List of required materials by topic area

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Description of materials and required evidence

Guidance and sample documents are posted at www.doe.mass.edu/apa/titlei/parta/review/default.html.

Fiscal procedures

Tab 1	Comparability procedure
Documentary evidence:	Submit a dated copy of the district's written comparability procedure for the current school year (\$Y2014-15).
Required of:	All districts except single school districts and districts with one school per grade span

Districts are required to use district funds to provide educational services in Title I schools that are comparable to the services provided in non-Title I schools. Each year Title I districts are required to demonstrate through appropriate documentation that they are in compliance with the Title I comparability requirements. The district's comparability procedure should be in writing and state that comparability is an annual requirement. It should identify the office responsible for making the comparability calculations and sources of the data and should include the measure and process used to determine whether schools are comparable. The procedure should also include the district's timeline for demonstrating comparability and how and when the district makes adjustments in school staffing when schools are not comparable. A sample procedure can be seen here.

Tab 2	Comparability demonstration (updated annually)
Documentary evidence:	Submit completed comparability forms (either the "traditional" forms A through D or the automated forms, which are recommended) for SY2014-15 . Comparability forms for SY2014-15 will be available and posted at the beginning of the school year.
Required of:	All districts except single school districts and districts with one school per grade span

The comparability demonstration is comprised of forms documenting equivalence in the assignment of instructional personnel. In addition, districts must maintain on file a district-wide salary schedule and a statement regarding the policy and procedures to ensure equivalence in the provision of instructional materials and supplies. For comparability forms and instructions, please go here.



Massachusetts Department of Elementary and Secondary Education

75 Pleasant Street, Malden, Massachusetts 02148-4906

Telephone: (781) 338-3000

May 28, 2015

Dear Dr. Rodrigues,

Thank you for submitting materials for your district's FY15 Title I Program Review and for the time and effort taken to make the FY15 Title I Program Review visit as successful as it was. The review team gained greater insight as to how the school uses Title I resources to raise achievement for all students. We commend Worcester Public Schools for the strategic use of Title I funds and for efforts to improve instruction for all students, the use of data to improve instruction, and the establishment of community libraries.

Our staff has reviewed the information submitted by your district and determined that the district has provided sufficient evidence to successfully complete the requirements of the program review. There are no follow-up actions to complete.

Your time, effort, and cooperation with required monitoring activities are greatly appreciated. If you have any questions or concerns about the content of this letter please feel free to contact our staff at titlei@doe.mass.edu or (781) 338-6230.

Sincerely,

MPakos

Matthew Pakos, Administrator School Improvement Grant Programs

c: Superintendent or Charter School Leader

Last Updated July 2014



2014-15 Title I Program Review Procedures

The Title I program review is a regular, systematic examination of a local school district's administration and implementation of the Title I, Part A grant program. The purpose of this guide is to help district Title I directors assemble the documentation required for a program review and to help them strengthen their existing Title I programs.

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This document and additional information about the Title I program review process, including sample documents that can be modified for district use, are posted at www.doe.mass.edu/apa/titlei/parta/review/default.html.

Questions may be directed to titlei@doe.mass.edu or 781-338-6230.

Purpose of the review

The Title I program review, in conjunction with other state and federal program reviews, aims to ensure that all children in Massachusetts have a fair, equal, and significant opportunity to obtain a high-quality education. The review provides evidence that Title I programs and policies exhibit a focus on improving student academic achievement and ensures district compliance with statutory and regulatory requirements. In addition, the review is a means of holding school districts accountable for appropriate use of resources. By informing the Massachusetts Department of Elementary and Secondary Education (ESE) of local activities and needs, the program review also allows the state to identify both effective delivery models and technical assistance needs.

The program review encompasses the following topic areas:

- 1. Fiscal procedures
- 2. Parent/guardian communications
- 3. Program design and evaluation
- 4. Data collection and management
- 5. Opportunity and equal educational access

Review process and timeline

Every six years each district in the Commonwealth is scheduled for a Title I program review. Title I uses the same schedule as the Coordinated Program Review (CPR) of state and federal programs (the schedule is available at www.doe.mass.edu/pga/review/cpr/6yrcycle.html).

The Title I program review process is as follows:

- ESE notifies each district scheduled for a Title I program review of the timeline for submitting required materials. In general, all required documentation must be submitted to ESE within 60 days from the date of notification.
- After the materials have been received, ESE staff review the documentation using the review criteria described on the following pages.
- In certain cases, ESE staff may conduct interviews with district staff and/or schedule on-site visits to review additional documentation, interview relevant staff, and observe programs in Title I schools. Districts will be notified well in advance if a one-day, onsite visit will be conducted.
- 4. Following the review, ESE issues a report to the district describing any findings that do not meet the specified criteria and detailing required actions, if any. Districts have a specified timeframe within which to submit evidence that required actions have been taken.
- The district receives final approval once ESE has determined that the district is in compliance with all review criteria and has taken all required actions.

Organizing and submitting materials for review

To facilitate the review, ESE asks that each district organize documentation uniformly, either electronically (preferred method) or by hard copy. Each piece of documentation must be labeled by tab according to the list in the section titled, "List of required materials by topic area" which is found below.

- If the materials are submitted electronically, they must be submitted together in the same media (e.g., flash drive, CD, or DVD) and the filenames must be clearly labeled. In addition, the media must contain a Microsoft Word document with contact information.
- If the materials are submitted as hard copies, they must be organized by tabbed dividers in a three-ring binder or file box with the name of the district and the year of the review clearly labeled. Contact information must be provided in the front of the binder or file box.

Once the necessary documentation has been collected and organized using one of the above two options, the materials may be delivered to ESE via mail or in person. (A duplicate copy of the materials should be kept for district records, since ESE does not mail materials back to the district.)

Mail the electronic media, binder, or box to:
FY15 Title I Program Review
ATT: Julia Foodman
School Improvement Grant Programs
Massachusetts Department of Elementary and Secondary Education
75 Pleasant Street
Malden, MA 02148

 Deliver materials in person to the front desk of the Massachusetts Department of Elementary and Secondary Education in Malden. For directions, visit www.doe.mass.edu/contact/doedirections.html.

List of required materials by topic area

Fiscal procee	lures
Tab 1	Comparability procedure
Tab 2	Comparability demonstration
Tab 3	Supplement, not supplant policy and procedures
Tab 4	Documentation of Title I expenditures per school building
Parent/guar	dian communications
Tab 5	District and school parent/guardian involvement policies
Tab 6	School-parent/guardian compact
Tab 7	Documentation of parent/guardian outreach and involvement
Tab 8	Parent/guardian notification – report cards
Tab 9	Parent/guardian notification – right-to-know (teacher not meeting "highly qualified" requirements)
Program des	ign and evaluation
Tab 10	Needs assessment procedure
Tab 11	Program evaluation procedure
Tab 12	Program evaluation summary, including non-public school service, if any
Tab 13	Targeted assistance program plans
Tab 14	Schoolwide program plans
Tab 15	Accountability related required actions – levels 2-5 (site visit districts only)
Data collectio	on and management
Tab 16	Title personnel lists
Tab 17	Time and effort records
Tab 18	Student selection procedure in targeted assistance schools

Tab 3 Supplement, not supplant policy and procedures		
Documentary evidence:	Submit the most current, dated copy of the district's supplement, not supplant policy and procedures document. The procedure must include description of the means by which the policy is disseminated to personnel involved with Title I.	
Required of:	All districts	

The district's supplement, not supplant policy and procedures describes how the district ensures that Title I funds are used only to supplement, not supplant, state and local funds that would, in the absence of Title I funds, be spent on Title I students. (Please note: it is not required that the district use the word 'policy' to describe this document, as in some cases this would require approval from the school committee.) For a sample procedure, please go here.

Tab 4 Documentation of Title I expenditures per school building (current and prior ye	
Documentary evidence:	Submit an accounting of total expenditures per Title I school building for the combined months of October and November 2014 as well as total expenditures per Title I school building from SY2013-14. Instructional expenditures include all Chart of Accounts "Account 2000" expenditures from the end of year report (see your business manager for details).
Required of:	All districts

Districts must provide an accounting of Title I instructional expenses for each school. The current year report lists Title I expenditures from October and November 2014. The prior year report lists the Title I expenditures per served school from SY2013-14. Expenditures included in the total are all Chart of Accounts "Account 2000" expenditures (see your business manager for details). These instructional expenditures include: school building leadership, instruction – teaching services, instructional materials and equipment, professional development costs, coaching, guidance counseling, testing services, and psychological services. For more information, please go here.

Parent/guardian communications

Tab 5	District and school parent/guardian involvement policies
Documentary evidence:	Submit the most current, dated copy of the district's and each Title I school's parent/guardian involvement policy. Submit evidence that the district policy and each Title I school's policy has been reviewed by parents and revisions have been made in an updated policy. Evidence can include relevant meeting agenda items, meeting notes, and written parental feedback.
Required of:	All districts and all Title I schools

Districts and Title I schools must develop jointly with, annually evaluate with, and distribute to parents/guardians of Title I students (or, in the case of schoolwide programs, all students) written parent/guardian involvement policies. These policies are intended to:

- establish the district's and each Title I school's expectations for parent/guardian involvement
- describe how the district and served schools will involve parents/guardians in developing the district and school improvement plans and in reviewing school performance
- provide support to assist Title I schools in planning and implementing effective parent/guardian involvement activities to improve student achievement
- build the schools' and parents'/guardians' capacity for strong parental involvement
- coordinate and integrate parent/guardian involvement strategies with other programs (e.g., Head Start program, etc.).

(Please note: it is not required that the district use the word 'policy' to describe this document, as in some cases this would require approval from the school committee.) For more information on district and school parent/guardian involvement policies, go <u>here</u>.

Tab 6	School-parent/guardian compact (updated annually)	
Documentary evidence:	Submit one copy of the school-parent/guardian compact from each Title I school from SY2014-15 .	
Required of:	All Title I schools	

The school-parent/guardian compact is a written agreement that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the state's high standards. In a targeted assistance program, compacts should identify specific grades and subject areas served and are only distributed to families of students served by Title I funds. In a schoolwide program, compacts are distributed to all families. For more information on compacts, including a sample compact, please go here.

Tab 7 Documentation of parent/guardian outreach and involvement	
Documentary evidence:	For each Title I school, submit the dated notice sent to parents informing them of the annual Title I meeting. Provide a limited sampling of evidence to show that the required communication and training was provided to parents/guardians of Title I students to promote parent/guardian involvement at each Title I targeted assistance school and to all parents/guardians at each Title I schoolwide program school in SY2014-15 and/or SY2013-14.
Required of:	All Title I schools

Districts and schools are expected to involve parents/guardians of students served by Title I funds in a targeted assistance program or the parents/guardians of all students in the school in a schoolwide program. Evidence includes copies of meeting agendas, workshop flyers, sign-in sheets, and other documentation that demonstrates the district helps parents/guardians understand such aspects as: the state's high standards, state and local academic assessments, including alternative assessments, the parental involvement requirements of Section 1118 of the Elementary and Secondary Education Act (ESEA); how to monitor their child's progress and work with educators to improve the achievement of their child, how to become involved in performing annual needs assessments for each Title I school (both schoolwide and targeted assistance programs), and how to become involved in the revision of school and/or district improvement plans for schools and districts classified into Levels 2-5.

Tab 8	Parent/guardian notification – report cards (updated annually)
Documentary evidence:	Submit a copy of the dated cover letter sent to parents/guardians from each Title I school in the district in SY2014-15 that accompanied the report card/overview. Do not submit a copy of the report card/overview itself. Submit a signed assurance form attesting to the fact that all parents/guardians were sent
	cover letter and report card/overview.
Required of:	All Title I schools

Districts receiving Title I funds must annually prepare and distribute district and school report cards to the parents/guardians of all children enrolled in district schools. For SY2014-15 districts can meet this requirement by sending a Department generated report card or report card overview to parents/guardians in at least one of the following ways: (1) via U.S. mail; (2) by distributing hard copies to parents/guardians, such as giving report cards/overviews to students to bring home in their backpacks; or (3) electronically. The full report cards must be posted on the school and district websites. Guidance and resources on report cards, including a sample report card cover letter can be found here. The Report Card Assurance form is here.

Tab 9	Parent/guardian notification – right-to-know (teacher not meeting "highly qualified" requirements)
Documentary evidence:	If applicable, submit evidence that parents/guardians were notified in a timely manner if a teacher who was not highly qualified taught children for four or more weeks (regardless of whether or not the teacher is being paid with Title I funds).
Required of:	Title I schools where a non-highly qualified teacher taught for four or more weeks

Timely notice that the parent's child has been assigned or has been taught for four or more consecutive weeks by a teacher who is not highly qualified (regardless of whether or not the teacher is being paid with Title I funds) must be provided, as applicable. This requirement can be combined with the report card overview letter. A sample letter can be found <a href="https://example.com/hete-sample-

Program design and evaluation

Tab 10	Needs assessment procedure
Documentary evidence:	Submit a copy of the most current , dated summary of the district's procedure for assessing areas of greatest academic need.
Required of:	All districts

Districts are required to conduct annual needs assessments for each Title I school (both schoolwide and targeted assistance programs) that include data on student achievement relative to state standards, and input from parents and educators. The needs assessment procedure briefly describes how the district and schools conduct their needs assessments in order to establish priorities for action and make appropriate decisions about the allocation of resources (e.g., people, materials, time, and fiscal, including all funds under ESEA). This includes a description of the quantitative and qualitative data collected and analyzed, who is involved in the analysis, how priority needs are determined, and how school improvement plans and other documentation relate to this process. A sample needs assessment procedure can be found here.

Tab 11	Program evaluation procedure
Documentary evidence:	Submit the most current, dated copy of the written procedure for evaluating Title I program implementation and impact.
Required of:	All districts

Tab 12	Program evaluation summary, including non-public school service, if any (updated annually)	
Documentary evidence:	Submit a copy of the program evaluation summary and findings from the previous year's Title program in the district (SY2013-14), including evaluation of any services provided to eligible students in non-public schools.	
Required of:	All districts	

The program evaluation summary is a written summary of the process, findings and actions resulting from evaluation of the Title I program in each Title I school. This includes a list of strengths and weaknesses of the program (including any non-public school service) as indicated by findings from data analysis, and description of any consequent program changes made. For more information, including a sample, please go here.

Tab 13	Targeted assistance program plans (updated annually)
Documentary evidence:	Submit completed template (below) documenting composition of current school year (SY2014-15) Title I program in each targeted assistance program school. (<i>Not applicable to schoolwide programs</i>).
Required of:	Title I schools with targeted assistance programs

Tab 14	Schoolwide program plans (updated annually)
Documentary evidence:	Submit a copy of the current, dated schoolwide plan or school improvement plan that incorporates the schoolwide plan for each schoolwide school. Each of the ten required components of a schoolwide plan must be labeled or marked with tabs. (Not applicable to targeted assistance programs).
Required of:	Title I schools with schoolwide programs

A schoolwide program is one in which districts have elected to use Title I funds in combination with other federal, state, and local funds to upgrade a school's entire educational program. It is not necessary for the schoolwide plan to be separate from the school improvement plan. The school improvement plan must make clear, however, how and where the ten components of the schoolwide plan are addressed within the school improvement plan. The schoolwide plan must demonstrate how schools in each district that is not reserving funds under Title I for homeless students is providing for appropriate services in schoolwide programs. Guidance on schoolwide programs can be found here.

Tab 15 (<u>site visit</u> districts only)	Accountability related required actions – levels 2-5
Documentary evidence:	Gather evidence that SY2013-14 required reservation amounts for interventions and supports have been expended (do not submit to ESE – present upon ESE visit to district). Gather data to support FY15 grant application description of impact of intervention and support activities (do not submit to ESE – present upon ESE visit to district).
Required of:	Districts in levels 2, 3, 4, or 5 who are notified of selection for site visit by ESE as part of FY15 program review

Districts classified into levels 2-5 are required to reserve a portion of the district's Title I, Part A allocation (between 5 and 20 percent on a sliding scale determined by ESE) to be spent on additional interventions and supports that address the needs of the district's lowest-achieving students. The impact of activities must be monitored and reported in the district's grant application for funding of these activities to be continued. Additional information will be provided prior to site visit. More information can be found here">here.

Data collection and management

Tab 16	Title I personnel lists
Documentary evidence:	Submit listing of all Title I staff broken down by Title I school, individual, and FTE, including all Title I stipended positions broken down by school and individual (see Payroll Manager for supporting documentation).
Required of:	All districts

The Title I Personnel List is the district's accounting of Title I personnel information for SY2014-15. A sample personnel list can be found <u>here</u>.

Tab 17	Time and effort records (updated as completed)
Documentary evidence:	Submit updated and complete time and effort records for all Title I staff (full-, part-, split-time, and/or stipends) for the first half of the 2014-15 school year (September to December/January 2015).
Required of:	All districts

Districts must maintain auditable "time and effort" records that show how each Title I employee spent his or her compensated time. These records are written, after-the fact (not estimated or budgeted) documentation of how the time was spent. Time and effort records must be prepared by any Title I staff with salary or stipend 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. For "full-time" staff, each district must submit copies of signed semi-annual certifications documenting that staff work solely in activities supported by the Title I grant. For "split-time" staff, each district must submit documents that describe time spent on Title I and other activities. For any Title I staff paid a stipend, each district must submit documents that describe the amount paid and hours worked on Title I activities.

(Note: If a school operating a schoolwide program consolidates federal, state, and local funds in a consolidated schoolwide pool, an employee who is paid with funds from that pool is not required to file a semi-annual certification. Because federal funds are consolidated with state and local funds in a single consolidated schoolwide pool, there is no distinction between staff paid with federal funds and staff paid with state or local funds. A school that consolidates federal funds in its schoolwide program is not required to meet most of the statutory and regulatory requirements of the specific federal programs included in the consolidation. However, the school must ensure that it meets the intent and purposes of the federal programs included in the consolidation so that the needs of the intended beneficiaries are met. A schoolwide school must identify in its schoolwide plan which programs are included in its consolidation and the amount each program contributes to the consolidated schoolwide pool.) For more information, including sample time and effort records, please go here.

Tab 18	Student selection procedure in targeted assistance schools
Documentary evidence:	Submit a copy of the current, dated student selection procedure used in targeted assistance program schools to identify students for participation in the Title I program in SY2014-15 . (Not applicable to schoolwide programs.)
Required of:	Title I schools with targeted assistance programs

Districts must have a procedure outlining the process used in targeted assistance schools to identify students failing or most at-risk of failing to meet the state's challenging student academic achievement standards based on multiple, educationally related objective criteria established by the district and supplemented by the school. For more information, including a sample procedure, please go here.

Tab 19	Title I targeted assistance program student selection criteria (updated annually)
Documentary evidence:	Submit a copy of the current school year's (SY2014-15) student selection criteria sheets for each subject and grade served in targeted assistance programs. (Not applicable to schoolwide programs.)
Required of:	Title I schools with targeted assistance programs

Students are selected for participation in Title I targeted assistance programs based on multiple, objective, educationally-related criteria. Selection criteria are weighted by attaching a range of points to each one. Screened students with the highest scores, therefore, exhibit the greatest academic need for program participation. For sample student selection criteria forms, please go here.

Tab 20	Rank-ordered student selection list of Title I students in targeted assistance program
Documentary evidence:	Submit copies of the current school year's (SY2014-15) lists of students screened for selection. Lists should be by subject and grade served and include individual student total scores, listed in descending order. To protect student confidentiality, please do not include student names (remove or white-out). (Not applicable to schoolwide programs.)
Required of:	Title I schools with targeted assistance programs

Districts must maintain rank-ordered lists of Title I students that list, from highest total selection criteria points to lowest, each student screened for targeted Title I assistance. Lists include selection score, indication of selection for service or not, and notation of any required services already provided (such as special education or English language learner services). For a sample rank order selection form, please go here.

Opportunity and equal educational access

Tab 21	Offer of consultation to eligible non-public schools (updated annually)
Documentary evidence:	Submit evidence of offers of consultation regarding service to each eligible non-public school listed on the non-public school participation worksheet of the district's application for the current school year (SY2014-15). Evidence must show that offers were received by all eligible schools (e.g., signed confirmation or return receipt slips).
Required of:	All districts except charter schools, regional vocational schools, and districts where no students attend non-public schools

Districts are required to provide eligible children attending non-public elementary and secondary schools, their teachers, and their families with Title I services or other benefits, such as professional development, parent involvement, or materials and supplies (on loan from the public schools), that are equitable to those provided to eligible public school children, their teachers and their families. Evidence of non-public school outreach and programming includes signed confirmation or return receipt slips from eligible non-public school leaders that consultation on providing services to eligible non-public school students has been offered. If services are accepted, districts must submit affirmation from non-public schools of consultation in all required areas (see Tab 22). For more information, including sample letters districts can send to non-public schools, please go here.

Tab 22	Affirmation of consultation with participating non-public school officials and description of services
Documentary evidence:	Submit a clear, concise description of services being provided to each participating non-public school in SY2014-15 . See Tab 13 for instructions regarding how to document targeted assistance program plans. (As part of the annual application for Title I funds, districts submit a signed copy of the <i>Affirmation of Consultation with Participating Non-Public School Officials</i> form for each participating non-public school.)
Required of:	Districts with participating non-public schools

Title I statute and regulations require that timely and meaningful consultation occur between school district staff and non-public school officials prior to any decision that affects the opportunities of eligible non-public school children, teachers, and other educational personnel to participate in Title I programs. Written affirmation of consultation covering the nine required components must be obtained from an authorized representative of each participating non-public school. For a sample affirmation of consultation form, please go here.

Tab 23	Third-party contracts
Documentary evidence:	Provide copies of any third-party contracts with providers of the district's equitable services to eligible non-public school students in SY2014-15 . Contracts must specify the amount or percentage of funds used for administrative costs. Contracts for more than one type of service (e.g., student tutoring and staff professional development) must delineate the specific amount for each type of activity.
Required of:	Districts with participating non-public schools using third party providers

Districts may provide services to eligible non-public school children either directly or through arrangements with another district or a third-party provider. If the district contracts with a third-party provider, the provider must be independent of the non-public school and of any religious organization and the contract must be under the control and supervision of the district. Contracts must provide technical descriptions of the Title I services with detail sufficient to enable the district to determine that the Title I statutory and regulatory requirements will be met as required by Section 9306 of the ESEA. For more information on third-party contracts, please go here.

Tab 24	Neglected or delinquent (N or D) facility coordination (updated annually)
Documentary evidence:	Districts with neglected or delinquent (N/D) facilities located within their district boundaries must submit a copy of the required formal agreement for SY2014-15 between the district and facility for whom the district is fiscally responsible for Title I funds. (Only applicable to districts with eligible N/D facilities within district boundaries.)
Required of:	Districts with a neglected or delinquent facility

Title I, Part D (The Prevention and Intervention Program for Children and Youth Who Are Neglected, Delinquent, or At-Risk) assists the education of certain disadvantaged children. Allocation notices are sent directly to public school districts with an eligible neglected or delinquent facility located within their boundaries. For more information, including a sample formal agreement, please go here.