



MASSACHUSETTS  
Department of Elementary  
and Secondary Education

**Lincoln**  
**(LEA Code: 0157)**

## **ESSA Federal Grant Program Monitoring (I, IIA, and IVA)**

### **Monitoring Outcomes Report**

**Issued: June 13, 2025**  
**Last Updated: January 12, 2026**

**Federal Grant Programs Team**  
**Resource Allocation Strategy and Planning Office**



Patrick Tutwiler  
Interim Commissioner

# MEMORANDUM

**To:** Lincoln, Title I, IIA, and IVA Directors in FY 2024 Monitoring Cohort

**From:** Simone Lynch, Director of Federal Grant Programs

**Date:** June 13, 2025

**Subject:** Notice of FY 2024 ESSA (Titles I, IIA, and IVA) program monitoring required actions

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Thank you for submitting materials for your district's FY 2024 federal grant program monitoring review. Our federal grants program staff members have reviewed the materials your district submitted and, in certain cases, have requested and obtained additional documentation from your district.

All district submissions, record of review, and the district's monitoring outcomes report are located in the Communication Hub and Monitoring Portal (CHAMP). The report lists all review criteria and indicates which requirements were fulfilled and which had findings. Criteria with findings include a description of the finding, required action, and a deadline for submission of evidence that the required action to address the finding is complete.

Evidence of required actions must be uploaded in CHAMP by **October 10, 2025** in the same manner that initial submission of documentation was uploaded by the district's monitoring contact person.

The federal government, the Department (DESE), and the district all have an interest in seeing that actions taken to address findings are sufficient and that compliance with grant program requirements is sustained beyond completion of this monitoring review. To this end, your ESSA grant monitoring reviewer will be in contact as needed to provide your district support. Support and oversight can range from phone contact and online meetings to in-person visits and required in-depth technical assistance activities.

If you have any questions or concerns, please contact your ESSA grant monitoring reviewer.

# Monitoring Outcomes Report

Criteria	Finding	Requirement Fulfilled	Required Action Resolved (if applicable)
1-A Title I Needs Assessment	Yes		10/09/2025
1-B Title IIA Needs Assessment	Yes		10/09/2025
1-D Submission of Annual ESSA Grant Application		Yes	
1-E-1 Private School Outreach	Yes		12/22/2025
1-G Equitable Access to Excellent Educators	Yes		01/05/2026
2-A Maintenance of Effort		Yes	
2-B Comparability of Services	Yes		10/20/2025
2-C Title I Supplement, Not Supplant		Yes	
2-D Supplement, Not Supplant for Targeted Assistance Schools	Yes		10/15/2025
2-F Reservation of Title I Funds		Yes	
3-A Title I Family/Guardian Notification		Yes	
3-B Title I Family/Guardian Engagement	Yes		12/22/2025
3-C Title I Family/Guardian Outreach and Involvement	Yes		10/15/2025
4-A Title I Evaluation	Yes		01/12/2026
4-C Title I Targeted Assistance Programs	Yes		01/12/2026
5-A Title I Selection and Allocation		Yes	
6-A Title I Student Access	Yes		10/15/2025
7-A Title IIA Allowable Activities		Yes	
7-B Title IIA Supplement, Not Supplant		Yes	
8-A Title IIA Allocating Funds		Yes	
9-A Professional Growth and			

Improvement		Yes	
10-A Title IIA Program Activities Evaluation	Yes		01/12/2026
11-A Title IVA Direct Administrative Costs		Yes	
11-B Title IVA Supplement, not Supplant		Yes	
12-A Title IVA Distribution of Funds	Yes		12/22/2025
13-A Title IVA Program Activities Evaluation	Yes		01/12/2026

1-A Title I Needs Assessment	Finding
<b>Requirements</b>	
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 assessments are used to determine type of programs and services to be provided to eligible students.	
<b>Legal Standards</b>	
ESEA §§1114~1115	
<b>Finding Description</b>	
District did not submit a copy of the most current, dated summary of the district's procedure for assessing areas of greatest academic need.	
<b>Required Action</b>	
Submit a copy of the most current, dated summary of the district's procedure for assessing areas of greatest need (must include reference to Title I and Title IIA and how this fund use is determined based on needs assessment).	
<b>Deadline for Submission of Evidence</b>	
Jul 18, 2025	

1-B Title IIA Needs Assessment	Finding
<b>Requirements</b>	
District conducts an annual needs assessment and meaningfully consult with teachers, principals, other school leaders, paraprofessionals, specialized instructional support personnel, parents, community partners, and other organizations with relevant and demonstrated expertise in programs and activities to determine and inform the types of services to be provided.	
<b>Legal Standards</b>	

ESEA § 2102 (B)(3)

### **Finding Description**

District did not submit a copy of the most current, dated summary of the district's procedure for assessing areas of greatest academic need.

### **Required Action**

Submit a copy of the most current, dated summary of the district's procedure for assessing areas of greatest need (must include reference to Title I and Title IIA and how this fund use is determined based on needs assessment).

### **Deadline for Submission of Evidence**

Jul 18, 2025

## **1-E-1 Private School Outreach**

**Finding**

### **Requirements**

Private School Outreach:

The district consults with appropriate private school officials regarding services for eligible private school children and maintains records of outreach and responses from each eligible private school.

### **Legal Standards**

ESEA §§1117; 8306

### **Finding Description**

District did not provide evidence that offers of consultation were received by private school officials at all eligible private schools.

### **Required Action**

Submit evidence that spring distribution of offers of consultation for school year 2025-26 participation were received by eligible private schools.

### **Deadline for Submission of Evidence**

Sep 19, 2025

## **1-G Equitable Access to Excellent Educators**

**Finding**

### **Requirements**

Equitable Access to Excellent Educators: The district works to identify and address any disparities that result in historically disadvantaged student groups being taught at higher rates than other students by lower rated, inexperienced, or out-of-field teachers.

1. How is the district closing any inequities in the rates at which low-income students, students of color, English learners, and students with disabilities are taught by lower rated, out-of-field, or inexperienced teachers?
2. How are plans to address these inequities based in local data?

### **Legal Standards**

ESEA § 1111(g)(1)(B)

## **Finding Description**

The district did not submit sufficient documentation related to identified gaps in equitable access to excellent educators.

## **Required Action**

Submit plans to address the specific equity gaps identified in the 3-year Student Learning Experience (SLE) report.

## **Deadline for Submission of Evidence**

Oct 10, 2025

<b>2-B Comparability of Services</b>	<b>Finding</b>
<b>Requirements</b>	
Comparability of Services: District has and follows a written comparability reporting procedure. District's comparability demonstration 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 demonstration shows 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.)	
<b>Legal Standards</b>	
ESEA §1118(c)	
<b>Finding Description</b>	
1. The district did not submit a comparability procedure. 2. The district is not meeting Title I comparability.	
<b>Required Action</b>	
1. Submit the Title I comparability procedure. 2. Submit the Title I comparability demonstration for the 2025-26 school year, showing that the district meets comparability (some staffing shifts may be necessary in order to meet comparability).	
<b>Deadline for Submission of Evidence</b>	
Oct 10, 2025	

<b>2-D Supplement, Not Supplant for Targeted Assistance Schools</b>	<b>Finding</b>
<b>Requirements</b>	
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.	
<b>Legal Standards</b>	
ESEA §§1118(b); 1114~1115	

## **Finding Description**

It cannot be determined whether the district has met this criterion since the district did not submit Title I student selection procedure, selection criteria, or rank ordered lists.

## **Required Action**

See criterion 4-C.

## **Deadline for Submission of Evidence**

Aug 01, 2025

## **3-B Title I Family/Guardian Engagement**

## **Finding**

### **Requirements**

District and schools develop jointly with, annually evaluate and update with, and distribute to families/guardians written family/guardian engagement policies and school-family/guardian compacts.

- Family/Guardian engagement policies describe specific rights of families/guardians and the information and meaningful activities developed with families/guardians so the entire community is prepared to participate in student educational growth. Policies must also describe how families/guardians are involved in an annual evaluation of the effectiveness of the family/guardian engagement in improving academic achievement.
- School-family/guardian compacts are agreements between the entire school and the home (families/guardians) that describe the responsibilities of each party, including the student, if desired.

### **Legal Standards**

ESEA §§1111-1112; §§1114-1116

## **Finding Description**

1. District did not submit Title I family engagement policies for the district or the Title I school. 2. The district did not submit a school/family compact for the Title I school.

## **Required Action**

1. Submit Title I district and school-level family/guardian engagement policies including documentation that the policies were reviewed by parents/guardians.
2. Submit the school year 2025-26 Title I school-family/guardian compact for the Title I school.

## **Deadline for Submission of Evidence**

Oct 10, 2025

## **3-C Title I Family/Guardian Outreach and Involvement**

## **Finding**

### **Requirements**

Schools conduct meetings at least annually to inform participating families/guardians of students about Title I programs. District and its schools develop materials and implement training/meeting time for Title I families/guardians to understand and collaborate on:

- The state's academic content standards and state student academic achievement standards;
- State and local academic assessments, including alternative assessments;
- The family/guardian engagement requirements of section 1116; and
- Sharing best practices and resources with families/guardians on how to monitor and improve student academic progress and achievement

Additionally, districts and schools provide accessible tools to assist all families in understanding and collectively supporting student improvement and achievement.

### **Legal Standards**

ESEA §§1111-1112; §§1114-1116

### **Finding Description**

1. District did not provide a dated notice to parents informing them of the annual Title I meeting where information about State academic standards, assessments, and parental involvement requirements and opportunities for involvement were discussed. 2. The district did not submit sufficient evidence to show that the Title I school has provided accessible tools to help build capacity among families in understanding and collectively supporting student improvement and achievement.

### **Required Action**

1. Provide the dated notice to parents informing them of the annual Title I meeting where information about State academic standards, assessments, and parental involvement requirements and opportunities for involvement were discussed for the 2025-26 school year. 2. Submit evidence that the Title I school provides parents/families with communications, resources, workshops, trainings, etc. to help them build capacity to understand and improve their child's academic achievement. Evidence may include copies of meeting agendas, workshop flyers, sign-in sheets, newsletters and other documentation that demonstrates the district is providing accessible tools to assist all families/guardians in understanding the state's high standards, as well as sharing best practices and resources with families on how to monitor and improve student academic progress and achievement.

### **Deadline for Submission of Evidence**

Oct 10, 2025

<b>4-A Title I Evaluation</b>	<b>Finding</b>
<b>Requirements</b>	
The district evaluates the Title I plan at least on an annual basis and makes necessary revisions to reflect substantial changes in the direction of Title I program(s). The evaluation reflects accountability data for the district and all Title I schools.	
<b>Legal Standards</b>	
ESEA §§1112; 1114~1116; 1431(a)	
<b>Finding Description</b>	
The district did not submit a Title I evaluation procedure or a Title I program evaluation summary.	
<b>Required Action</b>	
1. Submit a written summary of the 2024-25 school year Title I program evaluation, including indicators of impact on student achievement, strengths and weaknesses of the program, and subsequent program changes. 2. Submit a detailed plan for how you will carry out the 2025-26 Title I program evaluation, including the timeline of steps involved, data collected and analyzed to gauge impact, individuals responsible for each step, and stakeholders consulted. Include in your plan how you will collaborate with participating private schools to evaluate services. Participate in targeted technical assistance on program evaluation as required by the Federal Grant Programs office.	

## Deadline for Submission of Evidence

Sep 19, 2025

### 4-C Title I Targeted Assistance Programs

Finding

#### Requirements

Targeted Assistance Programs:

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:

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.

#### Legal Standards

ESEA §1115

#### Finding Description

District did not submit 1) Title I student selection procedure; 2) Title I selection criteria showing the assessments used and composite scoring to determine Title I participation; and 3) Title I rank-ordered lists to show student participation in Title I based on highest academic need.

#### Required Action

1. Submit the district's SY2024-25 Title I student selection procedure for the Title I summer program.
2. Submit the district's SY2024-25 Title I selection criteria for selection into the Title I summer program.
3. Submit the district's SY2024-25 Title I ranked-ordered student selection lists for students selected into the Title I summer program.

## Deadline for Submission of Evidence

Aug 01, 2025

### 6-A Title I Student Access

Finding

#### Requirements

All Students:

District identifies as eligible for Title I services students with disabilities, English language learners, 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.

#### Legal Standards

ESEA §1115

#### Finding Description

It cannot be determined whether the district has met this criterion since the district did not submit Title I student selection procedure, selection criteria, or rank ordered lists.

### **Required Action**

See criterion 4-C.

### **Deadline for Submission of Evidence**

Aug 01, 2025

## **10-A Title IIA Program Activities Evaluation**

**Finding**

### **Requirements**

Professional development and other activities funded with Title IIA funds must use data and ongoing evaluation to continually update and improve activities.

### **Legal Standards**

ESEA § 2102(b)(2)(D)

### **Finding Description**

The district did not submit a Title IIA program evaluation.

### **Required Action**

1. Submit a written summary of the 2024-25 school year Title IIA program evaluation, including indicators of impact on student achievement, strengths and weaknesses of the program, and subsequent program changes. 2. Submit a detailed plan for how you will carry out the 2025-26 Title IIA program evaluation, including the timeline of steps involved, data collected and analyzed to gauge impact, individuals responsible for each step, and stakeholders consulted. Include in your plan how you will collaborate with participating private schools to evaluate services. Participate in targeted technical assistance on program evaluation as required by the Federal Grant Programs office.

### **Deadline for Submission of Evidence**

Aug 29, 2025

## **12-A Title IVA Distribution of Funds**

**Finding**

### **Requirements**

Districts are required to prioritize the distribution of Title IVA funds to schools with the greatest needs, have the highest percentages or numbers of children in poverty, are identified for support and improvement, are implementing targeted support and improvement plans, or are identified as a persistently dangerous public elementary school or secondary school under section 8532.

### **Legal Standards**

ESEA §4106(e)(2)(A)

### **Finding Description**

District did not submit a sufficient explanation of how schools are prioritized to receive Title IV funds.

## Required Action

Submit a description of the process for distributing Title IVA funds that aligns with the statutory requirements: Districts are required to prioritize the distribution of Title IVA funds to schools with the greatest needs, have the highest percentages or numbers of children in poverty, are identified for support and improvement, are implementing targeted support and improvement plans, or are identified as a persistently dangerous public elementary school or secondary school under section 8532. ESEA § 4106(e)(2)(A).

## Deadline for Submission of Evidence

Jul 18, 2025

## 13-A Title IVA Program Activities Evaluation

## Finding

### Requirements

The district annually reports to the state how funds are being used and the degree to which the district has made progress toward meeting the objectives and outcomes described in its application for the use of these funds.

### Legal Standards

ESEA §4106(e)(2)(F)

### Finding Description

The district did not submit a Title IVA program evaluation.

### Required Action

1. Submit a written summary of the 2024-25 school year Title IVA program evaluation, including indicators of impact on student achievement, strengths and weaknesses of the program, and subsequent program changes.
2. Submit a detailed plan for how you will carry out the 2025-26 Title IVA program evaluation, including the timeline of steps involved, data collected and analyzed to gauge impact, individuals responsible for each step, and stakeholders consulted. Include in your plan how you will collaborate with participating private schools to evaluate services. Participate in targeted technical assistance on program evaluation as required by the Federal Grant Programs office.

## Deadline for Submission of Evidence

Aug 29, 2025