Maintaining documentation & preparing for a program review

Title I Technical Assistance Session
School Improvement Grant Programs
October 19, 2012

Massachusetts Department of
ELEMENTARY & SECONDARY
EDUCATION
Session goals

★ Provide overview of key documents required for Title I
★ Identify resources and sample materials
★ Provide a way to organize key Title I documentation
★ How to submit program review materials
★ Relieve anxiety regarding Title I program review process
Title I program review – dimensions

⭐ Fiscal procedures
⭐ Parent/guardian communications
⭐ Program design and evaluation
⭐ Data collection and management
⭐ Opportunity and equal educational access
Fiscal procedures

- Comparability procedure and demonstration
- Supplement, not supplant policy and procedures
Fiscal procedures

Districts are required to use district funds to provide educational services in Title I schools that are comparable to the services provided in non-Title I schools. Districts must ensure compliance with all comparability requirements, including establishing and implementing: (a) a local educational agency-wide salary schedule; (b) a policy to ensure equivalence among schools in teachers, administrators, and other staff; and (c) a policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

On this Page:

Carryover
Comparability
Data Collection
Ed-Flex Waivers
Maintenance of Effort
Preschool Programs
Program Evaluation
Schoolwide Programs
Supplement, Not Supplant
Targeted Assistance Programs
Time & Effort Reporting

Comparability of Services

Instructions for Demonstrating Comparability

Federal Non-Regulatory Guidance on Fiscal Issues: Maintenance of Effort; Comparability; Supplement, not Supplant; Carryover & Consolidating Funds in Schoolwide Programs

Comparability (PowerPoint from October 6, 2011 Title I Technical Assistance Session)

Comparability Determinations & Reporting (PowerPoint from October 5, 2010 Title I Technical Assistance and Networking Session)

FY12 Title I Comparability Documentation - Traditional Forms
FY12 Title I Comparability Documentation - Automated Forms (Recommended)
Parent/guardian communications

- District and school parent/guardian involvement policies
- School-parent/guardian compacts
- Documentation of parent/guardian outreach and involvement
- Report cards and right-to-know
Every six years, each school district in the Commonwealth is scheduled for a Coordinated Program Review of state and federal programs. Districts receiving Title I funds undergo a Title I program review in the same year they are scheduled for a Coordinated Program Review. The information below is arranged for the purpose of collecting & organizing documentation for program reviews; however, even if a district is not scheduled for a program review they may be of assistance in operating an effective Title I program.

On this Page:
- ESE Program Review
- ESE Communications & Findings
- Federal Program Review

2011-12 Program Review Materials
- 2011-12 Title I Program Review Manual
- How to Organize & Submit 2011-12 Materials for Review by ESE Staff
- FY11 Title I Common Program Review Findings (PowerPoint from May 23, 2011 Title I Technical Assistance Session)
- Downloadable Samples - All Sections (ZIP Archive File)
- Downloadable Samples - Fiscal Procedures (ZIP Archive File)
- Downloadable Samples - Parent/Guardian Communications (ZIP Archive File)
- Downloadable Samples - Program Design & Evaluation (ZIP Archive File)
- Downloadable Samples - Data Collection & Management (ZIP Archive File)
- Downloadable Samples - Opportunity & Equal Educational Access (ZIP Archive File)
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.
Program design and evaluation

- Needs assessment procedure
- Program evaluation procedure and summary
- Schoolwide program plan (SW programs only)
- Targeted assistance program plan (TA programs only)

Massachusetts Department of Elementary and Secondary Education
Program design and evaluation

Title I program evaluations are conducted at the end of a program year and are intended to measure the efficacy and impact of the district's Title I program. All aspects of the Title I program must be included in evaluation of its impact, including academic assistance provided, parent/guardian involvement activities and effectiveness of related policies, and private school services (if applicable). Evaluation data, such as periodic and summative student assessment data and staff and parent/guardian surveys, are used to evaluate the strengths and weaknesses of the program's impact on raising student achievement and productively involving parent/guardians in their children's education.

Program Evaluation

- Program Evaluation Procedure
- Program Evaluation Summary (Updated annually by the district)
Data collection and management

- Title I personnel lists
- Time and effort records
- Student selection procedure (TA programs only)
- Student selection criteria (TA programs only)
- Rank ordered lists (TA programs only)
Data collection and management

All employees, including teachers, paraprofessionals, and other staff paid with federal funds must document the time and effort they spend within that program. The portion of the federally-paid salary should reflect the time and effort the individual has put forth for that federal program.

Semi-annual certifications are required for Title I personnel whose compensation is funded solely from the Title I grant. These certifications document that he/she has been working solely in activities supported by the Title I grant. 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 and supervisor.

Monthly certifications are required for Title I personnel whose time is charged in part to Title I and in part to other revenue sources (split-funded staff). These reports document the portions of time and effort dedicated to Title I and to other revenue sources. Such records must (1) be completed after-the-fact, (2) account for the total time for which the employee is compensated, (3) be prepared at least monthly, (4) coincide with one or more pay periods, and (5) be signed by the employee and supervisor.

Stipends (and other supplemental contracts) must also be reported. Record stipends 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, and (3) employee payroll sheets that specify "Title I" and are approved by the supervisor.

ESE is subject to the same reporting requirements as local school districts. At the end of every month, State employees are required to indicate the percent of time spent on each program worked.

On this Page:

- Carryover
- Comparability
- Data Collection
- Ed-Flex Waivers
- Maintenance of Effort
- Preschool Programs
- Program Evaluation
- Schoolwide Programs
- Supplement, Not Supplant
- Targeted Assistance Programs
- Time & Effort Reporting

Time & Effort Reporting

Sample Title I Time & Effort Records
A Targeted Assistance Program is one in which the district uses Title I funds in a school to provide supplemental educational services to students who are failing or most at risk of failing to meet the State’s student academic achievement standards.

Targeted Assistance Programs

- Targeted Assistance Program Plan/Use of Funds in Targeted Assistance Schools (updated by districts annually)
- Student Selection Procedure
- Program Design & Implementation (PowerPoint from October 6, 2011 Title I Technical Assistance Session)

Student Selection Criteria Sheet (updated by districts annually)

Rank-Ordered Student Selection List of Title I Students in Targeted Assistance Programs - (updated by districts annually)
Opportunity and equal educational access

- Evidence of private school outreach
- N/D documentation (if applicable)
Opportunity and equal educational access

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.

To be eligible for Title I services, a private school child must reside in a participating public school attendance area and must meet the requirements in Section 1115(b) of Title I, which required the district to use multiple, educationally related, objective criteria in selecting children to participate in the Title I program. Under that section, certain children may be identified as eligible solely by virtue of their status: for example, homeless children and children who in the preceding two years had participated in Head Start, Even Start, Early Reading first, a Title I preschool program, or a Title I, Part C (Migrant Education) program. In all cases, Title I services, materials and supplies, are to be supplementary and cannot supplant funds. Generally, to qualify for assistance under Title I, private school students must reside within the attendance area of a participating public school in a low-income area and be failing, or at risk of failing, to meet academic achievement standards.
The **Handbook for Title I Directors** is a resource intended to assist Title I directors in managing their Title I program throughout the school year.
## Additional resources

### Year-at-a-Glance: August - November

<table>
<thead>
<tr>
<th>August</th>
<th>September</th>
<th>October</th>
<th>November</th>
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<tbody>
<tr>
<td>Submit Title I data (for previous fiscal year) via the Department's</td>
<td>Update comparability procedure &amp; make determination of comparability.</td>
<td>Submit requests to amend grants, as needed.</td>
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<td>Title I Data Collection Application on the ESE Security Portal.</td>
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<td>Collect signed Time &amp; Effort records for split-funded staff.</td>
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<td>Review &amp; update student selection criteria sheet &amp; student selection</td>
<td>Update contact information with your district Directory Administrator.</td>
<td>Submit Final Financial Report (FR-1) to Grants Management (for NCLB grants ending in August)</td>
<td>Ensure Title I schools have created rank-ordered student selection lists of Title I students in Targeted Assistance programs, set up files, notified parents, &amp; implemented targeted assistance services.</td>
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<tr>
<td>procedure for Targeted Assistance programs.</td>
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<td>Review &amp; update Title I personnel lists by building.</td>
<td>With assistance of business manager, document Title I expenditures per school building for the current &amp; prior school years.</td>
<td>Ensure Home-School Compacts are collected.</td>
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<td>Distribute Report Cards (at the beginning of the school year &amp; no</td>
<td>Design evaluations for district &amp; school parental involvement activities.</td>
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<td>later than October)</td>
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Title I program review - purpose

- Helps ensure that all children in Massachusetts have the opportunity to obtain a high-quality education
- Holds school districts accountable for appropriate use of resources
- Identifies effective delivery models and technical assistance needs
Every six years each school district in the Commonwealth is scheduled for a coordinated program review of state and federal programs.

Coordinated program review schedule: [http://www.doe.mass.edu/pqa/review/cpr/6ycycle.html](http://www.doe.mass.edu/pqa/review/cpr/6ycycle.html)

Timeline: Winter – Spring (60 days to submit materials)

Primarily desk-based, some site visits

Notification of findings and required actions, if any, near end of school year
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- Downloadable Samples - Data Collection & Management (ZIP Archive File)
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### Fiscal Procedures

<table>
<thead>
<tr>
<th>CRITERIA</th>
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<td>NCLB §§1120A; 1114~1116</td>
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<tr>
<th>1-D</th>
<th>Supplement, Not Supplant for Targeted Assistance Schools:</th>
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<tr>
<td></td>
<td>District/school demonstrates that Title I funds have been used for the express purpose of serving those students who were identified as being in greatest need of Title I assistance based on student selection criteria.</td>
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<td>NCLB §§1120A; 1114~1116</td>
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<table>
<thead>
<tr>
<th>EVIDENCE</th>
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<tbody>
<tr>
<td>▪ Title I School Building Expenditures</td>
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<thead>
<tr>
<th>1-E</th>
<th>Supplement, Not Supplant for Schoolwide Program Schools:</th>
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<td></td>
<td>District demonstrates that Title I funds in Schoolwide program school(s) are in addition to total amount of funds that would, in the absence of Title I funds, be made available from state and local sources, including funds needed to provide services required by law for students with disabilities and students with limited English proficiency.</td>
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<td></td>
<td>NCLB §§1120A; 1114~1116</td>
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<tr>
<td>▪ Federal Grant Assurances Document (on file with the Department)</td>
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<tr>
<td>▪ Written “Supplement, Not Supplant” Policy and Procedures</td>
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<tr>
<td>▪ Student Selection Criteria and rank ordered list of Title I students (if not a Schoolwide program)</td>
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<tr>
<td>▪ Federal Grant Assurances Document (on file with the Department)</td>
</tr>
<tr>
<td>▪ Written “Supplement, Not Supplant” Policy and Procedures</td>
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<td>▪ Comparability Report</td>
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<td>▪ Additional District Records (as requested)</td>
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# Title I program review – findings

**FY12 Title I Program Review - Required Actions Following Desk Audit**

**Required Action:**
- Yes (see below)
- None at this time

<table>
<thead>
<tr>
<th>Criterion Number / Category</th>
<th>Finding</th>
<th>Required Action</th>
<th>Deadline for Submission of Evidence</th>
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<tbody>
<tr>
<td><strong>Parent / Guardian Communications</strong></td>
<td>District did not submit notice to parents/guardians about right to know and obtain individual teacher qualifications, for the current school year (2011-12). Evidence was submitted from last school year (2010-11).</td>
<td>Submit parent/guardian &quot;right to know&quot; notifications at Title I schools for school year 2012-13. Samples available at: <a href="http://www.doe.mass.edu/apa/titlei/parta/review/default.html?section=PR">http://www.doe.mass.edu/apa/titlei/parta/review/default.html?section=PR</a>.</td>
<td>October 12, 2012</td>
</tr>
<tr>
<td><strong>Parent / Guardian Communications</strong></td>
<td>District did not provide two signed copies of School-Parent compacts from Hyannis West Elementary.</td>
<td>Submit two signed copies of School-Parent compacts from Hyannis West Elementary from school year 2012-13. Sample materials available online at: <a href="http://www.doe.mass.edu/apa/titlei/parta/review/default.html?section=PR">http://www.doe.mass.edu/apa/titlei/parta/review/default.html?section=PR</a>.</td>
<td>October 12, 2012</td>
</tr>
<tr>
<td><strong>Data Collection &amp; Management</strong></td>
<td>Appropriate split-funded staff records were not submitted. District needs to submit a separate record for each month for the two split funded staff (Lithwin and Wegman).</td>
<td>Submit appropriate Time and Effort records for split-funded staff from school year 2011-12. Guidance and resources available at: <a href="http://www.doe.mass.edu/apa/titlei/parta/review/default.html?section=PR">http://www.doe.mass.edu/apa/titlei/parta/review/default.html?section=PR</a>.</td>
<td>October 12, 2012</td>
</tr>
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</table>
Preparing documentation - steps

1. Collect your materials.

2. Organize your materials by tab as outlined in the 2012-13 Title I Program Review Procedures document.

3. Store your materials in a binder, file box, or electronically using a flash drive, CD, or DVD.

4. Submit your materials to ESE via mail or in person.
Organize your materials by tab

**Fiscal procedures**
Tab 1: Comparability procedure
Tab 2: Comparability demonstration (updated annually)
Tab 3: Supplement, not supplant policy and procedures
Tab 4: Documentation of Title I expenditures per school building (current and prior year)

**Parent/guardian communications**
Tab 5: District and school parent/guardian involvement policies
Tab 6: School-parent/guardian compact (updated annually)
Tab 7: Documentation of parent/guardian outreach and involvement
Tab 8: Parent/guardian notification – report cards (updated annually)
Tab 9: Parent/guardian notification – right-to-know (teacher not meeting “highly qualified” requirements)

**Program design and evaluation**
Tab 10: Needs assessment procedure
Tab 11: Program evaluation procedure
Tab 12: Program evaluation summary, including private school service, if any (updated annually)
Tab 13: Targeted assistance program plans (updated annually)
Tab 14: Schoolwide program plans (if applicable; updated annually)
Tab 15: Revised school improvement plans for Title I schools classified into Levels 2, 3 and 4 (if applicable)

**Data collection and management**
Tab 16: Title I personnel lists
Tab 17: Time and effort records (updated as completed)
Tab 18: Student selection procedure in targeted assistance schools
Tab 19: Title I targeted assistance program student selection criteria (updated annually)
Tab 20: Rank-ordered student selection list of Title I students in targeted assistance program

**Opportunity and equal educational access**
Tab 21: Offer of consultation to eligible private schools (updated annually)
Tab 22: Affirmation of consultation with participating private school officials and description of services (if applicable)
Tab 23: Third-party contracts, if applicable
Tab 24: Neglected or delinquent (N or D) facility coordination, if applicable (updated annually)
Not an option

You **must** organize your required documentation by tab as shown on Slide 24. **Do not** organize documentation according to the criteria used to review compliance (i.e., 1-A, 1-B, 1-C, etc.) found at the end of *2012-13 Title I Program Review Procedures* document (image below).
Option 1: Binder

- Materials are organized by tabbed dividers in a three-ring binder.
- Tabs are printed or neatly written in ink.
- Outside of binder labeled with the name of the district and “12/13 Title I Program Review”
- Contact information easily located inside front of binder
- Multiple binders are clearly labeled (e.g., 1 of 2, etc.)
Option 2: File box

- When considering multiple binders, it may make sense to submit a file box instead.
- Materials are organized by tabbed folders inside hanging folders. Tabs must be printed or neatly written in ink.
- Outside of box labeled with the name of the district and “12/13 Title I Program Review”
- Contact information easily located inside lid of box.
- Multiple boxes are clearly labeled (e.g., 1 of 2, etc.)
Option 3: Flash drive, CD, or DVD

- You may elect to submit your materials electronically using a flash drive, CD, or DVD. If you decide to use this option, keep in mind the following:
  - All of your materials must be submitted together electronically, as ESE will not accept mixed media (e.g., a combination of paper and electronic files)
  - The filenames must be clearly labeled by tab (see image above)
  - You must save your files in Microsoft Word, Excel or Adobe PDF format
  - You must include a Microsoft Word file containing contact information
  - Preparation will likely involve scanning some documents and converting them to PDF
Submit your materials to ESE via mail or in person

- **Mail** your binder, box, or electronic media to:
  
  FY13 Title I Program Review  
  ATT: School Improvement Grant Programs  
  Massachusetts Department of Elementary and Secondary Education  
  75 Pleasant Street  
  Malden, MA 02148  

  OR

- **Drop off** your materials in person at the front desk of the Massachusetts Department of Elementary and Secondary Education in Malden. For directions, visit:  
  [www.doe.mass.edu/contact/doedirections.html](http://www.doe.mass.edu/contact/doedirections.html)
Checklist

Did you remember to:

✓ Organize your materials by tab as outlined in the *2012-13 Title I Program Review Procedures* document and as shown in Slide 24?

✓ Store your materials in a binder, file box, or electronically using a flash drive, CD, or DVD?

✓ Make a duplicate copy of the binder, file box, or electronic media for recordkeeping purposes? *(This is strongly recommended)*

✓ Include contact information inside the binder or file box; or, if using electronic media, include a Microsoft Word file containing this information?

✓ Ensure your binder or file box is boxed up and sealed; or, if using electronic media, ensure you used a padded mailer and wrote “fragile” on the outside of the mailer?

✓ Consider purchasing tracking and/or delivery confirmation?

✓ Clearly label your mailing with a delivery address and return address?
Questions?

Website:  http://www.doe.mass.edu/apa/titlei/parta/review
Email:  titlei@doe.mass.edu
Phone:  781-338-6230