

# Boulder Valley School District Office of Federal Programs

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**Title I Administrators Handbook**  
2019-2020-2021

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*A Reference Manual for School Principals and Staff  
and District Administrators*



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**1. Current BVSD Contacts For Federal Programs**

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If you find a substantive error in this Handbook (i.e. not a typo), find that something we have written is confusing, or have follow-up questions after reading a section, please feel free to contact any of the Federal Programs staff listed above.

**2. What is ESSA, and What Is Title I?**

ESSA stands for *Every Student Succeeds Act*. This is the current name of the Elementary and Secondary Education Act, also sometimes called ESEA. The US Congress re-authorizes this Act periodically, with different names (previously: *No Child Left Behind or NCLB*).

ESSA is *the* major source of regular *federal* funding to the state education agencies (SEAs) and local education agencies (LEAs, or school districts). Federal funding is purely supplemental: most of the funding for PK-12 education comes from state and local taxes, not federal dollars. ESSA is not intended to pay for basic education.

Each federal budget year, Congress authorizes funding for PK-12 education under the various ESSA “Titles,” which are:

<b>Title I</b>	Improving the <b>Academic Achievement of the Disadvantaged</b>
<b>Title II</b>	Preparing, Training, and Recruiting <b>High Quality Teachers and Principals</b>
Title III	Language Instruction for <b>Limited English Proficient and Immigrant Students</b>
Title IV	<b>21st Century Schools (Well-Rounded, Safe/Healthy Schools, Technology)</b>
Title V	Promoting Informed Parental Choice and <b>Innovative Programs</b>
Title VI	Flexibility and Accountability
Title VII	<b>Indian, Native Hawaiian, and Alaska Native Education</b>
Title VIII	<b>Impact Aid (disaster relief)</b>
Title IX	General Provisions
Title X	Repeals, Re-designations, and Amendments to Other Statutes
Part C	<b>McKinney-Vento Homeless Education Assistance Improvements Act of 2001</b>

- **BVSD receives Title I, II, III, IV and VII funding** each year.
  
- With the exception of Title VII, this funding comes to us through the **Consolidated Federal Programs grant application**, which is administered by the Colorado Department of Education. This grant is not competitive – the amount we receive is pre-determined. We still have to apply for it.
  
- **BVSD** currently receives about **\$2.7 million** in ESSA funding under the Consolidated Grant.

### **3. Who Receives Title I Funds?**

The US Department retains some ESSA funds to make competitive grants for various purposes. These are sometimes available to school districts, and also to state agencies, higher education, research institutes, and private nonprofit organizations. The total amount of funding across the US for ESSA is determined by **congressional appropriation** in the federal annual budget.

However, most ESSA funding under Titles I-A, II-A, III-A, and IV is distributed annually to State Education agencies. The amount that each state receives is based upon formulae that use various factors including total population, population below the federal poverty level, and state funding for education. Much of this data is drawn from the US Census. If you are interested in learning the specifics, link here:

<https://nces.ed.gov/surveys/AnnualReports/pdf/titleI20160111.pdf>

**States are directed to distribute ESSA Title funds to local public school districts in the form of non-competitive ('entitlement') grants** that are pre-calculated by the US Department of Education. These, also, are based upon Census data. **Districts still have to apply** for these funds, and spend the money in compliance with extensive federal laws, regulations, and guidance. In Colorado, ESSA funding to districts is administered by the Federal Programs Division of the Colorado Department of Education, as the "Consolidated Federal Programs Application," or "**Consolidated Grant**".

The Consolidated Grant is prepared and submitted annually. It is an extensive and detailed document, running close to 100 pages. The Colorado Department of Education puts district applications through a multi-step, detailed review, and usually requests changes or clarifications before giving approval, to ensure that all plans and budgets are fully compliant with the law. CDE's process on this is audited by the federal government annually. So CDE may question expenses that are not fully described, or which do not appear to be consistent with ESSA law, regulation and non-regulatory guidance. The Consolidated Grant **application is due to CDE on June 30<sup>th</sup> of each year.**

**School districts receiving Title I funds must direct these funds to serve their highest-needs students.** This may be through some **district-wide initiatives**, but funding must also be directed to serve the **schools with the highest poverty levels.**

Link here to see CDE's Federal Programs Website: <http://www.cde.state.co.us/fedprograms>

### 3. How Is Title I Funding To Schools Determined?

- **The schools to be served and the amount of funding to each school is determined by the school district. Funded schools and funding amounts are not arbitrary, but must be based on the number of low-income students enrolled in each school.**
  
- In BVSD, we use the October count **Free and Reduced Lunch count** to determine low income status. Under the law, other measures may be used (TANF, Medicaid, Census), but FRL seems to result in the most accurate picture. For consistency from year-to-year, we always use October count numbers.
  
- School eligibility for Title I is based upon the **percentage – not number – of FRL students** enrolled at October count.
  
- **Schools must be served in rank order of poverty level.** As a rule, Title I cannot serve schools that have less than a 35% poverty level.
  
- A school district may use a limited number of additional criteria to establish school eligibility for Title I – for example, grade span grouping. Districts may use a threshold that is higher than 35%. However, any school that has greater than 75% poverty must be served.
  
- The amount of funding that each school is allocated under Title I is based upon this FRL **headcount, multiplied by a per-pupil amount** that is determined by the district, but which cannot fall beneath an amount that the state agency would deem adequate to have impact on students.
  
- The per-pupil amount and therefore also school funding are determined **AFTER** the district has budgeted for mandatory **set-asides**, and for **district-managed programs (DMA)**. The mandatory set-asides are (currently):
  - Parent Engagement,
  - Neglected Institutions (residential mental health/drug treatment programs),
  - Eligible Non-public Schools, and
  - McKinney-Vento (homeless student services).
  
  - Optional set-asides include Family Literacy and Preschool.

**5. Example: Ranking of Schools and Amounts to Schools**

- Schools must be served in rank order, according to the percentage of students who are FRL.
- A district may give the same amount per pupil to all schools, or give more funding per pupil to high poverty schools, but can never give more money per-pupil to a lower poverty school.
- Per pupil amounts for public schools are determined AFTER the district has satisfied mandatory set-asides for parent engagement and McKinney-Vento, and after district-managed programs are funded.

- Simplified Example: Smith County School District receives a Title I grant of \$1 million and has 5 Title I schools. The district’s spending will look something like this:

District set-aside Parent Engagement	\$ 5,000
District set-aside McKinney-Vento	\$ 50,000
Administration	\$ 50,000
<u>District-managed After-school Tutoring*</u>	<u>\$150,000</u>
Subtotal	\$205,000
Balance to schools:	\$745,000

Total Number of FRL students in Title I schools:	1,000
Per Pupil Amount (Balance ÷ FRL students)	\$ 745

Funding Allocations to Schools (in rank order)

School Name	Total Enrollment	FRL Enrollment	FRL Percentage	Per Pupil Amt	Funding Allocation
School A	60	55	92%	\$745	\$ 40,975
School B	400	320	80%	\$745	\$238,400
School C	400	250	70%	\$745	\$208,600
School E	510	245	48%	\$745	\$182,525
School D	250	100	40%	\$745	\$ 74,500
<b>TOTAL</b>					<b>\$1,000,000</b>

Notice that the school with the highest poverty, School A, does not get more money than school E, which has only 40% poverty, because the amount is determined by multiplying the FRL enrollment by the per-pupil amount. School E still has more poverty students, and therefore receives a larger share of the total.

\* Under Title I regulations, even though this program is ‘district-managed,’ services can be provided only to students attending Title I schools.

## 6. How Title I-A Funds May Be Used

Under ESSA, Title I funds can support a wide range of activities. ESSA directs schools and districts to use the funds to **improve student outcomes**, including academic achievement, but does not restrict this to the old ‘remediation’ and ‘reading and math only’.

The major caveat to this is that **Title I programming must be supplemental** to the core, basic instruction and services that the district and school provide to every student.

**Subjects** such as English, reading, language arts, writing, science, technology, engineering, math, foreign languages, civics and government economics, arts, history, geography, computer science, music, career and technical education, health, PE, and any other subject that provides a well-rounded education, may be supported. **Additional teachers/staff or external providers** may be paid to provide supplemental instruction and/or services; **extra materials** are also allowed.

**Title I** can pay for **interventions, supplemental curricula, and extended time for learning**, such as after-school, before-school, summer and weekend programming. Credit recovery, accelerated learning, blended learning, online instruction, dropout prevention and re-engagement, career and technical education, and dual credit programs are all possible. Title I can pay for special events and field trips for students, provided they relate directly to student needs and outcomes.

Title I can be used to pay for improvements to **academic supports** such as libraries, media centers, technology, assessments (provided they are not the state-mandated annual tests, e.g. CMAS, PARCC, SAT), diagnostic procedures, and progress monitoring. Alternate language texts, native language tutors, and interpreters can be supported.

Title I can be used to develop **behavioral programs**, including those that promote attendance and socio-emotional learning. Extra counselors or other behavioral specialists may be employed. ESSA allows programs that improve school climate, reduce discipline and bullying, and address culture,

**Professional development** for teachers, administrators and/or staff may be supported by Title I. Training should address the needs identified in the school’s data review and needs assessment. CDE frowns on one-shot, single-day training that is not strongly connected to job-embedded PD. Funds may be used to give faculty time to review student data and assessment results, and work together collaboratively.

Programming for **parents and families** is specifically required and encouraged. This can include community liaisons, home visits, special events, parent education, family literacy (ESL, ABE, etc). Title I can pay for child care, translators/interpreters, and reasonable amounts of food to enable parents to attend events.

By category, Title I can be used for:

- **Staff salaries and benefits (instruction, support and PD)**
- **Supplies/materials (supplemental texts, software, classroom materials, PD supplies, etc.** Note that chromebooks are considered supplies because they cost less than \$5,000 per unit.)
- **Contractual services (consultants, PD tuition/fees, external providers, trainers, etc.)**
- **Local travel (staff or students) (mileage, meals, hotel)** National travel requires special permission.

**Equipment** Is rarely included or approved for Title I, but may be funded based upon need, impact, relevance, et.

## **7. Limitations on Certain Costs, and Costs That Are Never Allowable Under Title I-A**

- Under Title I, a district cannot spend more than 10% of their total allocation on administrative expenses, including indirect costs.
- A school district is not allowed to spend more than 20% of the total Title I allocation on district-managed activities.

These limitations reflect Congress' intent that the majority of Title I funds be spent in schools, on services that directly impact children.

### **Federal Title I funds can NEVER be used to pay for the following:**

- Alcohol or recreational drugs
- Advertising and public relations costs, such as promotional items and memorabilia,
  - may be approved if these are motivational items for students, amounts limited
- Advisory Council – payments to people to serve
- Debt service, including mortgages
- Academic Competitions – any costs related to student participation in. See exception below for McKinney-Vento.
- Contributions or donations to OTHER organizations
- Entertainment
  - Except when there is a programmatic purpose AND costs are specifically authorized by CDE
  - Costs for food may be allowed for parent engagement events, but are not typically allowed for professional development or staff meetings, unless the activity occurs during meal times and it is not possible for attendees to go out for food or bring their own
- Fines, penalties, damages or legal settlements
- Fundraising costs, including the salaries of fundraising staff
- Furniture unless non-standard and necessary for specific supplemental instruction
- Investment costs
- Gifts and gift cards
- General costs of governance, such as payments to a School Board or Superintendent
- Goods or services for any kind of personal use
- Lobbying or supporting any aspect of an election, or a candidate for election
- Organizing activities, such as fees to brokers, attorneys, accountants, investment counselors, management consultants, and/or state/local agencies in connection with the establishment of an organization
- Scholarships for students to attend activities/programs where the school/district pays for the participation of any other student
- Selling or marketing costs
- Student activity costs for clubs, publications, intramural activities, recreation, or travel not specifically related to instruction. Class field trips may be allowed when shown as an important part of instruction.
  - Exceptions are made to support the equitable participation of homeless students
- Sports Competitions – any costs related to student participation in. See exception above for McKinney-Vento.
- Tobacco

## 8. Considerations In Determining Allowability of Costs

- Is it an expense that supports the intents and purposes of Title I?
  - Does it primarily address the needs of low-income, ELD, homeless, or otherwise at-risk students?
  - Does it promote positive academic, behavioral, or family *outcomes*?
- Is it reasonable and necessary?
- Does it address a need that can be described objectively, and which has previously been identified through a needs assessment (or is it just something that seems desirable at this moment)?
- Does it connect to the school and/or district's Unified Improvement Plan?
- Can you evaluate the expenditure for positive impact on student outcomes?

**9. Most common examples of costs (in school or district Title I budgets) that may be questioned or disallowed by CDE or BVSD**

- Use of Title I for class-size reduction (i.e. classroom teacher salaries)  
Why: research shows that this is not a high-gain strategy to improve student achievement, unless aggressive enough to reduce class size to less than 16 (elementary) and accompanied by other structured programming (interventions, etc).  
But: If class-size reduction is proposed in order to reduce class size so that interventionist(s), teacher, and paras can implement an MTSS system with individual and small-group instruction for, say, literacy, this may be allowed.
- Purchase of textbooks  
Why: applicant must demonstrate that they are supplemental to the basic texts supplied by the district with curriculum, and paid for out of state basic education funding (see Supplement Not Supplant, next page)
- Purchase of computers  
Why: applicant must demonstrate that adequate technology does not already exist in the classroom/school; must be used to deliver high-gain instruction/support to at-risk students. May be allowed, but requires justification.
- Use of a paraprofessional to deliver an intervention or specialized support service  
Why: students in need of intervention should be served by the highest-trained individual in the school/classroom; paras are not teachers, counselors or psychologists. May be allowed if the para provides a Tier 1-type service, freeing up the higher-trained staff to deal with Tier 2 & 3.
- Payment of stipends to teachers for participation in professional development when salary credit is offered.  
Why: this is essentially double-dipping and greatly inflates the cost of training.
- Payment of stipends to teachers that are not at a contracted rate.  
Why: this is a fairness issue. BVSD uses curriculum rate for almost all extra teacher time; the exception is a teacher who is not working full-time, in which case, the payment for additional time may be at their regular hourly rate, if the work involves teaching. But do not make up lump sums or hourly rates.
- Payment of high consulting or other contractual fees  
Why: applicant must demonstrate that the hourly/daily rate is in the normal range for the type of work performed. Services over \$25,000 must be put out to bid.
- Any service related to state assessments  
Why: the delivery, data collection and reporting of required state assessments is considered part of a district's basic educational program, which is already paid for by state/local funds. Paying for work on assessments is considered supplanting (see next page). Teachers may be paid for sessions in which they review and analyze data in order to develop instruction.
- Food for students.  
Why: This is because the USDA already subsidizes school meals. If low-income students need a snack or dinner because they are staying late for a Title I activity (such as tutoring or Family Literacy) this may be allowed.

**10. What We Do When An Expense Is Needed, But Questionable For Title I**

BVSD Federal Programs staff maintain good working relationships and communications with the Federal Programs Office at CDE. When an expense is proposed that may be questioned, we call or email them to discuss it before putting it into the Consolidated Grant application, as this might otherwise hold up approval of the entire grant. For this reason, we ask that principals and program directors give us a heads-up when they have something in prospect for Title I that may be controversial. A phone call or email is appreciated.

We do our best to provide a strong justification on behalf of the school or department, and if necessary, will strongly advocate for CDE's approval. But if CDE does not think the expense is acceptable for Title I, we will follow their advice and NOT put it into our application budget. We may work with the principal or program director to try to find other resources to meet the need.

## 11. Supplement Not Supplant

**This is an important provision of EDGAR (the US Education Department General Administration Regulations) that relates specifically to grants. It applies to all federal education grants, at the classroom, school, district, and state level.**

“Supplement Not Supplant” establishes that an education provider receiving a federal grant **may not** use the funding to provide services that are required by federal, state or local law to be made available to all children, or required by law to be provided to children in special categories (economically disadvantaged, children with disabilities, migrant children or limited English proficient children, or homeless), as part of their regular, basic education. The common-sense interpretation of this is that a school district or school must provide all of the services and supports to Title I schools and students that it provides to all other schools and students, and may not use the federal grant to pay for any of these (in essence: playing a ‘shell game’ to supplant the state/local funding, using the offset funds for other purposes). Federal funds may, however, be used to coordinate, expand, improve upon, extend, or otherwise supplement those mandatory educational services.

So in summary, **Title I is to be used for additional services, programs and supports, and other ‘extras’ that are particularly needed by and helpful to low-income and struggling students.**

It does not matter whether those services/supports were previously paid for by another funding source, such as the school district or another grant.

Therefore, Title I cannot be used to pay for Special Education services, because a) the state already provides additional funding for this, and requires additional services to be provided and b) there is another federal grant (IDEA Parts B and C) specifically provided for supplemental SpEd services. That funding takes precedence over Title I when it comes to meeting the additional needs of SpEd students. Special Education students CAN be targeted for Title I-funded services (for example, a literacy intervention), but the Title I services cannot be extra SpEd teachers, paras, aides, assessments, accommodations, etc.

Title I also cannot be used to provide basic ESL or ELD instruction, because the state already requires schools to do this and provides extra funding to each district to provide it.

## **12. Other Important Legal and Fiscal Concepts For Federal Grants**

**Comparability:** This is a fiscal test, applied to ensure that state and local funds are used to provide services that are comparable or greater between Title I and non-Title I schools. A school district may not give a Title I school less staff, materials, funding, etc. because they are receiving federal funding, because that federal funding is intended to increase the total resources at the highest-needs schools. Conversely, a school district cannot provide extra funding, staffing or services to schools that do not receive Title I funding if the same funding/staff/services are not given to Title I schools, because this would throw the comparability off. BVSD must demonstrate comparability annually.

**Conflict of Interest:** A conflict of interest is a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity. The ‘conflict’ is between the person’s professional responsibilities (to do the best thing for the organization) and his personal interests (to do the best thing for him/herself). Regardless of whether a person believe the two criteria to result in the same outcome, a person in this position must remove him or herself from the decision-making.

So..... a staff or board member of an organization receiving federal funds cannot use direct all or a portion of that funding to themselves, or to entities (businesses, organizations or individuals) with which they have a beneficial business or personal relationship. Nor can we establish programs or policies that favor our personal interests. While we can – yes – put our positions in the grant budget to pay ordinary staff salaries for work that is ‘reasonable and necessary’ to fulfill the intentions of the grant, we cannot use grant funds to buy books that we have written, engage our spouse to teach horticulture, or pay an electrician to install wiring so he gives us a break on our personal bill, even if those things seem, in some immediate or distant way, to relate to the grant. Similarly, we cannot direct grant spending toward, say, a school board member, or his/her business, in the hope that they will favor us when it comes to decisions about our school, department or program.

BVSD has procedures that allow the school board to approve employees as providers of goods or services to the school district (i.e. outside their regular job) – this allows the decision to expend funds to be made more objectively, by another party, thus removing the conflict of interest.

**Self-Dealing: Self-dealing** is the conduct of an employee or volunteer who takes advantage of his position in a transaction and acts in his own interests rather than in the interests of the beneficiaries of organization. It is specific term used in accounting and by the IRS and it is a form of conflict of interest. Examples include "working for the school district and using your official position to secure a contract for a private consulting company you own" or "using your position on the School Board to get a summer job for your daughter".

### **Transparency**

Information about any federal grant, and the details of activities and services funded by federal grants, is public. Any member of the public can request a copy of BVSD’s Consolidated Grant application. Data about district and school performance on assessments is available at CDE’s web site, as are annual Unified Improvement plans. The Grants Office therefore advises: *“Never do anything with grant funding that you would not want to have published in the front page of the local newspaper, or discussed on the evening news. When something appears questionable, it probably is, but you can easily resolve the issue by discussing it with BVSD Legal Counsel, Business Services staff, and/or the Director of Grants & Federal Programs”*.

### **Indirect Costs**

“Indirect costs” reflect overhead and administrative costs that can be applied to a grant as a lump sum, rather than detailing each item (e.g. insurance, janitorial, accounting, postage, telephone, security, etc). The indirect cost rate is calculated annually by the US Department of Education specifically to be used in grants and contracts. It is a percentage, based on prior year budgets. This rate is usually around 4-6% for BVSD. Indirect costs are applied to all federal grants.

**13. Who Determines How Title I Funds Are Used?**

The school district is the ultimate arbiter regarding how BVSD spends Title I and other ESSA funds. The school district, in this case, is the Superintendent and Instructional Leadership Team. As is the case with all large grants, the Board of Education must also approve the Consolidated Grant, but sees only a summary, rather than the entire application.

The Colorado Department of Education must approve BVSD’s plan and budget, but does not get to dictate what the district spends, provided our expenses are consistent with Title I intentions and limitations, and bear some relationship to the district’s assessed needs in our Unified Improvement Plan.

All that said, **BVSD asks Title I schools to create their own plan and budget with regard to their own funding allocation.** This allows schools to differentiate their programs based upon site-based needs. This is not the case in all districts – in many, the LEA draws up a uniform plan covering all schools as well as district-managed programs.

## **14. Stakeholder Involvement**

The ESSA contains language requiring school districts to consult with ‘stakeholders’ regarding how Title funds are spent. Specifically, the law says that **an LEA’s application for funds must be “developed, reviewed and revised (as necessary,) in partnership with stakeholders**, and include an examination of the district’s comprehensive needs assessment, and the previous annual evaluation”. Stakeholder engagement is a required for all of the Title programs (I, II, III and IV). This requirement is carried to schools as they prepare their Title I budgets, although to a lesser extent.

Who are stakeholders? This includes (for the district), principals, administrators of related programs, teachers, other relevant staff, parents and families, partnering community organizations, community members, and in some cases, students themselves. For a school, a stakeholders are parents/families, teachers, partner organizations, and as appropriate, students.

How do we discharge this obligation? It is not realistic to recruit special committees made up of people from the groups listed above, just to advise the Consolidated Grant application process. A school district needs broader representation, but can obtain this through committees that already exist for the purpose of reviewing district programs and budgets, and rendering advice. These are present in the District Accountability Committee (DAC), the District Parent Council (DPC), Boulder Valley Education Association (BVEA), and the Teacher Advisory Council (TAC). In addition, the Superintendent, COO and Budget Office hold planning sessions and multiple budget forums throughout the year, many of which any stakeholder can attend, to get and provide information about needs, priorities, and programming.

BVSD also holds a special meeting (consultation) for any member of the public, prior to the development of the grant application each year. This reflects an opportunity for any community member to ask questions and render advice or opinions about any aspect of BVSD’s ESSA funding.

The BVSD Federal Programs web site contains general information regarding BVSD’s Consolidated grant that is available to the public. This site also hosts an ongoing survey form regarding Title funding, which allows anyone, at any time, to ask a question or make a recommendation. The application itself is considered public information; a copy will be provided to anyone who requests it.

Information from these sources and others is analyzed by district leadership as they develop BVSD’s Strategic Plan and annual Unified Improvement Plan, which contain the required “comprehensive needs assessment”. BVSD develops an annual application for the Consolidated Federal Programs grant that is consistent with this.

At the school level, a principal can engage a school leadership team or accountability team to assist in the development of their plan and budget. The plan for Title I spending needs to correspond to the needs, strategies and priority activities discussed in their Unified Improvement Plan. The principal should share information with parents and families through their web site or newsletter, take feedback, and may discuss various aspects of their Title I program with parents at PTA/PTO meetings, coffee hours, or special events (back to school night, Literacy Night, etc.)

### **15. Required Set-Asides in Title I**

“Set-asides” are grant funds that the district must or may reserve for certain required activities, before budgeted district-managed programs or allocating funds to schools. In Title I, the **required set-asides** are:

- **Equitable services to eligible students in private schools**  
The district must develop a program and serve students who attend local private schools that live within a Title I attendance area. Funding is based upon the number of such students who are also low-income (same as public schools). Programs are generally developed using the same per-pupil amount as public schools.
- **Services for homeless children**  
In Colorado, districts must reserve a minimum of \$100 per year for homeless students. The law says we must spend “whatever is required.” In practice, all of the Metro area districts provide much more extensive services. BVSD has had, for many years, at least 500 homeless students enrolled each year.
- **Parent and family engagement**  
1% of the district’s total Title I grant must be spent on parent engagement. Of that, no less than 90% must go to Title I schools. BVSD gives this money to schools on top of the per-pupil allocation.

Title I **optional set-asides** are:

- Early childhood education (BVSD is not currently spending Title I funds on ECE)
- School improvement activities (for low-performing schools) (BVSD is not currently using Title I funds for school improvement. Other grants are available to support this.)
- Family Literacy (BVSD supports Family Literacy with Title I)

## **16. Staffing Requirements in Title I Schools**

The No Child Left Behind Act (NCLB) of 2001 required that teachers in programs supported by Title I, Part A funds be “highly qualified”. The credentials necessary to be considered highly qualified were prescribed by NCLB and included requirements for minimum education, teacher licensure, and subject matter competency. These requirements in NCLB have been replaced by the Every Student Succeeds Act (ESSA) of 2001. ESSA now defers to the states regarding teacher qualification requirements in Title I programs.

Therefore, **teachers and substitute teachers** who are working in Title I SW schools or TA programs must meet all applicable state certification and licensure requirements. Colorado law (*C.R.S 22-63-201*) **requires that a teacher hold a valid license or authorization before they can be hired to teach in a public school, including a charter school**, unless the school or district has received a waiver of this provision from CDE.

Assigning teachers out-of-field or out-of-endorsement is strongly discouraged because the state monitors this relative to the poverty-level of the school and sanctions districts that have many teachers in a high poverty school who are not qualified for all of their assigned classes. We understand that this can be challenging in small secondary schools.

**Paraeducators and substitute paraeducators** assigned to Title I SW or TA programs must continue to meet federal standards under NCLB, which means to be hired they must have:

- (A) completed at least 2 years of study at an institution of higher education;
- (B) obtained an associate's (or higher) degree; or
- (C) met a rigorous standard of quality and can demonstrate, through a formal State or local academic assessment that assures that they have: (i) knowledge of, and the ability to assist in instructing, reading, writing, and mathematics and other subjects as relevant. The receipt of a secondary school diploma (or GED) is required necessary but not sufficient to satisfy (C i)

### **Other ESSA requirements related to staffing:**

- **RIGHT TO KNOW TEACHER QUALIFICATIONS:** All LEAs receiving Title I funds must notify parents of each student attending a Title I school of their right to request information on their child's teacher's qualifications. This is to be done at the beginning of every school year. This is the responsibility of the Federal Programs Office and Title I schools. The Human Resources Department receives parent inquiries and responds to them. Forms to request such information are posted at the BVSD website (Parent section, and also at Grants/Federal Programs web site. If a school receives such an inquiry, it should be forwarded to:

Mike Gradoz, Assistant Superintendent for Human Resources, [mike.gradoz@bvsd.org](mailto:mike.gradoz@bvsd.org), 720-561-5080

- **MANDATE TO INFORM PARENTS IF TEACHER IS NOT QUALIFIED:** Under the ESSA, a school that receives Title I funds must provide timely notice to the parent of any student who has been taught for 4 or more consecutive weeks by a teacher who does not meet applicable State certification or licensure requirements at the grade level and subject area in which the teacher has been assigned. BVSD uses a standard letter to notify parents. This is the responsibility of the Human Resources Department. If a school receives an inquiry regarding the qualifications of an interim or substitute teacher, it should be referred to:

Mike Gradoz, Assistant Superintendent for Human Resources, [mike.gradoz@bvsd.org](mailto:mike.gradoz@bvsd.org), 720-561-5080

## **17. Time and Effort Reporting**

Anyone employed under any federal grant or contract is required to provide periodic verifications that their time is actually spent as represented in the grant and/or contract. For school districts, this is true for Title I, other ESSA grants, and other federal grants such as IDEA Part B.

Time and Effort reporting in BVSD is accomplished via an online system. Employees receive an email notification requesting that they verify their hours and assignment – for most employees, this occurs twice during the school year. The employee must complete the verification promptly.

A few employees have work situations such that their Time and Effort report cannot be completed in the online system. These people are contacted individually by BVSD's Finance and Accounting staff, who assist them in submitting the required information.

It is helpful if school principals let members of their staff who are paid under one of the federal grants know this, and alert them to expect an email asking for their Time and Effort Report.

## **18. Parent Engagement in Title I Schools**

Title I schools are expected to make additional efforts to engage parents in support of their child’s education. The aim is to create bonds of trust, communication, and active support for children between home and school. Title I Parent Engagement needs to go beyond conventional parent-teacher conferences and PTA/PTO meetings, and reach out to under-represented groups (e.g. single parents, immigrants, minorities). Additional funding is provided to support this.

Parent engagement can take many forms, including:

- Extra meetings with individual parents or groups of parents;
- Home visits by school staff;
- Translators or interpreters for regular meetings to enable full inclusion;
- Family learning events;
- Cultural activities;
- Leadership training for disadvantaged parents;
- Parenting education;
- Computer classes;
- ESL classes;
- Educational sessions on supporting literacy, numeracy, second language instruction, etc.;
- Level-to-level transition orientations/support;
- College and postsecondary options workshops;
- Training in behavioral programs;
- Transportation for disadvantaged parents to attend school events;
- Staff support time for any of the above;
- Materials and supplies for any of the above;
- Take home materials for parent-child learning;
- Speakers for parent events;
- Childcare during parent events to enable full inclusion

For additional resources and ideas on best practices in parent and family engagement, the following may be helpful:

<http://www.cde.state.co.us/fedprograms/ti/parents>

<https://www.ed.gov/parent-and-family-engagement>

[https://d1e2bohyu2u2w9.cloudfront.net/sites/default/files/tlr-asset/4a\\_final\\_toolkit\\_without\\_bookmarks\\_370151\\_7.pdf](https://d1e2bohyu2u2w9.cloudfront.net/sites/default/files/tlr-asset/4a_final_toolkit_without_bookmarks_370151_7.pdf)

## **18. Parent Involvement Policy and Compacts**

All school districts receiving Title I funding are required to have a Parent Involvement Policy; BVSD's can be seen here: <https://www.bvsd.org/policies/Policies/KBA.pdf#search=parent%20involvement>.

**Each school funded by Title I must have, in addition, a School-Parent Compact**, which describes how the school and parents will mutually support the education of children. Secondary schools may wish to include students in the Compact. CDE provides a template here: <http://www.cde.state.co.us/rti/familycommunitytoolkit>. This example does not have to be followed strictly – it is the intentions that need to be honored. A simpler example, developed by Whittier Elementary, is shown on the following page.

The Compact should be re-visited annually with the school's parent organization(s), and signed by the principal and parent representative. The compact should be posted at the school's website, and/or incorporated into the school's Handbook.

## EXAMPLE OF PARENT COMPACT

### Whittier International Elementary School Parent Compact

This compact has been jointly developed and agreed upon by school and parents of students served in the school pursuant to Title I.

Responsibilities of the school:

Whittier International Elementary will:

- Provide a high quality curriculum and instruction and a supportive and effective learning environment enabling students to meet the state academic standards.
- Involve parents in an organized ongoing and timely way in the planning, review and improvement of Title 1 programs, plans and policies.

Responsibilities of the administration and staff:

The staff will:

- Assist administration in facilitating and implementing the Title 1 parent involvement policy and parent involvement activities.
- Advise parents of their students' progress on a regular basis.
- Be readily accessible to parents and provide opportunities for parents to meet with them on a regular basis to discuss their students' progress and to participate as appropriate in the decisions relating to their students' education.
- Provide opportunities for parents to volunteer and participate in their students' class and observe classroom activities.
- Communicate teacher and parent responsibilities contained in the student ILP.

The administration will:

- Hire and retain highly qualified staff.
- Support communication to families
- Serve as a liaison between district Title 1 and Whittier International.
- Provide opportunities for staff to engage in professional development to support Title 1 students.

Responsibilities of parents:

Parents will:

- Support their students' learning at home by:
  1. Monitoring attendance.
  2. Monitoring completion of homework.
  3. Encouraging positive use of extra curricular time.
- Volunteer time at Whittier International.
- Participate, as appropriate, in decisions related to their students' education.
- Attend and participate in two parent conferences per year.
- Actively communicate with the school staff regarding their students' needs and circumstances.
- Be aware of the parental responsibilities contained in the ILP.

This policy and compact has been jointly developed and agreed upon by the Whittier International Elementary School and parents of students served in the school pursuant to Title 1.

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School Principal Name	Date	Signature
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Parent Representative Name	Date	Signature
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## 19. School-wide and Targeted Assistance Programs; Title I Plans

A **Title I school-wide (SW) program** is typically offered in a high poverty school in order to carry out comprehensive, coordinated school improvement strategies that are supplemental to the basic educational program. Any child in the school may be served, although services must still be prioritized to the children at greater risk, or in greatest need. Individual students are not identified or monitored for participation. CDE offers more extensive information about school-wide programs here: [http://www.cde.state.co.us/fedprograms/ti/a\\_sw](http://www.cde.state.co.us/fedprograms/ti/a_sw).

In practice, CDE is now discouraging schools from adopted a school-wide program, because research has shown that targeted assistance has more distinct impacts on students. (see research study here: [http://www.cde.state.co.us/sites/default/files/documents/fedprograms/dl/dper\\_evalrpts\\_dissemrpt.pdf](http://www.cde.state.co.us/sites/default/files/documents/fedprograms/dl/dper_evalrpts_dissemrpt.pdf))

A **Title I targeted assistance program** can be offered in any Title I school. With Targeted Assistance, Title I funds are used to provide specific, supplemental supports, such as expanded learning time and interventions. Students are individually identified for Title I services based upon their academic status (failing to meet grade level standards); however, homeless, migrant, foster-care, and Headstart children are considered de-facto eligible due to risk; in Colorado, ELLs are also considered at-risk and may be served. A student does not have to be low-income to be served (in fact, this must **not** be considered when determining which students will receive services.) A targeted assistance (TA) school is required to monitor the students served, the services provided, the teacher/service provider, and the days/hours of service throughout the school year. You can read CDE's 'long form' version regarding TA requirements here: [http://www.cde.state.co.us/fedprograms/ti/a\\_ta](http://www.cde.state.co.us/fedprograms/ti/a_ta)

**How do you know if your school is SW or TA?** Columbine, Emerald, Pioneer, Sanchez and University Hill are Schoolwide. Arapahoe Ridge and Justice High are Targeted Assistance.

Title I schools are required to have **either a School-wide Plan or Targeted Assistance Plan.**

Required elements in a SW or TA plan include:

- Needs assessment (review and analysis of student and teacher data)
- General strategies to improve student outcomes
- Activities to ensure mastery of knowledge and skills
- Coordination and integration of funds

In Colorado, the annual Unified Improvement Plan is used as a School-wide or Targeted Assistance plan.

✳ **Schools should be able to show how their Title I spending supports their UIP/SW/TA Plan.**

## **20. Special Data Requirements for Targeted Assistance Schools**

All school districts with TA schools must submit data to CDE with information about the students who are being served. CDE in turn sends this to a US Department of Education database. Therefore, Targeted Assistance schools must submit data twice a year regarding the students they are serving. This is accomplished via a Google Sheet that the BVSD enrollment office prepares. Schools receive an email notifying them when this is required, and a deadline to submit their data. The Google Sheet for each school lists all of the students that are enrolled, with their student identifying number. Someone at the school who is knowledgeable (the principal or a Title I teacher) completes the form, indicating which students are being served, and the services they are receiving. There is a long list of ‘possible’ services – there is no problem if a student is receiving support only in, say, math. No awards are given for checking all the boxes.

If the enrollment office has any questions about the data in the form, they will contact the principal or other responsible party. The BVSD enrollment office submits all of the district’s TA student data together, via CDE’s data pipeline. CDE seldom has questions, so once you have completed the form, you are done.

## **21. District Annual Application to CDE – The Consolidated Grant**

**Timeline:** BVSD now begins work on the Consolidated Application in early spring, synchronously with development of district and school budgets for the next fiscal year. Title I principals will receive an email from the Director of Federal Programs when it is time to start work. The preparatory period allows time for meetings, emails and phone calls to be exchanged. Schools are typically asked to submit their Title I plan and budget by May 30<sup>th</sup>. The actual timeline for the year is published at the outset as part of the district’s communication with schools.

**Process:** CDE’s Consolidated Grant application is submitted via an online platform, which often becomes available only in late spring. To avoid confusion, over-writing, and incorrect entries, only a limited number of district personnel have access to CDE’s application.

To allow more time for prep work, BVSD develops its application in Google docs and sheets, and then transfers the information to CDE’s online system. Our Google sheets are set up to retain information about what has originally been proposed, and what changes over the course of the year. Yes -- changes are allowed, once CDE has reviewed the initial application and approved it.

CDE’s application requires legal assurances, data, narrative and budget sections. Title I schools do not have to supply assurances, data or narrative – only create a budget in a Google sheet.

The Consolidated Grant also includes BVSD’s application for Title II, III and IV, as well as Title I.

**Who’s Involved:** The Director of Federal Programs has ultimate responsibility for the application (and also does a lot of the work on it). Budget entries are the responsibility of the Financial Analyst and Senior Grants Accountant. To develop the application, we work with the Assistant Superintendents for Elementary and Secondary School Leadership, and Instructional Services and Equity, the Directors of Professional Learning, Mathematics, Literacy, English Language Development, Instructional Technology, Student Services, Health Services, etc. And of course we work with the principals of the seven Title I schools.

## 20. School Sub-Applications For Title I

Each Title I school has a Google Sheet, which we call a “**sub-application,**” that has been prepared by BVSD Federal Programs staff, to develop their plan and budget for the next year. The Google Sheet for each school contains:

Instructions

- A Timeline, including the deadline
- A Sample sub-application (simplified, showing how to fill out the Sub-Application)
- A blank School Template for the upcoming year
- Template(s) to receive revisions to the upcoming year’s application (blank, to be used later)
- The school’s Title I budget for the prior year (for reference)
- A page with a list of allowable expenses (also for easy reference)

The blank School Template shows the school’s allocation, and parent engagement allocation. It says “**USE THIS PAGE FOR INPUT**” in red, up at the top. **Areas to be completed or selected are highlighted in blue.** The template looks like this:

**FY18-19 Uni Hill SubApp**  
 File Edit View Insert Format Data Tools Add-ons Help Last edit was made on November 20 by Christine Kennedy

	A	B	C	D	E	F	G	H
1	<b>University Hill Elementary</b>		School-Wide	<b>Use this page for input</b>			3285	
2	Principal:	Ina Rodriguez-Myer					715,473	
3	Principal Assistant:	Veronica Ramirez					4000,473	
4	Allocation Amount:	\$233,002						
5	Parent Engagement Allocation:	\$3,661	Running Balance	Total Allocated	Allocation Check			
6	Total School Budget (Allocation + Parent Engagement):	\$236,663		\$0	\$236,663	\$0		
7	Deadline Date:	Monday, June 4th, 2018						
9	<b>(A) Overview of Your Unified Improvement Plan:</b>							
10	A. List Your School's Priority Performance Challenges from 2017-18 UIP:							
11	B. List Your School's Top Strategies from 2017-18 UIP: Provide individualized math and literacy support both during school and afterschool for children not meeting grade level expectations.							
12	<b>(B) Overview of Your Title I Program:</b>							
13	1. List content areas and academic needs addressed: Math, Literacy, Social Emotional Learning							
14	2. List behavioral challenges addressed:							
15	3. List teacher professional development needs addressed: New staff needs training in the strategies that have been implemented the last few years; All staff needs support with the implementation of the new literacy curriculum.							
16	4. Student groups targeted for supplemental supports: Students not meeting grade level expectations, Emerging Bilingual Students; Students identified in TAG (low growth).							
17	5. Interventions supported in your Title I program: Literacy and Math							
18	6. Does your Title I Program provide (check all that apply): Increased intensity of Instruction X Extended time for instruction X Different methods of instruction X Other (describe)							
19	7. Provide any other additional description that would be helpful to others in understanding how you use Title I at your school: At University Hill, we are providing support during Universal instruction for all students - especially those not meeting grade level expectations. In addition, tutors, teachers, and Para personnel are used to support with this instruction.							
20	<b>(C) After You Develop Your Budget, Please Reflect and Check:</b>							
21	Do your Title I expenses (below) generally address your Priority Performance Challenges and your Top Strategies? X Yes ___ No							
22	Do your Title I expenses generally align with the description of your Title I Program, above (C)? X Yes ___ No							
23	IF NOT, please explain briefly:							
26	<b>Instructional Expenses</b>	<b>Category</b>	<b>Strategy</b>	<b>Principal's Common-Sense Description</b>	<b>CDE Description (Bee will supply)</b>	<b>Amount</b>	<b>FTE</b>	<b>Teacher Name (If applicable)</b>
27		Salary	1 ACADEMIC ASSISTANCE TO AT-RISK STUDENTS	Provide timely and accelerated assistance to students who are most at-risk of not meeting state academic requirements, with consideration for differentiated needs that may arise by inclusion in a historically underserved disaggregated subgroup (IEP,EL,FRM,MIN) or other identification criteria (HM* as, determined by the comprehensive needs analysis.	Provide an 0.3 FTE interventionist to deliver literacy interventions students in Grades K-5. This enables supplemental and intensified instruction during the regular school day/year, offered either individually or in small groups, as part of a classroom's literacy block. The school uses Reading Recovery and Leveled Literacy Intervention. The highest needs students are selected by teachers for these services based upon a body of evidence, including ACCESS and CMAS scores, IREADY diagnostics, grades, and attendance, as well as parent recommendations. Literacy interventions are in addition to those prescribed by the Colorado Read Act.	\$21,584	0.37	Miguel Sanchez
28		Benefits	1 ACADEMIC ASSISTANCE TO AT-RISK STUDENTS		Pro rata full benefits for interventionist: 0.37 x (\$7,514 medical/dental/life/flex and 21.78% PERA/Medicare/LTD)	\$10,243		Miguel Sanchez
		Salary	1 ACADEMIC ASSISTANCE TO AT-RISK STUDENTS	Provide a math specialist in order to enable small-group math instruction and interventional methods during the regular school year/day, in Grades 2-5.	Provide a 0.43 FTE instructional paraeducator to support small-group math instruction for Tier 1 students in grade 2-5 classrooms during literacy blocks, using the Math Expressions	\$14,100	0.48	Celeste Landry - Academic Tutor

Editing rights to the Sub-application are given to principal; district staff can also make changes. Principal may give access to additional staff at their school (an administrative assistant, Treasurer, or lead teacher) but should limit editing to a small number of trained staff to avoid confusion.

When constructing a school Title I budget:

- Contact Thalia Mack at [thalia.mack@bvsd.org](mailto:thalia.mack@bvsd.org) or extension 6265 to get correct 'next year' salaries and benefits for a staff person.
- Use district standard rates for substitutes and extra-duty pay, and include benefits for these line items.
  - Extra-duty pay is currently \$33.31/hr salary and 21.78% benefits
  - Subs are still at \$100/day or \$55/half day, unless working both Mon and Fri of a given week, in which case the daily rate is \$140. Substitute benefits are 21.6% of salary. Be careful about budgeting 'whole school' events that require many subs on the same day – it can be difficult to impossible to fill the requirement.
- Use whole dollars only – no decimals. Round up to the nearest dollar.
- Try to use your entire allocation. If, however, you get down to the last dollars and cannot spend it all or cannot get the budget to balance, go ahead and submit your sub-application with a request that BVSD staff provide a 'fix'. We are happy to do this, do it often, and in the end, it all comes out in the wash. We will provide notes on the budget that explain the changes we have made.
- When in doubt, feel free to call Federal Programs staff to talk through a question, knotty problem, or concern.

### **23. Revisions to Title I During the School Year**

School districts and schools are allowed to revise their Consolidated grant once they have received approval on the initial application from CDE. BVSD does this in **two ‘windows’ – October-November and February-March**. Principals will receive an email from the Director of Federal Programs telling them when the window is open.

Principals are welcome to use any means that is comfortable to convey their changes: use one of the Revisions templates; send an email summarizing changes; set up a meeting; or just call to start the process. BVSD staff will work with you to get your budget revised and re-balanced; we take care of submitting revisions to CDE. CDE usually approves changes quickly.

**URGENT CHANGES:** If a change is urgently needed before one of the windows opens, a principal should contact the Federal Programs Director. “Urgent” changes would be major – eliminating an entire program and substituting another; removing staff positions and substituting a contract provider; exchanging major instructional expenses for professional development. Provided the change is an approvable expense, we can obtain a go-ahead from CDE via email, allowing the school to proceed with these urgent changes without waiting.

**Ordinary changes** – increasing/decreasing a line item; changing the teacher assigned to the grant; subbing one parent event for another – are not considered urgent. With notification to and approval from BVSD Federal Programs Director, a school may receive permission go ahead and implement these -- we will just submit the changes with all others during our revision windows.

## **24. Unspent Funds and Carryover**

If a district does not spend all of its Title I funds during the budgeted year, it is allowed to carry over these funds to the next year, adding them to the new allocation. There is a limit on this (15%) without a waiver from CDE, and per ESSA law, waivers can be given only once every three years. *Some* carry over is helpful and good – providing a cushion for reductions in the grant, or unanticipated needs. A *large* amount of carry over shows that we are not able to execute our plans and that children are not getting services that might help them.

Title I schools receive a monthly statement from the Finance and Accounting Office showing how much of their Title I funds they have spent, and the balance. Please contact Thalia Mack if you have any difficulty interpreting this report, or if you find that the report does not correspond to what you know about your spending.

BVSD encourages schools to use all of the funds they are allocated. If a school does not spend all of its money, the excess goes back into the general Title I pot, to be shared by all schools and programs, and it is not retained exclusively by the school.

If there is carry-over, BVSD will try to get it re-allocated proportionally to Title I schools for the next year with the original sub-application. By 'proportionally' we mean using the same rank order and FRL data used for the new allocation. If this is not possible, carryover will be distributed to the schools in time for the first revision window. Schools can help us get the carry-over calculated and distributed with the original sub-application by submitting Title I expenses in a timely fashion – do not hold onto PS-12's, Requests for Payment, etc. until after the end of the fiscal year. Turn them in as soon as an event/purchase has occurred, preferably before May 15<sup>th</sup>.

25. Summary of BVSD’s 2018-19 Title I Budget

Here is a summary of spending in the 2018-19 Consolidated Grant, per the original application:

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**OVERVIEW: Income**

**Title I-A**

Allocation	\$1,923,882
Carryover	<u>\$ 3,128*</u>
<b>Total</b>	<b>\$1,927,010</b>

**Title II-A**

Allocation	\$ 433,535
Carryover	-
Transfer from Title IV	<u>\$ 86,389</u>
<b>Total</b>	<b>\$ 519,924</b>

**Title III-A**

Allocation	\$ 207,553
Carryover	<u>-*</u>
<b>Total</b>	<b>\$ 207,553</b>

**Title IV**

Allocation	\$ 150,074
Carryover	\$ 28,000*
Transfer to Title II	<u>\$ (86,389)</u>
<b>Total</b>	<b>\$ 91,685</b>

**TOTAL CONSOLIDATED FEDERAL PROGRAM INCOME FY 19: \$2,746,172**

\* These amounts later increased, after Finance and Accounting was able to calculate carry-over.

**OVERVIEW: Expenses**

Instructional	\$1,527,881	(56%)
Improvement of Instruction (PD)	\$ 854,791	(31%)
Support	\$ 221,882	( 8%)
Administration	\$ 37,565	( 1%)
Indirect Costs	\$ 104,053	( 4%)

Salaries & Benefits	\$ 2,470,935	(90%)
All Other	\$ 275,237	(10%)

## Total Title I Spending Summary

<b>Allocations to schools:</b>	<b>\$1,377,220 (71%)</b>
<b>District Managed Funds:</b>	
Family Literacy	\$ 144,932
McKinney-Vento (Homeless)	\$ 86,404
Math Coach Title I schools 0.8 FTE	\$ 99,602
Non-Public Schools	\$ 13,528
Parent Activities	\$ 1,065
Summer School	\$ 101,496
<u>District Administration</u>	<u>\$ 26,868</u>
<b>Subtotal District Managed</b>	<b>\$ 473,895 (25%)</b>
<b>Indirect costs (4.1%)</b>	<b>\$ 75,895 (4%)</b>

## Detail: Title I School Allocations and Spending

*Per pupil amount: \$979 (all schools).*

*Criteria for serving schools:* grade-span grouping (elementary) with the same poverty percentage applied district-wide (40%), 50% FRL threshold for high schools. Schools to be served are (in statutory rank order):

<p><b>1. Justice Middle &amp; High School*</b>      <b>Allocation: \$ 72,592</b></p> <ul style="list-style-type: none"> <li>• Title I Teacher (1.0) for small group literacy and math instruction</li> <li>• Reading Specialists (0.45) for small group literacy intervention</li> <li>• Monthly parent engagement programs</li> </ul> <p>Total Enrollment: 79    Poverty: 100% mid - 92.11% high    Accountability Status: AEC Improvement/ESSA Comprehensive Improvement<sup>#</sup>    Type of Program: TA</p>
<p><b>2. Sanchez Elementary</b>      <b>Allocation: \$250,584</b></p> <ul style="list-style-type: none"> <li>• Additional 2<sup>nd</sup>, 4<sup>th</sup> and 5<sup>th</sup> Grade Teachers (3.0)</li> <li>• Paraprofessional to support PBIS behavioral interventions (0.813)</li> <li>• Extra-duty pay for counselor to make home visits (0.11)</li> <li>• Childcare, supplies, translation and consumables for parent engagement activities.</li> </ul> <p>Total Enrollment: 401    Poverty: 70.99%    Accountability Status: ESSA Improvement<sup>#</sup>    Type of Program: SW</p>
<p><b>3. University Hill Elementary</b>      <b>Allocation: \$236,663</b></p> <ul style="list-style-type: none"> <li>• Reading Interventionist (0.37 ) for Reading Recovery and LLI</li> <li>• Paraprofessional (0.48) to support small-group math instruction</li> <li>• Native Language Tutors (1.31) to support literacy flooding and access to content</li> <li>• Paraprofessionals (1.51) to support reading and math in Spanish</li> <li>• TAG Tutor (0.21) to support bilingual students in TAG projects</li> <li>• Substitutes and extra time for teachers for collaborative meetings, literacy PD, Kagan training, UIP development, new teachers in Well-Managed Schools, and data summits.</li> <li>• Supplemental instructional materials</li> <li>• Literacy and Math nights for parents, and a 1-day Leadership Academy for parents</li> </ul> <p>Total Enrollment: 443    Poverty: 56.26%    Accountability Status: ESSA Meets    Type of Program: SW</p>

<p><b>4. Columbine Elementary</b> <span style="float: right;"><b>Allocation: \$264,505</b></span></p> <ul style="list-style-type: none"> <li>• Additional 1<sup>st</sup> and 4<sup>th</sup> Grade Teachers (2.0)</li> <li>• Paraprofessionals to support kindergarten classrooms (1.62)</li> <li>• Supplemental reading books in Spanish and English</li> <li>• Childcare and supplies for parent engagement activities</li> <li>• Community liaison to coordinate parent engagement (0.5 FTE)</li> <li>• Teacher PD at CABE and La Cosecha conferences</li> </ul> <p>Total Enrollment: 531   Poverty: 55.07%   Accountability Status: ESSA Priority Improvement<sup>#</sup>; Targeted Support   Type of Program: SW</p>
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<p><b>5. Emerald Elementary</b> <span style="float: right;"><b>Allocation: \$189,927</b></span></p> <ul style="list-style-type: none"> <li>• Additional 1st Grade Teacher (1.0)</li> <li>• Literacy interventionist for Reading Recovery and LLI (0.3)</li> <li>• Paraprofessional to support reading in Grades 3-5</li> <li>• Program coordinator and para for after-school program (0.73)</li> <li>• Substitutes for data summits and Kagan training</li> <li>• Parent/community learning event and summer take-home books</li> </ul> <p>Total Enrollment: 402   Poverty: 53.06%   Accountability Status: ESSA Meets   Type of Program: SW</p>
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<p><b>6. Pioneer Elementary</b> <span style="float: right;"><b>Allocation: \$186,944</b></span></p> <ul style="list-style-type: none"> <li>• Additional Kindergarten Teacher (1.0)</li> <li>• Paraprofessional to support tiered behavioral program (0.5)</li> <li>• Paraprofessionals to provide support for instruction and socio-emotional learning (1.76)</li> <li>• Substitutes for teacher data summits</li> <li>• Supplies, translation and child care for parent engagement activities</li> </ul> <p>Total Enrollment: 477   Poverty: 42.34%   Accountability Status: ESSA Improvement<sup>#</sup>   Type of Program: SW</p>
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<p><b>7. Whittier Elementary**</b> <span style="float: right;"><b>Allocation: \$115,348</b></span></p> <ul style="list-style-type: none"> <li>• ELD Interventionist to support emerging bilingual students (0.3)</li> <li>• Literacy Interventionist to support kindergarten (0.25)</li> <li>• Literacy and Math Interventionist to support students in Grades 3-5 (0.6)</li> <li>• Childcare and translation for parent engagement activities</li> </ul> <p>Total Enrollment: 381   Poverty: 30.45%   Accountability Status: ESSA Meets   Type of Program: TA</p>
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<p><b>8. Arapahoe Ridge High School***</b> <span style="float: right;"><b>Allocation: \$ 60,657</b></span></p> <ul style="list-style-type: none"> <li>• Academic tutor to support students during LA and Math classes (1.0)</li> <li>• Student and parent events providing education on opioid abuse</li> <li>• Teacher to provide after-school tutoring (132 hrs or .08 FTE)</li> <li>• Snacks and bus passes for students staying after school for tutoring</li> <li>• PBIS supplies; supplies and transportation for students and parents on Conference nights</li> <li>• Professional development for teachers on Trauma-Informed Schools</li> </ul> <p>Total Enrollment: 381   Poverty: 61.00%   Accountability Status: AEC Meets   Type of Program: TA</p>
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\* Mandatory service, poverty >75%  
 \*\* Poverty below 40% for +2 years; this will be Whittier's last year in Title I  
 \*\*\* Poverty has dropped below mandatory service level; served this year under optional 50% rule for high schools.  
 # Schools designated for ESSA Improvement, Priority Improvement or Comprehensive may be eligible for supplemental support, including grants, from CDE

**Detail: Title II-A Spending**

1.66 FTE Math Instructional Coaches	\$191,889
2.31 Induction Mentors	\$282,630
.09 FTE Administrative staff	\$ 13,692
National Board Certification Instructor	\$ 1,531
Private Schools*	\$ 9,705
<u>Indirect Costs</u>	<u>\$ 20,477</u>
<b>Total Expenses</b>	<b>\$519,924</b>

\* Sacred Heart of Jesus, St. Louis School, Nativity of Our Lord

**Detail: Title III Spending**

1.50 FTE ELD Instructional Coaches	\$171,442
Curriculum Development – bilingual pathways	\$ 1,178
Dual Language Consultant	\$ 10,200
Teacher/administrator Conferences	\$ 8,875
ELD Teacher Summits & PD (substitutes)	\$ 6,688
Supplies for PD	\$ 5,100
<u>Indirect costs</u>	<u>\$ 4,070*</u>
<b>Total</b>	<b>\$207,553</b>

\* Indirect costs for Title III statutorily constrained to ≤3%

**Detail: Title IV Spending**

Mobile Maker kits and teacher training	\$ 18,864
World Language programs – elementary	\$ 17,977
Health Services -- chronic absenteeism	\$ 4,756
Middle Level CLASS teacher training	\$ 37,077
AP Test Fees for Low-Income Students	\$ 9,400
<u>Indirect costs</u>	<u>\$ 3,611</u>
<b>Total</b>	<b>\$ 91,685</b>