



Federal ESEA Title Programs and COVID-19 Questions and Answers: Funding, Services, and Programming

This document compiles questions the Minnesota Department of Education (MDE) has received relating to ESEA Title formula grants and services funded through:

- Title I, Part A Schoolwide and Targeted Assistance Program Models
- The Title I, Part A Set Asides for McKinney Vento Eligible Youth Experiencing Homelessness, Learners in Foster Care, and Family Engagement
- Title II, Part A
- Title III, Part A
- Title IV, Part A

The questions focus on programming and funding questions related to school closings due to COVID-19 and is accurate as of March 20, 2020. MDE understands there may be exceptional circumstances that could affect how a particular service is provided. This guidance continues to evolve as the situation develops and updated versions of this document will supersede any information provided here.

1. Are schools expected to provide Title I, Part A services through distance learning after March 27th?

Yes. Districts and schools should be developing their plan for how to adapt and continue Title I and other Title services through distance learning. Consistent with the definition of distance learning, students identified for targeted intervention should receive frequent interaction with the Title I interventionist in addition to or in coordination with their interaction with their general education teacher. If the Title I school is implementing Schoolwide school improvement strategies, the plan should adapt such strategies for distance learning.

When determining frequency of interaction, consider the percent of time a student would spend with an interventionist in a given week and create a plan that mirrors this. For example, if a student participates in 30 minutes a day of intervention in a 6-hour school day, which would mean about 8% of a student's day/week, is in intervention. In this example, if the classroom teacher is interacting daily then the interventionist should, at a minimum, interact once every other week with each student.

If it is necessary to change your plan from what is stated in the currently approved SERVS application, please be in communication with the MDE staff member assigned to your district in order to amend by April 30, 2020 in the SERVS application platform.

2. Are districts expected to implement activities for other, non-Title IA ESEA programs if the school remains closed after March 27?

Yes. For Title IIA and Title IVA, adapt as needed to be meet the district's current needs. If it's appropriate to change your Title IIA or Title IVA plan from what is stated in the currently approved SERVS application, please be in communication with the MDE staff member assigned to your district in order to amend by April 30 the SERVS application. For Title III, please consider information for continuing services for English Learners already provided in the School Closure Guidance.

3. Will the Minnesota Department of Education accept digital documentation of parent outreach, progress monitoring, virtual parent engagement events, and instructional programming?

Yes, even prior to the pandemic, MDE accepted digital documentation of the teaching and learning work occurring in Title I programs. Your district may begin keeping digital documentation for parent outreach, progress monitoring, virtual parent engagement events and instructional programming. Your district may opt to record your Title I records in a cloud based system like Google Docs or in a learning management system (LMS) like Moodle, Canvas, or Schoology.

4. How can our Title I part A money be used during this state of peace time emergency? Where might we prioritize redistribution of Title I part A funds during this peace time emergency?

Schools may choose to revise their school district's Title I, part A budget during this March and April amendment window. Schools may have had projects budgeted in Title I, part A that are no longer feasible. For example, schools may not be spending money that they had designated for travel, in-person professional development, and other in-person activities. Your district may wish to expand the McKinney Vento Homeless Set aside to make more materials available for homeless and highly mobile learners. Given the economic hardship caused by the pandemic, it is reasonable to anticipate that more e families will become McKinney Vento eligible.

5. Our school district has identified new priorities for learning during the COVID-19 pandemic. How can we amend our Schoolwide plan and budget to reflect these changes?

The amendment window for Title I part A grants is open until April 30, 2020. When making changes to your Schoolwide plan, involve stakeholders as you make decisions. Different ways to include stakeholders include a brief email survey, a phone call, or a conference call.

Here is a sample of a brief email survey:

Greetings Parents and Guardians,

Earlier this year Lake Woebegone Elementary prioritized experiential learning initiatives for all learners. Our teachers were planning to attend responsive classroom training and restorative circles training. Due to the pandemic, we would like to use our Title grant monies in a different way. Our stakeholder team is considering amending our plan to include subscriptions to an online learning platform, increasing the number of hot spots available for check out, and developing some train the parents about mathematics lessons to help parents better explain math concepts to their children. Please fill out the linked survey and let us know if you support these changes or if there are additional options we ought to consider.

Example Survey Text:

Check the box of options you believe will benefit our school community at this time.

Expanded subscriptions to a web-based learning resource

Web-based Math video tutorials for parents to better support their children

Purchasing hot spots for families in need of internet access

I have another idea. Please explain.

6. When can I submit revisions to my ESEA/ESSA Title grants?

The amendment window is open through the end of April 2020. You can submit or re-submit revisions anytime during March and April.

7. Our district filed a revision to one or more of our ESEA/ESSA Title grants within the last three weeks, but we need to make changes to it again. Is that allowed?

Yes, you may re-amend amendments made during the amendment window from March through April 2020.

8. Can our district revise our Title IV, Part A application to include additional Safe and Healthy supports?

Yes. For example you could use it to establish a mental health hotline for students and families to deal with the COVID-19 illness by contracting a vendor. Supplementing to add additional counseling and social work services would also be allowable revisions. [Read more about Title IV, Part A on the webpage.](#)

Note that this is also an allowable use of Title I Part A monies for any Schoolwide Program with the consent of the school's stakeholders.

9. What costs are allowable when providing Title I Part A services through distance learning?

ESEA provides significant flexibility in how to meet the purpose of each of its programs. An expenditure is allowable if it is (a.) necessary and reasonable for implementing the grant award and (b.) allocable to the funding award consistent with the relative benefits for eligible participants.

Each cost must be necessary for achieving the purpose of each grant award as listed below:

- **Title I, Part A:** improve achievement of students who are not meeting academic standards
- **Title II:** increase academic achievement of all students by improving access to effective teachers and school leaders
- **Title III:** ensure that English learners (ELs) and immigrant students attain English proficiency and meet state academic standards.
- **Title IV, Part A:** increase the local capacity to provide all students access to a well-rounded education; improve school conditions for safe and healthy students; and improve use of technology to improve academic achievement and digital literacy.
- **Title I, Part C:** ensure all migrant students reach challenging academic standards and graduate
- **Title I, Part D:** support dropout prevention and education continuity for at-risk and incarcerated youths

- **McKinney-Vento:** ensure children and youth who experience homelessness receive a free, appropriate public education.

Specifically for Title I, Part A, school expenditures must only benefit Title I students according to the school's plan but, in a public Title I school, the expenditures are not required to be supplemental. In a public Title I school providing Targeted Assistance or in Title I services for students in nonpublic schools, Title I students are those who have been identified as needing assistance according to multiple, education-related, objective criteria established by the district and/or school. In a Title I school implementing Schoolwide school improvement, all students are Title I and allowable costs are related to strategies identified in the written Schoolwide plan. Title I funds which the district has reserved and not allocated to schools must only benefit Title I schools and must be supplemental to district-level expenditures of non-federal funds.

10. During the eight-day closure or afterward, does anything need to change regarding time and effort for staff who have been paid all or in part with Title funds?

During the eight-day closure, staff should be paid as if school was in session and documentation of work activity can continue consistent with their prior work schedule. Document your decisions and the guidance you receive for this time period.

When distance learning begins, consider how each staff member's work activities and schedules have changed. As of that date, change as needed any documentation of time and effort to report the distribution of actual work activity between cost objectives (the funding source and, if applicable, any cost which must be separately tracked and reported). In turn, the business office will need to adjust charges to the funding streams consistent with the actual distribution of work activity. Keep all documentation and support for any adjustments made, as per usual internal controls and expectations.

11. How might our school district or charter school spend funds that we had budgeted for Family Engagement activities (especially in school districts with a required Family Engagement set aside)?

There are several possible uses for your Family Engagement using Title I Part A money. The goal of connecting learners and their families engaged in distance learning may include the district spending money on hot spots. Family Engagement money could also be used to develop resources to help families better support their own learners:

- Creating web-based modules showing parents how to read a book or discuss a book with their learner.
- Calling parents to learn how you might be able to get materials to help support them.
- Compiling lists of online story casts or virtual field trip experiences with suggested learning experiences. Please refer to the list of Resources for Distance Learning (below).
- Coaching tutorials to help parents to show their use of print resources around the home.
- Teaching tutorials for parents to talk about how they solved a story problem or Cognitively Guided Instruction problem.
- Coaching parents to notice and talk about numbers, shapes, distances, money and math concepts in everyday life.

As your charter school or district develops parent resources, please take language access into account. Consider how your work could be published in the frequently spoken languages within your community.

12. How might our district use our Title I subpart A paraprofessionals in a Targeted Assistance Program model during distance learning?

Instructional paraprofessionals in a Title I Targeted Assistance Program model specialize in supporting small groups of learners. They are able to support the work of learners and learning in a distance learning model too!

Paraprofessionals and Literacy Development:

Consider having your paraprofessional staff reach out to students via phone or web-based platform to read with students or talk to students about their day. Oral language development is a crucial building block of all language development. Having learners have conversations with adults strengthens the learner's productive language skills.

Paraprofessionals and Math Development:

Consider having your paraprofessionals talk about math with learners using a phone or web-based platform. With very young learners, they might work on counting aloud, skip counting, and counting backwards. With older learners the use of math talks can help learners develop their ability to discuss how they understand mathematical concepts. *Number Talks: Helping Children Build Mental Math and Computation Strategies, Grades K-5* by Sherry Parrish is an excellent resource to help teachers support oral language development and each learner's development as a mathematician.

13. Are there any specific requirements for Title I services moving forward with distance learning in a Title I Part A Targeted Assistance Program model?

Title I Targeted Assistance Program models are designed to support learners who are not yet achieving grade standards. Title I also supports the development of learners and the engagement of their families. You should consider what kinds of support could maximize their family interaction. In this time of teaching students using different delivery platforms, here are a few things Title I teachers of learners in a Targeted Assistance Program model may consider:

Grades K -2

- Encourage families to work together to show everyday math (cooking, timing, measuring) around the home.
- Encourage families to involve young learners with counting tasks as they unload the dishwasher or help dry the dishes. How many plates? How many forks?
- Encourage families to discuss books they read and shows that they watch.
- Encourage families to tell stories.
- Talk to your learners on the phone. Have a conversation about a story they watched, read, or heard.
- Read students a story on the phone or on a web-based platform. Ask learners to draw a scene from the story and take a picture of their work and to send to you.
- Encourage learners to teach something to their stuffed animal, pet, younger sibling, or imaginary friend.
- For learners who read, encourage them to build their reading stamina by reading for one minute more each day.
- Encourage parents of youngsters to online resources like [Bedtime Math](#) and real world resources to talk about mathematics as a family.

- For bilingual and multilingual families, stress that all of these activities can be done in the learner’s home language and/or in English.

Grades 3-6

- Encourage families to work together to show everyday math (cooking, timing, measuring) around the home.
- Call your learners and have them practice reading to you.
- Talk to your learners on the phone. Have a conversation about a story they watched, read, or heard.
- Put out Cognitively Guided Instruction (CGI) math prompts or story problems for your learners through your school’s website or learning management system. Have them show their work, snap a picture, and send it to you. Then, give them a call and talk about their process for finding their solution.
- Ask students to write a review of a YouTuber’s show or TV show. Have them type up their response and send it or take a picture of their handwritten review and send it to you.
- Ask students to create posters or book jackets for books they have read.
- Have learners write instructions for a task that they know how to do at home.
- Have learners make a short video teaching the steps to do a task they can do at home.
- Many online software programs are offering free access to learning resources for teachers, parents and students. Please reference the list of Resources for Distance Learning below.

14. How do districts ensure their Title III grant applications are in compliance with all three required areas?

There are three required areas of spending within the Title III grant application: 1) language instruction educational program (LIEP), 2) professional development (PD) and 3) parent, family and community engagement. As we wait for more information about the timeline for distant learning, consider how the distant learning setting will impact the district’s Title III budget and spending. It is possible that some conference or workshop fees, transportation and lodging may not be necessary. Additionally, resources students normally have in the EL classroom may need to be purchased for home use. The district should consider moving funds from PD or parent, family and community engagement to the LIEP tab. For example, funds could be reallocated from PD to the LIEP to purchase stylus pens for iPads, or to purchase folders to hand out materials to parents. Supplies like pens, pencils and notebooks might be needed to help English learners participate in a home setting. As the district begins to reallocate funding in its Title III application, ensure that at least 1 per pupil funding unit (PPFU) is allocated to each budget area. Additionally, ensure that the district spends that 1 PPFU in each area before July 1, 2020. For information around Title III requirements, visit the [Title III Program Review page](#).

- Language Instruction Educational Program (LIEP):** Instruction in the distance-learning context will require shifts in implementation, materials, resources, “face-to-face” direct instructional time and so on. Instruction of all types should be determined based on proficiency level and needs in each language domain (reading, writing, listening and speaking). Additional resources may need to be purchased to ensure instruction meets the needs of students and is relevant to and practical in the new context. It is important that Title III funds be used only for those materials and resources needed to supplement the core English language development instruction of English learners. It must not be used to purchase materials that all other students already have access to through other funds (e.g., if all students receive one-to-one Chromebooks, the LEA may not purchase Chromebooks for ELs with Title III dollars).

- b. **Professional Development (PD):** As districts move to distance learning, the costs for PD may be reduced. Online PD, such as webinars, and other training will not accrue the previously-budgeted travel costs. Remember, as mentioned above, it is required to allocate some funds to PD in the grant application. If no expenditures have been made towards the PD spending requirement in Title III, the district may use Title III funds for upcoming district PD. These expenditures may cover the cost of downloading or printing materials from online EL-related PD. The district should use caution in ensuring expenditures do not supplant what is already available for other programming. Ideally, though, there are other expenditures that are already made for PD in the district's budget (ex. the fall [MELEd conference](#)). In this case, any remaining funds that are no longer needed to provide professional development can be adjusted during the spring amendment window and reallocated to the other two funding options (LIEP or parent, family and community engagement).
- c. **Parent, Family, and Community Engagement:** Parent, Family, and Community Engagement: With social distancing, in-person parent and community events are no longer a healthy, viable option. The district should consider other modes of engaging families. For example, the district could set up online video chats and webinars, make phone and video calls to individual families, and arrange for translation services. Other options that the district could utilize are those that do not require reliable internet access. These options could include distributing board games, books, and materials that incorporate storytelling and reflection, language practice, build on native language skills, and provide for interaction with family members. Districts should also consider reaching out to community-based organizations for culturally specific resources and ideas about how to help families talk about covid-19 and cope with isolation, stress, and anxiety.

15. What are personal or situational challenges that students might experience learning from home?

Students from low-income, immigrant, and refugee-experienced communities who have younger siblings at home may be expected to take care of their younger siblings and elderly grandparents while their parents continue to work. Their responsibilities may include, but certainly not limited to: cooking, cleaning, bathing younger siblings, administering medication for elderly grandparents, go to the store for groceries, and (if possible) transport family members to the family's primary medical clinic for all related purposes. For these students, homework may become less of a priority as they learn to adjust and cope with the stress from having increased responsibilities, experiencing frequent disruptions, noise, and limited or inadequate space to do their work.

It is recommended that teachers and designated support staff be intentional about maintaining frequent communication with these students, specifically to assess their emotional/physical well-being and home life circumstances; and, if necessary, adjust students' workload to accommodate their evolving needs and challenges.

16. How can "social distancing" negatively impact students and families who rely significantly on community support and interaction?

Students from immigrant and refugee-experienced communities may experience a surge in stress and anxiety caused by the loss of their sense of community. Typically, recently arrived immigrant communities rely heavily on extended family and community connections for emotional health support. Social distancing may also hinder their ability to navigate complex social service systems for supportive services such as: language access, health and medical resources, and state designated covid-19 financial assistance. Any burden or challenge that

immigrant parents experience will indefinitely be passed along to their older children as resources in the home become increasingly scarce and isolation the new norm.

It is recommended that teachers and designated support staff check-in and assess students and parents' mental health and be prepared to offer resources and referrals as needed. Teachers should consider assigning homework where the whole family can meaningfully participate in to encourage positive family bonding, communication, and healing.

17. What is the LEAs responsibility for Title I family engagement? How will the school maintain and document communication with families?

More than ever, distance learning requires a partnership between the school and family. For any student in a Title I program, a teacher should contact the family, preferably by phone, Skype, Zoom, etc., to discuss the plan for continued learning. This should include the type of activities being provided, how they will be delivered, how each family can support their child's learning, and how the teacher and family can maintain on-going communication. The school should also consider other forms of family engagement such as connecting families with each other through phone, social media, etc.; making families aware of available resources; and surveying families to learn of their needs, concerns and suggestions.

Records of interaction with families can be maintained via the school's learning management system or recorded on a spreadsheet or journal. Your interactions with families may occur via the web through a Learning Management System (LMS), Facetime, Skype or Zoom, or over the phone. Part of our work as educators in Title I subpart A is to help facilitate the work of engaging families in the learning process. Consider how you might help build the capacity of families to support their learners from home. Be sure to let multilingual families know that activities done in their home language will benefit their student!

18. Do districts need an RFP if they are procuring software from a specific company if the amount is greater than \$10K?

An RFP would not be required until the cost is over \$175,000. A cumulative purchase over \$10,000 requires either multiple quotes [§200.320(b)] or meeting one of the conditions for a noncompetitive purchase [§200.320(f)]:

- 1) The item is available only from a single source;
- 2) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- 3) The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the LEA; or
- 4) After solicitation of a number of sources, competition is determined inadequate.

Under the circumstances, option 2 can be used. The LEA should document (make note on the requisition or PO) what they did to meet the federal procurement requirements. Retain documentation of the LEA's rationale on why this purchase is reasonable and necessary. If using multiple quotes, a screen shot from the vendor's website or email from the vendor with the price (and features if that outweighs the price in the decision) is sufficient.

19. Can we purchase 1 to 1 devices like iPads or Chromebooks using Title I Part A monies?

Yes, in the following circumstances:

- **In a Title I Part A Targeted Assistance Program model**, any technology purchased with Title I monies should be used for students identified for Title I targeted supports (which also can include multilingual learners, migrant learners, homeless youth, and youth in foster care).
- **In a Title I Part A Schoolwide Program model**, a determination will need to be made by the Schoolwide Team, and then Schoolwide Plan must note or must be amended to note the purpose to the school's goal in purchasing the technology.
- **For homeless or highly mobile learners**, in this time of emergency, a device like an iPad, phone, or Chromebook is essential for the child's connections with school. Therefore it is an allowable expense to purchase a device for a learner experiencing homelessness using your Title I subpart A McKinney Vento set aside funds.

District leaders should consider the distinction between district funds and school funds. Any district funds will be subject to supplement and not supplant regulations. At a school level, assuming the school receives the same funds it would receive if it were not receiving Title I funds, the school does not need to demonstrate supplement not supplant.

20. Can we purchase internet hot spots and/or phone cards for Title I students, and may we equip school busses with hot spots?

Yes.

- **For homeless or highly mobile learners**, in this time of emergency, internet and phone cards are essential for the child's connections with school. Therefore it is an allowable expense to purchase a device, a hot spot, a phone card or any other mechanism for a learner experiencing homelessness using your Title I subpart A McKinney Vento set aside funds.
- **In a Targeted Assistance Program model or in a Schoolwide Program model** and given the need to create learning environments that are not at school, the purchasing of internet and phone cards could be considered a mechanism through which we engage families and would be allowable as a family engagement expense.
- Before spending your ESEA Title grant money on hot spots or low cost internet, please check with your community internet providers as many are offering expanded service.

21. Can we purchase a cellphone for work use our school social workers, counselors, and homeless liaison?

Yes, any supplies needed for homeless liaisons and counselors to support homeless and highly mobile learners is an allowable expense with the McKinney Vento Title I Part A set aside.

22. Can we purchase prescription drugs for students who are McKinney Vento eligible with Title I part set aside funds?

Yes. The McKinney Vento set aside funds in Title I part at may be used to purchase prescription drugs, health and hygiene supplies, and meet the basic needs of learners identified as McKinney Vento eligible. For more information visit [NCHE's publication about allowable McKinney Vento costs](#).

23. Can our district carryover money from our ESEA Title grants?

Title I-A allocations over \$50,000 or more have a maximum 15% carry-over threshold and LEAs can request a waiver once every 3 years or more if more than 15% is needed. See the [ESEA webpage](#) for additional information.

In **Title II-A**, 100% carry over is allowed. However, LEAs are encouraged to spend the allocation in the year it was generated. All funds have a 27 month lifespan.

In **Title III**, 100% carry over is allowed. However, LEAs are encouraged to spend the allocation in the year it was generated. All funds have a 27 month lifespan.

Title **IV-A** allocations allow for 100% carry over. However, LEAs are encouraged to spend the allocation in the year it was generated. All funds have a 27 month lifespan.

24. In what circumstances might the U.S. Department of Education consider a waiver for Maintenance of effort requirements?

According to Attorney Claude Bornel (2020) the U.S. Department of Education can waive some grant requirements:

Due to exceptional or uncontrollable circumstances, such as a natural disaster or if a local educational agency's financial resources significantly decrease, [Section 8521\(c\) of the Every Student Succeeds Act](#), Pub. L. No. 114-95, allows *ED to waive MOE requirements. The coronavirus pandemic may be considered a natural disaster and affect an LEA's financial resources.*

For example, in Letter to: Brucklacher, [119 LRP 28089 \(EDU 03/29/19\)](#), ED indicated that it *may grant an MOE waiver when the waiver would be equitable due to a precipitous decline in an LEA's financial resources or an exceptional or uncontrollable circumstance.*

In Letter to: Keleher, [119 LRP 14487 \(EDU 06/18/18\)](#), ED explained that under ESSA Section 8521(a), *MOE determinations are based on a comparison of expenditure data from the preceding fiscal year compared to the second preceding fiscal year, meaning that Puerto Rico's MOE waiver issues related to the 2017 hurricane season would not affect MOE determinations until fiscal year 2019 funds.*

ED may also consider cases where general education funds were transferred to other purposes as an "exceptional circumstance." In Letter to Feather, [117 LRP 21953 \(EDU 01/10/17\)](#), *ED approved an MOE waiver to an Idaho district that transferred education funds to its Medicaid and food services accounts to eliminate deficits.*

States may not consider for MOE purposes expenditures a district makes for community services, capital outlay, debt service, or supplemental expenses made as a result of a presidentially declared disaster ([34 CFR 299.5 \(d\)\(2\)\(i\)](#)).

Bornel, C. (2020, March 18). Asked & Answered Features. Title I issues for LRP Publications. Retrieved from TitleAdmin.com.

Please note that there has been no waivers applied for by or granted to the Minnesota Department of Education (MDE). We are closely monitoring communication from the US Department of Education and will consider all opportunities to alleviate compliance burdens through available waivers.

25. Is the United States Department of Education or the Office of Management and Budget (OMB) discussing specific flexibilities with ESEA/ESSA Title Grants?

At this time the United States Department of Education is updating news about programmatic [responses to COVID-19 on their website](#). At this time there is no specific guidance for ESEA/ESSA Title Grants.

According to the **Uniform Grant Guidance 2 CFR 200.102.**:

Exceptions (a) With the exception of Subpart F—Audit Requirements of this part, OMB may allow exceptions for classes of Federal awards or non-Federal entities subject to the requirements of this part when exceptions are not prohibited by statute. However, in the interest of maximum uniformity, exceptions from the requirements of this part will be permitted only in unusual circumstances. Exceptions for classes of Federal awards or non-Federal entities will be published on the [OMB website](#).

At this juncture the Office of Management and Budget has not yet published exemptions. Given the unusual circumstances, the federal government does have the authority to exempt some grant requirements.

Resources for Distance Learning*

*The following resources are not vetted nor endorsed by MDE.

Mathematics

[Bedtime Math](#)

[ST Math](#) (Free school and parent access)

[Kahn Academy](#)

[The Math Learning Center](#)

[Starfall Education for Kindergarten and Pre-K](#)

[Starfall Education for Grades 1, 2, and 3](#)

Literacy

[Scholastic Classroom Magazines](#)

[Age of Learning Resources](#)

[Storyline Online](#)

[Mystery Science](#)

Multilingual Literacy

[Duo Lingo](#)

[Ojibwe Language Word of the Day](#) from James Vukelich

Virtual Field Trips

Travel to Museums [Google Arts and Culture](#)

[The San Diego Zoo](#)

[Yellowstone National Park](#)

U.S. Department of Education and Office of Management and Budget Resources

[The US Department of Education's Corona Virus Page](#)

[Office of Management and Budget's Statements and Releases](#) (scroll to the bottom of the webpage)

MDE School Closure Guidance for Public School Districts and Charter Schools (March 18, 2020)

[03-18-20: School Closure Guidance for Minnesota Public School Districts and Charter Schools](#)