

## Background

Title I and Title IIA are federal education grant programs designed to provide school districts with additional financial resources aimed at improving student achievement. Title I does so in supporting the districts' low-income students, and Title IIA does so through professional development for teachers. In 2011, the US Department of Education signaled a departure from long-standing federal education policy in affording states the opportunity to request a waiver of certain provisions of the Elementary and Secondary Education Act (ESEA, also known as No Child Left Behind). Massachusetts sought and was granted an ESEA waiver in 2012.

With the waiver, Massachusetts school districts were provided additional flexibility to:

- Use Title I and Title IIA funds in support of low-achieving students district-wide; and/or
- Transfer up to 100% of Title IIA funds to support Title I-funded programs; and/or
- Operate school-wide Title I programs in schools identified as among the state's lowest performing.

For the first time, in FY2013, Massachusetts school districts could take advantage of these key flexibility provisions when allocating federal resources to serve a greater proportion of their low-achieving students,<sup>1</sup> and support more comprehensive district- and school-level improvement strategies to bolster student learning. Understanding these district-led policy choices about allocation of federal resources may prove to be instructive in more effectively addressing the needs of the lowest achieving students in low-performing districts and schools.

## Study design

In the interest of describing district use of flexibility provisions and innovative approaches in Title I/IIA-supported programs, ESE contracted the Rennie Center for Education Research & Policy to investigate current practices in Title I and Title IIA spending, highlight innovative approaches, and document the use of evidence-based strategies to support student learning. The Rennie Center analyzed district fiscal data and Title I/IIA applications, and conducted site visits to four districts selected for their approach to utilizing flexibility provisions in order to document the ways in which districts have responded to the introduction of flexibility provisions.

*Research questions.* The Rennie Center team pursued research questions critical to improving understanding of how new flexibility provisions may influence resource use to support comprehensive or high-leverage district- and school-improvement strategies. This study considers:

1. How are Massachusetts school districts currently using Title I and Title IIA funds, and how does current practice compare to the period preceding Massachusetts' ESEA waiver?
2. What evidence exists demonstrating the use of Title I and Title IIA funds in districts and schools in non-traditional and innovative ways?
3. How have some districts managed to introduce innovative change in the use of Title I and Title IIA funds to promote strategies with evidence of improving student achievement?

The study seeks to determine whether the kinds of changes being made in Title I/IIA programs align with the new flexibility provisions, that is: will a more nuanced definition of student need – characterized by a focus on performance – and a more strategic approach to allocating federal funds by districts better address the needs of low-achieving students?

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<sup>1</sup> Massachusetts Department of Elementary and Secondary Education. (2012). *ESEA Flexibility: Changes to School and District Accountability and Assistance*. Retrieved from: <http://www.doe.mass.edu/apa/titlei/esea/ESEA-flexibility-overview.pdf>.

## Findings

The Rennie Center for Education Research & Policy found that, of the districts included in the study's analytic sample,<sup>b</sup> more than 70 percent utilized one or more flexibility provisions to alter their distribution of Title I programming. "Flex" districts are those that used required reservations to provide additional resources to lower-performing Title I schools, support teachers who work with the district's lowest-achieving students, or serve low-achieving students outside of the school day; "roll-up" districts are those that transferred some or all of their Title IIA funding into their Title I funds.

### Strategic choices about flexibility

The manner in which districts elect to qualify a school for Title I services and decisions about how to use Title I/IIA funds are pivotal issues for districts. Data on districts' eligibility policies, choices about required reservation funds, and FY2013 Title I/IIA fiscal patterns reveal emerging changes in districts' policies from the prior year when flexibility provisions were not available.

- Districts allocated a slightly larger proportion of Title I funds to personnel and a smaller proportion to contracts in FY2013, likely due to the elimination of Supplemental Education Services as a district requirement.
- While only a small proportion of districts rolled up any Title IIA funds into Title I, those that did transferred a substantial percentage of their Title IIA award.
- Among flex districts, there were no clear trends in the approach districts selected for identifying schools for Title I programming or in the type of programming used; districts used funds for resources for Title I schools, support for teachers, services for low-achieving students outside the school day, or a combination of these.

### New approaches to Title I and IIA programming

An analysis of FY2013 application data revealed the majority of districts used Title I resources in elementary level classrooms and targeted students for additional services in reading. A majority of districts also used Title I funds for instructional positions in the form of teachers, specialists, and tutors. The study team chose to highlight and present trends less prevalent in district applications, and that were made by districts where programmatic change accompanied the use of one or more flexibility provision.

- Districts used Title I funds to extend instructional time through longer school days and years, as well as expanded grade spans served.
- Districts expanded Title I programming school- and district-wide with the goal of serving students with the highest academic need.
- Teachers used performance data to chart instructional changes geared to support student achievement.

### Decisions about flexibility provisions: How four districts sought out comprehensive strategies

Site visits highlighted ways in which four districts used flexibility provisions to bolster student learning. Findings below describe how these districts prioritized programs and arrived at these decisions after the introduction of new flexibility provisions. These findings may be helpful to other districts as they encounter challenges and choices in the use of Title I and/or IIA funds.

- Districts used federal resources in ways that aligned with an existing district strategic plan.
- District leaders relied heavily on the analysis of student performance data to inform decisions on Title I/IIA programming to support low-performing students.
- District administrators, central office leadership, school leaders, and instructional teams from individual schools collaborated to make decisions about the use of federal resources.
- Districts used flexibility provisions to reconsider and adjust staff positions funded by their Title I award, deploying staff in new and different ways to support Title I programs.
- A continuing conversation with state education officials informed districts about flexibility provisions and the completion of their FY2013 Title I application.

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<sup>b</sup> 247 districts were included in all types of analyses utilized for the study - charter and vocational-technical schools were not included in the study, nor were districts that did not receive Title I funding during all of the past three fiscal years (FY13, FY12, and FY11).

## Policy considerations

### For K-12 district leaders

- **Expand the use of performance data in planning for Title I services as way to serve more students, and students of highest need.** District administrators reported flexibility provisions were an *essential* policy change to support student achievement in their district, and used student performance as a key indicator for federal resource allocation.
- **Evaluate programs in light of results and resources as a key component of district investment strategy.** An increased focus on data-informed interventions allows districts to support more students and may represent the best investment strategy to drive higher levels of student learning and achievement without an increase in resources or funds.
- **Incorporate Title I programs and other federal resources into broader district-wide strategies for improving student achievement.** Districts implementing new approaches to Title I programs did so by expanding programs that were found to be successful in meeting student needs. Where districts introduced new programs, they did so based on school improvement and student achievement goals established by their strategic plan.

### For state policymakers

- **Create opportunities for districts to share information about how they use Title I/IIA funds to target sub-groups of students.** There is an opportunity for ESE, state associations and other stakeholders to facilitate conversations among districts to share knowledge about how to take full advantage of flexibility provisions to target critical areas of low performance and utilize federal resources most efficiently.
- **Provide districts with more information on the benefits of flexibility provisions.** State education leaders, particularly those familiar with and in contact with districts across the state, can continue to provide districts with information on the benefits of flexibility provisions, perhaps offering more tailored assistance based on common district needs.
- **Encourage districts to better evaluate the effectiveness of their Title I programs.** ESE can foster a dialogue within districts on the effectiveness of Title I programming; one simple way to do so may be in amending the Title I/IIA combined application by asking districts to explain their reasons for choosing each element of Title I programming.

## Conclusion

The information presented in this policy brief summarizes the extent to which districts are using flexibility provisions, introduced by Massachusetts' ESEA waiver, and the subsequent program changes in district Title I and IIA programs. Flexibility provisions have resulted in an evolution of districts' decision-making about federal resources to support student learning, as performance data and evaluative criteria are being used more frequently by district administrators to make choices about how to use Title I and IIA funds. Some districts are quickly becoming adept at incorporating federal resources into district strategy and serving more students as they do so. Districts can maximize flexibility and federal resource use to bolster student learning; as one district administrator noted: "flexibility provisions have opened a lot of doors."

## Background

Increased flexibility in the use of federal funds, granted through Massachusetts' Elementary and Secondary Education Act (ESEA) waiver, presented districts with discretionary control over federal resources to pursue the goals of the Commonwealth's education reform agenda, first outlined in *An Act Relative to the Achievement Gap of 2010* and comprehensively articulated in the Massachusetts Department of Elementary and Secondary Education's Conditions of School Effectiveness. These flexibility provisions incentivize districts to implement high leverage strategies that:

- target the lowest achieving students in low-performing schools;
- aggressively address school performance and student achievement;
- are close to the instructional core; and
- are monitored for efficacy and impact.<sup>1</sup>

Perhaps, most importantly, this flexibility includes a shift in focus for districts' Title I and IIA programs, highlighting student need based on achievement and not solely low-income status, and developing interventions focused more exclusively on low-performing schools.

Flexibility provisions can provide district administrators the opportunity to support more comprehensive district- and school-level improvement strategies to bolster student achievement. Guidance for district administrators on how to maximize flexibility provisions for school improvement remains a continuing need; models highlighting how districts are working within new funding and reporting provisions to enhance student learning and achievement are an important component of this guidance.

### Policy Context

Approved in time for the FY2013 Title I and IIA application process, flexibility provisions from the Massachusetts ESEA waiver provided districts the ability to:

- Use Title and Title IIA funds in support of low-achieving students district-wide; and/or
- Transfer up to 100% of Title IIA funds to support Title I funded programs; and/or
- Operate school-wide Title I programs in schools identified as among the state's lowest performing.

In 2011, the U.S. Department of Education signaled a departure from long-standing federal education policy in affording states the opportunity to waive No Child Left Behind accountability provisions. This translated into more flexibility for states and districts to allocate federal resources, such as Title I and Title IIA, as long as states chose among federally-determined priorities such as college and career readiness, and standards and assessments. The introduction of these flexibility provisions represents an important policy change for Massachusetts' districts and schools, and another critical juncture for Title I and IIA policy nationally. Title I and IIA are federal education policies designed to provide school districts with additional financial resources aimed at improving student achievement. Title I does so through additional supports for districts' most struggling students, and Title IIA does so through professional development for teachers.

Since the inception of these policies, there has been an evolution in regulation, with an impact on decision-making at the local level. Given that Title I policy was borne out of Great Society legislation in the mid-1960s, a common understanding of the policy has always been its link to providing *additional* services to low-income students. Federal regulation of Title I introduced the "supplement, not supplant" requirement—necessitating that school districts demonstrate that federal Title I resources were being used to provide some form of additional education services to eligible students.<sup>2</sup> For school districts across the country, this guidance translated into implementing a set of educational interventions that demonstrated districts' intent to provide additional services to Title I-eligible students.<sup>3</sup> Once a commonly-held notion of how to allocate federal funds, especially Title I funds, districts often opted for instructional positions (e.g., a reading specialist or another interventionist position), and professional development exclusively in service of Title I-eligible students. While meeting federal requirements, this approach often compartmentalized a districts' approach to serving academically at-risk students based on Title I eligibility status.<sup>4</sup> Through the passage of the Improving America's Schools Act (1994), significant changes were introduced to Title I funding regulation. Perhaps foreshadowing regulatory changes that would again be taken up in the most recent policies of 2011, districts and schools were granted more discretion to use federal funding for multiple

programs at a school-wide level.<sup>5</sup> Federal changes also decreased the income designation for school eligibility, and states could also waive federal requirements that conflicted with school improvement goals.

In securing the ESEA federal waiver, Massachusetts Department of Elementary and Secondary Education (ESE) afforded districts discretion in allocating, federal Title I and IIA resources targeted towards the lowest-achieving students in low-performing schools in each district, aligned with the Conditions for School Effectiveness. These most recent changes to federal education policy allowed for more state and local control over federal resources dedicated to school improvement. With flexibility provisions available in future Title I/IIA application cycles, specific knowledge is needed to understand how districts have taken up these flexibility provisions and the potential impact on districts' plans for improving low-performing schools.

## **Study design**

In the interest of documenting district use of flexibility provisions and the introduction of innovative approaches in Title I-/IIA-supported programs, ESE contracted with the Rennie Center for Education Research & Policy (referred to as the study team throughout the course of the report) to track changes in Title I and Title IIA spending, highlighting changes in the programs districts have allocated federal resources to fund, and documenting the ways in which new approaches were introduced to support student learning.

*Research questions.* To do so, the study team pursued research questions critical to improving understanding of how flexibility provisions may influence resource use in district- and school-improvement strategies. This study considers:

1. How are Massachusetts school districts currently using Title I and Title IIA funds, and how does current practice compare to the period preceding Massachusetts' ESEA waiver?
2. What evidence exists demonstrating the use of Title I and Title IIA funds in districts and schools in non-traditional and innovative ways?
3. How have some districts managed to introduce innovative change in the use of Title I and Title IIA funds to promote strategies with evidence of improving student achievement?

It is the goal of the study to determine whether the kinds of changes in Title I/IIA programming made by districts align with new flexibility provisions, that is: will a more nuanced definition of school and student need—characterized by a focus on performance—accompanied by a more strategic approach by districts to allocating funds better address the needs of low-achieving students?

To note, the research questions developed to guide this study do not specifically address the extent to which Massachusetts school districts used flexibility provisions during the FY2013 application cycle – the first cycle when flexibility was made available to districts. Rather, the research questions take up issues of *how* school districts are using Title I and IIA funds compared to the period before the waiver. The study design also then assesses whether the ways in which districts are using federal resources are non-traditional, e.g., do these new approaches to allocating federal resources diverge from the ways in which Title I/IIA funding has traditionally been used? The study design described below is based on the assumption that *at least some* Massachusetts districts would use one or more flexibility provisions during the FY2013 (see text box below for a description of flexibility provisions). If so, the study team would then be able to describe any differences in the programming these districts' support post-waiver, and the ways in which these districts made decisions about federal resources. From the study team's preliminary analysis, this assumption about utilization of flexibility provisions held true; more than 70 percent of districts included in the analytic sample submitted FY2013 applications detailing the use of one or more flexibility provisions.

## Title I flexibility provisions available to districts through Massachusetts' ESEA flexibility waiver

### 1 - Designating additional supports for low-performing schools through the use of reservation funds

Massachusetts' ESEA flexibility waiver makes it possible for districts to use Title I funds more strategically to meet identified needs, as assessed in relation to the Conditions of School Effectiveness, and provide support for low-achieving students school- and district-wide. Districts in accountability levels 2 to 5 are required to reserve some portion of their Title I funds (i.e., required reservation funds) to support district/school/student needs using one or more of the following options:

- *Additional Title I resources to Title I-served schools (Option A).* Districts can opt to provide additional resources to lower-performing Title I schools (compared to other Title I schools in the district) than would have been allowed through existing qualifying methods, or a funding per pupil calculation.
- *Support to the teachers who work with the district's lowest-achieving students (Option B).* Districts may use Title I funds to support any teacher in the district who works with the lowest-achieving students.
- *Direct services to low-achieving students district-wide outside of the school day (Option C).* School districts may provide direct services to the lowest-achieving students in any school before or after school or during weekends or vacations.
- *A portion of school formula allocation(s) to interventions and support (Option D).* Districts can opt to allocate all or part of the regular school allocation to interventions in the lowest-performing schools. This option was not frequently used; when it was, it was done so by small (Title I) award districts to allocate most or all funds to one school in the district. As such, the study team did not include districts that only used option D among the set of flex districts.
- *Additional supports to all students in a low-performing school (Option E).* Districts have flexibility to designate Level 3, 4, or 5 schools as Title I school-wide programs (e.g., that would have qualified as Targeted Assistance programs) to be able to use Title I with other resources to upgrade the school's entire educational program. This option was used very infrequently across Massachusetts districts.

### 2 - Roll up of Title IIA funds into Title I

All districts have the option to transfer ("roll up" for the purposes of this report) some or all of their Title IIA funds into Title I.

The study design described below was also based on the assumption that districts who used flexibility provisions, ("flex" districts) were more likely than districts who did not use flexibility provisions ("non-flex" districts) to make changes in their Title I or IIA programs. These changes included the introduction of new and/or non-traditional approaches (i.e., school- and district-wide strategies that address school improvement based on performance designations). As such, the study team limited their analysis of Title I application data to the group of districts that used flexibility provisions. When considering the changes made by districts reported below, it is important to note that the ways in which districts use Title I and IIA funds is likely to be largely the same as had been the case prior to the introduction of flexibility provisions. Most districts were given discretion over their required reservation funds, which are between 5 and 25 percent of their total Title I allocation, and the option to transfer some portion of their Title IIA funds into Title I. Therefore, the balance of districts' federal resources remain committed to supporting low-performing schools, and districts may be largely doing so in many of the same ways as they had prior to the advent of flexibility provisions. Even if districts introduced new approaches under these flexibility provisions, this still represents only a portion of the total federal resources dedicated to instructional supports for low-performing schools and students. Yet, understanding the choices that districts have made when given discretion over federal resources remains an important policy issue; for example, will more comprehensive approaches to bolster student learning emerge?

Based on these assumptions, the study team developed a methodology that included analysis of extant data, including Title I and IIA fiscal data and Title I/IIA application data in an attempt to document relevant findings on programmatic changes. Data sources, sample selection, and analyses are described in detail below.

**Data sources and analysis.** The study team conducted three analyses to compare districts' Title I and Title IIA programs pre- and post-waiver. Figure 1, below, describes the data sources used to answer each of the study's research questions.

- *Fiscal analysis.* The study team analyzed Title I and IIA fiscal data to document changes in how districts budgeted federal resources pre- and post-waiver. Analyses used fiscal data from FY2011 and FY2012 (pre-waiver) and FY2013 (post-waiver) to highlight relevant changes.
- *Application data.* This analysis sought to identify and describe districts' use of ESEA flexibility provisions, and to test whether districts used new and/or non-traditional approaches in Title I programs post-waiver when flexibility provisions were available. Using FY2013 Title I/IIA combined applications submitted to ESE, the study

team coded the narrative descriptions of Title I programs in districts that used at least one flexibility provision. Quantitative analysis of these codes focused on identifying those approaches that were less common – and therefore perhaps presented non-traditional approaches - and trends among program characteristics.

- *Site visits.* Using a multi-step approach (see Appendix A, Figure A1), the study team selected four districts for participation in case studies. Based on a review of FY2013 Title I/IIA combined application data, these districts presented strong examples of using new, non-traditional approaches in planning Title I programs. The study team conducted site visits to each district, including interviews with the Title I director and other key program staff. Interviews focused on the decision-making process about the use of flexibility provisions in the FY2013 Title I/IIA combined application cycle, and how this may have led to the introduction of non-traditional approaches. Qualitative analysis of interview data included a focus on each district’s decision-making process, key staff involved, alignment with strategic plans, and the influence of ESE’s Conditions of School Effectiveness.

Figure 1. Research questions and study data sources

Research questions	Data sources		
	Fiscal data	Application data	Site visit data
1. Use of Title I and IIA funds	X	X	
2. Non-traditional and innovative use of Title I and IIA		X	X
3. Change management process to support improved student achievement			X

*Sample.* The study team built an analytic sample to answer the study’s research questions about districts’ use of flexibility provisions and the introduction of new and/or non-traditional approaches. To ensure comparability, districts must have received Title I funding in FY2011, FY2012, and FY2013 to be included in the sample.<sup>c</sup> The study team chose to exclude charter school and other single-school districts such as regional vocational/technical schools, as these districts would not have to make the same kinds of strategic decisions about federal resources as multi-school districts. This resulted in a total sample of 247 districts. Within this set, districts were considered “flex” or “non-flex” based on whether they used at least one flexibility provisions (see additional detail in Figure 2 below).

Analysis of districts receiving Title IIA funds included all districts that received Title IIA funding in FY2013 except single school districts. Districts were considered “roll-up” or “non roll-up” based on whether they transferred some portion of the district’s Title IIA allocation in support of Title I programs (see Figure 2 below).

Figure 2. District groups used for comparison in analysis

	District group	Definition	Districts included	Analysis
Title I	Flex districts <sup>d</sup>	Includes districts (except charters and vocational/technical schools) that exercised one or more flexibility provisions in FY2013: <ul style="list-style-type: none"> <li>▪ allocated funds into Option A, B, or C; and/or</li> <li>▪ “rolled up” some Title IIA funds into Title I.</li> </ul>	174 districts	<ul style="list-style-type: none"> <li>▪ Fiscal analysis: Title I funds</li> <li>▪ Application analysis</li> <li>▪ Site visits: 4 districts selected</li> </ul>
	Non-flex districts	Includes all other districts (except charters and vocational/technical schools) that submitted Title I applications, but did not utilize Option A, B, or C, and did not roll up any Title IIA funds into Title I.	73 districts	<ul style="list-style-type: none"> <li>▪ Fiscal analysis: Title I funds</li> </ul>
Title IIA	Roll-up districts <sup>e</sup>	Includes only those districts that opted to roll up some or all of their Title IIA funds into Title I.	29 districts	<ul style="list-style-type: none"> <li>▪ Fiscal analysis: Title IIA funds</li> </ul>
	Non roll-up districts	Includes all other districts (except charters and vocational/technical schools) that submitted Title IIA applications in FY2013 and did not opt to roll any funds into Title I.	232 districts	

<sup>c</sup> In addition, we chose to remove a number of districts from the analytic sample who did not write their own FY2013 Title I/IIA applications (i.e., “tag-along” districts) as they did opt into flexibility provisions, or plan for particular allocations in that they receive Title I funds from applications written by the lead district (i.e., Schedule A writer district); note, we did include Schedule A lead districts in the sample.

<sup>d</sup> There is a larger range in Title I funds awarded to flex districts than non-flex districts, and the average award amount is larger for flex districts than non-flex districts (see Appendix A, Figure A2). Most large-award districts across the state are within the flex group.

<sup>e</sup> The average amount of Title IIA funds awarded to roll-up districts was higher than non roll-up districts (see Appendix A, Figure A3).

**Study limitations.** A number of important caveats exist to the findings presented in this report. First, as noted above, FY2013 was the initial application cycle in which districts could utilize flexibility provisions to make changes to the ways in which Title I and IIA funds are allocated. Therefore, there could be only limited expectations for implementation of both flexibility provisions and changes to district Title I/IIA programs.

Furthermore, the primary data source for this study are the FY2013 combined Title I/IIA applications. The districts' goals in completing these applications is to describe the programs they are implementing—or planning to implement—that align with the strategic goals of the Title I and IIA federal programs. If districts used flexibility provisions and made programmatic changes between FY2012 and FY2013 but did not describe them as such in their FY2013 application, these changes would not have been captured. These application narratives articulate the goals of districts' Title I/IIA “programs” and are self-reported data.

Finally, the unit of analysis for this study is a district's Title I or IIA program. The study team made this decision based on the kinds of information most typically found in districts' combined FY2013 Title I/IIA applications; districts were asked to describe priorities and strategies designed to drive improvements in school improvement and student achievement supported by federal resources. Generally, districts did not provide details on specific interventions. For example, if a district described a new extended day program, they did not always report on the grade level served or content area addressed. Many districts included this level of specificity in their application, but this was not required for each intervention the district would fund with Title I dollars. Therefore, the study team could not consistently compare programs at the intervention level.

## Findings

More than 70 percent of Massachusetts districts, identified for the purposes of this study, utilized one or more flexibility provisions during the FY2013 application cycle. Presented below, and organized topically, are findings from all three analyses designed to characterize the changes districts made in light of use of these flexibility provisions:

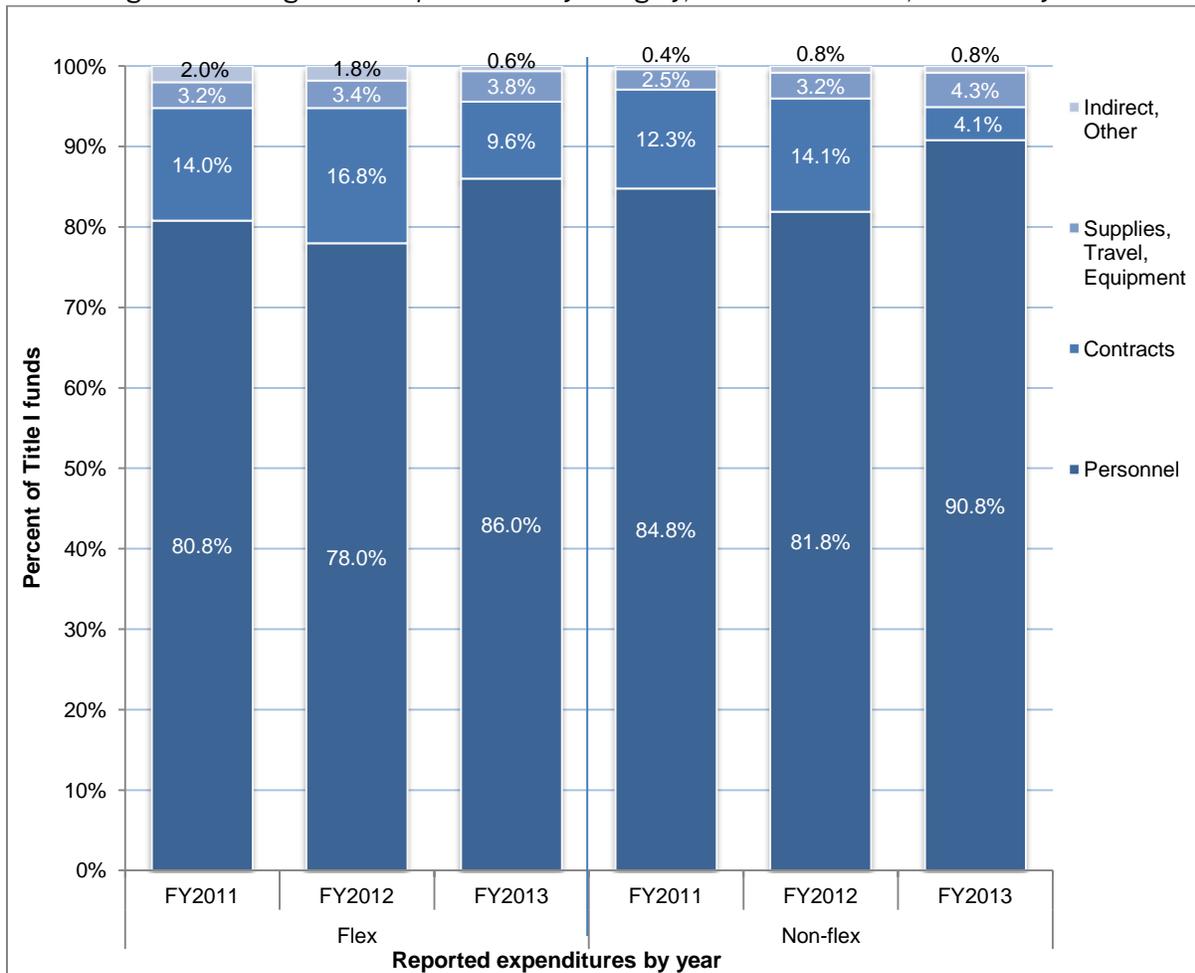
- fiscal analysis, which identifies any changes in how districts allocated Title I and IIA funds pre- and post-waiver;
- application analysis, documenting the extent to which districts made changes in programming supported by Title I;
- site visits providing in-depth examples of how districts are making decisions about Title I/IIA resources.

## Strategic choices about flexibility

Decisions about how to use Title I and IIA funds in light of flexibility provisions and the manner in which districts elect to qualify a school for Title I services are pivotal issues for districts. Data on Title I/IIA fiscal patterns, districts' eligibility policies, and choices about flexibility options, reveal slight changes in districts' policies from FY2012.

***In FY2013, all districts, on average, increased Title I personnel expenditures and decreased expenditures on contracts.*** An analysis of fiscal data revealed how districts budgeted Title I funds in FY2013 (post-waiver) compared with FY2011 and FY2012 (pre-waiver). In FY2013, the percentage of total Title I expenditures committed to contract expenses decreased (from 16.8% in FY2012 to 9.6% in FY2013 among flex districts; and from 14.1% of FY2012 to 4.1% in FY2013 among non-flex districts). The percentage of personnel expenditures increased, and the percentage of expenditures committed to supplies increased slightly. In contrast, from FY2011 to FY2012 the average proportion of expenditures committed to personnel declined and increased for contracts (see Figure 3 below). This trend is likely linked to the change in Title I policy for FY2013 which alters the requirements for some districts to allocate a portion of their Title I funds in support of supplemental education services, typically provided to schools through the services of a contractor or vendor. In this analysis, the difference in personnel and contract expenditures between flex and non-flex districts is not substantial.

Figure 3. Average Title I expenditures by category, district flex status, and fiscal year\*



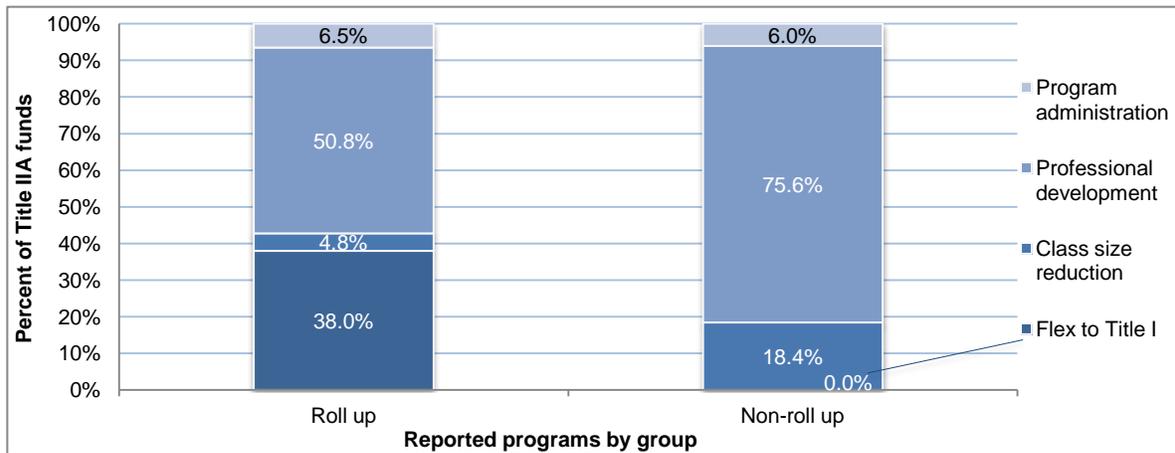
\*Note: The personnel line item is a combination of administrators, instructional staff, support staff, and fringe categories; the fringe line item, not listed here, is a combination of multiple fringe expenditure categories for some years (so that the information is comparable across years);. The sample of districts included in this analysis used the following counts: flex districts  $n=174$ ; non-flex districts  $n=73$ . Source: Budget summaries for each fiscal year.

Figure reads: “In non-flex districts, the average percent of all FY2013 Title I funds budgeted to personnel expenditures is 90.8%.”

*While only a small proportion of districts rolled up any Title IIA funds into Title I, those that did transferred a substantial percentage of their Title IIA award.* The fiscal analysis also characterized the differences between districts that utilized flexibility by rolling up some or all Title IIA funds into Title I (roll-up districts) and districts that opted not to roll up any Title IIA funds (non roll-up districts). The 29 roll-up districts varied considerably in the amount of FY2013 Title IIA funds transferred into Title I (see Appendix B, Figure B1). The average amount these districts rolled up was sizeable, almost 40% of the Title IIA funds.

While both roll-up and non roll-up districts spent the majority of their FY2013 Title IIA expenditures on professional development, non roll-up districts allocated a greater percentage of their funds to this budget category. Notably, non roll-up districts also allocated a larger percentage of funds to class size reduction than roll-up districts (see Figure 4 on the next page).

Figure 4. Average percent of FY2013 Title IIA expenditures, categorized by district roll-up status.\*



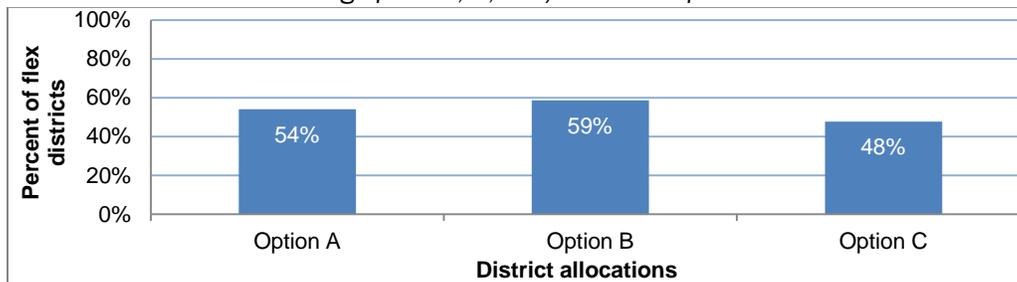
\*Note: The sample of districts included in this analysis used the following counts: roll-up districts  $n=29$ ; non roll-up districts  $n=232$ . Source: Budget summary for fiscal year 2013.

Figure reads: “In roll-up districts, the mean proportion of all FY2013 Title IIA funds budgeted to Professional Development was 50.8%.”

*Among flex districts, there were no clear trends in the approach districts selected for identifying schools for Title I programming or in the type of programming used.* An examination of FY2013 Title I applications from districts utilizing at least one flexibility provision revealed eligibility criteria for qualifying schools remained largely the same in FY2013 as in FY2012 (see Appendix B, Figure B2 for description of criteria). However, eligibility criteria that required administrators to look district-wide, such as the 35% rule, and the district-wide low-income percentage, saw a slight increase in use (see Appendix B, Figure B3). Using these qualifying methods, any school at or above the district-wide poverty average, or above 35 percent poverty, can be designated for Title I funds. As districts use eligibility criteria that focus on a particular set of schools (e.g., based on a grade level grouping) slightly less frequently, this would suggest that some districts are pursuing a more holistic assessment of which schools could be served with Title I funds.

Districts in Levels 2 to 5 have the opportunity to use any combination of flexibility provision options for required reservation funds to support their lowest-achieving students. These options represent the way in which districts can allocate additional resources to better meet the needs of low-performing schools and students (see text box on page 3 for description of flexibility provisions). A substantial percentage of flex districts used required reservation funds for options A, B and/or C. Districts choose Option B supporting teachers who work with the lowest-achieving students, more frequently than option A, which provides for additional support to lower-performing Title I schools. Option C, which allows districts to provide direct services to low-achieving students district-wide and outside of the school day, was chosen less frequently (see Figure 5 below for details).

Figure 5. Percent of flex districts choosing option A, B, and/or C for required reservation allocations in FY2013.\*



\* Note: The sample of districts included in this analysis used the following counts: Flex districts  $n=174$ . Choosing of options A, B and C is not mutually exclusive. To note, the study team made the decision to analyze districts’ use of options A, B, and C, but not options D or E. This distinction was made based on small number and proportion of districts selecting options D and E.

Figure reads: “Of Flex districts, 48% allocated at least some required reservation funds into Option C, which provides for direct services to low-achieving students district-wide, outside of the school day”.

### New approaches to Title I and IIA programming

In undertaking an analysis of FY2013 application data, the study team found that the majority of districts use federal Title I resources in elementary-level classrooms and targeted students for additional services in English language arts (ELA)/reading (see Appendix C, Figures C1 and C2). Further, a majority of districts also used federal

Title I resources to fund programs for targeted groups of students (see Appendix C, Figure C3). These findings reinforce the notion that most districts continue to use federal Title I resources in previously established ways—structuring programs to provide additional services to a targeted set of students supporting reading instruction in elementary schools.

This study was trying to capture the extent to which districts that used flexibility provisions also adopted new and/or non-traditional approaches in their use of Title I funds. One hundred fifty-one districts—a sub-set of the 174 flex districts—made some form of programmatic change when applying for Title I funds in FY2013. Even in light of these programmatic changes, most districts used Title I funds to support elementary-level instructional positions. The study team chose to highlight and present trends less prevalent in district applications in the discussion below.

*Districts used Title I funds to extend instructional time through longer school days and years, as well as to expand grade levels served.* Twelve districts implemented extended school day interventions and seven districts implemented extended school year interventions as school- or district-wide strategies. Far more districts implemented these programs with a targeted set of students (see Appendix C, Figure C3). Districts opting for the school- or district-wide strategy often staged implementation, targeting a particular grade-level at first, and expanding to new grade levels. For example, Westfield added extended learning sessions in certain grade levels, oriented primarily towards additional help in preparing students for the MCAS. For those districts that used extended day or extended year as a strategy for a targeted set of students, many did so by offering instruction during school vacation weeks and on Saturdays.

A small number of districts used Title I funds to extend the grade levels offered to a targeted set of students. For example, Stoughton provided free pre-Kindergarten to four-year olds who will be attending West Elementary, the district's only Level 3 school. The district used a set of criteria—mirroring Head Start criteria—to determine student eligibility. Similar to this grade-level expansion in Stoughton, Dedham used Title I funds to offer half-day kindergarten through its Early Childhood Center. In particular, this program targeted students unable to afford the district's full-day kindergarten program, for which parents pay a fee, who feed into a historically low-performing district elementary school. Both districts chose this strategy to ensure that a large proportion of the district's high-needs population had a greater opportunity to be school-ready.

*Districts expanded Title I programming school- and district-wide with the goal of serving highest need students.* When analyzing data from the site visit districts—Southbridge, Westfield, Stoughton and Dedham<sup>f</sup>—the study team learned that districts used federal resources to support programs in which a greater number/percentage of schools and/or students are served than had been the case in prior years. Programs were expanded so that more students participated, and Title I/IIA funds were distributed across a greater number of schools in the district.

The expansion of Title I programs in these districts was purposeful, and was intended to serve low-achieving students in the district. For example, in Westfield and Stoughton, district administrators expanded some of the Title I program offerings district-wide where programs had previously been designated in support of one or two Title I schools. In Dedham, FY2013 Title I funds were used to support programming in the district's two Level 2 schools—which have fewer lower-income students but more low-achieving students—than the long-supported “Title I school” which is higher-performing and has a higher percentage of low-income students. Stoughton and Westfield now offer summer programs where students are recruited district-wide; enrollment was previously limited to students from designated Title I schools. As one district administrator noted, “We knew flex was providing the opportunity to go into more classrooms and impact more students—this was a more inclusive way to fund. We made many of our decisions on MCAS performance data. We looked at test results...We wanted to look to student need.”

*Teachers used performance data to chart instructional changes in order to support student achievement.* Twenty-two districts committed Title I resources to activities in which teachers reviewed and analyzed student performance data. (Please see Appendix C, Figure C3 for data on Title I-funded interventions involving teachers). Districts implementing these strategies most often described regularly occurring school-based data meetings. Many districts used Title I funds to hire a data coach or specialist to lead a collaborative data review with teachers; some districts used funds to contract with established professional development providers to do analysis of performance data and aligned professional development sessions with teachers. Other districts used Title I funds to dedicate time within existing positions to perform data analysis. In still other districts, district-level instructional staff led these

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<sup>f</sup> As described above and in Appendix C, these sites were selected based on criteria to surface potentially new and/or non-traditional approaches to allocating Title I funding. However, the districts selected are characterized by Title I allocations above the district allocation median – potentially influencing the kinds of programmatic approaches that these districts could implement in light of the larger allocation amount that might not be universal to all districts.

efforts. For example, some districts used Title I funds to support math and reading instruction specialists to work with student performance data and develop units of study differentiated for student needs. A few districts also planned new student interventions based on the results of this collaborative data review. Several districts planned for a “double dose” of math and/or reading instruction. Districts, using grade-level benchmark data, ranked students according to their level of instructional need, and either offered a double class period of instruction or an additional 30 to 60 minutes of math or reading instruction during the school day to the lowest-performing students.

**Decisions about flexibility provisions: How four districts sought out comprehensive strategies**

District site visits highlighted new and/or non-traditional ways in which districts are utilizing flexibility provisions to bolster student learning. The site visits—in Dedham, Stoughton, Southbridge, and Westfield—sought to document and understand the ways in which these districts made choices about federal resources to support strategic reforms (see text box below). Findings below describe how these districts prioritized programs and arrived at these decisions after the introduction of new flexibility provisions. These findings may be helpful to other districts as they encounter choices and challenges in the use of Title I and/or IIA funds.

<b>Case study districts</b>	
<p><b>Dedham</b></p> <p><u>Non-traditional Title I use</u></p> <ul style="list-style-type: none"> <li>▪ Expanded access to extended-year (summer) program for high-risk students in the district</li> <li>▪ After-school support for the two non-Title I Level 2 elementary schools</li> <li>▪ Extended day program for half-day kindergarten students</li> </ul> <p><u>Allocations</u></p> <p>Title I: \$301,627                      Title IIA: \$67,702                      Title IIA roll up into Title I: \$0</p> <p><u>Required reservation funds as % of total Title I</u></p> <ul style="list-style-type: none"> <li>▪ Option A: 0.0%</li> <li>▪ Option B: 1%</li> <li>▪ Option C: 7.1%</li> <li>▪ Option D: 4.9%</li> </ul>	<p><b>Southbridge</b></p> <p><u>Non-traditional Title I use</u></p> <ul style="list-style-type: none"> <li>▪ Extended learning time academic support for lowest-performing students</li> <li>▪ Mentor and instructional coach training for all teachers</li> <li>▪ After-school credit recovery for at-risk high school students</li> <li>▪ Data inquiry training for all teachers in Level 3 schools</li> </ul> <p><u>Allocations</u></p> <p>Title I: \$824,696                      Title IIA: \$143,749                      Title IIA roll up into Title I: \$143,749</p> <p><u>Required reservation funds as % of total Title I</u></p> <ul style="list-style-type: none"> <li>▪ Option A: 0.6%</li> <li>▪ Option B: 3.4%</li> <li>▪ Option C: 7.6%</li> <li>▪ Option D: 16.8%</li> </ul>
<p><b>Stoughton</b></p> <p><u>Non-traditional Title I use</u></p> <ul style="list-style-type: none"> <li>▪ Extended day and extended year programs for students in the lowest-performing elementary school, with option for other district students to participate</li> <li>▪ Pre-kindergarten program for students in lowest-performing school attendance area</li> <li>▪ Behavior, Curriculum, and Data Specialists positions to support teachers in lowest-performing school</li> </ul> <p><u>Allocations</u></p> <p>Title I: \$392,722                      Title IIA: \$100,447                      Title IIA roll up into Title I: \$26,378</p> <p><u>Required reservation funds as % of total Title I</u></p> <ul style="list-style-type: none"> <li>▪ Option A: 8.8%</li> <li>▪ Option B: 0.0%</li> <li>▪ Option C: 11.2%</li> <li>▪ Option D: 0.0%</li> </ul>	<p><b>Westfield</b></p> <p><u>Non-traditional Title I use</u></p> <ul style="list-style-type: none"> <li>▪ Reading interventions for all elementary students identified as needing additional support</li> <li>▪ Student mentor program with academic and social or emotional support for at-risk students</li> <li>▪ Extended day program in two schools to provide interventions and academic support in math and literacy to identified low-achieving students</li> </ul> <p><u>Allocations</u></p> <p>Title I: \$1,178,738                      Title IIA: \$258,554                      Title IIA roll up into Title I: \$0</p> <p><u>Required reservation funds as % of total Title I</u></p> <ul style="list-style-type: none"> <li>▪ Option A: 23.2%</li> <li>▪ Option B: 0.0%</li> <li>▪ Option C: 1.8%</li> <li>▪ Option D: 0.0%</li> </ul>

*Districts used federal resources in ways that aligned with an existing district strategic plans.* New programming was introduced in FY2013 as a result of the waiver flexibility; however, it was more common for districts to expand existing programs to more schools and/or students in the district. District administrators in each site visit district articulated the alignment between Title I and IIA allocations and specific goals in the district’s existing strategic plan. This allowed districts to incorporate Title I- and/or IIA-funded programs into clearly articulated district priorities.

*District leaders relied heavily on the use of student performance data to identify the lowest-achieving students for additional instructional supports funded by Title I resources.* As noted above, flexibility provisions have given districts the opportunity to serve more students with interventions funded by federal resources; many districts are expanding programming district- or school-wide. For those that are not expanding programs to be district- or school-wide, districts have come to use student performance data extensively in an effort to identify the lowest-achieving students, and ensure they participate in interventions aimed at improving student improvement. Specifically, about 43 percent of districts in the analytic sample utilize performance data when identifying students; this represents a greater percentage of districts than those that report teacher identification of students, e.g., about 13 percent of students, or those that use the state's at-risk designation, e.g., about 30 percent of districts (see Appendix D, Figure D1). Further, all case study districts had, or were actively implementing, a common process by which student performance data was reviewed and low-achieving students were identified for support.<sup>g</sup> Districts described using various data sources and methods to identify students for Title I services; for example, one district ordered students by need using performance indices (MCAS scores and local assessment scores).

*District administrators, central office leadership, school leaders, and instructional teams from individual schools collaborated to make decisions about the use of federal resources.* District administrators described a collaborative decision-making process about the use of Title I and/or IIA funds involving central office leadership, school leaders, and instructional teams from individual schools. The process typically began with instructional leadership team meetings in which school leadership discussed school and student needs. Often, the Title I director used information gained in these meetings in conversations with central office staff to discuss new programs and the extent to which these would align with existing district strategies. In Westfield, the Title I director worked closely with instructional and school leaders to evaluate student needs and the extent to which existing programming was meeting these. She then coordinated these efforts with district leadership to ensure Title I-funded programs aligned with other strategic initiatives in the district. In some districts, collaboration drew upon a strong working relationship between the Title I director and the district's fiscal officer, characterized by an iterative process of costing different programmatic options.

*Districts used flexibility provisions to reconsider and adjust staff positions funded by their Title I award, deploying staff in new and different ways to support Title I programs.* Districts used flexibility provisions to reconsider and adjust staff positions funded by their Title I award. While staffing levels in all four site visit districts remained stable from FY2012 to FY2013, district staff were deployed in new and different ways to support Title I programs. Administrators credited flexibility introduced in FY2013 with spurring thinking about how to use staff positions in new and different ways to support the increased number of students that programming would touch. One district leader described the decision-making process as "looking at performance data and staffing assignments to ensure that student needs were being met with staff capacity, and known staff skills and talents matched with specific populations." For example, Stoughton removed a reading specialist position in its lowest-performing elementary school in favor of a data specialist position.<sup>h</sup> The data specialist focused solely on coaching teachers in the use of performance data, identifying common performance trends and gaps in mastery, and introducing instructional techniques aimed at supporting low-achieving students. To accommodate such changes, districts reported moving staff salaries previously supported by Title I funds into district operating budgets, where possible.

*A continuing conversation with state education officials informed districts about flexibility provisions and the completion of their FY2013 Title I application.* With the introduction of flexibility provisions in the FY2013 Title I/IIA application, leaders in all four case study districts anticipated major changes in the use of these federal funds well before their districts' decision-making process about the applications began. Their preparation appeared to influence their engagement with ESE staff about the changes. One district administrator explained, "We had a vision for what we wanted to do. We got clarification from ESE, and then tweaked." All site visit districts reported that they consulted with ESE and found staff to be responsive to information requests. Title I directors and district leaders appreciated this level of support. The districts within Level 3 and 4 accountability status used their District and School Assistance Center (DSAC) Regional Assistance Director as an important resource. This communication focused on the strategic use of Title I/IIA funding, as one district leader describes: "This was really to help us think about how to support everything that happened within the confines of a school day."

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<sup>g</sup> Most districts worked with a consultant or an external vendor to do so.

<sup>h</sup> In two of the four case study districts, Title I funds were allocated for internal positions or external (contract) consultants to provide teacher coaching on the use of student performance data.

## Policy considerations

### For district leaders

*Expand the use of performance data in planning for Title I services as way to serve more students, and students of highest need.* District administrators in our site visit sample report using performance-based criteria as the key designation for which students are targeted by interventions funded with federal resources. With new flexibility provisions, districts have the opportunity to expand the number of students that they were able to serve. In light of the desire to serve students most in need of additional supports within the expanded pool of students eligible for Title I services, district administrators reported developing new ways to use performance data for this purpose. For example, district administrators in our site visit sample initiated such techniques as rank ordering students in each grade-level, and simultaneously reviewing formative and summative assessment results to chart student progress during the school year. The identification of the lowest-achieving students will remain a critical issue; almost all of the site visit districts reported serving more students without a significant increase in federal resources. However, these same district administrators reported flexibility provisions as an essential policy change to support student achievement in their district.

*Evaluate programs in light of results and resources as a key component of district investment strategy.* District administrators know that the current environment of fiscal constraint is likely to continue. Districts that are maximizing flexibility provisions and extending Title I programs to serve more students are doing so in light of strategic discussions about available resources to support student learning. All district administrators interviewed for the purposes of this study described the ways in which they used student data to evaluate program effectiveness. All districts outlined thoughtful decision-making processes in which they asked: “Is what we are funding working?” A few of the site visit districts augmented this process to make resource decisions in light of results; for example, Dedham is attempting to standardize this process by creating a protocol to compare programmatic costs against gains in student outcomes. District administrators are more explicitly considering which Title I/IIA programs might represent the best investments to serve the most students with the greatest need, and achieve the most effective results.

*Incorporate Title I programs and other federal resources into broader district-wide strategies for improving student achievement.* Almost all district administrators reported that they made decisions about how to use flexibility provisions based on established district-based strategic plans for school improvement and student achievement. Even where district administrators introduced new approaches, these were based on expanding existing programs that were found to be successful in meeting student needs. Further, where new programs were established, these were developed in response to goals articulated by the district’s strategic plan. Therefore, the districts that made changes in programming introducing new and/or non-traditional approaches did so as guided by their strategic plan, established well before flexibility was available, and the extent to which programs met student need.

### For state policymakers

*Create opportunities for districts to share information about how they use Title I/IIA funds to target sub-groups of students.* Many districts have made programmatic changes in Title I/IIA programs to support low-achieving students, and applied a district-wide focus to Title I programs. This presents an opportunity for ESE, state associations, and other stakeholders to facilitate conversations among districts to share knowledge about a variety of approaches for federal resource use. This exchange of knowledge on district policies and practices may encourage other districts to incorporate new Title I/IIA-funded programs into district-wide strategies and goals.

*Provide districts with more information on the benefits of flexibility provision, including models of district programming.* A key finding of this study is that many, but not all, districts made programmatic changes coupled with exercising one or more flexibility provisions when applying for Title I/IIA funds during the FY2013 application cycle. And through conducting site visits the study team learned that district administrators knew of additional ways in which they could take advantage of flexibility provisions than what they had opted for in their FY2013 application. Given that FY2013 was the first application year in which flexibility provisions were available to districts, this trend around uptake and programmatic changes is to be expected. However, ESE can continue to provide districts with information on the benefits of flexibility provisions, perhaps offering more tailored assistance based on common district needs.

*Encourage districts to evaluate the effectiveness of their Title I programs.* As noted above, many districts have begun to routinely use performance data, from a variety of sources, to make decisions on programmatic changes in Title I-

/IIA-supported interventions. Several even report having discussions internally about evaluating the results of the interventions in light of resources. ESE may be able to foster this dialogue on the effectiveness of Title I programming; one simple way to do so may be in amending the Title I/IIA combined application. The FY2013 application required districts to describe new, continuing and discontinued Title I programs. ESE could also ask districts to detail why they have opted for the portfolio of Title I programming they have; findings from this study suggest that district administrators may have a data-driven reasons to articulate in response, given the comprehensive and thoughtful reviews taking place in some districts. This small change in the application requirements can potentially seed a more sophisticated conversation about effective Title I programming and investment strategy.

## **Conclusion**

The information presented in this policy brief summarizes the extent to which districts are using flexibility provisions, introduced by Massachusetts' ESEA waiver, and the subsequent program changes in district Title I and IIA programs. Flexibility provisions have resulted in an evolution of districts' decision-making about federal resources to support student learning, as performance data and evaluative criteria are being used more frequently by district administrators to make choices about Title I and IIA funds. Some districts are quickly becoming adept at incorporating federal resources into district strategy and serving more students as they do so. Districts can maximize flexibility and federal resource use to bolster student learning; as one district administrator noted: "flexibility provisions have opened a lot of doors."

## Appendix A. Analytic approach

Figure A1. Process to select districts for participation in case studies.  
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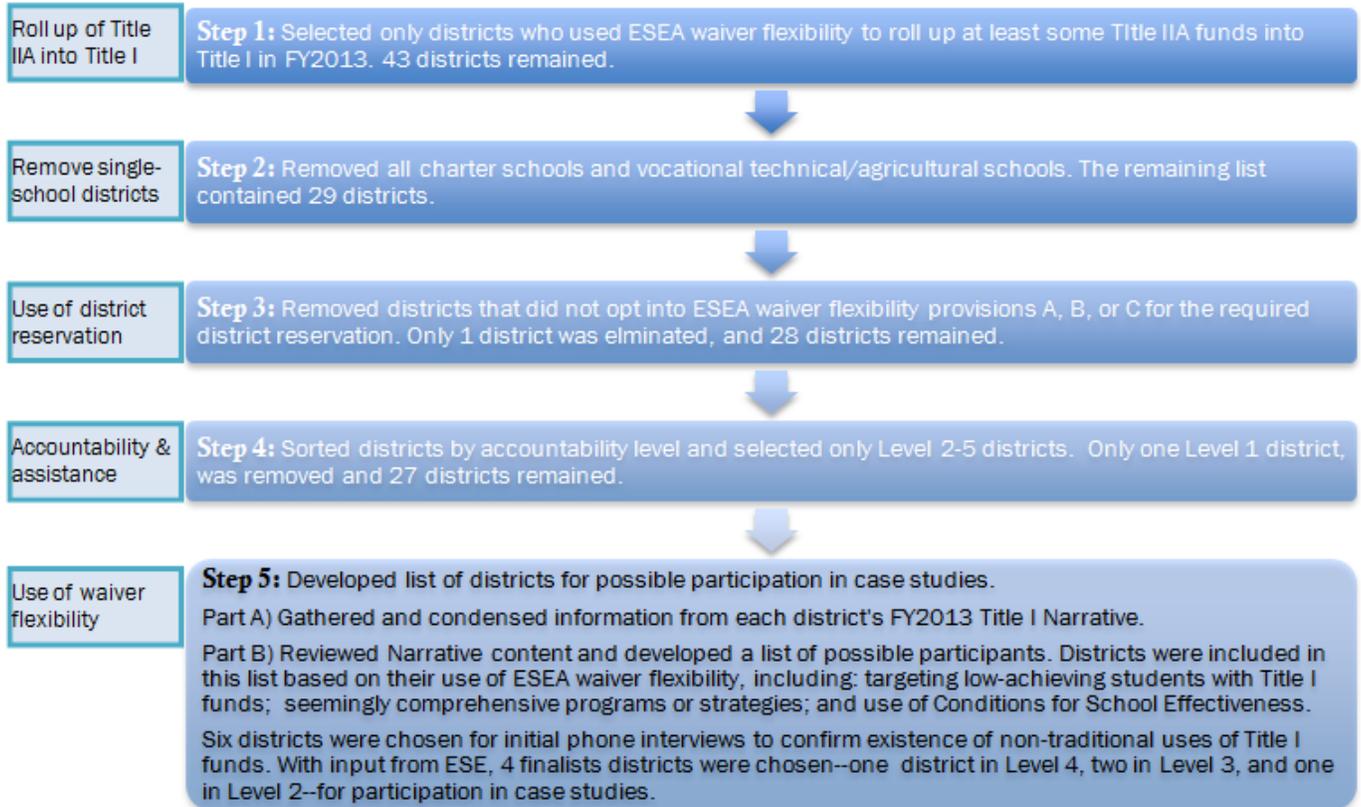


Figure A2. Total Title I FY2013 funds, categorized by district status as flex or non-flex.\*

		Flex	Non-flex
<b>Title I funds</b>	Minimum	\$32,433	\$11,020
	Maximum	\$36,556,537	\$496,034
	Mean	\$1,013,205	\$119,305
	Median	\$241,460	\$79,701

\*Note: Flex districts are those that utilized some form of ESEA waiver flexibility (moved Title IIA funds into Title I and/or allocated some funds in option A, B, or C). The sample of districts included in this analysis used the following counts: flex districts  $n=174$ ; non-flex districts  $n=73$ . Source: Budget summary for fiscal year 2013.

Table reads: "The minimum amount of FY2013 Title I allocation for a flex district was \$32,433."

Figure A3. Total Title IIA FY2013 funds, categorized by district roll-up status

		Roll-up	Non roll-up
<b>Title IIA funds</b>	Minimum	\$17,550	\$1,127
	Maximum	\$4,844,753	\$2,240,829
	Mean	\$372,718	\$103,439
	Median	\$80,416	\$49,267

\*Note: The sample of districts included in this analysis used the following counts: roll-up districts  $n=29$ ; non roll-up districts  $n=232$ . Source: Budget summary for fiscal year 2013.

Table reads: "In non roll-up districts, the average FY2013 Title IIA allocation was \$103,439."

## Appendix B. Strategic choices about flexibility

Figure B1. Average amount of Title IIA FY2013 funds rolled up into Title I by roll-up districts.\*

		Amount of Title IIA funds rolled up into Title I (\$)	Proportion of Title IIA funds that were rolled up (%)
<b>Title IIA funds rolled up into Title I</b>	Minimum	\$1,715	0.6%
	Maximum	\$244,682	100%
	Mean	\$49,470	38%
	Median	\$29,788	28.7%

\*Note: The sample of districts included in this analysis used the following counts: roll-up districts  $n=29$ . Source: Budget summary for fiscal year 2013.

Table reads: "In FY2013, the range of Title IIA funds rolled up into Title I is between \$1,715 and \$244,682 and the proportion of total Title IIA funds flexed into Title I ranges from less than one percent to 100 percent."

Figure B2. Eligibility Criteria for qualifying Title I schools.

### Methods for qualifying Title I schools

**Eligibility criteria**

Districts may use various methods for qualifying Title I schools. The district may serve other schools after serving all with a poverty rate over 75%.

1. *District-wide low-income percentage method.* Under this qualifying method, schools at or above the district-wide poverty average are eligible for services.
2. *Grade span grouping/district-wide percentage method.* Districts identify a particular grade span. Schools serving the same grades are grouped together, and any school at or above the district-wide poverty average in each group is eligible for services.
3. *35% rule.* All district schools at or above 35% poverty are eligible for services.
4. *Grade span grouping/35% rule.* Districts identify a particular grade span. Schools with similar grade spans are grouped together and any school at or above 35% poverty in each group is eligible for services.
5. *Grade span grouping/group-wide percentage method.* Districts identify a particular grade span. Schools serving the same grades are grouped together and any school at or above the group-wide poverty average in each group is eligible for services.
6. *One school per grade span.* The district may serve any school.\*
7. *Total enrollment of less than 1,000 students.* Districts may serve any school.\*

\* Districts using criteria 6 or 7 with more than one school should be able to justify which schools will be served by Title I. For example, if the district contains one school per grade span, it may decide to use academic need rather than poverty percentage as the basis of selecting schools for Title I participation.

Figure B3. Flex districts' reported Eligibility Criteria.\*

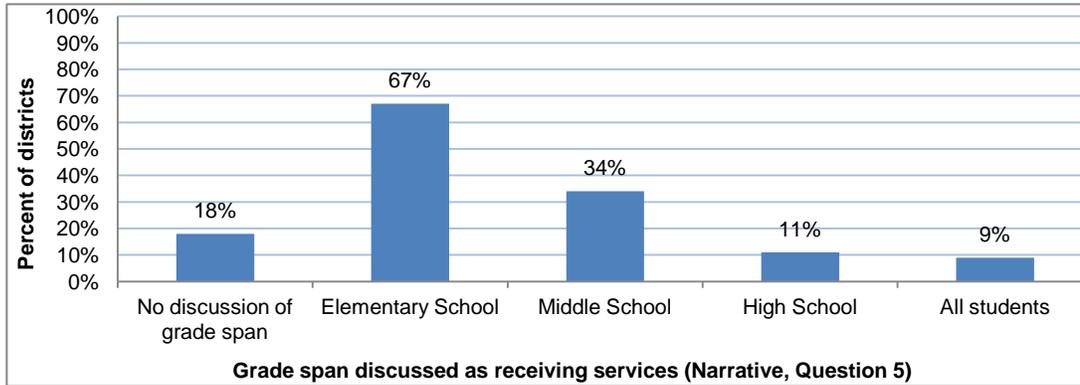
Eligibility Criteria	% of flex districts	
	FY2012	FY2013
35% rule	4%	7%
District-wide low income percentage	16%	19%
Grade-span grouping and 35% rule	13%	11%
Grade-span grouping and district-wide percentage	23%	26%
Grade-span grouping and group-wide percentage	17%	12%
One school per grade span	23%	17%
Total enrollment of less than 1000 students	3%	4%
Blank	1%	3%

\*Note: The sample of districts included in this analysis used the following counts: flex districts  $n=174$ . Source: Title I applications for each fiscal year.

Table reads: "In FY2012, 23% of all flex districts reported Title I eligibility criteria as 'One school per grade span'."

## Appendix C. New approaches to Title I and IIA programming

Figure C1. School grade spans targeted with Title I-funded services in FY2013.\*



\*Note: The sample of districts included in this analysis used the following counts: flex districts with change from FY2012, n=151. Source: Title I applications for fiscal year 2013. Categories are not mutually exclusive.

Figure reads: “In FY2013, 100 flex districts (67% of those in this sample) targeted elementary school students with Title I-funded services.”

Figure C2. Districts’ reported use of FY2013 Title I funds to support student interventions.\*

Content Focus of Title I Intervention	# districts	% districts
ELA interventions	109	72%
Math interventions	76	50%

\* Note: The sample of districts included in this analysis used the following counts: flex districts with programmatic change from FY2012, n=151. Source: Title I applications. Categories are not mutually exclusive.

Table reads: “In FY2013, 76 flex districts (50% of those in this sample) described at least one math intervention to be funded with their Title I allocation.”

(Appendix C continued on next page...)

Figure C3. Districts' reported student and teacher interventions using Title I funds in FY2013.\*

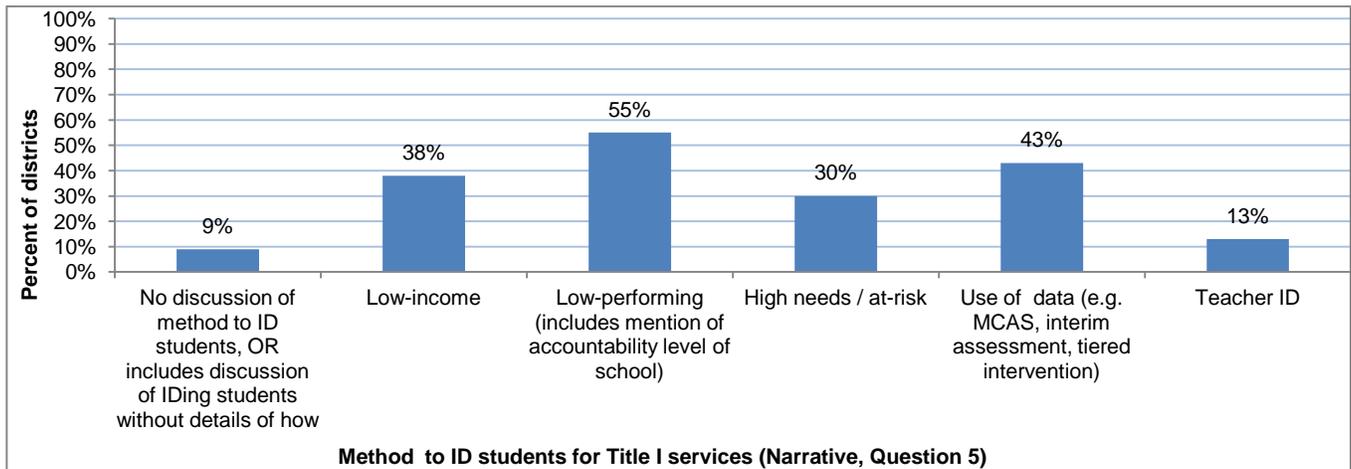
Intervention category	Type of student intervention	# districts	% districts
Interventions involving students	Additional/targeted support in <i>ELA</i> - <b>no time specified</b>	78	52%
	Additional/targeted support in <i>math</i> - <b>no time specified</b>	48	32%
	School-wide <i>ELA</i> program/curriculum (please note name & grade level)	43	28%
	Extended <i>school day</i> - <b>targeted students</b>	40	26%
	Grade-based <i>ELA</i> program/curriculum (please note name & grade level)	37	25%
	School-wide <i>math</i> program/curriculum (please note name & grade level)	31	21%
	Additional/targeted support in <i>ELA</i> - <b>out of school (after/before/weekend)</b>	25	17%
	Additional/targeted support in <i>math</i> - <b>out of school (after/before/weekend)</b>	22	15%
	Additional/targeted support in <i>ELA</i> - <b>in-school/in-class</b>	19	13%
	Grade-based <i>math</i> program/curriculum	20	13%
	Extended <i>school year or summer/vacation</i> program - <b>targeted students</b>	19	13%
	<i>Non-academic</i> intervention (e.g. socio-emotional needs, parent involvement, etc.)	19	13%
	No specific (student) intervention discussed	14	9%
	Additional/targeted support in <i>math</i> - <b>in-school/in-class</b>	12	8%
	Extended <i>school day</i> - <b>school- or district-wide</b>	12	8%
	Additional/targeted support in <i>ELA</i> - <b>summer/vacation program</b>	7	5%
	Extended <i>school year or summer/vacation</i> program - <b>school- or district-wide</b>	7	5%
	Additional/targeted support in <i>math</i> - <b>summer/vacation program</b>	5	3%
	Extended <i>grade level</i> - <b>targeted students</b> (e.g. pre-K or K for some)	5	3%
	Additional/targeted support - <i>no subject provided</i>	1	1%
Grade-based program/curriculum - <i>no subject provided</i>	1	1%	
School-wide program/curriculum - <i>no subject provided</i>	1	1%	
Extended <i>grade level</i> - <b>school- or district-wide</b> (e.g. pre-K or K for all)	0	0%	
Interventions involving teachers	Teacher/tutor/specialists/coach position funded	88	58%
	Professional development for teachers/school leaders/specialists	75	50%
	No specific (teacher) intervention discussed in narrative	34	23%
	Collaborative learning (e.g. professional learning communities)	34	23%
	Review of performance data/data specialist/coaching	22	15%

\* Note: The sample of districts included in this analysis used the following counts: Flex districts with programmatic change from FY2012, n=151. Source: Title I applications for fiscal year 2013, Narrative Question 5. Categories are not mutually exclusive.

Table reads: "In FY2013, 19 Flex districts (13% of this sample) described using Title I funds for a non-academic intervention, such as one targeting socio-emotional health."

## Appendix D. Decisions about flexibility provisions: How four districts sought out comprehensive strategies

Figure D1. Districts' reported method used to identify students for Title I-funded services in FY2013.\*



\* Note: The sample of districts included in this analysis used the following counts: Flex districts with programmatic change from FY2012, n=151. Source: Title I applications for fiscal year 2013. Categories are not mutually exclusive.

Figure reads: "In FY2013, 20 flex districts (13% of those in this sample) described teacher identification of students as the means by which students were identified for Title I-funded services."

## Endnotes

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- <sup>1</sup> Massachusetts Department of Elementary and Secondary Education. (2012). *ESEA Flexibility: Changes to School and District Accountability and Assistance*. Retrieved from: <http://www.doe.mass.edu/apa/titlei/esea/ESEA-flexibility-overview.pdf>.
  - <sup>2</sup> Junge, M. & S. Krvaric. (2011). *An Examination of How the Supplement Not Supplant Requirement Can Work Against the Policy Goals of Title I*. Prepared for "Tightening Up Title I", a conference sponsored jointly by the Center for American Progress and the American Enterprise Institute: March 11, 2011.
  - <sup>3</sup> *Ibid.*
  - <sup>4</sup> *Ibid.*
  - <sup>5</sup> Puma, M.J. (2000). *Exploring New Directions: Title I in the Year 2000*. National School Boards Association. Retrieved from: [www.nsba.org](http://www.nsba.org).