

## Maximizing the Use of Title I Funds

The goal of this document is to help chief state school officers determine if their schools are taking full advantage of the federal Title I program. Many states limit the use of Title I funds in ways that are not required by federal law. These limitations are often unintentional and caused by confusion over Title I’s complicated compliance requirements.

As a result, many comprehensive education reform and school turnaround initiatives that can be supported with Title I funds are not. For example, many interventions that schools fund with School Improvement Grant (SIG) funds—such as using an external partner, improving the rigor of a school’s curriculum, and implementing positive school climate activities—may often be supported in Title I schoolwide schools with Title I funds.

This document highlights three common misperceptions about how Title I funds may be used and highlights state opportunities to maximize the use of Title I funds at the school level.

Common State-Imposed Restrictions on Title I <u>Not</u> Required by Federal Law	Federal Requirement/Background
<p><b>Restriction:</b> Limiting the academic subjects that can be supported with Title I funds.</p> <p><b>EXAMPLE:</b> Some states and districts, through policy or practice, limit the use of Title I funds to only costs associated with reading and math. Other subjects, such as science, engineering, social studies, etc. cannot be supported with Title I funds in these states.</p>	<p><b>Federal Requirement:</b> The Title I statute does not require Title I funds to be used only for specific subjects.</p> <p><b>Background:</b> Some states and districts believe that because Adequate Yearly Progress (AYP) under No Child Left Behind (NCLB) is based on reading and math scores on state assessments, Title I funds can only be used for these subject areas. This limitation is not required by federal law.</p>
<p><b>Restriction:</b> Limiting Title I only to instructional costs.</p> <p><b>EXAMPLE:</b> Some states and districts limit the use of Title I funds only to instructional costs, such as teachers, paraprofessionals, or instructional materials.</p>	<p><b>Federal Requirement:</b> Federal law permits Title I funds to be used for non-instructional costs if these costs will help improve student achievement. Therefore costs including (but not limited to) <b>positive behavioral supports, attendance incentive programs, parent/community engagement, and school climate interventions are permitted</b> if needed to improve student achievement. In a targeted assistance program, these costs may only benefit students most at risk of failing to meet State academic achievement standards; in a schoolwide program, such costs may benefit all students.</p> <p><b>Background:</b> Some states have limited the use of Title I funds to instructional costs. The statute does not impose such a limitation, and U.S. Department of Education guidance specifically permits such costs.</p>

Common State-Imposed Restrictions on Title I <u>Not</u> Required by Federal Law	Federal Requirement/Background
<p>Prohibiting Title I funds to be used for comprehensive interventions in a schoolwide program.</p> <p><b>EXAMPLE:</b> Many states do not permit Title I funds to be used for comprehensive interventions, like improving a school’s curriculum, conducting data analysis activities, instituting teacher planning time, etc. in a Title I “schoolwide program” setting.</p>	<p>The schoolwide program model (for high-poverty schools and priority and focus schools in ESEA Flex approved states) <b>permits Title I funds to be spent on comprehensive interventions.</b> Many activities that are commonly supported under the School Improvement Grant (SIG) program can also be supported with traditional Title I funds in a schoolwide setting such as:</p> <ul style="list-style-type: none"> <li>• Strengthening the curriculum</li> <li>• Partnering with external providers</li> <li>• Implementing a community school model</li> <li>• Teacher support activities (such as using financial incentives to recruit and retain teachers/induction programs for new teachers in a school/instituting common teacher planning time)</li> <li>• Parent and community engagement activities</li> </ul> <p>If a school’s needs assessment and schoolwide plan indicate that comprehensive activities will help improve the school as a whole, particularly for the most struggling students, comprehensive reforms in schoolwide programs can be supported with Title I funds.</p> <p><b>Background:</b> Confusion over Title I’s supplement, not supplant requirement (which applies differently in schoolwide schools) causes many states to believe that Title I can only be used for “add-on” services or staff in a schoolwide setting, and that Title I funds cannot be used to support comprehensive initiatives. In addition, certain state practices (like requiring schoolwide schools to maintain a list of students who will be served with Title I – which is not required by federal law) limits the opportunity for schools to think about using Title I funds to support comprehensive reforms.</p>

Some states are tackling state-imposed barriers to using Title I funds by:

- Issuing state-developed guidance emphasizing the broad ways in which Title I funds may be used;
- Ensuring Title I application tools and processes are consistent with state policy (i.e. drop down menus, state review and feedback, etc. are consistent with state policies on Title I);
- Conducting trainings with LEA and schools specifically on how Title I funds may be used;
- Eliminating state-imposed barriers which can lead school districts to believe that Title I can only be used for a narrow set of costs (barriers could include onerous application or reporting requirements, requirements to maintain a list of students in schoolwide schools, lack of flexibility with regard to federal time and effort requirements, etc.); and
- Re-tooling state monitoring approaches to ensure they are consistent with state policy.

