Title I Equitable Services Pooling Guidance

Office of Federal Programs
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What is Title I equitable service "pooling?"
Eligibility for Title I, Part A is based on a child's residence and not where the child attends school. It is common that multiple Local Education Agencies (LEAs) have a responsibility to provide Title I services to eligible children who attend the same private school. The Title I Equitable Service Nonregulatory Guidance outlines how the equitable service amounts for multiple LEAs may be pooled. By pooling, LEAs can potentially provide services in a more efficient manner and effective to a nonpublic school than if each individual LEA provided services to its own eligible students in the same private school.

How does pooling work?
Multiple LEAs may pool the Title I funds generated by their private school children to serve eligible low-achieving private school children in the school. In other words, low-achieving private school children in greatest need who reside in a participating Title I public school attendance area in any of the applicable LEAs may be served with the pooled funds. The LEAs, in consultation with appropriate private school officials, must establish criteria to determine the eligible private school students in greatest educational need to receive services.

Steps to Implement a Pooling Model:

- Multiple districts generate an equitable service amount for a nonpublic school.
- The districts agree on a single service provider to provide the Title I program. This must occur before the start of school. The service provider can be a district, educational service center or third-party provider.
- The public districts must maintain control of the equitable service funds generated by their district and ensure that the Title I program requirements are met for the students from their district that are served through the pool.
- Pooling language should be included in the Memorandum of Understanding.
- The service provider plans the Title I program for the totality of the services.
- Only children from districts that contributed to the pool may receive services. Pooling does not mean "schoolwide model of delivery".
- The service provider provides a properly licensed teacher for the grade/subjects in which services will occur. Intervention specialist license and Nontax license are not considered proper licensure.
- The service provider maintains multi-criterion forms, rank order lists, teacher schedules, school parent compacts and evidence of parent engagement. This is provided to all districts before invoicing for the service amount.

Topics to consider and include in the Memorandum of Understanding:

- How will Title I monitoring documentation be provided and when?
- Who will provide any required parent engagement activities and how will it be documented?
- If the total sum of the pool is not expended, districts that contributed to the pool can not be billed for the total displayed in CCIP. What will happen to unexpended funds?
- What happens if a district enters into a Memorandum of Understanding for services with pooling language and in the fall and the district has zero children enrolled at the nonpublic school?

- If a district has carryover from the prior year, will it be included in the pool?
- How will equipment, materials and supplies be provided?
- Pooling requires reimbursements from outside districts. These reimbursements can not be made to 572. Can a special cost center be used to track pooled expenditures and reimbursements to the general fund?
- Pooling requires communication amongst all parties. How will you ensure all involved get information in a timely manner?

Resources:
Providing Equitable Services to Eligible Private School Children, Teachers, and Families Updated Non-Regulatory Guidance, October 7, 2019