



MASSACHUSETTS  
Department of Elementary  
and Secondary Education

**Westford**  
**(LEA Code: 0326)**

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

### **Monitoring Outcomes Report**

**Issued: June 16, 2025**  
**Last Updated: December 23, 2025**

**Federal Grant Programs Team**

**Resource Allocation Strategy and Planning Office**



Patrick Tutwiler  
Interim Commissioner

# MEMORANDUM

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

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

**Date:** June 16, 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		10/29/2025
1-B Title IIA Needs Assessment	Yes		10/29/2025
1-D Submission of Annual ESSA Grant Application		Yes	
1-G Equitable Access to Excellent Educators	Yes		11/17/2025
2-A Maintenance of Effort		Yes	
2-B Comparability of Services	Yes		12/23/2025
2-C Title I Supplement, Not Supplant		Yes	
2-D Supplement, Not Supplant for Targeted Assistance Schools		Yes	
2-F Reservation of Title I Funds		Yes	
3-A Title I Family/Guardian Notification	Yes		12/05/2025
3-B Title I Family/Guardian Engagement	Yes		10/29/2025
3-C Title I Family/Guardian Outreach and Involvement	Yes		12/05/2025
4-A Title I Evaluation	Yes		12/05/2025
4-C Title I Targeted Assistance Programs	Yes		12/05/2025
5-A Title I Selection and Allocation		Yes	
6-A Title I Student Access	Yes		12/05/2025
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		12/19/2025
13-A Title IVA Program Activities Evaluation	Yes		10/29/2025

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 dated copy 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). Submit the district's FY26 needs assessment.	
<b>Deadline for Submission of Evidence</b>	
Jul 14, 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)	
<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 dated copy 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). Submit the district's FY26 needs assessment.

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

Jul 14, 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

## **2-B Comparability of Services** Finding

### **Requirements**

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.)

### **Legal Standards**

ESEA §1118(c)

### **Finding Description**

The district did not submit a comparability procedure, and the district is not meeting Title I comparability.

## **Required Action**

Submit the Title I comparability procedure. Submit the Title I comparability demonstration for the 2025-26 school year, showing that the district meets comparability.

## **Deadline for Submission of Evidence**

Oct 10, 2025

### **3-A Title I Family/Guardian Notification**

**Finding**

#### **Requirements**

District notifies family/guardian of school and district accountability status as well as right to request teacher qualification information. As applicable, district notifies families/guardian that student has been taught for four or more consecutive weeks by a teacher who does not meet licensure requirements for the grade and subject assigned to teach. Additionally, district publishes and distributes annual report cards for district and all district schools.

#### **Legal Standards**

ESEA §§1111-1112; §§1114-1116

#### **Finding Description**

Did not submit dated cover letter sent to Day Elementary and Rita E. Miller Title I families that includes the link to Westford's 2024 Report Card (posted to Westford's website).

#### **Required Action**

Submit the dated cover letter sent to Day Elementary and Rita E. Miller Title I families that includes the link to Westford's 2024 Report Card (posted to Westford's website).

## **Deadline for Submission of Evidence**

Jun 27, 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**

Did not submit district/school family engagement policies or school-family/guardian compact for each Title I school.

## Required Action

Submit Title I district and school-level family/guardian engagement policies including documentation that the policies were reviewed by parents/guardians. Submit the FY25-26 Title I school-family/guardian compact for each Title I school. Participate in technical assistance on family engagement as required by the Federal Grant Programs office.

## Deadline for Submission of Evidence

Oct 10, 2025

3-C Title I Family/Guardian Outreach and Involvement	Finding
<b>Requirements</b>	
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:	
<ul style="list-style-type: none"><li>• The state's academic content standards and state student academic achievement standards;</li><li>• State and local academic assessments, including alternative assessments;</li><li>• The family/guardian engagement requirements of section 1116; and</li><li>• Sharing best practices and resources with families/guardians on how to monitor and improve student academic progress and achievement</li></ul>	
Additionally, districts and schools provide accessible tools to assist all families in understanding and collectively supporting student improvement and achievement.	
<b>Legal Standards</b>	
ESEA §§1111-1112; §§1114-1116	
<b>Finding Description</b>	
Did not submit dated notice sent to families of the specific students received targeted assistance via Title I at Day Elementary and Rita E. Miller Elementary informing them of the 2025 annual Title I meeting. Did not submit evidence to show that the required communication and training was provided to families/guardians of Title I students to promote family/guardian involvement at each Title I targeted assistance schools in current school year and/or the previous school year.	
<b>Required Action</b>	
Submit 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 for the 2025-26 school year. Submit evidence that the Title I schools provide 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. Participate in technical assistance on family engagement as required by the Federal Grant Programs office.	
<b>Deadline for Submission of Evidence</b>	
Oct 10, 2025	

4-A Title I Evaluation	Finding
<b>Requirements</b>	
<p>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.</p>	
<b>Legal Standards</b>	
<p>ESEA §§1112; 1114~1116; 1431(a)</p>	
<b>Finding Description</b>	
<p>Did not submit Title I program evaluation procedure or Title I program evaluation summary.</p>	
<b>Required Action</b>	
<p>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. The summary should include evaluation of participating private school services as well. 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 technical assistance on program evaluation as required by the Federal Grant Programs office.</p>	
<b>Deadline for Submission of Evidence</b>	
<p>Aug 11, 2025</p>	

4-C Title I Targeted Assistance Programs	Finding
<b>Requirements</b>	
<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"> <li>1. Use effective instructional methods and strategies that strengthen the core academic program of the school;</li> <li>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);</li> <li>3. Give primary consideration to providing extended learning time for served students;</li> <li>4. Provide an accelerated, high-quality curriculum;</li> <li>5. Minimize the removal of children from the regular classroom during regular school hours.</li> </ol>	
<b>Legal Standards</b>	
<p>ESEA §1115</p>	
<b>Finding Description</b>	
<p>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.</p>	

**Required Action**

Submit the district's SY2025-26 Title I student selection procedure. Submit the district's SY2025-26 Title I student selection criteria. Submit the district's SY2025-26 Title I ranked-ordered student selection list(s) for students selected for the Title I Targeted Assistance program. Participate in technical assistance on Title I Targeted Assistance as required by the Federal Grant Programs office.

**Deadline for Submission of Evidence**

Oct 10, 2025

6-A Title I Student Access	Finding
<b>Requirements</b>  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.	
<b>Legal Standards</b>  ESEA §1115	
<b>Finding Description</b>  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.	
<b>Required Action</b>  See Criterion 4-C.	
<b>Deadline for Submission of Evidence</b>  Oct 10, 2025	

10-A Title IIA Program Activities Evaluation	Finding
<b>Requirements</b>  Professional development and other activities funded with Title IIA funds must use data and ongoing evaluation to continually update and improve activities.	
<b>Legal Standards</b>  ESEA § 2102(b)(2)(D)	
<b>Finding Description</b>  Did not submit Title IIA program evaluation summary.	
<b>Required Action</b>  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. The summary should include evaluation of participating private school services as well. 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 technical assistance on program evaluation as required by the Federal Grant Programs office.

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

Aug 11, 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**

Did not submit Title IVA program evaluation summary.

### **Required Action**

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. The summary should include evaluation of participating private school services as well. 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 technical assistance on program evaluation as required by the Federal Grant Programs office.

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

Aug 11, 2025