Introduction

The goal of this update is to provide you with timely reminders of your responsibilities under Title I and guidance to help you meet those responsibilities. This update spans the end of the 2011-12 school year. It also looks ahead to some of the changes that will occur as a result of Massachusetts’ ESEA/NCLB Flexibility Waiver, which will take effect beginning in the 2012-13 school year.

Note that this update corresponds approximately to the activities described on page 9 of the Handbook for Title I Directors posted at www.doe.mass.edu/titlei/handbook.html.

As always, your feedback regarding the usefulness of these updates is encouraged.

ESEA/NCLB Flexibility Update

During the last week of April and the first week of May, ESE staff held five regional information sessions and two webinars for district staff to discuss changes to Massachusetts' school and district accountability system that stem from approval of our state's federal ESEA/NCLB flexibility waiver. Highlights include:

- The NCLB goal of 100 percent proficiency by the year 2014 is replaced by the new goal of reducing proficiency gaps by half by 2017.
- NCLB Accountability Status labels (improvement, corrective action, restructuring) are eliminated. Instead, districts and schools will be assigned a level from 1-5 indicating their placement on the Framework for District Accountability and Assistance.
- AYP is replaced with a new measure (the Progress and Performance Index, or PPI) that incorporates student growth, graduation and dropout rates, and indicators related to improving performance at the Warning/Failing and Proficient levels on the MCAS. Science will also be included in the new measure.
- The lowest 20 percent of schools will continue to be placed in Level 3 relative to other schools in their grade spans; however, some schools will be placed in Level 3 if one or more student groups are among the lowest performing subgroups statewide. In addition, a school’s movement between Level 1 and 2 will be based on the performance of the aggregate and/or the high needs group – an unduplicated count of students who are low income, have a disability, and/or are English learners.
- Districts will have the ability to transfer up to 100 percent of Title II, Part A funds into Title I, Part A after Title II-A private school participation obligations have been met. To that end, we will be consolidating the FY13 Title I and Title II-A budget workbooks to promote coordination of these resources to best meet districts’ needs.
- Most significantly for Title I programs, the one-size-fits-all requirements of NCLB public school choice, SES, and professional development are replaced by supports and interventions that districts select in response to identified needs. While some districts will continue to direct funds to interventions and supports, the waiver gives each district more flexibility in choosing the most appropriate method of providing supplemental support to the district’s lowest-achieving students, either through allocations directly to schools, a district reservation, or both.

Additional information about the waiver is available at www.doe.mass.edu/apa/titlei/default.html.
FY12 Fiscal Issues

Final FY12 Title I Allocations & End of Year Grant Procedures

In a March 6, 2012 memorandum and via webinars on March 8th and 9th, we provided important information about final adjustments to FY12 Title I allocations and important reminders about end-of-year grant procedures. The memorandum is posted at: http://www.doe.mass.edu/titlei/grants/memoPartAallocation.html.

<table>
<thead>
<tr>
<th>Date</th>
<th>Event</th>
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<tr>
<td>July 20-31, 2012</td>
<td>Final drawdown period for payments on all FY12 Title I grants</td>
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<tr>
<td>July 31, 2012</td>
<td>Waiver request to extend end date for FY12 Title I grant to September 30, 2012 (if applicable)</td>
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<tr>
<td>July 31, 2012</td>
<td>Line item amendments due for FY12 Title I grants ending August 31, 2012</td>
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<tr>
<td>August 31, 2012</td>
<td>End date for FY12 regular Title I grants</td>
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<td>September 30, 2012</td>
<td>End date for districts receiving extensions of Title I grants.</td>
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<tr>
<td>October 31, 2012</td>
<td>Final Financial Report (FR-1) due to Grants Management (for grants ending 8/31/2012)</td>
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<td>November 30, 2012</td>
<td>Final Financial Report (FR-1) due to Grants Management (for grants ending 9/30/2012)</td>
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FY12 Budget Reconciliation and Spending Projections

As discussed in our March 6 memo and subsequent web conferences, spring is the time to take account of your district’s current year Title I budget and spending, consider expenses and planned expenditures for the remainder of the fiscal year, plan for any carryover of FY12 funds into FY13, if needed, and amend your current year budget accordingly.

Please note that a district expecting to have a relatively small amount of FY12 Title I funds remaining at the end of August, but that will be able to spend that remainder by the end of September, may request an extension of the FY12 Title I grant until September 30, 2012.

Time and Effort Records

Issues related to the collection and maintenance of “time and effort” records consistently results in program review/audit findings for school districts. As a reminder, please keep the following in mind:

The district must maintain such records for all personnel funded through Title I funds. For personnel who are partially funded through Title I funds, the district is required to collect signed records on a monthly basis. Personnel who are fully funded through Title I funds, on the other hand, are required to sign records on a semi-annual basis (twice a year). By this time you should have collected, or should be in the process of collecting, the first set of signed semi-annual certifications for this school year.
FY12 Fiscal Issues (Continued)

Documentation of stipends paid to staff can be recorded with semi-annual certification or monthly reports, whichever is utilized for the particular employee. Alternatively, permitted documentation includes (1) a signed supplemental contract that stipulates Title I work activity, (2) sign-in attendance logs approved by the supervisor (e.g., pay for professional development activities), and/or (3) employee time/pay slips that specify "Title I" and are approved by the supervisor.

FY13 Fiscal Issues

Preliminary Information Regarding FY13 Title I Allocations

We have received preliminary information from the U.S. Department of Education (ED) estimating that Massachusetts should anticipate a reduction in its statewide Title I, Part A allocation for the 2012-13 school year of approximately 3.9 percent as compared to the 2011-12 school year. This anticipated decrease stems from a decline in our state’s share of the national poverty rate, based on the 2010 Census data that are used by ED to generate FY13 Title I allocations.

We do not expect to receive final Census and allocation data from ED until June, and are unable to answer questions regarding individual district amounts at this time. We do know, however, that the impact of this estimated reduction will be variable at the individual district level. Additional information is located in the March 6 memorandum located at www.doe.mass.edu/titlei/grants/memoPartAallocation.html.

We appreciate your patience as we work to be as prompt and accurate as possible in providing information about these federal awards. We will notify you as soon as final information on allocations is available. Until that time, we cannot answer district-specific questions regarding FY13 Title I allocation amounts.

Earlier Deadline for FY13 Title I Grant Application Submissions

The submission deadline for FY13 Title I grants will be November 1, 2012, two months earlier than the deadline of December 31 used in recent years. We are changing the deadline to allow us to determine mid-year adjustments to district allocations sooner, and thus allow districts more time to plan for and use final allocation amounts.

ESEA/NCLB Flexibility Waiver – Use of Funds

Beginning in the 2012-13 school year, a district with any Title I school in Level 2-4 of the Framework for District Accountability and Assistance will be obligated to spend a portion of the district’s Title I, Part A allocation on interventions and supports that address the needs of the district’s lowest-achieving students in its lowest-performing schools, either through allocations directly to schools, a district reservation, or both:

- A Level 2 district must spend up to 20 percent for interventions and supports for Level 2 schools (on a sliding scale determined by ESE);
- A Level 3 district must spend at least 20 percent to support Level 2 and Level 3 schools;
- A Level 4 or 5 district must spend at least 25 percent to support Level 3 and 4 schools.

The district will assess its needs using the State’s Conditions for School Effectiveness as the lens for that analysis, taking into consideration multiple sources of data, including the findings of the district’s needs assessment and/or program evaluation. Districts are encouraged to prioritize interventions and supports closest to the instructional core. The district will propose how it intends to use Title I funds for interventions and supports through the FY13 Budget Workbook; Level 3 districts must seek the consultation of the District and School Assistance Center (DSAC) prior to submitting the workbook to ESE.
FY13 Fiscal Issues (Continued)

FY13 Title I and Title II-A Grant Application

Beginning with FY13, the budget workbook used for Title I purposes will be consolidated with Title II-A. The ESEA/NCLB flexibility waiver allows a district to transfer up to 100 percent of its Title II, Part A funds into Title I, Part A, after Title II-A private school participation obligations have been met. Providing both applications in one workbook is meant to promote coordination of these resources to best meet districts’ assessed needs and to make it easier to take advantage of the extended transfer flexibilities.

FY12 Title I Program Review Update

We would like to thank all districts scheduled for an FY12 Title I Program Review for submitting their documentation for desk-based review. In addition, we are in the process of conducting on-site visits in a select number of districts to provide context for the desk-based reviews and to better collect data about local practices and needs. Districts participating in on-site visits were notified in November.

We expect to finalize these reviews later this spring and notify you of findings and required actions, if any, at that time.

Non-Public School Outreach and Consultation

Each year districts are required to notify officials from private schools where eligible students attend of the opportunity to receive Title I services. Services include extra academic support for eligible students, related professional development for their teachers, and capacity-building support for their families. These must be equitable to those provided to eligible public school children, their teachers, and their families. We have prepared a Sample Letter of Notification to Private Schools to assist you in performing this outreach to all private schools that enroll eligible resident students, whether the schools are located within or outside of district boundaries. The sample letter is available at: www.doe.mass.edu/titlei/students/?section=private.

Your district is also required to obtain written affirmation that timely and meaningful consultation has occurred with officials from each private school that has elected to participate in the district’s Title I program in SY2012-13.

To document that this consultation has occurred, we have prepared a form titled, Affirmation of Consultation with Participating Private Schools. One copy of this form must be submitted to ESE with the district’s FY13 Title I grant application for each private school in which the district will provide Title I services in SY2012-13.

Technical Assistance and Networking Opportunities

We are pleased to offer regional technical assistance and networking meetings for Title I Directors on topics of importance to you. These meetings, which are held periodically throughout the year, are hosted by local Title I Directors.

If you would like to add items to the agenda, be sure to let your host know when you receive an invitation via email. The next series of meetings will be held in late May/early June. Do not hesitate to contact us at titlei@doe.mass.edu with any questions.

Other networking opportunities are available at http://www.doe.mass.edu/titlei/network.html.

We will provide an FY13 version of this form along with FY13 Title I application materials later this spring.
District personnel with the Title I Grant Application Drop Box security role can access the application. The Directory Administrator in your district assigns this role. A list of Directory Administrators in each district is available at www.doe.mass.edu/InfoServices/data/diradmin/list.aspx.

Title I Data Collection

Title I directors were notified of the availability of the FY12 Title I Data Collection Application on the Security Portal and the timeline for submitting these data to ESE in a March 7, 2012 memorandum: www.doe.mass.edu/news/news.aspx?id=6722.

All districts receiving Title I funds must report data at the district and school level; districts required to offer supplemental educational services (SES) must also provide information on student participation, attendance, and achievement in SES, if applicable.

- External providers must submit student achievement information to the district upon the completion of each student’s learning plan or by August 15, 2012, whichever comes first.

- Districts must submit Title I data, including SES student-level information, if applicable, via the Security Portal no later than August 31, 2012.

Provider contracts with the State as approved SES providers are valid through August 31, 2012; districts and providers must honor all outstanding contracts/agreements regarding the provision of SES, including the requirement that external providers submit achievement data to districts once those services end.

Preparing for the Upcoming School Year

NCLB School Choice and Supplemental Educational Services (SES)

As stated previously, beginning with the 2012-13 school year the one-size-fits-all requirements of public school choice, SES, and professional development will be replaced by supports and interventions districts select in response to identified needs. Consequently, Massachusetts’ SES program will be discontinued after the 2011-12 school year. A district may choose to offer SES or tutoring services in general, but they may do so on their own basis and terms.

- Districts choosing not to continue offering SES or school choice in 2012-13 must provide parents with information to explain why and describe the interventions, incentives and supports that will replace those options.

- Any student who has transferred into a school through NCLB choice must be allowed to remain in that school through the highest grade served by the school; the district’s obligations to fund transportation for such students now reverts to state law and local transportation policies.

Coordinating Services with Neglected/Delinquent Facilities

Some districts receive grants on behalf of children in Neglected/Delinquent community residential facilities (Title I, Part D Subpart 2 grants) within the district’s geographic boundaries. This is a reminder that all Title I, Part D Subpart 2 grant recipients must establish and have on file at the facility and in the affiliated school district a ‘formal agreement’ as required by the U.S. Department of Education. The formal agreement spells out the programmatic and fiscal agreement between the facility and the school district, with the latter acting as fiscal agent for grant funds. Spring is an appropriate time to review current agreements with local Neglected/Delinquent facilities and collaborate with them to establish agreements for the upcoming school year.

Online Family Engagement Resources

Involving parents, guardians and families as full partners in the education of their children is a cornerstone of the Elementary and Secondary Education Act (ESEA). When families support learning, children are more successful in school and school success helps children become successful adults.

Visit http://www.doe.mass.edu/titlei/parents.html for an updated list of links and resources.
The Program Evaluation/Needs Assessment: Reducing Duplication & Unnecessary Burden

The Federal law requires districts to annually evaluate the impact of the district’s Title I program on student outcomes and family engagement. In addition, the end of the school year is a good time to review its services for private school students and teachers, homeless students, and the district’s coordination of Title I services with local neglected and delinquent facilities, if appropriate.

One of the goals of ESEA/NCLB flexibility is the reduction of duplication and unnecessary burden. For example, districts are encouraged to use the State’s research-based Conditions for School Effectiveness (CSEs) as a frame for evaluating the efficacy and impact of all district initiatives, especially the district’s system of support and intervention for its lowest-performing schools. Generally speaking, a thorough review of the CSEs in the district’s Title I schools can take the place of the Title I program evaluation and/or needs assessment requirements.

A CSE self-assessment instrument is available at [http://www.doe.mass.edu/apa/general/](http://www.doe.mass.edu/apa/general/). Other resources more specific to Title I programming are available at [http://www.doe.mass.edu/titlei/monitoring/](http://www.doe.mass.edu/titlei/monitoring/).

Title I Calendar at a Glance

**May**

Submit requests to amend FY12 grants, as needed.
Collect signed Time & Effort records for split-funded staff.
Conduct program evaluation & write a summary of that evaluation.
Conduct needs assessment based on findings of program evaluation.
Begin outreach to private school leaders of schools that eligible students attend.

**June**

Submit requests to amend FY12 grants, as needed.
Collect semi-annual certifications (2 of 2) for Title I personnel whose compensation is funded solely from Title I.
Collect signed Time & Effort records for split-funded staff.
Review & update supplement, not supplant policy & procedure, if needed.
Review & update district parent / guardian involvement policy based on data (e.g., evaluations).
Review & update school - parent/guardian compact.
Prepare and submit FY13 Title I and Title II-A grant application.

Spotlight: Using Title I Funds to Implement High-Quality Preschool Programs

In April, the US Department of Education (ED) issued updated guidance on using Title I, Part A funds to implement high-quality preschool programs. According to Acting Assistant Secretary Michael Yudin:

“Research demonstrates that the years prior to kindergarten are the most significant in shaping a child’s foundation for success in school and in life. Without sufficient early learning experiences upon which to build a strong foundation, the achievement gaps - too often experienced by children with high needs, such as those who are from low-income families, are learning English, or have developmental delays or disabilities - may start long before children reach kindergarten. In addition, high-quality preschool programs supported with Title I funds can help ensure that children have the foundation they need to meet early learning and development standards and experience success throughout elementary and secondary school, and beyond.”

Federal Non-Regulatory Guidance: Serving Preschool Children Through Title I, Part A of the Elementary and Secondary Education Act of 1965, as Amended:

For NCLB/ESEA flexibility waiver questions: ESEA@doe.mass.edu / 781-338-3550
For Title I questions, including Title I data collection: titlei@doe.mass.edu / 781-338-6230
For SES-specific questions: sesproviders@doe.mass.edu / 781-338-6328