

American Recovery & Reinvestment Act (ARRA) - Title I Frequently Asked Questions (FAQ)

The U.S. Department of Education (ED) has issued guidance on funding of Title I, Part A programs under ARRA: <http://www.ed.gov/policy/gen/leg/recovery/guidance/title-i.pdf>. The guidance addresses most of the questions that arise when planning for the use of these funds. Below are additional questions and answers based on more specific issues that have been raised by Massachusetts districts in the planning and application process.

Q: Can ARRA and/or regular Title I funds be used to take the place of previously existing Reading First grants?

A: Yes. Reading First grants are federal grants. The “supplement, not supplant” provision prohibits use of federal funds to replace state/local funds, not federally funded activities.

Q: Who can participate in professional development that is funded out of ARRA Title I funds and is directed toward improving the achievement of the lowest achieving students?

A: In a Targeted Assistance program, participants are limited to teachers who have Title I students in their classrooms. In Schoolwide programs, all teachers may participate since Title I serves all students in Schoolwide programs.

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Q: Can ARRA Title I funds be used to train teachers of students who are English language learners?

A: Title I funds can be used only if the training is in addition to the training that is already required to meet state obligations. Also, in general, Title I funds can only be used to support professional development for teachers of Title I-served students.

Q: Must the regularly required district reservations, such as the 20 percent requirement for school choice/supplemental education services or the 5 percent requirement to help all core academic teachers reach highly qualified status, be included in ARRA grant applications?

A: Yes. Any and all reservations that an applicant is required to make for regular Title I applications must also be made for ARRA applications.

Q: I heard that a waiver might be available so we won't have to make reservations in ARRA Title I applications to pay for school choice and SES, when applicable, due to accountability status – is this true?

A: Possibly. As of mid-June, we have not heard specific details from the U.S. Department of Education regarding this waiver possibility. Until a waiver is offered, where required, all reservations will have to be made. The same reservation percentages apply to ARRA funds as to regular Title I grants. If waivers become available, we will notify all Title I directors.

Q: Under the “Recovery” category, can we use ARRA Title I monies to help defray the rising costs of our current programs?

A: Yes. ARRA Title I funds may be used to maintain or expand existing programs. Since such uses would incur continuing costs beyond the ARRA grant period, they should be classified as “recovery” activities as opposed to “investments.”

Q: Can funding be rolled over from one year to the next (i.e., do carryover provisions apply to ARRA funds)?

A: For FY10, yes. Regular Title I carryover provisions apply to ARRA funds, though the details of how and when to establish carryover amounts and how to carry this out have not been finalized yet. Districts should not expect to be able to carry over any ARRA funds beyond August 31, 2011 (the end of the two-year ARRA grant fund availability period).

Q: Can funding be used for foreign language training for teachers so they can communicate with English language learner students and families?

A: While the priority for use of Title I funds is to provide supplemental academic assistance to students who are furthest from meeting grade-level standards, funds may be used to better enable parents to be actively involved in their children's educational achievement.

Q: Can funds be used to pay for expenses related to fiscal audits (A-133...)?

A: Yes – to the extent that expenses are related to audit of Title I activities.

Q: What limitations are there on using Title I funds to pay for the translation of documents?

A: Title I funds may be used to meet translation needs associated with Title I parent involvement requirements. In Targeted Assistance programs, then, translations would be limited to communication unique to parents of students who are participating in the Title I program.

Q: Are there limitations on the use of funds to send staff to conferences (in- and out-of-state)?

A: As with regular Title I funds, travel expenses should be limited to a maximum of 5% of the grant total, whether travel is in-state or out-of-state or both.

Q: Can one source of student-level data be used on the ARRA Form 1 to determine poverty percentages and a different source used for the regular Title I Form 1? How about different qualifying methods to qualify schools?

A: No. The same source and time of enrollment/attendance area and low-income data and the same qualifying method to determine eligible schools must be used for both the ARRA and regular Title I Forms 1 for the purpose of determining poverty percentages and eligibility of schools/school attendance areas.

Q: Do we need to serve the same grade spans for our ARRA and regular FY10 Title I grant? For example, can Title I serve elementary and middle schools, but ARRA serve only elementary?

A: Possibly. While different methods of qualifying schools may not be used on the different Title I forms, when using the grade-span option, one grade span may be chosen to be served first on the ARRA funding Form 1, while another grade span may be chosen to be served first on the regular FY10 Form 1.

Q: Can we provide Title I services in a school that wasn't served before?

A: Possibly. Since districts apply for ARRA funds and regular Title I funds separately, using different allocation schemes and/or school qualifying methods on the separate Forms 1 are allowable and may result in serving an eligible school that has not been served before.

Q: Would it be possible for districts to submit one Form 1 and one Form 2 that includes both ARRA funds and regular FY10 Title I funds?

A: Yes. While the use of ARRA funds must be tracked separately from regular Title I funds, if you apply for both types of funds at the same time (with separate budgets), and using one Form 1 and 2 for the total amount of funding allows you to better serve the populations that you desire, then you may choose to submit just one Form 1 and 2 that covers the total of both funding sources.

Q: Do private schools also have to fill out all of the responses to questions that we are required to complete for each project on the ARRA application?

A: Yes, though you, the applicant, fill out the application rather than private school participants. All initiatives funded with ARRA funds must be explained by answering the application questions. The regular requirement to serve eligible and participating private schools is no different with ARRA funds.

Q: If we have already contacted private schools and no one wants to participate, do we have to contact them again about ARRA funds?

A: Possibly. Just as with regular Title I funding, eligible students in private schools must be afforded the opportunity to participate. If the offer has been made for participation in FY10 activities, then additional contact is not needed. If you plan to use funds for summer activities that were not planned when you initially contacted eligible private schools, then additional contact is appropriate to afford them the opportunity to participate.

Q: Can we replace a literacy specialist in a Title I school who has been paid out of local funds, but is being cut out of the budget?

A: It depends. Please see the question and answer for C-9 on page 28 of federal guidance on the use of ARRA Title I funds, accessible via: <http://www.ed.gov/policy/gen/leg/recovery/guidance/title-i.pdf>.