



Montana Office of Public Instruction

ESSA Quick Reference Brief: Set Asides under Title I, Part A

The purpose of Title I, Part A, is to provide all children with significant opportunity to receive a fair, equitable, and high-quality education and help ensure that all children meet challenging academic standards. Title I-A provides financial assistance to districts and schools who serve a larger population of children from families experiencing poverty. By providing additional resources, the program is intended to help close the opportunity gaps and thus the achievement gap that some students experience.

What the Law Says

The Every Student Succeeds Act (ESSA) directs districts that receive Title I, Part A funds to reserve “such funds as are necessary” to provide services to specific groups of students. The share of funds must be based on the total allocation received by the district and be determined prior to any allowable expenditures or transfers by the district.¹



What it Means

Set-asides are funds that are reserved for district-wide activities that support Title I-A schools. These funds are reserved at the district level before funds are allocated to schools. Some set-asides are required; others are optional. Decisions concerning optional set-asides should be made carefully because the reservation of funds will reduce the funds available for distribution to schools. **Except for students experiencing homelessness, students who are reported neglected or delinquent, or students who are in Foster Care**, Title I-A funds cannot be used to benefit students in schools that do not receive Title I-A funds.

Required Set-Asides

Before allocating Title I, Part A funds to schools, LEAs **must** reserve funds for the following required activities:

- ***Equitable Services for eligible private school students.*** Districts must reserve a proportional amount to serve students who attend private schools (either inside or outside the district’s boundaries) who would otherwise attend a Title I-A funded school within the district.
- ***Services for children experiencing homelessness.*** Districts must reserve funds to provide services to students navigating housing instability, regardless of whether the eligible student(s) attend a school receiving Title I, Part A funds. ESSA does not specify an amount that must be set-aside,² but the amount should be informed by data and could include costs for a liaison, transportation for eligible students, and other activities eligible under the McKinney-Vento Act. Montana requires a minimum of \$35 per reported student.

Determining an appropriate set-aside amount requires coordination between the Title I-A coordinator and McKinney-Vento liaison.³ Additionally, it is considered best practice to include district staff responsible for transportation. Possible methods for determining the set-aside include:

¹ ESEA Section 1113(c)(3)(A); 1113(c)(3)(B); 1113(c)(3)(C)

² ESEA Section 1113(c)(3)(C)

³ ESEA Section 1113(c)(3)(A)

⁴ ESEA Section 1116(a)(3)(A)

⁵ ESEA Section 1113(c)(3)(A)

⁶ 34 CFR Part 200

⁷ ESEA, Section 1113(c)(5)

⁸ ESEA Section 1112(c)(5)

⁹ ESEA Section 1112 (a)(1)(A)



- Using an assessment of needs, as well as the number of students navigating housing in stability within the district, to determine the set-aside amount
 - Determining a percentage of the district's Title I-A funds to reserve
 - Multiplying the number of students experiencing homelessness by the district's Title I-A per-pupil allocation
 - Matching the amount of Education of Homeless Children and Youth (EHCY) subgrant dollars received by the LEA, if applicable
- **Parent and family engagement.** Districts with Title I-A allocations greater than \$500,000 must reserve an amount at least equal to 1% of the total district allocation and distribute 90% of the reserved 1% to schools receiving Title I-A funds for parent and family engagement activities.⁴ The remaining 10% (or less) may remain at the district level.
Districts that have participating private schools must discuss the engagement of private school parents and families during consultation. If parent and family engagement is a specific need of private school students, the district and the private school must work as collaborative partners to provide engagement opportunities.
 - **Services for Neglected or Delinquent .** Districts that have within their boundaries a local (not state run) residential facility for students without parental supervision (neglected), and report this facility in the October caseload count, are required to set-aside Title I-A funds to provide services to children in those facilities.⁵ This data is collected through the Neglected and Delinquent, Title I-D program and must be used to inform the needs of this set aside. The amount of Title I-A dollars reserved for serving children and youth in this category is a per-child amount based on the number of students submitted in the October caseload count and the district's total Title I-A allocation. Districts that receive Title I-D, Subpart II funds can choose to supplement services to students in locally run facilities or community day programs with this set-aside.

NOTE: If an LEA is required to spend a specific amount of its Title I-A allocation each year for a specific purpose (e.g. family engagement), the LEA must meet that obligation. If it does not do so in the year for which funds were allocated, unspent funds must be carried over and spent for the specific purpose the following year.

Optional Set-Asides

While there is no specific limit or amount of money a district can reserve for optional set-asides, Title I-A is a school-based program, and the funds are intended to support the schools serving students experiencing poverty. Districts may set-aside funds for the following optional activities:

- **Administering the Title I program.** Administrative costs may include staffing, at the district level, to administer Title I-A programs and other expenses required to carry out the administration of Title I-A services throughout the district for public and private school children. Funds reserved for this purpose should meet the necessary and reasonable guidelines.⁶
- **Professional Development.** This set-aside can be used to provide professional learning to teachers in Title I-A schools. In schools implementing a schoolwide program, this includes all instructors/staff in the school. In schools implementing a

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targeted program, this includes instructors/staff working with identified students.

- **Additional Set-Asides.** There are number of purposes for which this set-aside can be used:
 - **Early Learning** - Early learning activities in schools implementing a Title I-A program for children from birth to the age at which the LEA provides a free public elementary education⁷, including full day kindergarten and preschool.
 - **Foster Care** – Assist in the provision of services for students experiencing foster care which may include additional costs to transport children to their school of origin.⁸
 - **Extended Time:** This set-aside can be used for summer school and/or before and after school programs for students who attend Title I-A schools.

Recommendations for Practice

- **Involve families and community members.** Districts are required to develop Title I-A plans through timely and meaningful consultation with teachers, principals, and other appropriate school personnel, along with families of children in schools served under Title I-A.⁹ Districts should solicit input on the plan and proposed use of funds, including optional set-asides.
- **Maintain focus on the result of the needs assessment.** Funds reserved for strategies and activities at the district level for optional set-asides should address needs and strategies identified by Title I-A funded schools.
- **Consider the impacts.** Focus on strategies that will have the greatest impact on improving student achievement.

Questions for Reflection

1. What percentage of the total allocation is reserved at the district level? Is this percentage reasonable?
2. Could the funds being reserved at the district level be used for the same purpose if they were allocated to schools?
3. Are the proposed services/materials/staff paid out of the set-aside identified in the needs assessments of our Title I-A funded schools?
4. How have we engaged with parents, staff and others about the use of set-aside funds to meet district goals? What was the process and who gave feedback?

Resources

- [Every Student Succeeds Act](#)
- [Title I, Part A Equitable Services Non-Regulatory Guidance](#) (U.S. Department of Education)
- [Early Learning in the Every Student Succeeds Act](#) (U.S. Department of Education)
- [Letter regarding Title I, Part A reservation to serve homeless students](#) U.S. Department of Education)

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