Allowable Use of Funds
The Elementary and Secondary Education Act (ESEA), reauthorized by the Every Student Succeeds Act of 2015 (ESSA), allows local educational agencies (LEAs) administering a program under Title I, Part A to set aside a portion of the funds to implement district managed activities (DMA). DMA may be utilized to support Title I schools identified for comprehensive (CS) or targeted (TS) support and improvement or to provide a benefit to a group of Title I schools. However, DMA is not truly “districtwide” in that non-Title I schools may not be supported through this set-aside.

LEAs utilizing the option to set-aside funds for DMA should ensure the activities reflect a programmatic decision to run a district initiative that aligns with the intent and purpose of Title I, Part A, and should not be used as a means to avoid serving schools at the school level. LEAs should ensure that schools are served in compliance with rank order requirements, as defined under section 1113.

Unless directing DMA to prioritize supports for schools identified for comprehensive (CS) or targeted (TS) support and improvement, DMA should be used to provide a benefit to a group or all Title I schools. Allowable uses of the DMA may include, but are not necessarily limited to, the following circumstances:

- Additional services and supports for Title I schools identified for CS or TS;
  - Additional services and supports should address the reason(s) the school(s) were identified for CS or TS
- Pay differential in Title I schools (Pay differential is used to equalize and account for the amount schools must spend on salaries and fixed charges);
- Hiring an outside expert to work with the staff of low-performing Title I schools to build their capacity to analyze student data and identify promising interventions;
- Contracting with an outside provider with expertise in school improvement to support low-performing Title I schools;
- Supplying supplemental instructional materials to improve the academic growth and achievement of students in low-performing Title I schools, including students with disabilities and English learners;
- Extending learning time in Title I schools (before- and after-school programs, Saturday school and summer school, extending half-day kindergarten to a full day, extending the school year, extended learning opportunities during the school day, adding time during the day for teachers to plan collaboratively);
- Supporting a district-operated preschool program;
- Costs to provide transportation (up to 5% of the Title I, Part A allocation) for students attending a school identified for:
  - comprehensive support and improvement to transfer to another higher-performing public school in the district; or,
  - targeted support and improvement or additional targeted support and improvement to transfer to another higher-performing Title I school in the district;

Frequently Asked Questions

Q: Can the district use DMA to serve non-Title I schools?
A: No. DMA should be used to provide services to Title I schools through a district managed initiative. DMA is not intended to provide Title I services to non-Title I schools.

Q: If our district only serves down to schools with 80% poverty, may we serve a school with 78% poverty with DMA?
A: No. The LEA should ensure that schools in need of Title I services are being served at the school level with a per-pupil amount that is sufficient to make an impact in the school. LEAs may not avoid rank order requirements by utilizing DMA.

Q: Can the district set-aside more than 20% of the Title I allocation for DMA?
A: Generally, no. Title I funds are intended to support students at the school level, therefore DMA should be limited in scope. However, CDE has implemented a waiver process that LEAs may utilize if a justifiable reason to exceed the 20% limitation exists. See the waiver process below for more information.
• Piloting a data dashboard to help teachers in Title I schools identify, track and analyze data to help them better target interventions to low-performing students;
• Paying for extended time for teachers in Title I schools to review data for at-risk students and identify interventions to better meet the needs of those students; and
• Additional parent and community engagement activities in Title I schools.

Consultation Requirements and Considerations for the Use of DMA
LEAs should ensure that stakeholders have been meaningfully engaged in the development and design of the LEA’s Title I plan, including the intent to implement DMA, and that the LEA has afforded the public a reasonable opportunity to comment on the planned use of funds.

The intended use of Title I, Part A funds is to support student achievement and growth at the school level, therefore the use of DMA should be limited and the majority of funds should be allocated to the school level. LEAs that implement DMA are permitted to set-aside up to 20% of their total Title I, Part A allocation for this purpose. If the LEA intends to exceed the 20% limitation, the LEA must complete the waiver process, as described below.

LEAs should note that DMA should not be used as a means to avoid serving schools at the school level or as a means to avoid rank order requirements. The intent of Title I, Part A funds is to concentrate funding in schools with the highest percentages of poverty and to provide sufficient funds to those schools to make a difference in the academic performance of eligible students.

Budgeting DMA in the ESEA Consolidated Application
When entering district managed activities into the ESEA Consolidated Application budget, the funds should be budgeted at the district level in the Location tab. LEAs should include in the activity description the name of the school(s) that will benefit from each specific activity. LEAs should select “Title I-A District Managed Activity Set Aside (9206)” as the Funding Source.
Waiver Request Process

LEAs that propose to exceed the 20% limitation for the use of DMA are required to complete a waiver request by providing the information below and must email the completed form to the Office of ESEA Programs at consolidatedapplications@cede.state.co.us prior to submitting the Consolidated Application, no later than June 30. **A request to exceed the 20% limitation must be submitted annually.** Approval is granted only for the funding year in which a waiver request is received. LEAs that do not propose to exceed the 20% limitation are not required to complete the waiver process.

The Office of ESEA Programs within the Colorado Department of Education (CDE) will review the LEA’s request to exceed the DMA limitation during the review of the LEA’s Consolidated Application. The LEA will be notified of whether approval has been granted through the regular review process. CDE may request additional information prior to granting approval of the waiver request.

**I. Funds**

Total Preliminary Title I Allocation: __________________________

Requested Amount to Set-aside for DMA: __________________________

Percentage Requested to Set-aside for DMA: __________________________

**II. Planning, Reasoning, and Evaluation**

(a) Describe the process the LEA utilized to identify the need to implement a district level initiative, funded with Title I, Part A funds. Include the data sources and content that assisted the LEA in determining that the district managed activities are more effective than school managed activities (i.e. did the LEA review how many additional schools may be served if the set-aside did not exceed the limitation; did the LEA review the amount by which PPA may be increased at the school level if the set-aside did not exceed the limitation).

(b) Provide the LEA’s reasoning for requesting to exceed the 20% limitation for the use of the DMA set-aside. Include an explanation of how the LEA will ensure that the funds sent to the school level are of an amount that is sufficient to support student achievement in a meaningful way (i.e. per pupil allocation). For example, if the LEA is requesting 23% of the Title I, Part A allocation be set-aside to provide DMA, explain how the district determined that the proposed activities would better meet the intent of Title I, Part A, as opposed to serving schools at the school level.

(c) Provide a description of the LEA’s method for evaluating the effectiveness of the DMAs on an on-going basis.

**III. Use of Funds**

Describe the LEA’s proposed activities funded by the DMA set-aside.

**IV. Signatures**

The signature(s) below affirms that the LEA has engaged in the required stakeholder engagement and planning processes as outlined in Title I, Part A. Further, the signature(s) below affirms that the LEA understands the intent and purpose of the use of Title I, Part A funds and will ensure the district managed activities will be implemented as proposed.
(a) Provide the signature and printed name of the Authorized LEA Representative below.

Signature of Authorized LEA Representative

Printed Name of Authorized LEA Representative

(b) If different from the Authorized LEA Representative, provide the signature and printed name of the LEA Title I Director below.

Signature of LEA Title I Director

Printed Name of LEA Title I Director

Email completed forms to consolidatedapplications@cde.state.co.us no later than June 30.

Where can I learn more?

- Title I, Part A Program Requirements: www.cde.state.co.us/fedprograms/ti/a
- ESEA Regional Contact: http://www.cde.state.co.us/fedprograms/consapp/index