

## **Guidance for Title I Parts A and C, II, V, and IX Programs Due to the COVID-19 Pandemic**

This guidance document has been designed to assist Montana districts in answering questions about federal funding for schools considering school closures due to the pandemic. Much of this guidance document is set up in a question and answer format, and it is not exhaustive. Should districts have further questions, these can be referred to the program staff listed at the end of this document.

### **Title I, Part A**

**Q-**Can federal funds be spent during school closure?

**A-**Yes. Governor Steve Bullock has stated that all school funding streams will continue during the closure time period. This means that staff members paid for out of federal funds may still be compensated using those dollars.

**Q-**How will those funds be accessed?

**A-**Egrants and the OPI's accounting systems are not affected by school closure rules. Drawdowns can still be made according to previous deadlines. Requests for funds must be submitted no later than the 25<sup>th</sup> of each month for a payment date of the 10<sup>th</sup> for the succeeding month. For example, a request for a May 10, payment must be made by April 25. There will still be two cash request dates in June, while there will be no cash requests taken in July due to fiscal year end.

**Q-**How will closure affect the 15% carryover rule for districts that receive \$50,000 in Title I, Part A funds?

**A-**The majority of Title I, Part A funds are used for salaries and benefits. As staff members are still to be paid, this should alleviate most of the problem. The OPI keeps track of all expenditures from districts over the school year. Those districts that have not drawn down enough funds are notified so that expenditures can be increased. The OPI will write a blanket waiver to the United States Department of Education (USED) this fall for districts that will need to carryover more than 15% of their Title I, Part A funds due to school closure so a district would not be subject to the rule that only allows the SEA to issue a waiver once every three years.

**Q-**Will school closure affect funds that have already been carried over from a previous year?

**A-**Maybe. The Egrants system spends "old" money first. Funds from a previous year are spent before dollars from the current year, however, this only happens after an amendment has been created to accept prior year funds. Districts that have not created an amendment will need to do this immediately so that prior year's funds can be spent down. If there are situations where those funds cannot be spent down during the life of the funds, the OPI will work with USED to get an extension. Also note that the "life span" of most federal funds is 27 months. Funds received in July for SY19-20 are good until September 2021.

**Q-**Our district has participating non-public school(s). How will this affect those programs?

**A-**Please refer to the OPI's guidance document for non-public school participation located at the following link: [2020 Coronavirus Guidance for Private Schools](#).

**Q-**Is the district required to provide Title I, Part A services while schools are closed?

**A-**Districts are expected to do the best that they can. Districts that have moved to an online platform may be able to give some sort of supplemental instruction to Title I students. Districts that are sending out packets of

educational materials should send supplemental materials to identified students. Unlike special education which has an IEP that is legally binding, Title I has no such requirement. Districts that have a unique way of providing Title I services are encouraged to share this information with other districts, or the OPI so that it can be disseminated across the state.

**Q-Will the statewide assessments need to be given this year?**

**A-USED** has issued guidance that the statewide assessments do not need to be given this year.

**Q-Will the OPI be having the Egrant Summer Tour in 2020?**

**A-Currently**, the OPI is still planning on having the summer trainings. These usually occur later in July. The OPI will keep districts up to date as the situation warrants. If the trainings cannot be held in person, they will be conducted virtually.

**Q-Will the OPI be conducting the regional private school trainings?**

**A-The OPI** has postponed these trainings until May. If the state is still working under restricted travel, the trainings will be done virtually.

**Q-Could Title I funds be used to upgrade the district's technology platform to assist in virtual education?**

**A-If all schools** run a schoolwide program, the district could use Title I funds to do this. As all students are identified as receiving Title I services and all teachers are considered Title I staff, this is an acceptable use of funds. It should be set up as a district wide set aside on Targeting Step 4 in Egrants. However, most likely this could not be done for targeted assistance programs. Contact the OPI for assistance as there may be work arounds in certain situations.

**Q-Can districts still receive Egrants and other federal program assistance.**

**A-Yes.** All federal programs unit staff are working. Please call or email for assistance. As all staff members are working remotely, calls will not be answered immediately. However, each staff member receives an email once a message has been left, and we will return your call as soon as possible. You will most likely get a faster response if you email.

### **Title I, Part C**

**Q-Should face to face interviews be continued for REO MEP ID and R?**

**A-Right now**, face to face interviews and visits to homes should discontinue. Recruiters should take this time to get necessary paperwork, such as potential lists of students for summer, needs assessment etc., completed. Phone follow-up calls, texting and other on-line methods of verifying residency should be used until further notice. Please check with REO Executive Director regarding agency requirements for teleworking, time reporting etc., Contact State ID and R Coordinator or Title I Part C Director regarding eligibility questions or determinations.

**Q-Will scholarships be given out, and will the national conference be held?**

**A-The scholarship committee** will continue with application reviews as scholarships will be given this year. We do not yet know if the National Conference will be held but keep checking the website to find out. NASDME is looking at the potential of virtual sessions if the Conference is not held, possibly using registrations fees toward the 2021 Conference and other contingency plans.

**Q-**Will the April NGS Advisory Meeting be held?

**A-**No. The meeting has been cancelled. A webinar will take its place. Information about it will be forthcoming.

**Q-**Should home visits continue?

**A-**Home visits should be suspended at this point in time. Please talk with your director about methods of communicating with students and parents at this time. There are on-line options and MMERC materials that can be utilized. Check with Pam White if you have questions.

**Q-**Will data reporting be completed?

**A-**All required reporting (CSPR, NGS, MSIX, and AIM) are being completed. All data systems are operational.

**Q-**Will the OPI still apply for the Consortia Incentive Grant?

**A-**The OPI plans to participate and apply for two CIGs. Utah is the lead state in one which will provide on line resources for use with students and parents which will focus on reading and math. Pennsylvania is the lead state in the second and it will focus on pre-school and parent empowerment.

**Q-**How will Project SMART training be completed this year.

**A-**The training will be done virtually. Check with Huntley MEP Director for details.

**Q-**Is the Project Directors Conference Call still on the agenda?

**A-**The OPI will be sending out a conference call appointment this week. Items to be discussed include summer funding, contingency plans for services and professional development plans.

## **Title II, Part A**

**Q-**Will school closure affect the district's Title II allocation?

**A-**No. Title II has a 100% carryover provision. A district can carryover a portion of or all its allocated amount.

**Q-**Will funds for Professional Development be allowed to carryover for next year if the Professional Development Conference is cancelled?

**A-**Yes. If the Conference was cancelled due to COVID-19 you can carryover funds you were planning on using for flight tickets, registration fees, hotel fees, and any other travel costs.

## **Title IX - McKinney-Vento Homeless Education Program**

**Q.** Does the district still have to enroll students experiencing homelessness, even though schools are closed?

**A.** Yes, even though the buildings are closed, teachers are continuing to teach and provide educational services from a distance. Students who are experiencing homelessness, either with family members or who are [unaccompanied](#), must continue to be enrolled in school. High school students should be offered the opportunity to enroll in credit bearing courses, including Montana Digital Academy, or other online learning options when appropriate.

**Q.** What should the district do if a family/student has lost housing due to job loss while the school is closed?

**A.** Students must be identified if they experience an episode of homelessness during the time period in which school is normally in session, even if educational services are being conducted in alternative settings.

Students should be marked in the district's student information system and that data must be uploaded to AIM as required by the OPI and the U.S. Department of Education (USED). For more information Refer to the [OPI's Guidance for Coding Montana Students as Homeless](#).

**Q.** May the district use federal funds to purchase laptops or hotspots to provide students experiencing homelessness with access to online coursework?

**A.** Yes, Title I, Part A, homeless set-aside funds and McKinney-Vento Homeless Grant funds may be used to purchase laptops, Chrome books, tablets, hotspots, or other electronic devices that will allow students to participate in online coursework. District administrators will need to check their Egrants applications to determine if these funds have been budgeted for supplies. If necessary, the ESEA Consolidated Application may need to be amended to budget additional funds for the homeless program, or to shift funds into "Supplies" so that items may be purchased. Any electronic devices purchased with federal funds must be labeled and inventoried as belonging to the district. Items purchased with McKinney-Vento funds belong to the homeless program and should be returned to that program's inventory upon their return.

**Q.** May the district use federal funds to purchase other school supplies that students experiencing homelessness will need to complete online coursework at home?

**A.** Yes. Teachers should be encouraged to provide all students with assignments that do not require additional supplies during periods of "social-distancing" or when local stores are closed. Teachers may need to offer alternative assignments to students who do not have access to art supplies, photography equipment (smart phones, etc.), or other supplies that might normally be available in the classroom.

**Q.** What else can the district purchase with Title I, Part A homeless set-aside funds or McKinney-Vento funds?

**A.** These funds are to be used to provide educational access and equity. If students need additional items to achieve those goals that MAY be an allowable expense. Schools with unspent funds at the end of the school year should consider inviting identified homeless students to participate in summer school opportunities when group gatherings are allowed. Funds can be used to cover the salaries and benefits of teachers or paraprofessionals offering summer academic enrichment programs to help identified homeless students regain any lost learning. Families and students may have other non-academic needs that should be addressed using community donations. These items might include hygiene items, clothing, food (not breakfast/lunch offered through a school-based feeding program), hotel or housing costs, small household items (heaters, blankets, microwaves) etc. The OPI encourages liaisons to reach out to local and tribal governmental agencies, faith-based organizations, community service clubs (Kiwanis, Rotary, Lions, Elks, etc.), or to other philanthropic organizations in your local community for assistance in obtaining items that families or students may need that cannot be purchased with federal funds.

**Q.** The school is in contact with an unaccompanied homeless youth (UHY) who has recently left the family home. Are there services they can obtain on their own?

**A.** UHY who are at least 16 years of age can apply for SNAP (food stamp) benefits as an individual. They can also apply for Healthy Montana Kids benefits as an individual. To apply for these benefits:

1. Apply online at [apply.mt.gov](https://apply.mt.gov)
2. Call the Public Assistance Helpline-1-888-706-1535
3. Visit your local [Office of Public Assistance](#)
4. [Email for a PDF application](#)

**Q.** An unaccompanied homeless youth is attempting to enroll in college for the 2020-2021 school year. What does the school need to do to assist them?

**A.** Homeless liaisons MUST inform any UHY of their right to apply for financial aid as an independent student. College financial aid offices will require students to furnish proof of homelessness. Homeless liaisons should use Transact Form *HS-10 – Documentation of Independent Student Status for FAFSA*.

Additional Resources:

National Center for Homeless Education – [Covid-19 \(Coronavirus\) Information](#)

School House Connection - [COVID-19 and Homelessness: Strategies for Schools, Early Learning Programs, and Higher Education Institutions](#)

National Alliance to End Homelessness – [Coronavirus and Homelessness](#)

## **Title V**

**Q-**Will school closure affect the district's Title V allocation?

**A-**No. Title V has a 100% carryover provision. A district can carryover a portion of or all its allocated amount for 27 months. Funds received in July of 2019 are good through September of 2021.

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