



ASSOCIATION OF
SCHOOL BUSINESS OFFICIALS
INTERNATIONAL



MEMO to ESEA Reauthorization Conference Committee

To: Chairman Lamar Alexander, Chairman John Kline, Ranking Member Patty Murray, and Ranking Member Bobby Scott

Re: Title I Portability

From: AASA, the School Superintendents Association and ASBO, the Association of School Business Officials International

Date: September 30, 2015

As the ESEA Conference Committee begins meeting to negotiate key policy differences between the reauthorization bills that passed the House and Senate, AASA and ASBO want to highlight an issue that is of great importance to our members in the reauthorization of ESEA: the portability of Title I funding.

In September, we asked our respective memberships to explain how the inclusion of Title I portability provisions in ESEA would impact five aspects of their Title I programs: **planning, hiring and retention, administration, and the quality and equitable distribution of funds to students in the district.** The survey asked how Title I portability would play out in districts, and respondents agreed that portability would hamper their districts' ability to best serve their students. Over half of respondents agreed that difficulties would include uncertainty over student enrollment limiting the ability to pre-emptively provide targeted professional development prior to the school year (53 percent) and appropriately and equitably staffing schools (55 percent). Over half of respondents also agreed that Title I portability would limit or eliminate their ability to run school-wide Title I programs (52 percent) and target Title I dollars to the schools in greatest need (57 percent). The uncertainty surrounding Title I portability was most prevalent (80 percent) in terms of how allocations, which would be dependent on enrollment, would be unable to be finalized until after the start of the school year. Staffing, resources and programming would be influenced by portability; 57 percent suspected a limited ability to hire, 60 percent a reduced ability to offer school-wide programming, 62 percent a limited ability to preemptively target resources and 75 percent an uncertainty over staffing needs.

Respondents felt their ability to successfully plan and structure their Title I programs would be undermined by Title I portability provisions. . Overall, respondents offered similar impressions of the impact of Title I portability. In terms of program planning, one respondent answered, "Planning is the key to providing appropriate training in best instructional practices, and without certainty of resources the quality of educational services would greatly suffer. Another said

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The hiring and retention of teachers and paraprofessionals would be harmed by Title I portability. According to one respondent, “Over 90 percent of our Title I dollars are spent on teacher and paraprofessional salaries. If passed, Title I portability could possibly cause a reduction in force causing higher teacher-student ratios and reduction in services to the children in need.” Another said “We are a small district and even minimal changes in Title I funding have a significant impact on our ability to serve our students. The uncertainty of what our funding will be may inhibit us from hiring staff early in the summer which will cause us to lose the better candidates to larger districts. Title I is an expensive program to run, so adequate funding is essential so we can serve students to meet their individual needs and maintain a low student staff ratio.”

Title I portability would prove to be a great administrative burden, according to survey respondents, and lead to less dollars being spent on direct services for students. One business administrator said, “With Title I portability, we would retain more dollars to respond to enrollment patterns, pulling dollars out of direct student services and using them to track and administer the funds changing population distribution .” Several described the system that would be required to track Title I dollars under a portability schema as an “administrative [or accounting] nightmare” that would have detrimental effects on students in poverty. “Keeping up with the constant movement of children in poverty between schools and between school districts would require a full time staff position to keep track of students and the dollars that follow them,” one offered. Another added: “Programming options do not follow one child, but a group of children. The burden and time involved in tracking portability of title funds would reduce our ability to serve and increase administrative costs.” One superintendent asked, “What if a student moves to a non-Title I school, then back to a Title I school sometime during the year? A lengthy process would need to be created to track both the student enrollment and the funding amount.”

Title I funding is intended to enable districts to focus resources on improving the academic progress of students in poverty, but Title I portability would diminish the return on a district’s Title I investment. One respondent said: “The best use of Title I funding is to provide programs that support and assist students to improve academic achievement. Programs normally include a combination of staffing, materials, and services for specific supplemental services that are directed to students. If funds are connected to a specific student and not the services to support the student it becomes difficult to aggregate enough funding at a school level to provide the proper level of services.” Others voiced concern that Title I portability would delay connecting students to the services and

professionals they need in a timely manner. “Schools with a lower percentage of poverty students would struggle to identify and determine appropriate supplemental intervention strategies that are effective with the limited available funds. The longer it takes to identify and develop appropriate services, the less time educators will actually have to work directly with students to bring their skills up to expected levels.”

Title I portability would also make it more difficult for school leaders, boards, and state and federal agencies to determine the effectiveness of a district’s Title I program. “With portability, the funds would be dispersed across the district and diluted to the point that our schools could not determine if Title programs were positively impacting academic progress.” Another respondent added, “It would be a challenge to measure the effective use of funding for implementation of supplemental programs. We would need to devise a process to determine the impacts of smaller amounts of monies allocated to schools for the purpose of supplemental instruction or materials for Title I schools.”

There was significant concern by superintendents and business officials that Title I portability contradicted the intent of ESEA, which was to target funding to communities with high concentrations of students in poverty. There was broad consensus that reducing the equitable distribution of funds and services would be antithetical to the intent of the federal law: “Title I portability would take much needed dollars from the poorer schools that need the most funds to provide remediation , and allocate them to the places with 'less need' for these essential Title I funds. This would be making our 'most needy' students even more needy without the assistance Title I funds were intended to help.” Another respondent said “Portability on a ‘per child’ basis abandons the longstanding mandate to develop programs in qualifying attendance areas which are of ‘sufficient size, scope and quality’ to provide results for those in greatest need. Portability will be little more than a shotgun approach to both funding and services.” Another agreed, saying “Title I portability would negatively impact schoolwide programs, after-school programs, and the implementation of interventions which support students who are underperforming in literacy and mathematics.”

In light of this feedback from our respective memberships, AASA and ASBO urge ESEA Conferees to remove any and all Title I portability provisions from the Conference Report. Title I portability will not move the school-choice ball forward as it does not amend district enrollment patterns or boundaries or encourage districts to compete over Title I funds (since the Title I dollars the follow poor children are woefully inadequate). Instead, it fundamentally undermines the ability of school personnel to effectively administer their Title I programs, negatively impacting staff and students alike.