



2011-12 Title I Program Review Procedures

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Summary

Description

The Title I program review is a regular, systematic examination of school district administration and implementation of federal education grants.

Purpose

The Title I program review, in conjunction with other state and federal program reviews, aims to ensure that all children in Massachusetts have a fair, equal, and significant opportunity to obtain a high-quality education. The review is a means of holding school districts accountable for appropriate use of resources. By informing the Massachusetts Department of Elementary and Secondary Education of local activities and needs, the program review allows the State to identify both effective delivery models and technical assistance needs.

Dimensions

The Title I program review encompasses the following five (5) interrelated dimensions. The review ensures district compliance with statutory and regulatory requirements, and provides evidence that district Title I programs and policies exhibit a focus on improving student academic achievement.

1. Fiscal Procedures
2. Parent/Guardian Communications
3. Program Design and Evaluation
4. Data Collection and Management
5. Opportunity and Equal Educational Access

A subset of districts undergoing the Title I program review may also be required to submit additional information related to the district's implementation of Supplemental Educational Services (SES). The SES review ensures that districts and SES providers adhere to certain parameters in the design and delivery of SES programs. The SES review includes the following four dimensions:

1. Notification of Service Availability
2. Accessibility of Services
3. Service Delivery
4. Equity and Access

Process

Every six years each school district in the Commonwealth is scheduled for a Coordinated Program Review of state and federal programs. The Department's Coordinated Program Review schedule is available at <http://www.doe.mass.edu/pqa/review/cpr/6yrcycle.html>. Districts receiving Title I funds undergo a Title I program review in the same year they are scheduled for Coordinated Program Review.

The Department notifies each district undergoing a Title I program review of the timeline for submitting required materials. After materials have been received, Department staff conduct a desk-audit of submitted materials and other extant data. In certain cases, Department staff may conduct interviews with district staff and/or schedule on-site visits to review additional documentation, interview relevant staff, and observe programs in Title I schools.

The specific criteria used for the Title I program review are contained in the following pages of this document. Department staff review district documentation for compliance with selected statutory and regulatory requirements upon which the review criteria are based.

Following the review, the Department issues a report to the district describing any findings that do not meet the specified criteria and details required actions, if any. Districts then have a specified window of time within which to submit evidence that required actions have been taken.

This document and additional information about the Title I program review process are available at: <http://www.doe.mass.edu/titlei/monitoring>.

List and Description of Required Materials

Each district undergoing a Title I program review must submit to the Department copies of the following documents. **Districts must organize required documentation by tab according to the categories below. 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 this document.** Such organization results in unnecessary duplication of documentation. All required documentation must be submitted to the Department within 60 days from the date of notification. Submission details and timelines are described in separate notification to the district. Samples are available at: <http://www.doe.mass.edu/titlei/monitoring>.

Documentation should be organized and labeled according to the following tabs:

Fiscal Procedures

Tab 1A – Comparability Procedure: 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. Each year Title I districts are required to demonstrate through appropriate documentation that they are in compliance with the Title I comparability requirements. The district’s comparability procedure should be in writing and state that comparability is an annual requirement. It should identify the office responsible for making the comparability calculations and sources of the data and should include the measure and process used to determine whether schools are comparable. The procedure should also include the district’s timeline for demonstrating comparability and how and when the district makes adjustments in school staffing when schools are not comparable.

Documentation: Submit a **dated** copy of the district’s written comparability procedure for the current school year (**SY2011-12**).

Tab 1B – Comparability Demonstration (updated annually): The Comparability Demonstration comprises forms documenting equivalence in the assignment of instructional personnel. In addition, districts must maintain on file a district-wide salary schedule and a statement regarding the policy and procedures to ensure equivalence in the provision of instructional materials and supplies. Detailed instructions and forms for SY2011-12 are located at: <http://www.doe.mass.edu/titlei/monitoring>.

Documentation: Submit completed comparability forms (either the “traditional” forms A through D or the newer automated forms) for **SY2011-12**.

Tab 2 – Supplement, Not Supplant Policy and Procedures: The district’s Supplement, Not Supplant Policy and Procedures describe how the district ensures that Title I funds are used only to supplement, and not supplant, state and local funds that would, in the absence of Title I funds, be spent on Title I students. The procedure must **include description of the means by which the policy is disseminated** to personnel involved with Title I.

Documentation: Submit the **most current, dated copy** of the district’s Supplement, Not Supplant Policy and Procedures document.

Tab 3 – Documentation of Title I Expenditures per School Building (Current Year and Prior Year): Districts must provide an accounting of Title I instructional expenses for each school. The Current Year report lists Title I expenditures from October and November 2011. The Prior Year report lists the Title I expenditures per served school from SY2010-11. Expenditures included in the total are all Chart of Accounts “Account 2000” expenditures (see your Business Manager for details). These instructional expenditures include the following: school building leadership, instruction – teaching services, instructional materials and equipment, professional development costs, coaching, guidance counseling, testing services, and psychological services.

NOTE: Title I ARRA spending activities must be included in the SY2010-11 accounting of expenditures per Title I-served building.

Documentation: Submit accounting of total expenditures per Title I school building for the combined months of **October and November 2011 as well as** total expenditures per Title I school building from **SY2010-11**. Instructional expenditures include all Chart of Accounts “Account 2000” expenditures from the end of year report (see your Business Manager for details). Sample reports are available at: <http://www.doe.mass.edu/titlei/monitoring>.

Parent / Guardian Communications

Tab 4 – District and School Parent/Guardian Involvement Policies: Districts and Title I schools must develop jointly with, annually evaluate with, and distribute to parents/guardians of Title I students (or, in the case of Schoolwide programs, all students) written parent/guardian involvement policies. The policies establish the district’s and each Title I school’s expectations for parent/guardian involvement, and describe how the district and served schools will involve parents/guardians in developing the district and school improvement plans and in reviewing school performance; provide

support to assist Title I schools in planning and implementing effective parent/guardian involvement activities to improve student achievement; build the schools' and parents' /guardians' capacity for strong parental involvement; and coordinate and integrate parent/guardian involvement strategies with other programs (e.g., Head Start program, etc.).

Documentation: Submit the **most current, dated copy** of the district's **and** each Title I school's Parent/Guardian Involvement Policy. Submit evidence that the district policy and each Title I school's policy has been reviewed by parents and revisions have been made in an updated policy. Evidence can include relevant meeting agenda items, meeting notes, and written parental feedback.

Tab 5 – School – Parent/Guardian Compact (updated annually): The School – Parent/Guardian Compact is a written agreement that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. In a Targeted Assistance program, compacts should identify specific grades and subject areas served, and are only required for families of students served by Title I funds. In a Schoolwide program, compacts for all families are required.

Documentation: Submit two examples of signed copies of compacts from **each** Title I school from **SY2011-12**.

Tab 6 – Documentation of Parent/Guardian Outreach and Involvement (updated annually): Districts and schools are expected to involve parents/guardians of students served by Title I funds in a Targeted Assistance program or the parents/guardians of all students in the school in a Schoolwide program. Evidence includes copies of meeting agendas, workshop flyers, sign-in sheets, and other documentation which demonstrates the district helps parents/guardians understand such things as: the State's high standards; State and local academic assessments, including alternative assessments; the parental involvement requirements of Section 1118 of NCLB; how to monitor their child's progress and work with educators to improve the achievement of their child; how to become involved in performing annual needs assessments for each Title I school (both Schoolwide and Targeted Assistance programs); and how to become involved in the revision of school and/or district improvement plans for schools and districts identified for improvement, corrective action or restructuring.

Documentation: For each Title I school, submit the **dated notice** sent to parents informing them of the annual Title I meeting. Provide a **limited sampling** of evidence to show that the required communication and training was provided to parents/guardians of Title I students to promote parent/guardian involvement at each Title I Targeted Assistance school and to all parents/guardians at each Title I Schoolwide program school in **SY2011-12 and/or SY2010-11**.

Tab 7A – Parent/Guardian Notification – NCLB Report Cards (updated annually): Districts receiving Title I funds must prepare and disseminate annual report cards for the district and each of its schools containing certain information related to assessment, accountability, and teacher quality.

Documentation: Submit a copy of the dated notification letter sent to parents/guardians from each Title I school in the district in **SY2011-12**. Do not submit a copy of the NCLB report cards themselves. **Note: Posting on district websites is insufficient to meet requirement that all families are provided NCLB Report Card information. See guidance on distribution requirements at <http://www.doe.mass.edu/nclb/reportcard/?section=distribute&template=nclb>.**

Tab 7B – Parent/Guardian Notification – Right-To-Know (updated annually): Districts must annually notify the parents/guardians of each student attending any Title I school that they may request information regarding certain professional qualifications of the student's classroom teachers. In addition, schools that receive Title I funding must provide each individual parent/guardian timely notice that the parent's child has been assigned or has been taught for four or more consecutive weeks by a teacher who is not highly qualified (regardless of whether or not the teacher is being paid with Title I funds).

Documentation: Submit a dated copy of the notification letter sent to parents/guardians from each Title I school in the district in **SY2011-12**. In addition, if a teacher who was not highly qualified taught children for four or more weeks, submit evidence that parents/guardians were notified in a timely manner.

Tab 7C – Parent/Guardian Notification – NCLB Accountability Status and School Choice – if applicable: Districts receiving Title I funds must notify parents/guardians of each student attending a school identified for improvement, corrective action or restructuring of that school's status and of options available to them. While a school receiving Title I funds is identified for improvement, corrective action or restructuring, the district is required to offer the parents/guardians of all students enrolled in the school the option to transfer to another public school served by the district that has not been identified for school improvement, if available.

Documentation: Submit a copy of the dated notice of NCLB accountability status and/or school choice notification letter sent to parents/guardians from each Title I school in the district identified for improvement, corrective action or restructuring in **SY2011-12**.

Tab 7D – Parent/Guardian Notification – Supplemental Educational Services (SES) – if applicable: If a school receiving Title I funds is identified for improvement (year 2), corrective action or restructuring, the district is required to offer students from low-income families free tutoring, or supplemental educational services (SES).

Documentation: Submit a copy of the dated SES notification letter sent to eligible parents/guardians from each Title I school in the district identified for improvement (year 2), corrective action or restructuring in **SY2011-12**.

NOTE (Tabs 7B, 7C, & 7D): Districts may include Right-To-Know, NCLB Accountability Status/School Choice and Supplemental Educational Services notifications in a single letter sent prior to or at the beginning of the school year.

Program Design and Evaluation

Tab 8 – Needs Assessment Procedure: Districts are required to conduct annual needs assessments for each Title I school (both Schoolwide and Targeted Assistance programs) that include data on student achievement relative to State standards, and input from parents and educators. The Needs Assessment Procedure briefly describes how the district and schools conduct their needs assessments in order to establish priorities for action and make appropriate decisions about the allocation of resources (e.g., people, materials, time, and fiscal, including all funds under NCLB). This includes a description of the quantitative and qualitative data collected and analyzed, who is involved in the analysis, how priority needs are determined, and how school improvement planning and documentation relate to this process.

Documentation: Submit a copy of the **most current, dated** summary of the district’s procedure for assessing areas of greatest academic need.

Tab 9A – Program Evaluation Procedure: Districts are required to evaluate their Title I programs at least annually. The Program Evaluation Procedure describes how each school’s Title I program, including participating private school programs and parent/guardian involvement policies and procedures, is annually evaluated for impact on student achievement. This includes the data used, constituents consulted, process used to arrive at evaluation findings, and how these findings are utilized for planning and improvement.

Documentation: Submit the **most current, dated copy** of the written procedure for evaluating Title I program implementation and impact.

Tab 9B – Program Evaluation Summary, including private school service, if any (updated annually): The Program Evaluation Summary is a written summary of the procedures used to evaluate the Title I program in each Title I school. This includes a list of strengths and weaknesses of the program (including any private school service) as indicated by findings from data analysis, and description of any consequent program changes made.

Documentation: Submit a copy of the program evaluation summary and findings from the previous year’s Title I program in the district (**SY2010-11**), including evaluation of any services provided to eligible students in private schools.

Tab 10A – Targeted Assistance Program Plans (updated annually): A "Targeted Assistance Program Plan" is documented by completing the template provided (see <http://www.doe.mass.edu/titlei/monitoring>). The form provides a summary of what is being taught to whom, by whom (e.g., number and type of teachers / paraprofessionals); in which grades; and using which model (e.g., inclusion or pull-out). Districts are required to develop Targeted Assistance program plans that are coordinated with and support regular education program(s) in relevant schools. Title I staff must be integrated with regular instructional staff in all activities, and Targeted Assistance programs must: (1) Use effective instructional methods and strategies that strengthen the core academic program of the school; (2) Use multiple, educationally related, objective criteria to identify

children failing, or most at risk of failing, to meet the State's academic achievement standards (children in grades PK-2 selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures); (3) Give primary consideration to providing extended learning time for served students; (4) Provide an accelerated, high-quality curriculum; (5) Minimize the removal of children from the regular classroom during regular school hours.

Documentation: Submit completed template documenting composition of current school year (**SY2011-12**) Title I program in each Targeted Assistance program school. (*Not applicable to Schoolwide programs*).

Tab 10B – Schoolwide Program Plans – if applicable (updated annually): A Schoolwide program is one in which districts have elected to use Title I funds in combination with other federal, State, and local funds to upgrade a school's entire educational program. While ten components must be addressed in a Schoolwide plan (SWP), it is not necessary for the SWP to be separate and apart from the school improvement plan (SIP). However, the SIP must make clear how and where the ten components of the SWP are addressed within the SIP. The SWP must demonstrate how schools in each district that is not reserving funds under Title I for homeless students is providing for appropriate services in Schoolwide programs.

Documentation: Submit a copy of the **current, dated** Schoolwide Plan or School Improvement Plan that incorporates the Schoolwide Plan for each Schoolwide Program school. Each of **the ten required components of a Schoolwide Plan must be labeled** or marked with tabs. (Not applicable to Targeted Assistance programs).

Tab 11 – Revised School Improvement Plans for Title I Schools with Accountability

Status: Once identified for improvement, a school must revise its school improvement plan to address the subjects, grade levels and student groups in which the school did not make AYP. In developing or revising this plan, the school must consult with parents, school staff, and others. The plan must be revised no later than three months after the school has been identified for improvement. When schools are identified for corrective action status, the district plans for and implements corrective action steps stipulated in NCLB, as appropriate. When schools are identified for restructuring status, the district plans for and implements restructuring steps stipulated in NCLB, as appropriate.

Documentation: Submit a **current, dated copy** of the revised School Improvement Plan with **revised sections clearly labeled** to show that required areas for revision have been addressed.

Data Collection and Management

Tab 12 – Title I Personnel Lists: The Title I Personnel List is the district's accounting of Title I personnel information for SY2011-12.

Documentation: Submit listing of all Title I staff broken down by Title I school, individual, and FTE, including all Title I stipended positions broken down by school and individual (see Payroll Manager for supporting documentation).

Tab 13 – Time and Effort Records (updated as completed): Districts must maintain auditable "time and effort" records that show how each Title I employee spent his or her compensated time. These records are written, after-the-fact (not estimated or budgeted) documentation of how the time was spent. Time and effort records must be prepared by any Title I staff with salary or stipend charged (1) directly to a federal award, (2) directly to multiple federal awards, or (3) directly to any combination of a federal award and other federal, state or local fund sources. For "full-time" staff, each district must submit copies of signed semi-annual certifications documenting that staff work solely in activities supported by the Title I grant. For "split-time" staff, each district must submit documents that describe time spent on Title I and other activities. For any Title I staff paid a stipend, each district must submit documents that describe the amount paid and hours worked on Title I activities.

NOTE: If a school operating a schoolwide program consolidates Federal, State, and local funds in a consolidated schoolwide pool, an employee who is paid with funds from that pool is not required to file a semi-annual certification. Because Federal funds are consolidated with State and local funds in a single consolidated schoolwide pool, there is no distinction between staff paid with Federal funds and staff paid with State or local funds. A school that consolidates Federal funds in its schoolwide program is not required to meet most of the statutory and regulatory requirements of the specific Federal programs included in the consolidation. However, the school must ensure that it meets the intent and purposes of the Federal programs included in the consolidation so that the needs of the intended beneficiaries are met. A schoolwide school must identify in its schoolwide plan which programs are included in its consolidation and the amount each program contributes to the consolidated schoolwide pool.

Documentation: Submit updated and complete time and effort records for all Title I staff (full-, part-, split-time, or stipends) for the first half of the **2011-12 school year** (September to December/January 2012).

Tab 14 – Principals' Written Attestation - HQ (updated annually): Principals of Title I schools (Schoolwide or Targeted Assistance) must provide annual written attestation that all teachers of core academic subjects have met, or are working toward meeting, the NCLB Title II-A Highly Qualified Teacher and Paraprofessional requirements. Copies of such attestations must be maintained at each Title I school and at the main office of the district.

Documentation: Submission of principal written attestations is **no longer required**. The Department will review district submissions of Teacher Effectiveness and Quality Improvement Plans (TEQIPs) and EPIMS data already on file at the Department.

Tab 15A – Student Selection Procedure: Each district must have a procedure outlining the process used in Targeted Assistance schools to identify students failing, or most at-risk of failing to meet the State's challenging student academic achievement standards on the basis of multiple, educationally related objective criteria established by the district and supplemented by the school.

Documentation: Submit a copy of the current, dated student selection procedure used in Targeted Assistance program schools to identify students for participation in the Title I program in **SY2011-12**. *(Not applicable to Schoolwide programs.)*

Tab 15B – Title I Student Selection Criteria Sheet (updated annually): Students are selected for participation in Title I Targeted Assistance programs based on multiple, objective, educationally-related criteria. Selection criteria are weighted by attaching a range of points to each one. Screened students with the highest scores, therefore, exhibit the greatest academic need for program participation.

Documentation: Submit a copy of the current school year’s (**SY2011-12**) student selection criteria sheets for each subject and grade served in Targeted Assistance programs. *(Not applicable to Schoolwide programs.)*

Tab 15C – Rank-Ordered Student Selection List of Title I Students in Targeted Assistance Programs – if applicable (updated annually): Each district must maintain rank-ordered lists of Title I students that list, from highest total selection criteria points to lowest, each student screened for targeted Title I assistance. Lists include selection score, indication of selection for service or not, and notation of any required services already provided (such as Special Education services or English language learner status).

Documentation: Submit copies of the current school year’s (**SY2011-12**) lists of students screened for selection. Lists should be by subject and grade served and include individual student total scores, listed in descending order. To protect student confidentiality, please **do not include student names** (remove or white-out). *(Not applicable to Schoolwide programs.)*

Opportunity and Equal Educational Access

Tab 16A – Offer of Consultation to Eligible Private Schools (updated annually): 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. Evidence of private school outreach and programming includes signed confirmation or return receipt slips from eligible private school leaders that consultation on providing services to eligible private school students has been offered. If services are accepted, districts must submit affirmation from private schools of consultation in all required areas (see Tab 16B).

Documentation: Submit evidence of offers of consultation regarding service to **each** eligible private school listed on Form 1 of the district’s application for the current school year (**SY2011-12**). Evidence must show that offers were received by all eligible schools (e.g., signed confirmation or return receipt slips).

Tab 16B – Affirmation of Consultation with Participating Private School Officials and Description of Services (if applicable):

Title I statute and regulations require that timely and meaningful consultation occur between school district staff and private school officials prior to any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel to participate in Title I programs. Written affirmation of consultation covering the nine required components must be obtained from an authorized representative of each participating private school.

Documentation:

- a) As part of the annual application for Title I funds, districts must submit a copy of “Form 7”, Affirmation of Consultation with Participating Private School Officials, for each participating private school. If the district has submitted all necessary copies of Form 7 as part of the grant application, there is no need to provide additional copies, and
- b) Submit a clear, concise description of services being provided to each participating private school in **SY2011-12**. See Tab 10A for instructions regarding how to document Targeted Assistance program plans.

Tab 16C – Third-Party Contracts (if applicable): Districts may provide services to eligible private school children either directly or through arrangements with another district or a third-party provider. If the district contracts with a third-party provider, the provider must be independent of the private school and of any religious organization and the contract must be under the control and supervision of the district. Contracts must provide technical descriptions of the Title I services with detail sufficient to enable the district to determine that the Title I statutory and regulatory requirements will be met as required by Section 9306 of the Elementary and Secondary Education Act (ESEA).

Documentation: Provide copies of any third-party contracts with providers of the district’s equitable services to eligible private school students in **SY2011-12**. Contracts must specify the amount or percentage of funds used for administrative costs. Contracts for more than one type of service (e.g., student tutoring and staff professional development) must delineate the specific amount for each type of activity.

Tab 17 – Neglected or Delinquent Facility Coordination (if applicable - updated annually):

Title I, Part D (The Prevention and Intervention Program for Children and Youth Who Are Neglected, Delinquent, or At-Risk) assists the education of certain disadvantaged children. Allocation notices are sent directly to public school districts with an eligible N or D facility located within their boundaries.

Documentation: Districts with N or D facilities located within their district boundaries must submit (a) a copy of the facility Title I N or D grant application for **SY2011-12** required to be on file with the district, and (b) a copy of the required formal agreement for **SY2011-12** between the LEA and facility for whom the LEA is fiscally responsible for Title I funds. If a district does not have an eligible N or D facility within its boundaries, this tab will not contain any materials.

Supplemental Educational Services (Selected Districts Only)

Supplemental Educational Services (SES) are additional, free, academic instruction designed to increase the academic achievement of students in schools identified for improvement, corrective action or restructuring under NCLB. Students from low-income families attending Title I schools in their second year of school improvement (i.e., have not made Adequate Yearly Progress (AYP) for three or more years), in corrective action, or in restructuring status are eligible to receive SES.

Documentation: Districts selected for an SES review must provide dated copies of the notification sent to parents/guardians; copies of policies for outreach, enrollment and student selection; copies of contracts/agreements entered into with providers that specify billing procedures, guidelines concerning use of school facilities, and other logistics; copies of SES Student Learning Plans; and information on actions taken by the district if it spent less than the amount needed to meet its 20 percent obligation for SES.

Program Review Criteria

The criteria below are based on the statutory requirements of Title I programming and serve as the basis for the report of findings (if any).

PLEASE NOTE: Document submission should not be organized according to the program review criteria below. Rather, documents for submission must be organized according to the list of tabs on the preceding pages.

Fiscal Procedures	
CRITERIA	EVIDENCE
<p>1-A Maintenance of Effort: District's combined fiscal effort per student (or aggregate local and state expenditures for free public education for the preceding fiscal year) was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year. (N.B., Maintenance of Effort applies to local and state expenditures, not to Title I or other federal expenditures.) NCLB §§1120A; 9021</p>	<ul style="list-style-type: none"> ▪ <i>Federal Grant Assurances Document (on file with the Department)</i> ▪ <i>Maintenance of Effort Records (on file with the Department)</i>
<p>1-B Comparability of Services: District has and follows a written Comparability reporting procedure. District's Comparability Demonstration (Report) is prepared annually and demonstrates that services provided through state and local funds in Title I schools are comparable to those provided in non-Title I schools. When all schools are Title I schools, Comparability Report demonstrates that district uses state and local funds to provide services that, taken as a whole, are substantially comparable in each school. (N.B., Comparability of Services applies to local and state funds, not to Title I or other federal funds.) NCLB §§1120A</p>	<ul style="list-style-type: none"> ▪ <i>Comparability Report</i> ▪ <i>Comparability Procedure</i>
<p>1-C Supplement, Not Supplant: District demonstrates that it uses Title I funds only to augment the level of funds that would in the absence of Title I funds be made available from non-Federal sources for the education of students participating in Title I programs.</p>	<ul style="list-style-type: none"> ▪ <i>Federal Grant Assurances Document (on file with the Department)</i> ▪ <i>Written "Supplement, Not Supplant" Policy and Procedures</i> ▪ <i>Comparability Report</i>

Fiscal Procedures	
CRITERIA	EVIDENCE
	<p>NCLB §§1120A; 1114~1116</p> <ul style="list-style-type: none"> ▪ <i>Title I School Building Expenditures</i>
<p>1-D</p> <p>Supplement, Not Supplant for Targeted Assistance Schools: 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. NCLB §§1120A; 1114~1116</p>	<ul style="list-style-type: none"> ▪ <i>Federal Grant Assurances Document (on file with the Department)</i> ▪ <i>Written "Supplement, Not Supplant" Policy and Procedures</i> ▪ <i>Student Selection Criteria and rank ordered list of Title I students (if not a Schoolwide program)</i>
<p>1-E</p> <p>Supplement, Not Supplant for Schoolwide Program Schools: 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. NCLB §§1120A; 1114~1116</p>	<ul style="list-style-type: none"> ▪ <i>Federal Grant Assurances Document (on file with the Department)</i> ▪ <i>Written "Supplement, Not Supplant" Policy and Procedures</i> ▪ <i>Comparability Report</i> ▪ <i>Additional District Records (as requested)</i>
<p>1-F</p> <p>Supplement, Not Supplant: District has developed, implemented, and disseminated written Supplement Not Supplant policy and procedures. Administrators and appropriate staff demonstrate clear understanding of policy and procedures. NCLB §§1120A; 1114~1116</p>	<ul style="list-style-type: none"> ▪ <i>Federal Grant Assurances Document (on file with the Department)</i> ▪ <i>Written "Supplement, Not Supplant" Policy and Procedures</i>
<p>1-G</p> <p>Reservation of Funds: District reserves appropriate level of funds for:</p> <ol style="list-style-type: none"> 1. Homeless children 2. Children in institutions for Neglected or Delinquent children 3. Financial incentives and/or rewards for teachers in Title I schools identified for improvement, corrective action, or restructuring 4. School choice-related transportation and supplemental educational services 5. Professional development – highly qualified teachers 6. Professional development – schools or districts identified for improvement 7. Parental involvement 	<ul style="list-style-type: none"> ▪ <i>Title I Grant Application (Form 2) (on file with the Department)</i>

Fiscal Procedures		
CRITERIA		EVIDENCE
	NCLB §§1113; 1116; 1118	
1-H	Private School Participants: District appropriately calculates and expends funds for equitable services to private school students, their teachers, and families. NCLB §§1120; 9306; GEPA §443	<ul style="list-style-type: none"> ▪ <i>Title I Grant Application (Form 1 and 2) (on file with the Department)</i> ▪ <i>Private School Documentation</i>
1-I	Single audit: Districts expending \$500,000 or more annually in Federal grant awards comply with single audit requirements (apart from districts taking program-specific audit exception). OMB Circular A-133	<ul style="list-style-type: none"> ▪ <i>A-133 Single Audit Reports (on file with the Department)</i> ▪ <i>District Audit Corrective Action Plans (if appropriate) and Records (as requested)</i>

Parent / Guardian Communications		
CRITERIA		EVIDENCE
2-A	District notifies parents/guardians of school and district accountability status (identified for improvement, corrective action, restructuring). Additionally, district publishes and distributes annual NCLB Report Cards for district and all district schools and notifies parents of their right to know about teacher qualification requirements. NCLB §§1111-1112; §§1114-1118	<ul style="list-style-type: none"> ▪ <i>Sample Parent/Guardian Notification</i> ▪ <i>NCLB Report Cards</i>
2-B	Public School Choice: District notifies parents of all children in Title I schools identified for improvement, corrective action, or restructuring of option to transfer to another district school not identified for improvement, if such an option exists. NCLB §1116	<ul style="list-style-type: none"> ▪ <i>Sample Parent/Guardian Notification</i> ▪ <i>Additional District Records (as requested)</i>
2-C	Supplemental Educational Services (SES): District notifies parents of all low-income children in Title I schools identified for improvement (year 2), corrective action, or restructuring of option to enroll in SES, and establishes contracts with external providers from State List of Approved SES Providers. NCLB §1116	<ul style="list-style-type: none"> ▪ <i>Sample Parent/Guardian Notification</i> ▪ <i>Additional District Records (as requested)</i>
2-D	District creates and distributes written district parent/guardian involvement policies and School-Parent Compacts, and updates these policies and compacts periodically after evaluating their effectiveness. <ul style="list-style-type: none"> • Parent/guardian involvement policies describe each served school’s approach, commitments, and services offered to parents of Title I students (all students, in Schoolwide programs). Policies describe specific rights of parents and what information and meaningful activities are offered to parents so that they are well prepared to participate in their children’s educational growth. • School-Parent Compacts are agreements between the school (teachers) and the home (parents/guardians) that describe the responsibilities of each party, including the student, if desired. NCLB §§1111-1112; §§1114-1118	<ul style="list-style-type: none"> ▪ <i>District and Title I School(s) Parent/Guardian Involvement Policies (evaluated and revised for current school year)</i> ▪ <i>Signed School-Parent Compacts</i>
2-E	Schools conduct meetings at least annually to inform participating parents/guardians about Title I programs. District and its schools provide materials and training to Title I parents to help them	<ul style="list-style-type: none"> ▪ <i>Written parent meeting schedule</i> ▪ <i>Workshop flyers, agendas, sign-in</i>

Parent / Guardian Communications	
CRITERIA	EVIDENCE
<p>understand such things as:</p> <ul style="list-style-type: none"> • The State’s academic content standards and State student academic achievement standards; • State and local academic assessments, including alternative assessments; • The parental involvement requirements of section 1118; and • How to monitor their child’s progress and work with educators to improve the achievement of their child. <p>Additionally, districts and schools provide materials and training to help parents work with their children to improve their children’s achievement.</p> <p>NCLB §§1111-1112; §§1114-1118</p>	<p><i>sheets, et cetera</i></p> <ul style="list-style-type: none"> ▪ <i>Additional District Records (as requested)</i>

Program Design and Evaluation		
CRITERIA		EVIDENCE
3-A	District conducts annual needs assessment for each Title I school (both Schoolwide and Targeted Assistance programs) that includes data on achievement of children in relation to State academic content and achievement standards and input from parents and school and district staff. Needs assessment is used to determine type of programs and services to be provided to eligible students. NCLB §§1114~1115	<ul style="list-style-type: none"> ▪ <i>Needs Assessments</i> ▪ <i>Additional District Records (as requested)</i>
3-B	District submits annual Title I grant application (“plan”) and any necessary amendments to plan. NCLB §§1112; 1114~1116	<ul style="list-style-type: none"> ▪ <i>Title I Grant Application and Amendments (on file with the Department)</i>
3-C	District evaluates Title I plan at least on an annual basis and makes necessary revisions to reflect substantial changes in direction of Title I program(s). Evaluation reflects Adequate Yearly Progress (AYP) data for district and all Title I schools. NCLB §§1112; 1114~1116	<ul style="list-style-type: none"> ▪ <i>Written Title I Program Evaluation</i> ▪ <i>AYP Data (on file with the Department)</i> ▪ <i>Additional District Records (as requested)</i>
3-D	<p>Schoolwide Programs:</p> <p>If applicable, district develops comprehensive Schoolwide Program plans with involvement of community, individuals to be served, and relevant staff. Schoolwide plans are evaluated annually and must:</p> <ol style="list-style-type: none"> 1. Identify reform strategies, aligned with the needs assessment, that are research-based and provide opportunities for all children to meet the State’s proficient or advanced levels of academic achievement; 2. Provide instruction by highly qualified teachers; 3. Offer high-quality, ongoing professional development; 4. Create strategies to attract highly qualified teachers; 5. Create strategies to increase parental involvement; 6. Develop plans to assist preschool students through the transition from early childhood programs to local elementary school programs; 7. Identify measures to include teachers in decisions regarding the use of academic assessments; 8. Conduct activities to ensure that students who experience difficulty attaining proficiency receive effective, timely, additional assistance; 	<ul style="list-style-type: none"> ▪ <i>Schoolwide plans (if applicable)</i> ▪ <i>Additional District Records (as requested)</i>

Program Design and Evaluation		
CRITERIA		EVIDENCE
	<p>9. Coordinate and integrate Federal, State and local services and programs;</p> <p>10. Meet intent and purposes of each program whose funds are consolidated, if applicable.</p> <p>Moreover, Schoolwide plans must indicate how schools in districts that are not reserving funds under Title I for homeless students are providing for appropriate services in Schoolwide programs.</p> <p>NCLB §§1112; 1114</p>	
3-E	<p>Targeted Assistance Programs:</p> <p>District develops Targeted Assistance program plans that are coordinated with and support regular education program(s) in relevant schools. Title I staff must be integrated with regular instructional staff in all activities, and Targeted Assistance programs must:</p> <ol style="list-style-type: none"> 1. Use effective instructional methods and strategies that strengthen the core academic program of the school; 2. Use multiple, educationally related, objective criteria to identify children failing, or most at risk of failing, to meet the State's academic achievement standards (children in grades PK-2 selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures); 3. Give primary consideration to providing extended learning time for served students; 4. Provide an accelerated, high-quality curriculum; 5. Minimize the removal of children from the regular classroom during regular school hours. <p>NCLB §1115</p>	<ul style="list-style-type: none"> ▪ <i>Title I Grant Application (on file with the Department)</i> ▪ <i>Rank-order List of Students to Determine Eligibility</i> ▪ <i>Targeted Assistance Program Plans</i> ▪ <i>Additional District Records (as requested)</i>
3-F	<p>District revises school improvement plan for schools identified for improvement, corrective action, or restructuring within three months of identification to address the subjects, grade levels and student groups that did not make Adequate Yearly Progress. Plan is revised in consultation with parents, staff, and others, and must include:</p> <ol style="list-style-type: none"> 1. Annual, measurable goals and improvement objectives aligned with performance targets the school must meet for each group of students in order to make AYP; 2. Analysis of the causes or reasons for the school's failing to make AYP; 3. Improvement strategies, based on scientifically based research, that address the causes of poor student performance and make the changes in instructional practices and school programs necessary to meet improvement objectives in the school's core academic subjects; 4. High-quality professional development needed to implement the school's improvement 	<ul style="list-style-type: none"> ▪ <i>Revised School Improvement Plans</i> ▪ <i>AYP & MCAS Data (on file with the Department)</i> ▪ <i>Local assessment data (if applicable)</i> ▪ <i>Additional District Records (as requested)</i>

Program Design and Evaluation		
CRITERIA		EVIDENCE
	<p>objectives;</p> <ol style="list-style-type: none"> 5. Parental involvement tied to the school’s improvement objectives; 6. Extended time programs, as necessary, to meet the school’s improvement objectives; 7. Identification of resources needed to implement the school’s improvement plan; 8. Incorporation of a teacher mentoring program; 9. Methods for coordinating and monitoring the implementation of the school’s improvement plan; and 10. Identification of the responsibilities of the school, school district and the state for supporting the implementation of the plan. <p>NCLB §1116</p>	
3-G	<p>Schools Identified for Corrective Action and Restructuring:</p> <p>When schools are identified for corrective action status, district plans for and implements corrective action steps stipulated in NCLB, as appropriate. When schools are identified for restructuring status, district plans for and implements restructuring steps stipulated in NCLB, as appropriate.</p> <p>NCLB §1116</p>	<ul style="list-style-type: none"> ▪ <i>School Improvement Plans</i> ▪ <i>AYP & MCAS Data (on file with the Department)</i> ▪ <i>Additional District Records (as requested)</i>
3-H	<p>When district and/or schools are identified for improvement, district spends at least 10 percent of Title I funds for high-quality professional development that directly addresses the identified student performance issues.</p> <p>NCLB §1116</p>	<ul style="list-style-type: none"> ▪ <i>Title I Grant Application (on file with the Department)</i> ▪ <i>Additional District Records (as requested)</i>

Data Collection and Management		
CRITERIA		EVIDENCE
4-A	<p>All professional staff providing Title I services, including paraprofessionals, meet Massachusetts' Highly Qualified Teacher (HQT) requirements, or are on track to meeting NCLB's highly qualified teacher and paraprofessional requirements in compliance with Title II-A requirements.</p> <p>http://www.doe.mass.edu/nclb/title_ia.html</p> <p>MGL Ch. 71, §38G; NCLB §1119</p>	<ul style="list-style-type: none"> ▪ <i>EPIMS Submission District Teacher Effectiveness and Quality Improvement Plans (on file with Department)</i>
4-B	<p>Principals of Title I schools (Schoolwide or Targeted Assistance) provide written attestation that all teachers of core academic subjects have met or are on track to meeting NCLB's highly qualified teacher and paraprofessional requirements in compliance with Title II-A requirements.</p> <p>NCLB §1119</p>	<ul style="list-style-type: none"> ▪ <i>Principals' Written Attestation</i> ▪ <i>Title I Personnel List / Roster</i> ▪ <i>District Teacher Quality Improvement Plans (on file with Department)</i>
4-C	<p>Time and Effort:</p> <p>District maintains Time and Effort records for all Title I staff, documenting time spent on Title I activities.</p> <p><i>Full-time staff</i> funded solely by Title I grant sign semi-annual certifications that they have been working solely in activities supported by Title I grant for indicated period.</p> <p><i>Split-time staff</i> funded partly by Title I grant document time spent on Title I and other activities.</p> <p><i>Staff receiving stipends</i> through the Title I grant document amount paid and hours worked on Title I activities.</p> <p>Time & Effort records account for total time for which employee is compensated.</p> <p>OMB Circular A-87; OMB Circular A-133 Compliance Supplement</p>	<ul style="list-style-type: none"> ▪ <i>Time and Effort Records (including monthly records for split-funded staff, Semi-annual Certification for full-time staff, and records of any stipends paid through Title I)</i>
4-D	<p>Selection and Allocation:</p> <p>District appropriately allocates funds to eligible school attendance areas or schools in rank order of poverty based on number of children from low-income families residing in an eligible attendance area.</p> <p>NCLB §§1113; 1116; 1118</p>	<ul style="list-style-type: none"> ▪ <i>Title I Grant Application (Form 1) (on file with the Department)</i> ▪ <i>SIMS Enrollment Data (on file with the Department)</i> ▪ <i>Directory Administration Data (Schools in Eligible Attendance Areas) (on file with the Department)</i> ▪ <i>Title I School Building Expenditures</i>

Opportunity and Equal Educational Access		
CRITERIA		EVIDENCE
5-A	<p>All Students: District identifies as eligible for Title I services students with disabilities, limited English proficient students, and homeless students using the same basis as other students selected to receive services. District ensures that all students have equal opportunity to be selected to receive services. NCLB §1115</p>	<ul style="list-style-type: none"> ▪ <i>Rank-order List of Students to Determine Eligibility</i> ▪ <i>Title I Student Selection Criteria</i> ▪ <i>Additional District Records (as requested)</i>
5-B	<p>Private School Outreach and Programming: District consults with appropriate private school officials regarding services for eligible private school children, maintains written affirmation of consultation, provides equitable services, and evaluates Title I program serving eligible private school students. NCLB §§1120; 9306; GEPA §443</p>	<ul style="list-style-type: none"> ▪ <i>Evidence of Offers of Consultation to all Eligible Schools</i> ▪ <i>Written Affirmation of Consultation with Participating Schools (Form 7)</i> ▪ <i>Written Title I Program Evaluation Summary</i> ▪ <i>Third Party Contracts</i> ▪ <i>Additional District Records (as requested)</i>
5-C	<p>Services for Neglected or Delinquent Children: District consults with appropriate officials from N/D facilities regarding services for eligible children and establishes formal agreement(s) with N/D facilities, where appropriate, to deliver educational programs in local facilities that are comparable to programs in schools students would otherwise attend. District plan contains 13 elements required under N/D subgrant. Agreements contain 11 activities under N/D subgrant. NCLB §§1423;1425</p>	<ul style="list-style-type: none"> ▪ <i>Title I Grant Application (on file with the Department)</i> ▪ <i>Copies of communications with Neglected or Delinquent (N/ D) facilities (if applicable)</i> ▪ <i>Copies of formal agreements with N/D facilities (if applicable)</i>

Supplemental Educational Services (Selected Districts Only)	
<p>NOTIFICATION OF SERVICE AVAILABILITY: Does the district notify parents/guardians of the availability of SES in a timely, clear, and accessible way?</p>	<p>EVIDENCE</p>
<ul style="list-style-type: none"> ▪ The notice was provided sufficiently in advance of, but no later than 14 calendar days before, the start of the school year [34 C.F.R. §200.37(b)(4)(iv)]. ▪ The notice explains how parents can obtain SES for their child [Section 1116(e)(2)(A)(i); 34 C.F.R. §200.37(b)(5)(i)]. ▪ The notice identifies each approved SES provider within the district or in its general geographic location, including providers that are accessible through technology, such as distance learning [Section 1116(e)(2)(A)(ii); 34 C.F.R. §200.37(b)(5)(ii)(A)]. ▪ The notice briefly describes the services, qualifications and evidence of effectiveness for each provider [Section 1116(e)(2)(A)(iii); 34 C.F.R. §200.37(b)(5)(ii)(B)]. ▪ The notice indicates providers that are able to serve students with disabilities or LEP students [34 C.F.R. §200.37(b)(5)(ii)(B)]. ▪ The notice includes an explanation of the benefits of receiving SES [34 C.F.R. §200.37(b)(5)(ii)(C)]. ▪ The notice describes the procedures and timelines that parents must follow to select a provider to serve their child. ▪ The notice gives contact information for the district. ▪ The notice is easily understandable, in a uniform format, including alternate formats upon request, and to the extent practicable, in a language the parents can understand [Section 1116(e)(2)(A); 34 C.F.R. §200.36(b)]. ▪ The notice is clear and concise, and clearly distinguishable from other information on school improvement that the district sends to parents [34 C.F.R. §200.37(b)(5)(iii)]. ▪ The notice gives information about the services, qualifications, and evidence of effectiveness for each SES provider able to serve students in the district [Section 1116(e)(2)(A)(iii); 34 C.F.R. §200.37(b)(5)(ii)(B)]. 	<ul style="list-style-type: none"> ▪ <i>Dated copy of notification letter sent home to parents/guardians for each school required to offer SES</i> ▪ <i>Additional District Records (as requested)</i>
<p>ACCESSIBILITY OF SERVICES: Does the district ensure that all eligible parents/guardians and their children have access to the information they need to make informed decisions for their child and participate as partners in their child’s education?</p>	<p>EVIDENCE</p>
<ul style="list-style-type: none"> ▪ The district provides more than one enrollment window, at separate points during the school year, in order to expand SES enrollment opportunities for families, or allows enrollment throughout the year. ▪ The district has a process to help parents choose a provider, if requested [Section 1116(e)(2)(B); 34 C.F.R. §200.46(a)(2)]. ▪ The district offers parents a genuine opportunity to consult on the terms of their child’s individual student agreement. ▪ The district has fair and equitable procedures for serving students if not all students can be served [Section 1116(e)(2)(C); 34 C.F.R. §200.46(a)(3)]. ▪ The district ensures that eligible students with disabilities and LEP students receive appropriate services [34 C.F.R. §200.46(a)(4), (5)]. ▪ The district assists the State in identifying potential providers within the district [Section 1116(e)(4)(A); 34 C.F.R. §200.46(a)(2)]. ▪ The district protects the privacy of students who are eligible for or receive SES [Section 1116(e)(2)(D); 34 C.F.R. §200.46(a)(6)]. 	<ul style="list-style-type: none"> ▪ <i>Copies of policies for outreach, enrollment and student selection</i> ▪ <i>Additional District Records (as requested)</i>

Supplemental Educational Services (Selected Districts Only)	
<p>SERVICE DELIVERY: Has the district entered into agreements with providers selected by parents of eligible students [Section 1116(e)(3); 34 C.F.R. §200.46(b)] that ensures high quality services are delivered in a safe, healthy environment?</p>	<p>EVIDENCE</p>
<ul style="list-style-type: none"> ▪ Agreements contain specific achievement goals for the student, developed in consultation with the student’s parents and the provider [Section 1116(e)(3)(A); 34 C.F.R. §200.46(b)(2)(i)(A)]. ▪ Agreements contain a description of how the student’s progress will be measured and how the student’s parents and teachers will be regularly informed of that progress [Section 1116(e)(3)(A), (B); 34 C.F.R. §200.46(b)(2)(i)(B), (ii)]. ▪ Agreements contain a timetable for improving the student’s achievement [Section 1116(e)(3)(A); 34 C.F.R. §200.46(b)(2)(i)(C)]. ▪ Agreements contain a provision for terminating the agreement if the provider fails to meet the student’s specific achievement goals and timetables [Section 1116(e)(3)(C); 34 C.F.R. §200.46(b)(2)(iii)]. ▪ Agreements contain a provision governing payment for the services, which may include provisions addressing missed sessions [Section 1116(e)(3)(D); 34 C.F.R. §200.46(b)(2)(iv)]. ▪ Agreements contain a provision prohibiting the provider from disclosing to the public the identity of any student eligible for or receiving SES without the written permission of the student’s parents [Section 1116(e)(3)(E); 34 C.F.R. §200.46(b)(2)(v)]. ▪ Agreements contain an assurance that SES will be provided consistent with applicable health, safety, and civil rights laws [Section 1116(e)(5)(C)]. 	<ul style="list-style-type: none"> ▪ <i>Copies of contracts/agreements entered into with providers that specify billing procedures, guidelines concerning use of school facilities, and other logistics</i> ▪ <i>Additional District Records (as requested)</i>
<p>EQUITY AND ACCESS: If the district spent less than the amount needed to meet its 20 percent obligation for SES, it meets the below criteria:</p>	<p>EVIDENCE</p>
<ul style="list-style-type: none"> ▪ The district partners, to the extent practicable, with outside groups, such as faith-based organizations, other community-based organizations, and business groups, to help inform eligible students and their families of the opportunities to transfer or to receive SES [34 C.F.R. §200.48(d)(2)(i)]. ▪ The district ensures that eligible students and their parents have a genuine opportunity to sign up to transfer or to obtain SES, including by: (a) providing timely, accurate notice to parents; (b) ensuring that sign-up forms for SES are distributed directly to all eligible students and their parents and are made widely available and accessible through broad means of dissemination, such as the Internet, other media, and communications through public agencies serving eligible students and their families; and (c) providing a minimum of two enrollment windows, at separate points in the school year, that are of sufficient length to enable parents of eligible students to make informed decisions about requesting SES and selecting a provider [34 C.F.R. §200.48(d)(2)(i)]. ▪ The district ensures that eligible SES providers are given access to school facilities, using a fair, open, and objective process, on the same basis and terms as are available to other groups that seek access to school facilities [34 C.F.R. §200.48(d)(2)(i)]. ▪ The district maintains records that demonstrate it has met the criteria above [34 C.F.R. §200.48(d)(2)(ii)]. ▪ The district notifies the State that it has met the above criteria, intends to spend the remainder of its 20 percent obligation on other allowable activities, and gives the amount of that remainder [34 C.F.R. §200.48(d)(2)(iii)]. 	<ul style="list-style-type: none"> ▪ <i>Dated copy of notification letter(s) sent home to parents/guardians for each school required to offer SES</i> ▪ <i>Copies of enrollment and outreach policies</i> ▪ <i>Copies of contracts/agreements entered into with providers that specify billing procedures, guidelines concerning use of school facilities, and other logistics</i> ▪ <i>Title I Grant Application and</i>

Supplemental Educational Services (Selected Districts Only)	
	<p><i>related amendments (on file with the Department)</i></p> <ul style="list-style-type: none">▪ <i>Additional District Records (as requested)</i>