

American Recovery and Reinvestment Act Questions on Title I funds available through ARRA

General

Q. What does ARRA mean? Is that the stimulus money?

A. ARRA stands for American Recovery and Reinvestment Act. Yes, it is sometimes called the stimulus funds.

Q. When will we have a Live Meeting again? Will we discuss Consolidated Application information this spring?

A. We anticipate a series of Live Meetings for the consolidated application, similar to those we provided last year. A joint Live Meeting with Title I and Special Education regarding the ARRA application via the eGrant will be held when the application is ready.

Ann Larsen and Diane Lowery will be hosting a Live Meeting regarding “Implementing RTI Using Title I, Title III, and CEIS Funds” with the session to be repeated. One meeting will be on May 5th in the afternoon and the other on May 5th in the morning. Watch for the meeting invitation to be sent out via email.

Application

Q. Who should be involved in making decisions about the use of ARRA funds?

A. Districts should look at data to determine the needs of students at their schools and consider how Title I services could best be provided within the district. Document planning efforts and include board members, community members, and parents along with teaching and administrative staff representing all grade spans when making decisions about how these funds will best be used in the district to help students most in need. The district’s Title I Parent Advisory Council must be consulted. Districts must be transparent in their decisions and use of funds under ARRA and will be held accountable for these funds.

Q. Will the new money be included in the consolidated application?

A. Application for ARRA funds will be a separate application in the egrant system -- with minimal questions in the narrative section and the usual budget summary and details section. We are looking at a very brief application that would require the use of funds to be noted with a corresponding budget. The specifics of your Title I program would be included in the regular consolidated application for 2009. Keep in mind that DOE cannot issue any federal funds without an approved application. USED has made it clear that these funds must be

tracked separately; funds are provided with a focus on transparency and accountability. The ARRA application will be tied to the regular consolidated application for 2009-10 as ARRA Title I funds are considered as federal FY09 funds.

Q. Any information about the Consolidated Application at this point?

- A. Preparations are well underway for the application for Title I funds through ARRA as well as with the consolidated application for the 2009-10 school year. Both applications are expected to be available no later than May 1st.

The program narrative document for the 2009-2010 consolidated application has been posted at: <http://doe.sd.gov/ofm/grants/LEAapp/index.asp>

Changes in the document from last year' app are in red font. Minimal changes have been made but clarification has been provided in the blue italicized text that provides specific information about what is expected in the answer.

There are steps that each district can take prior to the egrant being made available. We suggest that the following tasks be completed during the next few weeks in preparation for completing the egrant when it is opened up for review and revisions.

1. Read through the printed copy of the current 2008-09 consolidated application. Highlight all dates and names that will need to be changed. Check for clarity of the information in each answer, grammar, and sentence or paragraph structure. Soliciting the help of the district's Language Arts teachers for this task might be helpful. The consolidated application is a public document available upon request by district stakeholders and media.
2. Consider the blue italicized text to ensure that answers are accurate and address each of the bullets. Note the changes made in this year's program narratives and address as necessary.
3. Have the Title I school principals and teachers review the school-level sections of the current consolidated application to ensure that both targeted assistance and schoolwide sections are accurate and reflect practices that will be employed for next year.
4. Convene the district's Parent Advisory Council to discuss use of both the additional funds available through ARRA and the regular allocation of Title I funds.
5. Convene the Consolidated Application Committee for a preliminary discussion of how the additional Title I funds will be used in conjunction with the current Title I program.

Taking these steps will speed up the process for the district once the egrant is available.

Fiscal

Q. Are the ARRA figures for Title I over 2 years?

Q. Did I hear that we have a 30 month window to utilize the funds? If this is the case, how can this be managed given the 15% maximum carryover limit if we want to establish programs over the course of two years?

A. Yes. ARRA Title I funds are considered part of the LEA's SY 2009-10 allocation and is available for obligation until September 30, 2011. However, the 15 percent carryover limit applies to this allocation, so unless the LEA is granted a waiver, the LEA must obligate at least 85 percent of its total SY 2009-10 Title I, Part A funds by September 30, 2010. The SD DOE anticipates that it will waive this requirement for eligible LEAs that request a waiver.

The SD DOE may waive the 15 percent carryover limitation for an LEA once every three years if (1) it determines that the LEA's request is reasonable and necessary; or (2) a supplemental appropriation under Title I, Part A becomes available. Title I, Part A ARRA funds are a supplemental appropriation under Title I, Part A.

The SD DOE intends to apply to US ED for a waiver to the provision of the ESEA prohibiting the State from granting a waiver of the carryover limitation to an LEA more than once every three years.

Q. When will the 2009-2010 Title Allocations be available?

A. Preliminary Title I allocations are available April 16, 2009 with final allocations to come later.

Q. At the time of application for ARRA funds, is this the time we will indicate the actual use of funds?

A. Yes, it is expected that the LEA will provide a projected budget of how the LEA plans to use the ARRA funding. The LEA will be allowed to amend this budget if its project plan is revised.

Q. If I have not been able to fund my total Title I program with Title I dollars and have used district local funds to pay for some of the Title program, can I use the Title I stimulus money to fully fund the Title I program instead of the local funds?

A. Yes, if the activities paid for with local funds are allowable under Title I, Part A and consistent with all Title I fiscal and programmatic requirements. This means, for instance, that a teacher formerly paid from non-Federal funds must be (1) engaged in activities that are allowable under Title I, Part A; (2) meeting the academic needs of Title I students identified

through a schoolwide program school's comprehensive needs assessment or providing supplemental services in a targeted assistance school; and (3) conducting activities consistent with the LEA's application approved by the SEA.

Q. What is currently known about the Title I funds available through ARRA?

- A. Fiscal guidance has been provided that may answer questions about use of funds. Congress has appropriated funds under ARRA for the existing Title I program. It is our understanding that existing rules and regulations still apply, with a few exceptions as noted in the fiscal guidance document.

Q. I see on the ED website, it now has an invitation for waivers. Should we apply to DOE or ED for these waivers?

- A. Districts are advised to wait on making waiver requests until ED provides additional guidance and a template for waiver requests.

Q. I had asked earlier if we could begin spending the funds as early as June. A better way to have phrased the question would be, what is the earliest we can begin obligating these funds?

- A. Costs are allowable beginning February 17, 2009, the effective date of the grants. As with all Title I funds, expenditures must be for allowable Title I activities consistent with the LEA's SY 2008-09 consolidated application plan that was approved by the SEA.

Q. Will the AARA money be combined with the FY2010 Title I funds?

- A. ARRA funds must be tracked and accounted for separately. However, ARRA funded activities will be considered part of the 2009-10 Title I program as an additional funding source for the district's program.

Q. We have a small rural school that operates a Title I Schoolwide program. Can we use Title I funds to pay the salaries for all of the teachers in the school?

- A. No. In a schoolwide program, Title I, Part A funds and other Federal education program funds may be used only to supplement the total amount of funds that would, in the absence of Federal funds, be made available from non-Federal sources for that school, including funds needed to provide services that are required by law for children with disabilities and children with limited English proficiency. [Section 1114(a)(2)(B)]

It is generally an LEA's responsibility to ensure that the "supplement not supplant" requirement is met and that a schoolwide program school receives all the State and local funds it would receive were it not a Title I schoolwide program school. In other words, an LEA may not reduce its allocation of State and local funds and resources to a schoolwide program school because the school receives Federal funds to operate a schoolwide program.

An LEA should be able to demonstrate, through its regular procedures for distributing funds and resources, that it distributes State and local funds fairly and equitably to all its schools—including schoolwide program schools—without regard to whether those schools are receiving Federal education funds.

Q. Are there exceptions for supplement/supplant for Title pre-school?

A. No. Federal fiscal guidance for Title I ARRA funds addresses supplement, not supplant issues in Section C, pages 28-29.

District Set-Asides

Q. ARRA funds will also be available for private schools and could be used during the summer of 2009. In order for the private schools to get this money, will they need to be active in 2008-2009? In other words, can a private school that is not participating now during 2008-09 school year, join now to get the ARRA monies?

A. The private school could begin participating in the Title I program on July 1, 2009. Equitable participation for children attending private schools is required with ARRA funds. It stands to reason that specific consultation and verification forms will need to be provided for all private schools involved. There would be no prerequisite that the school participated in the program the prior year or that they plan on participating in 2009-10.

Q. Will the 1% parent involvement expenditure requirement be triggered with the additional ARRA money whereby it may take us over the \$500,000 level?

A. Yes, the ARRA Title I funds will be considered part of the 2009-10 allocation when determining required set-asides. If the combined total for the two sets of funds is equal to or greater than \$500,000, the district will be required to set-aside 1% of its combined allocation for parent involvement activities.

Program Use of Funds

Q. Can Title I funding be utilized for 9th grade reading and math assistance?

A. Yes, Title I funds can be used for preschool - 12th grade as long as the particular school is eligible for Title I services. Using Title I funds for 9th grade makes the high school a Title I school so all requirements apply to the school. There has been talk across the nation and by Congress that Title I services should be provided in middle and high schools as there are certainly needs there. However, most Title I funds in the nation are given to elementary schools because there aren't enough funds to give to all schools that are eligible. Things might change a little with the stimulus funds but the efforts may not be able to be sustained.

- Q. Where can Title purchase library books if they can besides the area of Title V that will be no longer next year? We have purchased supplements for our classrooms this year and store them in our library (for instance for classrooms/small groups) and we currently purchase AR tests etc. however we haven't completely purchased all library books out if Title. Is this possible? If so, where?**
- A. If the district is not participating in the REAP, the consolidated application programs generally cannot be used to purchase library books. A Title I schoolwide program could purchase library books for use within the school's schoolwide program, if it is consistent with the school's schoolwide plan.
- Q. How much flexibility will current Title I programs have in creating innovative activities and programs to meet the intent of ARRA funding in the areas of professional development, expanding early childhood education, using reading/math coaches, using longitudinal data systems, establishing sustainable learning opportunities for Title I students, etc.**
- A. ARRA funds are appropriated for the existing Title I program. All Title I rules apply to the Title I funds under ARRA. Professional development can only be used in Title I schools for training relevant to the needs of Title I students for staff with Title I students in their classrooms. Reading and math coaches are considered part of professional development and must operate under those parameters. Early childhood preschool programs can be paid with Title I funds in targeted or schoolwide programs. All purchases, materials, supplies, and equipment must be used only in Title I programs.
- Q. Can we use \$45,000 of ARRA Title I funds to provide an alternative education setting for students in grades 9-12? We estimate the program to provide services to 15 or 20 high school aged students.**
- A. A Title I Schoolwide high school would have flexibility to incorporate such a program into their Schoolwide program. However, a targeted assistance Title I high school would not be able to use the funds in this manner. Title I services must be supplemental to the basic education that is required for all students.
- Q. We are considering the possibility of getting some help for MS - grades 6-8 students in the area of math. Our current K-5 Title I teacher is not certified in MS math. Would we have to hire someone with math certification? Would an aide be out of the question even if he/she were highly qualified? Could another person on staff who is qualified be designated as a Title I teacher of record and manage needs assessment, lesson direction, etc?**
- A. Providing Title I math services to eligible students in the middle school may be what is needed to address a concern identified through your comprehensive needs assessment. This would require that the teacher hired to provide these services to be highly qualified in MS math. A para may not provide instruction. If the person currently employed as a Title I para

is highly qualified to teach MS math, the district would need to hire this person as a teacher, not as a para, to provide this instruction. The current MS teacher that is highly qualified to teach MS math cannot be the teacher of record; that does not apply in a Title I situation. However, if this teacher could provide before, after, or summer school math services, this teacher could be considered the Title I teacher for those extended day programs.

Q. If our district chooses to expand Title I services in a current non-Title I school that is in school improvement, how are Title I sanctions applied?

A. This is a current topic of discussion between USED and state Title I Directors. More information will be provided to districts once this discussion is finalized.

Q. Can student incentives for reading, math, attendance be given using stimulus money?

A. Student incentives must be educational in nature and reasonable. Monetary value should be minimal. Incentives must be tangible and not something that could be turned into cash.

Q. Do RTI programs qualify for Title funds?

A. Title I funds can support RtI interventions. Schools operating schoolwide Title I programs that consolidate funds have great flexibility in using Title I funds to support the RtI program. In targeted assistance programs, Title I funds can be used only to provide interventions for Title I students. Please participate in either the May 4th or 5th Live Meeting on “Implementing RTI Using Title I, Title III, and CEIS Funds”. The use of Title I funds in both schoolwide and targeted programs is covered in the presentation.

Q. Can Title ARRA money be used for any building?

A. No. Title I Part A funds can only be used in schools eligible for and participating in the Title I Part A program.

Use of Funds for Teachers

Q. Can these additional funds be used to fund teachers under Title I?

A. Yes, the additional Title I funds provided through ARRA can be used for teacher salaries as appropriate within each Title I program. The emphasis of the ARRA funds is on employment and creating jobs for families. Title I funds are to be used to provide supplemental support to students at risk of failing reading and math. Highly qualified Title I teachers provide that assistance in targeted programs. In schoolwide programs, all teachers are considered supported by Title I funds and there is more flexibility in hiring highly qualified teachers with these funds.

Some schools have persons employed as paraprofessionals within their Title I programs that are actually certified teachers, highly qualified to provide instruction in the Title I program. The district might consider moving these paras into full time teacher positions within the Title I program, as funding permits. This increases the level of instruction provided to students and allows more flexibility in providing those services within a targeted assistance program.

Title I funds can be used for teacher salaries in various ways. Some districts will receive enough additional Title I funds to hire new teachers into their Title I programs and Title I programs in newly served schools. Others may need to look at other options. Some suggestions to think about include:

- Add Title I duties to existing teachers in Title I schools. One example might be adding a Title I before or after school program. If there are not sufficient Title I teachers to provide that instruction, perhaps the 3rd grade regular education teacher would be willing to be a Title I teacher from 7:30 – 8:30 and the 4th grade teacher from 3:30 – 4:30, 3-5 days a week. Time distribution records would be kept to support paying for the before and after school Title I services with Title I funds. The same kind of scenario might apply to a program before school starts in the fall or for a summer school program.
- If a classroom teacher has a block of time that can be freed on a regular / daily basis from basic education duties, that teacher could assume Title I duties for that period of time. This situation might be helpful in cases where the district does not receive an additional Title I allocation large enough to warrant another full time Title I teacher, but services to students could be expanded.
- Title I funds can be used to provide professional development to Title I and classroom teachers who teach Title I students, if the focus of the training is geared to meeting the needs of Title I students struggling with reading or math. Funds for professional development could include stipends to teachers for participation.

Q. Can the ARRA Title I funds be used to increase salaries for teachers we currently have?

A. Districts receiving Title I Part A funds must established a district-wide salary schedule that is implemented without regard to Title I Part A staffing in eligible schools. (Section 1120A(c) of the ESEA)

Title I funds can only be used for teachers in Title I programs. In a targeted assistance program, only the salaries of the Title I teachers could be increased with these funds. Schoolwide schools must address recruitment of highly qualified teachers. The schoolwide plan could be revised to indicate that Title I funds available under ARRA will be used to as bonuses in the schoolwide program in order to recruit highly qualified teachers. Teacher recruitment or retention bonuses must be reasonable amounts and included as a strategy in the school's schoolwide plan.

ED guidance regarding ARRA Title I funds provides further guidance for Title I schools identified for improvement, corrective action, or restructuring in the following Q & A:

D-5. May an LEA reserve Title I, Part A ARRA funds to provide financial incentives to teachers? Yes. As authorized in section 1113(c)(4) of the ESEA, an LEA may reserve not more than 5 percent of the funds the LEA receives under Subpart 2 of Title I, Part A, including Title I, Part A ARRA funds, to provide financial incentives and rewards to teachers who serve in Title I schools that are identified for school improvement, corrective action, and restructuring for the purpose of attracting and retaining qualified and effective teachers.

Q. How can ARRA Title I fund be used for professional development, and particularly for Response to Intervention (RtI) programs?

- A. Section 1115 for targeted assistance schools and 1114 for schoolwide programs provide information about using Title I funds for professional development. Funds set aside at the district level for professional development must follow the rules for targeted assistance programs. When considering using Title I funds to support professional development for RtI programs, Title I would not be able to pay for professional development related to core instruction, but could pay for Title I teachers and other staff who have Title I students in their classrooms to have training related to interventions for Title I students.

Q. Can Title I recovery money be used to pay ESAs to mentor new teachers?

- A. In a schoolwide program that consolidates its funds, there is great flexibility in the use of Title I funds. Other situations would require caution in the use of Title I funds for this purpose. In a targeted assistance program, Title I funds can be used for professional development (mentoring could be considered professional development) for teachers that have Title I students in their classrooms if the training is focused on the needs of Title I students, such as strategies for reading and math interventions. Title I funds could not be used for training for core curriculum, lesson planning, classroom management, discipline, etc. Mentoring for new teachers is generally more broad-based than just intervention strategies for Title I students.