

New Federal Program Director Training

Louisiana Department of Education,
Office of Federal Support



August 31, 2026 Claiborne Building, Baton Rouge, LA

Agenda

8:45 a.m.

9:00 a.m.

9:15 a.m.

10:00 a.m.

10:30 a.m.

10:45 a.m.

11:30 a.m.

12:30 p.m.

1:00 p.m.

2:00 p.m.

2:15 p.m.

3:00 p.m.

3:30 p.m.

Registration

Welcome

Title I, Part A

Homeless - McKinney-Vento
Break

Equitable Services

Lunch (on your own)

Supporting English Learners

Title II, Title I, Neglected &
Delinquent, Title V

Break

Title IV

Questions

Adjournment



Federal Programs Director Role



Key Areas of Responsibility

Compliance and Reporting: Ensuring all programs adhere strictly to federal and state guidelines, laws, and regulations (e.g., specific Title programs in education like Title I, II, III, etc., or other federal initiatives). This involves preparing and submitting detailed reports to relevant federal and state agencies. This also involves monitoring of federal programs through on-site reviews and desk reviews and the submission of supporting documentation to assess compliance with federal laws and regulations.

Program Management: Overseeing the entire program lifecycle from conception and development to implementation and evaluation. This includes setting program goals. Establishing timelines, and ensuring the program aligns with the organization's mission and strategic objectives.

Fiscal Management: Developing, monitoring, and administering program budgets to ensure funds are used prudently, cost-effectively, and in compliance with fiscal requirements. This often involves grant management, including the application process and expenditure tracking, and the completing and submitting of Periodic Expense Reports (PERs) and Reimbursement Requests (RRs).

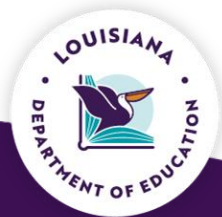
Leadership and Supervision: Hiring, training, supervising, and evaluating program staff (e.g., coordinators, specialists, aides). This person fosters a collaborative environment and provides professional development opportunities for the team.



Key Areas of Responsibility Continued

Stakeholder Engagement: Acting as a liaison between the organization (e.g., school district, governmental agency, non-profit) and external partners, including community organizations, parents and government officials.

Needs Assessment and Improvement: Leading or assisting public and non-public schools with comprehensive needs assessments to identify program requirements and using evaluative findings, including data analysis, to recommend and implement program improvements.



Title I, Part A



Purpose

Title I, Part A's primary purpose is to provide financial assistance to local school districts and schools with high percentages of children from low-income families to ensure all children meet challenging state academic standards.

Core Goals

- Give all children a significant opportunity to receive a high-quality education.
- Reduce performance differences between disadvantaged students and their more advantaged peers.
- Direct federal funding and resources to schools and districts with the highest concentrations of poverty.

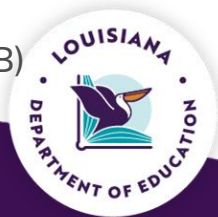


Targeted Assistance versus Schoolwide

A school district can operate one of two types of Title I programs to achieve these objectives: targeted assistance programs or schoolwide programs.

1. **Targeted assistance programs** provide services only to children identified as failing, or most at risk of failing.
2. **A Title I schoolwide program** is a comprehensive strategy designed to improve an entire educational program in a Title I schools by increasing academic achievement of the all students, particularly the most academically at-risk. A school may operate a schoolwide program if it has a poverty percentage of 40 percent or more (ESEA section 1114(a)(1)).

An SEA has discretion to grant a waiver to allow a Title I school to operate a schoolwide program without meeting the 40 percent poverty threshold if the SEA has determined that a schoolwide program will best serve the needs of students in the school who are failing, or at risk of failing, to meet the challenging State academic standards. (ESEA sections 1114(a)(1)(B) and (b)(6)).

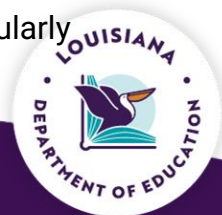


Schoolwide Plans

A Title I schoolwide plan requires a 1-year development period, a 40 percent poverty threshold (or state waiver), and a comprehensive needs assessment of the entire school.

Core Requirements

- **Poverty Threshold:** Schools must have at least 40 percent low-income students or secure a waiver from the LDOE.
- **Planning Timeline:** Plans must be developed over a 1-year period, unless the local educational agency (LEA) determines less time is needed.
- **Comprehensive Needs Assessment:** The plan must rely on an assessment analyzing student achievement data, particularly addressing the needs of struggling or at-risk students.
- **Stakeholder Involvement:** Plans require active collaboration with parents, community members, teachers, principals, and school staff.
- **Public Availability:** The completed plan must be accessible to the LEA, parents, and the public in an understandable format and language.
- **Ongoing Monitoring:** The plan stays in effect for the duration of Title I participation but must be regularly monitored and revised annually based on student data



Most asked question - is this allowable?

Understanding allowability starts with an understanding of Supplement not Supplant under Title I

Previous Title I Supplement not Supplant three tests:

Test 1: Paying for a service required by state, local, or other federal law.

Test 2: Funding a program that was paid for by state/local funds last year.

Test 3: Providing the same service to Title I students that non-Title I students get for free.

**** NOTE:** *These are still in place for other ESSA Titles*



Most asked question - is this allowable?

The ESSA Shift:

Written Methodology: Districts must maintain a documented procedure proving that Title I schools receive all the state and local funding they would get if they were non-Title I schools.

Shift from NCLB Rules: The older, rigid presumptions and individual cost-matching tests from No Child Left Behind no longer dictate compliance.

Exemptions: The specific methodology requirement does not apply if a grade span contains only Title I-receiving schools or no overlapping non-Title I schools.

The Exclusion Test: You still cannot use Title I to pay for things required by state law, local mandates, or OCR/IEP requirements.

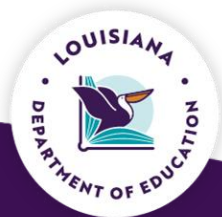


Allowability and the Schoolwide Plan

Title I Supplement, Not Supplant (SNS) rules directly shape Title I **Schoolwide Programs (SWP)** by removing rigid cost-tracking rules, allowing schools to blend funds to upgrade their entire educational program. Under a Schoolwide model, compliance is evaluated at the **school level** rather than the individual cost level

The Schoolwide Planning Connection

- **Funding Flexibility:** A schoolwide school can consolidate Title I funds with other federal, state, and local money.
- **No Individual Tracking:** Staff do not need to prove that a specific student receives a specific Title I-funded service .
- **Entire Program Upgrade:** Funds must be used to improve the overall educational quality for all students, focusing on the lowest-achieving subgroups.
- **Comprehensive Needs Assessment (CNA):** The schoolwide plan must stem from a thorough data analysis identifying specific academic gaps.



Some Scenarios

Scenario 1: The Mandated English Learner (EL) Curriculum

- **The Situation:** State law passes a mandate requiring all districts to provide a specific, specialized reading intervention curriculum for English Learners. A Title I Schoolwide campus wants to use Title I funds to purchase these newly mandated kits.
- **The Rationale:** You cannot use Title I funds to pay for services or materials that are required by state or local law. Because the state mandated it for all districts, the district must use state or local funds to provide it.
- **The Fix:** The district must buy the baseline kits with local funds. However, the school *can* use Title I funds to buy *additional* supplemental components (like advanced training for the teachers or digital extension licenses) that go beyond the state mandate.

The Verdict: SUPPLANTING



Some Scenarios

Scenario 2: The Universal Math Software

- **The Situation:** A district purchases a math software program for all schools using local funds. A Title I schoolwide principal wants to use Title I funds to buy 50 extra user licenses for their expanding student population.
- **The Rationale:** The district is already providing the baseline program to everyone using local funds. The Title I school is simply using its federal allocation to expand access or intensity to meet a higher demand identified in their Comprehensive Needs Assessment (CNA).

The Verdict: Allowed



Some Scenarios

Scenario 3: The Core Teacher Switch

- **The Situation:** A Title I school experiences a surge in 3rd-grade enrollment. The principal wants to use Title I funds to hire a new 3rd-grade teacher to keep class sizes small.
- **The Rationale:** Providing a basic classroom teacher to meet general enrollment demands is a core district responsibility. The district's *written allocation methodology* should dictate how extra teachers are handed out based on student counts, without considering Title I status.

The Verdict: SUPPLANTING.

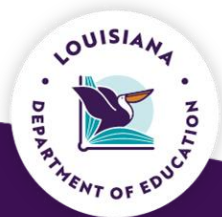
The Fix: If the district provides the baseline 3rd-grade teachers, the Title I school *can* hire a supplemental **Interventionist** or **Co-Teacher** to push into those classrooms to support struggling subgroups.



So..... Is it allowable?

Every proposed expenditure must be **allowable, allocable, reasonable, and necessary** for the operation of the Title I program. Ask these basic questions for every purchase:

- **Necessary:** Is the cost essential for achieving program objectives or raising student academic achievement?
- **Reasonable:** Does the cost reflect what a prudent person would pay under similar circumstances in the market?
- **Allocable:** Can the goods or services be assigned to the federal award in accordance with the relative benefit received?
- **Allowable:** Does it conform to federal, state, and local statutory guidelines and exclusions?



If yes to all, then ask . . .

1. Does the district distribute funds to schools in a Title I neutral manner?
2. Does the cost directly align with a need identified in the school's comprehensive needs assessment and schoolwide plan?
3. Is it for something required by the state or by OCR or an IEP.

If answer to #1 and #2 are yes, and answer to #3 is no, the cost is allowable.



Homeless-McKinney Vento Act



Purpose of McKinney Vento Act

- McKinney Homeless Assistance Act was enacted in 1987.
- Ensure that each child of a homeless individual and each homeless youth has **equal access to the same free, appropriate public education, including a public preschool education**, as provided to other children and youths.

To provide services and activities to improve the identification of homeless children and youths and enable such children and youths **to enroll in, attend, and succeed in school.**



**Stewart B
McKinney**
Republican
Representative
Connecticut



Bruce Vento
Democratic
Representative
Minnesota



McKinney-Vento Act Is an Education Law

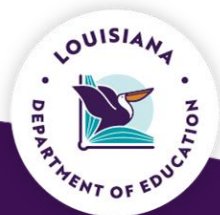
Primary Purpose

- Ensure housing instability does not block enrollment, attendance, participation, or school stability.
- Provide equal access to the same free, appropriate public education available to other students.
- Requires LEAs to identify and remove barriers.

What It Is Not

- Not a housing program
- Not a rent assistance program
- Not a custody decision
- Not a reason to delay school access

McKinney-Vento Homeless Assistance Act, Subtitle VII-B, 42
U.S.C. §§ 11431-11435



Homelessness



Definition of Homelessness

Homeless children and youths are individuals who lack a fixed, regular, and adequate nighttime residence.

Sharing housing
because of loss of
housing, economic
hardship, or a similar
reason

Motels, hotels, trailer
parks, or campgrounds
because adequate
alternatives are
unavailable

Emergency or
transitional shelters

Places not designed or
ordinarily used for
sleeping

Cars, parks, public
spaces, abandoned
buildings, substandard
housing, bus or train
stations, or similar
settings

Migratory children
living in one of these
circumstances



Fixed, Regular, and Adequate

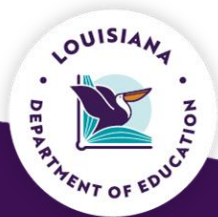
A useful starting question: Can the student return to the same place consistently and sleep in a safe and sufficient space?

Fixed and Regular

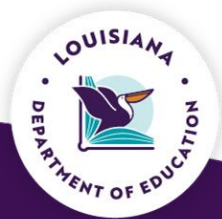
- Fixed: stable and not likely to change unexpectedly
- Regular: used consistently and predictably as the usual place to sleep
- Repeated movement may indicate the residence is not regular

Adequate

- Safe and sufficient for normal living needs
- Consider sleeping space, utilities, sanitation, hazards, and structure
- A residence may be fixed and regular but still inadequate



Identification



Identification: Louisiana Student Residency Questionnaire and McKinney-Vento referral form



Louisiana Student Residency Questionnaire

(Form Must Be Included In School Enrollment Packet)

Date: _____ LEA: _____ School Name: _____

Student Name: _____ ID#: _____ Gender: Male / Female

Address: _____ Phone: _____

Last School Attended: _____ Current Grade: _____ Date of Birth: _____

Parent/Guardian/Adult Caring for Student: _____ Relationship: _____

Disclaimer: This questionnaire is intended to address the McKinney-Vento Act. Your child may be eligible for additional educational services through Title I, Part A, Title I, Part C, Migrant Individuals with Disabilities Education Act (IDEIA) and/or Title IX, Part A, Federal McKinney-Vento Assistance Act, 42 U.S.C. 11433. Eligibility can be determined by completing this questionnaire. It is illegal to knowingly make false statements on this form. If eligible, students are to be immediately enrolled in accordance with Bulletin 747, section 341.

- ☐ YES ☐ NO Did the student receive McKinney Vento (Homeless) Services in a previous school district?
- ☐ YES ☐ NO Is the student's address a temporary living arrangement? (Note: If this is a permanent living arrangement or the family owns or rents their home, complete questions 6 & 7 and sign under item 12 and submit form to school personnel.)
- ☐ YES ☐ NO Is the temporary living arrangement due to loss of housing or economic hardship?
- ☐ YES ☐ NO Does the student have a disability or receive any special education-related services? (Check one)
- Where is the student currently living? (Check all that apply.)
 - ☐ In an emergency/transitional shelter.
 - ☐ Temporarily with another family because we cannot afford or find affordable housing.
 - ☐ With an adult that is not a parent or legal guardian, or alone without an adult.
 - ☐ In a vehicle of any kind, trailer park or campground without running water/electricity, abandoned building or substandard housing.
 - ☐ Emergency Housing (i.e. FEMA Trailer or FEMA Rental Assistance)
- ☐ YES ☐ NO Within the past 6 months, we worried whether our food would run out before we got money to buy more.
- ☐ YES ☐ NO Within the past 6 months, the food we bought just didn't last, and we didn't have money to get more.
- ☐ YES ☐ NO Does the student exhibit any behaviors that may interfere with his or her academic performance?
- Would you like assistance with uniforms, student records, school supplies, transportation, other? _____
- (Describe): _____
- ☐ YES ☐ NO Migrant - Have you moved at any time during the past three (3) years to seek temporary or seasonal work in agriculture (including Poultry processing, dairy, nursery, and timber) or fishing? _____
- ☐ YES ☐ NO Does the student have siblings (brothers or sisters)? Note: Use back of page if more space is needed.

Name _____	School _____	Grade _____	DOB _____
Name _____	School _____	Grade _____	DOB _____
- The undersigned certifies that the information provided above is accurate

Print Parent/Guardian/Adult Caring for Student's Name _____	Signature _____	Date _____
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(Area Code) Phone Number _____	Street Address _____	City _____	State _____	Zip Code _____
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Print School Contact Name _____	Title _____	Signature _____	Date _____
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Homeless Liaison Use Only - Check All that Apply:

☐ Sheltered ☐ Doubled-Up ☐ Unsheltered/FEMA/Substandard ☐ Hotel/Motel ☐ Unaccompanied Youth: ☐ YES ☐ NO

☐ Sent Resources or made contact with POC for food insecurity ☐ School Use Only:

☐ Free or Reduced Price Meals Form submitted/signed ☐ Copy Placed in Student's Cumulative Record

Revised 07/2026



Confidential Referral Form

TITLE VII, SUBPART B, MCKINNEY-VENTO Homeless Assistance Act, as Authorized by TITLE IX, PART A OF ESSA

LEA: _____ School Year: _____ Date: _____

Student Name: _____ School: _____

Parent/Guardian: _____ ID#: _____ IEP: _____ YES _____ NO

Gender (M/F/Race): _____ DOB: _____ Age: _____ Grade: _____ Phone Number: _____

Temporary Address: _____ City: _____ Zip: _____

Referring Person: _____ Position: _____

Reason for referral: Problems listed below often prevent homeless children and youths from attending school. Please check all areas of concern which apply to the student identified above.

- ☐ School of origin: Yes _____ No _____
- ☐ Student lacks a permanent residence
- ☐ Student is unable to pay school fees
- ☐ Immunizations are needed
- ☐ Birth certificate is needed
- ☐ Excessive absences are a problem
- ☐ Lacks academic records and/or documentation
- ☐ Academic problems indicate a need for tutoring
- ☐ School supplies are needed
- ☐ Transportation to school is a problem
- ☐ Student/family needs assistance accessing community resources
- ☐ Behavior indicates a need for mental health counseling
- ☐ School clothes are needed (Close: Shirt _____ Pants _____ Shoes _____ Other _____)
- ☐ Free lunch data needed
- ☐ Health problems are indicated
- ☐ Need Health Insurance (LA CHIP/Medical Card)
- ☐ Guardianship is a problem
- ☐ IDEA (gifted, talented, disabilities) services needed
- ☐ LEP/EL services needed
- ☐ Migrant services needed
- ☐ Need SNAP benefits (food stamps)
- ☐ Early childhood services or Higher Ed Services

COMMENTS: _____

Check all that apply:

- ☐ (1) Sheltered
- ☐ (2) Doubled-Up
- ☐ (3) Unsheltered/FEMA/ Substandard
- ☐ (4) Hotel/Motel

Unaccompanied Youth: Yes _____ No _____

- ☐ 01 - Mortgage Foreclosure
- ☐ 02 - Flooding
- ☐ 03 - Hurricane
- ☐ 04 - Tropical Storm
- ☐ 05 - Tornado
- ☐ 06 - Wildfire or Fire
- ☐ 07 - Man-made Disaster (Major)
- ☐ 08 - Eviction
- ☐ 09 Unemployment/ Loss of Job
- ☐ 10- Domestic Violence
- ☐ 11- Illness
- ☐ 12- Financial Hardships
- ☐ 13-Lack of Affordable Housing
- ☐ 14- Unaccompanied Youth
- ☐ 15- Incarceration of Parent/ Guardian
- ☐ 16-Unsafe Living Conditions

Other Children in Home: _____

School Personnel Signature _____	Date _____	Homeless Liaison Signature _____	Date _____
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*LIAISON'S SIGNATURE INDICATES STUDENT(S) MEETS TITLE IX, PART A REQUIREMENTS

Copy Sent to District Homeless Liaison _____ Copy Placed in Student's Cumulative Record (Revised 07/2026)

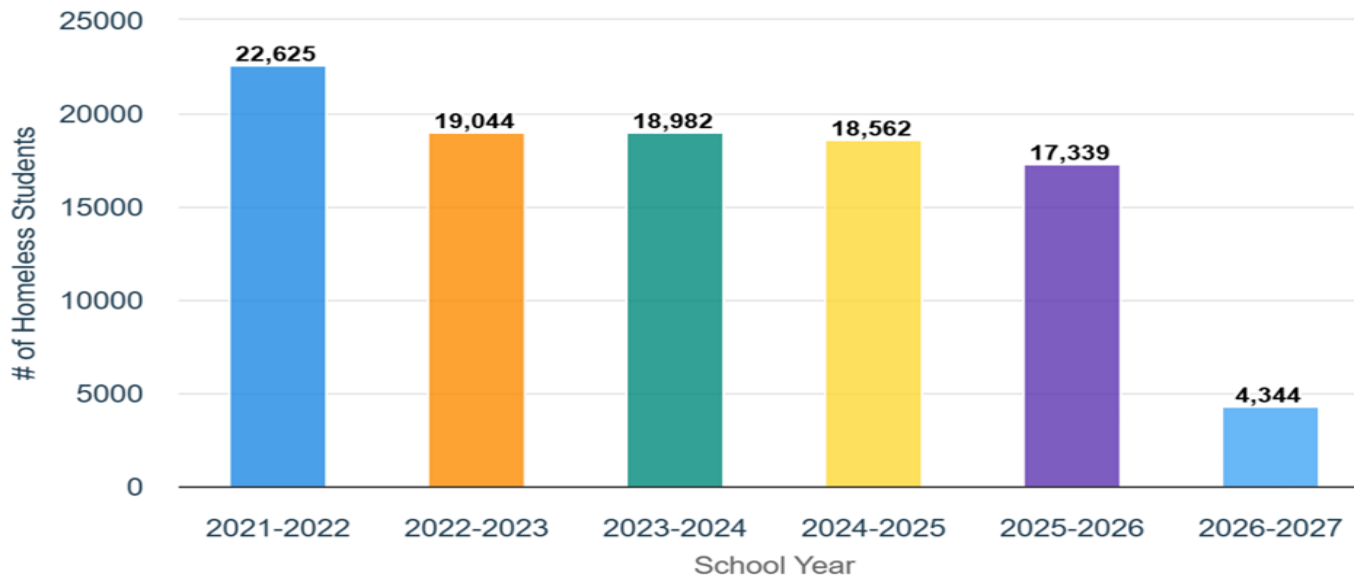


McKinney Vento Population



How has our homeless student enrollment changed from year to year?

The number of homeless students each year.

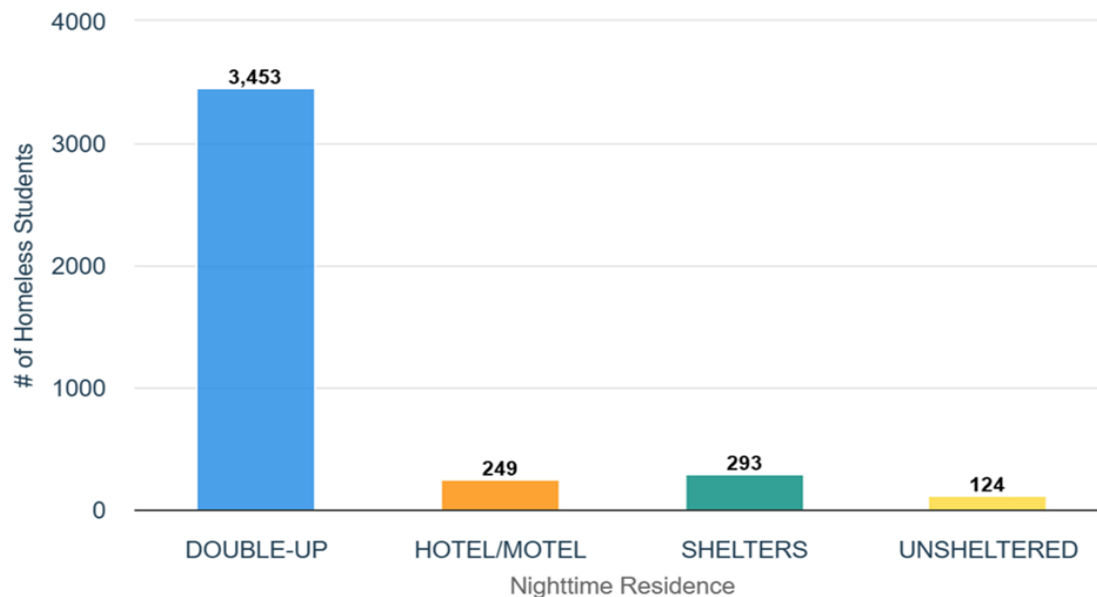


26-27 Residences as of August 21, 2026



What is the Night Time Residence of our Homeless Students?

The number of currently enrolled homeless students by nighttime residence.



Liaison Access to EdLink



To access EdLink, the liaison must have an account established through EdLink Security. Please work with your **local LEA Security Coordinator** to assist you in establishing your user credentials for EdLink.

[EdLink Security Resource Page](#)

1st: Go to [MyLa link](#). [MyLA](#)

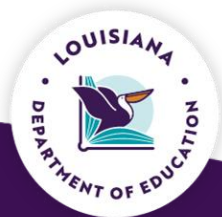
2nd: Work with your local LEA Security Coordinator to ensure your Staff ID is linked to the User Name created in step 1 above. Each staff person in public/charter schools will have a unique identifier known as a StaffID.

3rd: Go to [EdLink](#) to register. Once registered an email will be sent to your local LEA Security Coordinator for approval. Once approved, you will receive an email. If you don't receive a return email, in a timely manner, please contact your local LEA Security Coordinator and/or check your SPAM folder.



Role of the Liaison

Required duties, coordination, public notice, and staff awareness



The Liaison's Required Work

Planning Worksheet

Student and Family Access

- ☐ Identification
- ☐ Enrollment and equal opportunity
- ☐ Access to services
- ☐ Referrals
- ☐ Parent, guardian, and youth information
- ☐ Dispute support

System Capacity

- ☐ Provide public notice
- ☐ Coordinate transportation information and access
- ☐ Professional development for self and school personnel
- ☐ Support for unaccompanied youth
- ☐ Coordination and follow-up



Dispute Resolution and Written Explanations

- What Can Be Disputed under McKinney-Vento?
Eligibility, school selection, and enrollment decisions
- When a request is denied, you **must provide a written explanation.**
- Explain appeal rights and next steps.
- The liaison assists the family or youth with the dispute process.

*****Required **enrollment and access continue** while the dispute and available appeals are pending



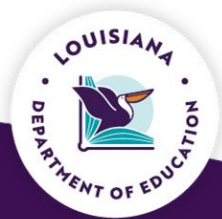
Dispute Steps

Sample Dispute Handout

- 1) **Enroll the child or youth immediately** in the school in which enrollment is sought pending resolution of the dispute, including all available appeals. While the disputes are pending, students have the right to participate fully in school activities. (Section 725(1)).
- 2) **The local liaison will make a determination.** The parent, guardian, or unaccompanied youth must be provided with a written explanation of any dispute-related decisions that involve the school or LEA including the right of the parent, guardian, or unaccompanied youth to appeal such decisions to the State (Section 722(g)(3)(E)(ii)).
- 3) Once the liaison has provided the parent with a determination, if the parent, guardian, or unaccompanied youth would like to appeal the LEA's decision, they will send a request for an appeal to the State. **The State Coordinator will then make a determination** and provide the decision in writing to the LEA and the parent which includes the rationale. The parent, guardian, or unaccompanied youth has the right to appeal such decisions through external civil litigation.
- 4) The liaison/ State Coordinator **will follow up** with the parent, guardian, or unaccompanied youth and the involved school(s) once a final dispute decision is rendered to help implement the decision. This follow-up is especially important when the decision is not what the parent, guardian, or unaccompanied youth requested. The local liaison can play a key role in helping the parent, guardian, or youth accept the decision and access available student supports, regardless of how the dispute was resolved.



Funding



Funding and Support

Primary Program Sources

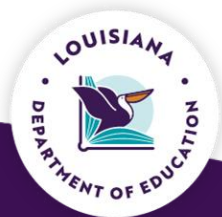
McKinney-Vento
subgrant funds

Title I, Part A
reservation

Each source has its own rules.

Other Possible Support

- General LEA funds
- Other federal or state programs
- Community partners
- Donations or private resources, when permitted



Sweet 16 Categories 1-8

Instruction, Access, and Evaluation

1. Tutoring and supplemental instruction
2. Expedited evaluations
3. Professional development
4. Health and service referrals

Stability and Engagement

5. Excess school-of-origin transportation costs
6. Early childhood programming
7. Engagement and retention activities
8. Before-school, after-school, mentoring, and summer programs



Sweet 16 Categories 9-16

Records, Parents, and Coordination

- 9. Records-related costs
- 10. Parent education and training
- 11. Coordination with agencies
- 12. Specialized instructional support

Participation and Emergency Needs

- 13. Support related to domestic violence or parental mental health/substance use
- 14. Space and supplies for non-school facilities
- 15. School supplies
- 16. Extraordinary or emergency assistance



#16. Short Term Housing (New)

Under appropriate circumstances, the U.S. Department of Education (Department) has now determined that this authority extends to the provision of short-term, temporary emergency housing.

Last resort after coordination: **EHCY funds** may only be utilized for short-term emergency housing when alternative funding sources and housing options are not readily available, such as shelter beds or hotel vouchers for which a child, youth, or family may be eligible, despite active collaboration and coordination with local housing providers, local government agencies, and non-profit organizations that support families and youth experiencing homelessness.

[Dear Colleague Letter](#)



The McKinney-Vento Law Requirements

New requirements in the Every Student Succeeds Act (ESSA) require public school districts to carefully select and **ensure capacity of the staff** they designate to serve as their McKinney-Vento (MV) Homeless Education Liaisons.

SEA State Coordinator (pg3)

(5) To develop and implement **professional development programs for liaisons** designated under subsection (g)(1)(J)(ii) and other local educational agency personnel —

(A) to improve their identification of homeless children and youths; and

(B) to heighten the awareness of the liaisons and personnel of, and their capacity to respond to, specific needs in the education of homeless children and youths.

LEA Liaison (pg16)

(A) DUTIES- Each local educational agency liaison for homeless children and youths, designated under paragraph (1)(J)(ii), shall ensure that--

(ix) **school personnel providing services under this subtitle receive professional development** and other support.

***Evidence/Documentation**



For Additional Professional Development, Resources and Webinars Visit

[National Center Homeless Education](#)

[NCHE](#)

[National Association for the Education of Homeless Children and Youth](#)

[\(NAEHCY\)](#)

[2026 NAEHCY Conference in Nashville, TN in-person or virtual October 31- November 3](#)

[Gaylord Opryland](#)

[SchoolHouse Connection](#)



Key Takeaways

- McKinney-Vento is an education law focused on access, stability, participation, and success.
- Eligibility is based on whether the student lacks a fixed, regular, and adequate nighttime residence.
- Identification is ongoing and requires private, respectful referral and review.
- Eligible students have immediate educational rights.
- The liaison coordinates the system.
- Funding decisions require need, authority, approval, and documentation.



Questions and Contact Information

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Kenneth Austin, Education Consultant
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Dr. Terri Byrd, Education Consultant
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BREAK



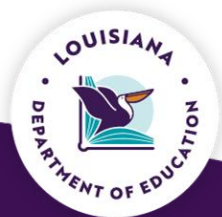
Equitable Services



Purpose and facts related to Non-public/private equitable services

- The purpose of the United States Department of Education's non-public/private school equitable services is to ensure that eligible students and educators in private schools have a fair and equivalent opportunity to benefit from federal education programs through an allocation for educational services through the ESEA Act of 1965, now amended by the ESSA Act of 2015.
- Keep in mind, federal funds are sent from the U.S. Department of Education to each states LEA/school district to provide services to two groups of students/children; public and non-public/private.
- Remember funds/money/services follow the children/students.

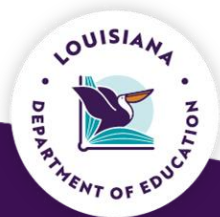
Do non-public/private school students get money or services?



Purpose of non-public/private equitable services

- Due to the separation of church and state laws non-public/private schools do not get direct or indirect funds.
- Only an allocation for services from the LEA (Local Education Agency)/school district and/or the SEA (State Education Agency)/State Department of Education.
- The services are always to benefit the non-public children/students and not the non-public/private schools.

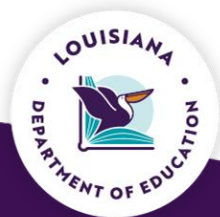
Should non-public services benefit the school overall for building and general improvements or academics only?



Purpose of non-public/private equitable services

- Non-public/private schools receive services because the parents/families who choose private schools for their children pay federal taxes and are eligible for educational support that is similar to our public school children.
- However, there are key factors that must be adhered too:
 - All instruction and services must be strictly secular, neutral and non- religious
 - Services must add to and supplement what is being taught not replace/supplant their general education format/curriculum that is required.

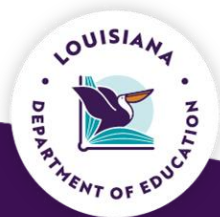
Is supplement updating the gym for physical education or adding yoga for physical and socio-emotional well - being?



Purpose of non-public/private equitable services

- Non-public/private schools must be non-profit and not for-profit because the law/federal statute defines eligible non-public/private schools as non-profit entities
- For-profit schools are more like a business and usually focused on creating income for shareholders.
- Non-profit schools re-invest revenue into the school for the students, educators, etc.

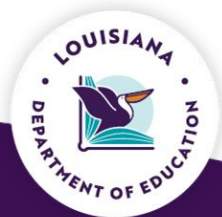
Which non-public schools can participate in the equitable services program?



Non-public equitable services program key facts

- Outreach to local non-public/private schools in your LEA is an important step that is often missed.
- Use community contacts, local newspapers, magazines, SEA, and word of mouth to locate new schools and extend an invitation to the non-profit nonpublic schools LEA equitable services program.
- During outreach share what is required for non-public schools to participate, share program highlights and invite their leaders to your non-public meetings to network and learn about the services.

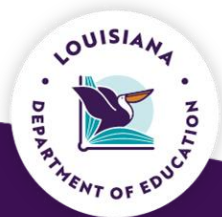
Does your LEA reach out to your new and non-participating non-public schools?



Non-public equitable services program key facts

- The ESSA of 2015 requires an SEA to designate an Ombudsman to monitor and enforce the equitable services requirements under both Title I and Title VIII of the ESEA.
- An Ombudsman is the primary contact for LEAs, private school officials, parents, families, and other stakeholders for questions and concerns about equitable services.
- The ombudsman is required to assist the LEAs and private schools with establishing workable and agreeable relationships.

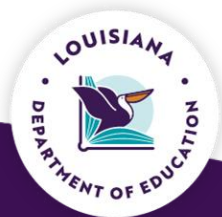
Do you know who your Ombudsman is?



Non-public equitable services program key facts

- **Consultation must be ongoing throughout the school year...**
 - Title I, Parts A and C Programs
 - Student Progress
 - Title II, III and IV, Programs
 - Needs Assessments
 - Budgets
 - Carryover
 - Site Visits
 - Inventory
 - Evaluations, etc.
 - Then repeat

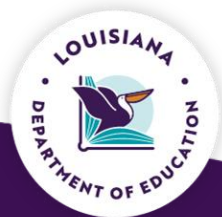
Do the services and consultation ever stop?



Non-public equitable services program key facts

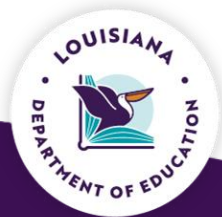
- All nonpublic input must be given considerable thought regarding the planning and implementation of the equitable services program. Consultation is the key and it can impact the effectiveness of an LEA and a private school's collaboration and success.
- Open lines of ongoing communication between LEA and private school administrators, organizational leadership, such as the Superintendents, Headmasters, CEOs, and their designees, etc. is required and crucial
- Consultation should include program guidance, Title requirements, and the importance of providing compliant and effective equitable services.

Who should I consult with first?



Non-public equitable services program key facts

- Consultation provides discussions of private schools and needs and quality academic programs/services
- Review of assessment data to identify eligible Title I students with the greatest academic need
- Discuss with transparency the allocation/proportionate share, LEA administrative and indirect costs to provide nonpublic

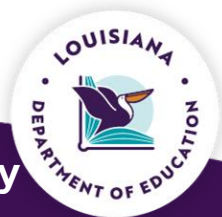


Non-public equitable services program key facts

Title I services and Title VIII services to provide:

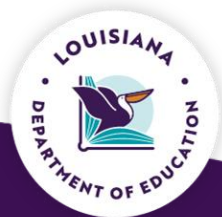
- student academic support, enrichment/acceleration to all nonpublic students, inclusive of: EL, migrant, and homeless students
- staff professional development/training opportunities
- pooling and transferring of allocations for services
- Identifying who will provide the services: LEA teachers/educators, retirees, third-party vendors/consultants

Who is the fiscal and program manager the LEA or 3rd party vendor/consultant?



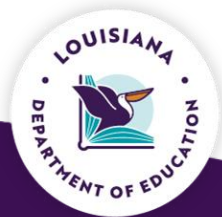
Non-public equitable services program key facts

- If the nonpublic school disagrees with the LEAs program or decisions, the LEA must provide a written justification to explain its decision.
- The LEA makes the final decision after giving considerable consideration to the nonpublic school's input.
- LEAs and non-public schools may consult with the Ombudsman regarding concerns to reach a workable and agreeable decision if needed.



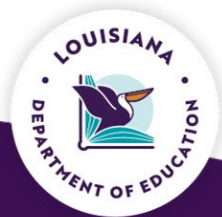
Important Reminders

- LEAs must consult with non-public schools before any transfer of federal funds are transferred that will affect the non-public's allocation for equitable services.
- Non-public schools can only use the allocation if the LEA agrees not to transfer the complete amount of funds.
- This means the LEA will leave an amount of funds/allocations for both the LEA and non-public school to receive services.



Important Reminders

- Pooling is an option if the non-public schools and the LEA agrees through a MOU (memorandum of understanding).
- Carryover of unobligated program allocations is required however, a LEA should not have a significant amount if services are monitored and ongoing budget meetings are held as needed.
- ESEA does not prohibit carryover of equitable services.



Important Reminders

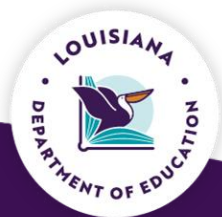
- Documentation is the key!
- Statute, non-regulatory guidance, EDGAR, federal program resource books and professional development sessions are your top resources for learning the equitable services program and federal programs
- Keywords related to everything federal programs are; allowable, reasonable, necessary and compliant
- Creating workable and agreeable relationships, teamwork, support, and networking
- What gets monitored gets done; on going site visits/ consultation keeps everyone compliant

What is the most important thing on this slide?



Equitable Services Resources and Information

- [Elementary and Secondary Education Act \(ESSA\) as amended by the Every Student Succeeds Act of 2015](#) (webpage)
- [ESSA Act](#) (pdf version)
- [Office of Non-Public Education \(ONPE\)](#)
- [Title I, Part A Equitable Services Updated Non-regulatory Guidance](#) (May 17, 2023)
- [Title VIII Equitable Services Non-Regulatory Guidance](#) (July 17, 2023)
- [34 Code of Federal Regulations \(C.F.R.\) Part 200 § 200.62-68 \(Title I, Part A\)](#)
- [34 C.F.R. Part 299 § 299.6-12 \(Title VIII\)](#)
- https://www.ed.gov/sites/ed/files/2020/10/equitable_service_guidance.pdf



LUNCH



Supporting English Learners



Legal Requirements

Title VI of the Civil Rights Act of 1964: Prohibits discrimination based on race, color, or national origin. The Supreme Court case *Lau v. Nichols* established that failing to provide language support to English learners denies them a meaningful education, violating Title VI

Equal Educational Opportunities Act (EEOA) of 1974: Requires state education agencies and school districts to take proactive, appropriate action to remove language barriers that stop students from equal participation in instructional programs.

[Ensuring Equal Educational Opportunities for English Learner Students](#)



Title I, Part A and ELs

The enactment of the Every Student Succeeds Act (ESSA) saw several requirements related to ELs move from Title III to Title I, Part A. These changes allow Title I funds to be used for a broader range of EL-related purposes. Allows for an EL set-aside.

Under Title I, Part A, ESSA:

- A. Expanded assessment and accountability requirements (ESEA 1111);and
- B. Includes several requirements related to the parents of ELs: parent notification, parent outreach, and notice and format (Section 1222(e)).

Note: Implementing an effective means of outreach must include holding and sending notice of opportunities for regular meetings for the purpose of formulating and responding to recommendations from the parents of ELs. Meetings must be specifically for parent of ELS and cannot be held at the same time as another meeting for parents.



Title III, Part A

- Title III, Part A is a supplemental grant under the Elementary and Secondary Education Act (ESEA) that is designed to improve and enhance the education of English learners (ELs).
- The purpose of Title III is to help ensure that ELs attain English language proficiency and meet state academic standards.
- To receive funding, a district must have sufficient enough number of ELs to reach \$10,000 threshold. Local educational agencies that do not meet the \$10,000 threshold may form a consortium to qualify for these funds.



Title III, Part A

School districts must use Title III funds for three (3) activities:

1. Providing effective language instruction educational programs (LIEPs) that meet the needs of ELs and demonstrate success in increasing English language proficiency and student academic achievement.
2. Providing effective professional development to classroom teachers (including teachers in classroom settings that are not the settings of LIEPs), principals and other school leaders, administrators, and school or community-based organizational personnel, that is:
 - Designed to improve the instruction and assessment of ELs;
 - Designed to enhance the ability to understand and implement curricula, assessment practices and measures, and instructional strategies for ELs;
 - Effective in increasing student's English language proficiency or substantially increasing the subject matter knowledge, teaching knowledge, and teaching skills of such teachers; and/or
 - Of sufficient intensity and duration to have a positive and lasting impact on teachers' performance in the classroom.
1. Providing and implementing other effective activities and strategies that enhance or supplement language instruction educational programs for ELs, which must include parent, family and community engagement activities, and may include strategies that serve to coordinate and align related programs.



Is it allowable?

Core rules and Limitations:

Supplement, Not Supplant: Funds cannot pay for services, staff, or materials required by federal, state, or local law (such as mandatory initial language placement testing or core general education classes). [1]

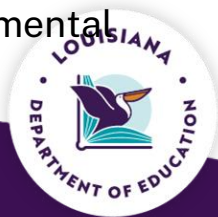
Administrative Cap: Direct administrative costs are capped at a maximum of **2%** of the total grant award for the fiscal year.

Necessary and Reasonable: Every expense must be allocable directly to the Title III program, matching standard market pricing and local district policies.

Allowable Instruction and Support:

Supplemental Staffing: Salaries for bilingual paraprofessionals or extra-duty teachers providing small-group instruction, tutoring, or mentoring outside of core requirements.

Curricular Materials: Bilingual educational software, leveled readers, and supplemental classroom supplies dedicated to EL students.



Allowable Instruction and Support:

Technology: Laptops, charging carts, and specialized devices used specifically by EL students when not funded by general local or state budgets.

Professional Development: Training workshops, conferences, and materials for teachers, principals, and administrators working with EL students.

Transportation: Costs for educational field trips or late buses tied directly to high-quality language instruction programs.

Family and Community Engagement

- **Parent Outreach:** Family literacy services, English as a Second Language (ESL) classes for parents, and parenting training.
- **Communication:** Translation services, interpreters for parent-teacher meetings, and newsletters targeted specifically to EL families

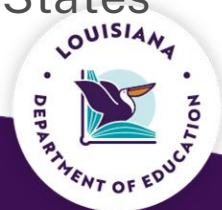


Title III, Immigrant Funds

Under Title III, Part A, funds are set aside to provide subgrant awards to school systems that meet eligibility requirements for participation in the Title III Immigrant Student Education Subgrant Program. The LDOE reserves 15% its Title III allocation for these subgrants.

The term "eligible immigrant student" is defined as an individual student who

- is aged three through twenty-one;
- was not born in any state (each of the 50 states, the District of Columbia, and the Commonwealth of Puerto Rico); and
- has not been attending any one or more schools in the United States for more than three full school years.



Title III, Immigrant Funds - How is award calculated?

States distribute these reserved immigrant funds to local educational agencies (LEAs) using specific eligibility and calculation rules:

- **Significant increase requirement:** Unlike general English Learner funds, Title III immigrant subgrants are only awarded to districts that have experienced a "significant increase" in the number or percentage of immigrant students. LDOE considers a 5% or more as a significant increase.
- **Two-year comparison:** States compare the current year's immigrant student count against the average of the previous two fiscal years. Since current year is used, these funds are not loaded until December.
- **Per-pupil allocation:** Once qualifying districts are identified, the state divides the total available immigrant subgrant pool by the aggregate number of eligible immigrant students across all qualifying districts to determine a per-pupil rate, which is then multiplied by each district's eligible count



Resources

[DOE Title III Training Modules](#)

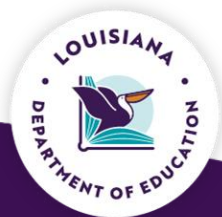
[Non-Regulatory Guidance: English Learners](#)

[Every Student Succeeds Act Title III](#)

[Ensuring EL Students can Participate Meaningfully and Equally](#)

[National Clearinghouse for English Language Acquisition](#)

[Immigrant Funds Guidance](#)

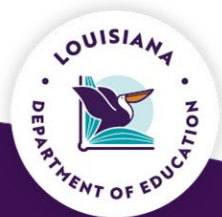


Title II



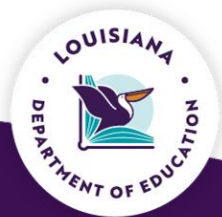
Purpose

- Increase student achievement consistent with the challenging State academic standards
- Improve the quality and effectiveness of teachers, principals, and other school leaders.
- Increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools.
- Provide low-income and minority students greater access to effective teachers, principals, and other school leaders.



Goals of Title II

- Enhance the quality of teaching and principal leadership in order to improve student achievement.
- LEA activities supported by Title II-A funds MAY include teacher, principal and school leader recruitment; training; induction and mentoring; professional development; retention; and class size reduction.
- LEAs should conduct an assessment of their hiring and professional development needs for improved teacher and principal quality.
- LEAs MUST provide teachers and staff of private schools within their boundaries with equitable opportunities to participate in professional development. This professional development must target the needs of private school personnel as determined through consultation with representatives of private schools



Allowable Expenditures

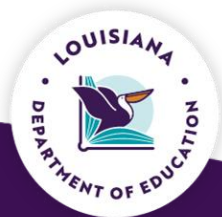
Here are a few examples:

- Professional learning for **all educators** (including librarians, counselors, arts teachers, and paraprofessionals)
- Job-embedded activities
- Teacher recruitment, training, and retention
- Partnerships with higher education and high-needs districts
- Grants to recruit, select, prepare, and provide professional development
- Grants to enhance education preparation programs
- Teacher mentoring and coaching
- Enhancing principals through ongoing professional learning



Non-Allowable Expenditures

- Classroom materials for students use are not allowable expenses.
- Funds may not be used for rental of a venue to provide professional learning unless the expense is determined to be necessary/reasonable and approved b.
- Title II funds may not be used to purchase food or beverage.



Title II and Private Schools

- All private school expenditures are to flow through the LEA. It is the responsibility of the LEA to ensure that the private schools receive their appropriate allocation/services for professional learning.
- A consultation with each eligible private school must be held. The Affirmation of Consultation Form must be completed by the LEA
- Professional learning for private school teachers and principals must be secular in nature and be linked to identified student academic needs.



Resource

Supporting Effective Instruction State Grants: Title II
Part A Non-Regulatory Guidance | [PDF](#) (January 14, 2025)

Program Contact Information

Edeltress Brown

edeltress.brown@la.gov

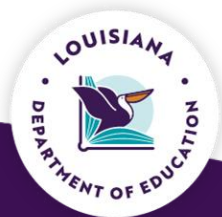


Title I, Neglected & Delinquent



Program Goals

- (1) improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that they have the opportunity to meet the same challenging State academic content and State student achievement standards that all children in the State are expected to meet;
- (2) provide these children with services to enable them to transition successfully from institutionalization to further schooling or employment; and
- (3) prevent at-risk youth from dropping out of school as well as to provide dropouts and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education.



Program Authorization: Subpart 2

The Subpart 2 Local Educational Agency (LEA) program requires each State Education Agency (SEA) to retain from its Title I, Part A (CFDA 84.010A) allocation, funds generated by the number of children and youth ages 5-17 living in local facilities for delinquent children, including adult correctional facilities.

Funds may be used for LEAs with high proportions of youth in local correctional facilities and dropout prevention programs for at-risk youth.



Program Description

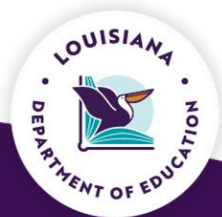
For Fiscal Year 2026-2027, the LDOE has incorporated questions for LEAs to complete in eGMS explaining program plans that will ensure eligible students are being served with Subpart 2 sub Grants.

The Budget Detail in Super App should reflect activities pertinent to your responses to the questions listed on the following slides:



Program Description

- Provide a description of the program to be assisted. What is the formal agreement (upload copies of formal agreements) regarding the program to be assisted between the local education agency and the juvenile detention center, correctional facility, Group home, etc.? (activities/program to be implemented)
- Provide a description of how participating schools will coordinate with facilities working with delinquent children and youth to ensure that such children and youth are participating in an educational program comparable to the one operating in the local school such youth would attend.



Program Description continued

- Provide a description of the program operated by participating schools to facilitate the successful transition of children and youth returning from correctional facilities. (transition process)
- Provide a description of how parents and family members will be involved in the efforts to improve the educational achievement of their children, assist in dropout prevention activities, and prevent the involvement of their children in delinquent activities?

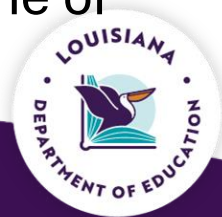


Facility Eligibility

Subpart 2- Local Education Agency (LEA) Programs

Children and youth who are 5 to 17 years of age during the count window and not counted in the State Agency Annual Count or other Title I funding stream counts. Each unique case is counted.

If a child or youth enrolled at the beginning of the count window, is officially released, and is re enrolled later in the count window, he or she should be counted twice.



Data for the Consolidated State Performance Report (CSPR)

- Data is collected once a year and includes ALL students served through Title I, Part D in the previous school year, which is typically defined as July 1-June 30.
- It is important to note that all students that were served using Part D funds should be included in the CSPR.
- LEAs can submit data through eGMS.



What to Collect? Federal Requirements

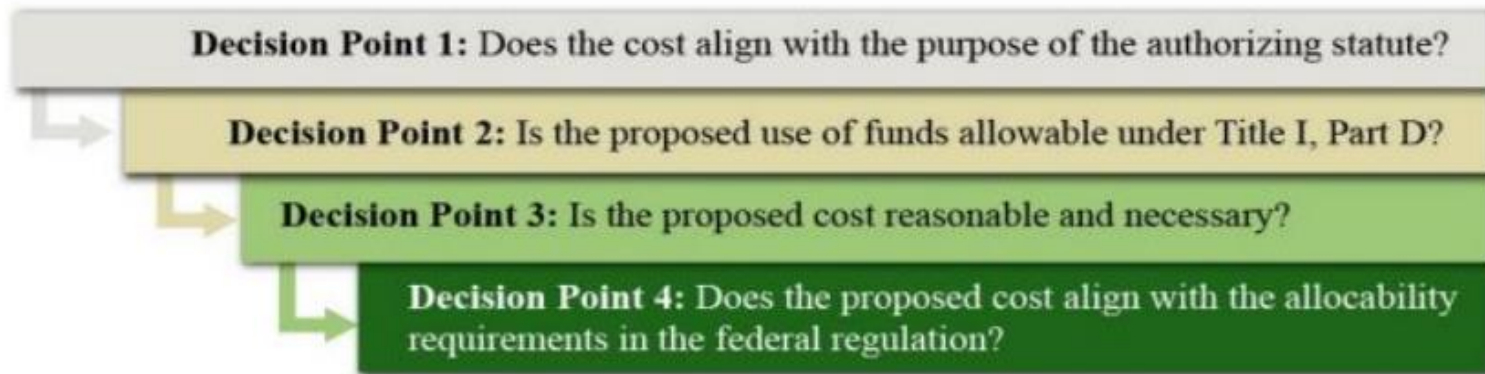
Each LEA program must submit data in the following areas:

- Student and facility counts
- Student demographics (race/ethnicity, age and gender)
- Transition services
- Academic and vocational outcomes
- Academic performance in reading and mathematics

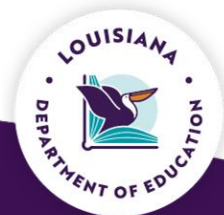


Cost Allowability

The infographic below provides a guide for understanding and assessing use of funds and provides guiding questions to help grant administrators in determining allowability.



The cost is allowable!



Timeline

- **Annual Count submission**

November-Request counts (Annual Count tab in eGMS)

December- Completion deadline

- **CSPR submission**

November-Request for data (eGMS application)

December-Completion deadline



Resource

TID Non Regulatory Guidance <https://www.ed.gov/media/document/tipd-non-regulatory-guidance>

Program Contact Information

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Title V, the Rural and Low Income School Programs (RLIS)



The Rural and Low-Income School (RLIS) program provides non-competitive federal funds to rural school districts with high concentrations of students from low-income families to help them improve student achievement.

Key Details

- **Governing Law:** Authorized under Part B of Title V of the Elementary and Secondary Education Act (ESEA) as part of the [Rural Education Achievement Program \(REAP\)](#).
- **Purpose:** Helps rural local educational agencies (LEAs) that often lack resources or staff to compete for competitive federal grants.
- **Eligibility Rules:**
 - At least 20% of children ages 5 to 17 served by the district must come from families with incomes below the poverty line (based on U.S. Census Bureau SAIPE data).
 - All schools in the district must have a designated rural locale code (NCES locale codes 32, 33, 41, 42, or 43) or be designated as rural by state agency definition

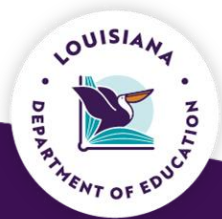


Allowable Uses:

Funds can support activities authorized under Titles I through IV of the ESEA, teacher recruitment and retention, professional development, parental involvement, and educational technology.



Break



Title IV



Purpose of Title IV, Part A

Title IV, Part A, Student Support and Academic Enrichment (SSAE) grants are intended to improve students' academic achievement by increasing the capacity of States, LEAs, schools, and local communities to:

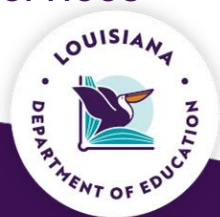
- Provide all students with access to a well-rounded education;
- Improve school conditions for students learning, and;
- Improve the use of technology in order to improve the academic achievement and digital literacy of all students. (*ESEA* section 4101).



Title IV, Part A Application Related Requirements

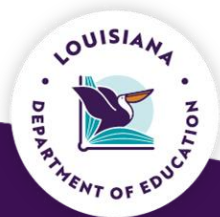
To be eligible to receive an allocation under ESSA, section 4105(a), an LEA shall:

1. Complete a needs assessment in accordance with subsection 4106(d) and keep documentation of such in district files for auditing purposes.
 - a. An LEA with an allocation less than \$30,000 shall not be required to conduct a comprehensive needs assessment [ESSA, section 4106(d)(2)].
 - b. An LEA with an allocation of \$30,000 or more shall conduct the needs assessment once every 3 years [ESSA, section 4106(d)(3)]. However, as a best practice, an LEA may conduct a Title IV, Part A needs assessment annually.
 - c. Separation of church and state means nonpublic/private schools can't get federal funding/money; however, LEAs may provide allocations for services as indicated in the nonpublic needs assessment.



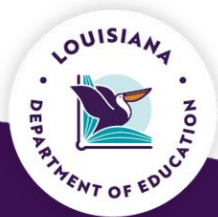
When funding Title IV-A activities, LEAs receiving an allocation of more than \$30,000 shall adhere to the content area distribution requirements [Section 4106(e)(2)(C-E)].

- Not use less than 20% of funds to support **Well-Rounded Education Opportunities (WR)**
- Not use less than 20% of funds to support **Safe and Healthy Students (SH)**
- Use a portion of funds (minimum 1%) to support the **Effective Use of Technology (TPD)**
 - Ensure no more than 15% of funds allocated to the effective use of technology is used for purchasing technology infrastructure, regardless of district Title IV, Part A allocation amount. This restriction would also apply to LEAs with a Title IV, Part A subgrant that is less than \$30,000.
- Ensure that no more than 2% of funds are used for direct administration



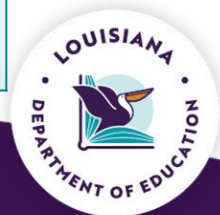
Original Allocation Under \$30,000

Situation	Needs Assessment	Objectives, Activities, Outcomes	20/20/Minimum 1% Rule
LEA Budgets Funds	NO	At least one section (WR, SH, or TPD)	NO
LEA Transfers All Funds *	NO	NO	NO
Carryover puts LEA over \$30,000	YES	All Three Sections (WR, SH, & TPD)	YES



Original Allocation \$30,000 or MORE

Situation	Needs Assessment	Objectives, Activities, Outcomes	20/20/Minimum 1% Rule
LEA Budgets Funds	YES	All Three Sections (WR, SH, & TPD)	YES
LEA Transfers All Funds *	YES	NO	NO
Transfer of Funds Puts LEA Under \$30,000 *	YES	At least one section (WR, SH, or TPD)	NO
Nonpublic Allocation Drops LEA Below \$30,000	YES	At least one section (WR, SH, or TPD)	NO



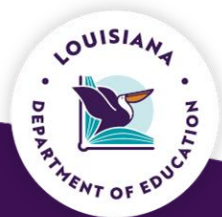
Access and Enrollment

Other Classes

- Foreign Language
- Technology
- Visual Arts
- Performing Arts
- Health/PE
- Career and Technical Education
- STEAM
- Advanced Coursework
- International Baccalaureate
- Advanced Placement
- Dual Enrollment

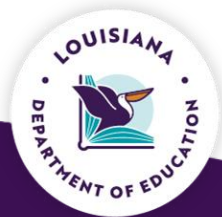
Access and Use

- Library
- College and Career Counseling

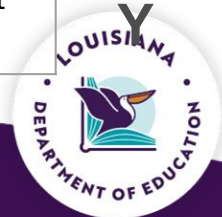


Types of Information an LEA Might Gather for WR

- Percent of students scoring proficient or higher in ELA/Literacy, Math, Science, and/or Social Studies
- Percent of students enrolled in:
 - Foreign Language
 - Technology/Business Education
 - Visual Arts and/or Performing Arts
 - Health/Physical Education
 - Career and Technical Education
 - International Baccalaureate program
 - Advanced Placement
 - Dual Enrollment credit
- Percent of students who have received College and/or Career counseling



Safe and Healthy	Areas to Consider
School Engagement	• Chronic Absenteeism • Dropout Rates
School Discipline	• Out-of-school suspensions • In-school suspensions • Referrals to law enforcement • Expulsions
Creation and Maintenance of a Safe School Climate	• Administration of a school climate survey and usage to drive decision-making • Physical fights on school property • Rape or sexual assault • Harassment and bullying
Availability of School-Based Service Providers	• Availability of school nurses, counselors, psychologists, social workers, behavior interventionists • Availability of personnel to coordinate support services.



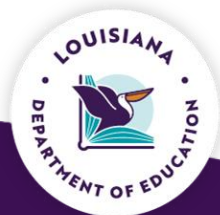
Types of Information an LEA Might Gather for SH

- Percent of students
 - who have missed 15+ days of school per year
 - with 10+ referrals this school year
 - with 5+ In-School Suspensions
 - with 1+ Out-of-School Suspensions
 - expelled this school year
 - in physical fights on school property
 - who report being harassed or bullied
 - who have been referred to law enforcement
- Percent of FTE staff identified as mental health professionals
- Dropout percentage rate
- Culture Survey



Effective Use of Technology

Use of Technology	Areas to Consider
Technology Access in School	• Internet Access • Availability of internet-enabled devices for staff and student use
Technology Use	• Use of computer for assessment • Use of blending learning • Availability of online courses that are offered for credit recovery from accredited sources • Availability of online college readiness courses that are offered for credit from accredited sources
Support Offered for School Staff to Use Technology	• Availability of FTE IT staff to deliver embedded training and onsite support to ensure effective implementation of technology usage • Participation of teachers in trainings offered by LEA on technology tools and integration.

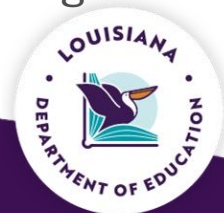


Types of Information an LEA Might Gather for TPD

- Number of:
 - schools that have internet access
 - WIFI enabled devices for STAFF to use
 - WIFI enabled devices for STUDENTS to use
 - OTHER TECHNOLOGY (e.g. SMARTBoards, tablets, etc.)
 - courses using computers for assessment
 - ONLINE courses being offered
 - FTE Instructional Technology staff
 - IT Professional Development opportunities
- Percent of teachers participating in IT PD opportunities



Are there emerging trends in educational technology that teachers may need support with? How will teachers develop skills for leveraging digital learning and technology to effectively and powerfully enhance student learning?



Title IV, Part A Application Related Requirements

An LEA shall include the following:

1. Description of the activities and programs the LEA will carry out under Title IV, Part A, including a description of:
 - a. program objectives and intended outcomes for activities under Title IV, Part A, and how the LEA will periodically evaluate the effectiveness of the activities carried out on its objectives and outcomes. [ESSA, section 4106(e)(1)(E)]



Objective, Outcomes, and Measures of Effectiveness

Under Section 4106, Contents of the Local Application, LEAs must describe “the program objectives and intended outcomes for activities” and how they will “periodically evaluate the effectiveness of the activities...”

Measuring objectives and outcomes provides evidence of effectiveness, bolstering LEAs confidence that the activities or interventions are high quality.



Three-Step Process for Implementing High-Quality Objectives and Outcomes

Step 1

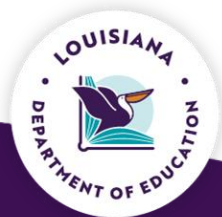
**Determine Activities
Based on Identified Needs**

Step 2

**Write High-Quality
Objectives and Outcomes**

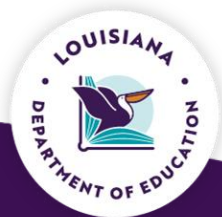
Step 3

**Regularly Monitor
Objectives for
Effectiveness**



LEA has conducted their Needs Assessment, and it indicates an increase in anxiety, depression, drug use, and suicidal thoughts and behaviors among middle and high school students.

What type of objective, activity, and measurable outcome could be created to address this need?



Last but not least -

Ask yourself

- 1) Are the expenditures or activities required by other Federal, State, or local laws?
- 2) Were the expenditures or activities funded in previous years by non-Federal funds?
- 3) Would the expenditures happen in the absence of Federal Funds?

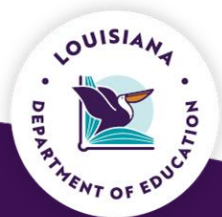
If you answer “**yes**” to any of these, this would be considered supplanting and would **NOT be** an allowable Title IV expense.

Always ask yourself - Is it **allowable, reasonable, necessary, and compliant?**



Resources

[Non-Regulatory Guidance Title IV SSAE \(Student Support and Academic Enrichment Grants\)](#)



Questions and Comments

NOTE: Review Parking Lot Questions (Each Program will have a Parking Lot Large Post-it for Questions, Comments, etc.)



Federal Program Resources

[2026-2027 Federal Funding Guide](#)

[Federal Support and Grantees Relation Library](#)

[Supplement Not Supplant Non-Regulatory Guidance](#)

[Fiscal Review Guidance](#)

[Title I Schoolwide Planning Guidance](#)

[Detailed Object Code and Education Improvement Category \(EIC\)](#)

