



Washington Office of Superintendent of
PUBLIC INSTRUCTION

TITLE I, PART A PROGRAM GUIDE

*Tools and Tips for Title I, Part A
Directors*

TITLE I, PART A PROGRAM GUIDE

Tools and Tips for Title I, Part A Directors

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INTRODUCTION

The Title I, Part A Guide is designed to guide local educational agencies' (LEAs) Title I, Part A directors and staff through the process of creating and maintaining an effective Title I, Part A program. While it is not meant as a substitute for federal law, it does provide instructions for basic program requirements, administration, fiscal procedures, accountability, and other useful information needed to implement the various components of the federal programs found in the reauthorization of Title I, Part A of Every Student Succeeds Act (ESSA) of 2015. There is a Title I, Part A Fiscal Handbook that should be read in conjunction with this Guide.

This Guide is based on the interpretation of ESSA, the regulations and guidance issued by the U.S. Department of Education (ED). It includes several samples, which are not intended to be applicable to every situation. The samples are not official templates, and if used, should be adapted to specific LEA requirements. If there is any doubt as to the applicability of the samples, the Title I, Part A Department at the Office of Superintendent of Public Instruction (OSPI) advises each LEA to consult with our office.

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

The Purpose of the Title I, Part A Program

The Title I, Part A program is designed to provide additional learning supports to students in need. Across Washington, Title I, Part A provides millions in federal funds to LEAs and schools each year.

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. Title I, Part A programs and services provide customized instruction and curricula that helps students meet academic standards and take an active, engaged interest in what they learn and can do. 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. One-third of the public schools in Washington State operate Title I, Part A programs, providing academic services to over 400,000 students annually.

Title I, Part A is a federally funded program. Its requirements are established by federal law, federal non-regulatory guidance, further augmented by state guidance. Title I, Part A has federal compliance, audit, and data reporting requirements.

TITLE I, PART A PROGRAM SUPPORT

Tips for New Title I, Part A Directors

1. **Read** this Guide and the Title I, Part A Fiscal Handbook at [Fiscal Website-Look for the Fiscal Guidance Documents Tab](#).
2. **Visit** the [Title I, Part A](#) website and read the various Title I, Part A Non-Regulatory Guidance about (see links on page 43).
3. **Review** information contained in your LEA's Targeted Assistance (TAS) protocols or Schoolwide (SWP) plans. Read your LEA's most recent Title I, Part A Education Grant Management System (EGMS) application, state required School Improvement Plan (SIP), and supporting materials, including the budget.
4. **Read the accountability reports.** Use OSPI's website to view LEA and school Report Cards.
5. **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.
6. **Consult with private schools that are 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.
7. **Read your LEA's policies governing Parent and Family Engagement**, data collection and use, professional development (PD), and the dissemination of annual notices to parents (e.g., LEA PFE Policy, Parent Compacts, LEA/School Report Cards, Parents' Right-to-Know, etc.).

TIPS

Add the Title I, Part A website to your favorites. This website has a wealth of resources to guide and support you throughout the year.

Organization and Record Keeping

1. **Use this Guide** and other resources to develop a calendar and process for collecting information and data throughout the year to ensure compliance and program quality.
2. **Set up your files using the Title I, Part A Federal Program Review Checklist Monitoring Tool** as an organizational framework. Keep current documents that will serve as evidence for each area.
3. **Keep current copies of 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 program, date of exit, and reason for exit (e.g., academic exit, moved, dropped by parent request, etc.).
4. **Records Retention Guidance for School Districts** OSPI does not have the legal authority to provide retention guidance, legal advice, or compliance oversight to local governments,

including school districts, under the Public Records Act or RCW 40.14. We recommend that districts consult their Agency Records Officer, Public Records Officer, or legal counsel for support. Districts may also contact Washington State Archives by emailing recordsmanagement@sos.wa.gov for assistance related to records retention or management questions.

Technical Assistance

1. **Sign up for OSPI's Title I, Part A Program–GovDelivery Email System** to ensure you receive updates and other information provided from OSPI. *Subscribe to Title I, Part A [here](#).*
2. **Take advantage of Statewide and Small LEA Network Meetings.** These meetings provide updates and guidance from Title I, Part A and other programs at OSPI. They also provide an opportunity to learn from your peers. Currently, these meetings are virtual only. For Network Meeting schedule, go to the [Professional Learning Opportunities for Title I, Part A and LAP \(ospi.k12.wa.us\)](https://ospi.k12.wa.us).

TITLE I, PART A GUIDE AND PROCEDURES

The *Title I, Part A Guide* is intended to assist Title I, Part A Directors in managing their Title I, Part A programs throughout the school year. The Guide does not include all Title I, Part A activities. It is intended to provide resources for Title I, Part A Directors in planning and implementing local Title I, Part A programs. The Title I, Part A Guide is organized into the following categories:

Program Design and Evaluation

- Lists suggested dates for conducting annual activities related to identifying needs, evaluating efficacy, and coordinating service delivery within schools.

Parent and Family Engagement (PFE)

- Contains information related to engaging families as partners in the education of their children, and related timelines for conveying time-sensitive information to parents about accountability, teacher qualifications, and PFE.

Title I, Part A Funding Application

- Contains basic information and timelines for procedures that must be completed to apply for Title I, Part A funds each year.

Fiscal Procedures

- Contains timelines related to the maintenance of documentation describing how Title I, Part A funds are spent, and key dates related to the Title I, Part A grant application process through EGMS.

Data Collection and Management

- Contains information intended to assist Title I, Part A Directors in key recordkeeping tasks and data collection due during and closing the year.

Year at-a-Glance

The document summarizes key dates in the school year pertaining to Title I, Part A, such as program applications, reports, and other technical assistance.

Closing School Year		
Starts	Item	Due
Ongoing	Title I, Part A Reporting • Collect, track, and submit applicable TAS data to the Student Information System (SIS) (e.g., year-round data collection).	Ongoing
Title I, Part A Technical Assistance	• Final Day to Submit prior year Budget Revisions October 15 • Final Claims for prior year Grant Expenditures November 15 • For questions regarding claims and budget amendments, please contact title1a@k12.wa.us.	
May	Learning Assistance Program (LAP) Report Prior Year Student data is collected in 1) LEA's Student Information System (SIS), 2) submitted to CEDARS, and 3) finalized, with school and district-level data, in EDS.	September
LAP Technical Assistance	• For questions regarding reporting procedures, application use, or data certification, contact Lisa Ireland, Data Analyst, 360-725-6358, AskSI@k12.wa.us. • For technical support, districts should contact EDS Support,	

Closing School Year		
Starts	Item	Due
	eds.support@k12.wa.us For questions regarding program laws and implementation, contact the LAP Team, 360-725-6100, LAP@12.wa.us.	

Current School Year		
Starts	Item	Due
June	Pre-Application (Intent to Participate, Transferability, and Substantially Approvable Status (SAS)) (Required) EGMS Consolidated Grant Application	Recommended July 1
	Pre-Application Due Date EGMS Consolidated Grant Application	The day prior to the application due date
Title I, Part A Technical Assistance	Start Date for Title I, Part A Grant Awards—the Pre-Application enables the LEA to charge expenses back to the date the Pre-Application was submitted, but no earlier than July 1. Pre-Application submitted by July 1 = July 1 start date. Pre- Application submitted on July 2 or after = date the Pre-Application was submitted.	
August	EGMS Consolidated Grant Application <i>If applicable, complete End of Year Report Private School Student Count</i>	September
May	Learning Assistance Program (LAP) Report Prior Year Verify acceptance of Funds and Assurances for the current School Year are completed in the Fund Allocation Tab in the LAP Report in EDS.	September 30

Current School Year		
Starts	Item	Due
LAP Resources	• LAP See program guidance, resources, and tools • EDS Application User Guides See LAP Report User Guidehttps://www.k12.wa.us/data-reporting/reporting/cedars • Budget Preparations See LAP Budget Calculator	
Starts	Item	Due
October 1 or when CGA is approved	Title I, Part A Comparability Report EGMS Progress Report	November 28
Title I, Part A Equitable Services Technical Assistance	Start of the School Year Reminders, Notifications, Implementation Requirements • Parent Notification Requirements for LEAs and Schools Title I, Part A Parent and Family Engagement webpage • Private School Services—Begin at the same time as services begin in public schools.	
Starts	Item	Due
January	Title I, Part A Program Review (PR) Cycle	Concludes in May
January	Carryover Funds Budget Amendments EGMS Amendment	February
Before the start of the current school year	Schoolwide Waiver 40% Poverty Threshold (Optional) <i>EGMS Consolidated Grant Application Supporting Document Upload.</i> Waiver	August
Equitable Services Technical Assistance	• Private Participation in Federal Programs—Bulletin and Webinar comes out before March.	
Starts	Item	Due

Current School Year		
Starts	Item	Due
February	Low Income Percentage Coordinate with appropriate staff to check percentages posted on School Apportionment before finalization.	March 31
March–April	Private Participation in Federal Programs LEAs notify Private Schools when the Private Participation in Federal Programs application is open in EDS. Private schools indicate their intention to participate in various federal programs by completing the application in EDS.	April
Equitable Services Resources	• Private School Participation in Federal Programs Click on the “Resources” Accordion Menu	

PROGRAM DESIGN IN TITLE I, PART A

Each LEA’s Title I, Part A Director needs to ensure that their Title I, Part A schools and district-wide programs focus on high quality, standards-based teaching and learning for public school and eligible private school students. Through the provision of supports for teachers and students in SWP schools and TAS schools, and the collection of data on the efficacy and impact of those supports, the Title I, Part A Director helps ensure enriched learning experiences for Title I, Part A eligible students.

Starts	Title I, Part A Year-at-a-Glance
Ongoing	□ Collect, analyze, and synthesize comprehensive needs assessment data. □ Attend Statewide Network Meetings and PD activities to stay well informed of current policies, practices, and research.

Starts	Title I, Part A Year-at-a-Glance
August to October	☐ Review and update needs assessment and program evaluation procedures as needed. If applicable, review and update SWP plans and TAS program protocols. ☐ Design evaluations for Title I, Part A funded: ☐ PFE policy/plans. ☐ PD activities for impact on student learning. ☐ Initiate planning process for new SWPs, if applicable (i.e., yearlong planning process).
November	☐ Review and revise SWP plan or TAS protocols as needed.
February	☐ Coordinate with early childhood centers to plan transition of preschool students.
May–June	☐ Evaluate the impact of program activities through a needs assessment. ☐ Use the findings to drive future planning and decision-making

Programs in Title I, Part A

After the LEA has determined a projected allotment for each school, the LEA must collaboratively work with the school to develop a Title I, Part A plan for using the funds to operate one of the following models:

Operating a Targeted Assistance School Program (TAS). The program for this model should be based on a needs assessment and aligned to overall school objectives or goals. In general, the program includes how students will identify for the targeted program and how the impact of services and supports that have been implemented will be monitored and assessed. Any school with a poverty average of at least 35% or the district's poverty average (whichever is lower) is eligible to operate a Targeted Assistance Program.

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 PFE activities are designed for those students identified and provided with services through the TAS program.*

Operating a Schoolwide Program (SWP). This model allows the most flexibility in the use of Title I, Part A funds. The Title I, Part A Schoolwide Plan should include a description of the annual

comprehensive needs assessment conducted for the school and the three additional required SWP components (Strategies, Activities, and Integration). An LEA may operate a SWP in the first year of being served if it assures that a year of planning has taken place. For most schools in Washington, the SIP process may meet this requirement. In general, schools must be at least 40 percent poverty to operate a SWP program, unless they receive a waiver from OSPI. See the OSPI Title I, Part A Fiscal Handbook at the [Title I, Part A Fiscal Requirements and Guidance](#) under Fiscal Guidance Documents for additional information on combining funds within a SWP program.

Evidence-Based Practices

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

Using Evidence to Strengthen Education Investments (ED Non-Regulatory Guidance 2016)

This guidance is designed to help state education agencies (SEAs), LEAs, schools, educators, partner organizations, and other stakeholders successfully choose and implement interventions that improve outcomes for students.

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 data related to education.

What Works Clearinghouse

Reports on the effectiveness of educational programs, products, practices, and policies.

Evidence for ESSA

Provides clear and authoritative information on programs that meet the ESSA evidence standards and enables educators and communities to select effective educational tools to improve student success.

OSPI's Title I, Part A Evidence-Based Practices in Intervention

Resource Guide for Systems Improvement for Directors and Practitioners

Targeted Assistance Program

A **Targeted Assistance Program** provides supplemental services to identified children who are 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 Title I, Part A schools based on their low-income percent. 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.

Eligibility: The school selects “eligible children” from this larger pool of students 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 income.

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

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

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

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

Program Design: The TAS program must be designed to address the specific needs of identified students. It must be based on a comprehensive needs assessment and include all six required components of a TAS program listed below.

Responsibilities: Title I, Part A Director and the Title I, Part A teachers who are paid with Title I, Part A funds are responsible for making sure regulations are met.

Time and Effort: For information and guidance on Title IA time and effort requirements, please refer to the *Fiscal Procedures* section of this guide.

Protocols in a TAS Program

- Needs Assessment (see note below for LEAs combining LAP and Title IA funds)
- 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

Note: For schools operating a TAS model and utilizing LAP funds, the integration of a comprehensive needs assessment (CNA) is not only the best practice it is now a requirement. The CNA process should guide both TAS and LAP program planning to ensure alignment and effectiveness.

Schoolwide Program

Schoolwide Programs allow a school to consolidate its federal, state, and local funds to upgrade the entire educational program. Research suggests that in schools with relatively high poverty, students' needs are more widespread throughout the entire school population. Though the school is not required to identify certain children as being eligible for services, the focus of the program must be on addressing the needs of students not meeting state academic achievement standards.

Prerequisite for Eligibility: Title I, Part A provides formula grants to LEAs, which then allocate most of these funds to individual Title I, Part A schools, based on their low-income percent. 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.

Eligibility: The school must serve an eligible school attendance area where 40% or more of the children are from low-income families.

40% Waiver: Schools can be eligible for a waiver of the 40% minimum poverty threshold for the upcoming school year. Please contact Title1a@k12.wa.us, for more information

Program Focus:

1. Supplemental services
2. Based on comprehensive needs assessment
3. Research-based practices
4. School and community engagement

Program Plan: An eligible school must first develop a comprehensive Title I, Part A Schoolwide Plan. A planning year is suggested prior to becoming a SWP program. The plan must be developed in consultation with LEA and its school support team or other technical assistance providers. It must be developed with the involvement of parents and other members of the community to be served

and individuals who will carry out such a plan, including teachers, principals, and administrators (including administrators of federal programs). If a school plans to utilize Learning Assistance Program (LAP) funds within the Schoolwide Program, the Schoolwide Plan must also incorporate LAP requirements, including the completion of a comprehensive needs assessment. This integration ensures alignment across programs and effective targeting of supports.

Responsibilities: In a Schoolwide Program (SWP), the entire school staff is responsible for supporting the implementation of the SWP plan—there is no single individual identified as “the Title I, Part A teacher.” The federal program administrator, along with all staff involved in Title I, Part A implementation, is responsible for ensuring compliance with program requirements. Staff who contribute to the Schoolwide Plan may have their roles supported with SWP funds, rather than being solely designated as Title IA funded personnel.

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

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

Three Components in a SWP

- **One**– Use a comprehensive needs assessment and annual evaluation to guide program improvement.
- **Two**–Well-Rounded Educational Strategies
 - *Strategies to meet state academic standards*
 - *Actions to support low-achieving students*
- **Three**–Consolidation of Funds Matrix

For more information on SWP and TAS programs go to: [Title I, Part A Program Models webpage](#).

Targeted Assistance (TAS) vs. Schoolwide Program (SWP)

A quick reference for Title I, Part A (Title IA) program models

Category	Targeted Assistance (TAS)	Schoolwide Program (SWP)
Eligibility	Title IA-served school attendance area.	Title IA-served school with 40% or more of students from low-income families, or with an OSPI-approved waiver if at least 35% low-income or at above LEA average.
Who Is Served	Only identified, at-risk students.	All students in the school.
Use of Funds	Provides supplemental academic support for eligible students only.	Improves the entire educational program of the school.
Student Identification	Required—based on multiple academic criteria.	Not required.
Staffing	Only Title IA-funded staff implement the TAS program.	All staff support the SWP; no distinction by funding source.
Planning Requirement	Not required.	Requires a one-year planning process and SWP plan or aligned improvement plan.
Program Focus	Targets academic interventions and services for selected students.	Strengthens instruction, learning time, and equity schoolwide.
Review & Evaluation	Reviews progress of participating Title IA students.	Reviews the schoolwide plan's impact annually for all students.
Funding Flexibility	Must coordinate Title IA funds with other resources.	May consolidate federal, state, and local funds.
Family Engagement	Required under Title IA.	Required under Title IA.

Transitioning from Targeted Assistance to Schoolwide

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

Why Transition to a Schoolwide Program (SWP)?

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

Eligibility and Waiver Information

Eligibility Scenario	Able to Transition to SWP?
Poverty rate above 40%	Yes
Already approved for SWP	Yes (no re-approval needed)
Poverty percentage at or above the LEA average	Yes, Apply for waiver
Poverty percentage less than the LEA average	No, the school is not eligible

Waiver Process:

- Upload completed [SWP Waiver](#) Form to EGMS Files tab.
- Notify OSPI by emailing Title1A@k12.wa.us.
- OSPI will confirm approval in the Collab tab.
- Contact Title1a@k12.wa.us for questions.

What's Required of the Transition?

- ☐ One-year planning period (unless a recent school improvement plan satisfies this)
- ☐ Stakeholder consultation (staff, families, community)
- ☐ Development of a Title IA Schoolwide Plan with:

- ☐ **One**– Use a comprehensive needs assessment and annual evaluation to guide program improvement.
- ☐ **Two**–Well-Rounded Educational Strategies
 - a. Strategies to meet state academic standards*
 - b. Actions to support low-achieving students*
- ☐ **Three**–Consolidation of Funds Matrix

Responsibilities of the Principal

- ☐ Understand SWP flexibility and funding use
- ☐ Guide development and updates of the SWP plan
- ☐ Align Title IA with school improvement efforts and implement evidence-based practices
- ☐ Ensure family engagement and communication
- ☐ Oversee documentation and compliance

For questions about transitioning to a Title IA schoolwide program, please email Title1a@k12.wa.us.

Coordinating and Consolidating Funds in a SWP

A school operating a Title I, Part A Schoolwide Program (SWP) has the flexibility to consolidate Title I, Part A funds with other federal, state, and local funds.

Before considering how funds may be coordinated or consolidated, school and LEA staff must identify and engage appropriate stakeholders to participate in the comprehensive needs assessment (CNA) process. Once the needs assessment is completed, stakeholders and staff can make informed decisions about how to consolidate or coordinate funds to support identified activities. This approach ensures alignment with local needs, complies with funding requirements, and promotes effective and efficient use of resources.

ESSA allows some funding sources to be blended or consolidated to support programs that improve student learning. See the [Unlocking State and Federal Program Funds](#) guidance document.

Time and Effort: For information and guidance on time and effort requirements, please refer to the *Fiscal Procedures* section of this guide. If LAP funds are combined in a Schoolwide Program, staff supported with both LAP and federal funds must still meet applicable time and effort documentation requirements.

TAS and SWP Program Evaluation Procedures

Title I, Part A program evaluations are typically conducted at the end of a program year and are

intended to measure the efficacy and impact of the LEA's Title I, Part A program.

- All aspects of the Title I, Part A program should be included in evaluation of its impact, including academic assistance provided, PFE activities and effectiveness of related policies, and private school services (if applicable).
- Evaluation data, such as periodic and summative student assessment data, and staff and parent/guardian surveys are used to evaluate the strengths and weaknesses of the program's impact on raising student achievement and in productively involving parent/guardians in their children's education.
- The Program Evaluation Procedure describes how each school's Title I, Part A program could annually evaluate the impact on student achievement.
- This procedure includes the data used, constituents consulted, process used to arrive at evaluation findings, and how these findings are utilized for planning and improvement.

The following questions are examples to guide program evaluation:

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

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

- Information is collected in the formative and summative student performance data; surveys; attendance data; and other data from students, teachers, and administrators. Additionally, a program evaluation survey is distributed to all Title I, Part A families in Title I, Part A schools. To the extent practicable, the survey is made available in multiple languages.
- The data are analyzed by the Title I, Part A Director with the assistance of other staff, as needed.
- As necessary and appropriate, the results of the analysis are shared with Title I, Part A staff, Title I, Part A building classroom teachers, principals, LEA administrators, parents, and other stakeholders to determine necessary and important changes that should be made to the Title I, Part A program to better serve its students.
- The results of the evaluation, including information about any changes to the Title I, Part A program, are shared with LEA, school officials, and distributed to all Title I, Part A

families in Title I, Part A schools. To the extent practicable, the evaluation results are made available in multiple languages.

Requirements to Address Inequity in Teacher Qualifications

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

Steps to Identify and Address Disproportionality

Step 1: Review

Examine teacher assignment data using the [OSPI Report Card](#) and the [Teacher Qualification Comparison Workbook](#). LEAs can also review the following document when it becomes available: *Data Guidance for Students' Equitable Access to Effective Educators (coming soon)*. If one or more areas of disproportionality are identified, create a plan to address it.

Step 2: Complete the Teacher Equity Checklist Plan

The district can create its own plan or use the [Plan for Addressing Disproportionality](#).

Step 3: Provide the plan during the Program Review process, if disproportionality exists.

Additional Guidance

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

Category	Selections
Root Cause Analysis (Check all that apply)	☐ Limited applicant pool ☐ Hiring/assignment policy gaps ☐ Lack of endorsement pathways ☐ Retention issues in high-need areas ☐ Other:

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

Category	Selections
Increase Access to Experienced Teachers	☐ Support job-embedded learning walks or peer observations. ☐ Stipends for teachers to attend instructional rounds or lesson study groups outside of the contracted day. ☐ Provide mentor stipends and release time for mentors and mentees. ☐ Instructional coaching for novice teachers. ☐ Other:
Increase Access to Fully Certificated Teachers	☐ Fund endorsements (testing/tuition) ☐ Partner with state-approved universities for grow-your-own pipelines. ☐ Reimburse teacher certification program costs. ☐ Other:
Increase Access to In-Field Teachers	☐ Reimbursement of test fees to add an endorsement. ☐ Tuition reimbursement to add endorsement(s) through a state-approved program. ☐ Differential pay to attract fully endorsed teachers to high-need schools. ☐ Other:
Increase Access to Effective Teachers	☐ PD aligned to evaluation outcomes. ☐ Implement co-teaching models in struggling classrooms. ☐ Trauma-informed or culturally responsive teaching PD. ☐ Other:

Key Focuses of Title I, Part A Program

Special Populations—If applicable, the LEA must review and assess resources and programs to make sure students identified as a part of special population (e.g., Homeless, Foster Care, English learners (ELs), special education, Migrant, Neglected, and Native American students) are automatically eligible for Title I, Part A services. The LEA should have a plan in place to make sure these populations have access to Title I, Part A services in an equitable manner.

Extended Learning Opportunities—the LEA’s application for Title I, Part A funds, must provide the type and description of the extended learning opportunities that will provide additional academic assistance to students in meeting the Washington State K–12 challenging academic standards. These could be extended day, pull out, additional in-class support, summer school, tutoring, or other research or evidence-based strategies. The LEA must also identify the specific needs of its special populations (preschool, homeless students, and others). These needs may include PD or early learning activities.

Professional Development—The academic success of students correlates highly with the qualifications and skills of their teachers. Ongoing PD is crucial to ensure their continuous improvement in the instructional skills needed to help all students meet or exceed proficiency

targets on state academic assessments. An LEA must ensure that sufficient resources are devoted to carry out PD activities effectively in each Title I, Part A school. A LEA may satisfy its requirement through districtwide PD activities and/or activities implemented by each Title I, Part A school.

Early Learning Activities, Preschool, and TK—Title I, Part A can support early learning activities preschool, and Transition to Kindergarten (TK) programs. For more information and ideas about Title I, Part A and Early Learning activities and programs see the [Funding Early Learning with Title I, Part A](#).

Preschools are operated at the building level, the LEA level, or in cooperation with community programs. LEAs and buildings operating a Title I, Part A preschool must comply with all Title I, Part A program requirements. When Title I, Part A funds are used for preschool programs, that program must meet Head Start education performance standards established under section 641A(a) of the Head Start Act (42 U.S.C. 9836a(a)). The specific Head Start standards applicable to Title I preschool programs are in regulations at 45 C.F.R. § 1302 Subpart C — Education and Child Development Program Services (available at: [1302 Subpart C—Education and Child Development Program Services | ECLKC \(hhs.gov\)](#)).

Transition to Kindergarten (TK) is a legislatively established and authorized kindergarten program for children who are at least 4 years old by August 31, who do not have access to high-quality early learning experiences prior to kindergarten, and have been deemed by an LEA, through a screening process and/or other instrument(s), to need additional preparation to be successful in kindergarten the following year.

Because TK is reserved for students who have been identified as needing additional support prior to entering kindergarten, Title I, Part A can be used to fund supplies, curriculum, professional development, etc. for TK classrooms and staff.

When filling out the Title I, Part A Consolidated Grant Application, TK students should not be included in the enrollment numbers on the ranking and allocating page if the TK program is attached to an elementary school building. TKs can be funded out of a building allocation (if attached to an elementary school) or via a district set-aside when conducted offsite.

For up to date TK Information and resources please see the [OSPI TK Website](#).

An LEA that receives Title I funds is required to coordinate with other early learning programs that serve children who will attend the LEA, regardless of whether the LEA uses Title I funds to operate an early education program (ESEA section 1119). An LEA is also responsible for developing agreements with other community early learning programs to coordinate services, such as establishing a Memorandum of Understanding (MOU/MOA) outlining a plan to share student information, data reporting and sharing, alignment of standards and curricula, and transition activities for children moving into public school programs. Transition activities might include sharing assessment data, promoting summer learning programs, engaging families, and implementing joint professional development opportunities that involve both community-based providers and school staff.

Summer Programs

Title I, Part A

LEAs can use Title I, Part A to support Title IA and non-Title I, Part A schools for “District Summer School.” If the LEA complies with the Title I, Part A regulations, services can be provided to Title I, Part A-eligible students, meaning they should be identified as at risk of not meeting academic standards. The summer school will operate similarly to a TAS program in that services and funds are available solely for identified students. Services in various content areas can be provided to meet the LEA-identified needs of the students’ well-rounded education.

The LEA should use the optional set-aside for Instructional Programs (Summer School/Extended Day Programs) on the Consolidated Grant Application (CGA) for the Title I, Part A Set-Aside in the Education Grants Management System (EGMS). The LEA should ensure that the Title I, Part A funds are not taking the place of state and local funds in Title I, Part A schools.

Districts can hold a district summer school for only Title I, Part A schools and would operate as a TAS unless all the schools in that grade span were SWP.

Schoolwide vs. Targeted Assistance

- If the students are all from a single Title I SWP school (or multiple SWPs), then the Summer School can operate as a SWP (as an extension of the regular year’s program).
- In a SWP Summer School, the program is an extension of the SWP Plan from the regular school year and thus, all the funds included in that plan can be used for any purpose to address the needs expressed in the plan. The funds can be used to support any student in summer school.
- If the students are from multiple schools (all TAS, or a mix of both TAS and SWP) then the Summer School will need to operate as a TAS and identify/serve only those students who need the supplemental services.

Combining Title I and LAP

- Summer programming is an allowable use of both LAP and Title I, Part A funds. LAP funds can be used together with Title I, Part A funds to support either a school program or an LEA offered program.
- LEAs should be mindful of organizing the program so that it is easy to identify students for reporting purposes.
 - Title I, Part A does not require to report students in a Summer program.
 - The LAP program requires to report students, for example, staff serving grade 1 students could be paid for with LAP, and staff serving grade 2 students with Title I, Part A. *LAP-served students will be reported in the summer school tab in the LAP end-*

Equitable Services in Title I, Part A

Equitable Services to Private School districts are required to provide eligible children attending private elementary and secondary schools, their teachers, and their families with Title I, Part A services or other benefits, such as PD, PFE, and materials and supplies (on loan from the public schools), that are equitable to those provided to eligible public-school children, their teachers, and their families.

When	Private School–Equitable Services Year-at-a-Glance
On Going	□ The school district conducts consultation with private schools throughout the year to ensure timely, appropriate, and meaningful services are provided to eligible students, teachers, and families. ESEA programs include Title I, Part A; Title I, Part C (Migrant); Title II, Part A; Title III, Part A; Title IV, Part A; Title IV, Part B, and Carl D. Perkins.
January/February	OSPI Ombudsman for Federal Program Equitable Services distributes the Private School Participation in Federal Programs bulletin to school districts and private schools. Bulletin provides detailed information and instructions for school districts and private schools for participation in federal program equitable services.
March/April	□ OSPI Ombudsman provides a webinar regarding the Private School Participation in Federal Programs process. □ Private Participation in Federal Programs Application (Intent to Participate)–Educational Data System (EDS) ○ Opens March through mid-April. ○ Must be completed by an approved private school to participate in equitable services. School district responsibilities related to the Private School Participation in Federal Programs application process: □ Contact all private schools in the district’s boundaries to let them know of the opportunity to participate in federal programs. □ Continue to contact any private school that has not completed the application during the time the application is open to remind and/or assist them in completing the application. □ Document multiple contacts in the contact log. □ After the application closes, school districts begin contacting private schools in their boundaries regarding participation in federal programs for the upcoming school year. □ School district in collaboration with the private school, begins to plan for the upcoming year.

When	Private School–Equitable Services Year-at-a-Glance
	OSPI responsibilities related to the Private School Participation in Federal Programs Application process: ☐ OSPI emails reminders to all school districts and private school administrators regarding application opening and submission deadline.
May/June	☐ OSPI Ombudsman provides school districts with a list of out-of-district schools that choose to participate in Title I, Part A and Title IV, Part B. ☐ The school district contacts all out-of-district private schools to identify eligible students for participation. ☐ School districts, in collaboration with the private schools, plan for the upcoming school year.
July/August/September	☐ The school district completes equitable services pages in EGMS. ☐ School district enters date of initial consultation with each private school in the Private Participation in Federal Programs application (Consultations tab). ☐ The school district completes and uploads Affirmation of Consultation for each participating private school (Consultations tab). ☐ The school district completes and uploads the Title I, Part A Record of Agreed Upon Services for the upcoming school year (Consultations tab). ☐ Private school services begin at the same time as services begin in public schools.

Parent and Family Engagement in Title I, Part A

Engaging families as full partners in the education of their children is a cornerstone of ESSA. When families support learning, children are more successful in school and school success helps children become successful adults. The LEA provides opportunities for families to be actively involved in the planning, implementation, and review of school and LEA Title I, Part A programs, and maintains written school and LEA PFE policies that are developed and annually re-evaluated with, agreed upon, and distributed to parents of participating children. Communication with families should occur in the native language of the family, to the extent practicable, and interpreters utilized as necessary.

When	PFE–Year-at-a-Glance
Ongoing	☐ Engage in parent/guardian outreach and engagement and maintain documentation of these activities. ☐ Implement jointly developed school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement.

When	PFE–Year-at-a-Glance
	□ Notify parents/guardians when their child has been assigned or has been taught for four or more consecutive weeks by a teacher with limited certification and licensure.
August	□ Review and update parent/guardian notification materials (Report cards, Right-to-Know letters, etc.). Distribute them no later than the beginning of the school year. □ Review and revise PFE policies and plans in consultation with parents.
September	□ Distribute report cards (beginning of the school year, and not later than October). □ Design evaluations for LEA and school PFE activities.
October	□ Send parent guardian notification of Parents’ Right-to-Know. □ Conduct other stakeholder consultations on the development of the Title I, Part A policy (LEA and school).
November	□ Ensure School-Parent Compacts are collected. □ Ensure Title I, Part A schools with TAS programs have set up files, notified parents, and implemented TAS services.
April	□ Conduct other stakeholder consultations on the development of the Title I, Part A plan (LEA and school). □ Review and update school-parent compact.
June	□ Review and update LEA PFE policy based on data, e.g., evaluations, surveys, parent forums, focus groups.

Family and Student Partnerships in Title I, Part A

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

The Authentic Family & Community Engagement Modules: [Whole Child Initiative | OSPI](#) provide a comprehensive guide on implementing best practices within family engagement. These modules leverage family and student voices in school improvement efforts and offer strategies to build strong relationships:

Establish a Culture of Inclusion: Create an environment that values and respects the input of families and students. Encourage open dialogue and collaboration among all stakeholders involved in the school improvement process.

Conduct Surveys and Interviews: Develop surveys or interview protocols to gather feedback from

families and students about their experiences, needs, and suggestions for improvement. Ensure that the surveys are accessible and available in multiple languages if necessary.

Hold Focus Groups or Town Hall Meetings: Organize structured group discussions or town hall meetings where families and students can share their thoughts, concerns, and ideas. Provide a facilitator to encourage participation and ensure everyone's voice is heard.

Use Technology Platforms: Utilize digital platforms to gather input from families and students, especially if in-person meetings are not feasible. Online surveys, discussion boards, or dedicated communication apps can be effective tools for collecting feedback.

Involve Parents and Students in Planning Teams: Include parents and students on school improvement planning teams to ensure their perspectives are represented throughout the process. This empowers them to contribute to decision-making.

By implementing these strategies, schools can foster meaningful partnerships with families and students, ensuring that their voices are heard, their ideas are valued, and their concerns are addressed in the School Improvement Plans/Needs Assessments. This collaborative approach leads to more effective and inclusive school improvement efforts.

Resources: [The Washington Statewide Family Engagement Center.](#)

PFE Requirements

The following resource offers updated, technical guidance on implementing [Title I, Part A parent and family engagement requirements under ESSA](#). It's designed to assist State Education Agencies (SEAs), Local Education Agencies (LEAs), and schools with clear explanations, templates, and best practices. Also our [Title I, Part A Parent and Family Engagement](#) website can assist you with the following requirements:

LEA-Level Required Allocation–Implementation Under ESSA

LEAs receiving a Title I, Part A allocation over \$500,000 thousand, must set aside one percent of their LEA's allocation for PFE. A minimum of not less than **90%** of the LEA's one percent set-aside must be distributed to Title I, Part A schools for the purpose of parent-related activities—with priority given to high need schools. School staff and parents and families may voluntarily decide that some or the entire amount of the set-aside be administered by the LEA.

Note: If the LEA decides to distribute PFE funding only to the Title I, Part A high priority need schools, the LEA must have a plan in place for the other Title I, Part A schools that did not receive PFE funds. Those schools must still fulfill PFE requirements, even if they do not receive specific PFE set-aside funding.

A LEA receiving less than \$5 hundred thousand is not required to set aside funds for PFE. However, the LEA is still required to provide and promote PFE opportunities at their Title I, Part A schools.
[ESSA Title I, Part A, Section 1116]

LEA Level Requirement Under ESSA

LEAs with an allocation of over \$5 hundred thousand, must carry out at least one of the following activities and strategies consistent with the LEA's PFE policy. Maintain documentation that at least one of these activities and strategies has been implemented:

- Support schools and nonprofit organizations in providing PD for LEA and school personnel regarding PFE strategies.
- Support programs that reach parents and family members at home, in the community, and at school.
- Disseminate information on best practices focused on PFE, especially best practices for increasing the engagement of poor parents and family members.
- Collaborate, or provide subgrants to schools to enable collaboration with community-based or other organizations or employers with a record of success in improving and increasing PFE.
- Engage in any other activities and strategies that the LEA determines are appropriate and consistent with such agency's PFE policy.

LEA and School Written Policy Requirements

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

Develop a written PFE policy.

Notify parents and families of the policy in an understandable and uniform format, and to the extent practicable provide the notification in a language the parents and families can understand. Make the policy available to the local community and update periodically to meet the changing needs of parents and families, and the school.

If the LEA or school has a PFE policy that applies to all parents and families, the LEA or school may amend the policy to meet Title I, Part A PFE requirements. Additionally, if the policy under ESSA Title I, Part A Section 1112 (LEA Plans) is not satisfactory to the parents and families of Title I, Part A students, LEAs and schools must note any comments and recommendations for the respective policy. For a complete list of required LEA and school components, see [LEA and School Side-by-Side Policy Requirements](#).

LEA and School Required Strategies and Responsibilities for Building Capacity

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

Section 1116]

1. Aid parents of children served by the school or LEA, as appropriate, in understanding:
 - a. The state's academic content standards and state academic achievement standards.
 - b. State and local assessments.
 - c. The requirements of Title I, Part A.
 - d. How to monitor a child's progress and work with educators to improve the achievement of their children.
2. Provide materials and training to help parents work with their children, such as literacy training and using technology (including education about the harms of copyright piracy).
3. Educate teachers, pupil services personnel, principals, and other staff, with the assistance of parents and families, in the value and utility of contributions of parents and families.
Address:
 - a. How to reach out to, communicate with, and work with parents and families as equal partners.
 - b. How to implement and coordinate parent and family programs.
 - c. How to build ties between parents and families, and schools.
4. Coordinate and integrate, to the extent feasible and appropriate, PFE programs and activities with Head Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, public preschool, and other programs. Conduct activities, such as those found in parent resource centers, that encourage and support parents and families in more fully participating in the education of their children.
5. Ensure that information related to school and parent programs, meetings, and other activities is sent to the parents and families of participating students in a format and to the extent practicable, in a language the parents can understand.
6. Provide reasonable support for PFE activities that parents and families may request.

Title I, Part A Parent Notice Requirements

Each year, as part of the Title I, Part A provisions to support the PFE requirements, LEAs and schools receiving Title I, Part A funds must provide certain information to parents and families, and students participating in Title I, Part A programs. For information regarding Title I, Part A parent notification requirements for LEAs and schools, see [Title I, Part A Parent Notification Requirements for LEAs and Schools](#).

Accessibility

In carrying out Title I, Part A PFE requirements, LEAs, and schools, to the extent practicable, must provide full opportunities for the participation of parents and families with limited English proficiency, parents and families with disabilities, and parents and families of migratory children. Hold meetings early in the morning or in the evening to accommodate working parents. Providing information and school reports required under ESEA Section 1111 in a format and, to the extent practicable, in a language the parents and families can understand, must be included in these opportunities.

PFE Allowable Costs

LEAs and schools must provide a broad range of services designed to help parents help their children succeed at school—Section 1116 of ESSA. The activities allowed under the PFE provisions of Title I, Part A are generally linked to:

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

Find more information under the Family Engagement webpage in the LEA Role of the PFE webpage. This webpage provides LEAs and schools with examples of allowable activities in both SWP and TAS programs, as well as examples of allowable and unallowable purchases. The website also provides the list of evidence and documentation needed for auditing purposes. The PFE Activity Guide/Plan Template helps in planning PFE activities based on the five opportunity and process conditions from ED's Dual Capacity Framework, Family–School Partnerships.

PFE and Allowable Costs for Food

Under Title I, Part A, family engagement is a critical component of a school's comprehensive strategy. In some cases, providing food or light refreshments may be allowable as part of a PFE activity if it is both:

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

When Might Food Be Justified?

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

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

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

Food Purchases Documentation Requirements

Because food is not typically considered an ordinary grant cost, districts must maintain clear documentation to justify the expense. Required records include:

- An agenda that outlines the educational purpose of the activity (e.g., building family capacity to support student learning),
- Sign-in sheets, including initials and number of all participants (especially families),
- Itemized receipts showing quantities, cost per item, and vendor information,
- Explanation or rationale for why food was essential to the success of the event.

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

Additional Guidance

- Avoid food for activities with a purely social focus (e.g., banquets or celebrations).
- Food may not be provided for remote meetings or routine staff meetings.
- Federal funds may never be used to purchase alcohol.

For More Information

Please refer to the U.S. Department of Education's August 2024 guidance: [U.S. Department of Education's August 2024 FAQ](#).

Guides and Resources for Parent and Family Engagement

Our library of downloadable publications will help parents and families understand school improvement; how Title I, Part A works; what to expect from the school and district; and how to encourage academic achievement. [Guides & Resources for Parent & Family Engagement webpage](#).

LEAs and schools have a responsibility to promote and strengthen PFE within the Title I, Part A programs. There are requirements that LEAs and schools plan and implement PFE activities with ongoing meaningful consultation of the families whose children benefit from Title I, Part A services. The PFE Website lists the key components that must be implemented as part of ESSA's Title I, Part A requirements in Section 1116.

Title I, Part A, Your Child

English [Poster](#) | [Letter Size](#) | [Black/White Letter Size](#)
Spanish [Poster](#) | [Letter Size](#) | [Black/White Letter Size](#)
Russian [Poster](#) | [Letter Size](#) | [Black/White Letter Size](#)
Vietnamese [Poster](#) | [Letter Size](#) | [Black/White Letter Size](#)

What is Title I, Part A?

[English](#) | [Chinese](#) | [Korean](#) | [Punjabi](#) | [Russian](#) | [Somali](#) | [Spanish](#) | [Tagalog](#) | [Vietnamese](#)

Parents Right to be Informed

[English](#) | [Chinese](#) | [Korean](#) | [Punjabi](#) | [Russian](#) | [Somali](#) | [Spanish](#) | [Tagalog](#) | [Vietnamese](#)

Federal Programs Citizen Complaint Process

LEAs must disseminate the federal program's citizen complaint process to parents and families of students participating in the Title I, Part A program. An overview of the citizen complaint process described fully in [Chapter 392–168 WAC](#), Special Service Programs—Citizen Complaint Procedure for Certain Categorical Federal Programs.

For complaints that allege discrimination, go to Equity and Civil Rights, to review their process.

Complaints Related to Federal Programs

A citizen complaint is a written statement that alleges a violation of a federal rule, law or regulation, or state regulation that applies to a federal program.

- Anyone can file a citizen complaint.
- There is no special form.
- There is no need to know the law that governs a federal program to file a complaint.

Federal Programs Included for the Citizen Complaint Process

Title I, A Programs and Services for Struggling Learners

Title I, C Migrant Education

Title I, D Institutional Education

Title II, A Teacher & Principal Quality

Title III Limited English Proficient & Immigrant Students—Language Instruction

Title IV, B 21st Century Community Learning Centers
Title V Rural Education Achievement Program
Title VI, A Indian, Native Hawaiian, Alaska Native Education

Citizen Complaints Against an LEA, Educational Service District (ESD) or Other School Service Provider (Sub grantee)

These printable handouts outline the five-step process through which a citizen can file a complaint against an LEA or other school service provider.

[English](#) | [Russian](#) | [Spanish](#) | [Vietnamese](#)

Citizen Complaints Against OSPI

The printable handouts outline the four-step process through which a citizen can file a complaint against OSPI.

[English](#) | [Russian](#) | [Spanish](#) | [Vietnamese](#)

FISCAL PROCEDURES

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

When	Fiscal-Year-at-a-Glance
Ongoing	☐ Submit budget amendments as needed in EGMS. ☐ Verify financial status of Title I, Part A programs with fiscal department/business manager (e.g., approved allocation to participating schools, appropriate expenditure of current year's funds, payroll lists) making sure you meet ranking and allocation rules (LEAs with more than 100 students and have more than one Title IA school per grade span). ☐ Collect signed Time and Effort records (Personnel Activity Reports) for staff who work on multiple cost objectives (monthly). Complete reconciliation of personnel activity report data (quarterly).
August and September	☐ Identify data collection method for comparability calculations.
October and November	☐ Calculate comparability based on October data and make appropriate adjustments to Title I, Part A schools shown to be non-comparable. ☐ The final day to submit budget redirections is <i>October 15</i>.

When	Fiscal–Year-at-a-Glance
	☐ Review Grant Award Reporting and Processes for Federal and State Grant Received Through OSPI Bulletin Website. ☐ Submit Comparability Report EGMS Progress Report–Due by the <i>End of October</i> . ☐ Final Claims for Grant Expenditures due <i>November 15</i> .
January	☐ Complete Carryover Funds Budget Redirection EGMS Amendment.
February	☐ Collect semi-annual certification (1 of 2) for Title I, Part A personnel who works on a single cost objective. ☐ Consult with appropriate LEA staff on comparability requirements for the next school year (e.g., staff assignments, staff/student ratios, and PPE). Determine roles and responsibilities of appropriate LEA representatives and create a comparability timeline for the upcoming year. ☐ Carryover process closes– <i>February or March</i> .
March	☐ Reallocation Application (select LEAs only) <i>EGMS Amendment</i>
May	☐ Meet with LEA financial staff to reconcile fiscal issues prior to EOY closeout.
June	☐ Collect semi-annual certification (2 of 2) for Title I, Part A personnel who work on a single cost objective.

Time and Effort Basics

All employees charged to the federal grants must document the time they spent working on the grant’s objectives to demonstrate that the amounts charged to federal programs are true and accurate.

Starting with the 2024–25 school year, Local Educational Agencies (LEAs) can choose:

Option 1: The new flexible requirements in [B039-24](#) from CFR 200.430 for documentation of personnel expenses. LEAs may also combine both methods, if their policy and internal controls meet the requirements of CFR 200.430(i), or

Option 2: Use either the old Time and Effort guidance (as in bulletin [048-17](#)).

Things to consider:

- Not required to change to a new system or process.
- If your LEA is considering the new guidance, please review the new bulletin [B039-24](#) with business manager in its entirety before changing to new system.

- Staff signatures are still required for Time and Effort.

Local Educational Agencies (LEAs) may continue to follow the old time and effort regulations under Office of Management & Budget's (OMB) Circular A-87, [B048-17](#).

Option 2 Guidance

Semi-annual certifications must be completed twice a year and after the work has been completed. Typically done:

- September Through February
- March Through June

Time and Effort Requirements for Federal Programs

Schoolwide Programs: Staff funded by federal/state/local funds that are combined in a schoolwide program can meet reporting rules by certifying their time and effort every six months individually or all together. For staff funded partly by a schoolwide program and partly by another funding source, they must submit monthly reports called Personnel Activity Reports (PARs).

- Semi-annual certifications are required for all staff charge 100 percent to funds that are combined in a Title I, Part A schoolwide program. To satisfy this requirement, districts may prepare group semi-annual certifications that list all staff who work 100 percent on the schoolwide program for the period of the certification.
- Such group certifications must be signed and dated by a supervisor (such as the building the building Principal) with first-hand knowledge of the employees' activities (e.g., the principal) at the end of the certification period.

Targeted Assistance: For any building employee(s) charged, in whole or in part, to federal/state/local programs that have not been combined in the schoolwide program, time and effort must be reported using monthly PAR.

How should time worked by substitutes on federal grants be documented?

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

State Funded Staff in a Schoolwide Program

Under the assumption that state basic education funds are combined in the schoolwide program. ED guidance regarding Title I, Part A schoolwide programs provides that fund sources combined in

a schoolwide lose their individual identities and are considered a single cost objective for time and effort reporting purposes.

Employees working entirely on activities related to programs combined in the schoolwide program, even though charged only to Basic Education funds, must comply with time and effort requirements, but may do so using a group semi-annual certification.

Time and Effort and Learning Assistance Program (LAP)

Title I, Part A and LAP are considered single cost objectives because all LAP allowable activities are also allowable under the Title I, Part A regulations and both programs have the same general intent and purposes.

LAP in a Schoolwide Program: LEAs may combine their LAP base or high poverty funds with Title I, Part A in a schoolwide program. When combining funds within a schoolwide program, the intent and purpose of LAP, which is to provide supplemental instruction and services to LAP-served students, must still be met.

Semi-Annual

- The employee is paid 100% of the LAP funds. However, if LAP is combined in a schoolwide program, a semi-annual certification is required.
- The employee is paid partially out of LAP funds, partially out of Title I, Part A funds. Semi-annual certification is still required.

Monthly: The employee is paid partially out of LAP funds, partially out of non-Title I, Part A federal funds. Monthly Time and Effort is required.

Reporting requirements: Even though LAP activities may meet the same intent and purposes as Title I, Part A, LEAs need to ensure LAP-served students are identified and reported when combining funds within a schoolwide program.

Administrators and Time and Effort

Federal program directors may charge time to federal programs if they maintain monthly time and effort documentation reflecting actual time worked on each federal and state program under their supervision.

Chief Executive Officials are considered a general government cost and generally may not charge time to federal awards (pursuant to the supplement, not supplant provision).

The only exception to this rule is when any such official has specific program administration or direct student service duties **and** documents actual time spent in the performance of those duties by completing monthly time and effort records.

- Chief Executive Officials are:

- Superintendents
- Assistant Superintendents
- Building Principals
- Assistant Building Principals
- Support staff for these positions

Note: OSPI requires all LEAs to document any staff that are paid for out of funds that have been combined in a schoolwide program. For additional information about Time and Effort, please review the information available on the apportionment webpage: [Tools and Forms | OSPI](#) and the Title I, Part A, [Fiscal Requirements](#) webpage.

Food for Meetings, and Conferences – Allowability Guidance

Title I, Part A funds may be used to support meetings, conferences, and related expenses only when such costs are reasonable, necessary, allocable, and allowable under federal guidance. Food and beverage purchases, in particular, are not generally considered allowable unless there is a strong justification tied to the objectives of the grant. For full federal guidance, see the [U.S. Department of Education’s August 2024 FAQ](#).

What Does “Reasonable” and “Necessary” Mean?

Reasonable and Necessary costs mean spending wisely to meet your program’s goals without overspending. For additional guidance see: [2 CFR 200.404 -- Reasonable costs](#).

Use this checklist to guide your decision-making:

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

Comparability Report

Only LEAs that have at least one grade span with more than one school in which one or more schools receives a Title I allocation are required to submit the Comparability Report. The comparability report appears as a pending task to all users with “ESEA Consolidated Grant” selected as a program of interest in the Organization Profile in EGMS. From the Home tab, click on Pending Tasks, and click on the green arrow icon in the Actions column for the Comparability Report. Click on the Forms and Files tab and click on the pencil icon for the Comparability Report

form. Directions for completion are included on the form.

Below is a possible timeline an LEA could follow in determining comparability:

When	Comparability–Year-at-a-Glance
January–April	☐ Engage in LEA-level budget (state and local funds) discussions concerning staff assignments, and distribution of equipment and materials for the purpose of ensuring compliance with Title I, Part A comparability requirements for the upcoming school year.
May–July	☐ Conduct meetings with appropriate LEA representatives to discuss the requirements for completing the annual comparability calculations. ☐ Establish participant roles and responsibilities. ☐ Establish specific timelines for completion of the calculations. ☐ Decide which calculation methodology to use.
August	☐ Obtain preliminary information from appropriate LEA staff. ☐ Identify LEA Title I, Part A and non-Title I, Part A schools.
September	☐ Identify date and collection methodologies for gathering data needed to complete calculations.
October	☐ Collect data. ☐ Meet with appropriate staff and calculate comparability. ☐ Make corrections to Title I, Part A schools shown not to be comparable
November	☐ Reconvene appropriate LEA staff to address any outstanding issues. ☐ Maintain all required documentation supporting the comparability calculations and any corrections made to ensure that all Title I, Part A schools are comparable.

Options When Calculating Comparability

Any decisions need to be applied consistently across all schools and grade spans.

- When demonstrating compliance for comparability, an LEA may exclude state and local funds expended for:
 - Language instruction educational programs.
 - Excess state and local costs of providing services to children with disabilities as determined by the LEA.

- State or local supplemental programs (e.g., LAP) in any school attendance area or school that meets the intent and purposes of Title I, Part A. See the discussion on page 39 to determine whether such a program meets the intent and purposes of Title I, Part A. (Section 1120A(c)(5) and (d); 34 CFR 200.79)
- The comparability requirement applies to the entire school year. LEAs have the option of selecting a September, October, or November date, as these months are early in the school year.
- In a grade span, choose to compare small schools and compare large schools separately (the largest building needs to be at least twice as large as the smallest building).
- Include or exclude certain instructional staff roles across the schools, e.g., PE teachers, music teachers, art teachers, guidance counselors, speech therapists, school social workers, school psychologists, librarians (and do not include any portion of the position paid through federal funds).
- Include or exclude instructional classified staff (they may also be weighted as .5 rather than 1.0 in the calculations which may better reflect the level of intensive instruction compared to a certificated teacher. This does not reflect whether they are full-time or part-time employees.
- Calculate comparability based on staff salaries or based on staff FTE.

When A Building Is Not Comparable

When a building is shown as NOT COMPARABLE, adjustments must be made. This generally requires adding staff funded with state or local funds. Reducing the number of students enrolled may be another option but is not often used. LEAs with non-comparable buildings must:

1. Submit the comparability report by the due date.
2. Submit an email detailing how comparability will be achieved and receive approval of the plan by OSPI Title I, Part A staff.
3. Resubmit the comparability report showing comparability has been met. This should be done within the following two months.

DATA COLLECTION AND REPORTING

OSPI requires Title I, Part A LEAs to complete program data reporting activities during the year. The data from these reports is processed at the state level in CEDARS and ultimately is reported to ED in the Consolidated State Performance Report (CSPR).

Closing the Year

Reporting Title I, Part A Students–SIS to CEDARS

LEAs must report the numbers of students served in instructional programs funded by Title I, Part A during the regular school year.

CEDARS only collects information for students served with Title I, Part A TAS program services. Information regarding the total enrollment of students in SWP schools is sourced from CEDARS. The identification of these schools is not from CEDARS but from the Title I, Part A office. Below is a possible timeline the LEA could follow in determining data collection:

When	Data Collection–Year-at-a-Glance
Ongoing	☐ Collect, track, and submit applicable TAS data to the SIS (e.g., year-round data collection).
August	☐ Review and update student selection criteria sheet and student selection procedure for TAS programs. ☐ Update contact information with OSPI if needed.
May	☐ Review TAS Data in CEDARS for Title I, Part A EOY Report (see below).
August September	☐ If applicable, complete End-of-Year Report for the Private School Student Count on the EGMS Consolidated Grant Application's Private School page.

Completing Reports in CEDARS to Review Data

Title I, Part A TAS data in EGMS is a summary of student-level data submitted to CEDARS during the reporting school year. Reports within the CEDARS application allows the user to review the student-level data used to populate the Title I, Part A TAS data in the application.

Find CEDARS in the “My Application” list in EDS. If you do not have access to this application, work with your CEDARS District Administrator to access the reports or ask your [District Data Security Manager](#) to assign you a role in CEDARS that will allow you to access the application.

To view the students submitted as receiving Title I, Part A TAS services click on Reports, Attributes and Programs, Dynamic Attribute and Program Report. Then select:

1. School Year
2. Organization–data can be viewed for your LEA as a whole or by school
3. Attribute or Program–select the program you wish to view in the drop-down menu
4. Unduplicated Count–select No
5. Display–Select Student details
6. Click on Search

Attributes and Programs Reports

Dynamic Attribute and Program Report

Please select your search criteria, then click "Search".

School Year:

Organization:

Attribute or Program:

Unduplicated Count: ☐ Yes ☒ No (If Yes is selected, only students in their school of primary responsibility will be counted.)

Display: ☐ Summary Counts ☒ Student Details

Business rules for the Dynamic Attribute and Program Report:

1. The student is enrolled in the school and district at some time during the **School Year**.
2. The student is identified as receiving the service at some time during the **School Year**.
3. If "Yes" is selected for Unduplicated Count, the report displays only those students receiving services at their school of primary enrollment.

A student level detail report will be created that displays:

1. Any updates or corrections to Title I, Part A TAS data reflected in your EOY report must first be made in your SIS and then resubmitted to CEDARS.
2. Once your updated/corrected data has been successfully submitted to CEDARS it will update in EGMS.

ALLOCATIONS IN TITLE I, PART A AND THE CONSOLIDATED GRANT APPLICATION

Title I, Part A grants are formula-based (entitlement) funds for LEAs. OSPI receives preliminary and final allocations from ED. Preliminary allocations are typically sent to OSPI in the spring, and OSPI releases them to LEAs by May. Final allocations are typically sent to OSPI in early summer and released to LEAs by June or July. Use these preliminary numbers for planning purposes only. [Final allocations](#) can increase or decrease depending on multiple factors in ED's allocation calculations. The Title I, Part A allocations are based on Census Bureau data and can have significant changes based on the annual poverty estimates. Allocation numbers could also change based on Congressional actions in the future. For more information, see [Understanding Your Title I, Part A Allocation-Webinar](#). LEAs will apply, and process claims for Elementary and Secondary Education Act (ESEA) programs through the ESEA Consolidated Grant Application in EGMS for each grant cycle.

Resources: [Education Grant Management System \(EGMS\) | OSPI \(www.k12.wa.us\)](#).

Stakeholder Consultation

Title I, Part A Directors should use the preliminary allocation amount to meet with stakeholders to determine how funds will be used to support LEA and school needs in the upcoming school year. Stakeholders should include, but are not limited to:

- ☐ **Administrators of other ESSA Programs**—Plans for the use of Title I, Part A funds should be coordinated with other federal, state, and local resources to ensure that all resources are utilized in the most effective manner (e.g., local homeless liaisons, migrant programs, programs for neglected or delinquent youth, programs for ELs, preschool programs, etc.).
- ☐ **School Leadership Teams**—Principals and teachers should be included in decisions regarding the use of individual school allotments, as well as LEA reservations.

- **Parents and Families**—LEAs must engage parents in the development of LEA and school planning for the use of Title I, Part A funds including the development of Consolidated Grant Application's Title I, Part A section and PFE policies and plans.
- **Private School Officials**—LEAs must consult with private school officials during the development of the Title I, Part A plan to inform private schools of ways that federal funds can provide equitable services to students attending private schools.
- **Tribal Officials**—LEAs with (1) an American Indian/Alaska Native student enrollment of 50% or more of the total LEA enrollment, or (2) that received a Title VI, Part A grant that exceeded \$40,000 in the previous year are required to consult with appropriate officials from Indian tribes or tribal organizations prior to the LEA's submission of a required plan or application.

Identifying and Skipping Schools in Ranking and Allocation

To ensure compliance with federal requirements and consistent statewide implementation, LEAs must follow specific criteria when determining which entities qualify as “schools” for the purpose of Title I, Part A ranking and allocation. In limited circumstances, LEAs may also elect not to serve a school (commonly referred to as “skipping”) if certain conditions are met. The following guidance outlines eligibility, skipping criteria, and required documentation.

Identifying a “School” for Title I, Part A Ranking and Allocation

Ranking and allocating requirements apply to entities that meet **all** the following criteria. The entity:

1. Is a school residing within an eligible LEA's boundaries,
2. Has a building code assigned through OSPI's school directory process,
3. Provides public education to students (not a private or for-profit entity), and
4. Includes at least one grade level from kindergarten to grade 12.

OSPI uses directory data to identify schools that meet the above criteria. These schools are prepopulated in the Title I, Part A Ranking and Allocation form.

Note: Entities that do not meet all criteria may still receive Title I, Part A support through the district set-aside, if other requirements are met.

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

The LEA may elect not to serve a school in rank order if the following **three conditions are met**:

1. **Comparability**

The school must meet Title I, Part A comparability requirements under ESEA Section 1118(c).

2. **Supplemental Funding**

The school must receive comparable supplemental funds from other state or local sources that meet the intent and purpose of Title I, Part A. *In Washington, this is LAP funding, including High Poverty LAP.*

3. **Equity of Funds**

The funds expended from these sources must be **equal to or greater than** the amount the school would have received under Title I, Part A.

If these conditions are not met, the school may not be skipped and must receive Title I, Part A services in rank order.

What to Include in the CGA When Skipping a School

When skipping a school in the Ranking and Allocation section of the EGMS Consolidated Grant Application, LEAs must add a comment for each skipped school that includes:

- The amount of LAP funding the school will receive, which must equal or exceed the amount it would have received under Title I, Part A.
- An assurance that the school will meet Title I, Part A comparability requirements and will be included as a Title I, Part A school in the Comparability Report.

Example to Include in the CGA Comment Section:

"School will receive \$____ in LAP (equal/exceeds Title IA) allocation and will meet comparability as a Title IA school."

If you have any questions, please contact Title1a@k12.wa.us.

Allowable Title I, Part A Categories and Staff Positions and Their Definitions

Administrators (Non-clerical): Persons whose primary assignment is to direct staff members or manage programs and support Title I, Part A services within a school. This category includes project directors, program managers, or coordinators. (2080-hour base)

Teachers: Certificated staff that provide supplemental instruction or interventions to Title I, Part A-served students. (1080-hour base). See [Staffing Requirements/Qualifications Paras & Teachers](#).

Paraprofessionals: Classified staff who assist certificated staff with instructional activities for Title I, Part A-served students. See [Staffing Requirements/Qualifications Paras & Teachers](#).

Counselors/Support Specialists: Persons who provide guidance, counseling, or related supporting services. Staff who conduct student evaluations are also included in this classification. If a support staff person works on a 2080-hour base, include them as a unique listing in the "other" category. (1080-hour base)

Consultant Teachers/Coaches: Staff members with expertise in a specialized field who provide academic support and PD to other staff members of Title I, Part A-served students for supplemental instruction/interventions. Includes curriculum consultants and supervisors. (1080-hour base)

Clerical Support Staff: Employees who handle preparing, transferring, transcribing, systematizing, or filing written communications, records, and transactions for Title I, Part A, including clerks and secretaries. (2080-hour base).

FEDERAL GUIDANCE RESOURCES

Laws, Non-Regulatory Guidance, and other resources from ED with connections to Title I, Part A program requirements:

Name	Year
The full text of ESEA , as amended by ESSA	2015
ESSA Schoolwide Guidance/Title I, Part A	September 2016
Title III Guidance	September 2016
Early Learning Guidance	October 2016
Student Supports and Academic Enrichment Grants	October 2016
Ensuring Educational Stability for Children in Foster Care	June 2016
Homeless Student Guidance	July 27, 2016
Dear Colleague Letter on Tribal Consultation	September 26, 2016
Fiscal Changes & Equitable Services Guidance	October 7, 2019
Using Evidence to Strengthen Education Investments	September 16, 2016
Within-District Allocations Under Title I, Part A	February 2022
Q&A on Food, Meetings and Conference with Federal Funds	August 2024

GLOSSARY

Item	Description
Allocation	An allocation is the amount of state or federal funds allocated by the state to the LEA to spend on a particular grant or specific use of funds.
Budget	The budget provides details on how the LEA or school will spend its allocation. The budget is also a necessary part of the federal fund processing and is transmitted via the EGMS system for the federal claim process.
Budget Redirection	A type of amendment request in which modifications are made to the LEA's budget within an approved grant.
Child	The term "child" means any individual aged 3 to 21 years of age.
Community Based Organization	The term "community-based organization" means a private nonprofit organization of demonstrated effectiveness, Indian tribe, or tribally sanctioned educational authority, that is representative of a community or significant segments of a community and that provides educational or related services to individuals in the community. Such term includes a Native Hawaiian or Native American Pacific Islander native language educational organization.
CEP	Community Eligibility Provision is a non-pricing meal service option for schools and LEAs in low-income areas. CEP allows the nation's highest poverty schools and LEAs to serve breakfast and lunch at no cost to all enrolled students without collecting household applications.
CEDARS	The Comprehensive Education Data and Research System is a longitudinal data warehouse of educational data. LEAs report data on courses, students, and teachers. Course data includes standardized state course codes. Student data includes demographics, enrollment information, schedules, grades, and program participation. Teacher data includes demographics, certifications, and schedules.
ESEA	The federal Elementary and Secondary Education Act, enacted in 1965, is the nation's education law and shows a longstanding commitment to equal opportunity for all students.
ESSA	Every Student Succeeds Act replaced No Child Left Behind (NCLB) on December 10, 2015, with the reauthorization of ESEA.
Federal Funds	Those funding sources come from the federal government, with each grant as a separate funding source. Transactions for these funds are always posted to the current fiscal year, as the federal

Item	Description
	funds have no prior year reporting.
FTE	A Full Time Equivalent is the hours worked by one employee on a full-time basis. The concept is used to convert the hours worked by several part-time employees into the hours worked by full-time employees. On an annual basis, an FTE is 2,080 hours, which is calculated as 8 hours per day.
FY	The Fiscal Year is the period between July 1 and June 30 of any given year.
PPE	Per Pupil Expenditure of funds determines the amount of funds generated by a school based on the number of low-income children. The minimum PPE calculated on the Set-Asides page is based on the TOTAL number of low-income students in the LEA, not just of those low-income students in the schools served.
Set-Asides	Reservations of funds earmarked for specific services and programs that serve at-risk youth. Some examples include <i>local institutions for neglected children; homeless children in non-participating Title I, Part A schools; local institutions for delinquent children; community day programs for neglected and delinquent children; family and community involvement</i> (if total allotment is \$500,000 or more); <i>financial incentives; Early Education; LEA administration; LEA-wide initiatives; and PD.</i>
SIS	Student Information System is a web-based application software designed to introduce a conducive and structured information exchange environment for integrating students, parents, teachers and the administration of a school or college.
Stakeholder	In education, the term stakeholder typically refers to anyone who is invested in the welfare and success of a school and its students, including administrators, teachers, staff members, students, parents, families, community members, local business leaders, and elected officials such as school board members, city councilors, and state representatives. Stakeholders have a "stake" in the school and its students, meaning that they have personal, professional, civic, or financial interest or concern.

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