

# Title I Updates

For District Staff Responsible for Title I Programs



## Quarterly Updates

The goal of these updates is to provide you with timely reminders of your responsibilities under Title I and guidance to help you meet those responsibilities, all in an easily accessible format. This update focuses on the period between the 2008-09 and 2009-10 school years. Our next update in September will focus on the start of the 2009-10 school year. As always, your feedback regarding the usefulness of these updates is encouraged.

Note that this update corresponds approximately to the activities described on page 9 of the *Title I: Year at a Glance* posted at [www.doe.mass.edu/titlei/year.html](http://www.doe.mass.edu/titlei/year.html).

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## Fiscal Issues

### Title I Funding Under the American Recovery and Reinvestment Act (ARRA)



This spring ESE staff gave presentations around the state on the availability of funds under the federal American Recovery and Reinvestment Act of 2009 (ARRA). Districts receiving Title I funds under the Act have an unprecedented opportunity to use these funds to help improve education for at-risk students and close achievement gaps. The first portion of this 2-year award became available this spring, and the second portion will be available in the fall of 2009.

ARRA funds must be used in accordance with existing Title I, Part A rules and regulations, including the requirements for determining school-level eligibility and school-level allocations (Form 1) and for calculating per-pupil amounts and reservation of funds (Form 2).

While district proposals for expenditures of ARRA funds will be accepted on a rolling basis, eligible districts should consider the following general guidelines: (1) Districts can submit an application for some or all of portion 1 now; (2) Districts should apply for some or all of portion 1 in summer/early fall; and (3) Districts must apply for at least some of the total of portions 1 and 2 by December 31, 2009. Districts will amend up their initial application when applying for their second portion of ARRA funds.

For more information about ARRA, see the Department's ARRA website at: [www.doe.mass.edu/arra](http://www.doe.mass.edu/arra).

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Questions, comments, or feedback? Email us at [titlei@doe.mass.edu](mailto:titlei@doe.mass.edu)

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## Fiscal Issues (Continued)

### FY10 NCLB Allocation Amounts

In a July 10, 2009 ON THE DESKTOP memorandum from the Commissioner to Superintendents, Charter School Leaders, and Title I Directors, we announced “regular” FY 2010 federal Title I allocation amounts. An accompanying Microsoft Excel workbook details district Title I, Part A allocations and district and state Neglected and Delinquent (Title I, Part D) allocations by site. The workbook also contains a spreadsheet comparing district Title I, Part A FY 2010 allocations, including American Recovery and Reinvestment Act (ARRA) Title I funds, to Title I, Part A FY 2009 allocations.

While Massachusetts’ statewide FY 2010 regular allocation increased by approximately \$11 million as compared to FY 2009, as occurs every year a number of districts received regular FY 2010 Title I grants that were substantially more or less than in FY 2009. We strongly encourage districts eligible for Title I ARRA funds to continue to think strategically about their overall Title I amounts and to use as much of the ARRA funds as possible for investment purposes. We understand, however, that districts that received unexpected decreases in their regular allocations may choose to use a portion of their ARRA funds for “Recovery” purposes.

### Time and Effort Records

Districts are required to maintain "time and effort" records for all personnel funded through 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 are required to sign records on a semi-annual basis (twice a year). By this time you should have collected, or be in the process of collecting, these signed semi-annual certifications.

### Redesigned FY10 Title I, Part A Budget Workbook

New for FY10 is a modified Title I, Part A Budget Workbook. In prior years, ESE required districts to submit a consolidated budget workbook that contained worksheet tabs for Title I as well as Titles II-A, II-D, III, and IV. Although you should continue to coordinate the use of these funds with other federal, state, and local funds, in FY10 you will submit separate budget workbooks for each entitlement being applied for. The Title I, Part A Budget Workbook has the following new features:

- A Table of Contents worksheet tab provides detailed, step-by-step instructions for completing your budget.
- After determining Title I school eligibility (Form 1), school-level allocation amounts (Form 1), and reservation amounts (Form 2), you will describe each of the activities you propose to fund by responding to a few narrative questions, and then classify them according to one or more of the following five categories: *Educator Quality and Effectiveness, Support and Intervention, Assessment and Data Systems, College and Career Readiness, or Other (including grant administration).*
- As you enter budget information on one or more worksheet tabs based on your district's proposed activities, this information will transfer automatically to the Budget Page worksheet tab to create a combined total budget.

*Final allocation amounts, budget workbooks, and supporting materials for Titles I, II-A, II-D, III, and IV are posted at [www.doe.mass.edu/nclb/grant/](http://www.doe.mass.edu/nclb/grant/).*

*By this time of the year you should have collected signed semi-annual certifications. For more information, including sample forms, visit: [www.doe.mass.edu/titlei/fiscal/?section=time](http://www.doe.mass.edu/titlei/fiscal/?section=time)*

*The total number of activities you describe will be determined in part by the size of your district's Title I allocation and the range of activities you propose to fund. Your district is not required to fund activities in every category, and you may fund more than one activity in a particular category.*

For more information on providing equitable services to eligible non-public school students, teachers, and other educational personnel, visit

[www.doe.mass.edu/titlei/students/?section=private](http://www.doe.mass.edu/titlei/students/?section=private)

## Non-Public School Outreach and Consultation

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

Moreover, beginning in FY10 your district is also required to obtain written affirmation that timely and meaningful consultation has occurred with officials from each private school **that has elected to participate** in the district's Title I program in SY2009-10. To document that this consultation has occurred, we have prepared *Form 7: Affirmation of Consultation with Participating Private Schools*. One copy of this form must be submitted to ESE with the district's FY10 Title I grant application for each private school in which the district will provide Title I services in SY2009-10.

## Planning on Changing from a Targeted Assistance to a Schoolwide Program?

Both the guidance and form are posted to the Title I website at [www.doe.mass.edu/titlei/programs/](http://www.doe.mass.edu/titlei/programs/)

A school that will conduct a targeted assistance program in the coming school year but is planning to conduct a schoolwide program in the following year must meet certain eligibility and planning requirements. We have prepared guidance to assist districts in initiating this change, entitled *Title I Program Change Procedure: Targeted to Schoolwide*. If your district intends to convert a targeted assistance program that meets schoolwide eligibility requirements (e.g., 40% poverty rate) into a schoolwide program in SY2010-11, an authorized signatory from the district must sign and submit the form entitled *Title I Schoolwide Program: Justification and Assurances* to ESE with your district's Title I application.

## June 4, 2009 Technical Assistance Meeting

PowerPoint presentations and other materials from the sessions are available at [www.doe.mass.edu/titlei/](http://www.doe.mass.edu/titlei/)

The Department held a Title I Technical Assistance session in Marlborough on June 9. ESE staff gave whole-and small-group presentations on a variety of topics of interest to Title I Directors, including: Title I Forms 1 and 2, Parent/Guardian Involvement, Uses of ARRA Funds, Supplemental Educational Services (SES) and NCLB School Choice, and Student Selection / Private Schools. Materials from this meeting are posted to our Title I website at [www.doe.mass.edu/titlei/](http://www.doe.mass.edu/titlei/).

## FY09 Title I Program Review Update

We would like to thank all districts that were scheduled for an FY09 Title I Program Review for submitting their documentation. ESE staff are currently reviewing this information and will notify you of findings and required actions, if any, this summer. Title I Program Reviews, conducted every six years, provide the Department with information about the implementation of your Title I program. To see if your district is scheduled for an FY10 Title I Program Review, visit [www.doe.mass.edu/pqa/review/cpr/6yrcycle.html](http://www.doe.mass.edu/pqa/review/cpr/6yrcycle.html).

## Title I and Supplemental Educational Services (SES) Data Collections

In accordance with federal Title I reporting requirements, ESE is required to collect certain information and data from districts receiving Title I funds. Whenever possible, we are working to streamline its data collections using electronic submissions. The intent is to save school and district staff valuable time that can otherwise be spent on the analysis and planning of Title I programs. There are three important data collections that you need to be aware of this year: the **Title I Data Collection** (formerly the Title I Performance and Achievement Report), the **Supplemental Educational Services (SES) Data Collection**, and the **SES Title I Director Satisfaction Survey**.

### Title I Data Collection

ESE collects certain information about Title I programming at the district and school level through the Title I Data Collection Application, which allows authorized district personnel to submit this information to ESE electronically via the online Security Portal. Districts are required to submit much of the same data as was required for the paper-based Title I Performance and Achievement Report prior to 2008. District personnel with the Title I Grant Applications and Amendments Drop Box security role can access the Title I Data Collection Application. The Directory Administrator in your district assigns this role. A list of Directory Administrators in each district is available at [www.doe.mass.edu/InfoServices/data/diradmin/list.asp](http://www.doe.mass.edu/InfoServices/data/diradmin/list.asp).

### Supplemental Educational Services (SES) Data Collection

Additionally, districts that were required to offer Supplemental Educational Services (SES) to eligible students in SY2008-09 must also maintain data on student participation in SES and submit these data to ESE at the end of the year. ESE, in turn, reports these data to the federal government. These data are a critical means of evaluating the effectiveness and impact of SES programs. The SES Data Collection Application is an online tool developed by ESE that contains pre-populated rosters of all students in the district who were eligible to receive SES for the current school year. Districts access their rosters through the ESE Security Portal, enter certain information on student participation in SES, and then submit these data to ESE at the end of the school year. District personnel with the SES Data Collection security role can access the SES Data Collection Application. District personnel should contact the Directory Administrator to assign the SES Data Collection role in order to access the application. A list of Directory Administrators in each district is available at [www.doe.mass.edu/InfoServices/data/diradmin/list.asp](http://www.doe.mass.edu/InfoServices/data/diradmin/list.asp).

*The deadline for submitting the online SES Title I Director Satisfaction Survey was July 3, 2009, and the deadline for submitting data via the Title I and SES Data Collection Applications, respectively, is August 31, 2009.*

*Send feedback and support questions about the Title I Data Collection Application to [titlei@doe.mass.edu](mailto:titlei@doe.mass.edu).*

*Send feedback and support questions about the SES Data Collection Application to [sesproviders@doe.mass.edu](mailto:sesproviders@doe.mass.edu).*

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*Having difficulty accessing the data collection applications in the ESE Security Portal? Contact your Directory Administrator, who will assign the appropriate security role to allow you to access the applications. A complete list of Directory Administrators in each district is available at [www.doe.mass.edu/InfoServices/data/diradmin/list.asp](http://www.doe.mass.edu/InfoServices/data/diradmin/list.asp).*

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## Title I Program Evaluation

The end of the school year is time to evaluate your district's Title I program. 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. Evaluation data—such as periodic and summative student assessment data—and staff and parent surveys are used to evaluate the strengths and weaknesses of the program's impact on raising student achievement and in productively involving parent/guardians in their children's education. The evaluation must reflect Adequate Yearly Progress (AYP) data for the district and all Title I schools. You can find a sample program evaluation procedure and summary at: [www.doe.mass.edu/titlei/monitoring/samples.html](http://www.doe.mass.edu/titlei/monitoring/samples.html).

*The end-of-year program evaluation leads into a process for assessing needs, which we will address in our next quarterly update.*

This is also an appropriate time of year to evaluate your district's parent involvement policies and procedures, services for private school students and teachers, and your district's coordination of Title I services with local neglected and delinquent facilities, if appropriate. Resources are available at [www.doe.mass.edu/titlei/parents.html](http://www.doe.mass.edu/titlei/parents.html) and [www.doe.mass.edu/titlei/students/?section=all](http://www.doe.mass.edu/titlei/students/?section=all).

## Preparing for the Upcoming School Year

### Coordinating Services with Neglected/Delinquent Facilities

Districts receive grants to serve children in Neglected/Delinquent community residential facilities (Title I, Part D Subpart 2 grants) within the district's geographic boundaries. Districts receiving these grants must enter into a formal written agreement with community residential facilities working with neglected/delinquent children and youth to ensure that the children and youth are participating in an education program that is comparable to the one the district operates in the school that such children and youth would otherwise attend. The formal agreement must stipulate details regarding the program(s) to be provided as well as billing terms. Spring is an appropriate time to review current agreements with local N/D facilities and collaborate with them to establish agreements for the upcoming school year.

### Preparing for NCLB School Choice

Districts are required to notify the parents/guardians of all children in Title I schools identified for improvement, corrective action, or restructuring of the option to transfer to another school in the district not identified for improvement, if such an option exists. As it takes two years of making AYP for all student groups for a school to exit improvement status, districts know now – in many cases – if a school in their district will be required to offer NCLB school choice in 2009-010. This year the U.S. Department of Education requires districts to ensure that the parents/guardians of students in Title I schools that will have an improvement status in 2009-2010 are notified **at least 14 days prior to the start of the school year**. (Parents/guardians of children attending other schools must receive this information no later than the start of the school year.)

Districts should begin planning for school choice now. In addition to taking stock of schools which might be able to receive transfer students and establishing a schedule for notifying all parents/guardians of children in identified schools, districts should set aside appropriate funds in the FY10 Title I budget application, begin notifying parents/guardians of children in Title I schools that will remain in improvement status in 2009-10 and arrange for transfers, as appropriate.

*Additional information and resources on serving neglected, delinquent and at-Risk youth are available at [www.doe.mass.edu/titlei/students/?section=ndr](http://www.doe.mass.edu/titlei/students/?section=ndr)*

*On February 26, 2009, we posted data on the number of students in each district who were eligible for and participated in choice and SE) in Massachusetts public schools during the 2007-08 school year. This summer we will also post a list of schools that were open in SY 2008-09 that will or may be required or may be required to offer choice or SES in SY 2009-10.*

*Resources regarding NCLB school choice, including a link to the U.S. Department of Education's useful publication, *Giving Parents Options*, are available at [www.doe.mass.edu/nclb/choice.html](http://www.doe.mass.edu/nclb/choice.html).*

### Preparing for Supplemental Educational Services (SES)

*Information about the State's SES program, including application materials, may be accessed from our website at [www.doe.mass.edu/ses/](http://www.doe.mass.edu/ses/).*

*Please send all questions regarding the application process via email to John Desses, State SES Coordinator, at [sesproviders@doe.mass.edu](mailto:sesproviders@doe.mass.edu).*

As with NCLB school choice, in many cases districts know now which Title I schools will remain identified for improvement (year 2), corrective action, or restructuring and thus will be required to offer supplemental educational services (SES) to the parents/guardians of all low income children in the school. In addition to identifying schools that may or will have to offer services in 2009-10 and preparing notification and application materials, districts should: (A) inform building principals about SES; (B) reserve funds for SES and school choice in FY10 Title I budget application; and (C) review the list of approved SES providers and make preliminary contact with them.

## Schools and Districts with an NCLB Accountability Status Eligible to Apply to Become SES Providers for the 2009-2010 School Year

As you know, NCLB regulations have to date prohibited districts or schools with an NCLB accountability status (improvement, corrective action, or restructuring) from serving as providers of supplemental educational services (SES). This spring, however, U.S. Secretary of Education Arne Duncan indicated his intention to grant waivers to states to allow schools and districts with an NCLB accountability status to apply to become SES providers for the 2009-2010 school year.

Details regarding the waiver process have just been released, and ESE is beginning the waiver application process. We expect to approve schools and/or districts identified for improvement or corrective action that, like any prospective SES provider, follow the State's regular SES application process and meet all of the State's approval requirements.

If your school or district is interested in receiving conditional approval to become an approved SES provider in 2009-2010, we will be hosting an in-person Bidders' Conferences on Friday, August 7, 2009 to assist all prospective providers with the application process. To benefit from this opportunity, we encourage you to complete as much of these materials as possible in advance of the sessions. All sessions will be held from 9:00 a.m. to 1:00 p.m. in Room 137A in Malden.

Please keep in mind that our conditional approval cannot become final until the U.S. Department of Education (ED) grants a waiver of this provision for Massachusetts. If our waiver request ultimately does not receive approval from ED, then we must consider all conditional approvals null and void.

## **NEW: Amended Federal Guidance Concerning the Use of Unspent Title I Funds Reserved for NCLB School Choice and Supplemental Educational Services (SES)**

In our Winter Update we notified you that on October 20, 2008 the U.S. Department of Education amended certain regulations governing the Title I program. Among those amendments is a requirement that districts must demonstrate that students and their parents have had a genuine opportunity to transfer to another school or obtain Supplemental Educational Services (SES) before the district uses unspent funds from its 20 percent Choice/SES reservation for other allowable activities.

In accordance with these regulations, we have included a statement in the FY10 Amendment form for Title I, Part A and Title I - ARRA grant applications requiring the district to certify that if it intends to spend less than the amount needed to meet its 20 percent obligation on choice-relation transportation and SES in a given school year, the district meets the following criteria: (1) The district has partnered, to the extent practicable, with outside groups to help inform eligible students and their families of the opportunities to transfer or to receive SES; (2) The district has ensured that eligible students and their parents had a genuine opportunity to sign up to transfer or to obtain SES; (3) The district has ensured that eligible SES providers were 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; and (4) the district maintains records that it has met these criteria.

The amended regulations require districts to offer at least two SES enrollment windows of sufficient length and at separate points in the school year. Therefore, ESE would not expect the district to amend its FY10 Title I Grant Application to use a portion of its 20 percent reservation for other allowable activities prior to December or January.

## Title I Calendar at a Glance

### April

Submit requests to amend grants, as needed.

Collect signed Time & Effort records for split-funded staff.

Collect Title I data for submission via the Department's Title I Data Collection Application on the ESE Security Portal.

### May

Submit requests to amend grants, as needed.

Collect signed Time & Effort records for split-funded staff.

Conduct program evaluation & write a summary of that evaluation.

Conduct needs assessment based on findings of program evaluation.

### June

Disseminate 2008-09 NCLB Report Cards to all parents prior to the end of the school year.

Submit requests to amend grants, as needed.

Collect signed Time & Effort records for split-funded staff.

Collect semi-annual certifications (2 of 2) for Title I personnel whose compensation is funded solely from Title I.

Review & update supplement, not supplant policy & procedure, if needed.

Review & update district parent / guardian involvement policy based on data (e.g., evaluations).

Review & update school - parent/guardian compact.

Prepare to implement NCLB School Choice & SES for the following school year (if applicable).

### July

Submit district's Title I grant application to the Department.

### August

Send notifications to parents/parents of children attending schools in the district identified for improvement, corrective action, or restructuring status.

For Title I questions: [titlei@doe.mass.edu](mailto:titlei@doe.mass.edu) / 781-338-6230

For AYP-related questions: [ayp@doe.mass.edu](mailto:ayp@doe.mass.edu) / 781-338-3550

For SES-specific questions: [sesproviders@doe.mass.edu](mailto:sesproviders@doe.mass.edu) / 781-338-6328

*Learn more about these activities in Title I: Year at a Glance, posted on the Department's website at [www.doe.mass.edu/titlei/year.html](http://www.doe.mass.edu/titlei/year.html)*



## Spotlight: Preliminary Schedule for Release of Spring 2009 MCAS and AYP Results

On June 5, 2009 Commissioner Chester released a preliminary schedule for the release of 2009 MCAS and AYP results: [www.doe.mass.edu/news/news.asp?id=4835](http://www.doe.mass.edu/news/news.asp?id=4835).

In mid-August ESE will notify via email and regular mail superintendents and principals whose schools are expected to be identified for improvement, corrective action, or restructuring based on preliminary 2009 AYP data. Using this information, districts must:

- **Send letters to the parents/guardians of children attending all schools in the district identified for improvement, corrective action, or restructuring status**—whether or not the school receives Title I funds—that give parents/guardians an explanation of what the identification means, the reason(s) for the identification, and how they can become involved in addressing the academic issues that led to identification. This notification is also required if the district is identified for improvement or corrective action.
- **Ensure that parents/guardians of students in schools identified for improvement, corrective action, or restructuring status that are receiving Title I funds in 2009-10** are offered NCLB school choice and/or supplemental educational services (SES).
- **Ensure that parents/guardians of students in Title I schools that will have an improvement status in 2009-2010 are notified at least 14 days prior to the start of the school year.** (Parents/guardians of children attending other schools must receive this information no later than the start of the school year.)

Additional information will be posted to the ESE website at [www.doe.mass.edu/sda/ayp/2009](http://www.doe.mass.edu/sda/ayp/2009).