

# Title I Updates

## Administrative Procedures and Practices



Massachusetts Department of Elementary and Secondary Education  
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## Quarterly Updates

This is the second of a planned series of quarterly updates aimed at district staff responsible for overseeing district Title I programs. The goal of these updates is to provide you with both timely reminders of Title I-related responsibilities and guidance to help you meet those responsibilities, all in an easily accessible format. This second update spans the end of summer and beginning of the new school year. Our next update, in December, will focus on strategic and operational planning. We welcome your feedback regarding the usefulness and form of these updates.

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## Fiscal Issues

### FY09 Title I Grant Review and Approval

As of mid-September, approximately 300 districts have submitted FY09 Title I grant proposals. If your district has an FY09 Title I allocation but has not yet submitted its proposal, we encourage you to do so as soon as possible to ensure timely access to these FY09 funds.

Department staff members have been reviewing proposals since early August. If one of our staff has contacted you for corrections or clarification, please be sure respond carefully and promptly. We aim to approve all grants as quickly as possible and allow districts access to FY09 funds, but we need your assistance.

Our staff will notify your district via email once the district's grant application has been approved and sent to the Department's Grants Management office for processing.

### Transition from FY08 to FY09 Title I Grants

The FY08 federal grant period ended on August 31, 2008, though certain districts have applied for and received an extension of the grant period through September 30. All districts receiving FY08 federal Title funds must submit a final financial report ("FR1") within 60 days of the end of the grant period. For districts with an August 31 end date, the FR1 is due to Grants Management by **October 31**. Districts that extended their Title I grant end date must submit the FR1 by the end of November.

The Department will notify your district about the availability of FY08 "carryover" funds, if any, and the process for accessing those funds only after the FR1 has been submitted and reconciled.

Guidance regarding the use of Title I carryover funds is available here: [www.doe.mass.edu/titlei/fiscal/?section=carryover](http://www.doe.mass.edu/titlei/fiscal/?section=carryover). Complete details regarding standard grant management procedures, including submission of the final financial report are available here: [finance1.doe.mass.edu/grants/procedure/how\\_ma.html](http://finance1.doe.mass.edu/grants/procedure/how_ma.html).

PLEASE NOTE THIS  
IMPORTANT  
DEADLINE

## Fiscal Issues (Continued)

### Title I Grant Amendments

Districts must submit requests to amend grants when:

- there is any significant change in program objectives; or
- there is any increase or decrease in the total amount of the grant; or
- an increase in a line of the budget exceeds \$100 or 10% of the line (whichever is greater), or exceeds \$10,000.

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IMPORTANT  
INFORMATION  
REGARDING GRANT  
AMENDMENTS

As with the original grant proposal, Department staff are responsible for reviewing and approving Title I grant amendments. Our staff will notify your district of the need for additional information or changes, if necessary, and when the amendment has been approved and processed by the Grants Management office. To help facilitate an efficient review and approval process, please be sure to include in your district's amendment requests (both on the amendment cover sheet and in the "Purpose/Improvement Initiative" column of the amended budget workbook) details regarding proposed Title I amendments. We need to understand why you are proposing a change and how the change will improve the provision of Title I services; you can help us by answering these questions in advance.

Instructions for submitting Title I amendments and the necessary amendment forms are included in your district's FY08 and FY09 NCLB budget workbooks.

**FY09 Grant Amendments.** After all of your district's FY09 federal Title grant proposals have been approved, our staff will notify your district and upload a "final" approved FY09 NCLB budget workbook to your district's NCLB Coordinated Grant drop box in Drop Box Central in the Department's Security Portal. We expect that for most districts this "amendment-ready" budget will be available in late October.

IMPORTANT

Please be sure to check the 2008-09 accountability status for your district and Title I schools and amend your FY09 Title I budget accordingly. See page 3 for additional details on 2008 AYP reporting.

As always, if you have specific questions regarding your district's Title I grant that are not addressed here, please feel free to contact us at [titlei@doe.mass.edu](mailto:titlei@doe.mass.edu).

### FY09 Title I Comparability Reporting

Per federal law, districts may only receive Title I, Part A funds if they use state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that do not receive Title funds. When all schools receive Title I funds, districts must ensure that state and local funds are used to provide services that on whole are substantially comparable in each school. Demonstrating this comparability of services is an *annual* requirement for each district receiving Title I funds. Complete details are available in the federal non-regulatory guidance located here: [www.doe.mass.edu/titlei/fiscal/?section=supplement](http://www.doe.mass.edu/titlei/fiscal/?section=supplement).

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FY09 COMPARABILITY  
REPORTING

In FY07 and FY08, the Department required each Title I district to submit evidence related to comparability of services. This school year the Department will only require those districts undergoing an FY09 Title I program review (see page 4) to submit such evidence.

IMPORTANT

Please note, however, that this **does not** relieve districts of the annual obligation to demonstrate comparability. Whether your district is undergoing an FY09 Title I program review or not, your district must complete and keep on file FY09 comparability reports. Near the end of September, our School Business Services office, which oversees Title I comparability reporting, will provide all districts additional details about FY09 comparability reporting.

## 2008 MCAS & AYP Reporting

Districts have had an opportunity to preview their preliminary 2008 MCAS and adequate yearly progress (AYP) data since late August. On August 26, Commissioner Chester sent preliminary notice of school and district accountability status to superintendents, principals, and Title I directors. One of the primary purposes of that early notification was to ensure that districts with Title I schools identified are able to notify parents/guardians of children attending those schools of the availability of NCLB school choice prior to or at the beginning of the school year. A follow-up memorandum containing details regarding supplemental educational services (SES) was sent on September 10 to those districts required to offer SES this year.

On September 19, the Department publicly released its preliminary list of schools and districts identified for improvement, corrective action, and restructuring. Detailed school and district MCAS and AYP reports were published on the Department's website on September 24 (<http://profiles.doe.mass.edu>). Although the list released on September 19 is labeled preliminary, the AYP and accountability status data for most schools and districts will not change prior to release of final data in early October. The only potential changes may be to districts and schools that submitted AYP appeals and/or data discrepancies.

Details regarding 2008 AYP reporting, including lists of schools and districts identified for improvement, corrective action, and restructuring, and links to parent/guardian notification materials, are available at [www.doe.mass.edu/sda/ayp/2008](http://www.doe.mass.edu/sda/ayp/2008). Be sure to identify any changes to school or district accountability status that impact Title I resource allocation (e.g., required professional development, school choice or supplemental educational services set-asides) and amend your district's FY09 Title I budget accordingly.

For general questions regarding NCLB accountability, please contact us at [ayp@doe.mass.edu](mailto:ayp@doe.mass.edu). For questions specific to SES, please contact [sesproviders@doe.mass.edu](mailto:sesproviders@doe.mass.edu).

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*AMEND TITLE I BUDGET  
AS NECESSARY BASED  
ON ACCOUNTABILITY  
STATUS CHANGES*

## Title I Data Collection

### 2007-08 Data

Districts receiving federal funds are required to annually report details regarding how those funds were used to provide services. In our June Title I Quarterly Update, we notified you of the availability of the FY08 Title I Data Collection application. This online application replaced the paper-based Title I Performance and Achievement report of prior years. Data were due to the Department by August 31.

As of mid-September a small number of districts have yet to submit data on their 2007-08 Title I programs via this application. We notified these districts' Title I directors directly via email on September 15. If you work in one of these districts, please be sure to access the application and submit the data as soon as possible but before the end of September. Details regarding access to the application are available here: <http://www.doe.mass.edu/news/news.asp?id=4211>. If you have additional questions, please email [titlei@doe.mass.edu](mailto:titlei@doe.mass.edu).

*IMPORTANT REMINDER*

### 2008-09 Data

We plan to make the FY09 Title I Data Collection application and FY09 Supplemental Educational Services (SES) data collection tools available to districts in spring 2009. We strongly encourage you to use the current (FY08) data collection tools to help plan for FY09 reporting. Collecting data on Title I programs and services throughout the year allows you to track progress and make timely adjustments; it also eases the burden of end-of-year reporting.

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*COLLECTING DATA  
THROUGHOUT THE YEAR  
EASES THE BURDEN OF  
END-OF-YEAR  
REPORTING*

## District-wide Title I Preschool Programs

On August 21 we received guidance from the U.S. Department of Education clarifying their position on district-wide pre-kindergarten programs. The relevant text from that communication is below:

Under section 1112(b)(1)(K) of the Elementary and Secondary Education Act (ESEA), a district may reserve an amount from its total allocation to operate a Title I pre-school program for eligible children in the district as a whole or for a portion of the district. However, in reserving funds for district-operated preschool activities, a district must ensure that there are enough funds remaining to allocate to eligible school attendance areas or schools in accordance with section 1113 of ESEA so that the individual schools receiving an allocation can operate Title I programs of sufficient, size, scope, and quality to help students served by the program to achieve proficiency on challenging State academic achievement standards. *Therefore, as noted above, while a district may use a portion of its Title I funds for a district-wide pre-k program, it may not use its Title I funds to operate a preschool program only.*

If your district operates, or hopes to operate, a district-wide pre-k Title I program, please consider this information as you begin planning for FY10 activities.

The complete non-regulatory guidance on Title I preschool programs is available at [www.ed.gov/policy/elsec/guid/preschoolguidance.doc](http://www.ed.gov/policy/elsec/guid/preschoolguidance.doc).

## Title I Program Review / Monitoring

### 2008-09 Program Reviews

As in prior years, districts receiving Title I funds that are scheduled for a Coordinated Program Review (CPR) in FY09 will also participate in a Title I program review. You can view the full CPR schedule here: [www.doe.mass.edu/pqa/review/cpr/6ycycle.html](http://www.doe.mass.edu/pqa/review/cpr/6ycycle.html). Please direct any questions about the CPR process to your district's Program Quality Assurance (PQA) liaison or [compliance@doe.mass.edu](mailto:compliance@doe.mass.edu).

Later this fall we will send each district scheduled for an FY09 CPR official notice of and information about its Title I program review. Districts should expect to submit materials for Departmental review in the winter. In the meantime, please review the program review/monitoring resources posted at [www.doe.mass.edu/titlei/monitoring/](http://www.doe.mass.edu/titlei/monitoring/). These materials include guidance and sample materials that can help all districts ensure that they maintain appropriate documentation of their Title I programs. We will update these materials for 2008-09 over the coming weeks.

### 2007-08 Program Review Findings

Last winter and spring Department staff conducted desk-based program reviews of materials submitted by approximately 60 districts. While most districts provided evidence of appropriate Title I service provision, the review teams identified a number of areas for improvement that were common to multiple districts. Those areas are highlighted on the following page. As noted above, sample materials, guidance, and other resources are available at [www.doe.mass.edu/titlei/monitoring/](http://www.doe.mass.edu/titlei/monitoring/).

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IMPORTANT  
INFORMATION FOR  
DISTRICTS OPERATING  
TITLE I PRE-SCHOOL  
PROGRAMS

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TITLE I DISTRICTS  
PARTICIPATING IN FY09  
COORDINATED  
PROGRAM REVIEWS

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IMPORTANT  
INFORMATION FOR ALL  
DISTRICTS

## Title I Program Review / Monitoring (Continued)

### Areas for Improvement Identified through FY08 Program Reviews

Please review the following areas for improvement identified through the FY08 Title I Program Review process.

- **Supplement, not Supplant Policies and Procedures:** Each district must maintain a written supplement, not supplant policy, disseminate that policy to staff involved in providing Title I services, and ensure that all relevant staff understand the principle that Title I funds may only be used to supplement the state and local funds that would in the absence of Title I funds be spent on Title I-served children.
- **“Time & Effort” Documentation:** All districts receiving Title I funds are required to maintain auditable "time and effort" documentation that show how each Title I employee – whether fully or partially funded by Title I – spent his or her compensated time. Such documentation are written, after-the-fact (not estimated or budgeted) records of how the time was spent. Please review our sample materials at [www.doe.mass.edu/titlei/monitoring/](http://www.doe.mass.edu/titlei/monitoring/) for additional details.
- **Needs Assessment and Program Evaluation:** Districts must annually conduct (1) needs assessments and (2) program evaluations for each Title I-served school (both Schoolwide and Targeted Assistance programs). Only by collecting data, assessing needs, and evaluating programs for effectiveness can districts appropriately adjust their plan to use Title I funds appropriately and efficiently.
- **Program Plans:** Whether conducting Schoolwide or Targeted Assistance programs, districts must describe their plans for providing appropriate services. Specific areas for improvement that were common to multiple districts were:
  - Schoolwide program plans must indicate how the 10 required components of Schoolwide plans are addressed. In addition, Schoolwide plans should indicate how homeless students are being provided with appropriate services in Schoolwide programs.
  - Targeted Assistance plans should provide details regarding which students, in which grades, for which subject areas receive Title I services, as well as information about how those services are provided.
- **Parent/Guardian Communications, Policies, and Outreach:** Specific areas for improvement that were common to multiple districts were:
  - *Notice of parents/guardians right to know certain information about teacher qualifications.* On an annual basis, districts must notify all parents/guardians of children attending Title I-served schools of this right.
  - *Parent/Guardian Policies and School-Parent Compacts.* Districts must create, distribute, and regularly update parent/guardian policies and school-parent compacts for all Title I-served schools.
  - *Evidence of Parent/Guardian Outreach.* Districts must maintain evidence that each year Title I-served schools provide materials, training, and activities and conduct school-based meetings to help parents/guardians understand Title I services and how they can be involved with educators to monitor and improve their child's achievement. Meeting schedules, agendas, sign-in sheets with appropriate descriptions and dates can serve as forms of evidence.

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IMPORTANT  
INFORMATION

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VIEW SAMPLE  
MATERIALS AND OTHER  
RESOURCES AT:  
[WWW.DOE.MASS.EDU/  
TITLEI/MONITORING/](http://WWW.DOE.MASS.EDU/TITLEI/MONITORING/)

[Continued on following page.]

## Title I Program Review / Monitoring (Continued)

*[Continued from preceding page.]*

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IMPORTANT  
INFORMATION FOR ALL  
DISTRICTS

- **Student Selection Criteria:** Districts conducting Targeted Assistance programs must clearly describe how students are identified as needing Title I services. Student selection criteria should link to “rank-order” lists of students that identify the actual students screened for and served by Title I. The Department’s online sample materials provide detailed information regarding this important aspect of Targeted Assistance programs: [www.doe.mass.edu/titlei/monitoring](http://www.doe.mass.edu/titlei/monitoring).
- **Private School Outreach and Programming:** All districts receiving Title I funds that represent a city, town, or region must make offers of consultation to officials at private schools enrolling eligible Title I children who live within the district’s boundaries. After consultation and upon request by the private school officials, districts are required to provide eligible children attending private elementary and secondary schools, their teachers, and their families with Title I services or other benefits, such as professional development, parent involvement, or materials and supplies (on loan from the public schools), that are equitable to those provided to eligible public school children, their teachers and their families. Districts must maintain written evidence of all offers of consultation to private school officials as well as signed affirmation from participating heads of private schools that the district consulted with them during the program planning process.

As noted at the beginning of this section, the areas for improvement listed above were identified through the FY08 Title I Program Review process. If you have additional questions or comments after reviewing the sample materials, guidance, and other resources on the Department’s Title I website ([www.doe.mass.edu/titlei/monitoring/](http://www.doe.mass.edu/titlei/monitoring/)), please contact us at [titlei@doe.mass.edu](mailto:titlei@doe.mass.edu).

## Supplemental Educational Services (SES)

In early September we sent a memorandum to all districts required to offer supplemental educational services (SES) in 2008-09 as a result of one or more district Title I schools being identified for improvement – year 2, corrective action, or restructuring. In addition to the information provided in that memorandum, here are a few general tips and reminders for districts that are preparing for SES programs:

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FOR DISTRICTS  
REQUIRED TO OFFER SES

- Contact the SES providers authorized to provide SES in your district to ensure their availability and willingness to provide services.
- Schedule an "open house" for SES providers to inform parents/guardians about the services they provide.
- In your district’s notice to the parents/guardians of all low income children in the identified school(s), include information about the availability of SES providers, description of their services, hours of instruction, type of instruction, and location of services.
- Establish a reasonable deadline (approximately four weeks) within which parents/guardians must select providers.
- Ensure that both providers and district administrators agree on the details of contracts/agreements.
- Inform school building staff of the purpose of SES, provide them logistical support, and ensure that all parties understand the requirement that parents/guardians (not principals or other staff) select the service providers.

## SES (Continued)

- If, after the deadline for selecting providers has closed and more low income students would like to participate in the SES program than there are available slots, rank students by educational need and select the academically neediest students for services.
- Collect information from providers about the curriculum and methods of assessment to be used, as well as the frequency of progress reports.
- Collect confirmation from providers that all tutors have "passed" criminal record checks.
- Collect copies of providers' liability insurance.
- Work with providers and in consultation with parents to develop individual educational plans that will address the "specific" academic needs of students, including such information sources as MCAS or other assessment results and existing individual student plans.

Please visit the Department's SES website for additional resources and information regarding supplemental educational service programs: [www.doe.mass.edu/ses](http://www.doe.mass.edu/ses). As always, please feel free to contact our staff at [sesproviders@doe.mass.edu](mailto:sesproviders@doe.mass.edu) if you have particular questions or concerns.

## Fall Technical Assistance Session

We are currently planning for a "drive-in" fall Title I technical assistance session that will cover a variety of topics and be open to all Title I districts. We will notify you in the next few weeks of the date, location, and other event details.

## Contact Information

Please visit the Department's Title I website for comprehensive resources, including sample materials, related to Title I program administration: <http://www.doe.mass.edu/titlei/>.

When you have specific questions or concerns, please feel free to contact us.

For Title I-specific questions: [titlei@doe.mass.edu](mailto:titlei@doe.mass.edu) / 781-338-6230  
For AYP or accountability-related questions: [ayp@doe.mass.edu](mailto:ayp@doe.mass.edu) / 781-338-3550  
For SES-specific questions: [sesproviders@doe.mass.edu](mailto:sesproviders@doe.mass.edu) / 781-338-6328

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*HOW TO CONTACT THE  
DEPARTMENT*