

Consolidating Title I-C Education of Migratory Children Funds into a Title I-A Schoolwide Program Guidance

Effective April 1, 2014

Overview

The Alaska Comprehensive Needs Assessment as revised in June 2025 recognizes that the guidance for Title I, Part C includes guidance for when Title I-C funds may be consolidated or combined in a Title I-A school operating a schoolwide program.

Section 1306(b)(4) of the statute and sections **200.29(c)(1)** and **200.86** of the code of federal regulations require schools to first use the Title I-C funds, in consultation with migratory parents, to meet the unique educational needs of migratory children before they may combine Title I-C funds in a Title I-A Schoolwide Program. ***The school also must document that these needs have been met before it may combine Title I-C funds in a Title I-A schoolwide program.***

Common Questions

What are unique educational needs for migratory students?

The State identifies the unique educational needs of migratory children on a statewide basis through its comprehensive needs assessment.

Who determines whether Title I-C funds may be combined?

The State provides guidance to schools regarding when it is appropriate to combine funds in a Title I-A schoolwide program. The school, in consultation with migratory parents, determines whether it may combine Title I-C funds in a Title I-A schoolwide program, subject to guidance from the State.

What does it mean to consolidate funds in a Title I-A Schoolwide Program?

A Title I-A school that operates a schoolwide program has developed a comprehensive schoolwide plan to improve the educational program for all students, and in particular must address the needs of all low-achieving students, including low-achieving migratory students. To consolidate or combine Title I-C funds in a schoolwide program can be done by actually combining Title I-C funds with Title I-A funds and possibly funds from other sources into one “schoolwide account” in which the funds lose their individual identity. Consolidation of funds may also be “conceptual” by identifying funds from sources such as Title I-A or the Title I-C program and using those funds to support any element of the schoolwide plan.

How can Title I-C funds be used to meet migratory students’ needs in a schoolwide school if the Title I-C funds are not combined to support the schoolwide plan?

Title I-C funds may be used to meet needs of migratory students (either academic or non-academic) by using them to provide direct services only to migratory students outside of the services the migratory students receive as part of the schoolwide educational program. For more information or assistance with this, contact the Title I-C Program Manager at the Alaska Department of Education & Early Development.

Steps to Consolidation

The State Needs Assessment Committee identified the following steps that must be taken before a school may consolidate Title I-C funds in a Title I-A Schoolwide Program:

1. Schools conduct a **local needs assessment** to determine if the unique educational needs of migratory students have been met. The following unique educational needs, identified by the committee as a result of the migratory lifestyle, were determined to be priority needs that must be met before consolidation of Title I-C funds:
 - Migratory students have a lower proficiency rate on state academic content assessments in **reading/language arts** than non-migratory students.
 - Migratory students have a lower proficiency rate on state academic content assessments in **math** than non-migratory students.
 - Migratory students are not **graduating** at the State target rate.
2. Schools must conduct a **Title I-C program parent meeting** annually to consult with parents regarding the unique educational needs of migratory students.
 - All migratory parents must be invited to the annual parent meeting (to be held at a time typically convenient to migratory parents) through a letter to eligible families or other communication consistent with school policies regarding notifications to parents.
 - A majority of parents attending the meeting must consent to the consolidation of funds into a schoolwide program.
 - Alternatively, if a school has in place a Title I-C program Parent Advisory Council that represents parents in matters pertaining to the education of migratory children, a meeting of the PAC may be used as consultation with migratory parents. Decisions should be made according to the PAC by-laws.
3. Schools **provide documentation to the State** showing that the identified migratory student needs have been met, that parents have been consulted, and that the school has decided to combine all or part of the funds from Title I-C.

Process, Timeline and Documentation for Consolidation of Title I-C Funds into a Title I-A Schoolwide Program

The district must submit **an Application to Consolidate Title I-C Funds in a Title I-A Schoolwide School** and supporting documentation for each school that is eligible to consolidate Title I-C funds into the Title I-A schoolwide program as part of its online Consolidated Application for ESEA Funds that includes the Title I-C subgrant. These applications are due no later than June 30 each year for the upcoming school year. The application form that will be required is provided with this guidance.

The Alaska Department of Education and Early Development (DEED) will provide data by early April to each district with schools that meet the pre-requisites for possibly consolidating Title I-C funds into a Title I-A schoolwide program. Data on the number of migratory PFS students in grades 3-9 enrolled in the school, proficiency rates for migratory and non-migratory students on the reading and math assessments, and the graduation rate information for migratory and non-migratory students will be provided from the most recently completed school year for use in the grant application for the upcoming school year.

Each school that wishes to consolidate Title I-C funds must use this data to determine if the migratory student needs have been met and if the school wishes to consolidate. The district must then ensure that **each school**

completes the *Application to Consolidate Title I-C Funds in a Title I-A Schoolwide Program* and must submit the application and required documentation with its Consolidated Application. Once a school has been approved to consolidate funds in a schoolwide program, the Application and supporting documentation will be submitted annually.

If the data made available to schools in April of a given year shows that a school did not meet one or more criteria in order to continue consolidating funds for the next school year, the school will be allowed to continue to implement the approved consolidation of funds for one more school year in order to 1) determine if the school meets the criteria to consolidate in the next year to avoid disruption of the Title I-C program, and 2) to have time to create a tentative alternate plan for targeted services to migratory students to be implemented in the succeeding school year. If the data provided the following April again shows that the school does not meet the criteria for consolidation, then the district will implement the alternative plan for providing targeted services to migratory students in that school rather than consolidating the Title I-C funds into the schoolwide plan.

Timeline

Timeframe	Action
April 2026	DEED provides each district with eligible Title I-A schoolwide schools data based on 2024-2025 assessments and graduation rates.
June 2026	<p>District completes an Application to Consolidate Title I-C funds in a Title I-A Schoolwide Program for each school eligible and desiring to consolidate and submits the plans along with supporting documentation to DEED for final approval of consolidation through the FY27 ESEA Consolidated Application.</p> <p><i>Note:</i> If the data made available to schools in April of a given year shows that a school did not meet one or more criteria in order to continue consolidating funds for the next school year, the school will be allowed to continue to implement the approved consolidation of funds for one more school year in order to</p> <ol style="list-style-type: none"> 1) determine if the school meets the criteria to consolidate in the next year to avoid disruption of the Title I-C program, and 2) to have time to create a tentative alternate plan for targeted services to migratory students to be implemented in the succeeding school year. <p>If the data provided the following April again shows that the school does not meet the criteria for consolidation, then the district will implement the alternative plan for providing targeted services to migratory students in that school rather than consolidating the Title I-C funds into the schoolwide plan.</p>
July 2026 – June 2027	District implements Title I-C application in Title I-A Schoolwide School as approved by DEED.

***The timeline continues as above for future school years.**