



Title I, Part A Guide

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Introduction

This guide is designed to help Title I, Part A directors and LEA employees develop and maintain successful Title I, Part A programs. It offers guidance on basic program requirements, administration, fiscal procedures, accountability, and other pertinent information required to implement the various Federal program components found in the reauthorization of Title I, Part A of the Elementary and Secondary Education Act as reauthorized as the Every Student Succeeds Act (ESSA) of 2015, but it is not intended to replace Federal law.

This guide is based on the interpretation of ESSA and the rules and guidelines published by the U.S. Department of Education (ED). It includes several samples, which are not intended to apply to every situation. The samples are not official templates and should be adapted to specific LEA requirements if used. If there is any doubt as to the applicability of the samples, the Office of Federal and State Accountability (OFSA) at the South Carolina Department of Education (SCDE) advises each LEA to consult with our office.

This Title I, Part A Guide will answer many questions; however, OFSA staff can provide individualized technical assistance. LEAs are invited to contact OFSA's staff for personalized assistance, as necessary.

The Purpose of Title I, Part A Program

The Title I, Part A program is designed to provide additional learning support to low-achieving students.

Title I, Part A is a Federal program designed to “provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.” Title I, Part A can support early learning and K–12 education. Title I, Part A programs and services offer tailored instruction and curricula to help students meet state academic standards and actively engage in learning. As the oldest and largest Federal education program, Title I, Part A programs build equity of opportunity for children whose struggles often keep them on the academic sidelines. Nearly 40% of the public schools in South Carolina operate Title I, Part A programs, providing academic services to over 300,000 students annually.

Title I, Part A requirements are established by Federal law and regulations, further augmented by State rules. LEAs should also consider non-binding Federal and State guidance. Title I, Part A has Federal compliance, audit, and data reporting requirements.

Tips for New Title I, Part A Directors

1. **Familiarize** yourself with the Title I, Part A Guide.
2. **Visit** the [Title I, Part A](#) website and read the Title I, Part A Non-Regulatory Guidance.
3. **Review** information in your LEA's Targeted Assistance (TAS) protocols or Schoolwide (SWP) plans. Read your LEA's most recent Title I, Part A Education Grant.
4. **Read the LEA's application in the Grants Electronic Management System (GEMS).**
5. **Read the accountability reports.** Visit the [SCDE website](#) to view school and district report cards.
6. **Visit your Title I, Part A schools often.** Familiarize yourself with their TAS protocols or SWP plans (if applicable) and procedures for student selection into the program, service delivery models, and Parent and Family Engagement (PFE) policies.
7. **Visit private schools participating in the Title I, Part A program** and any local institutions or homes receiving Title I, Part A funds for neglected or delinquent youth. Familiarize yourself with the services provided by the LEA for those students.
8. **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 (e.g., LEA PFE Policy, Parent Compacts, LEA/School Report Cards, Parents' Right-to-Know, etc.).
9. **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.
10. **Set up your files using the Title I, Part A Federal Program Review and Support Checklist Monitoring Tool** as an organizational framework. Keep current documents that will serve as evidence for each area.
11. **Maintain SWP plans and TAS protocols** 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 the program, date of exit, and reason for exit (e.g., academic exit, moved, dropped by parent request, etc.).**
12. **Follow records retention requirements for Federal programs.** All Federal and State program records, supporting documents, statistical records, and other records pertinent to program regulations on the grant award must be retained for six years. If there is a pending audit, all related documents must be maintained until the audit is settled.

Title I Program Models

Title I, Part A provides for two program models: (1) a targeted assistance program or (2) a schoolwide program. A summary of the models is listed below.

Targeted Assistance Programs

A Targeted Assistance School (TAS) receives Title I funding under the Elementary and Secondary Education Act (ESEA) to support educationally disadvantaged students. Still, unlike a Schoolwide Program, the assistance is targeted only at specific students identified as most at risk of failing.

Key Features of a Targeted Assistance School:

- **Selective Services:** Only identified students (not the entire student body) receive additional academic help.
- **Eligibility Criteria:** Students are selected based on multiple educational criteria, not income alone (e.g., academic performance, teacher recommendations, assessments).
- **Supplemental Support:** Services provided must supplement, not replace, the regular education program.
- **Use of Title I Funds:** Funds support eligible students through tutoring, extra instruction, summer programs, etc.

Schoolwide Programs

A Title I Schoolwide Program is a federally funded educational program that allows a school to use Title I funds to improve the entire academic program of the school, not just services for selected students. It is designed to help all students, especially those at risk of academic failure.

Key Features of a Title I Schoolwide Program:

- **Services:** All students can benefit, regardless of academic or income status.
- **Eligibility Criteria:** The school must have at least 40% of its students from low-income families (or receive a waiver from the state).

- **Whole-School Improvement:** Funds can be used to enhance instruction, provide professional development, upgrade curriculum, support family engagement, and more, for all students and staff.
- **Focus Areas:** Often include reading and math interventions, extended learning time, school climate initiatives, and strategies to address achievement gaps.
- **Use of Funds:** Schools can blend Title I funds with other federal, state, and local funds to implement comprehensive reforms.

Title I, Part A Programmatic Requirements

Title I, Part A is a state-administered program. The U.S. Department of Education (ED) grants funds to the South Carolina Department of Education (SCDE) based on statutory formulas. SCDE allocates these funds to LEAs using a statutory formula. LEAs then allocate funds to schools based on “ranking and serving,” a process outlined in the “Eligible School Attendance Areas” section below. While allocations are based on poverty levels, the services to students are based on academic need. Title I students are those who have been identified as failing or most at risk of failing challenging State academic standards.

Funds: Eligible Attendance Areas

Each Title I, Part A project submitted to SCDE must annually identify the schools or school attendance areas selected for inclusion in the project using appropriate low-income measures, which have been consistently applied throughout the LEA.

- An LEA must use the same measure of poverty to:
 - Identifying eligible school attendance areas.
 - Rank schools by poverty level; and
 - Determine the per-pupil allocation for each area. ESEA Sec. 1113(a)(5)(A).
- According to Sec. 1113(a)(5) of the ESEA, LEAs must select one of the poverty measures to determine relative percentages of children from low-income families residing in their attendance areas. Those five measures are:
 - Children ages 5-17 in poverty, as counted in the most recent census data approved by the Secretary.
 - Counts of children eligible for free and reduced-price school meals.

- Counts of children whose families receive assistance under the Federal welfare program, Temporary Assistance for Needy Families, and Counts of children eligible to receive medical assistance under the Medicaid program.
- A combination of two or more of these data sources.

A district must rank school attendance areas based on the percentage (not the number) of low-income children counted.

Title I, Part A eligible schools/school attendance areas are determined using one of two methods:

- 1) if the percentage of children from low-income families equals or exceeds the district's percentage of children from low-income families (known as the District Average); or
- 2) if the percentage of children from low-income families equals or exceeds 35 percent (known as the 35 Percent Rule). ESEA Sec. 1113(b).

The LEA must serve all schools above 75 percent poverty, regardless of grade span, before serving any school below 75 percent (see Special Ranking Rules section below for one exception to this rule). If funds remain, the LEA may rank the remaining eligible schools below 75 percent either district-wide or by grade span. Using the same district-wide average, or 35% rule, these schools should be served in rank order, from high to low. If an LEA has no schools/school attendance areas above 75 percent poverty, the LEA may rank district-wide or by grade span grouping.

A district's organization of its schools defines its grade span groupings. For example, if a district has elementary schools serving all elementary, middle, and high schools, the grade span groupings would be K-5, 6-8, and 9-12. To the extent a district has schools that overlap grade spans (e.g., K-5, K-8, 6-8), the district should include a school in the grade span in which it is most appropriate.

Allocating Title I Funds to Participating Schools

LEAs must allocate Title I funds to participating schools or school attendance areas in rank order based on the percentage of poverty, from highest to lowest. The LEA must allocate a higher per-pupil amount to areas/schools with higher poverty rates than to areas/schools with lower poverty rates. ESEA Sec. 1113(a)(3).

Rank and Serve

In choosing how to distribute funds, LEAs are required to adhere to a few rules:

- **75 percent rule:** Every school within a 75% or higher poverty rate must be served by the Title 1 program, regardless of the school's grade span. This provision ensures that LEAs that tend to favor elementary schools serve higher-poverty secondary schools.
- **125 percent rule:** If a district chooses to serve any schools within a poverty rate below the 35% threshold, all served schools must receive an amount per low-income pupil equal to at least 125% of the per-child allocation for the district as a whole. This 125% calculation must be conducted before the LEA takes any "off the top" reservations. For example, if a district has 1000 low-income students and receives \$100,000 from Title I, Part A, the allocation is \$100 per pupil. If the district serves any schools below 35% poverty, the amount per pupil allocation for all schools is \$125 per pupil. ESEA Sec. 1113 (c)(2).
- **Grade Span:** Once all schools above the 75% threshold are served, an LEA may rank schools within grade spans rather than all schools together. This means an LEA could rank elementary schools separately from middle and high schools and choose to serve some grade spans and not others. Within a grade span, higher poverty schools still must be served first and receive more money per low-income pupil. If an LEA's schools have irregular grade spans, a school should be included in the grade span deemed most appropriate by the LEA according to ED's guidance.
- **Small District Exemption:** Districts with fewer than 1000 students enrolled or with only one school in each grade span do not have to rank eligible schools in poverty order. However, they still must serve only schools that meet the eligibility requirements.
- **High Schools:** A district may prioritize its high schools with a poverty rate of at least 50%, essentially treating them as though they have a 75% rate; a high school with 50% poverty may be served before an elementary school with a higher poverty rate.

Special Ranking Rules

Skipping a School

An LEA may skip and not serve a school in order of rank, provided the school meets:

- A provision of the law does allow an LEA to skip and not serve a school, provided the school meets:
- The comparability requirements of Section 1113(b)(1)(D) of the law (skipped schools are to be treated as Title I schools in comparability comparison calculations).
- The school is receiving supplemental funds from other State or local sources that are spent for programs that meet the requirements of schoolwide or targeted assistance programs (a skipped school must still complete and implement the components of a schoolwide or targeted assistance plan) and

- The funds expended from other sources equal or exceed the amount provided if the school were served by Title I (these “Title I replacement funds” must be in addition to the state and local resources the school would typically receive). Section 1113(b)(1)(D)(i) of ESEA.
- For more information on skipping schools and meeting the funding requirements, see B-4 in the [Title I Fiscal Issues Guidance](#).

Grandfather Clause

The grandfather clause allows an LEA to continue to serve a school for only one additional year if that school falls below the minimum eligibility threshold for Title I, Part A. ESEA Sec. 1113(b)(1)(C). The minimum eligibility threshold is 35 percent poverty or the district’s average poverty rate, whichever is lower. This provision helps LEAs run continuous programs in schools near the eligibility threshold. However, an LEA may not invoke the grandfather clause if, by serving the grandfathered school, the LEA would “skip” a higher-ranked eligible school without meeting the skipping eligibility noted above. This is only permitted when the grandfathered school is next in the ranking process and would otherwise be served if their poverty eligibility had not dropped below the eligible poverty threshold for that single year.

Targeting Eligible Attendance Areas

Enrollment may consist of the school’s 135-day Enrollment count and any private school count of students residing in the school’s attendance area (especially if the students at the private school are to be served).

The poverty percentage may consist of the March count of free and reduced lunch students and any private school student count for students residing in the school’s attendance area (especially if students at the private school are to be served).

Private school counts are important since dollars to private schools are based on poverty counts.

Title I, Part A Ranking and Allocating: Basis for Allocation

When allocating funds, Priority A schools must have an equal or higher per-pupil expenditure than Priority B schools.

Step	Priority	Basis for Allocation	Who May Be Served	Additional Conditions
1: LEAs with less than 1000 students may serve any school(s)	NA	Less Than 1000	Schools in an LEA with fewer than 1000 students.	The ranking and allocation rules do not apply to districts with fewer than 1000 students.
2: The LEA must first serve schools with over 75% poverty and may choose to serve high schools with at least 50% poverty.	A	75% Rule	Schools whose poverty rate is greater than 75%.	These schools must be served before any schools under 75% may be served.
	A	HS 50% or +	<i>Optional:</i> High schools with a poverty rate of 50% or greater are included in the priority A grouping.	If the district selects this option, all high schools with 50% or greater poverty must be treated equally. They must be served in rank order after those above 75%, but before those in priority group B.
3: The LEA may choose to serve the remaining schools via district average or grade span.	B	Dist. Avg.	Schools whose poverty rate is at least 35%.	Used for schools below 75% but at least 35%. Schools must be served in rank order, regardless of grade span. Do not use if using Grade-Span.
	B	Grade-Span	Schools whose poverty rate is at least 35%.	Used for schools below 75%, but at least 35%. Schools served based on grade span must be served in rank order within the grade span. Do not use if using District Average.
4: The LEA may choose to serve schools via these exemptions.	B	Less Than 35%	Schools whose poverty rate is at or greater than the district average, but less than 35%.	A minimum per-pupil allocation of 125% is required for <i>all</i> schools being served. This requirement is referred to as the 125% Rule.
	B	1-Year Extension	A school that was no longer eligible for Title I funds but was both eligible and served in the prior year.	This exemption allows a school to be eligible for one additional year. If a school under 35% is served, the 125% Rule applies.

*Adopted from the Washington State Department of Education

Establishing Bands of Poverty for School Allocations

	% of Poverty	Per Pupil Allocation
School A	100%	\$1,000
School C	98%	\$1,000
School J	95%	\$1,000
School B	91%	\$1,000
School E	80%	\$1,000
School K	75%	\$800
School M	60%	\$800
School D	51%	\$800

All schools are to be served using the 35 percent rule. The following bands have been applied:

- All schools from School A to School E, 100% to 80%, will receive \$1,000 per child.
- All schools from School K to School D, 75% to 51%, will receive \$800 per child.

The general funding concept applies here because the schools with the highest poverty receive the highest dollar amount per pupil.

Targeted Assistance Program

A Targeted Assistance Program provides supplemental services to identified children at risk of not meeting the challenging State academic standards.

Prerequisite for Eligibility: Title I, Part A provides formula grants to LEAs, which then allocate most of these funds to individual schools that are deemed eligible for Title I, Part A funds based on their poverty percentage. The eligible population for Title I, Part A includes (1) children not older than 21 who are entitled to free public education through grade 12 and (2) children who are not yet at the appropriate grade level for free public education. A targeted assistance program is the default program for a Title I school.

Eligibility: If a school is funded by Title I, Part A, then the school selects “eligible children” by identifying those who are “at risk or not meeting the State’s challenging student academic achievement standards.” 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 poverty.

Certain students may be identified as automatically eligible solely based on their status. Students who, in the preceding two years, participated in Head Start, Even Start, Early Reading First, or a Title I, Part C [Migrant Education program] are automatically eligible. Also, students who qualify under Title I, Part D (Neglected and Delinquent) and McKinney-Vento (Homeless) are automatically eligible.

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

1. Supplemental services to identified children
2. Based on a comprehensive needs assessment
3. Evidence-based practices (as defined below)
4. School and community engagement

Service Delivery Model: Supplemental assistance to core instruction for identified students:

1. In-class supplemental model (push-in)
2. Pull-out class model
3. Before school
4. Afterschool
5. Saturday school
6. Extended school year–summer school

Program Design: The TAS program must reflect the needs of the identified students. The program design must be based on a comprehensive needs assessment and include all six TAS program components listed below.

Responsibilities: The Title I, Part A administrator and teachers paid with Title I, Part A funds are responsible for meeting regulations.

Protocols in a TAS Program

Needs Assessment

A current rank-order list of identified students

Intervention Practices and Strategies

Coordination of resources with regular education and transition supports

Parent and Family Engagement

Professional Development Opportunities

Program Plan: A TAS plan must include:

- Students who will be served
- Required activities:
 - Help children meet challenging State academic standards, which may include programs, activities, and academic courses necessary to provide a well-rounded education.
 - Use strategies to strengthen academic programs through activities like expanded learning time, before/after school programs, summer programs, etc.
 - Coordinate with and support regular education programs (can include services to assist early childhood to elementary school transition)
 - Provide professional development
 - Implement strategies to increase parental involvement.
 - Coordinate/integrate Federal, State, and local services and programs (Head Start, other ESEA programs, nutrition programs, etc.)
- Required assurances by the school to LEA:
 - Help provide an accelerated, high-quality curriculum.
 - Minimize the removal of children from the regular classroom during regular school hours for instruction provided under Title I, Part A.

- Review the progress of eligible children on an ongoing basis and revise the TAS program to provide additional assistance to enable eligible children to meet challenging State academic standards.

NOTE: TAS programs may only serve identified students. Costs associated with the program include, but are not limited to, staff salaries, materials, and supplies. Title I, Part A Parent and Family Engagement (PFE) activities are designed for those students identified and provided with services through the TAS program.

Title I Schoolwide Programs

Schoolwide Programs allow a school to consolidate its Federal, State, and local programs (and sometimes funds) to upgrade the entire educational program and permit all students to be eligible as Title I students. Though the school is not required to identify certain children as eligible for services, the program must address the needs of students who do not meet the state academic achievement standards.

Eligibility of a School to Implement a Schoolwide Program

Title I, Part A provides formula grants to LEAs, which then allocate most of these funds to individual schools deemed eligible based on their poverty percentage. The eligible population for Title I, Part A includes: (a) children not older than 21 who are entitled to free public education through grade 12, and (b) children who are not yet at the appropriate grade level for free public education. In addition, to be a schoolwide school, the school must serve an eligible attendance area where 40% or more of the children are from low-income families. The SCDE may waive the 40% requirement, as deemed appropriate by the SCDE.

- In most South Carolina schools, this is defined as eligibility for free- or reduced-price lunch. ESEA Sec. 1114(a)(1)(B).

A school's Title I allocation must be large enough to provide a reasonable assurance that a school can operate a Title I Schoolwide program of sufficient quality, enabling the children most at risk of not meeting South Carolina's academic achievement standards to do so. ESEA Sec. 1114(a)(1)(A).

Once a Title I Schoolwide program has been approved, a school may continue to implement a Title I Schoolwide program even if the school's poverty percentage falls below 40 percent as long as the school remains eligible for Title I services. ESEA Sec. 1114(b)(3).

Identification of Students

A school implementing a schoolwide program is not required to identify particular children as eligible to participate or provide supplementary services to such children.

Components of a Schoolwide Program

Program Focus:

- 1) Supplemental services
- 2) Services based on a comprehensive needs assessment
- 3) Evidence-based practices
- 4) School and community engagement

Program Plan: An eligible school must first develop a comprehensive Title I, Part A Schoolwide Plan based on the comprehensive needs assessment of the entire school (considering the academic achievement of children in relation to the challenging State academic standards, particularly those failing or most at risk of failing). A planning year is suggested before becoming a SWP program, but that may be waived. The plan must be developed in consultation with the LEA and its school support team or other technical assistance provider. It must be developed with the involvement of parents and other members of the community to be served and individuals who will conduct such a plan, including teachers, principals, and administrators (including administrators of Federal programs).

Responsibilities: The entire staff supports the SWP plan. No one is labeled as the “Title I, Part A teacher.” The administrator and Title I, Part A staff are responsible for meeting regulations.

Service Delivery Model: Supplemental/additional assistance to core instruction for all students, particularly addressing the needs of those students at risk of not meeting the State’s academic achievement standards:

- In-class supplemental model (push-in)
- Pull-out class model
- Before school or after school
- Saturday school
- Extended school year–summer school

Three Components in a SWP

Comprehensive Needs Assessment

Comprehensive Schoolwide Plan

Annual Evaluation

Schools must take a full school year to plan for a schoolwide program unless it is determined unnecessary. ESEA Sec. 1114(b)(1).

Basic Planning Process for Title I Schoolwide Programs

1. Determine if the school is eligible to implement a Title I Schoolwide program. Then, a decision can be made in consultation with the LEA to plan and implement a Schoolwide program.
2. Conduct a comprehensive needs assessment planning of the entire school and identify needs based on data. Through the needs assessment, a school must consult with a broad range of stakeholders, including parents, school staff, and others in the community, and examine relevant academic achievement data to understand students' most pressing needs and their root causes. ESEA Sec. 1114(b)(2).
3. Review research on evidence-based strategies to prioritize identified needs and brainstorm areas to research.
4. Prepare a comprehensive schoolwide plan that describes how the school will improve academic achievement, particularly for the lowest-achieving students, by addressing the needs identified in the comprehensive needs assessment.

The plan must also contain descriptions of how the methods and instructional strategies that the school intends to use will strengthen the academic program in the school, increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum, including programs and activities necessary to provide a well-rounded education. ESEA Sec. 1114(b)(7)(A)(ii). The plan should include benchmarks for evaluating program results to ensure that the plan results in progress towards addressing the school's needs.

5. Submit the Schoolwide plan to the LEA.

6. Annually evaluate the schoolwide plan, using data from the State's assessments, other student performance data, and perception data to determine if the schoolwide program has been effective.

Comprehensive Needs Assessment

The comprehensive needs assessment ensures that a school's schoolwide plan best serves the needs of those children who are failing or are at risk of failing to meet the challenging State academic standards. A school must consult with a broad range of stakeholders, including parents, school staff, and others in the community, and examine relevant academic achievement data to understand students' most pressing needs and their root causes.

Therefore, according to Section 1114(b)(7) of the ESEA, a school operating a Schoolwide program must conduct a comprehensive needs assessment of the entire school that:

1. Is based on academic achievement information about all students in the school, including all sub-groups and migratory children, relative to the State's academic standards, to:
 - help the school understand the subjects and skills for which teaching and learning must be improved.
 - identify the specific academic needs of students and groups of students who are not yet achieving the State's academic standards; and
 - assess the needs of the school relative to each of the components of the Schoolwide program.
2. Is developed with the participation of individuals who will conduct the Schoolwide program plan.
3. Includes documentation on how the school conducted the needs assessment, the results it obtained, and the conclusions it draws from those results. ESEA Sec. 1114(b)(6).

The schoolwide plan describes how the school will improve academic achievement throughout the school, particularly for the lowest-achieving students, by addressing the needs identified in the comprehensive needs assessment. A schoolwide plan must describe how the strategies the school will implement will provide opportunities and address the learning needs of all students, particularly the lowest-achieving students.

Schoolwide Reform Strategies

Every schoolwide plan must contain certain components mandated by the statute, and each component must be described in the schoolwide plan. ESEA Sec. 1114(b)(7).

1. **Opportunities for all children.** The schoolwide plan must include a description of the strategies the school will implement to address school needs, including how such strategies will provide opportunities for all children to meet the challenging State academic standards. Focus should be given to the subgroups of students viewed for accountability purposes: economically disadvantaged, students from major racial and ethnic groups, children with disabilities, and ELs.
2. **Strong, well-rounded program.** The schoolwide plan must use methods and instructional strategies that strengthen the academic program in the school, increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum, which may include programs, activities, and courses necessary to provide a well-rounded education.
3. **Allowable Activities.** The schoolwide plan must address the needs of all children in the school, but particularly the needs of those at risk of not meeting the challenging State academic standards, through activities that may include:
 - Counseling, school-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students' skills outside the academic subject areas.
 - Preparation for and awareness of opportunities for postsecondary education and the workforce, which may include career and technical education programs and broadening secondary school students' access to coursework to earn postsecondary credit while still in high school (such as AP, IB, dual, or concurrent enrollment, or early college high schools).
 - Implement the schoolwide-tiered model to prevent and address behavior problems and early intervention **services**, coordinated with similar activities and services conducted under IDEA.
 - Providing **professional development** and other activities to teachers, paraprofessionals, and other school personnel to improve instruction and use of the data from academic assessments, and to recruit and retain effective teachers, particularly in high-need subjects; and strategies to assist preschool children in the transition from early childhood education programs.

Other Components to be Addressed in the Schoolwide Program Plan:

- Describe how the school will use resources under this part and from other sources to implement those components above.

- It includes a list of state, local, and federal programs under the section that will be consolidated in the schoolwide program.
- Describes how the school will provide individual student academic assessment results in a language that parents can understand, including an interpretation of those results, to the parents of a child who participated in the academic assessments required.

Maintaining Required Documentation of a Schoolwide Program

1. A school must retain documentation related to its three core components:
 - the comprehensive needs assessment,
 - the comprehensive Schoolwide plan, and
 - the evaluation.
2. Documentation relating to the needs assessment should include significant information about students' achievement and conditions in the school that directly affect their academic achievement.
3. Documentation relating to the comprehensive Schoolwide plan must contain specific information about how the program will implement the components, how resources will be used, the programs consolidated to support the Schoolwide program, and how student assessment results will be disseminated.
4. Documentation relating to the evaluation should include the method used and findings that describe the results achieved by the Schoolwide program and its implementation.

**Meeting the Requirements of the Title I Schoolwide Program Planning Team by
Considering School Improvement Council Members**

Title I Schoolwide Programs Title I Requirement Must Be Addressed	South Carolina School Improvement Councils State Requirement (http://sic-sc.gov/)	
Parents	Parents (elected)	
Teachers	Teachers (elected)	
Students in a secondary school	Students, grades 9–12 required (elected) Middle school students -optional	
Principal	Principal, Ex-Officio Member *	
Community Members	Representatives of business, civic, or service organizations (appointed by the principal) <i>and</i> The community category should also consider agencies representing medical, social service, law enforcement, and others.	
Local Agency Administrators (including other Federal Programs)	May be elected as part of the teacher category or, when appropriate, designated as ex officio	
Pupil Services Personnel – If appropriate (guidance counselor, social worker, etc.)	Maybe agencies such as medical, social service, or mental health <i>and</i> May be elected as part of the teacher category or, when appropriate, designated as ex officio	
Technical Assistance Provider(s) – (SSI Hub, Teacher Specialists, higher education- IHE, etc.)	May be elected as part of the teacher category or, when appropriate, designated as ex officio	
Other School Staff	* Ex-officio members may also include:	
	<ul style="list-style-type: none"> • PTA/PTO president • Volunteer coordinator • Title I parent advisory chair • Business partner 	<ul style="list-style-type: none"> • Booster Club president • Teacher of the Year • Last year's SIC Chair

NOTE: Concerning School Improvement Council:

Two-thirds of the members must be elected parents, students, and teachers. The principal appoints the remaining third of the council, carefully ensuring broad representation from the larger school community, including non-parent taxpayers with special expertise or perspective. There is no limit to the number of ex-officio members; they are expected to be named by position due to their contribution to implementing the five-year plan.

Schoolwide Plan Evaluation and Continuous Improvement

Schools must use the State's assessment data, other student performance data, and perception data to determine if a schoolwide program has effectively addressed the major problem areas.

- 1. Annually evaluate the implementation of the Schoolwide program and its results** using data from South Carolina's annual assessments and other indicators of academic achievement.
- 2.** Determine whether the Schoolwide program has effectively increased students' achievement in meeting South Carolina's academic standards, particularly for those who had been furthest from achieving the standards. **(Document the results of the evaluation in Schoolwide meeting notes.)**
- 3.** Update needs assessment data to see if the students' needs have changed.
- 4.** Revise the needs assessment summary.
- 5.** Make any needed modifications in the program based on the identified needs, annual evaluation, and evidence-based research.
- 6.** Revise the Title I Schoolwide program plan, as necessary, based on the evaluation results and updated needs assessment data to ensure continuous improvement of students in Schoolwide programs.
- 7.** Complete the Title I Schoolwide program plan for the school, including working with the Title I Coordinator on the budget for the plan, which ties to the identified needs and required strategies and supports the plan.
- 8.** Submit the Title I Schoolwide plan to the district for approval. The district will submit the Title I project, including the Schoolwide plan, to the State for approval.

Consolidating Funds in Schoolwide Programs

Consistent with Section 1114 of Title I, a school that consolidates and uses Schoolwide programs and funds from other Federal programs administered by the Secretary (except for Reading First) is not required to meet most statutory or regulatory requirements of the program applicable at the school level. However, the Schoolwide program must meet the intent and purposes of the programs that are consolidated to ensure that the needs of the intended beneficiaries are met. Such a school must demonstrate that its Schoolwide program contains sufficient resources and activities to reasonably address the intent and purpose of included programs, particularly concerning the lowest-performing students.

The school is not required to maintain separate fiscal accounting records by program that identify the specific activities supported by those particular program funds. It must, however, maintain records demonstrating that the Schoolwide program addresses the intent and purposes of each Federal education program whose funds were consolidated.

A school that chooses to use funds from such other programs shall not be relieved of the requirements relating to health, safety, civil rights, student and parental participation and involvement, services to private school children, maintenance of effort, comparability of services, uses of Federal funds to supplement, not supplant non-Federal funds or the distribution of funds to SCDE or districts that apply to the receipt of funds from such programs.

Within the general Schoolwide consolidation authority, a Schoolwide program may consolidate funds received under the following programs only as outlined below:

- Individuals with Disabilities Education Act (IDEA), Part B (with the restrictions in 34 C.F.R. 200.29(c)(3))
- Discretionary (competitive) Grant Programs
- Title I, Part C: Migrant Education (with restrictions in 34 C.F.R. 200.29(c)(1)).
- Title I, Part D, Subpart 2: Prevention and Intervention Programs for Children and Youth Who are Neglected, Delinquent, or At-risk
- Title II, Part A: Preparing, Training, and Recruiting High-Quality Teachers and Principals
- Title III, Part A: English Language Acquisition

SCDE does not currently have any LEAs that have consolidated funds in a schoolwide school. If an LEA wants to participate in schoolwide funding consolidation, please contact the OFSA about initiating a pilot program.

Evidence-Based Practices

The ESEA 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 identify high-quality programs and practices.

- [Using Evidence to Strengthen Education Investments](#) (ED Non-Regulatory Guidance 2016). This guidance is designed to help State education agencies (SEAs), LEAs, schools, educators, partner organizations, and other stakeholders choose and implement interventions that improve student outcomes.
- [Education Resources Information Center](#) (ERIC) Free access to bibliographic records of journal articles and other education-related materials, including links to full text if available. Sponsored by ED, Institute of Education Sciences (IES).
- [Identifying and Implementing Educational Practices Supported by Rigorous Evidence: A user-friendly guide to help educators distinguish practices supported by rigorous evidence from those not.](#) (ED, December 2003)
- [National Center for Education Statistics](#) (NCES) Located within ED and the Institute of Education Sciences, NCES is the primary Federal entity for collecting and analyzing educational data.
- [What Works Clearinghouse](#) Reports on the effectiveness of educational programs, products, practices, and policies.
- [Innovation Station](#) The menus offer research-based best practices for students in grades K–12.

Staff Qualifications

All teachers and paraprofessionals working in a program supported with Title I, Part A funds must meet all State certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification. ESEA Sec. 1111(g)(2)(j).

Required LEA Set-Asides

The funds to be reserved include:

- *Administrative Expenses:* An LEA must set aside sufficient funds to administer the Title I program for public school students. 34 C.F.R. 200.77.
- *Homeless children and youths.* ESEA Sec. 1113(c)(3)(A)(i).

- *Equitable services for private school children.* An LEA must apportion an amount for Title I services to students attending private schools proportionate to the amount of the LEA's allocation generated by those students. This set-aside must be calculated before any expenditures or transfers are made by the LEA. ESEA Sec. 1117(a)(4)(A).
- *Parent and family engagement.* An LEA that received more than \$500,000 for Part A programs must set aside at least 1% of its allocation for activities to conduct the parent and family engagement activities described in Sec. 1116(a)(3)(A) of the ESEA. Of that 1% reserved, LEAs must distribute 90 percent to participating schools for parent and family engagement activities. ESEA Sec. 1116(a)(3)(C).

Optional Set Asides

Additional funds that may be reserved include:

- *Neglected and delinquent students.* As it does for homeless students, before allocating funds to individual schools, LEAs must reserve Title I, Part A funds to provide services to children in local institutions for delinquent children and neglected and delinquent children in community day programs that are comparable to services provided to students attending Title I schools. ESEA Sec. 1111(d)(1)(D)(v).
- *Professional Development.* LEAs may reserve a necessary amount of Title I funds at the district level to accomplish the professional development goals of the Title I program throughout the district. In addition, an individual school would also be authorized to use a portion of its Title I allocation to fund professional development for the Title I program at that school.
- *Early childhood.* LEAs have the option to reserve funds for early childhood education. ESEA Sec. 1113(c)(5). This is an optional set-aside.
- *Pre-Kindergarten Programs.* Sec. 1114(c) of the ESEA allows a schoolwide program to use Title I, Part A funds to establish or enhance preschool programs for children under the age of 6.

A Title I preschool program is a program for which an LEA or school uses Title I funds, in whole or in part, to improve educational outcomes for eligible children from birth to the age at which the LEA provides a free, public elementary education. ESEA Secs. 1113(c)(5), 1114(c), and 1115(c)(1)(A)(ii); 34 C.F.R. 77.1. Such a program is designed to prepare eligible children with the prerequisite skills and dispositions for learning that will enable them to benefit from later school experiences.

RESOURCE:

Serving Preschool Through Title I, Part A Guidance

- *Incentives and rewards.* An LEA may reserve up to 5% of its Part A allocation for financial incentives and rewards to teachers who serve students in Title I schools identified for comprehensive or targeted support intervention. ESEA Sec. 1113(c)(4). This is an optional set-aside.

Note: Since the reservation of funds by an LEA reduces the funds available for distribution to participating areas and schools, the LEA must consult with teachers, pupil services personnel (where appropriate), principals, and parents of children in participating schools in determining, as part of its LEA plan, what reservations are needed.

Equitable Services to Private Schools

The purpose of Title I of the ESEA is to provide all children a significant opportunity to receive a fair, equitable, and high-quality education and to close educational achievement gaps. (ESEA section 1001). Each LEA that receives Title I funds identifies public school attendance areas and schools with high concentrations of children from low-income families as eligible to participate in Title I programs. (ESEA section 1113).

ESEA section 1117 requires participating LEAs, in consultation with appropriate private school officials, to provide eligible children attending private non-profit elementary and secondary schools, their teachers, and their families with Title I services or other benefits that are equitable to those provided to eligible public school children, their teachers, and their families. Eligible private school children reside in a participating Title I public school attendance area and are low-achieving. Low-income students who reside in a served Title I, Part A attendance area and attend private schools generate funds for the equitable services program. However, the private school children who receive Title I services are determined by (1) residence in a participating public school attendance area and (2) educational needs. Poverty is not a criterion for receiving services.

The Title I services provided by the LEA for private school participants are designed to assist children who are failing or those who are most at risk of failing to meet high achievement standards and supplement the educational services provided by the private school. These services may be provided by the LEA or by a contractor independent of the private school and any religious organization. Title I services or benefits must be secular, neutral, and non-ideological.

Consultation

Contacting Private Schools

Each LEA is responsible for contacting all private schools within the district that might have students eligible to participate in Title I programs—i.e., students who live in a participating Title I public school attendance area in the LEA but attend private school. The LEA is also responsible for contacting private schools outside the district if the LEA has reason to believe students who reside in a participating Title I public school attendance area attend private schools outside of the LEA.

Letters should be sent to private schools in a designated timeframe by the LEA to give enough time to properly consult with a private school that would like to participate in Title I before the start of the school year. To determine which schools to contact, please consult the SCDE Website for a list of private schools in the state, such as the [SC Private School Listing](#).

Please be aware that the SCDE works diligently to keep these lists up to date, but it is not all-inclusive since private schools can be created or disbanded without reporting to the SCDE. You may also want to consult other Websites such as <http://www.scisa.org/> (the **South Carolina Independent Schools Association**), <http://www.christianeducation.org/> (**South Carolina Christian Schools**), your local Chamber of Commerce, and use local knowledge concerning private schools in your area.

A [participation letter](#) must be sent to solicit the involvement of each identified private school to take part in Title I if the private school has a student(s) from your district who would have been enrolled in a Title I-served school in your district. Please address the letter to a person of authority at the school, such as the headmaster, who contains the following information:

- 1) The letter should contain information on Title I and the private schools' potential to participate in Title I.
- 2) There is a need for a consultation meeting with the district if the private school decides to participate in Title I.

The district is required to maintain records to show a good-faith effort in inviting the private schools to participate in Title I support. (See sample agenda and letter to Private School Headmaster with return participation documentation at the end of this section.)

Consultation Meetings

Annually, an LEA must contact officials of private schools with children who reside in the LEA, regardless of whether the private school they attend is in the LEA. To accomplish this, the LEA must extend an invitation to officials of the private schools and convene a meeting with them at which LEA officials explain the intent of Title I, the roles of public and private school officials, and provide opportunities for the private school officials to ask questions. It is not adequate consultation to merely send a letter to officials of the private schools explaining the intent of Title I. (It is appropriate to send a letter by certified mail with a return receipt requesting to offer services initially, but a meeting must also be offered.)

A unilateral offer of services by an LEA with no opportunity for discussion is also inadequate for consultation. Only after discussing key issues relating to the provision of Title I services with private school officials should the LEA make its final decisions concerning the Title I services to be provided to eligible private school children, their teachers, and their families.

Consultation by an LEA must include meetings between the LEA and appropriate private school officials. It must occur before the LEA makes any decision that affects the opportunity for eligible private school children, their teachers, and their families to

participate in Title I programs. For example, if the LEA signs teacher contracts or orders supplies and equipment for the Title I program in the spring, the LEA must consult with the appropriate private school officials before signing those teacher contracts with Title I teachers or ordering supplies and equipment to provide Title I services for private school students.

Consultation must begin before the start of the school year and occur on an ongoing basis, which means that an LEA must meet with appropriate private school officials throughout the year to discuss the implementation of services and assess the provided services.

Under 34 C.F.R. 200.63, consultation must, at a minimum, address the following issues:

- How the LEA will identify the needs of eligible private school children.
- What services the LEA will offer to eligible private school children.
- How and when will the LEA make decisions about the delivery of services.
- How, where, and by whom the LEA will provide services to eligible private school children.
- How the LEA assess academically the services to private school children under 34 C.F.R. 200.10, and how will the LEA use the results of that assessment to improve Title I services
- The size and scope of the equitable services that the LEA will provide to eligible private school children and, consistent with 34 C.F.R. 200.64, the proportion of its Title I funds that the LEA will allocate for these services and how the LEA determines the proportion of funds.
- The method, or the sources of data, that the LEA will use (under 34 C.F.R. 200.64) to determine the number of private school children from low-income families residing in participating public school attendance areas, including whether the LEA will extrapolate data if a survey is used; and
- The services the LEA will provide to teachers and families of participating private school children.

Consultation must also include:

- Discussion of service delivery mechanisms the LEA will use to provide services and

- Thorough consideration and analysis of the views of the private school officials on whether the LEA should contract with a third-party provider. If the LEA disagrees with the views of the private school officials on that issue, the LEA must provide in writing to those officials why the LEA has chosen not to use a third-party contractor.

Affirmation Letter

Each LEA must maintain and provide the SEA with written affirmation, signed by officials of each participating private school or appropriate representatives of the private school officials, that the required consultation has occurred.

The affirmation should be signed when consultation on the planning and design of the following year's program has been completed. The exact timing of signing the affirmation should be a topic of consultation. The SEA has the flexibility to require LEAs to submit written affirmations during the annual Title I application process, which is July 1st. After the affirmation is obtained, consultation continues through the implementation and assessment of services. A copy of the completed affirmations should be emailed to the SCDE at EquitableServices@ed.sc.gov. (A copy of the [affirmation letter](#) to be signed by district and private school officials is provided at the end of the section.)

Proportionate Share

Funds are allocated for low-income children attending private schools. To provide equitable services to eligible private school areas, the LEA must reserve the amounts generated by these low-income children.

The proportionate share for equitable services is based on the number of children from low-income families residing in the LEA's Title I-A attendance areas who attend private schools. The proportionate share of funds is determined based on the total amount received by the LEA under Title I-A and before any allowable expenditures or transfers by the LEA.

An LEA determines the proportionate share of funds available for equitable services as follows:

- 1) Based on prior years' data, determine the total number of children from low-income families residing in each participating public school attendance area who attend public and private schools
- 2) Determine the overall proportion of these children who attend private schools
- 3) Apply this proportion to the current year's allocation to determine the funds available for equitable services.

In addition, LEAs must reserve at least one percent of their Title I allocation for parent & family engagement activities if the LEA's entitlement exceeds \$500,000. LEAs must calculate the proportionate share of one percent of the Title I allocation.

Determining the Number of Low-Income Private School Children

A LEA is allowed to calculate the number of private school children who are from low-income families in several ways:

- 1) Using the same measure of poverty as the LEA uses - if private schools offer free and reduced-priced lunches, then the same measure of poverty may be used.
- 2) Using comparable data from a different source – in many instances, districts create a survey that looks similar to the USDA free-and reduced-priced lunch form. In creating this survey, the income threshold must be the same as the form used to determine low-income students in public schools. (See the example listed below)
- 3) Using comparable data and extrapolating if complete data is not available – an LEA may use a survey as described in number two above. However, if all surveys are not returned, an LEA, after obtaining income data from a representative sample of families, may extrapolate those data to the entire private school student population if complete actual data are unavailable. The LEA should ensure the data represents the district's private school students.
- 4) Using proportionality – an LEA may apply the low-income percentage of each participating Title I school to the number of private school children who reside in that school's attendance area. To do this, an LEA will need the addresses and grade levels of those students attending private schools that are participating in the Title I program.

Note: The only information an LEA needs to collect for determining low-income students in private schools is the following:

- 1) *address to determine residence in a participating Title I school attendance area.*
- 2) *grade level of each child; and*
- 3) *income level of parents (for 1-3 above).*

Allocation of Funds to Provide Schools

The options to allocate funds attributed to each participating private school are discussed below. **However, it is important to note that the private school never receives funding**

and is not a subrecipient or grant recipient. They only receive services provided by the LEA using the allocations determined by the district.

Allocations to schools may be provided as follows:

- **School-by-School:** Provide equitable services to eligible children in each private school with the Title I funds generated by the children from low-income families who reside in participating Title I public school attendance areas and attend that private school.
- **Pooling within an LEA:** Provide equitable services to eligible children attending a private school that is part of a group of private schools (such as a group of schools under the authority of a single organization) by pooling the Title I funds generated by children from low-income families who reside in participating Title I public school attendance areas and attend a private school in the group. In consultation with appropriate private school officials, the LEA must establish criteria to determine the eligible private school students in the greatest educational need to receive services. The services provided to eligible children attending a particular private school do not depend on the funds generated by children from low-income families in that school; instead, the services are based on educational needs. If private school officials representing different groups of private schools request pooling, the LEA may establish a separate pool for each requesting group. To pool funds, the LEA must have an agreement with each school participating in the pooling, as the LEA may not do this unilaterally.
- **Pooling across LEAs:** Because eligibility for Title I services is based on a child's residence and not where the child attends school, it is common that multiple LEAs have a responsibility to provide services to eligible children who attend the same private school, making provision of those services through pooling across LEAs potentially more educationally effective and efficient than by each LEA providing services to eligible students in the same private school. Thus, multiple LEAs may pool the Title I funds generated by their private school children from low-income families who reside in a participating Title I public school attendance area to serve eligible low-achieving private school children who reside in those LEAs. In other words, low-achieving private school children in greatest need who reside in a participating Title I public school attendance area in any applicable LEAs may be served with pooled funds. The LEAs, in consultation with appropriate private school officials, must establish criteria to determine the eligible private school students in the greatest educational need to receive services. As with pooling within the LEA, it requires complete agreement by each participating school and cannot be done unilaterally by the LEA(s).

- The following example shows the differences among the school-by-school approach, pooling within an LEA, and pooling across LEAs. In this example:
- LEA A and LEA B are responsible for providing equitable services to low-achieving children who reside in a participating Title I public school attendance area within their boundary and attend Private Schools 1 and 2.
- Private school children from low-income families who reside in a participating Title I public school attendance area in LEA A generate \$50,000 for equitable services in Private School 1 and \$25,000 for equitable services in Private School 2.
- Private school children from low-income families who reside in a participating Title I public school attendance area in LEA B generate \$5,000 for equitable services in Private School 1 and \$1,000 for equitable services in Private School 2.

Scenario 1: No pooling

- Eligible low-achieving private school children receive services based on Title I funds generated by children from low-income families in their school, as determined by the LEA where they live. For example, eligible private school children in Private School 1 who live in LEA A receive \$50,000 in services, while their Title I eligible classmates who live in LEA B receive only \$5,000. This is true even if more low-achieving students reside in LEA B.

Scenario 2: Pooling Title I funds among private schools within a single LEA

- After consultation, appropriate private school and LEA officials agree to pool Title I funds within LEA A and LEA B. There is \$75,000 available to serve low-achieving private school children in both Private School 1 and Private School 2 who live in LEA A, and \$6,000 available to serve low-achieving private school children in both private schools who live in LEA B. Even if more low-achieving children reside in LEA B than LEA A, there is only \$6,000 available to serve these students.

Scenario 3: Pooling Title I funds among private schools across LEAs

- After consultation, appropriate private school and LEA officials agree to pool Title I funds across both LEA A and LEA B. There is then \$81,000 available to serve, based on uniform criteria of educational need, the lowest-achieving eligible private school children who attend Private Schools 1 and 2 regardless of whether they reside in LEA A or LEA B and without regard to how much funds children from low-income families within their private school generate towards the pool. Eligible low-achieving children may receive Title I services even if their school has few or no children from low-income families who generate Title I funds.

Approval of Application

The SEA does not consider for approval an application for a Title I program that does not provide an opportunity for the appropriate participation of private school children. To demonstrate proper consultation and involvement of private school officials, districts

should maintain appropriate documentation such as minutes of meetings, written correspondence, surveys, etc.. Consultation with private school officials must occur before important decisions are made during all project design and development phases.

The submission of the affirmation is now required. The LEA must have the signature of the private school official and the LEA. Once completed, the LEA must submit the affirmation via email to equitable.services@ed.sc.gov. The SCDE does not approve the affirmation but collects the documentation.

Eligibility for Equitable Services

Student eligibility for Title I services for private school children is determined by (1) residence in a participating public school attendance area and (2) educational need (identified as children who are failing or those who are most at risk of failing to meet high achievement standards). Poverty (free and reduced lunch status) is not a criterion. Section 1115 of the ESEA requires the LEA to use multiple educationally related, objective criteria to determine educational need. In consultation with private school officials, an LEA must establish multiple, educationally related, objective criteria to determine which private school children are eligible for Title I services and, within the eligible group, which children will be served.

Educationally related criteria may include:

- achievement tests.
- teacher referrals and recommendations based on objective, educationally related criteria; and
- grades.

Children from preschool through grade two are selected solely based on such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures.

Example:

LEA and private school officials decide that the criteria for private school students are (1) test scores on a nationally norm-referenced test given annually by the private school and (2) teacher judgment. The criteria should provide accurate and unduplicated information. The private school principal provides the names, addresses, and grades of the private school children meeting the agreed-upon criteria. The LEA checks the addresses of the children on the list to determine those who live in participating public school attendance areas. Based on established educational criteria, the LEA then selects, among those who are eligible, those private school children who are failing or those who are most at risk of failing to meet high achievement standards.

RESOURCES FOR EQUITABLE SERVICES

[Equitable Services to Private Schools: General Information](#)

[Affirmation of Consultation](#)

[Needs Assessment](#)

[Title I, Part A – Private School to Parent Letter, Version 1](#)

[Title I, Part A – Private School to Parent Letter, Version 2](#)

[Title I, Part A – Family Income Survey](#)

[Complaint Process](#)

[Evaluation of Equitable Services](#)

Parent and Family Engagement

LEAs may receive Title I funds only if they implement programs, activities, and procedures for involving parents and family members in Title I programs, consistent with Section 1116 of the ESEA. Districts must plan and implement these programs, activities, and procedures with meaningful consultation with parents and family members of children participating in Title I programs. ESEA Sec. 1116(a)(1)

RESOURCES:

[District-level Notification Requirements](#)

[School-level Notification Requirements](#)

Set-Aside for Parent and Family Engagement

Each LEA that receives a Title I allocation of over \$500,000 must set aside at least 1 percent of that allocation to conduct required parent and family engagement activities. (Parents and families of children receiving Title I services must be involved in the decisions regarding the set-aside funds allotted for parent and family activities. ESEA Sec. 1116(a)(3)(B).

The LEA must then distribute at least 90 percent of this set-aside to its public schools, prioritizing high-need schools. ESEA Sec. 1116(a)(3)(C). LEAs do not have to distribute parent and family engagement funding proportionately to the schools' share of other Title I funds. An LEA may use any one or a combination of factors to distribute parent and family engagement funds to the schools. For example, it may allocate funds to schools in improvement status or base its allocation on the LEA's annual parent and family engagement evaluation results. However, as with all aspects of a district's Title I program, parents must be involved in decisions regarding the distribution of Parent and Family Engagement funds.

LEAs must use their set-aside funds on at least one of the following parent and family engagement activities and strategies:

- Support schools and nonprofit organizations' efforts to provide professional development for LEA and school personnel about parent and family engagement strategies.
- Support programs that reach parents and family members at home, in the community, and at school.
- Disseminate information on best practices focused on parent and family engagement, especially those aimed at increasing the engagement of economically disadvantaged parents and family members.
- Collaborate or provide subgrants to schools to collaborate with community-based or other organizations or employers with a record of success in improving and increasing parent and family engagement.
- Engage in any other activities and strategies the LEA decides are appropriate and consistent with the district's parent and family engagement policy. ESEA Sec. 1116(a)(3)(D)(i)-(v).

If an LEA decides to set aside an amount greater than 1 percent of its total Title I allocation, the LEA is still only required to distribute 90 percent of 1 percent of its total Title I allocation to its schools.

If the LEA provides equitable services to private schools, it must also set aside 1% of its equitable services set aside, as discussed above, for parent and family engagement activities for parents and families of participating private school students. ESEA Sec. 1117(a)(1)(B).

Compliance Checklist

There are numerous parent and family engagement requirements in Title I, Part A. This compliance checklist will help remind LEA and school personnel of these requirements and ensure they are completed annually.

- **Parent and Family Engagement Policies** – Each LEA and school that receives Title I Part A funds or services must develop jointly with, agree on with, and distribute to parents of participating children, written Parent and Family Engagement policies that contain information required by the Elementary and Secondary Education Act. ESEA Sec. 1116(a)(2); 1116(b)(1); 1116(c)(3).
- **Parent-School Compacts** – A written commitment must be developed each year indicating how all school community members, including parents, teachers, principals, students, and concerned community members, agree to share responsibility for student learning. ESEA Sec. 1116(d).
- **Annual Parent Meeting** – Each year, the Title I program must host a meeting for parents to explain the Title I program is and how Title I students will be assessed. It should also include information on how parents can be involved in their children’s education. ESEA Sec. 1116 (c)(1)-(2).
- **Assessing the Parent and Family Engagement Component** – The Title I program must assess its parent and family engagement component at the end of each school year. Parents are asked to participate in a formal meeting, complete a survey, and give their input. ESEA Secs. 1116(a)(2)(D); 1116(c)(1).
- **Training Parents** – The Title I program allows parents to partner with the school to promote their children’s education at school and home. ESEA Secs. 1116 (c)(4) -(A) and (C), (e)(2).
- **Annual Review Meeting** – Each year, Title I requires a review of the entire Title I program to be conducted. Parents are to be informed of the results of this meeting. ESEA Sec. 1116 (c)(3).
- **Assessment Information:** Share frequent student progress reports with parents and an interpretation of the results. Seek parental input into decisions involving ways to increase academic achievement. ESEA Secs. 1116(d) and (c)(4)(B).
- **Parents’ Right to Know Clause** – Parents have the right to know the qualifications of their children’s teacher. At the beginning of each school year, the LEA must notify parents of such information. Parents should be informed if the child is taught for four or more weeks by a teacher who does not meet applicable State certification or licensure requirements at the grade level and/or subject level area in which the teacher has been assigned. ESEA Sec. 1112(e)(1)(A)(i)-(ii),
- **School/District Report Cards** – Parents must be notified annually regarding the availability of the school and district report cards that include information on the district as a whole and each school served by the district. ESEA Sec. 1111 (h)(2)(A).

- **LEP Parent Notification** – Parents must be notified if their children are placed in a program for LEP students. ESEA Sec. 1112(e)(3)(A).
- **Reservation of Funds** – If a district’s Title I allocation is \$500,000 or more, they are then required to set aside 1% of its district’s Title I allocation for Parent and Family Engagement. Only 10% of these funds may be used at the LEA level; 90% must be given to the participating schools. ESEA Sec. 1116(a)(3)(C); Guidance C-13, C-14, C-15 and C-16.

Suggested Schedule of Parent and Family Engagement Practices	
September	<ul style="list-style-type: none"> • Explanation of the School Title I Program • Title I Districts-School Parental & Family Engagement Policies & School-Parent Compact • Annual Parent Meeting • Volunteering programs
October	<ul style="list-style-type: none"> • Parent-Teacher Conferences
February	<ul style="list-style-type: none"> • Planning Team Meeting • Review programs • Review funding • Review needs • Review research • Seek parental input
March	<ul style="list-style-type: none"> • Final preparations for State testing and other annual testing programs
April	<ul style="list-style-type: none"> • Annual Review Meeting
May	<ul style="list-style-type: none"> • Summary of Annual Review • Planning team finalizes reviews and parent & family engagement activities for upcoming Title I project
June	<ul style="list-style-type: none"> • Title I application is submitted to the State Department via GEMS

Ensuring the Educational Stability of Children in Foster Care

To help students in foster care reach their full academic potential, LEAs must address their unique social, emotional, physical, behavioral, and mental health needs. This means ensuring that schools have the necessary tools to assist students in foster care and address any barriers that may prevent them from fully accessing and experiencing a supportive educational environment.

The Title I foster care provisions apply to ALL children in foster care who are 21 or younger and entitled to a free public education through grade 12, enrolled in schools in the SEA.

“Foster care” means 24-hour substitute care for children placed away from their parents or guardians and for whom the child welfare agency has placement and care responsibility. 45 C.F.R. 1355.20(a). Under this definition, “foster care” includes, but is not limited to, placements in:

- Foster family homes.
- Foster homes of relatives (also known as “formal kinship care”).
- Group homes.
- Emergency shelters.
- Residential facilities.
- Childcare institutions; and
- Pre-adoptive homes.

What is NOT considered foster care?

- Informally placed with relatives without child welfare responsibility

LEA Foster Care Liaison and Their Responsibilities

Each school LEA has designated a Foster Care Point of Contact (POC) or liaison to ensure agency collaboration. Responsibilities for the foster care POC include the following activities:

- Developing a process for completing a best interest determination (BID).
- Documenting outcomes of BID processes.
- Resolving disputes related to BID processes and school of origin transportation.
- Facilitating the transfer of records and ensuring immediate enrollment when students in foster care change school placements.
- Facilitating data sharing with child welfare agencies, consistent with the Family Educational Rights and Privacy Act (FERPA) and other Federal or State privacy laws, regulations, and policies.

- Developing and coordinating the implementation of the local school of origin transportation procedures.
- Ensuring that students in foster care are enrolled in and regularly attending school; and
- Providing professional development and training to school-based staff on the Title I educational stability provisions and the unique educational needs of students in foster care.

The State Department of Social Services (DSS) has designated a statewide POC with four Regional Educational Specialists in the Midlands, Upstate, Pee Dee, and Low Country. Additionally, each school district should partner with its local county DSS to help ensure educational stability for children in foster care in its county.

RESOURCES:

South Carolina Foster Care Points of Contact

Best Interest Determination (BID)

What is Best Interest Determination (BID)?

To meet the requirements of the Fostering Connections Act and ESEA, a BID must be completed for documentation that must be maintained in the child welfare case file for every student regarding the best interest determination for educational stability. Fostering Connections and ESWA require that every student remain in their school of origin unless it is determined that it is not in their best interest. ESEA Sec. 1111(g)(1)(E). The decision as to what is in the student's best interest will be decided at a BID meeting. A collaboration, including but not limited to the local DSS and LEA, must consider all factors relating to a student's best interest when determining whether remaining in their school of origin is in their best interest. These factors can include the appropriateness of the current educational setting and the proximity of the placement. ESEA Sec. 1111(g)(1)(E)(i). At a minimum, a representative from both schools, the DSS caseworker, and the educational surrogate (if applicable) are required to participate in a BID meeting. Others with insight into the student's best educational interest (including the student) are encouraged to participate. A BID should occur when (1) a student enters the custody of the child welfare agency or (2) a placement change is necessary. While the Title I educational stability provisions do not apply when a student exits foster care, SEAs and LEAs are encouraged to prioritize educational stability for these students.

Who initiates the BID process?

The local DSS caseworker is responsible for initiating the BID meeting. The case worker should collaborate with the LEA to schedule a BID meeting before the student enters custody or a placement change and invite the potential placement LEA if a move is likely. If a student has an IEP or a Section 504 plan, the relevant school staff members should participate in the best interest determination process. If the student is a Multilingual Learner, appropriate educators may need to be involved in the best determination process. If possible, the BID meeting should take place within three school days. To the extent feasible and appropriate, the student must remain in their school of origin while this determination is being made. ESEA Sec. 1111(g)(1)(E)(i). If the student does not remain at the current school, a copy of the BID should be given to the new school of residence upon enrollment. Given these coordination requirements, the LEA and DSS should make every effort to agree on the appropriate school placement of children in foster care. If there is a dispute, the dispute should be resolved as quickly as possible to minimize disruption to a student's education, and educational agencies are encouraged to design dispute resolution procedures that can be completed within five business days. The dispute resolution process should be fair to all parties and should allow resolution to be reached in an expeditious manner. *The [BID document is here](#).*

How is the decision made?

There is a list of questions to help guide the placement discussion ([see pages 2 and 3](#)). Factors considered during a BID should be student-centered.

Title I LEA Plans and Transportation

Transportation for Foster Care Children

School of origin transportation is transportation to and from the school in which a child in foster care is enrolled at the time the child enters foster care or experiences a change in placement. ESEA Sec. 1112(c)(5)(B). The Title I educational stability provisions require LEAs receiving Title I funds to collaborate with child welfare agencies to develop and implement clear written procedures governing how transportation to maintain students in foster care in their schools of origin will be provided, arranged, and funded for the duration of the student's time in foster care. ESEA Sec. 1112(c)(5)(B). These procedures must ensure that:

- Students in foster care will promptly receive school of origin transportation in a cost-effective manner and in accordance with Section 1112(c)(5)(B)(i) of the ESEA; and

- If there are additional costs under Section 1112 (c)(5)(B) of the ESEA incurred in providing transportation to the school of origin, the LEA will provide such transportation if:
 1. The local child welfare agency agrees to reimburse the LEA for the cost of such transportation.
 2. The LEA agrees to pay for the cost; or
 3. The LEA and local child welfare agency agree to share the cost.
 4. ESEA Sec. 1112(c)(5)(B)(ii).

LEAs, in collaboration with child welfare agencies, should provide school of origin transportation to students in foster care that is age and developmentally appropriate. Additionally, a charter school considered an LEA by the SEA must meet the Title I educational stability provisions' school of origin transportation requirements on the same basis as any other LEA.

It is best practice for LEAs to work on these policies and procedures in collaboration with the local county DSS office. The LEA's foster care POC should also consult with and coordinate with other Federal program staff, including Title I, special education, and transportation. Additionally, during the BID meeting, [page 4](#) should be utilized when developing the plan for student transportation. Written transportation procedure for a LEA could outline:

- A list of approved modes of transportation that may be available for students in foster care, including low- or no-cost options and options that may be unique to an LEA's local context.
- The timeline for providing transportation.
- A cost-sharing agreement between LEAs and relevant child welfare agencies to cover additional transportation costs incurred in providing school-of-origin transportation.
- Procedures to ensure student safety.

LEAs are encouraged to work with other LEAs and relevant child welfare agencies with which they regularly interact to establish inter-LEA transportation procedures.

Title I Part A Funding for Foster Care Transportation

In addition to State and local funds that may be available for providing school-of-origin transportation, certain Federal funds can address additional school-of-origin transportation costs. Districts are not required to set aside Title I funds for the additional transportation costs of foster care children. However, it is an allowable supplemental LEA set-aside. Title I coordinators should consult with their LEA foster care point of contact and the Title I planning team to determine if and how much should be set aside for foster care

transportation. Title IV-E Federal funds are available to assist with the additional school-of-origin transportation costs for students who are eligible for Title IV-E foster care maintenance payments (i.e., those students who meet the specific requirements in section 472 of the ESEA). This is the primary source of federal funding available to child welfare agencies for this purpose. Additionally, an LEA may use IDEA funds to pay for additional school of origin transportation costs if the student in foster care has an IEP and the IEP Team determines that the student requires transportation as a related service to assist a student with a disability to benefit from special education.

Please note, however, that funds reserved for comparable services for homeless children and youth under Section 1113(c)(3)(A)(i) of the ESEA may not be used to provide transportation needed to maintain children in foster care in their schools of origin.

Immediate Enrollment

When a determination is made that it is not in a student's best interest to remain in the school of origin, the student is immediately enrolled in the new school, even if the student cannot produce records normally required for enrollment. The enrolling school shall immediately contact the school that was last attended to obtain relevant academic and other records. Immediate enrollment means that, if a BID process indicates that it is in the best interest of a foster care child to change schools, the student is fully enrolled as soon as practicable (e.g., within three business days) to avoid educational discontinuity. A student is not fully enrolled if the student is not attending school or fully participating in classes, extracurricular activities, and out-of-school and summer opportunities.

Documents, including the best interest determination documentation and the immediate enrollment form, will be used to assist in a smooth transition. Child welfare and school districts should work together to make informed decisions about children and remove barriers that may hinder enrollment in the appropriate school placement. Once a student in foster care is immediately enrolled in their new school, the student and their caregivers are responsible for providing the documents typically required for enrollment in the school. Enrollment delays can negatively impact attendance and lead to other adverse consequences for students in foster care, such as being enrolled in inappropriate classes or not receiving necessary academic services. SEAs and LEAs are required to ensure they do not impede or delay enrollment. As such, LEAs are encouraged to periodically review and revise school enrollment policies and practices to remove any barriers to immediate enrollment and records transfer for students in foster care.

Data Collection and Reporting

LEAs and child welfare agencies are encouraged to use data to guide programming for students in foster care and improve academic outcomes for the student population. While the Title I educational stability provisions in the ESEA do not include specific data-related requirements, other Federal education and child welfare requirements do involve data related to students in foster care. LEA and child welfare agencies are encouraged to establish data-sharing routines (aligned with all Federal privacy laws) to drive program implementation. This section summarizes how data can be collected, shared, and used to support the educational stability and success of students in foster care, as well as the applicability of Federal student privacy laws.

Educational agencies are encouraged to use data to drive program implementation and to ensure that funded activities (i) are tied to the unique needs of program beneficiaries and (ii) achieve a program's desired impact. Through data-driven program implementation, SEAs and LEAs can:

- Track academic progress over time for individual students in foster care and a cohort of all students in foster care.
- Improve the delivery of academic support and other wraparound services to students in foster care.
- Improve the quality of data used to fulfill Federal and State reporting requirements.
- Strengthen implementation of the Title I educational stability provisions.
- Maximize the impact of funding available to support students in foster care; and
- Guide cross-system collaborations.

Monitoring and Compliance

Since the foster care provisions of Title I, Part A require joint decision-making and collaboration between child welfare agencies (CWAs) and educational agencies, efforts to collaborate must be documented.

Evidence of compliance with the ESEA **must** include the following:

- Completed LEA written transportation procedures
- Evidence that documents the collaboration of LEA and local CWAs, best interest determination, immediate enrollment, collaboration between agencies regarding transportation, etc.

Required:

- BID forms (signed and dated)
- Immediate enrollment forms indicating the date of enrollment (signed and dated)

Optional:

- Meeting invitations
- Sign-in sheets
- Agendas
- Meeting minutes
- Emails that document collaboration
- Other relevant evidence that documents collaboration between the LEA and local CWA

An additional source of collaboration includes [the End of the Year Foster Care Survey](#). This survey will collect data on Foster Care beyond graduation rates and academic achievement. The survey will accurately demonstrate the workload/financial strain associated with Foster Care requirements and reveal the foster care program's needs, gaps, and pressure points.

RESOURCES

[Joint Guidance for Ensuring School Stability of Children in Foster Care.](#)

[Federal Non-Regulatory Guidance](#)

Education for Homeless Children and Youth (EHCY) and Coordination with Title I, Part A (TIPAH)

- “Homeless children and youth” means children and youth who lack a fixed, regular, and adequate nighttime residence, including those who are sharing the housing of others due to loss of housing, economic hardship, or a similar reason; staying in motels, trailer parks, or camp grounds due to the lack of an adequate alternative; staying in shelters or transitional housing; or sleeping in cars, parks, abandoned buildings, substandard housing, or similar settings. 42 U.S.C. 11434a(2).
- “Unaccompanied youth” includes homeless children and youth who are not in the physical custody of a parent or guardian. 42 U.S.C. 11434a(6).

MV District Liaison Responsibilities

Every LEA must designate a liaison for students experiencing homelessness who can carry out the duties described in the law. 42 U.S.C. 11432(g)(1)(J)(ii). The district liaison is one of the primary contacts between homeless families, school staff, district personnel, shelter staff, and other service providers. The district liaison coordinates services to ensure that homeless children and youth are identified and immediately enrolled in school. Each LEA liaison for homeless children and youths shall ensure that:

- (i) School personnel identify homeless children and youths through outreach and coordination with other entities and agencies.
- (ii) Homeless children and youths are enrolled in and have a full and equal opportunity to succeed in the schools of that local educational agency.
- (iii) Homeless families and homeless children and youths have access to and receive educational services for which such families, children, and youths are eligible, including services through Head Start programs (including Early Head Start programs) under the Head Start Act (42 U.S.C. 9831 et seq.), early intervention services under Part C of the Individual with Disabilities Education Act (20 U.S.C. 1431 et seq.), and other preschool programs administered by the local educational agency;
- (iv) Homeless families, homeless children, and youths receive referrals to health care services, dental services, mental health and substance abuse services, housing services, and other appropriate services.
- (v) The parents or guardians of homeless children and youths are informed of the educational and related opportunities available to their children and are provided with meaningful opportunities to participate in their children's education.
- (vi) public notice of the educational rights of homeless children and youths is disseminated in locations frequented by parents or guardians of such children and youths, and unaccompanied youths, including schools, shelters, public libraries, and soup kitchens, in a manner and form understandable to parents and guardians of homeless children and youths, and unaccompanied youths.
- (vii) enrollment disputes are mediated in accordance with paragraph (3)(E); and
- (viii) the parent or guardian of a homeless child or youth, and any unaccompanied youth, is fully informed of all transportation services, including transportation to the school of origin, as described in paragraph (1)(J)(iii), and is assisted in accessing transportation to the school that is selected under paragraph (3)(A).
- (ix) school personnel providing services under this subtitle receive professional development and other support; and
- (x) unaccompanied youths – are enrolled in school; have opportunities to meet the same challenging State academic standards as the State establishes for other children and youth, including through implementation of the

procedures under paragraph (1)(F)(ii); and are informed of their status as independent students under Section 480 of the Higher Education Act of 1965 (20 U.S.C. 1087vv) and that the youths may obtain assistance from the local educational agency liaison to receive verification of such status for purposes of the Free Application for Federal Student Aid described in Section 483 of such Act (20 U.S.C. 1090) have the opportunity to participate in school activities fully. 42 U.S.C. 11432(g)(6)(A).

In meeting these responsibilities, district liaisons must assist homeless children and youth with such activities as the following:

- Enrolling in school and accessing school services.
- Obtaining immunizations or medical records.
- Informing parents, school personnel, and others of the rights of homeless children and youth.
- Working with school staff to ensure that homeless children and youth are immediately enrolled in school pending resolution of disputes that might arise over school enrollment or placement.
- Helping to coordinate transportation services for homeless children and youth, and
- Collaborating and coordinating with the State Coordinator for the Education of Homeless Children and Youth and community and school personnel responsible for providing education and related support services to homeless children and youth.

Coordination with Title I, Part A, and the Education for Homeless Children and Youth

Homeless children and youth are automatically eligible for services under Title I, Part A, regardless of whether they live in a Title I school attendance area or meeting the academic standards required of other children for eligibility. Homeless children and youth may receive Title I educational or support services from Schoolwide and Targeted Assistance school programs.

Comparable and Coordinated Services

An LEA must provide services to each homeless child and youth that are comparable to services offered to other students in the district. These services include public preschool programs and educational programs or services for which a homeless student meets the eligibility criteria, such as programs for children with disabilities, programs for multilingual learners and immigrant students, vocational education, programs for gifted and talented students, before-and after-school programs, school nutrition programs, and transportation.

LEAs are responsible for coordinating with local social service agencies and other service providers and programs, including programs under the Runaway and Homeless Youth Act (42 U.S.C. 5701), and with other districts on issues such as transportation and the transfer of records. Additionally, they must coordinate with housing assistance providers. This coordination aims to ensure that eligible students have access and reasonable proximity to available education and related support services. It is also essential to coordinate efforts to raise the awareness of school personnel and service providers of the effects of homelessness and the challenges that homeless students face.

Specifically, an LEA must reserve funds necessary to provide services to homeless students who attend non-Title I schools, comparable to those provided to students in Title I schools. These services may include providing educationally related support services to homeless children in shelters and other locations where they may live. ESEA Sec. 1113(c)(3)(A). The following sections provide additional information about allowable expenditures.

A LEA receiving Title I, Part A funds must describe how the plan is coordinated with the McKinney-Vento Act in its local plan. The local plan must describe the services provided to homeless children.

Title I, Part A Set-Aside for Homeless Students (TIPAH)

An LEA may determine the TIPAH reservation amount based on a needs assessment that considers the numbers and needs of children and youth experiencing homelessness. The reservation can be used to provide children and youth experiencing homelessness with services not ordinarily provided to other (housed) Title I students.

Uses of funds can include, but are not limited to, a local homeless liaison's salary, expenses, school of origin transportation, and other services to allow children and youth experiencing homelessness to participate fully in school.

While Federal laws and non-regulatory guidance do not address a specific amount of funding per pupil identified, LEAs must ensure that the TIPAH is sufficient to address the needs of students experiencing homelessness. SCDE provides the following guidance for determining a sufficient TIPAH reservation.

- The TIPAH reservation should consider any other grant funding received to serve students experiencing homelessness, including Education of Homeless Children and Youth (EHCY) and other Community-Based Organization (CBO) collaborations.
- LEAs are encouraged to use the MV Needs Assessment, enrollment data, program evaluation, and cost data on expenditures to determine the reservation.

- The LEA should not reserve the same amount of Title I, Part A funds over multiple years when the student count increased or decreased significantly from the previous year.
- An LEA may use a districtwide per-pupil amount for homeless students if this approach yields a sufficient reservation amount for the LEA to meet program requirements.
- An LEA's Title I Set-Aside allocation could include a minimum of \$100 per pupil identified with their Title I Set-Aside. A higher allocation would consist of \$400–\$500 per pupil. For example, if a District's MV-verified count were 30 students, a proposed \$3,000–\$15,000 range would be acceptable for the district's Title I, Part A Set-aside.

Additionally, the reauthorization of the ESEA through ESSA resulted in the removal of 'awaiting foster care' from the definition of McKinney-Vento. An LEA Title I, Part A Set Aside **must not** include costs for Foster Care transportation. Title I, Part A funds can pay for Foster Care transportation. Still, it must be included in a separate Title I, Part A Set Aside to help ensure that the LEA meets its obligations to provide school stability for students in Foster Care.

Use of Title I, Part A Funds to Provide Services to Homeless Students

An LEA may use funds reserved under this section to provide services to eligible homeless students in Title I and non-Title I schools that are comparable to services provided to non-homeless students in Title I schools. Services provided should assist such children in meeting the State's challenging academic content and academic achievement standards.

A LEA has the discretion to use reserved funds to provide a homeless student with services not ordinarily provided to other Title I students and unavailable from other sources.

Allowable Expenses under Title I Part A, Homeless Set-aside:

- Clothing, particularly if necessary to meet a school's dress code or uniform requirement, or for physical education classes
- Student fees that are necessary to participate in the general education program
- Personal school supplies
- Birth certificates are necessary to enroll in school
- Immunizations
- Personal hygiene products
- Food

- Medical and dental services and needs (including glasses and hearing aids)
- Counseling services to address anxiety related to homelessness that impedes learning
- Outreach services to students living in shelters
- Covering the excess cost of the school of origin transportation
- Laundry detergent
- Tutoring, After-School, and Summer School Programs for identified students
- Salaries for McKinney-Vento staff
- Bedding (air mattress, blanket, etc.)
- Transportation to school events and from the after-school program

In line with the intent of Title I, Part A funds are to be used to assist homeless children in meeting the State's challenging academic content and academic achievement standards, but there are specific expenditures that are not allowed. Some examples of these expenditures are listed below.

Unallowable Uses of Funds (including but not limited to)

- Rent/Deposit/Utilities Hotel/Motel stays
- Prom attire
- Expensive non-educational field trips
- Yearbook class rings
- Gift Cards

The McKinney-Vento Homeless Assistance Act (McKinney-Vento) requires each LEA in a State to designate an appropriate staff person, who may also be a coordinator for other Federal programs, as a liaison for homeless children. MVHAA Sec. 722(g)(1)(J)(ii). Title I, Part A homeless set-aside funds may be used to fund all or part of the homeless liaison's salary, even if that person has no Title I duties. ESEA Sec. 1113(c)(3)(C)(ii)(II). In larger districts with significant numbers of identified homeless students enrolled, an LEA may also use Title I funds to support, as necessary, additional staff carrying out the required duties of the local liaison.

Transportation of Homeless Children and Youth, Title I, Part A

A homeless child or youth who becomes permanently housed during a school year continues to remain eligible for Title I, Part A services for the remainder of that school year. This helps ensure educational stability.

Documentation of Free Meal Eligibility for Homeless Children

To expedite the delivery of nutritional benefits, school officials may accept documentation from the local educational liaison or directors of homeless shelters where the children reside that the children are homeless. Documentation to substantiate free meal eligibility must include the child's name or a list of names, effective date(s), and the signature of the local educational liaison or the homeless shelter director. This documentation is acceptable instead of a free and reduced-price meal application. To implement these expedited procedures, school officials must work closely with the Homeless liaison to ensure children receive free meal benefits as promptly as possible.

Homeless Children Residing with Another Household

A child or family may temporarily reside with another household and still be considered homeless under the definition of the McKinney-Vento Homeless Assistance Act. In these cases, the host family's household size and income are not considered when determining the free meal eligibility for the child(ren) designated as homeless by the local educational agency liaison.

Additionally, when a host family applies for free and reduced-price meals for their children, the host family may include the homeless family as household members if the host family provides financial support to the homeless family, such as shelter, utilities, clothing, or food. In such cases, the host family must also include any income the homeless family receives. School officials must determine the eligibility of the host family in a traditional manner. However, free meal eligibility for the homeless child is based on the documentation provided by the local education liaison, even when the child is included in the host family's free and reduced-price meal application. If the host family meets the free or reduced-price meal eligibility criteria, school officials should provide the host family with temporary approval for free or reduced-price meal benefits, as appropriate. The host family's eligibility should be reevaluated when their household size decreases, i.e., the homeless family leaves.

Definition of School of Origin

The **school of origin** (SOO) is the school that the child or youth attended when permanently housed or the school in which the child or youth was last enrolled.

School Placement Determinations for Homeless Children and Youth

- Children and youth experiencing homelessness can remain in their school of origin for the duration of homelessness and until the end of the academic year, in which they obtain permanent housing if it is in their best interest. 42 U.S.C. 11432(g)(3)(A).
- LEAs must make best interest determinations that presume that staying in the school of origin is in the best interest of the child or youth; consider specific student-centered factors; prioritize the wishes of the parent, guardian, or unaccompanied youth; and include a written explanation and right to appeal if the LEA determines that school stability is not in the best interest of the child or youth. 42 U.S.C. 11432(g)(3)(B).
- The definition of school of origin includes the designated receiving school at the next grade level (if there is a feeder school pattern) and preschools. 42 U.S.C. 11432(g)(3)(I).
- Transportation to the school of origin is required until the end of the academic year when a student obtains permanent housing. 42 U.S.C. 11432(g)(1)(J)(iii).

Steps to Ensure Immediate Enrollment by Districts

Children and youth experiencing homelessness often do not have the documents required for school enrollment. Enrolling in school immediately provides these children and youth with needed stability and is also a legal requirement. To facilitate immediate enrollment, districts should consider the following practices:

- Remove barriers for immediate enrollment.
- Train all school enrollment staff, secretaries, guidance counselors, school social workers, and principals on the legal requirements regarding immediate enrollment.
- Review all LEA regulations and policies to ensure they comply with the requirements of the McKinney-Vento Act.
- Develop forms of residence to replace typical proof of residency forms. Such forms/procedures should be carefully crafted to avoid creating further barriers or delaying enrollment.

- Develop caregiver forms, enrollment forms for unaccompanied homeless youth, and other forms to replace typical proof of guardianship. Again, such forms/procedures should be carefully crafted so as not to create further barriers or delay enrollment.
- Establish school-based immunization clinics or other opportunities for on-site immunizations; collaborate with community-based or public agencies to provide school uniforms within a LEA and neighboring districts.
- Accept school records directly from families and youth.
- Contact the previous school for records and assistance with placement decisions.
- Develop short educational assessments to place students immediately while awaiting complete academic records.
- Inform families and youth in a language they can understand or in an accessible format, as appropriate, of their right to attend either their school of origin or local school.
- Inform families and youth in a language they can understand or in an accessible format, as appropriate, of their right to transportation and immediate enrollment.
- Develop clear, understandable, and accessible forms for written explanations of decisions and the right to appeal; and
- Expediently follow up on any special education and language assistance referrals or services.

Assistance to Homeless Unaccompanied Youth to Access Educational Services

Local liaisons assist unaccompanied youth in accessing educational services through such activities as:

- Helping unaccompanied youth choose and enroll in a school after considering the youth's wishes.
- Providing unaccompanied youth with notice of their appeal rights in a language they can understand or in an accessible format.
- Informing youth of their right to transportation to and from the school of origin and assisting unaccompanied youth in accessing transportation; and
- Ensuring that unaccompanied youth are immediately enrolled in school pending the resolution of disputes.

Assistance by an LEA Liaison of Homeless Families in Enrolling Their Children in a Preschool Program with a Waiting List

Liaisons must ensure homeless families and children can access Head Start, Early Head Start, LEA-administered preschool programs, and early intervention services under IDEA Part C, if eligible. 42 U.S.C. 11432(g)(3)(C).

The LEA liaison should collaborate with preschool program staff to remind them how important their early childhood services are for homeless children and to inform them of how waiting lists often create barriers for homeless families who wish to enroll their children. Some preschool programs keep slots open specifically for homeless children.

Procedures for a Dispute Concerning Placement of a Homeless Child or Youth between a School and Parent or Guardian

If a dispute arises over eligibility, school selection, or enrollment, the child or youth must be immediately enrolled in the school where the parent, guardian, or unaccompanied youth seeks enrollment, pending dispute resolution, including all available appeals. 42 U.S.C. 11432(g)(3)(E)(i).

If a dispute arises over school selection or enrollment, the LEA must immediately enroll the homeless student in the school in which enrollment is sought by the parent or guardian, pending resolution of the dispute. Similar provisions apply to the placement of unaccompanied youth. Homeless families and youth may be unaware of their right to challenge placement and enrollment decisions. Therefore, the LEA must provide the parent, guardian, or unaccompanied youth with a written Statement of the school placement decision and the appeal rights. The LEA must refer the unaccompanied youth, parent, or guardian to the district liaison, who must expeditiously conduct the dispute resolution process.

When enrollment disputes arise, it is critical that students not be kept out of school. Interruption in education can severely disrupt the student's academic progress. To avoid such disruptions, districts need an established process for resolving school placement disputes. Students should be enrolled immediately in the school of choice pending the resolution of disputes, which helps provide needed stability. District homeless liaisons help ensure that disputes are resolved objectively and expeditiously. Written notice protects both students and schools by outlining the specific reasons for the school's decision. It facilitates dispute resolution by providing decision-makers with documents to guide their determinations.

Effective Strategies for Districts to Use to Resolve Enrollment Disputes

An LEA should consider the following strategies for effectively resolving school enrollment disputes:

- Disputes should be resolved at the LEA rather than the school level.
- When inter-district issues arise, representatives from all districts involved should be present to resolve the dispute.
- A State-level appeal process involving the SCDE MV Office is available to appeal district-level decisions and resolve inter-district disputes.
- The dispute resolution process should be as informal and accessible as possible, allowing for impartial and complete review.
- Parents, guardians, and unaccompanied youth should be able to initiate the dispute resolution process directly at the school they choose and at the LEA or district homeless liaison's office.
- States should establish timelines to resolve disputes at the local and State level.
- Parents, guardians, and unaccompanied youth should be informed that they can provide written or oral documentation to support their position.
- Students should be provided with all the services they are eligible for while disputes are resolved.
- Written notice should be complete, as brief as possible, simply stated, and provided in a language the parent, guardian, or unaccompanied youth can understand. The notice should include:
 - Provide contact information for the district homeless liaison and state coordinator, briefly describing their roles.
 - A simple, detachable form that parents, guardians, or unaccompanied youth can complete and return to the school to initiate the dispute process. (The school should copy the form and return the copy to the parent, guardian, or youth for their records when it is submitted.)
 - A step-by-step procedure on how to dispute the school's decision.
 - Notice of the right to enroll immediately in the school of choice pending dispute resolution.

- Notice that “immediate enrollment” includes full participation in **all** school activities.
- Notice of the right to appeal to the State if the district-level resolution is not satisfactory and
- Timelines for resolving district- and State-level appeals.

Transportation Responsibilities for Districts and the State Department of Education

The South Carolina Department of Education and districts are responsible for reviewing and revising policies, including transportation policies that may hinder the enrollment and retention of homeless children and youth in schools. Under the McKinney-Vento Act, homeless children and youth are entitled to receive transportation and other services that are available to non-homeless students.

The South Carolina Department of Education and districts must adopt policies and practices to ensure that transportation is provided, at the request of the parent or guardian (or, in the case of an unaccompanied youth, the liaison), to or from the SOO in accordance with the following requirements:

- If the homeless child or youth continues to live in the area served by the district where the SOO is located, that district must provide or arrange for the child’s or youth’s transportation to or from the SP.
- If the homeless child or youth continues their education in the SOO but begins living in an area served by another district, the district of origin and the district in which the homeless child or youth is living must agree upon a method to apportion the responsibility and costs for providing the child with transportation to and from the school of origin. If the districts cannot agree upon a method, the responsibility and costs for transportation are to be shared equally.

District transportation responsibilities apply to all districts in the state, not just those that receive a McKinney-Vento sub-grant.

Involvement in the Development and Implementation of District Policy for Transportation of Homeless Students

School districts can best address the transportation needs of homeless and other highly mobile students through a team approach. However, based on the student’s best interest and in consultation with the parent, the district ultimately determines the mode of transportation. The district’s transportation director is a key figure in the process. This person should work with district leadership, the local liaison for homeless students,

neighboring districts, and homeless service providers to develop effective transportation policies and procedures.

Inter-district Transfers and Transportation

Districts should have inter-district (and inter-State, where appropriate) agreements that address potential transportation issues that may arise as homeless students transfer from one district to another.

Transportation of Non-homeless and Homeless Students

A district that does not provide transportation to non-homeless students is still required to transport homeless students. The statute not only requires a district to provide comparable services, including transportation services, to homeless students, but it also requires a district, at the request of a parent or guardian, to provide or arrange for transportation to and from the school of origin.

Transportation for Homeless Children Attending Preschool

To the extent a district offers a public preschool education, McKinney-Vento requires that homeless children have equal access to that preschool education as provided to non-homeless children. Furthermore, the statute requires that the services provided to homeless children be comparable to those offered to non-homeless children. Thus, if a district provides transportation for non-homeless preschool children, it must also offer comparable transportation services for homeless preschool children.

Transportation and Disputes Being Resolved

The McKinney-Vento Act's transportation requirements apply while disputes are being resolved. Therefore, at the request of the parent or guardian (or, in the case of an unaccompanied youth, the liaison), the district must provide or arrange for transportation to and from the school of origin. Inter-district transportation disputes should be resolved at the State level.

RESOURCES

[SC Department of Education McKinney-Vento Program](#)

[SchoolHouse Connection](#)

[Early Childhood Programs and McKinney Vento](#)

[National Center Homeless Education](#) (NCHE)

[National Association Education Homeless Children and Youth](#) (NAEHCY)

[MV Liaison List](#). District Homeless Liaisons

Title I and Charter Schools

Charter schools may be public schools in the district where the school is geographically located or public schools in one of the state's charter school districts. South Carolina has three Statewide charter school districts: Charter Institute at Erskine, Limestone Charter Association, SC Public Charter School District, and Voorhees University Charter Institute of Learning. Charter schools may qualify for Title I funds as any other participating public school in either district.

Information on Programs that the Charter School May be Eligible for

Upon receiving notice, the local school district or the charter school district must provide the charter school with *timely and meaningful information* about any program for which the charter school may be eligible. Districts should provide timely information about Title I eligibility to charter schools.

Obtaining Poverty Data for New or Expanding Charter Schools

Where the statutory allocation formulas rely on data from a prior year, a charter school that does not have prior year data because it is opening for the first time cannot be denied funding on that basis.

If enrollment and poverty data for a new or expanding charter school are not available at the same time that such data are collected for other public schools within the local school district or the Statewide charter school district (e.g., the charter school has not yet opened or expanded), a district may use the same data collected at a different time of the year to

determine the charter school's eligibility for, and allocation of, Title I funds. For example, a district that uses enrollment and Pupils In Poverty data collected in March 2024 to determine allocations for the 2024–25 school year may use charter school data collected later to determine the public charter school's Title I eligibility and allocation.

Allocation of Title I Funds

To receive Title I funds, a new or expanding charter school must meet the same eligibility requirements as other public schools in the local school district or the Statewide charter school district. To allocate Title I funds to schools, a district must determine which schools (including charter schools) are eligible to participate. Generally, a school is eligible to participate in the Title I program if the percentage of children from low-income families residing in the school's attendance area or enrolled in the school is at least as high as the percentage of children from low-income families in the district as a whole or is at least 35 percent.

- *Charter schools in the district must be listed on the Title I application and qualify for Title I funds as any other participating public school in the school district. See the Rank and Serve section of the Guide for the rules on ranking and serving schools with Title I funds.*
- A charter school, when it receives Title I, A funds, may implement a Title I Targeted Assistance or a Schoolwide program if it meets the 40% eligibility threshold.

Districts must follow applicable program requirements when allocating funds to public schools, including charter schools, under Title I.

Definition of Significant Expansion of Enrollment

The regulations define the term *significant expansion of enrollment* as a “substantial increase in the number of students attending a charter school due to a significant event unlikely to occur regularly, such as the addition of one or more grades or educational programs in major curriculum areas.” The requirements in the regulations do not apply to minor increases in enrollment caused by normal turnover. Rather, the regulations apply to substantial enrollment increases caused by significant or unusual events. For example, a charter school for the performing arts may offer two educational programs focusing on music and art. If the charter school were to add a third educational program in dance, and the addition of that program resulted in a substantial increase in the number of students attending the charter school, then the district serving the charter school would be required to comply with the regulations when providing funds to the charter school under a program. It is not enough for a charter school to experience a significant event, but it must

also result in a substantial increase in the number of students attending the charter school. The increase must occur in the charter school's overall enrollment without regard to student eligibility for funds under a particular program. It should also be noted that the regulations give states unfettered discretion to determine whether any expansion of enrollment in a charter school is *significant* within the meaning of the regulations. This authority does not extend to districts. Nor does it permit a State to treat a significant expansion of enrollment as insignificant to avoid its obligations under the regulations.

Allocation for New or Expanding Charter School

For a new or expanding charter school, local school districts or the Statewide charter school districts must set aside Title I funds based on projected enrollment data at the beginning of the school year and then adjust the funds when actual enrollment is known. Districts need to be flexible in working with charter schools regarding their attendance data (initial vs. actual).

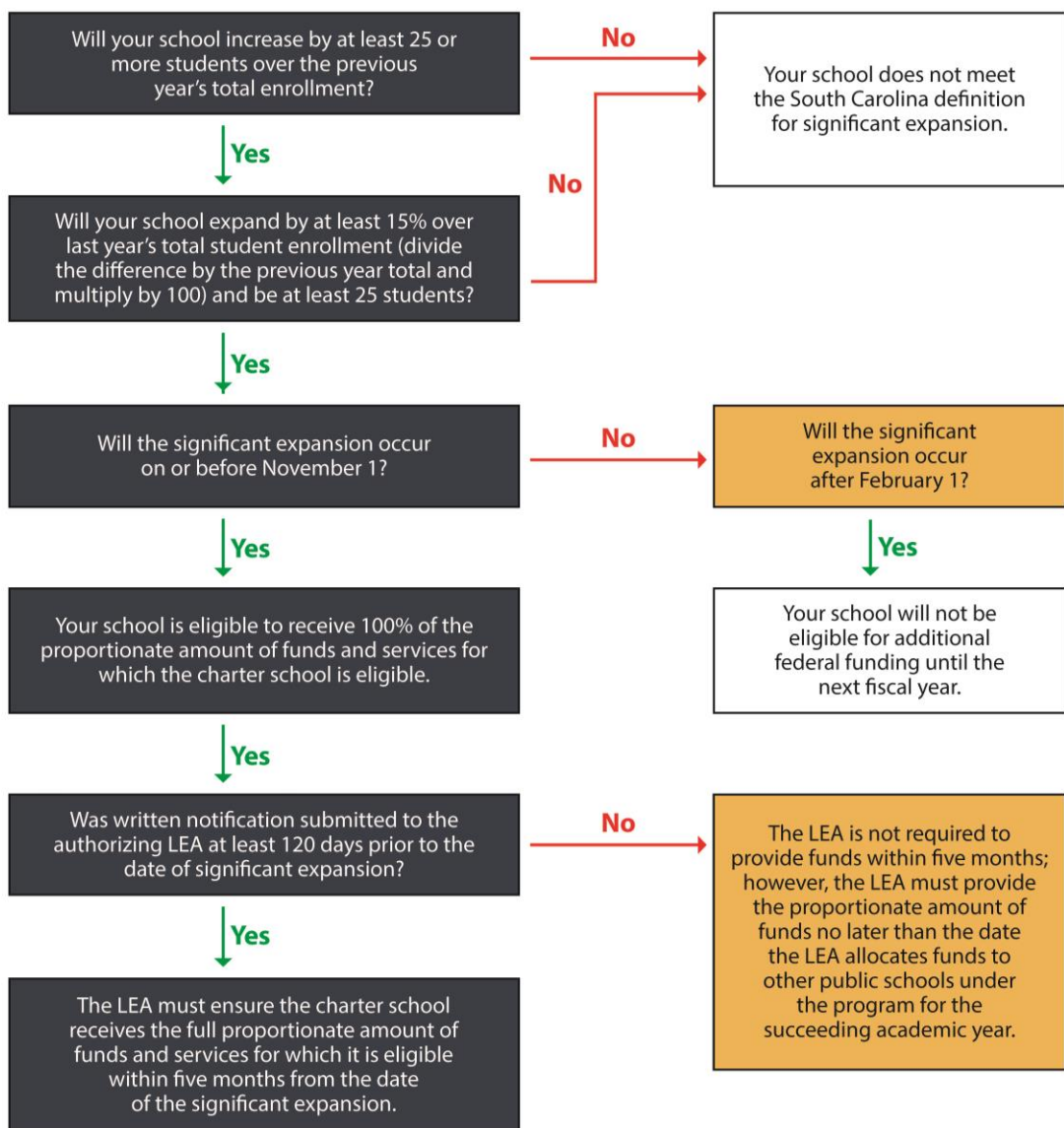
- For programs in which States and districts allocate funds by formula, a requirement that districts implement procedures that ensure that each charter school opening for the first time or significantly expanding its enrollment on or before November 1 of an academic year receives the proportionate amount of funds for which it is eligible within five months of the date the charter school opens or significantly expands its enrollment;
- For each charter school opening or significantly expanding its enrollment on or after February 1, a provision permitting, but not requiring, districts to implement procedures to provide the charter school with a *pro-rata* portion of the proportionate amount of funds for which the charter school is eligible under a covered program; and
- A general prohibition against districts relying on enrollment or eligibility data from a prior year in determining a charter school's eligibility to receive funds under a program during an academic year in which the charter school opens for the first time or significantly expands its enrollment, even if allocations to other districts or public schools are based on a prior year's data.

Adjustments in Data and Allocations

If the local school district or the Statewide charter school district provides funds to a new or expanding charter school based on projected data and, after the charter school opens or expands, actual enrollment or eligibility data show that the district has allocated more or fewer funds to the charter school than the amount for which the charter school was eligible. The district must make appropriate adjustments to the allocation previously made to the charter school. This requirement aims to ensure that new and expanding charter schools receive the amount of funds for which they are eligible -- no more and no less.

Any required adjustments to allocations for a given academic year must be based on actual enrollment or eligibility data for the charter school on or after the date it opens for the first time or significantly expands its enrollment. The adjustments may not be based on enrollment or eligibility data from a prior year, even if allocations to other districts and public schools under the program are based on the previous year's data.

Significant Expansion of South Carolina Charter Schools Flow Chart



Reallocation of Funds if a Charter School Closes

Neither the law nor the regulations prescribe closeout or reallocation procedures for States or districts to follow if and when a charter school closes. Therefore, as a general rule, if a charter school that has received funds in accordance with these regulations closes, States and districts should follow the same procedures used to close out schoolwide plans and reallocate funds for other eligible entities under the applicable program.

Responsibility of the Charter School

Charter schools have four primary responsibilities under the regulations.

- First, to receive funds in accordance with the regulations, a new or expanding charter school must notify the local school district or the Statewide charter school district, in writing, at least 120 days in advance, of the date the charter school is scheduled to open or expand (this may be in the form of a school board agenda item or other charter approval process).
 - A district that does not receive written notice of the date an eligible charter school is scheduled to open or expand (or the date the charter school opened or expanded) is not required to comply with the requirements in the regulations when providing funds to the charter school.
- Second, a charter school must establish eligibility to receive funds under the particular program and comply with all program requirements.
- Third, upon request, a charter school that has not yet opened or expanded must provide the responsible State agency or district with any data or information available to the charter school that the district may reasonably need to estimate the amount of funds the charter school will be eligible to receive when it opens or expands.
- Fourth, once a charter school opens or expands, it must provide the district with actual enrollment and eligibility data. States have broad discretion in establishing procedures for charter schools to meet these requirements.

Failure by the Charter School to Comply with Requested Information

A charter school that has not yet opened or expanded must provide the district with any available data or information that the district *reasonably* requests to assist it in estimating the charter school's projected enrollment. The district might request, for example, pre-

registration lists or enrollment data from the prior academic year. While the charter school is not required to create any new data, once it opens or expands, it is necessary to provide the district with actual enrollment and eligibility data. Under the regulations, the district may elect not to provide any funds to a new or expanding charter school until the charter school has provided the district with actual enrollment and eligibility data. Before withholding funds, the district should notify the Director of the OFSA.

Major Responsibilities of States and Districts

The State agency, the local school district, and the Statewide charter school districts have two primary responsibilities under the regulations.

- First, upon receiving written notice of the date a charter school is scheduled to open for the first time or significantly expand its enrollment, the district responsible for administering the program must provide the charter school with *timely and meaningful information* about each program in which the charter school may be eligible to participate.
- Second, States and districts are required to implement procedures that ensure the following:
 - a. That each charter school opening or expanding on or before November 1st of an academic year receives the proportionate amount of funds for which it is eligible within five months; and
 - b. That each charter school opening or expanding between November 1 and February 1 of an academic year receives at least a *pro-rata* portion of the proportionate amount of funds for which it is eligible. The district must provide funds to these charter schools no later than the date the State or district allocates funds to other districts and public schools under the program for the succeeding academic year.

Although districts may choose to implement procedures to provide a *pro-rata* portion of funds to eligible charter schools that open or expand after February 1 of an academic year, the regulations do not require them to do so. Districts that choose to provide funds to such charter schools may establish their time frames for making the allocations, except that allocations must be made from applicable program funds allocated to the State or district for the academic year in which the charter school opens or expands or for the succeeding academic year.

The Charter School Authorizer

The “charter school authorizer” in South Carolina is considered to be the local school district or one of the state-wide charter school districts in which the charter application was approved by the district school board.

Qualifications for Paraprofessionals in Charter Schools

Instructional paraprofessionals hired to work in programs supported with Title I, Part A funds must:

- Have a high school diploma or its recognized equivalent.
- Have at least two years of study at an institution of higher education, possess at least an associate’s degree, or demonstrate subject-matter competence through a formal State or local assessment.

The paraprofessional qualifications requirements apply immediately to all paraprofessionals hired to work in Title I programs.

These provisions of the law apply to charter schools in the same manner that they apply to traditional public schools.

Comparability

Charter schools must be included in the local school district’s comparability report.

RESOURCES

USING PROPORTIONALITY FOR ONE CHARTER SCHOOL WITH STUDENTS FROM MULTIPLE SCHOOLS IN THE DISTRICT (Example)

Determination of Poverty Percentage for Charter Schools Using Proportionality

LEA Fiscal Requirements

The LEA must meet three fiscal requirements related to the expenditure of regular State and local funds. An LEA must:

- 1) Provide services in project areas with State and local funds that are at least comparable to services provided in areas not receiving Part A services.
- 2) Maintain maintenance of effort; and,
- 3) Use Part A funds to supplement, not supplant, regular non-Federal funds.

Each of these requirements is discussed below.

Comparability

Comparability is a **test of fairness**. Under Section 1118(c) of the ESEA, LEAs may only receive Part A funds if the LEA uses State and local funds to provide services in Title I schools, which, *when taken as a whole*, are at least comparable to the non-Title I schools. In other words, LEAs must certify each year that Title I schools receive non-Federal funding that is, on average, at least equal to that of non-Title I schools. If all schools within an LEA are Title I, then they must be treated comparably to one another. This section discusses how LEAs ensure compliance with the comparability requirement and methods for calculating compliance using the student/instructional staff ratios.

According to Section 1118(c) of the Elementary and Secondary Education Act (ESEA), Local Educational Agencies (LEAs) are eligible to receive Part A funds only if they allocate state and local resources to Title I schools in a manner that ensures, in aggregate, comparability to non-Title I schools. In essence, LEAs must annually certify that non-federal funding for Title I schools is, on average, at least equivalent to that provided to non-Title I schools. Additionally, if all schools within an LEA are designated as Title I, they must be funded equitably in relation to one another. This section outlines the methods LEAs use to verify compliance with the comparability requirement, including calculations based on student-to-instructional staff ratios.

Exemptions from Comparability

The requirement to prove comparability does not apply to districts with only **one school building per grade span**. ESEA Sec. 1118(c)(4). Also, comparability is not required if a school district has only two schools, one large and one small. Charter schools should be treated like any other school and included in comparability testing. Finally, a school

district **may** exclude schools (including charter schools) with **100** or fewer students from its comparability test.

Timeframe

Comparability must be tested **every fiscal year** a district receives Title I funds.

Comparability testing should be completed at the district level and uploaded into GEMS by **November 15**. This will give a district time to fix comparability issues before the second half of the school year. A district should have corrected any comparability issues no later than **January 15**. Permissible methods for comparability corrections are listed below.

Criteria for Meeting Comparability

Federal guidance allows for multiple methods to demonstrate comparability, a requirement ensuring that Title I schools receive services equivalent to those in non-Title I schools before any federal funds are added.

In South Carolina, the SCDE has selected the student-to-teacher ratio as the standard method for all districts to use when demonstrating comparability.

To meet this requirement, each district must establish and implement one of the following federally approved methods (as permitted by guidance). However, SCDE mandates the use of the student/teacher ratio.

If the LEA fails to meet comparability using the student-to-teacher ratio, one of the following methods can be used:

- Student/instructional staff salary ratios
- Expenditure per pupil; or
- A resource allocation plan based on student characteristics such as poverty, limited English proficiency, or disability.

LEAs usually meet comparability through the following:

- a district-wide salary schedule.
- a district policy to ensure equivalence among schools in teachers, administrators, and other staff; or
- a district policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies. ESEA Section 1118(c)(2)(A)(i)-(iii).

Student/Instructional Staff Ratio Test Procedures

- Students and instructional staff **must** be counted **on the same day**.
- Title I schools are compared to non-Title I schools. In a district with only Title I schools, the two least poor are compared to the poorer Title I schools.

EXAMPLE 6

(All elementary schools in the LEA are Title I schools and each high-poverty school is compared to a limited comparison group consisting of low-poverty schools)

In this example, the LEA bases its comparability determinations on student/instructional staff ratios. All elementary schools in the LEA are Title I schools and the LEA compares its 12 highest-poverty schools to the two schools with the lowest poverty rates. The schools would be considered substantially comparable if the student/instructional staff ratio in each of the LEA's 12 highest-poverty schools does not exceed 110 percent of the student/instructional staff ratio for the low-poverty comparison group.

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Free/Reduced Lunch Children	Percent Poor	Comparable?
High Poverty Title I Schools *							
Sheppard	PK - 5	373	26.5	14.1	356	95%	Yes
Hunter	PK - 5	362	26.4	13.7	326	90%	Yes
Ludlow	KG - 5	313	24.6	12.7	265	85%	Yes
Washington	PK - 5	319	25.0	12.8	261	82%	Yes
Mifflin	PK - 5	254	24.6	10.3	202	80%	Yes
Kinsey	PK - 5	371	24.4	15.2	293	79%	Yes
Dunbar	PK - 5	234	21.2	11.0	167	71%	Yes
Sharswood	KG - 5	360	26.4	13.6	255	71%	Yes
Jackson	KG - 5	330	27.0	12.2	232	70%	Yes
McCloskey	KG - 5	346	25.0	13.8	209	60%	Yes
Lingelbach	KG - 5	328	26.4	12.4	204	62%	Yes
Dobson	KG - 6	266	21.4	12.4	160	60%	Yes

Low Poverty Title I Schools							
Crossan	KG - 5	310	23.6	13.1	148	48%	
Penn Alexander	KG - 6	376	25.7	14.6	171	45%	
Total		686	49.3	13.9			
110% of Student/Instructional Staff Ratio *				15.3			

* The services to schools in the LEA would be considered substantially comparable if the student/instructional staff ratio in each high-poverty school does not exceed 15.3 (13.9 x 1.1).

- Schools are compared by grade span (usually elementary, middle, and high schools).
- Only those grade spans with Title I-served schools must be compared.
- Students are counted at each school using the district Average Daily Membership (ADM). **Do not count** three and four-year-olds.

- f. Instructional staff can be counted in several ways. Most districts use payroll or finance data. Staff are counted as full (1.0) or fractional (less than 1.0) Full-Time Equivalents (FTE).

Include and **exclude** the following staff in the count:

Include:	Exclude:
Classroom teachers, music, art, PE teachers, and foreign language instructors	Custodians or housekeepers
Computer lab instructors (not monitors)	Food service personnel
Instructional coaches	Secretaries (all)
Curriculum coordinators	SASI clerk (PowerSchool clerk)
Principals	Attendance clerk
Assistant principals	Data entry clerk
Instructional paraprofessionals - must work under the supervision of a highly qualified teacher (count instructional paraprofessionals at 50% of their allowable FTE)	Nurses
Media Specialist	Social workers
Guidance or career counselor	Psychologist
Speech therapist	Any Federally paid personnel (See information below in reference to State Fiscal Stabilization Funds.)
	Pre-K teachers or paraprofessionals
	Staff salary differentials for years of employment

Source: [Non-Regulatory Guidance: Title I Fiscal Issues](#)

- g. Staff data should include the following (Please note that Social Security numbers and salary are **unnecessary**):
- Name of included personnel
 - Name of school where employed
 - FTE (fractional if the person is paid part-time out of an excluded account and part-time out of an included account, or is a part-time employee)
 - Funding source
 - Position description
 - Date on which the report counted the personnel

- h. Personnel who are excluded (crossed out or otherwise highlighted for verification)
The source data used for student count (ADM) and instructional staff count must be verifiable.
- i. A K-8 school (or similar large grade span school) may be counted as one K-5 and one 6-8 school.
- j. A K-2, 3-5, or similar small grade span could be excluded from comparability if there is only one such school in the district.

Comparability testing should be completed at the district level by **November 15**. This will give a district time to fix comparability issues before the second half of the school year. A district should have corrected any comparability issues no later than **January 15**.

Correction of Noncompliance

If an LEA cannot meet comparability, it must make adjustments so that it is comparable for that school year.

For example, if the LEA cannot meet comparability using student/instructional staff ratios, it may use these strategies to attain compliance:

- a. Adjust the funding source(s) used to pay the instructional staff,
- b. Move instructional staff from one school to another for all or part of the day,
- c. Use a different method to test for comparability (**contact the SCDE for assistance**), or if the LEA fails to correct its noncompliance, it could be deemed to be ineligible for Title I-A funding.

RESOURCE:

[Comparability of Services - South Carolina Department of Education](#)

Comparability Computation Form Sample

The form located at the following link may be used to compute comparability. If a district does not use this form and uses its own form or spreadsheet, it should include the same information and calculations.

The example below assumes a district serves only elementary grades and has Title I and non-Title I schools. A form for each grade span is required if a district serves other or all grade spans.

If a district has **only** Title I schools in its grade spans, then the two (2) least poor Title I schools are used as the comparison schools. In effect, they act as non-Title I schools for this purpose.

School	Grade Span	Student Enrollment	FTE Instructional Staff	Student/ Instructional Staff Ratio	Comparable ?
Title I Elementary Schools					
Beaufort Elem	KG - 5	528	70.2	7.5	Yes
Broad River Elem	KG - 5	510	49.4	10.3	Yes
Davis Elem	KG - 5	417	38.7	10.8	Yes
Shanklin Elem	KG - 5	726	59	12.3	Yes
Port Royal Elem	KG - 5	189	16	11.8	Yes
St. Helena Elem	KG - 5	808	55	14.6	No
Shell Point Elem	KG - 5	673	60	11.2	Yes
Non-Title I Elementary Schools					
Hilton Head Elem	KG - 5	1,764	114.5	15.4	
Lady's Island Elem	KG - 5	757	70.0	10.8	
MC Riley Elem	KG - 5	1,005	88.0	11.4	
Mossy Oaks Elem	KG - 5	484	42.0	11.5	
Total		4,010	314.5	12.8	
110% of Student/FTE ratio for non-Title I schools *				14.08	

The ratio of 14.08 is the **target ratio**. To be comparable, each Title I elementary school's student/instructional staff ratio may not exceed 14.08 (i.e., 14.08 students per teacher).

Maintenance of Effort

An LEA may receive its full allocation of Title I, Part A funds for any fiscal year only if the State educational agency (SEA) determines that the LEA has maintained its fiscal effort in accordance with Section 8521 of the ESEA.

Section 8521 of the ESEA provides that an LEA may receive funds under Title I, Part A for any fiscal year only if the SEA finds that either the combined fiscal effort per student or the aggregate expenditures of the LEA and the State with respect to the provision of free public education by the LEA for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year.

Maintenance of effort (MOE) is a fiscal calculation comparing two consecutive years (preceding and second preceding fiscal year) to demonstrate that school district expenditures from State and local funds meet or exceed the required amount necessary for Title I funding.

Source Documentation

As documentation of the district's maintenance of fiscal effort, a worksheet must be completed for each of the two years in the comparison. The school district's annual Audit report, normally housed in the school district's business office, is the source data. The sum of the calculated MOE for each of the two comparison years (the preceding year compared to the second preceding year) must be noted on page one of the school district's application for Title I funds. **There is also a requirement that a report be generated from the district's accounting software that will summarize capital outlay expenditures for the two fiscal years. This report and the district's MOE worksheet will be used as supporting documentation.**

RESOURCES

[Training materials](#)

[MOE web-based forms](#) (Downloadable file)

[General guidance](#)

Example

Districts will meet MOE for 2024 if the 2022-23 State/local effort equals at least 90 percent of the 2021-22 State/local effort.

The LEA must maintain fiscal effort in the same manner as it does for Title I, Part A, to receive Title I.

Failure to Meet the MOE Requirement

If an LEA fails to meet the MOE requirement, the SEA must reduce the amount of funds allocated in the exact proportion by which the LEA fails to maintain on either a per student basis or aggregate basis, whichever method is the most favorable to the LEA.

For example, an LEA would not meet MOE for 2024 if the 2022-23 State/local effort equals 89% of the 2021-22 State/local effort. In that case, the LEA's Title I, Part A funds would be reduced in 2024 by 1%.

Five-Year Exclusion

Section 8019 of the ESEA exempts an LEA from any reduction in its allotment unless they have previously failed its MOE at least once in the previous five years.

Waiver

The Secretary of USED may waive the MOE requirement in the case of:

- Exceptional or uncontrollable circumstances such as a natural disaster, or
- A change in the organizational structure of the LEA, or
- A precipitous decline in the financial resources of the LEA.

A waiver of MOE is for one fiscal year. A waived MOE constitutes maintenance for the five-year exclusion rule listed above.

Expenditures to be included in the MOE Calculation

The SEA considers only the LEA's State and local fund expenditures for free public education, including those for administration, instruction, attendance, health services, pupil transportation services, operation and maintenance of facilities, fixed charges, and

net expenditures to cover deficits for food service and student body activities. 34 C.F.R. 299.5(d).

Expenditures to be excluded from the MOE Calculation

Expenditures for community services, capital outlay, debt service, or supplemental expenses made due to a Presidentially declared disaster are not to be included in the determination. Any expenditures made from funds provided by the Federal government are to be excluded. 34 C.F.R. 299.5(d).

Preceding and second preceding fiscal years

Section 9521 of the ESEA requires that MOE be measured by comparing the preceding year's fiscal effort to the second preceding fiscal year. In South Carolina, the fiscal year begins on July 1. For a practical example, if Federal funds are first made available on July 1, 2025, the "fiscal year" for MOE calculations for FY2026 would run from July 1, 2024, to June 30, 2025. The second preceding fiscal year would run from July 1, 2023, to June 30, 2024.

RESOURCE:

[ED MOE Guidance](#)

Requirements for Maintenance of Effort (MOE) Calculation

Directions for Electronic Worksheet Calculation of Maintenance of Effort (MOE)

The MOE [Excel worksheet](#) is provided electronically for the convenience of calculating the MOE. Determine the preceding and second preceding years. Read USED Non-Regulatory Guidance, Title I Fiscal Issues (2008) for more information. A worksheet must be done for each, using source data from the LEA Audit Report and the 135 Average Daily Membership (ADM) for each year. Enter the amounts of Audit Report data for **Steps 1, 2, and 3** into the appropriate cell on the Excel worksheet. Steps 1, 2, and 3 will be calculated automatically. **Step 4** requires data to be transferred from a prior worksheet to the cell in Step 4 for electronic determination of effort. **A paper copy of source data and worksheets must be maintained by the LEA for Title I monitoring purposes.** Instructions are as follows for entering information in the electronic worksheet:

Step 1:

Input the audit report **Total** LEA expenditures per the audited Location Reconciliation Schedule. This **Total** includes total expenditures as stated on the Statement of Revenues, Expenditures, and Changes in Fund Balances: Governmental Funds, **plus** the total expenditures from the Food Service Fund (See Schedule) and the Pupil Activity Fund (See Schedule).

Step 2:

List the page number beside each data source or attach a copy of the dated report from accounting software using appropriate Function and Object numbers. Input amounts for the following items, which are **excluded** from the **Total** in **Step 1**:

- Federal Expenditures – Use the total from the Schedule of Expenditure of Federal Awards (SEFA).
- Capital Outlay – A report from accounting software must reflect appropriate Functions and Objects. Retain a copy of the MOE file.
- Debt Service – Use appropriate Statements or Schedule data.
- Community Service – Activities that are not directly related to the provision of education for students. These include services such as community recreation programs, civic activities, public libraries, programs of custody and care of children, and community welfare activities provided by the school district for the community.
- Pupil Activity Fund – Use Schedule, Functions 272, 273 only.
- Intergovernmental – Use total from Statement of Revenues, Expenditures, and Changes in Fund Balances: Governmental Funds.

Step 3:

Input the 135 ADM data for this Audit Year from the district's official report to the Department of Education. The per-pupil MOE will be calculated electronically.

Step 4:

Input the per-pupil MOE calculated for the year, which is now considered the second preceding year relative to the previous year just calculated. The MOE determination is now completed automatically using a formula statement.

Calculating MOE for FY2024

<i>Title I Fiscal Requirements</i>		
Electronic Worksheet to Calculate Maintenance of Effort (MOE)		
Composite Sample for the Second Preceding Year		
<u>Step 1:</u>		
<u>Preceding Year Audit Report Total Expenditures:</u>		
(Refer to the audited Location Reconciliation Schedule)		\$ 15,200,000
<u>Step 2:</u>		
Items Subtracted from Total Expenditures in Step 1:		
<u>(List the page number for each data source from the Audit Report.)</u>		
Federal Expenditures (SEFA)	<u>Page 70</u>	\$595,000.00
Capital Outlay (Attach Report)		170,000.00
Debt Service	<u>Page 15</u>	73,500.00
Community Services	<u>Page 15</u>	1,600.00
Pupil Activity Fund	<u>Page 61</u>	45,000.00
Intergovernmental	<u>Page 15</u>	9,800.00
Total Amount Excluded:		\$ (894,900.00)
Total Expenditures for MOE Calculation:		\$ 14,305,100.00
<u>Step 3:</u>		

135 ADM:	2,105
The per-pupil MOE is calculated for the <u>preceding</u> year.	
From Audit Year <u>2023</u>:	\$ 6,795.77
<u>Step 4:</u>	
The per-pupil MOE is calculated for the <u>second preceding</u> year.	
from Audit Year <u>2022</u>: (Attach Worksheet)	\$ 6,576.98
Met MOE Requirements? *	Met MOE
*Compare the per-pupil MOE in step 3 to the per-pupil MOE of step 4. The per-pupil amount in step 3 must not be less than ninety percent of the per-pupil amount in step 4 to meet the MOE requirement. The MOE would not have been met if the per-pupil MOE were less than \$5,919.28.	

Supplement, Not Supplant

LEAs may use Title I funds only to supplement or increase the funds that would, in the absence of Title I funds, be made available from non-Federal sources to educate students participating in Title I programs.

This requirement is known as “Supplement, not supplant” (SNS). SNS requires LEAs to use a Title I neutral methodology when allocating their State and local funds to schools. To do this, LEAs must ensure that every Title I school receives all the State and local funds it would otherwise receive if it were not receiving Title I funds. In other words, the LEA may not account for Title I funding in its State and local fund distribution methodology. See the SNS Guidance below for examples of acceptable methods.

LEAs must submit their Title I neutral methodology to the SEA to demonstrate that all schools have received their fair share of State and local funding. An LEA need not submit a methodology if it:

1. Has only one school.
2. Has only Title I schools; or,
3. Only Title I or Non-Title I schools are within a single grade span, provided the methodology for other grade spans is still reported as required.

SNS Evaluations

When reviewing compliance with SNS, LEAs are not required to show that specific costs or services are supplemental. Nor may LEAs' evaluations account for the particular instructional setting or method when demonstrating SNS compliance. ESEA Sec. 1118(b)(3). Instead, LEAs must only show that the allocation of State and local funds does not account for Title I funding.

There are two exceptions to the general rule that State and local funds should not be taken into account. First, an LEA may provide *more* funding to Title I schools because of their Title I status. However, this additional funding should only be provided after applying a Title I neutral SNS methodology. Second, an LEA may exclude Title I-like State or local funding from its neutral methodology calculations. Similar to the first exception, this exclusion also envisions the neutral methodology to be applied *before* allocating supplemental funding.

LEAs may demonstrate SNS through several methodologies. ESEA Sec. 1118(b)(2). One permissible methodology is to measure the allocation of funding per student. For example, an LEA could set State and local funding allocations based on student characteristics, such as being low-income, having a disability, and so forth. Each characteristic would result in a set amount of funding per student without regard for whether the school received funding. LEAs may design their own methodologies so long as they adequately demonstrate that Title I funds were supplemental. For detailed examples, refer to pages 12-13 of the SNS Guidance below.

RESOURCE

[ED/SCDE SNS Guidance](#)

Example:

Richland School District Two

ESSA Title I Part A Supplement, Not Supplant Methodology

The Every Student Succeeds Act (ESSA) requires Local Education Agencies (LEAs) to demonstrate that their methodology complies with Section 1118 of ESSA describing a neutral methodology of distributing state and local funds to schools in the District.

The district gives a discretionary budget to each school or stand-alone center. Below are the allocation formulas.

Discretionary Per Pupil Allocation (PPA)

Elementary Schools

PPA

PY 135 ADM	\$85
PY 135 Pupils in Poverty	\$35
PY 135 ADM	\$17 (Supply Allocation)
PY 135 ADM	\$1 (Health Room Allocation)

Middle Schools

PPA

PY 135 ADM	\$90
PY 135 Pupils in Poverty	\$35
PY 135 ADM	\$17 (Supply Allocation)
PY 135 ADM	\$1 (Health Room Allocation)

High Schools

PPA

PY 135 ADM	\$105
PY 135 Pupils in Poverty	\$35
PY 135 ADM	\$17 (Supply Allocation)
PY 135 ADM	\$1 (Health Room Allocation)
PY 135 CTE ADM	\$51
Flat Amount	\$2,930 (Advanced Placement)

Richland School District Two

ESSA Title I Part A Supplement, Not Supplant Methodology

General fund allocations are also made specifically to address the needs of students at risk of school failure. Funding is allocated as follows:

<u>At Risk Per Pupil Allocation</u>		
Elementary Schools		
PY 135 Pupils in Poverty	\$165	
Middle Schools		
PY 135 Pupils in Poverty	\$125	
High Schools		
PY 135 Pupils in Poverty	\$90	

The following page summarizes the staffing standards for Richland School District Two. In addition to the staffing standards, principals may use other funding sources for positions using Title I allocations or funding from other federal grants.

Richland School District Two

ESSA Title I Part A Supplement, Not Supplant Methodology

Staffing Standards

Richland School District Two								
School Staffing Standards								
Elementary			Middle			High		
Position	Membership	FTE/Ratio	Position	Membership	FTE/Ratio	Position	Membership	FTE/Ratio
Principal	Any	1.0	Principal	Any	1.0	Principal	Any	1.0
Assistant Principal	≥ 350	1.0	Assistant Principal	≥ 500	2.0	Assistant Principal	< 750	2.0
	≥ 600	2.0		≥ 800	2.0		≥ 1000	3.0
Media Specialist	< 250	0.5	Media Specialist	< 250	0.5		≥ 2000	4.0
	≥ 250	1.0		≥ 250	1.0	Assistant Administrator	< 750	2.0
Guidance Counselor	> 350	0.5	Guidance Counselor &		300:1		≥ 1000	3.0
	≥ 350	1.0	Career Specialists				≥ 1400	4.0
	≥ 750	1.5					≥ 1700	5.0
	≥ 1000	2.0					≥ 2100	6.0
	≥ 1250	2.5				Media Specialist	≥ 400	1.0
							≥ 1000	2.0
						Guidance Counselor &		300:1
						Career Specialists		Min 1 per GL
Teachers			Teachers			Teachers		
GR 1-5		22:1	GR 6 ELA/Math		20:1	Academic Classes		20:1
GR 1-3 Reading/Math		22:1	GR 6 Other Subjects		20:1	Music & PE		40:1
GR 1-3 Other Subjects		22:1	GR 7-8		20:1	Health		35:1
GR 4-5 Lang Arts/Math		22:1	PE & Music		35:1	Athletic Director	Any	1.0
GR 4-5 Other Subjects		22:1	Health		40:1	Magnet		
Pre Kindergarten		20:1	Technology Specialist	< 500	0.5	Schoolwide		1.0
Kindergarten		22:1		≥ 500	1.0	School within a school		2.0
Art	> 350	0.5	Academic Effectiveness	Any	0.5	ROTC		2.0
	≥ 350	1.0	AVID	Any	0.5	Technology Specialist	Any	1.0
	> 750	1.5	Magnet					
	≥ 1000	2.0	Schoolwide		1.0	Career Prep		3.0
	≥ 1250	2.5	School within a school		2.0	Extra Curricular Tutorial		0.25
						Arts Magnet PCA		2
Music		Max class size 40				HS Initiatives		
Physical Education		Max class size 28	Orchestra	< 500	0.5	Orchestra	< 500	0.5
Technology Specialist	< 350	0.5		≥ 500	1.0		≥ 500	1.0
	≥ 350	1.0	Band	Any	1.0	Band	Any	1.0
Nurse	< 350	0.5	Nurse	Any	1	Nurse	Any	1
	≥ 350	1.0	Psychologist	< 500	0.5	Psychologist	< 500	0.5
Psychologist	Any	0.5		≥ 500	1.0		≥ 500	1.0
Classified Staff			Classified Staff			Classified Staff		
Administrative Assistant	Any	1.0	Administrative Assistant	Any	1.0	Administrative Assistant	Any	1.0
Student Data Coordinator	Any	1.0	Student Data Coordinator	Any	1.0	Student Data Coordinator	Any	1.0
Attendance Secretary	Any	1.0	Secretary II (185 day)	> 750	1.0	Secretary II (215 day)	Any	3.0
Secretary II	> 750	1.0		> 1000	2.0	Secretary II (185 day)	> 1650	2.0
Health Room Aide	Any	1.0	Secretary II Guidance (240 day)	Any	1.0	Secretary II Guidance (240 day)	Any	1.0
Media Aide	Any	1.0	Bookkeeper	Any	1.0	Bookkeeper	Any	1.0
GR 1-5 Instruc. Aides	< 600	2.0	Media Aide	Any	1.0	Media Aide	Any	1.0
	600-749	3.0	Health Room Aide	Any	1.0	Health Room Aide	Any	1.0
	750-899	4.0	Instructional Aides	< 850	2.0	Clerical - Fees	Any	1.0
	900-1050	5.0		850-1099	3.0	Instructional Aides	< 1400	4.0
	> 1050	6.0		1100-1349	4.0		1400-1699	5.0
Kindergarten Aides	Any	1 per classroom		1350-1600	5.0		1700-1799	6.0
							1800-2000	7.0
						Maintenance Worker	Any	1.0

Administrative Costs

An LEA may reserve a reasonable amount necessary to administer Title I programs for public school children. This reservation for administration is taken “off the top” of the LEA’s allocation and not from the funds allocated for Title I services for private school children. Funds for instructional services are allocated after administrative and other “off-the-top” costs are determined.

Administrative funds to administer the equitable services program to private school students must come out of the equitable services set-aside and are not to be paid from the administrative set-aside for public school programs.

Title I, Part A – Determining Allocations

Title I, Part A grants are formula-based (entitlement) funds for LEAs. The amount received by LEAs is determined using formulas provided under Section 1124 of the ESEA. OFSA receives preliminary and final allocations from ED. Preliminary allocations are typically sent to OFSA in the spring, and OFSA releases them to LEAs by May. Final allocations are typically sent to OFSA in early summer and released to LEAs by October. Use these preliminary numbers for planning purposes only. Final allocations can increase or decrease depending on multiple ED allocation calculations factors. For more information, see [Understanding Your Title I, Part A Allocation-Webinar](#). LEAs will apply within the GEMS application system and process claims for Title I through the GAPS system for each grant cycle.

How Title I, Part A Funds Are Calculated

ED’s formulas are recorded in 34 C.F.R. 200.71 and are contained in the table below. The allocations are based on U.S. Census Bureau estimates of income and poverty for all U.S. States and counties, which the SEA further modifies according to more recent available data. Title I, Part A allocations are then calculated using the SEA-provided information for four different funding streams.

In making these calculations, the SEA must determine the number of “formula children” within each LEA. The number of formula children, referred to as the formula count, and the percentage of formula children within the LEA are then used to determine which allocation an LEA is entitled to receive. The formula count includes children between the ages of 5 and 17.

LEAs with a formula count of at least 10 and a count percentage exceeding 2% of the LEA's school population receive Basic Grant funds. LEAs with a formula count exceeding 6,500 or 15% of the total school-age population receive Concentration Grant funds. LEAs with a formula count of at least 10 and a count percentage of at least 5% of the LEA's school population receive Targeted Grant funds. LEAs with a formula count of at least 10 and a count percentage of at least 10% of the LEA's school population receive Education Finance Incentive Grant (EFIG) funds. LEAs may receive funds through one or more of the four grant categories.

PRELIMINARY ALLOCATIONS

Use preliminary numbers for planning purposes only. Final allocations can increase or decrease depending on multiple factors affecting ED allocation calculations.

	FORMULA COUNT (AGED 5-17 POPULATION)	AND/OR	POVERTY% % OF FORMULA COUNT
BASIC	Greater than or equal to 10	AND	Greater than 2%
CONCENTRATED	Greater than 6500	OR	Greater than 15%
TARGETED	Greater than or equal to 10	AND	Greater than or equal to 5%
EFIG	Greater than or equal to 10	AND	Greater than or equal to 5%

The table above clarifies that poverty data impact Title I, Part A Allocations. As a safety mechanism to mitigate funding loss for LEAs where eligibility changes, ED requires that OFSA apply a hold-harmless requirement. The hold-harmless requirement prevents between-year decreases beyond the amounts specified in sections 1122(c) and 1125(f)(3) of the ESEA, and 34 C.F.R. 200.73(a) of ED's regulations.

RESOURCES:

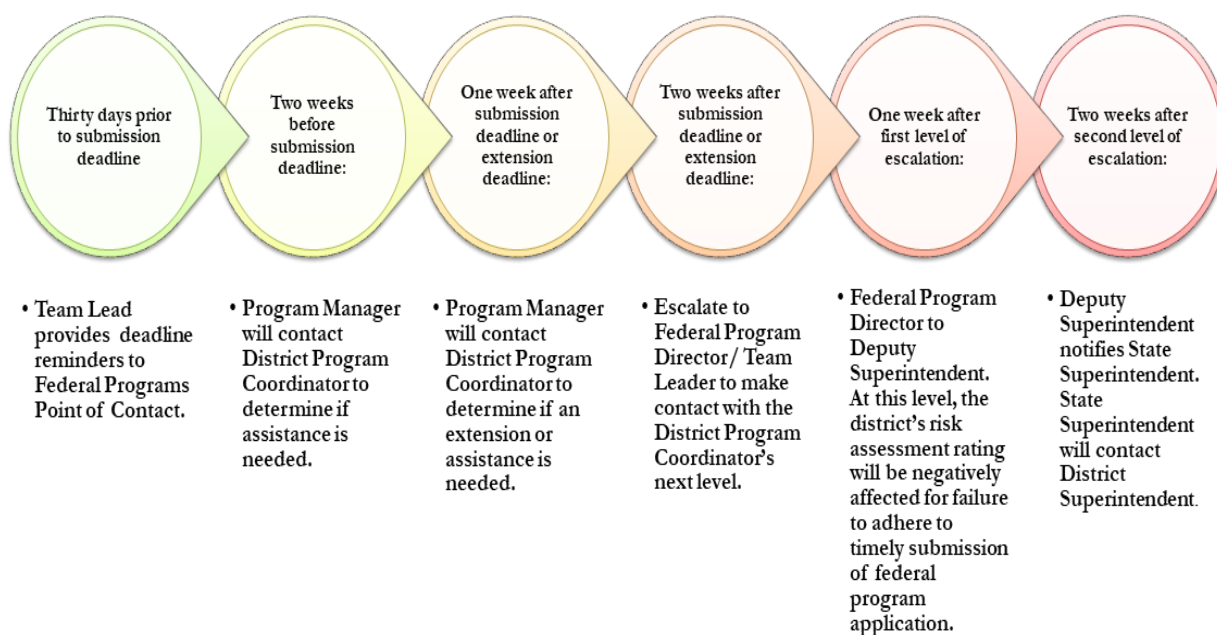
[Small Area Income and Poverty Estimates \(SAIPE\) Program](#)

State Educational Agency Procedures for Adjusting Basic, Concentration, Targeted, and Education Finance Incentive Grant Allocations Determined by the Department of Education

Title I, Part A Implementation Calendar

The LEA should refer to the [OFSA Federal Programs Timeline](#) to ensure it meets all required and recommended program deadlines.

Escalation Plan for Application Submission



Grant Application Process

The LEA's Title I application will be submitted online at [GEMS Sign-In \(egrantsmanagement.com\)](#) by logging in and accessing the Title I online application. For questions concerning the Title I online application, contact your SCDE Title I project manager or use the [GEMS Manual](#).

Accounting and Reporting Procedures

Fiscal Control and Accounting Requirements

The Federal government requires States to set fiscal control and accounting procedures for their funds and those of their sub-grant recipients in accordance with Federal and State laws and policies.

These fiscal control and accounting procedures must:

- Permit preparation of required reports for State and Federal officials; and
- Permit funds are to be traced to a level of expenditures adequate to establish that the funds have been used according to the Federal statutes, regulations, and the terms and conditions of the Federal award. [EDGAR § 200.300](#); [2 C.F.R. 200.303\(a\)](#).

Fiscal Year Period

“Fiscal Year” means a year used as an accounting period. The State of South Carolina, including South Carolina’s school districts, uses a fiscal year that begins July 1 and ends June 30. The Federal fiscal year is October 1 through September 30. However, Federal education funds are appropriated for 15 months and have a performance period from July 1st to the next September 30th each year.

ED releases Preliminary Title I, Part A allocations in the spring of each year. These preliminary allocations support LEAs in planning. In early summer, ED releases Final Title I, Part A allocations. On occasion, ED releases revised final allocations later in the year. This does not change the fact that Title I funds have a period of performance that starts July 1st and runs through the following September 30th (15 months) and then another 12 months for carryover from October 1st through September 30, totaling 27 months to obligate funds.

EXAMPLE			
Funding Year	Allocation Release	Allocation End Date W/O Carryover	Allocation End Spending With Carryover
2025/2026	July 1, 2025	September 30, 2026 (15 MONTHS)	September 30, 2027 (ADDITIONAL 12 MONTHS)

Federal Financial Management Standards

Grant and sub-grant recipients must meet the following financial management standards:

- **Identification of grant information:** The LEA must identify, in its accounts, all Federal awards received and expended and the Federal programs under which they were received. Federal program and award identification must include, as applicable, the Assistance Listings (formerly referred to as the CFDA) title and number, Federal Award Identification Number (FAIN), year the Federal award was issued, name of the Federal agency, and, if applicable, name of the pass-through entity.
- **Financial Reporting:** Accurate, current, and complete disclosure of each Federal award or program's financial results must follow the financial reporting requirements in 2 C.F.R. 200.328–29 and Part 76 of EDGAR.
- **Accounting Records:** The LEA must maintain records that adequately identify the amount, source, and expenditure of federal funds for federal awards. These records must contain information pertaining to the identity of the grant or subgrant awards, authorizations, financial obligations, unobligated balances, assets, expenditures, income, and interest, and be supported by source documentation.
- **Internal Controls:** Effective control and accountability must be maintained for all funds, real and personal property, and other assets. *The LEA must adequately safeguard all assets and ensure that they are used solely for authorized purposes.*
 - The LEA must establish, document, and maintain effective internal controls. “Internal controls” are tools to help program and financial managers achieve results and safeguard the integrity of their program. Internal controls should be designed to provide reasonable assurance that the following objectives are achieved:
 - Effectiveness and efficiency of operations.
 - Adequate safeguarding of property.
 - Assurance that property and money are spent in accordance with the grant program and to further the selected objectives; and
 - Compliance with applicable laws and regulations.
 - The LEA must evaluate and monitor its compliance. When instances of noncompliance are identified, the district must take prompt action to correct any identified noncompliance. In addition, the LEA must take reasonable cybersecurity and other measures to safeguard information, including protected

personal identifiable information (PII) and other types of information. This also includes information that the Federal agency or pass-through entity designates as sensitive or other information the LEA considers consistent with applicable privacy laws. 2 C.F.R. 200.303.

- **Budget control:** Actual expenditures or outlays must be compared with budgeted amounts for each Federal award.
- **Cash management procedures:** The LEA must maintain written procedures to implement the cash management requirements, which are further described below. 2 C.F.R. 200.305.
- **Allowability procedures:** The LEA must maintain written procedures for determining the allowability of costs.

Budgets and Modifications

To ensure good fiscal control, each Federal or State grant fund recipient must establish a “line item” budget for each project. That means each expenditure account (e.g., instructional salaries, instructional supplies, and purchased services) must be allocated an estimate of the grant amount to be spent for that purpose. Planned indirect cost recoveries, equipment purchases, or transfers to other districts must also be budgeted. Federal regulations require a recipient to maintain its accounting records in a manner that allows for comparison of actual expenditures to budgeted amounts for each grant.

Subrecipients (Districts) are not usually required to submit detailed line-item budgets to the OFSA for approval. The program budget submitted to the OFSA is a categorical summary of the recipient’s line-item budget for each project; however, detailed line-item budgets may be required by the OFSA or Federal entities and auditors, at their discretion (see Project Budgets at the end of this section).

Creating a Budget in the Grants Electronic Management System

Creating Budget Details

1. The budget is created by adding budget details. To access the Budget Detail page, click on Modify in front of an Object or Function. Note: If the word “View” appears instead of “Modify,” either the application is in a status that is not able to be edited (Application Not Started, Application Completed, or an approval workflow status), or the user does not have permission to work in the application.
2. Click on “Add Budget Detail” to add a new Budget Detail item.

- The Budget Detail screen has fields for assigning the Object or Function category, Tags, Cost, and Narrative Description to a Budget Detail. You must have the Function, Object, and Cost to create the detail. Tags and narratives for all Budget Details must be created before submitting the grant application.

The screenshot shows the 'Line Item Details' and 'Narrative Description' sections of a budget application. Numbered callouts indicate the following fields and sections:

- 1:** Object: 100 - Salaries
- 2:** Reform Strategy: Ensure instruction by properly cert...
- 3:** LEA / School: Westwood Elementary (0160017)
- 4:** Quantity: 1.00
- 5:** Cost: \$56,578.00
- 6:** Line Item Total: \$56,578.00
- 7:** Narrative Description: One Third-grade teacher
- 8:** Summary table at the bottom right.

Summary	
Total for all other Budget Details:	\$700.00
Total for all Budget Details:	\$57,278.00
Allocation:	\$100,000.00
Remaining:	\$42,722.00

- Select the appropriate Function/Object from the drop-down list. What is available depends on whether you are working on Function View or Object View on the Budget page.
- The tag area contains several SCDE-defined tag types with drop-down lists that associate the line item with reform strategies and needs. Users can select more than one tag for a tag type. Upon selecting a tag, a new drop-down will appear for the optional selection of additional tags.
- The tags that are available to you are:
 - LEA/School – budget details can be assigned to the district (the default selection) or a specific school
 - Quantity – a factor that multiplies the cost for a budget detail total. It can be used if you have multiples of an item with identical costs. Generally, this is left at 1 when the line item contains multiple items, and the total of all items is put in Cost.
 - Cost – cost of an item. If the detail contains multiple items with varying costs (e.g., more than one teacher), enter the total cost and leave the quantity at 1.
 - Budget detail total – Quantity*Cost
 - Narrative – provide a description of the budget detail

- f. Totals – displays current totals for other categories, the category of this detail, the allocation, and the amount yet to be budgeted.
- 7. Click on “Create” to save the budget details. To create another budget detail in the same category, click on Add Budget Detail or use the drop-down list to create a budget detail in another category.
 - a. To modify a budget detail, click the “pencil” Edit icon.
 - b. To delete a budget detail, click on the “trash can” Delete icon.

Budget Overview

The Budget Overview is an informational summary page of all the budget details totaled by Function and Object. Use the Show Unbudgeted Categories/Hide Unbudgeted Categories link at the top left of the table to view only the summary Functions and Objects that contain values, or all Functions and Objects.

The overview can also be filtered by location using the drop-down box list of locations.



Filter by Location: All - \$58,778.00 ▼
[Hide Unbudgeted Categories](#)

Budget Validations

The system creates an error message (viewable from the Sections page) if the grant’s budget does not match the allocation. On the Budget page, the amount for “Remaining” must equal zero before the application can be completed.

Some grants also have validations for Function categories linked to their program detail pages. See the specific instructions for the Budget validations for specific grants in the SCDE Funding Application Program Pages in this guide.

Amendments - General Information

Amendments must receive approval from the OFSA before loading into the Grants Accounting Processing System (GAPS). Please work with the assigned SCDE Title I Program Manager to expedite this process.

The District can initiate an amendment when there is a necessary and justified adjustment to the approved grant budget or scope of work to ensure a successful outcome for the funded program. 2 C.F.R. 200.308. This document outlines the process LEAs must follow to amend within the Grants Electronic Management System (GEMS).

Certain types of post-award changes in budgets and projects require the prior written approval of the Office of Federal and State Accountability. They include:

Basic Amendments:

- a. The LEA initiates a revision within GEMS based on need. These needs could include functional area changes, budget modifications, or narrative adjustments.
- b. The LEA revises GEMS within the budget and/or the LEA Set Asides page and submits the revisions to the State Education Agency (SEA) for review and approval.

Additional funding by SEA:

- a. The SEA may adjust initial funding based on the U.S. Department of Education's (ED) allocation revisions or additional funding.
- b. The GEMS project will automatically move into a Revision Started status. LEAs must complete the revision for SEA approval.
- c. LEAs must budget any additional funding and provide a clear narrative for the SEA to determine allowability.
- d. Revisions should occur within the budget on the LEA Set Asides page and the Allocations to Served Schools page if needed. These pages must match the budget revisions.

*Ranking must be maintained with additional funding. The Grants Accounting Processing System (GAPS) will require LEAs to budget the additional funds before making claims.

Large Amendments:

LEAs may pull back schoolwide funds to the LEA level after September 30th of the first year of the grant. This option must be explained to schoolwide principals before the start of the

grant. LEAs may use these funds for any activities supported by 34 C.F.R. 200.77.

The LEA must:

- a. Determine which activities and funding were not utilized by September 30.
- b. Pull back any unused/unclaimed funds from EACH schoolwide into an allowable LEA set aside.
- c. Make necessary revisions within the budget.
- d. The Allocation to the Schools page and the LEA Set Asides page in GEMS will not require any modifications; these pages will remain the same.
- e. The GEMS system will generate validation messages related to the modifications.

*As a reminder, it is unallowable to pull back funding from one school and give it to another school.

Budget Amendments

Budget amendments are submitted in GEMS and must be reviewed and approved by the OFSA. Ensure the plan clearly explains and defines all changes and new requests. All supporting documentation and justifications must be uploaded to GEMS to support change requests and requests for approval. Please contact your district's designated program manager with additional requests or questions. Once amendments are submitted, your program manager will review the amendments in their entirety to ensure accuracy, reasonableness, and allowable use of funds. Your program manager may request additional information as needed. Once your program manager has approved the amendment, the amendment will move to its second level of review by the Director. The Director may also request additional information as needed. Once the Director approves the plan, the District can implement the new changes.

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Announcements

MOE Information- Greg King (8/12/2024)

Quite a few districts are showing a substantial gain in their Maintenance of Effort in the 2024-25 Title I plan submission. Remember that districts are expected to be within 90% of this number next year. To avoid an issue with not meeting Maintenance of Effort next year, please begin planning with your finance director immediately to meet this requirement. If you have any questions, contact Dr. Gregory King at 803-734-0025 or gking@ed.sc.gov.

(5/28/2024)

The Consolidated Finance and Application (CFA) team plans to distribute additional 23 grant funding this week. Recipients received emails from

Obligations and Expenditures

“Obligations” are orders placed, contracts awarded, and goods and services received but not paid for during the project period. The table below shows when an obligation of funds may occur.

If the obligation is for:	The obligation is made:
Acquisition of real or personal property	On the date on which the state or subgrantee makes a binding written commitment to acquire the property.
Personal services by an employee of the state or subgrantee	When the services are performed.
Personal services by a contractor who is not an employee of the state or subgrantee	On the date on which the state or subgrantee makes a binding written commitment to obtain the services.
Performance of work other than personal services	On the date on which the state or subgrantee makes a binding written commitment to obtain the work.
Public utility services	When the state or subgrantee receives the services
Travel	When the travel is taken.
Rental of real or personal property	When the state or subgrantee uses the property.
A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR Part 200, Subpart E—Cost Principles	On the first day of the grant or subgrant performance period.

See 34 C.F.R. 76.707.

Obtaining Approval in GEMS before Incurring Obligations

Earliest Date to Obligate Funds

No funds may be obligated or expended before July 1, since it is the start of the fiscal year. The budget and amendments must be submitted to the OFSA and approved before making obligations or expenditures above the previously approved budget.

Claims for reimbursement must be made at least quarterly and consistent with calendar quarters (e.g., an expenditure report claim for costs for January 1 through March 30 must be filed by May 15). LEAs have 45 days following the end of a quarter to submit claims for that particular quarter. LEAs are expected to meet quarterly, claiming expectations as described in the table below. If an LEA does not anticipate meeting the expectation, an email including the district’s justification must be submitted to the OFSA.

Grant	Claiming Percentage Expectation/ Target Y1/Q1 (July 1 - Sept 30)	Claiming Percentage Expectation/ Target Y1/Q2 (Oct 1 - Dec 31)	Claiming Percentage Expectation/ Target Y1/Q3 (Jan 1- March 31)	Claiming Percentage Expectation/ Target Y1/Q4 (April 1 - June 30)
Deadli ne	Deadline for Claiming - November 15	Deadline for Claiming - February 15	Deadline for Claiming - May 15	Fiscal Year-End Deadline for Claiming - August 15
Title I	-	40%	60%	85%
Title II	-	15%	30%	50%
Title IV	-	15%	30%	50%
Title V	-	-	35%	50%

Grant	Claiming Percentage Expectation/Target Y2/Q1 (July 1 - Sept 30)	Claiming Percentage Expectation/ Target Y2/Q2 (Oct 1 - Dec 31)	Claiming Percentage Expectation/Targ et Y2/Q3 (Jan 1- March 31)	Claiming Percentage Expectation/ Target Y2/Q4 (April 1 – June 30)
Deadlin e	Deadline for Claiming - November 15	Deadline for Claiming - February 15	Deadline for Claiming - May 15	Fiscal Year-End Deadline for Claiming - August 15 Grant Closing Deadline for Claiming - December 30
Title I	85%	90%	95%	100%
Title II	60%	75%	90%	100%
Title IV	60%	75%	90%	100%
Title V	60%	75%	90%	100%

Deadline for Obligations

The project period for OFSA-administered programs is July 1 through September 30. No obligations are allowed after the end of the grant period. However, per 2 CFR 200.403(h), administrative closeout costs are permitted until the date of the final report, which is 90 days after the end of the grant period for subrecipients per 2 CFR 200.344(b). The final request for expenditure report claims must be submitted no later than December 30th. Per State fiscal year requirements and the Generally Accepted Accounting Principles (GAAP), all expenditure reports for funds spent by the end of the fiscal year, June 30, each year, are due to the SCDE by August 15 annually. Goods and/or services received by June 30 each year must be invoiced, paid, and claimed by August 15 annually.

Title I Fiscal Procedures

Ongoing	Submit expenditure claims through GAPS at least quarterly
	Collect monthly time and effort documentation for individuals who work on multiple cost objectives.
	Submit budget amendments as needed through GAPS.
July	Submit the Title I application in GEMS by July 3. No financial obligations can be made for the new school year until the SCDE receives the Title I project application in a substantially approvable form.
	Submit carryover waiver request (if applicable)
August	Grant Award Notice (GAN), Assurances, Terms, and Conditions must be signed and returned to the Title I office.
	Expenditure claims for expenditures through June 30 th are due by August 15th in GAPS.
September	Ensure the LEA meets the 15% carryover limit by the end of the month or submit a waiver request to SCDE (allowed once every three years)
October	Final carryover figures and revised current year Title I allocations (if any) are distributed to LEAs.
	File the final budget in GAPS.
November	Begin review of personnel budgeting for the next fiscal year.
	Expenditure claims for first quarter expenditures (7/1 - 9/30) are due by November 15 th in GAPS.

December	Submit an annual comparability report.
January	Submit budget amendments as needed through GAPS.
February	Expenditure claims for second quarter expenditures (10/1-12/31) are due by February 15 th .
March	Collect data from schools to establish the poverty count.
April	Collect each school's 135-ADM for poverty counts.
May	Expenditure claims for third quarter expenditures (1/1 - 3/31) are due by May 15th at GAPS.

Carryover Funds

“Carryover” funds are grant funds that, if not obligated by the end of the performance period, remain available to the subgrantee for one additional fiscal year. Usage of carryover funds remains subject to the terms of the Federal award, all other Federal laws *in effect at the time of the award*, and the State plan or application. EDGAR § 76.709-10.

Grant project periods for most of the grants administered by the OFSA begin July 1 of the awarding year and end on September 30 of the following year. Funds that remain unobligated at the end of the project period are considered for inclusion in the ensuing year's project as carryover. That is, the unobligated funds are in addition to the amount awarded for the following year.

Carryover Restrictions for Title I

The carryover amount for Title I, Part A, Improving Basic Programs, is limited to 15 percent of a District's grant funds for districts that receive an allocation of \$50,000 or more. This calculation is based on information submitted in the final Expenditure Report and includes Title I, Part A allocated funding and any funds transferred under Title VI, Part A, Subpart 2. Excluded from the carryover calculation are:

- Carryover funds from the prior year,
- Excess funds allocated to the District by SCDE under Section 1126(c) of Title I,
- School improvement funds under Section 1003, and
- Funds received under the State Academic Achievement Program.

If the carryover restriction is exceeded, then the LEA's allocation must be reduced by the amount exceeding the 15% limitation.

A District may submit the waiver request form to carryover more than 15% for a single fiscal year to the OFSA if the district is eligible to utilize a waiver. SCDE can waive the 15% limitation if either 1) SCDE determines the District's request is reasonable and necessary, or 2) supplemental appropriations under Title I, Part A become available. A request may be granted only once every three years.

RESOURCE

[Waiver Request Form to Exceed Carryover Limitations](#)

Cash Management Requirements

The LEA must ensure cash management requirements are being met by applying compliant procedures for the drawdown and payment of Federal funds that minimize the time elapsing between the transfer of funds and disbursement by the LEA in accordance with the Cash Management Improvement Act, 2 C.F.R. 200.305. There are generally two ways to obtain Federal grant payments: reimbursement or a cash advance. As a matter of policy, SCDE only permits reimbursements.

Reimbursements

The LEA will initially charge Federal grant expenditures to non-Federal funds and then request reimbursement for actual expenditures incurred under the Federal grants. 2 C.F.R. 200.305. Consistent with State and Federal requirements, the LEA will maintain source documentation supporting the Federal expenditures (invoices, time sheets, payroll stubs, etc.) and make such documentation available for the Office of Federal and State Accountability or a representative of an applicable Federal agency to review upon request. Reimbursements of actual expenditures do not require interest calculations.

Reimbursements of Federal program funds are dependent on factors such as:

- Submission of an acceptable application.
- Timely submission of expenditures (claims) by the recipient (expenditures should be submitted at least every quarter, though they may be submitted more frequently if needed); and
- Supporting documentation, such as invoices, time sheets, trip reports, etc., is not required for reimbursement requests; however, these documents should be kept on file at the LEA for auditing and monitoring purposes.

Instructions for Preparation of an Expenditure Report (Claim)

Districts should claim expenditures using GAPS. The OFSA generates quarterly reports to track submissions. Emails are sent to Coordinators as a reminder to submit quarterly.

Reimbursements of Federal program funds are dependent on factors such as:

- Submission of an acceptable application.
- Timely submission of expenditures (claims) by the recipient (expenditures should be submitted at least every quarter, though they may be submitted more frequently if needed); and
- Supporting documentation, such as invoices, time sheets, trip reports, etc., is not required for reimbursement requests; however, these documents should be kept on file at the LEA for auditing and monitoring purposes.

The OFSA reserves the right to request this documentation to determine allowability.

Separate Accounting of Each Grant Project Required

Subgrantees must maintain a separate accounting of revenues and expenditures by fiscal year, by federal award or program.

Time and Effort Certifications

An employee whose salary and wages are supported, in whole or in part, with federal funds must document the time spent working on federal programs. This includes an employee whose salary is paid with State or local funds but is used to meet a required “match” in a Federal program. The submitted documentation is used to ensure that charges reflect an accurate account of the employee’s time and effort devoted to each Federal program. 2 C.F.R. 200.430(g) (formerly OMB Circular A-87, *Cost Principles for State, Local, and Indian Tribal Governments*).

Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- Be supported by a system of internal controls that provides reasonable assurance that the charges are accurate, allowable, and properly allocated.

- Be incorporated into official records.
- Reasonably reflect total activity for which the employee is compensated, not exceeding 100% of compensated activities.
- Encompasses both federally assisted and all other activities compensated by the LEA, or on an integrated basis.
- Comply with the established accounting policies and practices of the LEA; and
- Support the distribution of the employee's salary or wages among specific activities or cost objectives. 2 C.F.R. 200.430(g).

Various types of documentation may be used to show time and effort:

- 100% Certifications
- Personnel Activity Reports (PAR)
- Blanket Certifications

Each of these examples is further explained below. However, SCDE will accept any documentation that meets the requirements of 2 C.F.R. 200.430(g), as noted above.

Cost Objectives

Cost objective means a program, function, activity, award, organizational subdivision, contract, or work unit for which cost data are desired and for which provision is made to accumulate and measure the cost of processes, products, jobs, capital projects, etc. 2 C.F.R. 200.1.

100% Certifications

For employees who work solely on a single Federal award or cost objective, a periodic certification is required. These certifications may be prepared semi-annually or annually (as described in the LEA's procedures for time and effort) and should be signed by the employee and supervisory official who has firsthand knowledge of the work performed after the last day on the certification.

Personnel Activity Report (PAR)

A PAR may be required for employees who work on multiple activities or cost objectives.

Some examples of multiple cost objectives include:

- More than one Federal award
- A Federal award and a non-Federal award
- An indirect cost activity and a direct cost activity
- Two or more indirect activities that are allocated using different allocation bases
- An unallowable activity and a direct or indirect cost activity

When completing a Personnel Activity Report (PAR), the following are required:

- An after-the-fact distribution of the actual activity of the employee
- Make sure to include the funding source of the activity
- An account of the total activity for which each employee is compensated
- Must include the entire workday
- Prepared on a monthly basis
- Signed by the employee and supervisory official having firsthand knowledge of the work performed after the last day of the PAR

Blanket Certifications

A blanket certification for time and effort documents is a Statement used to certify that employees worked 100% of their time on a Federal program or specific/single cost objective over a specified period (usually a year or a 6-month period – similar to a 100% certification discussed above). Unlike individual certifications, a blanket certification applies to a group of employees working on the same project or cost objective. It must be signed by a supervisory official who has firsthand knowledge of the employees' work after the last day of the certification.

Reconciliation and Closeout Procedures

It is critical for payroll charges to match the actual distribution of time recorded on the time and effort certification documents. Budget estimates or other distribution percentages determined before the services are performed do not qualify as support for charges to Federal awards, but may be used for interim accounting purposes, provided that the system for establishing the estimates produces reasonable approximations of the activity actually performed. All subrecipients must perform periodic after-the-fact reviews of interim charges, but all final adjustments must be made by the end of the fiscal year to ensure that all costs are allowable, accurate, and properly allocated.

Records Retention

Each LEA is required to have specific record retention policies and procedures in place. Policies are a guiding principle used to set direction in an organization. Procedures, on the other hand, are a series of steps to be followed as a consistent and repetitive approach to accomplish an end result. It is important that LEAs understand this distinction and have all required written policies and procedures.

Record Retention Requirements

The LEA must maintain all records that fully show:

- 1) The amount of funds under the grant or subgrant.
- 2) How the subgrantee uses those funds.
- 3) The total cost of each project.
- 4) The share of the total cost of each project provided by other sources.
- 5) Other records to facilitate an effective audit; and
- 6) Other records to show compliance with Federal program requirements. 34 C.F.R. 76.730-731 and 75.730-731.

The LEA must also maintain records of significant project experiences and results. 34 C.F.R. 75.732. These records and accounts must be retained and made available for a programmatic or financial audit.

SCDE requires that documentation be maintained for a minimum of six (6) years from the date on which the final Financial Status Report is submitted, unless otherwise notified in writing to extend the retention period by the awarding agency, cognizant agency for audit,

oversight agency for audit, or cognizant agency for indirect costs. Please note this is more restrictive than the 5 years noted in 34 C.F.R. 81.31(c). However, if any litigation, claim, or audit is started before the expiration of the record retention period, the records will be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken. 2 C.F.R. 200.334.

The LEA must provide the awarding agency, the agency's Inspector General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives with the right of access to any documents, papers, or other records of the LEA which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the LEA's personnel for the purpose of interview and discussion related to such documents. 34 C.F.R. 76.910; 2 C.F.R. 200.337.

Grant Files Required

The recipient's business and/or Title I office must keep a grant file for each separate project containing the following documents for audit purposes:

- 1) Grant application
- 2) Approved budgets
- 3) Award document
- 4) Record of cash requests (copies of cash request forms)
- 5) Record of cash receipts
- 6) Cash disbursements
- 7) Matching expenditures
- 8) Important correspondence
- 9) Final reporting and closeout documents

Procurement for Federal Programs

To ensure costs are allowable, all expenditure with Federal funds must meet the Federal purchasing requirements. Therefore, all procurement transactions for the acquisition of property or services required under the Federal award must be conducted in a manner that provides full and open competition consistent with 2 C.F.R. 200.319 and 200.320.

The LEA must maintain contractor oversight and ensure it only awards contracts to responsible contractors that possess the ability to perform successfully under the terms and conditions of a proposed contract. To ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications,

requirements, Statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements.

Conflicts of Interest

The LEA must ensure that the following standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts are met.

No employee, officer, agent, or board member may participate in the selection, award, or administration of a contract supported by a Federal award if they have a real or apparent conflict of interest. Such a conflict of interest arises when the employee, officer, board member or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The LEA's officers, employees, board members, and agents may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts, unless the gift is an unsolicited item of nominal value. 2 C.F.R. 200.318(c).

The LEA's standard of conduct must include disciplinary actions for violations of such standards by the LEA's officers, employees, board members, or agents.

Organizational Conflicts (Charter School LEAs)

If the LEA employs a parent company, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, the LEA must include written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest mean that, because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. 2 C.F.R. 200.318(c)(2).

Mandatory Disclosure

Upon discovering any potential conflict, the LEA must disclose in writing the potential conflicts of interest to SCDE. 2 C.F.R. 200.112. The LEA must also disclose in writing to the SCDE, USDE, and its Office of Inspector General (OIG) whenever it has credible evidence

of the commission of a violation of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the award. 2 C.F.R. 200.113.

Whistleblower protections

An employee of a recipient or subrecipient must not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing to a person or body described in paragraph (a)(2) of 41 U.S.C. 4712 information that the employee reasonably believes is evidence of gross mismanagement of a Federal contract or grant, a gross waste of Federal funds, an abuse of authority relating to a Federal contract or grant, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract) or grant.

Methods of Procurement

Micro-purchase

Micro-purchase means a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed \$10,000. Micro-purchases may be awarded without soliciting competitive price or rate quotations if the LEA considers the price reasonable based on research, experience, purchase history, or other information and filed documents. To the maximum extent practicable, the LEA should distribute micro-purchases equitably among qualified suppliers.

The LEA may increase its micro-purchase threshold up to \$25,000 (limited under SC requirements) through an annual documented self-certification. Self-certification from the LEA includes justification and identification of the increased threshold and supporting documentation of any of the following:

- 1) The LEA is a low-risk auditee for the most recent audit per 2 C.F.R. 200.520.
- 2) The LEA receives an annual internal institutional risk assessment that identifies, mitigates, and manages financial risks; or
- 3) The increased threshold is consistent with State law.

Simplified Acquisition Procedures

In SC, simplified acquisition procedures are permitted for purchases less than \$25,000. Simplified acquisitions require that price or rate quotations be obtained from an adequate number of qualified sources, the number to be determined by the LEA.

Competitive Bids (also referred to as Requests for Proposals or RFPs)

For all purchases at or above \$25,000, competitive bids, which are commonly referred to as Requests for Proposals, must be utilized. All Federal and State laws apply, including 2 C.F.R. 200.320.

Noncompetitive Proposals (Sole Sourcing)

There are specific circumstances in which noncompetitive procurement can be used. Noncompetitive procurement can only be awarded if one or more of the following circumstances apply:

- 1) Micro-purchases.
- 2) The item is available only from a single source.
- 3) The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation.
- 4) The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the LEA; or
- 5) After solicitation of several sources, the competition is determined to be inadequate.

Subgrantees that seek authorization for a non-competitive procurement under a sub-award issued by the SCDE, as referenced in item (4), must contact the applicable program office.

Items that have been competed on State contracts are not subject to additional approval.

Each SCDE program office that manages subawards will use the form below, which can be completed with approval from the requestor, business official, procurement official, and the applicable program office. This form should be approved before obligating funds.

RESOURCE

Noncompetitive Procurement Request Form

Title I Equipment and Inventory Control and Tracking Procedures

Purpose

To ensure the maintenance and implementation of adequate controls to account for the procurement, location, custody, and security of equipment purchased with Title I funds. This procedure defines equipment as “non-consumable items with a life expectancy of more than one year and a per-unit value exceeding \$2,500.00.”

These procedures are based on the Uniform Grant Guidance, Education Department General Administrative Regulations (EDGAR), and SC State Comptroller General’s Office.

Physical Inventory Listing

Each LEA Title I Office and Title I school will maintain a current and accurate inventory record of equipment purchased with Title I funds (*a Physical Inventory Listing*). This Physical Inventory Listing will include non-consumable equipment with more than one year of life and a value of more than \$2,500.00. (*This Physical Inventory Listing is in addition to the LEA’s fixed asset inventory listing.*) Equipment purchased using district set-aside Title I funds will be listed on the district’s Physical Inventory Listing. Equipment purchased using a school’s Title I allocation will be listed on the school’s Physical Inventory Listing. Items not included in the physical inventory listing are books, classroom libraries, classroom/office supplies, workbooks, maps, charts, and globes. Items that must be included but are below the threshold (\$2,500.00) are deemed “highly walkable” items such as iPads, laptops, and other electronics.

The Physical Inventory Listing must include the following information:

- An inventory control number to include the fixed asset identification number or other inventory control number for items not listed on the fixed asset system,
- The Federal Award Identification Number (FAIN),
- The title holder,
- The percentage of the Federal agency contribution toward the original purpose,
- A description to include the model number,
- Purchase cost,
- Serial number,
- The purchase date,
- Person of custody,
- The location (office and room number),
- Use of the item,
- Condition of the item, and

- Reconciliation action.

2 C.F.R. 200.313(d).

The Title I schools, Title I district-wide programs, and Title I district office must ensure that items are added to the Physical Inventory Listing throughout the year as invoices are processed.

All lost, stolen, or missing equipment must be reported to the SEA after the item is identified as missing. LEAs must develop written procedures to prevent equipment theft, loss, and damage.

RESOURCE

Equipment Inventory Form

***The above form must be used unless the district uses an electronic inventory management system such as Destiny, Asset Tiger, etc. While the electronic inventory management system's forms may look different, all the above information must be included.**

Fixed Asset Listing

The Title I Equipment Inventory Control Procedures are in addition to the district's inventory control policy or equipment listed on the district's fixed asset inventory system.

Tagging of Equipment

Equipment purchased with Title I funds listed on the LEA fixed asset inventory system must have the appropriate asset identification tag/decal per the district's policy on tagging equipment. The asset tag/decal should be placed on the equipment where it can be easily seen.

Title I equipment with a useful life of at least one year and not included in the fixed asset system will still need a tag, decal, or label to indicate a control number designated by the Title I office or school.

Physical Inventory Listing Reconciliation to Fixed Asset Listing

A physical inventory of the equipment at each location (using the Physical Inventory Listing) must be taken, and the results must be reconciled with the fixed asset listing at least once annually. Documentation of the reconciliation and any adjustments to entries to account for the differences noted during the reconciliation should be maintained.

As a part of the reconciliation process, district Title I Coordinators are urged to run expenditure reports to ensure that all required equipment, supplies, and material items have been added to the physical inventory listing for each location.

Equipment Disposition

When it is determined that original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or other activities currently or previously supported by a Federal awarding agency, [insert name of position/office responsible] will contact the awarding agency or pass-through entity for disposition instructions.

Generally, equipment disposition depends on its fair market value (FMV) at the time of disposition. If the item has a current FMV of \$10,000 or less, it may be retained, sold, or otherwise disposed of with no further obligation to the Federal awarding agency. If the item has a current FMV of over \$10,000, the Federal awarding agency or pass-through entity is entitled to the Federal share of the current market value or sales proceeds. The District may retain \$1,000 to cover expenses associated with the selling and handling of the equipment. 2 C.F.R. 200.313(e)(2).

If acquiring replacement equipment, the District may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property.

Record Maintenance

Appropriate equipment transfers and disposal forms for the fixed asset listing should be completed promptly and maintained to document any transfer or disposal of equipment (following the LEA policy).

Any mobile equipment, such as laptop computers, should have an equipment Check-Out form to document that the equipment has been removed from its location as indicated on the Physical Inventory Listing.

When equipment not on the fixed asset listing is transferred from one location to another, an Equipment Transfer Form should be completed to document that the equipment has been removed from one Physical Inventory Listing and added to another.

*All inventory records must be retained for six years from the end of the performance period, or until the end of all related litigation, whichever is longer, as is required above.

The following links provide additional information and forms.

RESOURCES:

[Title I Equipment and Inventory Control and Tracking Procedures \(Includes forms\)](#)

[Equipment Inventory Form \(Excel Download\)](#)

Disposition of Supplies

Supplies are an allowable direct charge. 2 C.F.R. 200.453. The LEA has title to all supplies acquired under the Federal award. When supplies are no longer needed for the program for which they were used, if the fair market value of the unused supplies is less than \$10,000 in total aggregate value, the LEA may dispose of the supplies without further Federal accountability.

If, however, the aggregate value is over \$10,000, the LEA may retain or sell the supplies, but in either case the LEA must compensate the Federal program in an amount calculated by multiplying the percentage of the Federal program's contribution towards the cost of the original purchase(s) by the current market value or proceeds from the sale. The LEA may retain \$1,000 to cover expenses associated with the selling and handling of the equipment.

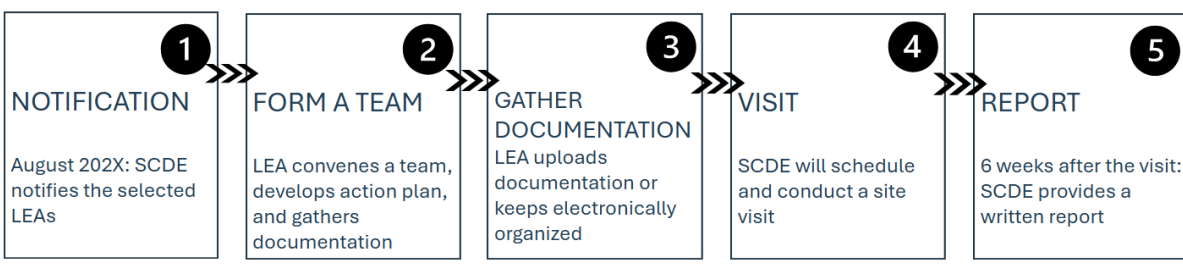
- Unused supplies are defined as those in new condition, not being used or opened.
- The aggregate value of unused supplies consists of all supply types, not just like-item supplies.

Monitoring the Title I Program

SCDE monitors requirements/compliance of all LEAs receiving ESEA funds on a four-year rotation, with exceptions for consolidating or high-risk LEAs. SCDE has implemented a consolidated approach in which Titles I, II, III, IV, V, and N&D are reviewed simultaneously. Monitoring is conducted by Desk, Hybrid, Onsite, and/or revisits as determined by SCDE.

SCDE reviews evidence previously collected from LEAs submitted materials. All LEAs will receive notification in August of each year’s monitoring schedule. LEAs selected for monitoring will receive detailed instructions for the monitoring process. After the monitoring review, LEAs will receive a written report approximately 6 weeks after the visit.

Monitoring Steps and Timeline



RESOURCE:

[SCDE Federal Programs Consolidated Monitoring Tool](#)

Appendix A: Contact List

Name	Office Number	Email Address	Area(s) of Expertise
Jewell Stanley	803-734-8131	jstanley@ed.sc.gov	Director
Gail Knight	803-734-8102	gknight@ed.sc.gov	ART, Procurement, Travel
Miranda Wise	803-734-8109	mwise@ed.sc.gov	Inventory
Consolidated Finance and Applications			
Jennifer Rhodes	803-734-8110	jrhodes@ed.sc.gov	Team Lead, Titles I, II, IV, V, and N&D
Leslie Bloss	803-734-6037	lbloss@ed.sc.gov	Title I Parent and Family Engagement, Title II, GEMS
Theresa Gregory	803-734-3749	tgregory@ed.sc.gov	Equitable Services
Sharay Mosley	803-734-0594	smosley@ed.sc.gov	Allocations, Claiming; Title V (REAP)
Makeisha Sumpter	803-734-3454	msumpter@ed.sc.gov	N&D State Coordinator
Sarah Wagers	803-734-0417	slwagers@ed.sc.gov	GANs and Budgets
Martha Walker	803-734-0968	mwalker@ed.sc.gov	Title IV
Innovation and Support			
Christina (CR) Hall	803-734-2439	chall@ed.sc.gov	Team Lead, District Calendars, Weather Make-Up Days, PBS Plans, Schools of Innovation, Waivers
Daniel Bailey	803-734-	dbailey@ed.sc.gov	PBS Plans
Erick Brunson	803-734-8107	webrunson@ed.sc.gov	Technology, Accessibility, District Calendars
Pat Ciccantelli	803-734-8306	pciccantelli@ed.sc.gov	Needs Assessments
Devetter Bradley	803-734-8331	dbradley@ed.sc.gov	Students In Poverty
Sarah Fischer	803-734-8320	sfischer@ed.sc.gov	District Calendars, Weather Make-Up Days

Student Access Advocacy and Support			
Zach Taylor	803-734-8219	ztaylor@ed.sc.gov	Team Lead, Title I, Part C - Migrant Education
James Cornelius	803-734-1485	jcornelius@ed.sc.gov	MEP Data
Dr. Ingrid Corpuz	803-734-2738	icorpuz@ed.sc.gov	Title III – Multilingual Learner & Immigrant
Kimberly Humphrey	803-734-3759	khumphrey@ed.sc.gov	Foster Care, McKinney-Vento Homeless Education
Susan Murphy	803-734-1601	smurphy@ed.sc.gov	Title III - Multilingual Learner & Immigrant
Victor Pacheco	803-394-8478	vpacheco@ed.sc.gov	Migrant ID&R & Services Statewide
Darren Truel	803-351-2099	dtruel@ed.sc.gov	Migrant ID&R & Services- Midlands
Allison Singer	803-391-9827	asinger@ed.sc.gov	Migrant ID&R & Services - Lowcountry
Amellali Marcela Villagra de Hernandez	803-521-9562	amhernandez@ed.sc.gov	Migrant ID&R & Services- Upstate
Brenda Sierra	803-509-3675	bsierra@ed.sc.gov	Migrant ID&R & Services- Lowcountry
Emily Williams	803-542-0387	ewilliams@ed.sc.gov	Migrant ID&R & Services Statewide
Birley Wright	803-734-8563	bwright@ed.sc.gov	McKinney-Vento Homeless Education
Consolidated Oversight and Monitoring			
Barret Leviner	803-734-3477	bleviner@ed.sc.gov	Team Lead, Accreditation
Daniel Ashley	803-734-8373	daashley@ed.sc.gov	Procurement
Greg King	803-734-0025	gking@ed.sc.gov	Title I Crate, Federal Monitoring
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Clint Palmer	803-734-6010	cpalmer@ed.sc.gov	Summer School

Appendix B: Acronyms

Acronym	Meaning
21st CCLC	21st Century Community Learning Centers
4K	Kindergarten for four-year-olds
9GR	A code in the student information system that indicates the first year in which a student is in the ninth grade
ACCESS	Assessing Comprehension and Communication in English State to State (South Carolina's English Language Proficiency (ELP) Assessment)
ACT	American College Test or may refer to ACT Inc., the company that produces the ACT and other tests.
ADM	Average Daily Membership
AIR	American Institutes for Research
AP	Advanced Placement or Accounts Payable
AR	Accounts Receivable
ART	Agency Routing Tool
ATSI	Additional Targeted Support and Improvement
BEDS	Basic Educational Data System
CAP	Corrective Action Plan
CCSSO	Council of Chief State School Officers
CERDEP	Child Early Reading Development and Education Program
CFA	Consolidated Finance and Applications
CFEC	Carolina Family Engagement Center

CNA	Comprehensive Needs Assessment
COE	Certificate of Eligibility
COM	Consolidated Oversight and Monitoring
COP	Committee of Practitioners
CPS	Certification Portal System
DIA	Diversity, Inclusion, and Access
DSS	Department of Social Services
DSSR	District Strategic and School Renewal Plans
DTC	District Test Coordinator
EAA	Education Accountability Act
EA	Education Associate
ED	United States Department of Education
EDGAR	Education Department General Administrative Regulations
EEDA	Education and Economic Development Act
EIA	Education Improvement Act
EL	English Learners
ELP	English Language Proficiency
EOC	Education Oversight Committee
EOCEP	End-of-Course Examination Program
ESEA	Elementary and Secondary Education Act
ESOL	English for Speakers of Other Languages (replaces ESL, English as a

	Second Language)
ESSA	Every Student Succeeds Act (2016 amendments to ESEA)
FACE	Family and Community Engagement
FERPA	Family Educational Rights and Privacy Act of 1974
FY	Fiscal Year
GA	General Assembly
GAAP	Generally Accepted Accounting Principles
GAN	Grant Award Notification
GAPS	Grants Accounting Processing System
GEPA	General Education Provisions Act
GEMS	Grant Electronic Management System
HLS	Home Language Survey
I&S	Innovation and Support
Id&R	Identification and Recruitment
IDEA	Individuals with Disabilities Education Act
LEA	Local Education Agency
LOA	Local Operating Agencies
MEP	Migrant Education Program
MOA	Memorandum of Agreement
MOE	Maintenance of Effort
MOU	Memorandum of Understanding

MSIX	Migrant Student Information Exchange
MTSS	Multi-Tiered System of Supports
N&D	Neglected, Delinquent, or At-Risk
NAEHCY	National Association for the Education of Homeless Children and Youth
NCES	National Center for Education Statistics
NCHE	National Center for Homeless Education
OCR	Office of Civil Rights
OECE	Office of Early Childhood
OEELD	Office of Educator Effectiveness and Leadership Development
OELL	Office of Early Learning and Literacy (S.C. Department of Education)
OES	Office of Educator Services
OFSA	Office of Federal and State Accountability
OMB	Office of Management and Budget
OME	Office of Migrant Education (U.S. Department of Education)
ORDA	Office of Research and Data Analysis (S.C. Department of Education)
OSes	Office of Special Education Services (S.C. Department of Education)
OSIS	Office of Student Intervention Services
OSY	Out-of-School Youth
PD	Professional Development
PIP	Pupils in Poverty

PLO	Professional Learning Opportunities
PU	Palmetto Unified
REAP	Rural Education Achievement Program
RFP	Request for Proposals
RLIS	Rural and Low-Income Schools
RTI	Response to Intervention (tiered model of service/interventions)
SAIPE	Small Area Income and Poverty Estimates
SCDC	South Carolina Department of Corrections
SCDE	South Carolina State Department of Education
SCDJJ	Department of Juvenile Justice
SCGSAH	South Carolina Governor’s School for the Arts and Humanities
SCGSSM	South Carolina Governor’s School for Science and Mathematics
SCMEP	South Carolina Migrant Education Program
SCPASS	South Carolina Palmetto Assessment of State Standards
SCPCSD	South Carolina Public Charter School District
SC READY	South Carolina College- and Career-Ready Assessments
SCSDB	South Carolina School for the Deaf and Blind
SEA	State Education Agency (S.C. Department of Education)
SIDN	School Identification Number
SIP	Students in Poverty
SNS	Supplement Not Supplant

TANF	Temporary Assistance for Needy Families
TESOL	Teachers of English to Speakers of Other Languages
TSI	Targeted Support and Improvement
UGG	Uniform Grant Guidance
UGP	Uniform Grading Policy
WIDA WIDA Screeners WIDA Model	World-Class Instructional Design and Assessment WIDA Screener WIDA Model