Introduction

The goal of the quarterly update is to provide timely reminders of district responsibilities under Title I and guidance to help Title I directors meet those responsibilities. This update spans the middle of the 2014-15 school year. As always, we welcome your feedback regarding the usefulness of these updates. Please feel free to contact us at titlei@doe.mass.edu or 781-338-6230.

This update corresponds to the activities described on page 6 of the Handbook for Title I Directors.

Fiscal issues

Preparing for FY16: Providing evidence of desired impact on practices and outcomes

Background

Massachusetts’ approved ESEA (NCLB) flexibility request has provided districts with the opportunity to assess local needs and allocate Title I, Part A funds accordingly to support the district’s lowest-achieving students in its lowest-performing schools. The expectation is that districts engage in a cycle of continuous improvement by collecting evidence each year to assess the impact and efficacy of district and school initiatives on professional practice and student outcomes, and using that information to inform resource allocation decisions the following year. You will be asked to report on evidence of impact of Title I-funded activities in your district’s FY16 Title I grant application, similar to the reporting that was required in the FY14 and FY15 application to show impact of continued activities.

What to do now

All districts: Continue documenting the impact that Title I-funded activities have had on practices and outcomes this school year. Reference your district’s responses to Question 1 in your FY15 Title I grant application.

Level 3 & 4 districts: In addition to documenting impact as described above, review current Title I-funded activities in relation to the early evidence of change (e.g., after six months) your district anticipated. Regional Assistance Directors from the District and School Assistance Centers (DSACs) and Level 4 district liaisons will be consulting with Level 3 & 4 district staff again this year to help guide effective use of next year’s (FY16) funds for interventions and supports; the evidence you collect will be part of that consultation.

FY16 grant applications

As part of the FY16 Title I grant application, ESE will ask districts classified into Level 2, 3, 4, or 5 – and thus required to spend a prescribed portion of their Title I allocation for interventions and supports to address the needs of low-achieving students in low-performing schools – to provide evidence of the impact FY15 activities had on practices and outcomes.
Fiscal issues (continued)

We recognize that a cycle of continuous improvement takes into account multiple years. To that end, FY16 district reservations for interventions and supports will be tied to the district’s FY15 (SY2014-15) accountability and assistance level. We expect this will assist districts in budget planning for next year. As was the case last year, the district reservation percentage will remain fixed even if the district moves to a higher accountability and assistance level between the 2014-15 and 2015-16 school years. By contrast, required NCLB reservation amounts were often not established until the release of accountability data in late summer.

Revised FY15 Title I allocation amounts

In the next few weeks we will notify Title I directors of revised Title I allocations for the current school year that incorporate all required adjustments to initial allocations. Districts that had planned to submit an amendment in the near future may either continue to do so or wait until we have released revised allocations.

Preliminary FY16 census data

The federal Census Bureau has released preliminary poverty and population data for Massachusetts school districts that, once finalized, will be used to calculate school year 2015-16 Title I, Part A district allocations. We shared this data with Title I directors in a memo dated February 11. A strong indicator of change in a district’s Title I allocation from year to year is change in the district’s federal census estimates. Please note that census data are imperfect: they are not available for charter school or regional vocational school districts, and ESE must adjust federal census estimates for all districts to calculate Title I allocations for charters and regional vocational schools. The final census data, including data for charter schools and regional vocational schools, will be published when SY2015-16 Title I allocations are released later this summer.

Overdue FY13 final financial reports (FR-1)

In a memo dated March 6, 2015, ESE’s Grants Management Office notified superintendents of districts that have not yet submitted the final financial report (FR-1) for the FY13 Title I grant and/or Title IIA grant. The final reports are always required to be submitted no later than sixty (60) days from the end date of the grant. For grants with an end date of September 30, 2014 the FR-1(s) were due by November 30, 2014. Those with end dates of June 30, 2014 were due by August 31, 2014. If your superintendent received the notice from Grants Management, your district’s final report is overdue and must be submitted by March 31, 2015 or FY15 funds may be withheld. Please check with your business manager to ensure that the FR-1 is completed and submitted to Grants Management. If you have questions regarding the FR-1, please contact Grants Management directly: Susan O’Brien at 781-338-6572 or Victoria Munoz at 781-338-6595.

Budget reconciliation and spending projections

To ensure accurate record keeping and appropriate expenditure of funds, we encourage you to reconcile your records with those of your business manager on a monthly basis. Now that you are past the halfway point of your program year, this is a good time to revisit spending plans, make financial projections, and begin planning for any carryover from FY15 year 1 into year 2 of the grant, if needed.
Fiscal issues (continued)

Title I grant amendments
As a reminder, 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 and 10% of the line, or exceeds $10,000.

As with the original grant proposal, ESE staff are responsible for reviewing and approving Title I grant amendments. We 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 request 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.

Be sure to use an amendment-ready workbook when filing an amendment. Retrieve the workbook from the security portal, in the ‘Title I and Title IIA Grants’ drop box located in drop box central, with the word ‘final’ or ‘amendment ready’ (if an amendment has been filed previously) at the end of the file name.

Time and effort records
Districts are required to maintain "time and effort" records for all personnel funded in any amount with Title I funds. For personnel who are partially funded through Title I funds, you are 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 the first set of signed semi-annual certifications for this school year.

Updated guidance released by the U.S. Department of Education allows for semi-annual certifications for certain staff who are funded through multiple sources (split-funded) or on multiple activities, but maintain a consistent work schedule. The certification must (1) cover a semi-annual period (e.g., September-January and February-June, or September-February and March-August), (2) identify Title I as the program, and (3) be signed and dated by the employee or supervisor. Districts choosing to use this system must complete and keep on file an Annual Management Certification form certifying that only eligible employees will participate in the substitute system and that the system used to document employee work schedules includes sufficient controls to ensure that the schedules are accurate. See our website for more information and sample time and effort templates.

Record stipends for stipended staff on semi-annual certifications 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 (3) employee time/pay slips that specify "Title I" and are approved by the supervisor.
**FY15 Title I program review update**

We would like to thank all districts scheduled for an FY15 Title I program review for submitting their documentation. In addition to documentation reviews, we are 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 the summer.

We expect to finalize FY15 reviews this spring and will notify you of findings and required actions, if any, at that time. Title I program reviews, conducted every six years, provide the Department with information about the implementation of your district’s Title I programs. To see if your district is scheduled for an FY16 Title I Program Review, visit the Coordinated Program Review schedule on our website.

**Coordination 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. The allocation for an N or D facility appears on line item 6 of the Title I grant. 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 copy of the grant application as well as 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.

**ESEA flexibility waiver renewal**

The U.S. Department of Education has offered Massachusetts the opportunity to apply for a three-year renewal of our state’s Elementary and Secondary Education Act (ESEA) flexibility waiver. The waiver provides relief from certain aspects of existing federal law and enables the implementation of a unitary school and district accountability and assistance system that meets both federal and state requirements. The Massachusetts Department of Elementary and Secondary Education (ESE) plans to submit its renewal application by the end of March 2015. If approved, the state’s ESEA flexibility waiver will be extended through the end of the 2017-18 school year.

As part of the proposal, ESE has been gathering feedback from stakeholders in the field. This is being done through a series of focus groups with school and district administrators, teachers, members of the Title I Committee of Practitioners, and others. We also welcome written feedback and comments via email. Through the focus groups and written feedback, ESE has sought stakeholder input on the following questions:

- Are we identifying the right schools and districts for accountability and assistance?
- What additional or alternative measures should we consider when making district and school accountability determinations?

Please send comments to esa@doe.mass.edu. Visit our website for more information on the ESEA flexibility waiver.

**Training and networking opportunities**

The spring Title I statewide conference is scheduled for June 1st, 2015 at the Best Western Royal Plaza Hotel in Marlborough. Registration and further information will be available closer to the session date.

Information on other networking opportunities is available on our website.
Title I calendar at a glance

**February**

Communicate with business office regarding any FY14 year 2 funds unspent and check on spend down of FY15 funds at half way point in grant year.

Submit requests to amend grants, as needed.

Collect signed time & effort records for split-funded staff.

Coordinate with early childhood centers to plan transition of preschool students.

Collect semi-annual certifications (1 of 2) for Title I personnel whose compensation is funded solely from Title I (if not collected in January).

**March**

Submit requests to amend grants, as needed.

Collect signed time & effort records for split-funded staff.

Consult with eligible private schools & obtain affirmation of consultation with participating private school officials.

Coordinate services with local neglected or delinquent facilities (if applicable).

Use available data (e.g., free & reduced lunch, other low-income data, or a combination of poverty indicators) to determine eligible schools for Title I services for next school year.

**April**

Submit requests to amend grants, as needed.

Collect signed time & effort records for split-funded staff.

Begin collecting Title I data for submission via the Department’s Title I Data Collection Application on the ESE Security Portal in August.

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**Spotlight on:**

National Title I Conference

In February the National Title I Association held its annual conference in Salt Lake City, Utah. With the Title I program celebrating its 50 year anniversary, the conference highlighted President Lyndon Johnson’s legacy and the circumstances that led to the law’s passage in 1965. The National Title I Association does a great job posting materials from its conferences, including videos, on its website. We recommend taking a look. The 2016 conference will be held in late January in Houston, Texas.

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For questions about the contents of this update or more generally about Title I: titlei@doe.mass.edu / 781-338-6230

For accountability-related questions: ese@doe.mass.edu / 781-338-3550