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| Department of Elementary and Secondary Education Logo | | |
|  | Training for New Title I Directors | |
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| Topical Guide  October 2023 | |
| Federal Grant Programs/Resource Allocation Strategy & Planning  Massachusetts Department of Elementary and Secondary Education  Phone 781-338-6230  <http://www.doe.mass.edu/federalgrants/> | |
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### Title I, Part A Programs

# Targeted Assistance Programs

TA programs specifically serve students who are failing or most at risk of failing to meet state academic standards

Selection criteria must be: Multiple, Educationally-related, Objective, and Universally Applied

Eligibility = equal opportunity for all students

Required Documentation:

Student Selection Procedure = written statement of selection process

Selection Criteria Sheets = assign point values to academic criteria

Rank-Ordered Lists = rank students based on academic need

# Schoolwide Programs

Title I services are supplemental to what the school and district would provide and help carry out the school improvement plan to raise academic achievement of all students, especially those who are most academically at risk.

40% poverty or higher to be a SW school. Waiver option if under 40%.

Allows for more flexibility

Required Documentation: Schoolwide Plan

# Program Evaluation

The Program Evaluation Procedure describes how each school’s Title program 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.

Key questions:

* Has the Title I program been effective?
* What has worked well and what has not worked well in the Title I program?
* How should the Title I program be refined?

# Resources

This link will take you to more information on the following topics: <http://www.doe.mass.edu/federalgrants/titlei-a/guidance/>

* Title I Targeted Assistance Programs
* Title I Schoolwide Programs
* Program Evaluation

### Title I Monitoring

Every six years, each school district in the Commonwealth is scheduled for a Tiered Focused Monitoring Review of all State and Federal programs. Districts receiving Title I funds undergo Title I monitoring (as well as Titles II and IV) in the same year they are scheduled for Tiered Focused Monitoring Group A Review.

Timeline:

* Official notification from DESE in the fall
* Documents due in winter (electronic submission into CHAMP)
* DESE report out in spring
* Required actions due the following Fall (if there are findings)

All desk-based – materials are organized by specified numbered submissions and submitted to DESE via CHAMP.

Federal Grants Monitoring Procedures and sample documents can be found here: <http://www.doe.mass.edu/federalgrants/resources/monitoring/>

### Title I Data Collection

# Submitted via GEM$

###### The Title I Data Collection is submitted annually through an Application Supplement in [GEM$](https://mass.egrantsmanagement.com/). District staff with the GEM$ role of LEA Grantwriter for the ESSA Consolidated Grant will have access to this tool in GEM$. Data regarding the use of Title I funds are collected at the District and School levels. This data is collected in June of each year.

### Required Family/Guardian Communications under ESSA

The table below is intended to provide highlights of ESSA’s family engagement requirements. The complete requirements, including more details on the activities above, are described in in DESE’s “Guidance on District and School Family Engagement and Required Policies” under the “Family Engagement” section: <http://www.doe.mass.edu/federalgrants/titlei-a/guidance/>.

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| --- | --- | --- | --- | --- | --- |
| **Program** | **Activity or Deliverable** | **When to Complete** | **Carried out By** | **Stakeholders** | **Notes** |
| **Title I (FC 305)** | **Report Card, Cover Letter, and Families Right to Know Teacher Qualifications** | **When available/**  **applicable** | **All districts and schools** | Families/Guardians of **all students** enrolled in the district | Must include accountability information for the student’s school and district; an explanation of what the classification means; an explanation of how families/guardians can become involved in school and district improvement activities; ***and* *information about teacher qualifications and right-to-know requirements regarding teacher qualifications*** |
| **Title I**  **(FC 305)** | **School-Family Compact** | **September**—at the beginning of the school year and no later than October | **All Title I Schools** | **Targeted Assistance Programs:** Only families/guardians of Title I-served students  **Schoolwide Programs:** All families/guardians | The school-family compact is a document, jointly developed by schools and families that describes how the school, families/guardians, and students share responsibility to achieve improved academic achievement. |
| **Title I**  **(FC 305)** | **School Family Engagement Policies** | **Annually**—families/guardians must have input into the development of the policies on an annual basis | **All Title I Schools** | **Targeted Assistance Programs:** Only families/guardians of Title I-served students  **Schoolwide Programs:** All families/guardians | The school-level family engagement policy is a written document that is developed jointly with families/guardians. It must be distributed to families/guardians and made available to the local community. It should include how schools will convene annual Title I meetings with families/guardians of participating students and involve families in the planning, implementation, and review of Title I programs. |
| **Title I**  **(FC 305)** | **District Family Engagement Policies** | **Annually**—families/guardians must have input into the development of the policies on an annual basis | **All Title I districts** | **Targeted Assistance Programs:** Only families/guardians of Title I-served students  **Schoolwide Programs:** All families/guardians | The district-level family engagement policy is a written document that is developed jointly with and distributed to families of Title I-served students. This policy must describe how the district will build schools’ capacity to effectively engage with families/guardians, build families’ capacity to improve their student’s learning, and the district’s process for engaging families/guardians in the development and improvement of the family engagement plan. |
| **Title I**  **(FC 305)** | **Annual Evaluation of District Family Engagement Policies and Activities** | **Annually** | **All Title I Districts** | **Targeted Assistance Programs:** Only families/guardians of Title I-served students  **Schoolwide Programs:** All families/guardians | Evaluation must address the content and effectiveness of the district-level family engagement policy, including what families need to assist with student’s learning, and strategies to address successful school and family/guardian interactions. |
| **Title I**  **(FC 305)** | **Implementation of Evidence-Based Interventions** | **Annually** | **All Title I Districts** | **Targeted Assistance Programs:** Only families/guardians of Title I-served students  **Schoolwide Programs:** All families/guardians | The findings of the evaluation must be used to design evidence-based strategies for more effective parental involvement, and to revise, if necessary, the existing parent and family engagement polices.  **Resources:**  *ESSA Evidence-Based Interventions:* <http://www.doe.mass.edu/federalgrants/resources/evidence-based.html>  DESE’s *How Do We Know Initiative: Using, Building, and Sharing Evidence to Improve Student Outcomes*: <http://www.doe.mass.edu/research/howdoweknow/> |
| **Title I (FC 305)** | **Title I Application Stakeholder Consultation** | **Annually** | **All Title I districts** | Teachers, principals, other school leaders, paraprofessionals, specialized instructional support personnel, administrators, other appropriate school personnel, and **families/guardians of Title I-served students** | Meaningfully consult stakeholders in development of Title I application |
| **Title II**  **(FC 140)** | **Title II Application Stakeholder Consultation** | **Annually** | **All Title II District** | Teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, families, parents, community partners, and other organizations or partners with relevant expertise | Meaningfully consult stakeholders in development of Title II application, seeking advice from stakeholders on how best to improve Title II activities to meet the grant’s purposes and consult stakeholders on how to coordinate Title II activities with other related strategies, programs, and activities being conducted in the community |
| **Title III**  **(FC 180)** | **Title III Activities** | **Annually** | **All Title III Districts** | Community partners and **families/guardians** of Title III-supported ELs | Must use funds to implement family and community engagement activities that enhance or support language instruction for ELs |
| **Title IV**  **(FC 309)** | **Title IV Stakeholder Consultation** | **Annually** | **All Title IV Districts** | **Families/Guardians**, teachers, principals, other school leaders, students, community-based organizations, local government representatives, and others with relevant expertise | Meaningfully consult stakeholders in development of Title IV application and continue to engage stakeholders on how to improve Title IV activities to meet the grant’s purposes; coordinate implementation of Title IV activities with other related strategies, programs, and activities being conducted in the community |

# Resources

Go to this link for more information on the following topics, including sample documents: <http://www.doe.mass.edu/federalgrants/resources/monitoring/>

* For report card guidance and editable sample letters
* For an editable sample School-FamilyCompact

For more Family Engagement resources : <https://www.doe.mass.edu/federalgrants/resources/family-engagement.html>

### Fiscal Procedures – Compliance

# Comparability

Comparability refers to a current provision of Title I that requires school districts to provide equitable state and local resources to both Title I schools and non-Title I schools.

Demonstrating comparability of services is an annual requirement for each school receiving Title Part A funds. A school district may only receive Title I funds if it uses state and local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that do not receive Title I funds.

Comparability is one indication that a local school district is using Title I funds to supplement and not supplant other funding sources.

Comparable schools: Services funded by state and local resources are equal in Title I and non-Title I schools.


# Supplement NOT Supplant

Supplanting is using federal funds to substitute or replace existing or previously existing programs and services funded by non-federal sources. The LEA and / or schools must demonstrate that Title I funds supplement those funds that are required to be provided to the schoolwide program and targeted assistance schools.

The supplement not supplant methodology was revised under ESSA (Every Student Succeeds Act). Instead of looking at how districts and schools spend Title I funds, it looks at how districts distribute state and local funds to ensure that it’s done in a “Title I neutral” manner. Districts must have and be prepared to provide the methodology used to fund schools without regard to distribution of supplemental Title I funding.

Staffing:

LEAs must maintain records that demonstrate that each Title I program receives staff services commensurate with Title I staff salaries.

Professional Development:

LEA / School must maintain a description of the professional development provided at the district / school level that is funded with Title I funds.

Family Engagement:

LEA / School must maintain a description of the district / school family engagement activities paid for by Title I funds.

Guidance and Counseling (if applicable):

The district and schools will demonstrate that guidance or counseling services paid for by Title I funds are provided to Title I participants and are supplemental to other available guidance and counseling services.

# Time & Effort

School districts are required to maintain auditable "time and effort" documentation that show how each Title I employee spent his or her compensated time. These reports must reflect actual time and should only be logged after the work is complete. Time and effort reports should be prepared by any Title I staff with salary 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.

* **Semi-annual certifications are required for Title I personnel whose compensation is funded solely from the Title I grant**.
* **Monthly reports are required for Title I personnel whose time is charged in part to Title I and in part to other revenue sources (split-funded staff).**
* **Stipends (and other supplemental contracts) must also be reported.**

A substitute time and effort system for split-funded staff is now available to districts. Under the substitute system, semi-annual certifications can be used for staff that are funded through multiple sources or on multiple activities but maintain a consistent work schedule. Districts choosing to use this system must complete and keep on file an Annual Management Certification form. More information and samples can be found on our website.

**What to watch out for:** (1) failing to recognize that a change in position, duties or funding may result in a change in time and effort reporting; (2) failing to provide training to staff who are responsible for completing and/or approving time and effort documentation; (3) reporting time according to how the ratios were budgeted without regard to how the individual actually worked; (4) time and effort reports not reviewed and signed by appropriate staff.

**Time and effort problems can result in:** Inappropriate charges to federal programs, inaccurate management information for decision-making, and/or increased risk of audit findings and questioned costs.

For more information and sample templates, visit this link and scroll to Time and Effort: <http://www.doe.mass.edu/federalgrants/titlei-a/guidance/>

### Fiscal Procedures – Grant Management

# Grant Approval Process & Payments in GEM$

1. Grant information is entered into GEM$ – complete the full application and upload any required documents.
2. If necessary, revisions / additional information may be requested by the DESE reviewer.
3. Notification of grant approval will be sent via an automatic email notification from GEM$ once the application has been approved.
4. The start date will be listed on Grant Award Notice (GAN). The GAN will be generated and available for download once the grant is at DESE Fiscal Budget Approved.
5. Districts are responsible for logging into GEM$ to request reimbursements for expenditures.

# Payments in EdGrants

Districts are responsible for logging into EdGrants during the payment window to request funds on a monthly basis.

# Amendments/Revisions & Multi-Year Process – Title I, II, III and IV grants have a 2-year lifespan

**FY23 (last year) (In EdGrants)**

* FY23 Year 1 9/1/22 to 6/30/23
* FY23 Year 2 7/1/23 to 6/30/24

**FY24 (this year) (In GEM$)**

* FY24 Year 19/1/23 to 6/30/24
* FY24 Year 2 7/1/24 to 6/30/25

**Amendments/Revisions are required when:**

1. there is any significant change in program objectives; or
2. there is any increase or decrease in the total amount of the grant; or
3. an increase in a line of the budget exceeds $100 or 10% of the line (whichever is greater) or exceeds $10,000.

**Amendments/Revisions are not required when:**

1. there is no significant change in program objectives;
2. there is no increase or decrease in the total amount of the grant; and
3. an increase in a line of the budget is less than or equal to $100 or 10% of the line (whichever is greater) and does not exceed $10,000.

# Final Financial Report (FR1) – EdGrants

1. The **FR1** is set-up by the Grants Management office in EdGrants and is typically completed by the School Business Manager. This document is a reconciliation of Title I spending by line item. Grants Management will provide detailed information referencing timelines and process.
2. FR1’s are submitted after the grant has been fully spent.

# Final Expenditures Report (FER) – GEM$

* 1. The **FER** is initiated GEM$ and is typically completed by the School Business Manager. This document is a reconciliation of Title I spending by line item. Grants Management will provide detailed information referencing timelines and process.
  2. FER’s are submitted after the grant has been fully spent.

### Private Schools and Equitable Participation

# Eligibility

* Students eligible to participate are those who would have attended a Title I served school had they attended their home public school.
* Funds must be generated by at least one of the eligible students in the private school for there to be Title I help provided (determined by number of students having low-income status).

# Outreach

* Heads of schools where eligible students attend must be offered opportunity to discuss participation in district’s Title I program (notices sent in spring).
* Acceptance of offer to participate leads to “consultation” between district and private school to design services appropriate for eligible population and equitable to what public school participants are offered Title I Services for non-public school students.
* Services are part of the public school district’s program, funds are controlled by the public school district, and ultimate responsibility for the services and adherence to grant regulations rests with the public school district.
* Programs for non-public school students are always Targeted Assistance (only eligible students are served).
* Services are supplemental to non-public school’s regular instruction and progress must be monitored (part of public school’s program evaluation).

# Ombudsman

* Origin and role – ESSA
  + Provide primary point of contact at state level to address questions and concerns from private school officials and districts regarding provision of equitable services under Titles I, IIA, III, and IVA
  + Monitor and enforce equitable services requirements
* Contact and resources
  + Alex Lilley  
    Equitable Services Ombudsman  
    [ESEAequitableservices@doe.mass.edu](mailto:ESEAequitableservices@doe.mass.edu)
  + Resources related to private school services under ESSA, in general: <http://www.doe.mass.edu/federalgrants/resources/equitableservices-essa/>

# Resources

For resources related to Title I private school student participation, visit this link and scroll down to private school services: <http://www.doe.mass.edu/federalgrants/titlei-a/guidance/>

Networking Resources

# Statewide Directory of Title I Directors

###### The Department of Elementary and Secondary Education regularly communicates with the list of Title I Directors it has on file to keep districts informed about issues such as funding, federal regulations and guidance, Departmental conferences and workshops, required surveys, reporting documents, etc. Each district's Directory Administrator is responsible for keeping the directory up-to-date.

###### Visit <http://www.doe.mass.edu/InfoServices/data/diradmin/> for an explanation of DA and a link to the list of district level directory administrators who are responsible for its maintenance.

# Federal Grant/Title I Director Regional Networking Sessions (note: during the COVID pandemic, remote meetings with your liaison and his/her assigned districts replaced regional face-to-face meetings)

Networking meetings are hosted by Federal Grant Directors in different regions of the state. A department liaison attends the meetings to serve as a resource and to update attendees on grant-related matters. Attendees jointly develop agenda items to best meet their informational and networking needs. Directors will receive meeting invitations and requests for agenda items from the Director who is hosting the meeting or from a DESE liaison.

# Monthly Federal Grants Newsletter

At the beginning of each month, the federal grants newsletter will be sent to the listed federal grant program directors and district business officials in Directory Administration for every district. The newsletter will cover upcoming pertinent Title I, Title IIA, Title III, and Title IVA topics, as well as some other federal grants information.

# Council of Administrators of Compensatory Education (C.A.C.E.)

###### C.A.C.E. is a Massachusetts organization for Title I administrators. It holds a conference for district Title I administrators each fall/early winter as well as monthly membership meetings, providing information gathering and networking opportunities.

Visit <http://www.cacetitle1.org/>

# Comprehensive Center Network (CCNetwork) – Region 1: MA, ME, NH, VT

Funded by a grant from the U.S. Department of Education, the Region 1 Comprehensive Center at the [American Institutes for Research](https://www.air.org/) (AIR) builds the capacity of state education agencies (SEAs), local education agencies, and schools to improve instructional quality, address achievement and equity gaps, and improve outcomes for all students on state-identified priority initiatives. Region 1 staff bring substantial technical assistance and content expertise in designing, developing, and implementing strategies to support educational improvement.

Visit <https://region1cc.org/>