

Title I Update

For District Staff Responsible for Title I Programs



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Introduction

The goal of this update is to provide you with timely reminders of your responsibilities under Title I and guidance to help you meet those responsibilities. This update spans the end of the 2015-16 school year.

Note that this update corresponds approximately to the activities described on page 6 of the Handbook for Title I Directors posted [here](#).

As always, your feedback regarding the usefulness of these updates is encouraged.

Every Student Succeeds Act (ESSA)

Last December President Obama signed into law a reauthorization of the federal Elementary and Secondary Education Act. Called the Every Student Succeeds Act, or ESSA, the new law replaces No Child Left Behind (NCLB) and our state's NCLB flexibility waiver, and will take full effect at the beginning of the 2017-18 school year.

The major changes that the law brings about for Title I relate primarily to assessments, accountability, and support for low-performing schools. ESSA also makes several changes that will impact state and district Title I, Part A programs, such as replacing Highly Qualified teacher requirements with an assurance that all teachers working in Title I-funded programs meet applicable certification and licensure requirements, modifying requirements regarding the equitable participation of non-public school students, reconsidering the definition of supplement not supplant, and provisions regarding education for students in foster care (see Spotlight on page 5 of this Update). The U.S. Department of Education is in the process of developing regulations that will help define these changes, and we will be in touch with you as we learn more about implications of the law's passage on school year 2017-18 Title I programs. In the meantime, please feel free to reach out to us if you have specific questions or concerns about Title I program design for 2017-18.

Contact us at titlei@doe.mass.edu or 781-338-6230 if you have any questions about the contents of this update or more generally about your district's Title I programming.

Fiscal issues

FY15 grant close-out

Title I FY15 year 2 funds should be spent by June 30, 2016. From the Department's perspective, barring unforeseen circumstances districts should be able to expend all FY15 funds by the end of June. If that is not possible, however, the grant may be extended until September 30, 2016 ("FY15 year 3") by contacting ESE's grants management team at GrantsManagement-G3@doe.mass.edu.

At the conclusion of grant activities, districts must submit a final financial report to the Department accounting for the expenditure of funds received. Grants Management has developed a standard form, the "FR1", for collecting this information. The FR1 form must be submitted to Grants Management within sixty (60) days of the end date of the grant, after all figures have been carefully reconciled with the city auditor, town accountant, or district business manager. The FR1 for FY15 Title I funds was sent to all district control users via email on September 18, 2015. Contact GrantsManagement-G3@doe.mass.edu for more details or if you need a copy of the FR1 form.

FY16 year 1 to year 2

On April 13, Grants Management sent the multi-year delegation form to all district control users, and the form was due back on May 6. Using this form, districts were asked to indicate the funds that will be spent through June 30, 2016 and the amount that should be moved into year 2 of the grant, beginning July 1, 2016. A 15% carryover limit still applies to Title I funding, and districts have until September 30, 2016 to spend down at least 85% of the FY16 grant. Any money that is left unclaimed in year 1 will automatically roll over into year 2 of the FY16 grant. For districts that did not submit a multi-year delegation form by May 6, funds moved into year 2 will not be available for request until the September draw-down window.

Comparability reports

Demonstrating comparability of services is an annual requirement for each school district receiving Title I, Part A funds. In accordance with federal law, a school district may only receive Title I 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.

As of early May, ESE Title I staff are in the process of reviewing FY16 comparability calculations for all eligible districts and schools. We will contact Title I directors individually if our analysis indicates that schools in the district may not meet comparability requirements. At that time, you may be asked to send us a copy of the comparability determination report you completed in the fall. As a reminder, we do not collect comparability reports on an annual basis; we only request this documentation when our data review indicates a potential compliance concern and as part of document submission requirements for a Title I program review.

Federal law also requires that a district develop procedures for complying with the comparability requirement. These procedures should be in writing and should, at a minimum, include the district's timeline for demonstrating comparability, identification of the office responsible for making comparability calculations, the measure and process used to determine whether schools are comparable, and how and when the district makes adjustments in schools that are not comparable.

Additional information on comparability can be found on our [website](#) under the topic heading Comparability or by contacting us at titlei@doe.mass.edu.

Preliminary FY17 allocations

On January 21, our office sent a [memo](#) outlining the census estimates that are used to determine Title I allocations for FY17 and how districts can use those estimates for FY17 planning. We currently anticipate no substantial increase or decrease to our statewide Title I, Part A allocation for FY17 as compared to FY16. Note, however, that changes to allocations will vary at the individual district level, and individual district allocations may decrease even if there is an increase to our overall statewide allocation. We expect to receive final allocations from the U.S. Department of Education in late June or early July. The FY17 Title I application will see only minor changes and will be available prior to publication of district-level allocation amounts.

FY16 Title I program review update

We would like to thank all districts that were scheduled for an FY16 Title I Program Review for submitting their documentation for desk-based review. In addition, on-site visits were conducted in a select number of districts to provide context for the desk-based reviews and to better collect data about local practices and needs. Thank you to those districts for your time, cooperation, and kind hospitality.

On April 13, Title I directors who participated in the desk-based review were notified by email of findings and required actions, if any, which resulted from the program review. Title I districts that participated in an on-site visit will receive notification of findings, if any, in the coming weeks. Required follow-up materials are due to ESE by October 7, 2016. Information and sample documents regarding Title I program review can be found on our [website](#).

Every six years, each school district in the Commonwealth is scheduled for a Coordinated Program Review (CPR) of state and federal programs. Districts receiving Title I funds undergo a Title I program review in the same year they are scheduled for a CPR. The review cycle is posted [here](#).

Non-public school outreach and consultation

Each year districts are required to notify officials from non-public schools where eligible students attend of the opportunity to receive Title I services. Services include supplemental academic support for eligible students, related professional development for their teachers, and capacity-building support for their families. Services must be equitable to those provided to eligible public school children, their teachers, and their families. We have prepared a *Sample Letter of Notification to Non-Public Schools* to assist you in performing this outreach to all non-public schools that enroll eligible resident students, whether the schools are located within or outside of district boundaries. The sample letter is available on our [website](#) under the topic heading Private School Services.

Your district is also required to obtain written affirmation that timely and meaningful consultation has occurred with officials from each non-public school **that has elected to participate** in the district's Title I program in SY2016-17. To document that this consultation has occurred, we have prepared a form titled, *Affirmation of Consultation with Participating Non-Public Schools* (see the link directly above). One copy of this form must be submitted to ESE with the district's FY17 Title I grant application for each non-public school in which the district will provide Title I services in SY2016-17.

There will be a breakout session at our June 3 Title I conference on the logistics of non-public school outreach and services, with shared insights from two experienced Title I directors.

Title I data collection

The FY16 Title I Data Collection Application is now available on the Security Portal. A [memo](#) with details and instructions is posted on our website.

All districts receiving Title I funds must report data at the district and school level. District personnel with the *Title I Grant Application and Amendments Drop Box* security role can access the application. The Directory Administrator in your district assigns this role. A list of Directory Administrators in each district is available [here](#). The deadline for submitting FY16 Title I data is **Thursday, July 14, 2016**.

Program evaluation and needs assessment

Federal law requires districts to annually evaluate the impact of the district's Title I program on student outcomes and family engagement. In addition, prior to the start of the next school year, the district is required to conduct a needs assessment to establish priorities for action and make appropriate decisions about the allocation of resources. Title I districts should have procedures in place to document both the Title I program evaluation and the needs assessment process.

There will be a district-led breakout session at our June 3 Title I conference on the topic of program evaluation and needs assessment.

Sample documentation to assist with program evaluation and needs assessment can be found [here](#) under Tabs 10, 11, and 12.

June 3 Title I & Title IIA statewide conference

We hope to see you at the upcoming Title I and IIA statewide conference on June 3 at the Best Western Royal Plaza Hotel in Marlborough, MA. If you have not already done so, please register for the conference [here](#). A draft agenda was emailed to all Title I directors on May 9.

If you have any questions about the conference please email titlei@doe.mass.edu.

Other technical assistance opportunities

We will be holding technical assistance opportunities in various formats throughout the summer, focusing on completing the FY17 Title I application workbook. The dates are not yet set, but these types of opportunities will be offered:

- Webinars – we will hold several webinars in late June and early July on completing the FY17 application workbook.
- Regional networking meetings – meetings will be held per region (during summer) to provide an opportunity for networking with other Title I directors and a hands-on working session to complete the FY17 grant application with colleagues and assistance from an ESE liaison.
- In-person training for new Title I directors – during the summer, new Title I directors will have an opportunity to participate in an in-person training session on the FY17 application workbook at the ESE training room in Malden.

Be sure to keep Title I director contact information up to date in Directory Administration (DA). We pull from this database when sending out important communications to Title I directors. See our [website](#) for more information on DA and for a list of district-level directory administrators.

We will email Title I directors about these opportunities once they are scheduled.

Title I calendar at a glance

May

- Submit requests to amend grants, as needed.
- Collect signed time & effort records for split-funded staff.
- Conduct program evaluation & write a summary of that evaluation.
- Conduct needs assessment based on findings of program evaluation.
- Begin outreach to non-public school leaders of schools where eligible students attend.

June

- Submit requests to amend grants, as needed.
- Collect semi-annual certifications (2 of 2) for Title I personnel whose compensation is funded solely from Title I.
- Collect signed time & effort records for split-funded staff.
- Review & update supplement, not supplant policy & procedure, if needed.
- Review & update district parent / guardian involvement policy based on data (e.g., evaluations).
- Review & update school - parent/guardian compact.
- Prepare to submit FY17 Title I application

July

- Submit Title I data (for previous fiscal year) via the Department's Title I Data Collection Application on the ESE Security Portal
- Submit Title I grant application

August

- Review and update student selection criteria sheet and student selection procedure for Targeted Assistance programs
- Submit Final Financial Report (FR-1) to Grants Management (for ESEA grants ending in June)



Spotlight on: Students in foster care under ESSA

The Every Student Succeeds Act (ESSA) includes new provisions aimed at improving the educational stability of students in foster care. Under the new law, districts receiving Title I funds must collaborate with state or local child welfare agencies to develop plans to allow students in foster care to remain in their school of origin unless it is not in their best interest. Unlike other changes in ESSA, which will be implemented at the start of the 2017-18 school year, the foster care changes take effect on December 10, 2016. AASA, the School Superintendents Association and the National Association for the Education of Homeless Children and Youth have developed some helpful [guidance](#) on this topic. Later this summer ESE will provide districts more information about the changes.

View this update and past Title I Updates at www.mass.gov/ese/titlei - click on Title I Part A, then click on Title I Handbook & Guidance

For Title I questions: titlei@doe.mass.edu / 781-338-6230
For accountability related questions: ESEA@doe.mass.edu / 781-338-3550
