
- Consolidating Federal, State, and local funds. A school operating a schoolwide program may consolidate Federal, State, and local funds to better address the needs of students in the school (ESEA section 1114(a)(1)(A)).

Implementing a Schoolwide Program

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

- Conducting a **comprehensive needs assessment** of the entire school, using academic achievement data and perception data from school staff, parents, and others in the community. Using a systematic method, such as root-cause analysis, the comprehensive needs assessment should identify the major problem areas that the school needs to address. The comprehensive needs assessment should take 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 LEA.
- Preparing a **comprehensive schoolwide plan** that describes how the school will improve academic achievement throughout the school, but particularly for the lowest-achieving students, by addressing the major problem areas identified in the comprehensive needs assessment. **This plan may be integrated into an existing improvement plan.** The schoolwide plan 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

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

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.

- **Annually reviewing the schoolwide plan**, using data from the State's assessments, other indicators of academic achievement, and perception data to determine if the schoolwide program has been effective in addressing the major problem areas and, in turn, increasing student achievement, particularly for the lowest-achieving students. The plan remains in effect for the duration of the school's participation under Title I, Schoolwide, 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.

Safeguarding the Interests of Historically Underserved Populations

Although a school may use Title I funds to serve all students in a schoolwide program, there are protections to ensure that low-achieving students and historically underserved populations of students do not get ignored.

- The very purpose of a schoolwide program is to upgrade the entire educational program of the school in order to raise the achievement of the lowest-achieving students (ESSA section 1114).
- A comprehensive schoolwide plan must include strategies that will–
 - ✓ provide opportunities for all children, including each of the subgroups of students to meet the challenging State academic standards;
 - ✓ use methods and instructional strategies that strengthen the academic program in the school, 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; and
 - ✓ 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:
 - counseling, school-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students' skills outside the academic subject areas;
 - preparation for and awareness of opportunities for postsecondary education and the workforce, which may include career and technical education programs and

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

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);

- 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.);
 - 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; and
 - strategies for assisting preschool children in the transition from early childhood education programs to local elementary school programs
- In accordance with the method of determination described in section 1118(b)(2), a school participating in a schoolwide program shall use funds available to carry out this section only to supplement the amount of funds that would, in the absence of funds under this part, be made available from non-Federal sources for the school, including funds needed to provide services that are required by law for children with disabilities and English learners
- An LEA operating a schoolwide program must comply with all other applicable requirements relating to health, safety, civil rights, student and parental participation and involvement, services to private school children, comparability of services, maintenance of effort, uses of Federal funds to supplement, not supplant non-Federal funds (in accordance with the method of determination described in section 1118(b)(2)), or the distribution of funds to State educational agencies or local educational agencies that apply to the receipt of funds from such programs.
- If a school wide program school consolidates funds from different Federal programs under this section shall not be required to maintain separate fiscal accounting records, by program, that identify the specific activities supported by those particular funds as long as the school maintains records that demonstrate that the schoolwide program, considered as a whole, addresses the intent and purposes of each of the Federal programs that were consolidated to support the schoolwide program.
- Before a schoolwide program school may consolidate Title I, Part C Migrant Education Program (MEP) funds, it must, in consultation with migrant parents, an organization representing those parents, or both, first meet the unique educational needs of migrant students that result from the effects of their migratory lifestyle, and those other needs that are necessary to permit these students to participate effectively in school. The school also must document that these needs have been met (ESSA section 1306(b)).
- Before a schoolwide program school may consolidate Title VII, Part A, Subpart 1 Indian Education Program funds, the LEA's parent committee must approve the inclusion of those funds (ESEA section 7115(c)).

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Using Federal Funds Flexibly in a Schoolwide Program

Consistent with the benefits identified above, a school operating a schoolwide program may use Title I funds for any activity that supports the needs of students in the school as identified through the comprehensive needs assessment and articulated in the schoolwide 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).

Examples of Uses of Funds in a Schoolwide Program (Based on the Needs Assessment)

- Increased learning time
- High-quality preschool or full-day kindergarten
- 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
- Family literacy programs

Existing Guidance on Schoolwide Programs

The following guidance documents contain additional information on operating schoolwide programs:

- *Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program* (Sept. 2016) (available at <https://www2.ed.gov/policy/elsec/leg/essa/essaswpguidance9192016.pdf>), (Provides information on how a schoolwide program under Title I can be beneficial to LEAs and schools as they explore how to most effectively leverage their local, State, and Federal funds to promote school reforms and raise student achievement.)
- *Title I Fiscal Issues* (Feb. 2008) (available at <http://www2.ed.gov/programs/titleiparta/fiscalgui.pdf>) (provides

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

information on how supplement not supplant operates in a school wide program and information on consolidating funds in a schoolwide program).

- *Notice Authorizing Schoolwide Programs to Consolidate Federal Education Funds and Exempting Them From Complying With Statutory or Regulatory Provisions of Those Programs*, 69 FR 40360-64 (July 2, 2004) (available at <http://www.gpo.gov/fdsys/pkg/FR-2004-07-02/pdf/04-15121.pdf>) (provides information regarding what Federal education programs may be consolidated in a schoolwide program and how a school can ensure that it meets the intent and purposes of the Federal programs included in the consolidated schoolwide program).
- *Serving Preschool Children Through Title I Part A of the Elementary and Secondary Education Act of 1965, as Amended* (Oct. 2012) (available at <http://www2.ed.gov/policy/elsec/guid/preschoolguidance2012.pdf>)

Schoolwide Programs (SWP) Tools and Resources

All resources listed below and more are provided via this link: <http://www.gadoe.org/School-Improvement/Federal-Programs/Pages/Resources.aspx>

- Local Educational Agency (LEA) Form for Initial Implementation of Schoolwide Programs. Under the **Resource** heading, select *A Resource Guide to Consolidating Funds in Georgia's Title I Schoolwide Schools*.
- Georgia Department of Education (Department) Title Programs Schoolwide Planning Timeline. Under the **Resource** heading, select *A Resource Guide to Consolidating Funds in Georgia's Title I Schoolwide Schools*.
- Schoolwide Program Checklist for Use by Local Educational Agency (LEA) Coordinator and Title I Education Program Specialist. Under the **Resource** heading, select *A Resource Guide to Consolidating Funds in Georgia's Title I Schoolwide Schools*.
- Schoolwide, Targeted Assistance and School Improvement **Plan Template** for Use by Local Educational Agency (LEA) Coordinator and schools. *Under the Resource heading, select Schoolwide, Targeted Assistance and School Improvement Plan Template.*
- Under Schoolwide Program Resources heading select *Updated Schoolwide Guidance—Supporting School Reform by Leveraging Federal Funds in A Schoolwide Program*.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Targeted-Assistance Title Programs

Targeted-Assistance Programs Definition and Description

In all schools selected to receive Title I, Part A funds under the Elementary and Secondary Education Act of 1965 (ESEA), Section 1113 (c) that are ineligible for a schoolwide program or that choose not to operate such a schoolwide program, a local educational agency (LEA) serving such schools may use funds received under this part only for programs that provide services to eligible children identified as having the greatest need for special assistance. The eligible population for services is:

- Children not older than age 21 who are entitled to a free public education through Grade 12.
- Children who are not yet at a grade level at which the LEA provides a free public education.

Eligible children are children identified by the school as failing, or most at-risk of failing, to meet the Georgia Department of Education's (Department's) challenging student academic achievement standards on the basis of **multiple, educationally related, objective criteria** established by the LEA and supplemented by the school. "Multiple" means more than one, so it would not be appropriate to base eligibility on the score from a single test. The term "educationally related" means that there must be an academic component to the criteria. The term "objective" means that the criteria must not be based on teacher judgment or other subjective means.

There must be separate 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 will result in objective rank-order lists of students by grade level/subject area to determine the priority order in which students will be served. Most often this rank-order list is completed in an Excel spreadsheet. 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. The selection criteria must be clearly identified in each school's targeted-assistance plan.

These standards above do not apply, however, to children from preschool through the second grade. These younger students must be chosen solely on the basis of the judgment of the teacher, 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 I, Part A:

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

- 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 I.
- 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 local educational agency.

Typically, districts and schools do not have sufficient resources to serve all eligible students. Consequently, they may choose to provide more intensive services to a smaller population of students by subject area and grade level. In these circumstances, the school must then determine from the pool of eligible students which children will actually participate in the Title I program based on a determination of which children have the greatest need of special academic assistance and in which subject areas, based on the rank-order lists. This selection process can be difficult, and it is recommended that school staff, in consultation with the LEA, review all the information available about the performance of eligible children, and then use their best professional judgment in making these choices. An Excel spreadsheet can assist in this rank-order process. The school has significant discretion in the factors that may be considered. For example, the school could concentrate resources on certain grades or in certain academic subjects, or it may decide that homeless or limited English-proficient students have greater needs than other eligible students. A rank-order list prioritizing students to be served must be up-to-date and on-file in the Title I office.

Title I 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 that pool of eligible students is identified, then Title I funds may be used in selecting Title I 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**, not **low income**. For example, if a child of a wealthy family attends a Title school and has difficulty in mathematics, he or she would be eligible for Title I 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.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Components of a Targeted-Assistance School Program

Each targeted-assistance school will create a plan to assist the school and local educational agency to meet its responsibility to provide for all students identified and served in the targeted-assistance program the opportunity to meet the state's challenging student academic achievement standards in subjects as determined by the state.

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 1118.
- 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 targeted-assistance school will create a written plan to address the eight required components of a targeted-assistance program listed below. Refer to Georgia Department of

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Education's (Department's) Targeted Assistance Plan checklist to assist schools in developing and evaluating their targeted-assistance plans.

1. Description of instructional strategies and programs that coordinate with and support the regular program.
 - Grades and subject areas to be served.
 - Instructional strategies to be used for non-identified Priority and Focus Schools.
 - Instructional strategies to be used with Priority and Focus Schools.
 - Scheduling models to be used.
 - Supplemental instructional activities.
2. Description of the method by which children with the greatest need are selected.
 - Pre-K–2 multiple selection criteria.
 - 3–12 multiple selection criteria.
 - Copy of multiple, educationally related, objective criteria worksheet for each subject and grade level of students being served.
3. Description of provisions made to serve all eligible children, including economically disadvantaged, disabled, migratory, EL, and homeless children as well as those who have participated in Head Start or Even Start or who received services from a Neglected or Delinquent institution during the previous two years.
4. Description of strategies used to provide professional development opportunities to teachers and other individuals as appropriate.
5. Strategies planned to increase the level of family and parental engagement based on the LEA parental involvement policy. The school-level parental involvement policy and Student-Teacher-Parent Compact should be attached to the targeted-assistance plan.
6. Procedures to be used for coordination of Title I resources with other resources to enable children served to meet the state content standards and state student performance standards.
7. Process for reviewing the progress made by participating children on an ongoing basis and the process for evaluating and revising the program as needed to provide additional assistance to enable these children to meet the state content standards and state student performance standards.
8. Procedures for annual assessment of students for meeting state and local expectations.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

The school operating as a targeted assistance program must also evaluate its plan **annually** by reviewing, on an ongoing basis, the progress of participating children. If necessary, the school must adjust its plan to provide additional assistance, such as an extended school year, before- and after-school programs, summer programs, and training for teachers on how to identify students requiring additional assistance and how to implement student achievement standards in the classroom. Written documentation of such evaluation must be on file in the district Title I office.

Requirements

- Detailed programmatic and fiscal records must be maintained to document that Title I, Part A funds are spent on activities and services for only Title I, Part A participating students, their parents, and the teachers of the identified students.
- It is the LEA's responsibility to ensure and document that Title I students are using equipment the vast majority of the time
 - Guidance: 90-10 rule – Title I students should be using the Title I equipment 90-percent of the time
 - Be sure that the non-Title I use 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 I, Part A paid personnel may assume limited duties that are assigned to similar personnel who are not paid with Title I, Part A 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 I students and enables Title I 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 comprehensive needs assessment 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 I, Part A funds may be used to provide these services, including:

- Provision of basic medical equipment, such as eyeglasses and hearing aids.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

- Compensation of a coordinator.
- Professional development necessary to assist teachers, pupil services personnel, other staff, and parents in identifying and meeting the comprehensive needs of eligible children. Please note that professional development opportunities in Targeted Assistance school only apply to those teachers and staff directly working with eligible students and their parents.

Professional Development

- Each school receiving funds under this part for any fiscal year will devote sufficient resources to effectively carry out professional development activities for such fiscal year.
- A school may enter into a consortium with other school(s) to carry out such activities.

Existing Targeted-Assistance Programs

Each local educational agency (LEA) with Title I targeted-assistance programs must have the schools develop, amend, and annually update their targeted-assistance plans. 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 consolidated application assures that all requirements for developing or updating targeted-assistance plans have been met.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Title I Committee of Practitioners (COP)

The Georgia Title I Committee of Practitioners (COP) as Established under Section 1903 of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA)

State administration of the Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA) 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 I prior to their publication.

Committee members are provided with an update on national education reform activities, changes in Title I legislation and regulations, and other pertinent state and federal information.

Presently, the 30-member COP includes representatives from local educational agencies (LEA) administrators; teachers, including vocational educators; parents; members of local boards of education; representatives of private school children; representatives of charter schools; representative 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 I Program Manager(s), the Federal Programs Director, the Associate Superintendent of the Federal Programs Division, the COP chairperson, and membership. Documentation of all meetings, agendas, and other pertinent data are maintained at the Georgia Department of Education (Department).

Title I Committee of Practitioners Guidelines

Membership

Section 1903 of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA) as amended by the Every Student Succeeds Act (ESSA) requires representatives from the following categories:

- Local school districts (majority of members)

- Administrators, including the administrators of federal programs and LEA homeless liaisons

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

- Teachers, including vocational educators
- Parents
- Local school board members
- Private schools
- Pupil services personnel
- The Georgia Department of Education Title Programs
- The Georgia Department of Education School Improvement
- The Georgia State Assembly

Duties

Duties are related to the implementation of Title I 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 situation, 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 I, the Department 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 the Department on other pertinent issues related to Title I.

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 meetings as needed.
- A Title programs designee will act as the executive secretary and will develop meeting agendas with input from membership and maintain, at the Department, documentation of all meetings, agendas, and other pertinent data.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

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 Department 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

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

Intradistrict Transfer Option

Beginning with 2012–2013 school year, the NCLB Choice was replaced by state law (O.C.G.A. §§ 20-2-2130–20-2-2131) Intradistrict Transfer. The Intradistrict Transfer option allows a parent/guardian the option to request a transfer from the child’s assigned school to a school of the parent’s choice within the school zone/district in which the child resides. It is the responsibility of each LEA to develop and implement local policy, procedures, and processes for and consistent with (O.C.G.A. §§ 20-2-2130–20-2-2131) Intradistrict Transfer.

The Georgia General Assembly passed a state law in 2009 (House Bill 251) called Intradistrict Transfers. As required by the Official Code of Georgia Annotated (O.C.G.A.) §20-2-2131, school systems must inform parents of their intradistrict transfer rights. All notification must be made prior to July 1st of the upcoming school year. Please refer to the Georgia Code at <http://www.legis.ga.gov/en-US/default.aspx> for additional information.

It is the responsibility of each LEA to develop and implement local policy, procedures, and processes for and consistent with (O.C.G.A. § 20-2-2130–20-2-2131) Intradistrict Transfer.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Paraprofessionals

The Elementary and Secondary Education Act of 1965 (ESEA) requires that all paraprofessionals who work in a program supported by Title I funds (schoolwide program or targeted-assistance program) must meet state qualifications.

The state of Georgia ensures that it has professional standards for all paraprofessionals working in any school, including qualifications that were in place on the day before the date of enactment of the Every Student Succeeds Act. In Georgia, a paraprofessional employed by a Georgia LEA must meet one of the following requirements:

Degree: Hold an associate's degree or higher in any subject from a Georgia Professional Standards Commission (GaPSC) – accepted accredited institution; or

Coursework: Have completed two (2) years of college coursework (sixty [60] semester hours) at a GaPSC – accepted accredited institution; or

Content Area Test: Have passed the GACE Paraprofessional Assessment. If eligibility is established through the assessment, the applicant must also hold a minimum of a high school diploma or GED equivalent.

Note: An educator holding a valid Clear Renewable Teaching, Service, or Leadership certificate is considered qualified to serve in a paraprofessional position and does not need to also hold a Paraprofessional certificate.

All individuals holding a current Paraprofessional certificate in Georgia must meet requirements for certificate renewal.

Professional Qualification Requirements for Paraprofessionals in CHARTER SCHOOLS that DO NOT Require Certification: ESSA requires that all paraprofessionals who work in a program supported by Title I funds (schoolwide program or targeted-assistance program) meet professional qualifications. Professional Qualification paraprofessional requirements do not apply to those working in pre-kindergarten classrooms unless the position is funded by Title I.

A paraprofessional is an individual with instructional duties. Individuals who work solely in non-instructional roles, such as food service, cafeteria or playground supervision, personal care services, and non-instructional computer assistance, are not considered to be paraprofessionals for Title I purposes. The requirements do not apply to paraprofessionals who work with special education students performing non-instructional duties, such as assisting with mobility and bodily functions. The requirements do not apply to paraprofessionals with: (a) primary duties to act as a translator or (b) duties consisting solely of conducting parental involvement activities. (See Title I, Part A, Section 1119 c-g.) The requirements do not apply to aides.

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

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

- 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.

These paraprofessionals may not be assigned duties inconsistent with the above list of instructional support duties. Additionally, paraprofessionals may not provide instructional support to students unless they are under the direct supervision of a highly 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.

A paraprofessional may assume limited duties that are assigned to similar personnel who are not working in a program supported with Title I 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.

Parent and Family Engagement

All requirements related to Title I, Part A parent and family engagement are described in the 2017-2018 Systemic Family Engagement guide (aka the “Handbook”) online at <http://www.gadoe.org/School-Improvement/Federal-Programs/Partnerships/Pages/Handbook.aspx>

Notices to parents of English Learners (ELs)

Previously stated in both Title I and Title III under the Elementary and Secondary Education Act (ESEA), the overarching parent and family engagement law regarding notices to parents of English Learners (ELs) is now under Title I, Part A, Section 1112(e)(3) in the Every Student Succeeds Act (ESSA) which states:

Each local educational agency using funds under Title I or Title III to provide a language instruction educational program as determined under Title III shall, not later than 30 days after the beginning of the school year, inform parents of an English learner identified for participation or participating in such a program, of—

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

- (i) the reasons for the identification of their child as an English learner and in need of placement in a language instruction educational program;
- (ii) the child’s level of English proficiency, how such level was assessed, and the status of the child’s academic achievement;
- (iii) the methods of instruction used in the program in which their child is, or will be, participating and the methods of instruction used in other available programs, including how such programs differ in content, instructional goals, and the use of English and a native language in instruction;
- (iv) how the program in which their child is, or will be, participating will meet the educational strengths and needs of their child;
- (v) how such program will specifically help their child learn English and meet age-appropriate academic achievement standards for grade promotion and graduation;
- (vi) the specific exit requirements for the program, including the expected rate of transition from such program into classrooms that are not tailored for English learners, and the expected rate of graduation from high school (including four-year adjusted cohort graduation rates and extended-year adjusted cohort graduation rates for such program) if funds under this part are used for children in high schools;
- (vii) in the case of a child with a disability, how such program meets the objectives of the individualized education program of the child, as described in section 614(d) of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d)); and
- (viii) information pertaining to parental rights that includes written guidance—
 - (I) detailing the right that parents have to have their child immediately removed from such program upon their request;
 - (II) detailing the options that parents have to decline to enroll their child in such program or to choose another program or method of instruction, if available; and
 - (III) assisting parents in selecting among various programs and methods of instruction, if more than 1 program or method is offered by the eligible entity.

(B) SPECIAL RULE APPLICABLE DURING THE SCHOOL YEAR.—For those children who have not been identified as English learners prior to the beginning of the school year but are identified as English learners during such school year, the local educational agency shall notify the children’s parents during the first 2 weeks of the child being placed in a language instruction educational program consistent with subparagraph (A).

(C) PARENTAL PARTICIPATION.—

- (i) **IN GENERAL.**—Each local educational agency receiving funds under this part shall implement an effective means of outreach to parents of English learners to inform the parents regarding how the parents can—
 - (I) be involved in the education of their children; and
 - (II) be active participants in assisting their children to—
 - (aa) attain English proficiency;
 - (bb) achieve at high levels within a wellrounded education; and
 - (cc) meet the challenging State academic standards expected of all students.
- (ii) **REGULAR MEETINGS.**—Implementing an effective means of outreach to parents under clause (i) shall include holding, and sending notice of opportunities for, regular meetings for the purpose of formulating and responding to recommendations from parents of students assisted under this part or Title III.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

The Georgia Department of Education recommends that district Title I and Title III staff collaborate to comply with federal requirements in preparation for the 2017-2018 school year. Templates are available in English and other languages for local educational agencies to use in notifying parents of ELs of their child's eligibility for federally funded supplemental language support programs. To download the templates, please visit the Family-School Partnership Program website at <http://partnerships.gadoe.org>.

Academic Achievement Awards Program

Title I Reward Schools Program

Introduction

To reward successful schools and school districts for significant progress in improving student achievement and/or significant progress in closing the achievement gap, the Georgia Department of Education (Department) honors K–12 Title I schools and school districts for significant progress in improving student achievement and/or making significant progress in closing the achievement gap.

The Title I Reward Schools program recognizes and honors two categories of Reward Schools: Highest-Performing Reward Schools and High-Progress Reward Schools.

- A **Highest-Performing Reward School** is a Title I school among the Title I schools in the state that has the highest absolute performance over three years for the all-students group and for all subgroups based on statewide assessments and, at the high school level, is also among the Title I schools with the highest graduation rates. A school may not be classified as a highest-performing school if there are significant achievement gaps across subgroups that are not closing in the school.
- A **High-Progress Reward School** is a Title I school among the 10-percent of Title I schools in the state that is making the most progress in improving the performance of the all-students group over three years on the statewide assessments and, at the high school level, is also among the Title I schools in the state that is making the most progress in increasing graduation rates. A school may not be classified as a high-progress school if there are significant achievement gaps across subgroups that are not closing in the school.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

Timelines

Fall/Winter	Title I Reward Schools are selected by the state educational agency.
Fall/Winter	Title I Reward Schools are recommended to the State Board of Education.
Fall/Winter	Schools are officially notified of recognition.
Fall/Winter	Local educational agency assurances are due to Georgia Department of Education.
June	Recognition at Title Programs conference.

How State Data Will Be Run to Determine List of Highest-Performing Title I Reward Schools

- Count the number of Title I schools in the state for the previous school year.
- Multiply the number of Title I schools in the state for the previous school year by 5-percent.
- The resulting value is the number of Title I schools in the state that are to be identified as Highest-Performing Reward Schools.
- At the school level, aggregate the all-student and subgroup achievement results based on assessment data from the previous three-years for all End-of-Course Tests (EOCTs), all Georgia Milestones 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 Title I schools based on the average of their three-year aggregate achievement results from highest achievement to lowest achievement.
- Remove schools from the list of schools that have been identified as Focus or Priority Schools.
- Remove high schools from the list that are not among the schools with the highest graduation rates.

Identify the top 5-percent of Title I schools in any given fiscal year as Highest-Performing Reward Schools.

How State Data Will Be Run to Determine List of High-Progress Title I Reward Schools

- Count the number of Title I schools in the state for the previous school year.
- Multiply the number of Title I schools in the state for the previous school year by 10-percent.

Implementing Title I in Georgia Schools FY18 Handbook for Title I Directors

- The resulting value is the number of Title I schools in the state that are to be identified as High-Progress Reward Schools.
- At the school level, aggregate the all-student and subgroup achievement results based on assessment data from the previous three-years for all End-of-Course Tests (EOCTs), all Georgia Milestones 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.
- Based on aggregate achievement results, calculate progress using the following formula: $[(\text{year 1 results} - \text{year 2 results}) + (\text{year 2 results} - \text{year 3 results})]/2$
- Rank the schools based on the greatest amount of progress.
- Remove schools from the list that have been identified as Focus Schools for performance data through 2017.
- Remove schools from the list that have been identified as Priority Schools for performance data through 2017.
- Identify the top 10-percent of Title I schools in any given fiscal year as High-Progress Reward Schools.

How State Will Recognize and Reward the Title I Highest-Performing and High-Progress Schools

Georgia will recognize Highest-Performing and High-Progress Title I schools each year at the annual statewide Title programs conference. Each Title I Highest-Performing and High-Progress School will also receive a reward certificate and a recognition banner.