

Title I, Part A Program Guide

Tips and Tools for Title I-A Directors



Table of Contents

Introduction	3
The Purpose of Title I, Part A	3
Tips for New Title I, Part A Directors.....	3
Organization and Record Keeping	4
Technical Assistance	4
Program Design.....	4
Targeted Assistance Program	4
Schoolwide Program.....	5
Table 1. Comparing Targeted Assistance and Schoolwide Programs	6
Evidence-Based Practices.....	7
Transitioning from Targeted Assistance to Schoolwide	7
Evaluation Procedures	8
Requirements to Address Inequity in Teacher Qualifications	9
Strategies to Address Inequities	9
Equitable Services	10
Resources	10
Parent and Family Engagement in Title I, Part A	10
Parent and Family Engagement (PFE) Requirements	11
LEA-Level Required Allocation under ESSA.....	11
LEA and School Written Policy Requirements	11
Title I, Part A Parent Notice Requirements.....	11
LEA and School Required Strategies and Responsibilities for Building Capacity	11
Family and Student Partnerships in Title I, Part A	12
Building Capacity.....	12
Parent and Family Engagement Allowable Costs.....	14
Additional Guidance	15
Resources	15
Fiscal Procedures	15
Time and Effort Requirements for Federal Programs.....	15
Substitutes and Time and Effort	16

Administrators and Time and Effort	16
Food for Meetings and Conferences	16
Reasonable and Necessary	16
Data Collection and Reporting.....	17
Consolidated District Performance Report (CDPR).....	17
Comparability Report.....	17
Options When Calculating Comparability.....	17
Resources	18
Title I, Part A Allocations	18
Consultation.....	18
District Set-Asides	19
Required Set-Asides	19
Optional Set-Asides.....	19
Selecting Schools.....	19
Ranking and Serving.....	20
Criteria for Skipping a “School” (Elect Not to Serve)	20
Determining School Allocations.....	20
Calculating the Per-Child Amount (PCA).....	20
Supplement, Not Supplant.....	21
Appendices.....	22
Appendix A: Carryover Limitation.....	22
Resources	22
Appendix B: Parents/Guardians Right-to-Know	23
Communication Considerations.....	23
Resources	23
Appendix C: Coordination of Title I-A Programs with Homeless Education	24
Resources	24
Appendix D: Title I, Part A Preschool Programs.....	25
Funding Preschool Programs	25
Eligibility	25
Curriculum	25
Resources	25

Introduction

This Title I, Part A Program Guide is designed to guide Local Educational Agencies' (LEAs) Title I, Part A directors/coordinators through the process of creating and maintaining an effective Title I-A program. While it is not meant as a substitute for federal law, it does provide instructions for basic program requirements, administration, fiscal procedures, accountability, and other useful information needed to implement Title I, Part A.

This guide is based on interpretation of the Every Student Succeeds Act (ESSA), along with the regulations and guidance issued by the U.S. Department of Education (ED). While the guide will answer many questions, ODE staff are also available to provide individualized technical assistance. LEAs are encouraged to contact ODE staff for personalized assistance at any time.

The Purpose of Title I, Part A

The purpose of the Elementary and Secondary Education Act, reauthorized in 2015 as the Every Student Succeeds Act (ESSA), is to provide all children with an opportunity to receive a fair, equitable, and high-quality education. Title I, Part A of ESSA provides financial assistance to districts and schools who serve a larger population of children from families experiencing poverty. Title I, Part A can be used to support K-12 students, as well as students in preschool (See Appendix D). By providing additional resources, the program is intended to ensure that all students have access to academically enriching curriculum and meet the state's challenging academic standards.

Title I, Part A requirements are established by federal law, federal non-regulatory guidance, and further augmented by state guidance.

Tips for New Title I, Part A Directors

1. [Check out the Formula Grants Expanded Calendar](#), which provides key dates Title I-A coordinators need to track.
2. [Subscribe to the Title I-A listserv](#), which is the primary method used to provide programmatic updates and due dates.
3. **Become familiar with UGG and EDGAR.** The [Uniform Grant Guidance \(UGG\)](#) are rules from the Office of Management and Budget (OMB) that apply to all federal agencies. The [Education Department General Administrative Requirements \(EDGAR\)](#) are the regulations that govern all U.S. Department of Education (ED) grants.
4. **Explore the [Oregon Federal Funds Guide](#).** This document provides an overview of all the grants under the Elementary and Secondary Education Act (ESEA), including requirements, allowable uses, and programmatic resources.
5. **Bookmark the [ESSA Quick Reference Briefs](#).** These high-level overviews are a great place to start to get the basics on a wide range of topics across federal programs.

6. **Review** information contained in your LEA's **Targeted Assistance (TAS) plans or Schoolwide (SWP) plans**. Read your LEA's most recent Title I, Part A Education Continuous Improvement Plan (CIP) Budget Narrative application and supporting materials.
7. **Read your LEA's policies governing Parent and Family Engagement**, data collection and use, professional development (PD), and the dissemination of annual notices to parents/guardians (e.g., Parent/Family Engagement Policy, Parent/Guardian Compacts, LEA/School Report Cards, Parents'/Guardians' Right-to-Know, etc.).
8. **Use the [CIP Budget Narrative Checklists](#)**. These checklists are aligned with the criteria for approving budget narratives for Titles I-A, II-A, IV-A and V-B, and can be used to review narratives prior to submission to ODE.

Organization and Record Keeping

1. **Use this guide** and other resources to develop a calendar and process for collecting information and data throughout the year to ensure compliance and program quality.
2. **Set up your files using the Title I, Part A section of the [ESEA Monitoring Organizational Tool](#)** as an organizational framework. Keep current documents that will serve as evidence for each area.
3. **Keep current copies of SWP and TAS plans** on file at the LEA. Maintain updated lists of students served in TAS programs and preschool programs, including criteria by which students were selected, date of entry into program, date of exit, and reason for exit (e.g., academic exit, moved, dropped by parent/guardian request, etc.).

Technical Assistance

1. **Take advantage of monthly Office Hours and Webinars**. Office hours are a drop in space for district staff to ask questions of their colleagues and ODE's Title program specialists. Webinars are presentations on important and timely topics, with time for Q&A at the end.
2. **Access individualized support by region**. ODE staff provide support for Title I-A in a regional approach. Districts should feel free to reach out at any time with questions.

Program Design

Each LEA's Title I, Part A Director/Coordinator needs to ensure that their Title I, Part A school and district-wide programs focus on high quality, standards-based teaching and learning for public school and eligible private school students.

As outlined in ESSA, schools funded with Title I, Part A may implement one of two approaches:

Targeted Assistance Program

A [Targeted Assistance Program \(TAS\)](#) provides supplemental services to identified children in the school. The program for this model should be based on a Needs Assessment and aligned to overall

school objectives or goals. In general, the program includes how students are identified for the targeted program and how the impact of services and supports will be monitored and assessed. Any school with at least 35% of students experiencing poverty is eligible to operate a Targeted Assistance Program.

Eligibility: The school selects “eligible children” by identifying those who are “at risk or not meeting the state’s challenging student academic achievement standards.”¹ The school makes the determination based on multiple, educationally related, objective criteria established by the LEA and supplemented by the school. **Selection is based entirely on academic needs, not income.**

Program Focus: Supplemental assistance in activities, and academic courses necessary to provide a well-rounded education:

- Supplemental services to identified children
- Based on established criteria
- Research-based practices
- School and community engagement

Service Delivery Model: Provide supplemental assistance to core instruction for identified students. Supports may include, but are not limited to, the following:

- In-class supplemental model (push-in)
- Pull-out small group model
- Before school
- After school
- Extended school year (summer school)

Note: *TAS programs may only serve identified students. Costs associated with the program include, but are not limited to, staff salaries, materials, and supplies.*

Schoolwide Program

A [Schoolwide Program \(SWP\)](#) allows a school to upgrade the entire educational program. Research suggests that in schools with relatively high percentages of students experiencing poverty, students' needs are more widespread throughout the entire school population. Though the school is not required to identify certain children as being eligible for services, the focus of the program must be on addressing the needs of students not meeting state academic achievement standards.

Eligibility: To be eligible to implement a schoolwide program, a school must have at least 40% of its students from families experiencing poverty. Districts can request a **waiver of the 40% minimum** poverty threshold for the upcoming school year. Please contact federalprograms@ode.oregon.gov for more information.

Program Focus:

- Supplemental services
- Based on comprehensive needs assessment

¹ ESEA Section 1115 (c)(1)(B)

- Evidence-based practices
- School and community engagement

Program Plan: An eligible school must first develop a comprehensive Title I, Part A Schoolwide Plan. A planning year is suggested prior to becoming a SWP program. The plan must be developed in consultation with the district and its school support team or other technical assistance providers. It **must** be developed with the involvement of families and other members of the community to be served and the individuals who will carry out the plan, including teachers, principals, and administrators (including administrators of federal programs).

Service Delivery Model: Provide supplemental or additional assistance to core instruction for all students, with a focus on those at risk of not meeting the state’s academic achievement standards. Services and activities could include, but are not limited to, the following:

- In-class supplemental model (push-in)
- Pull-out small group model
- Before school-after school
- Extended school year (summer school)

The SWP model allows the most flexibility in the use of Title I, Part A funds. A Title I, Part A Schoolwide Plan, should include a description of the comprehensive needs assessment conducted for the school. An LEA may operate a SWP in the first year of being served if it assures that a year of planning has taken place. For many schools in Oregon, the school improvement planning process may meet this requirement. In general, at least 40% of students in a school must be experiencing poverty to operate a SWP program, unless a waiver is received from ODE.

Table 1. Comparing Targeted Assistance and Schoolwide Programs

Category	Targeted Assistance (TAS)	Schoolwide Program (SWP)
Who Is Served	Only identified, at-risk students.	All students in the school.
Use of Funds	Provides supplemental academic support for eligible students only.	Improves the entire educational program of the school.
Student Identification	Required—based on multiple academic criteria.	Not required.
Staffing	Only Title IA-funded staff implement the TAS program.	All staff support the SWP; no distinction by funding source.

Planning Requirement	Not required.	Requires a one-year planning process and SWP plan or aligned improvement plan.
Program Focus	Targets academic interventions and services for selected students.	Strengthens instruction, learning time, and equity schoolwide.
Review & Evaluation	Reviews progress of participating Title I-A students.	Reviews the schoolwide plan's impact annually for all students.
Family Engagement	Required under Title I-A.	Required under Title I-A.

More information on SWP and TAS programs can be found on the [Schoolwide and Targeted Assistance Planning webpage](#).

Evidence-Based Practices

ESSA requires states and LEAs to implement programs and practices with a proven record of improving student academic achievement. The resources below can help school and LEA staff in identifying high quality programs and practices.

- [Using Evidence to Strengthen Education Investments](#) (ED Non-Regulatory Guidance 2016)
- [National Center for Education Statistics \(NCES\)](#)
- [What Works Clearinghouse](#) (WWC)
- [Evidence for ESSA](#)

Transitioning from Targeted Assistance to Schoolwide

Under ESSA, Title I, Part A-funded schools operating a Targeted Assistance (TAS) model may transition to a Schoolwide Program (SWP) model. Transitioning to a SWP provides flexibility in how Title I-A funds are used and enables schools to design a comprehensive educational program that serves all students, particularly those at risk of not meeting academic standards.

Why Transition to Schoolwide?

A Schoolwide Program allows a school to use Title I-A funds to improve the entire school program, rather than targeting services only to selected students. This model supports flexibility in funding and services, whole-school alignment, and broader impact.

What's Required for the Transition?

- One-year planning period (unless a recent school improvement plan satisfies this)
- Consultation with partners (staff, families, community)

- Development of a Title I-A Schoolwide Plan
- Title I-A Annual Meeting documentation
- Parent and Family Engagement Plan (reviewed and revised with parent input annually)
- Family-School Compact (reviewed and revised with parent input annually)
- Building Family Capacity documentation
- Verification of staff qualifications
- Paraprofessional highly qualified documentation

For questions about transitioning to a Title I-A schoolwide program, please email federalprograms@ode.oregon.gov.

Evaluation Procedures

ESEA requires that Title I, Part A program plans be regularly monitored and revised ², a process which is typically conducted at the end of each school year and is intended to measure the efficacy and impact of the LEA's Title I, Part A program.

- All aspects of the Title I, Part A program should be included in evaluation of its impact, including academic assistance provided, Parent and Family Engagement activities and effectiveness of related policies, and private school services (if applicable).
- Evaluation data, such as student assessment data and staff and parent/guardian surveys, are used to evaluate the strengths and areas for growth of the program's impact on raising student achievement and productively involving parent/guardians in their children's education.
- The evaluation should include the data used, community partners consulted, process used to arrive at evaluation findings, and how these findings are utilized for planning and improvement.

The following questions are examples to guide program evaluation:

1. Has the Title I, Part A program been effective?
2. What has worked well in the Title I, Part A program?
3. What has not worked well in the Title I, Part A program?
4. How should the Title I, Part A program be refined?

The data are analyzed, and the results of these analyses are used as the source of evidence to determine the answers to the questions above.

- Information is collected in the formative and summative student performance data; surveys; attendance data; and other data from students, teachers, and administrators. Additionally, a program evaluation survey is distributed to all Title I, Part A families in Title I, Part A schools. To the extent practicable, the survey is made available in multiple languages.
- The data are analyzed by the Title I, Part A Director/Coordinator with the assistance of other

² ESEA Section 1114(b)(3)

staff, as needed.

- As necessary and appropriate, the results of the analysis are shared with Title I, Part A staff, Title I, Part A building classroom teachers, principals, LEA administrators, parents/guardians, and other partners to determine necessary and important changes that should be made to the Title I, Part A program to better serve its students.

Requirements to Address Inequity in Teacher Qualifications

Under ESEA Section 1112(b)(2), LEAs are required to identify and address any disparities that result in historically underserved students being taught at higher rates than other students by ineffective, out-of-field, and inexperienced teachers in Title I-A schools.

A Root Cause Analysis can help identify underlying factors contributing to inequitable access to experienced, in-field, and fully certificated teachers. Integrating this analysis into the Comprehensive Needs Assessment process is recommended. Then, LEAs and schools can begin to identify strategies to address the disproportionality in their Title I and improvement planning. Some examples of root causes could include:

- Limited applicant pool
- Hiring/assignment policy gaps
- Lack of endorsement pathways
- Retention issues in high-need areas

Strategies to Address Inequities

The Needs Assessment and root cause findings should inform the selection of **strategies** aimed at eliminating educator access gaps. LEAs are encouraged to choose relevant, sustainable actions that align with their overall improvement plans. Below are some strategies to consider:

Increase Access to Experienced Teachers

- Support job-embedded learning walks or peer observations
- Stipends for teachers to attend instructional rounds/lesson study groups outside the contracted day
- Stipends and release time for mentors and mentees
- Instructional coaching for novice teachers

Increase Access to Fully Certificated Teachers

- Fund endorsements (testing/tuition)
- Partner with state-approved universities for Grow-Your-Own pipelines
- Reimburse teacher certification program costs

Increase Access to In-Field Teachers

- Reimbursement of test fees to add endorsement
- Tuition reimbursement to add endorsement(s)
- Differential pay to attract fully endorsed teachers to high need schools

Increase Access to Effective Teachers

- PD aligned to evaluation outcomes
- Implement co-teaching models in struggling classrooms
- Trauma-informed or culturally responsive teaching PD

Equitable Services

Districts are required to provide eligible children attending private schools, their teachers, and their families with Title I, Part A services or other benefits, such as PD, Parent and Family Engagement (PFE), and materials and supplies (on loan from the public schools), that are equitable to those provided to eligible public-school children, their teachers, and their families.

Resources

- More information on this topic can be found on the [Private School Participation under ESSA webpage](#).
- For a detailed calendar of annual equitable service activities, please see the [Formula Grants Expanded Calendar](#).

Parent and Family Engagement in Title I, Part A

Engaging families as full partners in the education of their children is a cornerstone of ESEA. When families support learning, children are more successful in school. The LEA must provide opportunities for families to be actively involved in the planning, implementation, and review of school and LEA Title I, Part A programs. The district must maintain written school and LEA parent and family engagement policies that are developed and annually re-evaluated with, agreed upon, and distributed to parents/guardians of participating children. Communication with families should occur in the home language of the family, to the extent practicable, and interpreters utilized as necessary.

When	Parent and Family Engagement Activities
Ongoing	• Engage in parent/guardian outreach and engagement and maintain documentation of these activities • Notify parents/guardians when their child has been assigned or has been taught for four or more consecutive weeks by a teacher with limited certification and licensure
August	• Review and update parent/guardian notification materials (Report Card, Right to Know letters, etc.) • Review and revise PFE policies and plans in consultation with families
September	• Hold Annual Meeting (no later than October) • Distribute school report cards • Implement jointly developed School-Family compact outlining how families, school staff, and students share responsibility for improved student outcomes
October	• Send parent/guardian notification of Parents'/Guardians' Right-to-Know • Conduct consultations on the development of the Title I-A policy (LEA and school)

November	• Ensure School-Family Compacts are collected • Ensure school with TAS programs have notified families
April	• Collect feedback on Title I, Part A plan • Review and update School-Family Compact
June	• Review and update school plans and LEA PFE policy based on data, e.g., evaluations, surveys, parent forums, focus groups

Parent and Family Engagement (PFE) Requirements

LEA-Level Required Allocation under ESSA

LEAs receiving a Title I, Part A allocation over \$500,000 must set aside one percent of their LEA's allocation for PFE. At least **90%** of the LEA's one percent set-aside must be distributed to Title I, Part A schools for the purpose of family engagement activities, with priority given to high need schools. This information is entered in the Family Engagement Set Aside section of the CIP Budget Narrative and is shared by ODE with the U.S. Department of Education as part of an annually required data collection.

A LEA receiving less than \$500,000 is not required to set aside funds for Parent and Family Engagement. However, the LEA is still required to meaningfully engage families and provide PFE opportunities at their Title I, Part A schools.

LEA and School Written Policy Requirements

Parents and families of children receiving Title I, Part A services must be involved in the development of the LEA and school PFE policy. The policy must include how decisions regarding set-aside funds are made for PFE activities, and how parents and families will be included in the annual evaluation of the policy.

Each LEA and school that receives Title I, Part A funds must notify parents and families of the policy in an understandable and uniform format, and to provide the notification in a language the parents and families can understand. The policy must be made available to the local community and updated periodically to meet the changing needs of families and the school.

Title I, Part A Parent Notice Requirements

Each year, LEAs and schools receiving Title I, Part A funds must provide certain information to parents and families, and students participating in Title I, Part A programs. For information regarding Title I, Part A parent/guardian notification requirements for LEAs and schools, see Appendix B of this document.

LEA and School Required Strategies and Responsibilities for Building Capacity

Ensuring effective PFE and supporting partnerships among the school, parents and families, and the community, each LEA and school assisted by Title I, Part A funds must:

1. Aid parents/guardians of children served by the school in understanding:

- a. The state’s academic content standards and academic achievement standards,
 - b. State and local assessments,
 - c. The requirements of Title I, Part A, and
 - d. How to monitor a child’s progress and work with educators to improve the achievement of their children.
2. Provide materials and training to help families work with their children, such as literacy training and using technology.
3. Work collaboratively with families to support school staff in implementing the following:
 - a. How to reach out, communicate, and work with parents and families as equal partners.
 - b. How to implement and coordinate parent and family programs.
 - c. How to build ties between parents and families and schools.
4. Ensure that information related to school and parent/guardian programs, meetings, and other activities is sent to the parents and families of participating students in a format and in a language the parents/guardians can understand.
5. Provide reasonable support for PFE activities that parents and families may request.

Family and Student Partnerships in Title I, Part A

Incorporating parent and family engagement and feedback is a requirement under ESEA for policies, plans, and School-Family compacts. However, the primary focus for LEAs and schools should be to build lasting, trusting relationships with families and their students. The [Dual Capacity Framework](#) serves as a compass, emphasizing the importance of fostering a foundation of respect and trust between home and school, established upon mutual trust.

Building Capacity

Building strong school/family partnerships requires building the capacity of both families and educators. A report from the Carnegie Foundation published in 2025, [Family Engagement in Action: A Roadmap for Building Authentic School/Family Partnerships](#), draws on a two-year collaboration between 10 grantee organizations and the Center for Public Research and Leadership at Columbia University. Learnings from this collaboration include:

- Capacity building is most effective when there is a focus **on building safe, supportive communities for learning and collaboration** among participants across multiple, in-person sessions.
- Building safe and supportive communities—particularly for families—also means **using inclusive practices for participation**, including (a) communicating, sharing materials, and holding sessions in preferred languages, (b) providing opportunities to engage through multiple modalities (e.g., in person and virtual) and at convenient times, (c) meeting in a safe environment, (d) providing transportation or childcare, and (e) providing opportunities that are responsive to different learning or contribution styles.

- Organizations also found success when they **embedded opportunities for practice**, like role playing, into sessions.
- Capacity building is effective when participants are provided with **clear assignments that they can implement right away** to see positive change.
- Capacity building works best when **facilitated or cofacilitated by peer parent leaders or educators**.

Capacity building for families is most helpful when it focuses on:

- Understanding **how to navigate the education landscape** (i.e., who to talk to, how to be involved, what resources are available).
- Affirming families' role as **partners and advocates** for their children.
- Building skills and confidence to **engage with educators and leaders** in supporting learning.
- Developing **digital literacy** to communicate with educators and view student progress.
- Growing skills to **work with their children at home**.

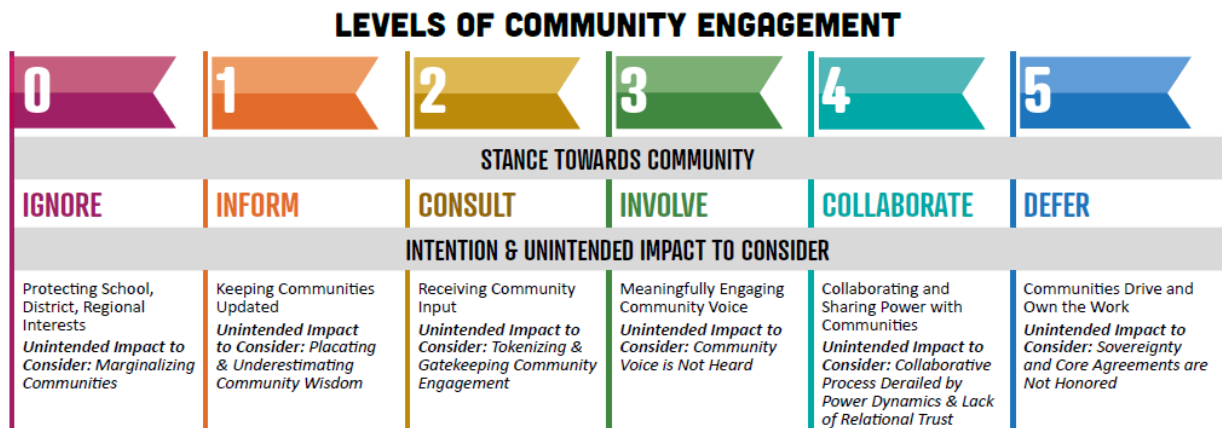
For **educator capacity building**, it is most helpful to build an understanding of:

- What strong school-family partnerships look like and **their value for improving student learning**, using data and real-world examples of success.
- Families' backgrounds and lived experiences, including the **expertise that families have**.
- How to engage in **culturally affirming communication** and practices with families, including how to partner to support student learning.

When schools foster meaningful partnerships with families and students, ensuring that their voices are heard, their ideas are valued, and their concerns are addressed, this collaborative approach leads to more effective and inclusive school improvement efforts.

More information on how to effectively and authentically engage with families can be found in ODE's [Community Engagement Toolkit](#). This framework serves as a tool to assess, reflect, and deepen engagement in Oregon communities. It is organized (Figure 1) on a spectrum of minimal to robust (Levels 1-5).

Figure 1



Parent and Family Engagement Allowable Costs

LEAs and schools must provide a broad range of services designed to help parents/guardians help their children succeed at school. The activities allowed under the PFE provisions of Title I, Part A are generally linked to:

- Academic goal(s) or academic standard(s).
- Education and training (staff and parents).
- Participation in school-related meetings.
- Inclusion in the education of their children.
- Removing barriers for greater participation, so families can attend intentional activities that are linked to achievement.

In some cases, providing food or light refreshments may be allowable as part of a PFE activity, if it is both:

- Reasonable and necessary (see fiscal section in this guide for a list of guiding questions), and
- Directly related to the success of the activity.

Providing food or beverages may be allowed under the following conditions:

- The PFE event occurs during a typical mealtime, or there is evidence that family attendance would be significantly impacted without food/snacks, and
- The activity is clearly aligned with the school's goals and the purpose of the Title I, Part A program.

This aligns with the U.S. Department of Education's guidance that food costs may be allowable when they are necessary to achieve the objectives of the grant (see [U.S. Department of Education's August 2024 FAQ](#)).

Note: Food purchases should not be included in indirect costs and must be treated as direct costs to the grant.

Additional Guidance

- Food costs must relate to school improvement and family engagement plans.
- Snacks/light refreshments for events that have a purely social and/or entertainment focus are **not allowable** (e.g., banquets or celebrations).
- Food may not be provided for remote meetings or routine staff meetings.
- Federal funds may never be used to purchase alcohol.

Resources

- More information on this topic can be found in [ESSA Quick Reference Brief: Family Engagement under Title I-A](#).
- For a detailed calendar of annual parent and family engagement activities, please see the [Formula Grants Expanded Calendar](#).
- The following resource from the U.S Department of Education offers technical guidance on implementing [Title I, Part A parent and family engagement requirements under ESSA](#).
- [Family Engagement In Action: A Roadmap for Building Authentic School/Family Partnerships](#)
- [ESSA Quick Reference Brief: Purchasing Food with Federal Funds](#).

Fiscal Procedures

Effective fiscal management is critical to ensuring Title I, Part A funds are used appropriately, transparently, and in alignment with federal requirements. This section provides an overview of essential fiscal responsibilities, including documentation of expenditures, time and effort reporting, budget amendments, comparability, and compliance deadlines. Directors/coordinators should collaborate closely with fiscal staff and maintain thorough records to support audits, monitoring, and programming integrity.

For a detailed calendar of annual fiscal activities, please see the [Formula Grants Expanded Calendar](#)

Time and Effort Requirements for Federal Programs

All employees paid for with federal grants must document the time they spend working on the grant's objectives to demonstrate that the amounts charged to federal programs are accurate. This includes both full-time and part-time employees. **Time and effort is not based on how you are paid (funding source), but on the work that you do (cost objectives).** A cost objective is a set of work activities allowable under a particular funding source or sources.

Regardless of whether an employee works on a single cost objective or multiple cost objectives, time and effort documentation should:

- reflect an after-the-fact documentation of the activity of the employee;
- account for the total activity for which each employee is compensated;
- and be affirmed by the employee and/or supervisory official having firsthand knowledge of the work performed by the employee.

Districts should have stronger controls to allocate salaries for employees working on multiple cost objectives, rather than single cost objectives. Accordingly, for employees working on multiple cost objectives, districts may want to maintain documentation allocating work among those cost objectives monthly; whereas for employees working on single cost objectives, districts may want to maintain documentation on a semi-annual basis.

Substitutes and Time and Effort

The documentation required for time and effort depends on the length of time the individual is replacing the regular teacher. As a rule, if the regular teacher is gone for a month (pay period) or more, the substitute should sign a time and effort report for his/her activities. If the regular teacher is gone less than a month, the teacher's signature on the time and effort report is enough to cover both the substitute and regular teacher providing the activities of the position did not change for the period the substitute worked. If the activities differed, the substitute must sign the time and effort report.

Administrators and Time and Effort

Federal program directors may charge time to federal programs if they maintain monthly time and effort documentation reflecting actual time worked on each federal and state program under their supervision. Administrators are considered a core service provided by the district and generally may not charge time to federal awards.

The only exception is when an administrator has specific program administration or direct student service duties **and** documents actual time spent in the performance of those duties by completing monthly time and effort records. Administrators include:

- Superintendents
- Assistant Superintendents
- Building Principals
- Assistant Principals

More information on this topic can be found in [*ESSA Quick Reference Brief: Time and Effort*](#).

Food for Meetings and Conferences

Title I, Part A funds may be used to support meetings, conferences, and related expenses only when such costs are reasonable, necessary, allocable, and allowable under federal guidance. Food and beverage purchases are not generally considered allowable unless there is a strong justification tied to the objectives of the grant.

More information on this topic can be found in [*ESSA Quick Reference Brief: Purchasing Food with Federal Funds*](#).

Reasonable and Necessary

Reasonable and Necessary costs mean spending wisely to meet your program's goals without

overspending. [2 CFR 200.404](#) of the Uniform Grant Guidance (UGG) provides the federal definition of “reasonable”. Some questions to keep in mind to guide decision-making on this topic include:

- **Is it Necessary?** Does this purchase help meet the program’s goals or requirements?
- **Is it Practical?** Could a lower-cost option achieve the same result?
- **Is it Comparable?** Does the price match what others in your area would pay for the same item or service?
- **Is it Responsible?** Are you being mindful of public funds and using them effectively?
- **Does it Follow the Rules?** Does it align with your school or district’s policies?

More information on this topic can be found in [ESSA Quick Reference Brief: Determining Allowability](#).

Data Collection and Reporting

Districts are required to collect and submit data each year related to the outcomes achieved through federally funded programs. Timely and accurate K–12 data is critical for improved education planning, policymaking, management, and outcomes.

Consolidated District Performance Report (CDPR)

LEAs must report the numbers of students served in instructional programs funded by Title I, Part A, during the previous school year. ODE uses the Consolidated District Performance Report (CDPR) to meet this requirement. Districts report all students served in TAS as well as SWP programs. ODE staff provide annual training to LEAs on the CDPR collection as well as a User Guide and other materials. Resources related to the CDPR collection, including how to submit the collection, are updated annually and can be found on the [Title I-A District-Level Resources web page](#).

Comparability Report

Congress added a “comparability of services” requirement to the Title I-A program shortly after it was created to ensure that the resources that Title I provides are added on top of an equitable base of state and local resources provided to both Title I and non-Title I schools. Districts demonstrate their compliance with this requirement through submission of the Comparability Report by December 1 of each year, however, **LEAs that have only one school per grade span are exempt from submitting the Comparability Report.**

Options When Calculating Comparability

Districts have several options for demonstrating comparability:

- Student-Instructional Staff Ratio
- Student-Instructional Salary Ratio
- Per Pupil Expenditures
- Resource Allocation Plan based on Student Characteristics

Any decisions need to be applied consistently across all schools and grade spans. If enrollment varies significantly within grade spans (e.g., if enrollment at the large schools is twice that of the small schools),

the district can choose to group schools by size (small, medium, large).

When demonstrating comparability, an LEA may exclude state and local funds expended for:

- Language instruction educational programs.
- Excess state and local costs of providing services to children experiencing disabilities, as determined by the LEA.
- State or local supplemental programs in any school attendance area or school that meets the intent and purposes of Title I, Part A.

When a building is shown as Not Comparable, adjustments must be made. If this occurs, LEAs should reach out to ODE to discuss their options.

Resources

- More information on this topic can be found in [ESSA Quick Reference Brief: Demonstrating Comparability](#).
- Resources related to the Comparability Report and how to submit can be found on the [Title I-A District-Level Resources web page](#), including a [sample timeline for determining Comparability](#).

Title I, Part A Allocations

Title I-A grants are formula-based funds for LEAs. Preliminary allocations are provided to State Education Agencies (SEAs) in the spring prior to the fiscal year for funds. In turn, ODE typically provides these preliminary allocations to districts by March. Each year, LEAs that are eligible for funds must apply and budget for the use of Title I funds through the CIP Budget Narrative.

Consultation

Title I-A Directors should use the amount provided in the preliminary allocations to meet with key partners to determine how funds will be used to support district and school needs in the upcoming school year. These partners should include, but are not limited to, the following:

- **Administrators of Other ESEA Programs** – Plans for the use of Title I-A funds should be coordinated with other federal, State, and local resources to ensure that resources are utilized in the most effective manner (e.g., McKinney-Vento liaisons, migrant programs, programs for neglected or delinquent youth, programs for English learners, etc.)
- **School Leadership Teams** – Principals and teachers should be included in decisions regarding the use of individual school allocations as well as district reservations.
- **Parents/Guardians** – LEAs must involve parents/guardians in the development of district and school planning for the use of Title I-A funds including the development of family involvement policies and/or plans.

- **Private School Officials** – LEAs must consult with private school officials during the development of the Title I-A plan to inform private schools of ways that federal funds can provide equitable services to students attending private schools.
- **Tribal Nations** - Consultation requirements under section 8538 of the ESEA require affected LEAs to consult with Indian tribes (or those tribal organizations approved by the tribes located in the area served by the LEA) prior to submitting a plan or application for “covered programs”. Because the CIP Budget Narrative for Title I-A reflects the district’s plan for funds, **approval of CIP Budget Narratives for affected LEAs is contingent on submission of the affirmation of tribal consultation and tribal consultation worksheet.** More information on “affected” LEAs and [Tribal Consultation can be found here.](#)

District Set-Asides

Prior to determining school allocations, Title I-A funds must be reserved at the district level.

Required Set-Asides

All LEAs must reserve funds to provide services to **all** students navigating housing instability, **regardless of whether the eligible student(s) attend a school receiving Title I, Part A funds.** (See Appendix C) These activities, initiatives and planned expenses must be designed to remove barriers to engagement and participation in education for unhoused and unaccompanied youth.

Additional required set-asides include:

1. Parent and Family Involvement (minimum of 1% for districts whose allocation is over \$500,000); and
2. Equitable Services (only for districts with participating private schools.

Optional Set-Asides

The LEA may also reserve funds at the district level for allowable district-wide activities, such as professional development, preschool programs, and Title I-A instructional initiatives. Since district reservations impact Title I-A school allocations, Title I-A schools must have an equitable opportunity to participate in district-wide activities. Districts may also reserve funds for administrative costs such as the director’s salary and administrative support.

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.

More information on this topic can be found in [ESSA Quick Reference Brief: Set-Asides under Title I-A.](#)

Selecting Schools

An LEA must first rank **all** its schools according to their percentage of students navigating poverty. Schools must be ranked in order from highest percentage of students navigating poverty to lowest. A school must be at or above 35% poverty to be eligible to be served.

Ranking and Serving

All schools above 75% must first be served (i.e., provided with an allocation) unless comparable services can be demonstrated, prior to serving any schools below 75% poverty. Once schools above 75% have been served, the LEA has the option to:

1. continue serving schools in the district-wide ranking or
2. serve schools in rank order by grade span groupings (e.g., K-5, K-8, etc.).

Note: An LEA may stop in rank order at any point it chooses (e.g., serving only the first ten of a total of 16 schools in the LEA, serving only schools above a certain percentage of poverty.)

Criteria for Skipping a “School” (Elect Not to Serve)

In limited circumstances, LEAs may elect not to serve a school (commonly referred to as “skipping”) if the following **three conditions are met**:

1. **Comparability:** The school must meet Title I, Part A comparability requirements under ESEA Section 1118(c).
2. **Supplemental Funding:** The school must receive comparable supplemental funds from other funding sources that are “Title I like”.
3. **Equity of Funds:** The funds expended from these sources must be **equal to or greater than** the amount the school would have received under Title I, Part A.

If these conditions are not met, the school may not be skipped and must receive Title I, Part A, services in rank order. LEAs considering skipping a school should reach out to ODE to discuss their options.

Determining School Allocations

Once a decision is made on which schools to serve, an allocation is determined for each school. There is no specific total amount required, but each school must receive enough funds to effectively operate a Title I program.

Calculating the Per-Child Amount (PCA)

After set-asides are deducted from the district allocation, the remaining amount of Title I-A funds is divided among the schools that will be served. Each school’s allocation is determined by its PCA, which is completed on the Targeting Page of the CIP Budget Narrative application.

1. For **ALL** schools, enter the:
 - Total School Enrollment
 - Public School Poverty Count
 - Private School Poverty Count
2. Using this data, the application will automatically populate a poverty percentage for each school.

3. Enter the PCA for each school. The application will automatically calculate the allocation based on the PCA entered.

REMINDER: Schools over 75% must be served in rank order, regardless of grade span. **These schools cannot receive a lower PCA than any school with a lower percentage of students experiencing poverty.**

If the district selects grade span grouping as the method for serving schools, the district can choose to fund grade spans at different Per Pupil Amounts (PPA).

Note: *The PPA amount for a higher poverty school must be more than or equal to that of a lower poverty school within the same grade span.*

More information on this topic can be found in [ESSA Quick Reference Brief: Rank and Serve under Title I-A](#).

Supplement, Not Supplant

To ensure that funds made available under Title I, Part A are used to provide services that are in addition to the regular services provided by a school district, districts must use these funds to supplement and not supplant regular non-Federal funds.

To demonstrate compliance with the Title I, Part A [supplement not supplant provision](#) for school-level expenditures, districts must annually provide the methodology used to allocate state and local funds to each Title I-A funded school. This ensures that each Title I-A school receives all the state and local funds it would otherwise receive if it were not a Title I-A funded school. **In short, districts must distribute state and local funds to all schools as if no Title I-A funds were available to any schools in the district.**

Once the supplement, not supplant provision is met through the funding methodology and documentation demonstrates that each Title I school received its “fair share” based on the district’s funding methodology, items supported by Title I-A in a targeted or school-wide program are deemed to be supplemental. Complying with supplement not supplant for Title I-A schools is a funding test, not an expenditure-by-expenditure test. School-level expenditures are allowable, provided they are reasonable, allocable, necessary, and appropriately documented, once the district has provided a “Title I neutral” funding methodology for schools.

More information on this topic can be found in the document [Supplement not Supplant under Title I-A](#).

Appendices

Appendix A: Carryover Limitation

Title I-A states that (LEAs) may only carry over 15% of the current school year allocation. However, if an LEA can provide sufficient justification that such a request is necessary, LEAs can request a waiver from the ODE. Under federal law, this waiver may only be requested once every three years. This percentage limitation does not apply, however, to an LEA that receives an allocation of less than \$50,000.

Some appropriate uses of carryover funds include:

- Providing extra funding to schools who are serving the highest percentage of students from families navigating poverty, in rank order;
- Using the money for a centralized activity (e.g., Family Engagement, Professional Development);
- Distributing the funds to schools in School Improvement (considering that all with designation/status of sanctions be given equitable access/use of funds); or
- Providing funds for a specific grade span grouping.

Note: *If an LEA requests a waiver for carryover, unexpended funds in required set-asides (e.g., family involvement, equitable services, etc.) must be carried forward and expended for the same purpose in the following year.*

Resources

- [ESSA Quick Reference Brief: Carrying Over Federal Funds](#)

Appendix B: Parents/Guardians Right-to-Know

The federal Elementary and Secondary Education Act requires Title I-A schools to notify each parent/guardian in the school whose child is being taught for four or more weeks by a teacher who does not meet state certification requirement, regardless of whether the teacher is being paid with Title I-A funds. Districts must notify the parents of students attending Title I-A schools that they may request, and the district must provide (in a timely manner) information regarding the professional qualifications of students' classroom teachers including, at a minimum, the following:

1. Whether the teacher has met Oregon qualifications and licensing criteria for the grade levels and subject areas in which the teacher provides instruction.
2. Whether the teacher is teaching under an emergency license or waiver through which the state qualifications or licensing criteria have been waived.
3. The bachelor's degree major of the teacher and any other graduate certification or degree held by the teacher, and the field or discipline of the certification or degree.
4. Whether the child is provided services by paraprofessionals and, if so, their qualifications.

Communication Considerations

- This notification must be disseminated at the start of the school year (e.g., first 30 calendar days of school).
- The method used to notify parents/guardians must be documented.
- This notification must occur annually.
- **At any point in the year**, timely notice when their child has been assigned, or has been taught for four or more consecutive weeks, by a teacher who does not meet state certification requirements.

Resources

- [Parent Notification Letters](#)
- [Quick Reference Brief: Teacher Requirements under Title I-A](#)
- [Quick Reference Brief: Paraprofessional Requirements under Title I-A](#)

Appendix C: Coordination of Title I-A Programs with Homeless Education

Each year, Title I-A programs are required to set aside funds to meet the educational needs of children and youth navigating housing instability in their school district. This information is entered in the Homeless Set Aside section of the Title I-A CIP Budget Narrative and is shared annually by ODE with the U.S. Department of Education as part of a required data collection. The funds may support additional tutoring services for these students in both Title I and non-Title I schools, as well as in shelters and hotels or motels where families live. The funds may also be used to remove barriers students face to enable them to participate fully in educational activities. The funds should not be used for items such as rent, utilities, or clothing for parents.

Each year, the Title I coordinator and local McKinney-Vento (MV) liaison should work together to determine an appropriate amount for funds to be reserved for students navigating housing instability. Data for these students should be reviewed to address the following questions:

- How many students navigating housing instability were enrolled during the past year?
- How many of these students attended non-Title I schools?
- What are the greatest unmet educational needs of these children and youth in the district?

Once these questions are answered, the Title I-A coordinator and McKinney-Vento liaison should identify activities to meet student needs and determine the amount for the Title I homeless set aside, keeping in mind that activities should supplement and not supplant those that are required by the school district. Additionally, it is considered best practice to include district staff responsible for transportation in this process.

Possible methods for determining the set-aside include:

- Using an assessment of the needs, as well as the number of students navigating housing instability 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, or
- Matching the amount of Education of Homeless Children and Youth (EHCY) subgrant dollars received by the LEA, if applicable.

The Title I coordinator and MV liaison should coordinate to track and manage the set-aside throughout the school year to ensure funds are spent appropriately. Include other district staff as needed.

Resources

- [Title I-A Homeless Set-Asides District Needs Assessment & Calculation](#)
- [Oregon Department of Education McKinney-Vento webpage](#)
- [ESSA Quick Reference Brief: McKinney-Vento and Title I, Part A](#)
- [Serving Children and Youth Experiencing Homelessness under Title I-A](#)

For questions about homeless education and the McKinney-Vento Act, please contact the Statewide Coordinator for Homeless and Unaccompanied Youth at or-mv@ode.oregon.gov.

Appendix D: Title I, Part A Preschool Programs

Since the enactment of the Elementary and Secondary Education Act (ESEA) in 1965, preschool services to eligible children have been an allowable use of Title I-A funds. Providing enriching early childhood experiences can help ensure that children in Title I-A schools and programs have the foundation to meet academic standards and experience success throughout elementary and secondary school. When preschool is high-quality, it may prevent the need for remediation by addressing children's educational needs early.

Funding Preschool Programs

Oregon LEAs are permitted to fund preschool programs for children who are younger than five by August 31 with Title I-A funds under three models:

1. **An LEA** may reserve an amount from its total allocation to operate a preschool program for eligible children in the district as a whole or for a portion of the district;
2. **A Title I-A school** may use a portion of their Title I allocation to operate a preschool program; or
3. **An LEA or school** may use Title I-A funds to improve the quality or extend the day or number of days of state-funded preschool (e.g., Oregon Prenatal to Kindergarten, Preschool Promise), Head Start, childcare, or other community-based early learning programs for eligible children.

Eligibility

Eligibility status for Title I-A preschool services may be either as a Schoolwide (all children in the attendance area of the school) or as a Targeted Assistance Program for preschool children in the district who are failing or at risk of failing to meet the state's achievement standards.

Preschool children served in a Targeted Assistance Program are selected based on multiple, educationally related and objective criteria established by the LEA, parent/guardian interviews, teacher recommendations, and developmentally appropriate measures. **Selection is based entirely on academic needs, not income.**

Curriculum

Title I-A preschool programs must ensure that those services comply, at a minimum, with the [education performance standards in effect under the Head Start Act](#). Additionally, alignment to [Oregon's Early Learning and Kindergarten Guidelines](#) is strongly recommended.

Resources

- [Non-Regulatory Guidance on Serving Preschool Children Through Title I-A](#)
- [Expanding Opportunities to Support our Youngest Learners](#)
- [Oregon Department of Early Learning and Care](#)
- [ESSA Quick Reference Brief: Serving Preschool Children through Title I-A](#)