

REQUIREMENTS

Neglected and Delinquent

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Homeless

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Summary of Obligation of Funding for Neglected and Delinquent (N&D) Children

Title I Law

Under the Title I, Part A regulations, requirements exist for Local Education Agencies (LEAs) to assist neglected and delinquent children within their district boundaries.

It is specifically cited in Title I, Part A regulations (Sec. 1113, c, 3 – Reservation) that:

“A LEA shall reserve such funds as are necessary under this subpart to provide services comparable to those provided to children in schools funded under this part to serve: children in local institutions for neglected children and if appropriate, children in local institutions for delinquent children, and neglected or delinquent children in community day school programs.”

Funding Scenarios

There are different scenarios that LEAs may encounter:

- A. LEAs with local delinquent facilities generate funding that is placed into a funding reserve in which LEAs with delinquent facilities must apply for a grant on a competitive basis using a formal application process. LEAs with local delinquent facilities are not required to reserve a set aside of their Title I funding.
- B. LEAs with local neglected facilities that have an aggregate unit of 10.0 or greater will automatically generate a separate Title I N&D allocation. This amount, along with funding generated from other federal programs, must be applied for through a formal application process.
- C. LEAs with local neglected facilities that have aggregate units less than 10.0 do not generate a separate Title I N&D allocation. These LEAs must set aside a portion of their Title I funds to serve neglected students.

For those required to reserve set aside funds, the state Title I office has established a minimal formula amount to ensure fair and equitable distribution of funding to meet the federal compliance requirements. The formula used is \$1,000 per aggregate unit. The state Title I office provides each district with a chart listing their aggregate units.

Action Needed as Part of the Targeting/Consolidated Application Process for Option C

The check sheet below provides a brief overview of this process:

- STEP ONE: Determine your required reservation of set aside funding for neglected youth. (Aggregate unit x \$1,000)
- STEP TWO: List the amount of set aside funding for neglected students in section four of the targeting report.
- STEP THREE: Determine the allowable services to be provided for neglected students.
- STEP FOUR: Input information into the Consolidated Application for Federal Title Funding on the STARS. This includes information in the 'Activities' and 'N&D Addendum' sections.

North Dakota Guidance for Neglected and Delinquent Programs

The state Title I office would also like to make you aware of N&D guidance for districts on the Title I, N&D and Part A reservation set aside funding. The document entitled “*Guidance on the Obligation of Federal Title Funding for Neglected and Delinquent Children*” is available on the Title I, Neglected and Delinquent (N&D) website at www.dpi.state.nd.us/title1/neglect/guidance.shtm. Here you will find more information on specific N&D requirements.

Questions

For questions on the set-aside regulations, you may contact Jacki Harasym at jharasym@nd.gov or (701) 857-7770 or Laurie Matzke at lmatzke@nd.gov or (701) 328-2284.

**Guidance on the Obligation of Federal Title I Part A
Funding for
Children Experiencing Homelessness**

Title I Law

All districts reporting homeless children and youth on the STARS will be required to set aside Title I funds to assist children and youth experiencing homelessness within district boundaries.

The law specifically addresses homelessness and the LEA's requirement in the following Title I, Part A regulations (Sec. 1113, c, 3 – Reservation):

“A local education agency shall reserve such funds as are necessary under this part to provide services comparable to those provided to children in schools funded under this part to serve

(A) homeless children who do not attend participating schools, including providing educationally related support services to children in shelters and other locations where children may live.”

Explanation of McKinney-Vento Funding under the No Child Left Behind Act

McKinney-Vento funding is also available to school districts through a competitive grant. Additional information on this competitive grant process can be accessed at www.dpi.state.nd.us/title1/homeless/grant/index.shtm on the department website.

Definition of Homelessness

Children eligible to benefit from the Title I homeless set-aside amount would include those children in situations that meet one of the following definitions:

1. **Shelters** – includes children and youth living in emergency shelters, transitional living programs, and children and youth awaiting foster care placement.
2. **Doubled-up** – sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason. This category includes children, youth, and unaccompanied youth who live with relatives, friends, boyfriends, girlfriends, etc., because they can not afford housing on their own.
3. **Hotels/Motels** – children, youth, and unaccompanied youth who are temporarily living in hotels and motels because they can not afford permanent housing.
4. **Unsheltered** – children and youth or unaccompanied youth who live in abandoned buildings or apartments, bus and train stations, airports, campgrounds, cars, parks, public spaces, dilapidated trailer parks, children abandoned in hospitals, and children and youth who live in substandard or inadequate housing.

Use of Funds

Title I, Part A funds set aside for homeless students can be used for any of the following:

1. To improve educational services for homeless children and youth by assisting children and youth in meeting social and academic challenges.
2. To provide homeless children and youth with the services needed to make a successful transition from their state of homelessness to school or employment.

3. To prevent homeless youth from dropping out of school, and to provide dropouts and children and youth with a support system to ensure their continuing education.
- * A more detailed breakdown of the allowable uses of Title I funds for assisting children and youth experiencing homelessness can be accessed at www.dpi.state.nd.us/title1/targeted/general/facts/setaside.pdf on the Title I Fast Facts entitled “Issue: Using your Title I Homeless Set Aside Funds.” Additional information on serving children and youth experiencing homelessness can be accessed at www.dpi.state.nd.us/title1/targeted/general/facts/homeless.pdf on the Title I Fast Facts entitled “Issue: Serving Homeless Children and Youth – the McKinney-Vento Act.”

Calculating Reservation of Set-Aside Funds

The NCLB Act states that a reservation of funds must take place as necessary to provide services to homeless children and youth and that these services must be comparable to the services the district provides to other students. The law does not specify a percent that must be used to determine the set-aside; however, reservation of funds must be reasonable and necessary and **must be determined on a calculated basis**. The following summarizes five options for districts to use to determine their set-aside amount.

1. Obtain a count of the number of children and youth experiencing homelessness as reported on the STARS and multiply this number by the Title I, Part A per-pupil amount on your targeting spreadsheet.
 2. Obtain a count of the number of children and youth experiencing homelessness as reported on the STARS and multiply this number by a minimum of \$500.00 per pupil identified.
 3. Reserve an amount of funds to support the McKinney-Vento grant request awarded to the facility (i.e., provide a supplemental amount of Title I, Part A funds to the homeless amount awarded).
 4. Reserve a specific percentage based on the district’s Title I, Part A allocation (i.e., a district may set aside between one and five percent of its total allocation).
 5. Identify the needs of homeless children and youth and then fund accordingly by determining a figure of how much it costs to pay for services to homeless children and youth (i.e., supplemental education services, materials and supplies for those services, costs associated with successful transition, etc.).
- * If no homeless children or youth were reported on the STARS for the 2011-2012 school year it is not mandatory that you set-aside Title I funds for homeless children. However, if at any time during the 2012-2013 school year a homeless child resides in the district, you are required by law to assist this child through the use of Title I funds and/or other district funding to provide services that are comparable to those provided to other children of the district to ensure the academic and social success of the child. A budget revision may be necessary to meet this requirement.

Reserving Set-Aside Funds

1. LEAs identifying homeless children and youth in their attendance area participate by setting aside funding of the top of their Title I allocation using one of the methods described above.
2. All districts obligating funds for homeless children and youth must thoroughly explain the use of funds and their intentions on the consolidated application. Under the ‘Activities’ section, ‘Title I District Admin’ set aside funding must be accounted for with an obligated activity or activities. For example, if you choose to spend additional funding for transitional services for homeless children and youth, then you will choose the appropriate activity from the list and obligate the estimated set-

aside under the appropriate object code. Be sure to thoroughly explain your district's intentions in the explanation section.

Consolidated Application - Windows Internet Explorer
 https://secure.apps.state.nd.us/dpi/stars/Reports/ConsolidatedApplication/Activities.aspx?rid=39&ecid=705&syid=18&raid=14
 Consolidated Application
 Public LEA: DPI DISTRICT
 Year: 2007-2008

Welcome Title Admin

Consolidated Application

Title Programs
 This subsection collects the integrated activities that will be undertaken for each title program that the district will be participating in.

Title Program	Activity Total
Title I District Admin	\$428.00
Title I 5% Teacher Quality	\$0.00
Title I Targeted	\$15,250.00
Title I Schoolwide	\$7,150.00
Title I Nonpublic	\$0.00
Title I Cooperatives	\$0.00
Title I PI Choice/Supp_Ser	\$1,500.00
Title I Corr Act/Alt_Gov	\$3,900.00
Title I PI Prof. Dev.	\$3,500.00
Title I Total	\$31,728.00
Title II Part A	\$0.00
Title II Part D	\$0.00
Title III Part A	\$0.00
Title IV Part A	\$0.00
Title V Part A	\$0.00
REAP Title I Part A	\$2,000.00
REAP Title II Part A	\$0.00
REAP Title II Part D	\$0.00
REAP Title III	\$0.00
REAP Title IV Part A	\$0.00
REAP Title IV Part B	\$0.00
REAP Title V Part A	\$0.00

- The LEA must also complete the Homeless addendum section of the consolidated application. In the first section entitled "Description of services to homeless children and youth," include the method of calculating the homeless set-aside amount. The district should note the total amount of funding set-aside for the number of children and youth reported as homeless within the district and indicate how this set-aside funding was determined. In a second paragraph, the district must also specify how the district is assisting homeless children and youth with additional services, either through the use of these funds or through other programs within the district. If staff is being hired to assist children and youth at the local level, this information must also be entered under "Title I Homeless Staff."

Consolidated Application - Windows Internet Explorer
 https://secure.apps.state.nd.us/dpi/stars/Reports/ConsolidatedApplication/Activities.aspx?rid=39&ecid=705&syid=18&raid=14
 Consolidated Application
 Public LEA: Bell 10
 Year: 2007-2008

Welcome Title Admin

Consolidated Application

Title I ELL/LEP / Title I Homeless / Title I N and D
[Title I ELL/LEP](#) | [Title I Homeless](#) | [Title I Neglected and Delinquent](#)

This subsection is used to describe services under Title I Part A setaside funds for assisting homeless children within the district.

Description of services to homeless students. Include the method of calculating the Homeless setaside amount.

Title I Homeless Staff

Name	Email	FTE	Description of Position
No homeless staff found.			

Your assigned Title I staff member will be cross-checking the obligation of the funds generated for the homeless when reviewing the consolidated application.

Questions

For questions on the set-aside regulations, you may contact Jacki Harasym at jharasym@nd.gov or (701) 857-7770 or Laurie Matzke at lmatzke@nd.gov or (701) 328-2284. Additional resources on assisting children and youth experiencing homelessness can be accessed at www.dpi.state.nd.us/title1/homeless/resources/index.shtm on the Department of Public Instruction website.

Department of Public Instruction
Dr. Wayne G. Sanstead, State Superintendent
600 East Boulevard Avenue, Dept. 201, Bismarck, ND 58505-0440

PRIVATE SCHOOL REPORTING

Private School Reporting

1. To begin the targeting process each year, school districts must send *Worksheet G -Private School Target Area Selection Data* to all private schools within the district that indicated they wish to receive Title I services to complete and return. This should be done immediately as school districts cannot proceed to the next step until this worksheet is complete.
 - ✓ School districts need to decide which month they will use to report free and reduced data. The law allows districts to select any month during the current school year that would be most advantageous; however, districts must use the same month consistently to report the free and reduced data for all buildings. Indicate on the worksheet which month is being used for reporting purposes.
 - ✓ School districts need to pre-populate the first two columns before sending the worksheet to each private school.
2. In prior years, before the targeting process was completed electronically, we did not list the private school buildings on our targeting spreadsheet. Districts reported private school numbers by indicating how many were present within each attendance area. Only private school free and reduced students in an eligible attendance area generate funds for private school services. In the past, it was clear to our office which private school numbers to use in generating your spreadsheet.
3. On the STARS districts are given a choice between listing each private school separately, along with enrollment and free and reduced numbers (Option 1), or listing private school students within each public school attendance area as in the past (Option 2). Many districts choose to list each private school building separately (Option 1) as including them in the public school attendance tends to skew the public school poverty percentage. However, choosing this option can result in inflating private school allocations because they include all private schools' free and reduced numbers, not just those from eligible attendance areas.
4. For the 2011-2012 targeting process, districts will again be able to choose their method of reporting private school students on the STARS. However, all districts will be required to submit *Worksheet G* to the Title I office. The completed worksheet can be faxed to Patty Carmichael in the Title I office at (701) 328-0203.
5. Regardless of which method districts choose to use, all districts must use *Worksheet G* to collect poverty information from each private school so that documentation exists to support the numbers reported to the department for auditing purposes.

Title I Equitable Set Aside for Private School

Section 200.64(a)(2)(i)(A) of the Title I regulations requires that, if an LEA reserves funds for instructional and related activities for public elementary or secondary school students at the district level, the LEA must also provide from these funds, as applicable, equitable services to eligible private school children. The amount of funds available to provide equitable services from the applicable reserved funds must be proportional to the number of private school children from low-income families residing in participating public school attendance areas.

The following instructional services are included in the equitable services provision of off-the-top costs:

- Set aside for teacher quality
- Professional development (excluding requirements for program improvement)
- Parental involvement
- Instructional Programs (Preschool, Jumpstart, Summer School)

The following worksheets and sample worksheets are available to assist districts in planning for equitable set asides.

The STARS Consolidated Application also has a section that requests this information. Once completed, district will be required to build the financial amounts into the private school building budget.

Guidance can be found online at
www.dpi.state.nd.us/title1/nonpublic/fast_fact/equitable.pdf.

SAMPLE

Title I Equitable Services for Private School Students

1. Instructional Program(s) Reservation – Districtwide
 - Summer School Program \$40,000
 - Jump Start into Kindergarten Program \$10,000
 - Districtwide Instructional Coaches \$10,000

2. Parental Involvement Reservation
 - Parental Involvement \$50,000

3. Professional Development Reservation
 - Districtwide Curriculum Mapping \$30,000
 - Districtwide Literacy Training \$40,000
 - Attendance at Title I Summer Symposium \$10,000

4. Set aside for Teacher Quality
 - Reserve to help ELL teachers obtain endorsement \$20,000
 - Reserve to help paraprofessionals become highly qualified \$40,000

District _____

**Worksheet
Title I Equitable Services**

1. Instructional Program(s) Reservation (i.e. summer school)

In **participating** public school attendance areas:

# of Private School Low Income Children		# District Low Income Children		Proportion of Reservation
16		2,042	÷	= .0078
<hr/>				
Proportion of Reservation		Total District Reservation		Equitable Set-Aside Amount
.0078	x	\$60,000	=	\$468.00
<hr/>				

2. Parental Involvement Reservation

In **participating** public school attendance areas:

# of Private School Low Income Children		# District Low Income Children		Proportion of Reservation
16		2,042	÷	= .0078
<hr/>				
Proportion of Reservation		Total District Reservation		Equitable Set-Aside Amount
.0078	X	\$50,000	=	\$390.00
<hr/>				

3. Professional Development Reservation
(Excluding Professional Development requirements for program improvement)

In **participating** public school attendance areas:

# of Private School Low Income Children		# District Low Income Children		Proportion of Reservation
16		2,042	÷	= .0078
<hr/>				
Proportion of Reservation		Total District Reservation		Equitable Set-Aside Amount
.0078	x	\$80,000	=	\$624.00
<hr/>				

4. Set-Aside for Teacher Quality (i.e. professional development at private school)

In **participating** public school attendance areas:

# of Private School Low Income Children		# District Low Income Children		Proportion of Reservation
16		2,042	÷	= .0078
<hr/>				
Proportion of Reservation		Total District Reservation		Equitable Set-Aside Amount
.0078	x	\$60,000	=	\$468.00
<hr/>				

* This form may need to be revised throughout the school year as public schools record reallocated, REAP, transfer, or budget revisions. Any of the above district activity must provide the private school with an equitable share.

North Dakota Department of Public Instruction

TITLE I FAST FACT SERIES

Private School Programs

Issue: Providing Equitable Set Asides to Title I Private School Programs

Overview

If a district reserves Title I funds for one or more of the following activities, an equitable proportion of funds must be used to provide services to private school teachers, families and students:

- Professional development
- Parental involvement
- Instructional activities and programs
- Teacher quality

The services that will be provided with these funds must be determined in consultation with private school officials.

Some district level reservations do not apply to the equitable services requirement. These include: costs to administer the Title I program; funding for programs for homeless, neglected, and delinquent children; and costs for school and district program improvement activities.

Proportionate Calculation

District officials determine the amount of the equitable set aside based on the funds reserved in proportion to the number of private school students from low-income families residing in participating Title I attendance areas.

Examples

Category	Expenditures that generate equitable services	How the equitable set aside can be used
Professional Development	<ul style="list-style-type: none"> • District level instructional coaches • District level professional development activities • District level funds set aside for conferences, meetings, or professional development events 	<ul style="list-style-type: none"> • Not for Title I teachers, but for the regular classroom teachers of private school children receiving Title I services • Professional development designed to help classroom teachers meet the needs of at-risk students • Not for general professional development needs of the private school
Parental Involvement	<ul style="list-style-type: none"> • 1% requirement for those districts with allocations over \$500,000 • Districtwide parent coordinator • Districtwide parental involvement projects 	<ul style="list-style-type: none"> • Parental involvement activities that benefit the parents of private school Title I participants • Activities for parents to support private school Title I student learning
Instructional Activities and Programs	<ul style="list-style-type: none"> • Summer school • Before/after school programming • Jumpstart programs • Districtwide instructional programs or curriculum 	<ul style="list-style-type: none"> • Increase of instruction to students (i.e., increased teacher time, additional programming) • Summer school • Before/after school programming
Teacher Quality	<ul style="list-style-type: none"> • District reservations assisting teachers to become highly qualified • District reservations to assist paraprofessionals to become highly qualified 	<ul style="list-style-type: none"> • Not for Title I teachers, but for the regular classroom teachers of private school children receiving Title I services • Professional development designed to help classroom teachers meet the needs of at-risk students • Not for general professional development needs of the private school

If you have questions regarding this issue, please contact:

Department of Public Instruction
 State Title I Office
 600 E. Boulevard Ave., Dept. 201
 Bismarck, ND 58505-0440

Telephone: (888) 605-1951
 Fax: (701) 328-0203
 Website: www.dpi.state.nd.us/title1/index.shtm