



Title I, Part A: Improving Basic Operated by Local Educational Agencies

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Title I, Part A Purpose

Title I, Part A is a federal program designed to provide additional academic support and learning opportunities to help low-achieving children master challenging curricula and meet state standards in core academic subjects. Title I, Part A, along with the rest of the Elementary and Secondary Education Act was reauthorized on December 10, 2015, by the Every Student Succeeds Act, P.L. 114-95. Title I, Part A is located in sections 1111-1119 of the Elementary and Secondary Education Act (ESEA) of 1965 as amended by the Every Student Succeeds Act (ESSA) in 2015. Both ESEA and ESSA are commonly used when referencing and citing the statute. LEAs are responsible for completing the program application and overseeing program implementation in participating schools.

Title I, Part A Required Key Components Quick Reference & SY Timeline

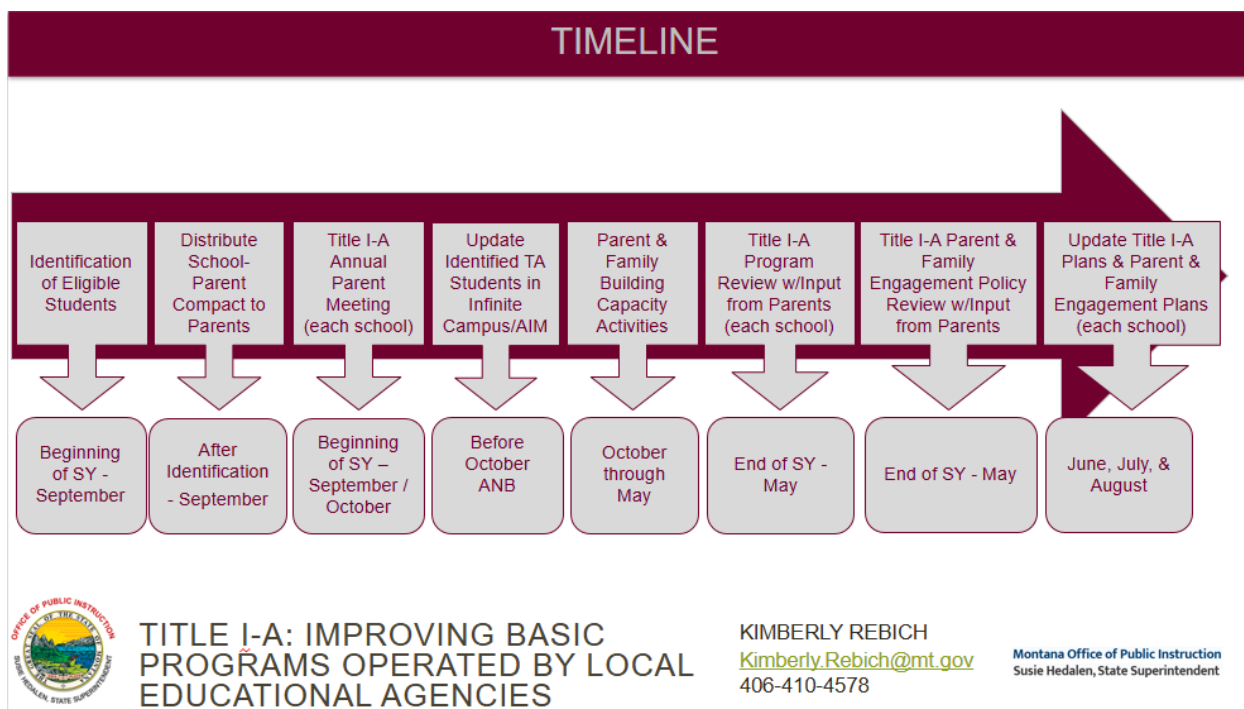
KEY ESEA TITLE I-A REQUIREMENTS	
TITLE I-A PLAN	<ul style="list-style-type: none">Targeted Assistance Plan or Schoolwide Plan – This is <u>not</u> the ISAPMust be developed with timely and meaningful consultation with parentsReviewed and revised as necessary based on student needsMust be made available and accessible to parents and the public
TITLE I-A PARENT & FAMILY ENGAGEMENT	<ul style="list-style-type: none">Title I-A District Parent & Family Engagement Written PolicyTitle I-A School Parent & Family Engagement Plan/Policy (for each school)Title I-A Annual Parent Meeting (for each school) – Beginning of SYTitle I-A School-Parent Compact (for each school) – Beginning of SYTitle I-A Building Capacity for Parent Engagement Activities (for each school) – Throughout the SY
TITLE I-A PROGRAM REVIEW	<ul style="list-style-type: none">Review with input from parents of students served by the Title I-A ProgramEach schoolEnd of the SY<ul style="list-style-type: none">Title I-A PlansTitle I-A School Parent & Family Engagement Plans/PoliciesTitle I-A School-Parent Compacts
TITLE I-A PARENT & FAMILY ENGAGEMENT WRITTEN POLICY REVIEW	<ul style="list-style-type: none">Review with input from parents of students served by the Title I-A ProgramDistrictEnd of the SY<ul style="list-style-type: none">Title I-A Written Parent & Family Engagement Policy Review – Required Annually



TITLE I-A: IMPROVING BASIC PROGRAMS OPERATED BY LOCAL EDUCATIONAL AGENCIES

KIMBERLY REBICH
Kimberly.Rebich@mt.gov
406-410-4578

Montana Office of Public Instruction
Susie Hedalen, State Superintendent
Montana Office of Public Instruction
Susie Hedalen, State Superintendent



Title I, Part A Program Models

Title I, Part A programs can be executed through two primary models: Targeted Assistance Programs and Schoolwide Programs. The allocation of Title I funds to an LEA is determined by the total amount received under various funding formulas. LEAs direct these funds to schools with the highest proportions of students from low-income families. In schools utilizing a targeted assistance model, Title I services are specifically aimed at students who are struggling or at significant risk of not meeting academic standards. Conversely, schools where at least 40 percent of the student body comes from low-income families can implement schoolwide programs, benefiting all students and focusing on improving the performance of those who are the lowest achievers.

Title I, Part A Targeted Assistance Program

Targeted Assistance Programs help students meet state standards and guide systematic improvement. A Targeted Assistance Program is designed to provide extra educational assistance beyond the regular classroom to students identified as having the greatest need for additional assistance. The programs must use Title I, Part A funds to provide academic services to children who are identified as failing or at risk of failing to meet state standards. The school makes this determination based on multiple, educationally related, objective criteria, and places students on a rank order list. Any school with a poverty average of at least 35% or the district's poverty average (whichever is lower) is eligible to operate a Targeted Assistance Program.



Section 1115 of the Every Student Succeeds Act states that districts may provide program services to eligible children who have the greatest need for special assistance through a Targeted Assistance Program:

- in schools that are ineligible for a schoolwide program;
- in schools that have not received a waiver to operate a schoolwide program; or
- if the district chooses not to operate a Schoolwide Program.

Any Title I-A school that does not operate a Schoolwide Program must operate a Targeted Assistance Program. When implementing a Targeted Assistance Program, the school uses Title I-A funds to provide additional supports to specifically identified students most at risk of failing to meet state standards.

Targeted Assistance schools must determine which students they will serve by identifying the students with the greatest need. As a result, only the students identified are eligible to receive the services.

Title I, Part A Schoolwide Program

Schoolwide Programs allow a school to consolidate its federal, state, and local funds to upgrade the entire educational program. The focus of the program must be on addressing the needs of low-achieving children and those at risk of not meeting state student academic achievement standards. Any school with a poverty average of at least 40% (or if the building has applied for and received a waiver from the OPI) may operate a Schoolwide Program.

Schoolwide Programs funded under Title I, Part A offer the opportunity to invest in strategies that help all students, because all students in a Schoolwide Program can be served. While many schools target services to the most in-need students, a Schoolwide program allows for the implementation of tiered supports addressing student needs at every level.

Schools where 40% percent or more of families are experiencing poverty are eligible to adopt Schoolwide Programs to support students most at risk of not meeting Montana's standards. The schoolwide model is more flexible (all students participate), coordinated (all students are responsible for meeting the same high standards) and unifying (parents, community members and staff come together to redesign the school). In short, through implementation of a Schoolwide Program, the school can address community needs and systemic issues impacting students' abilities to succeed.

The year-long planning process to adopt a Schoolwide Program includes:

- Send a letter of intent to the OPI - please email Intent to Apply letters and applications [Zach Hawkins](#)
- Complete a Comprehensive Needs Assessment
- Complete and send in [schoolwide plan template](#) for review
- Complete an update in the Integrated Strategic Action Plan (ISAP)



Title I, Part A Plan (Required)

To ensure that all children receive a high-quality education, and to close the achievement gap between children meeting the challenging State academic standards and those children who are not meeting such standards, each local educational agency shall develop a Title I, Part A Plan that (ESEA 1112):

- is developed with timely and meaningful consultation with teachers, principals, other school leaders, paraprofessionals, specialized instructional support personnel, charter school leaders (in a local educational agency that has charter schools), administrators (including administrators of programs described in other parts of this title), other appropriate school personnel, and with parents of children in schools served under this part; and
- as appropriate, is coordinated with other programs under ESEA, and other Acts as appropriate.
- is regularly reviewed, monitored, and revised as necessary based on student needs to ensure that all students are provided opportunities to meet the challenging State academic standards with meaningful consultation with parents of children in schools served under Title I, Part A.

Resources

- [Title I, Part A Targeted Assistance Plan \(template\)](#)
- [Title I, Part A Schoolwide Plan \(template\)](#)

Title I, Part A Annual Meeting (Required)

Each year, recommended at the beginning of the SY, schools served by Title I, Part A programs are required to host a meeting for parents to explain what the Title I, Part A program is and how parents can become involved in the Title I, Part A program. This is different from the annual evaluation districts are required to conduct with parents and family members of children served by Title I, Part A programs. A school district may hold a meeting for parents and family members to review and improve the content and effectiveness of the Title I school district policy.

The following issues must be addressed at the Title I, Part A Annual Meeting:

- Inform parents of their school's participation in Title I, Part A
- Explain Title I, Part A requirements.
- Explain what participation in Title I, Part A means, including:
 - a description and explanation of the school's curriculum.
 - information on the forms of academic assessment used to measure student progress; and
 - information on the achievement levels of state academic standards that students are expected to meet.
- Explain the district Parent and Family Engagement Policy, School Parent and Family Engagement Plan/Policy, and School-Parent Compact.



- Explain how parents and family members can be involved in planning, reviewing, and improving the school and district Title I, Part A policies, and the Title I, Part A Plan and why their participation is critical to program success.
- Explain that parents have the right to request regular meetings with school staff to offer suggestions and to participate, as appropriate, in decisions about the education of their children. The school must respond to any such suggestions as soon as practicably possible.

To keep parents informed, schools must invite all parents of children participating in Title I Part A programs and encourage them to attend. In a Schoolwide program, this means ALL parents should be invited; in a Targeted Assistance program, just those parents with children participating in Title I, Part A, should be invited.

Schools should be able to document the annual parent meeting with minutes, agendas, sign-in sheets, etc.

Resources

- [Title I, Part A Annual Meeting Required Components](#)

Title I, Part A District Parent and Family Engagement Written Policy (Required)

All school districts receiving Title I funds are required under Section 1116(a)(2) of the Every Student Succeeds Act (ESSA) to develop a written [Parent and Family Engagement Policy](#) for the school district. ESSA states that the District Parent and Family Engagement Policy must be jointly developed with parents, incorporated into both the Title I, Part A LEA Plan and Title I, Part A Parent and Family Engagement Plan, and distributed to parents of participating children in a format and language parents can understand.

LEAs are required to conduct, with meaningful involvement of parents and family members, an annual evaluation distinct from the required Title I, Part A Annual Meeting and recommended at the end of the SY, of the content and effectiveness of the parent and family engagement policy in improving the academic quality of all schools served under Title I, Part A including identifying:

- barriers to greater participation by parents in Title I, Part A activities.
- The needs of parents and family members to assist with the learning of their children, including engaging with school personnel and teachers.
- Strategies to support successful school and family interactions.

Resources

- [Title I, Part A District Parent and Family Engagement Policy Required Components](#)



Title I, Part A School Parent and Family Engagement Plan/Policy (Required)

ESEA requires schools to develop their own parent and family engagement plans/policies and disseminate them to parents. These policies should be aligned to the district's written parent and family engagement policy, but they should be distinct and facilitate building-level parental engagement. The plan is made available to the local community and is updated periodically to meet the changing needs of parents and the school. 1116(b).

- Title I-A schools must develop and share written Parent and Family Engagement School Plans/Policies
- Schools must involve parents in creating the plan/policy
- Schools must disseminate the plan/policy
- Annual evaluation recommended at the end of the SY

Resources

- [Title I, Part A School Parent and Family Engagement School Plan/Policy Required Components](#)
- [Title I, Part A School Parent and Family Engagement Plan/Policy \(Template\)](#)
- [Title I, Part A District Parent and Family Engagement Written Policy AND School Parent and Family Engagement Plan Components Checklist](#)

Title I, Part A School-Parent Compact (Required)

Each Title I-A school shall jointly develop with parents a school-parent compact that outlines how parents, the entire staff, and students will share the responsibility for improved student achievement and how the school and parents will build and develop a partnership to help students achieve the state's high academic standards. Each school distributes compacts to parents and families annually 1116 (d). Elementary schools must distribute compacts at a parent teacher conference and explain how they relate to the child's individual achievement. 1116 (d)(2)(A).

The Compact is used to create a partnership between the school, teachers, and parents to help attain better student achievement. The Compact is signed by teachers, parents, and the student when appropriate. The compact should:

- Describe the school's responsibility
- Describe the parents' responsibility
- Describe the student's responsibility if desired
- Address importance of communication between teachers and parents through:
 - at least an annual parent-teacher conference in elementary schools that includes discussion about how the compact relates to individual achievement
 - frequent reports to parents on their children's progress



- reasonable access to staff, opportunities to volunteer, and observe classroom activities

Title I, Part A Building Capacity for Parent and Family Involvement (Required)

In addition to the required annual Title I, Part A Meeting, schools must also offer a flexible number of additional activities to encourage parent and family engagement. Each school must carry out activities and strategies that are aligned with the LEA's parent and family engagement policy which helps to build the capacity of Title I parents and families for meaningful engagement in their child's education, 1116(e). Building capacity for parent and family involvement is the effort that both the school and district provide to allow time, space, information, training and other supporting functions that allow parental involvement to grow and become more effective throughout the school year.

Schools and districts must offer activities and resources that assist parents in comprehending state academic content standards, assessments, and achievement benchmarks, as well as strategies for monitoring their child's progress and collaborating with educators to enhance learning outcomes. Additionally, providing training and materials will empower parents to support their children's academic success. It is also essential to educate all staff on the importance of family engagement, ensuring that parents are actively involved in the educational process.

Resources

- [Title I, Part A Building Parent Capacity Log](#)

Title I, Part A Allowable and Common Uses of Funds

Guidance on Allowable and Unallowable Title I, Part A Expenditures

LEAs should take the following steps to determine if a proposed program or activity and any associated expenditures are allowable under Title I, Part A:

- Ensure the expenditures are consistent with the purpose of Title I, which is to provide all children with a significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps;
- Verify that proposed Title I, Part A expenditures are reasonable, necessary, and allocable considering the amount of money being spent and the needs of the program.
 - Reasonable: consistent with prudent business practice and comparable current market value. (2 CFR 200.404)
 - Necessary: required to carry out the intent and purpose of the Title I, Part A program. (2 CFR 200.403)
 - Allocable: A cost is allocable to a particular Federal award or other cost objective if the goods or services involved are chargeable or assignable to that Federal award or cost objective in accordance with relative benefits received (2 CFR 200.405).



- Ensure that the identified needs are listed in the LEA's Title I, Part A Plan and in the Title I, Part A section of the Consolidated Application, and that the proposed expenditure addresses the identified needs.
 - For nonpublic schools, confirm that the LEA Affirmation of Private School Consultation Form indicates the need for the proposed Title I, Part A activities.

Required Title I, Part A Reserves

Homeless Reserve

LEAs are required to reserve funds to provide comparable Title I-A services to students experiencing homelessness in participating and non-participating Title I-A schools. Montana requires that reservation to equal at least \$35 per reported student. A minimum of \$35 must be reserved if the LEA has zero identified homeless students.

Neglected Reserve

LEAs with a reported neglected count are required to reserve funds to provide comparable Title I-A services to reported neglected students in participating and non-participating Title I-A schools. Montana requires that reservation to equal at least \$35 per reported student.

Parent and Family Engagement Reserve

LEAs with Title I, Part A allocations greater than \$500,000 must reserve an amount equal to 1% of the Title I, Part A allocation and allocate 90% of those funds to Title I schools for Parent and Family Engagement activities. These funds must be clearly identified in the Title I budget.

Additional Reserve Requirements

Additional reserves are required for LEAs with Neglected and Delinquent facilities and students attending private schools.

Targeted Assistance Program Expenditures

In Targeted Assistance schools, Title I, Part A funds may only be used to meet the specific needs of children, as well as teachers or staff who provide services to those children, who are identified as being in the greatest academic need. Students must be identified as eligible using multiple, educationally related, objective criteria.

Schoolwide Program Expenditures

In Schoolwide programs (SWP), Title I, Part A funds are used to upgrade the entire educational program in a school, and all students in the school may benefit from the use of Title I, Part A funds. Activities must be part of the schoolwide plan and support an identified academic need through the school's comprehensive needs assessment. In addition to supplemental services, SWPs may provide elective courses to prepare or support low-achieving students to take advanced courses, preschool enrichment programs, and programs to improve outcomes for students with disabilities and English learners. For more information see the [Federal guidance regarding use of funds in a Schoolwide Program](#).



Allowable Title I, Part A Expenditures

Supports for Title I Students:

- AIS, RTI, and credit recovery services
- Certified teachers and paraprofessionals
- Proportional benefits for Title I salaries
- Counseling, school-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students' skills outside the academic subject areas; these must be aligned to a Schoolwide Program Plan or meet an identified need for eligible students in a Targeted Assistance program
- Equitable services for private school students
- Pre-K, summer, and extended day programs
- Transportation for Title I programs if not otherwise available

Support Staff for Title I Programs:

- Teacher aides (non-instructional services)
- Data management staff for Title I only
- Secretary and/or clerks for Title I only
- Title I coordinators and administrators
- Stipends for principals outside of contract hours
- Nurses for summer and Title I programs

Title I Program Supplies and Materials:

- Instructional materials for Title I programs
- Computer aided instructional software for Title I programs
- Diagnostic and progress monitoring materials for Title I programs
- Title I data management software
- Technology to upgrade the educational program of a SWP

Title I Parent and Family Engagement:

- Parent liaison or coordinator
- Family engagement consultants
- Stipends for staff to plan for or participate in Title I activities outside contract hours
- Costs for activities including materials, transportation, and childcare

Professional Development aligned with Title I:

- Stipends and/or substitutes for staff
- Professional development aligned to a Schoolwide Program plan or directly related to the needs of participating Title I students
- Educational consultants
- Reasonable supplies and materials for Title I professional development



- Travel costs are allowable if they relate to the grant program activities. NOTE: The district should have a travel cost policy that is applied consistently across federal and non-federal programs. The policy should cover mileage, air fare, lodging, meals and/or per diem rates. Hotel rates for conferences or trainings must be reasonable.

Other:

- Field trips aligned with academic content or to provide enhanced learning experiences
- Preparation for and awareness of opportunities for postsecondary education and the workforce. This may include career and technical education programs and broadening secondary school students' access to coursework to earn postsecondary credit while still in high school (such as Advanced Placement, International Baccalaureate, dual or concurrent enrollment, or early college high schools)
- Student awards for effort and achievement (not participation), which are nominal and non-monetary

Unallowable Title I, Part A Expenditures

General Expenditures:

- Base pay for principals (contract hours)
- Superintendents and deputies with districtwide responsibilities
- Direct reimbursements to private schools

Targeted Assistance Programs:

- Costs/services that are not targeted to at-risk students
- Special Education services (OT, PT, Speech)
- Part 154 services for English Learners

Supplies and Materials:

- Food and refreshments for staff activities, including working lunches
- Furniture and office equipment is generally not allowable unless it is necessary for a Title I room/program. If such a situation occurs, the district must provide justification and receive OPI approval prior to purchasing.
- Incentives to reward students for participation in a Title I program, such as monetary awards or rewards with monetary value such as passes to amusement parks gift certificates
- Any costs related to entertainment, amusement, or diversion
- Title I supplies or materials to private schools without Title I funded services
- Core instructional materials for private schools

Other:

- Field trips for entertainment or recreational purposes only
- Construction, Remodeling, or Renovation projects are not allowable



Title I, Part A Monitoring

Monitoring Purpose

The purpose of ESEA Consolidated Monitoring is to provide the support districts need with the implementation federal programs while navigating the requirements that each program has within the Elementary and Secondary Education Act. The intent is not to look for things that are wrong, but to learn how districts are utilizing their federal funds, assure that they are meeting the requirements within each fund, and if this is not the case, assist the district with implementing changes that will help them meet the requirements while also strengthening their programs. This process is done to help protect districts and the state of Montana from any consequences that may occur from state or federal audits of federal programs and funds in the consolidated application. The objectives of the OPI for monitoring are centered around three key areas:

1. **Building Relationships** – We're in this together. The main objective for the Montana Office of Public Instruction (OPI) is to raise student achievement for Montana's public-school children. Through cooperative assessment of the federal programs between the OPI and Montana school districts the quality of services to students will be strengthened and improved.
2. **Technical Assistance** – We're here to help. The OPI Federal Programs team provides technical assistance during the review and beyond. It is not the OPI's intent to tell the district how to run its title programs, but rather to answer questions, facilitate dialogue, and exchange ideas and information for program improvement while, at the same time, meeting all federal requirements.
3. **Compliance** – It's the law. Monitoring federal programs helps ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education. Monitoring is intended to be a collaborative partnership between the OPI and districts to ensure compliance with the Every Student Succeeds Act (ESSA).

While accountability to federal requirements is important, the goal of monitoring is to provide technical assistance and support districts in their implementation of federal programs.

Monitoring Protocol

The responsibility for monitoring resides with the OPI, mandated by ESEA statute. The Federal Programs unit has synthesized ESEA program requirements into a meaningful and manageable collection of requirements in a [Monitoring Organizational Tool](#). The [Monitoring Organizational Tool](#) includes information on the requirements within ESEA for which districts will be monitored. While the indicators listed in this document provide a comprehensive overview of the programs, it does not encompass every requirement in a grant program. A table is included for each title program that contains:

- a description of each of the monitoring indicators.
- the relevant portion of ESEA law that applies.



- supporting documentation that should be maintained by the district.

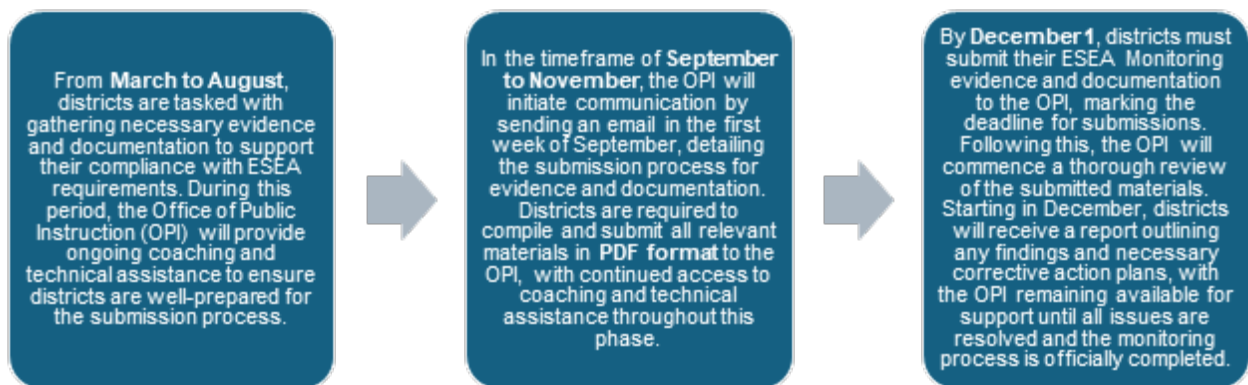
All districts are encouraged to use this tool as a resource for organizing, collecting, and submitting documentation related to ESEA federal programs when a district is selected for monitoring. The Federal Programs unit will use the [Monitoring Organizational Tool](#) and its indicators to evaluate ESEA program compliance.

Monitoring Process



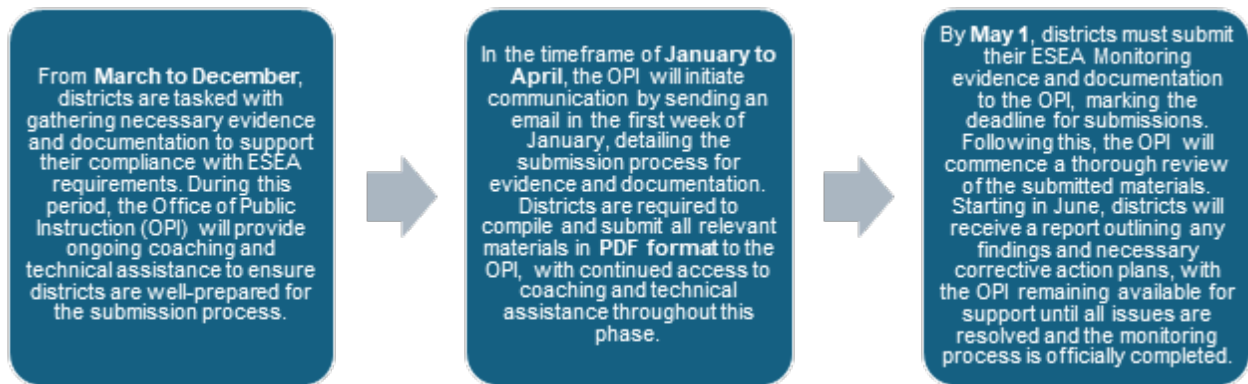
LEAs chosen for ESEA Consolidated Monitoring receive notification in March regarding the monitoring scheduled for the following school year.

Fall Monitoring





Spring Monitoring



Monitoring Submission of Materials

The OPI will provide the LEA superintendent with a secure link to a district monitoring folder for uploading evidence, which will be accessible to both the OPI and the LEA. The LEA will use the [Monitoring Organizational Tool](#) as a checklist to compile all required documentation. Each document must be saved individually in PDF format and renamed to include the relevant item number from the [Monitoring Organizational Tool](#), such as IA-A, CC-H, MV-B, etc. Once the documentation is collected and prepared, the LEA will upload it to the district monitoring folder via the secure link. Within this folder, program subfolders will be organized under the Evidence Folders.

Notice to all districts: Due to the wide range of district and school parental notification forms, and the fact that many do not meet federal requirements, beginning with School Year (SY) 2021-22, [TransACT](#) documents must be used by ALL LEAs. Those sections where TransACT forms must be used are identified within the Monitoring Organizational Tool. The OPI has partnered with TransACT Communications to provide state approved and legally reviewed parent notices, forms, and letters at no cost for district and school staff. The Montana Office of Public Instruction (OPI) pays for a state subscription to TransACT for all Montana districts.

- TransACT Parent Notices must be completed with LEA contact information, updated annually, and made available/accessible to parents and families.
- LEAs are encouraged to include annually updated TransACT Parent Notices as part of student enrollment packets, parent/student handbooks, and district webpages.
- Required TransACT Parent Notices are listed on each program's monitoring tool.

Monitoring Review of Materials (Desk Monitoring)

Using the [Monitoring Organizational Tool](#), submitted materials are reviewed to determine district compliance. Upon completion of the review, The OPI will prepare a detailed report to share desk monitoring review results with the district.



Monitoring Report and Corrective Action Plan

After reviewing the documentation and evidence submitted by the LEA, the OPI will issue a detailed monitoring report. This report will outline the LEA's compliance status, suggest next steps, and highlight any findings along with necessary corrective actions to address findings.

The monitoring report is based on the primary formula grant program for:

- Title I-A: Improving Basic Programs Operated by Local Educational Agencies
- Title II-A: Supporting Effective Instruction
- Title III: English Language Acquisition, Language Enhancement, and Academic Achievement Act
- Title IV-A: Student Support and Academic Enrichment Grants
- Title IX: Education for Homeless Children and Youths

The reports for each program are in five sections:

- **Compliance area:** Section of the program being monitored.
- **Description:** Provides a brief overview of the text from federal or state law that addresses each section being monitored.
- **Finding Status:** Describes issues of compliance that will require response and correction by the district to continue to be eligible for ESEA/ESSA funding.
- **Corrective Action Plan:** Lists steps the district must take to correct the findings as it reviews and revises its Title programs. It also gives the time frame in which these corrections must take place.
- **Recommendation:** Provides additional comments, suggestions, or recommendations that the LEA may want to consider.
- **Program Contact:** Provides the contact information of the Program Specialist for this section

Resources

- [ESEA Consolidated Monitoring OPI webpage](#)
- [ESEA Consolidated Monitoring Processes & Protocols \(guide\)](#)
- [ESEA Monitoring Organizational Tool](#)