



2016-17 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 <http://www.mass.gov/edu/government/departments-and-boards/ese/programs/accountability/financial-support/title-i-and-other-federal-support-programs/title-i-part-a/program-review.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/pqa/review/cpr/6yrcycle.html).

The Title I program review process is as follows:

1. ESE notifies each district scheduled for a Title I program review of the timeline for submitting required materials.
2. After the materials have been received, ESE staff review the documentation using the review criteria described on the following pages.
3. 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.
5. 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 and organized by tabs. 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:
FY17 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 (label materials *For Julia Foodman*). For directions, visit www.doe.mass.edu/contact/doedirections.html.

List of required materials by topic area

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List of required materials by topic area

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Description of materials and required evidence

Guidance and sample documents are posted at <http://www.mass.gov/edu/government/departments-and-boards/ese/programs/accountability/financial-support/title-i-and-other-federal-support-programs/title-i-part-a/program-review.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 (SY2016-17).
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.

Tab 2	Comparability demonstration (updated annually)
Documentary evidence:	Submit completed comparability forms for SY2016-17 . Comparability forms for SY2016-17 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.

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.)

Tab 4	Documentation of Title I expenditures (current and prior year)
Documentary evidence:	Submit an accounting of Title I expenditures for the combined months of September through November 2016 as well as Title I expenditures from SY2015-16 .
Required of:	All districts

Provide a computer generated Title I expenditure report for FY16 and FY17 (September through November 2016). The School Business Administrator will be able to download these reports from the district ERP software program (e.g., MUNIS or Sage). If school level data is readily available, please include in your submission.

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.)

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 SY2016-17 .
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.

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 SY2016-17 and/or SY2015-16 .
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 SY2016-17 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 SY2016-17 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 assurance form is found [here](#) under Tab 8.

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

Please leave Tab 9 empty. Parent/guardian notification related to individual teachers not meeting Highly Qualified requirements is not in effect after the 2015-16 school year.

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.

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

Districts are required to evaluate their Title I programs at least annually. The program evaluation procedure describes how each school's Title I program, including participating non-public school programs and parent/guardian involvement policies and procedures, is annually evaluated for impact on student achievement. The procedure describes the data used, constituents consulted, process used to arrive at evaluation findings, and how these findings are utilized for planning and improvement.

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 I program in the district (SY2015-16), 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.

Tab 13	Targeted assistance program plans (updated annually)
Documentary evidence:	Submit completed template documenting composition of current school year (SY2016-17) 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

A "targeted assistance program plan" is documented by completing the template provided [here](#) under Tab 13. The form provides a summary of what is being taught to whom, by whom (e.g., number and type of teachers / paraprofessionals); in which grades; and using which model (e.g., inclusion or pull-out). Districts are required to develop targeted assistance program plans that are coordinated with and support regular education program(s) in relevant schools. Title I staff must be integrated with regular instructional staff in all activities, and targeted assistance programs must: (1) Use effective instructional methods and strategies that strengthen the core academic program of the school; (2) Use multiple, educationally related, objective criteria to identify children failing, or most at risk of failing, to meet the state's academic achievement standards (children in grades PK-2 selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally

appropriate measures); (3) Give primary consideration to providing extended learning time for served students; (4) Provide an accelerated, high-quality curriculum; and (5) Minimize the removal of children from the regular classroom during regular school hours.

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. <i>(Not applicable to targeted assistance programs).</i>
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 or related document for charter schools. 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.

Tab 15 (site visit districts only)	Accountability related required actions – levels 2-5
Documentary evidence:	Gather evidence that SY2015-16 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 FY17 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 FY17 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.

Data collection and management

Tab 16	Title I personnel lists
Documentary evidence:	Submit listing of all Title I-paid staff broken down by Title I school or district office and FTE, including all Title I stipended positions broken down by school and district office (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 SY2016-17.

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 2016-17 school year (September to December/January 2017).
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 for 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, however, that semi-annual certifications are possible for certain staff who are funded through multiple sources (split-funded) or on multiple activities, but maintain a consistent work schedule. The certification must (1) cover a semi-annual period, (2) identify Title I as the program worked on, and (3) be signed and dated by the employee or supervisor. Districts choosing to use this system must complete and keep on file an Annual Management Certification form certifying that only eligible employees will participate in the substitute system and that the system used to document employee work schedules includes sufficient controls to ensure that the schedules are accurate.

(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. Where 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.)

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 SY2016-17 . (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.

Tab 19	Title I targeted assistance program student selection criteria (updated annually)
Documentary evidence:	Submit a copy of the current school year's (SY2016-17) 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.

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 (SY2016-17) 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). (<i>Not applicable to schoolwide programs.</i>)
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).

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 (SY2016-17). 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).

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 SY2016-17 . 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.

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 SY2016-17 . 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.

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 SY2016-17 between the district and facility for whom the district is fiscally responsible for Title I funds. <i>(Only applicable to districts with eligible N/D facilities within district boundaries.)</i>
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.

Detailed program review criteria

The criteria below are based on the statutory requirements of Title I programming and serve as the basis for the report of findings (if any). This is the evidence ESE uses to verify compliance. Please note that in addition to the evidence specified below, ESE may request additional district records to verify compliance.

PLEASE NOTE: Document submission should not be organized according to the program review criteria below. Rather, documents for submission must be organized according to the list of tabs on the preceding pages.

Fiscal Procedures	
CRITERIA	EVIDENCE
<p>1-A Maintenance of Effort: District’s combined fiscal effort per student (or aggregate local and state expenditures for free public education for the preceding fiscal year) was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year. (N.B., Maintenance of effort applies to local and state expenditures, not to Title I or other federal expenditures.) ESEA §§1120A; 9021</p>	<ul style="list-style-type: none"> ▪ <i>Federal grant assurances document (on file with ESE)</i> ▪ <i>Maintenance of effort records (on file with ESE)</i>
<p>1-B Comparability of Services: District has and follows a written comparability reporting procedure. District’s comparability demonstration is prepared annually and demonstrates that services provided through state and local funds in Title I schools are comparable to those provided in non-Title I schools. When all schools are Title I schools, comparability demonstration shows that district uses state and local funds to provide services that, taken as a whole, are substantially comparable in each school. (N.B., Comparability of services applies to local and state funds, not to Title I or other federal funds.) ESEA §§1120A</p>	<ul style="list-style-type: none"> ▪ <i>Comparability procedure (Tab 1)</i> ▪ <i>Comparability demonstration (Tab 2)</i>
<p>1-C Supplement, Not Supplant: District demonstrates that it uses Title I funds only to augment the level of funds that would in the absence of Title I funds be made available from non-federal sources for the education of students participating in Title I programs. ESEA §§1120A; 1114~1116</p>	<ul style="list-style-type: none"> ▪ <i>Federal grant assurances document (on file with ESE)</i> ▪ <i>Supplement, not supplant policy and procedures (Tab 3)</i> ▪ <i>Comparability demonstration (Tab 2)</i> ▪ <i>Documentation of Title I expenditures (current and prior year) (Tab 4)</i>
<p>1-D Supplement, Not Supplant for Targeted Assistance Schools: District/school demonstrates that Title I funds have been used for the express purpose of serving those students who were identified as being in greatest need of Title I assistance based on student</p>	<ul style="list-style-type: none"> ▪ <i>Federal grant assurances document (on file with ESE)</i> ▪ <i>Supplement, not supplant policy and procedures</i>

Fiscal Procedures		
CRITERIA		EVIDENCE
	<p>selection criteria. ESEA §§1120A; 1114~1116</p>	<p>(Tab 3)</p> <ul style="list-style-type: none"> ▪ Title I targeted assistance program student selection criteria (Tab 19)
1-E	<p>Supplement, Not Supplant for Schoolwide Program Schools: District demonstrates that Title I funds in schoolwide program school(s) are in addition to total amount of funds that would, in the absence of Title I funds, be made available from state and local sources, including funds needed to provide services required by law for students with disabilities and students with limited English proficiency. ESEA §§1120A; 1114~1116</p>	<ul style="list-style-type: none"> ▪ Federal grant assurances document (on file with ESE) ▪ Supplement, not supplant policy and procedures (Tab 3) ▪ Comparability demonstration (Tab 2)
1-F	<p>Supplement, Not Supplant: District has developed, implemented, and disseminated written supplement, not supplant policy and procedures. Administrators and appropriate staff demonstrate clear understanding of policy and procedures. ESEA §§1120A; 1114~1116</p>	<ul style="list-style-type: none"> ▪ Federal grant assurances document (on file with ESE) ▪ Supplement, not supplant policy and procedures (Tab 3)
1-G	<p>Reservation of Funds: District reserves appropriate level of funds for:</p> <ol style="list-style-type: none"> 1. Family engagement 2. Children in institutions for neglected or delinquent children 3. Homeless children 4. Administrative services 5. Professional development 6. Preschool services 7. Indirect costs <p>ESEA §§1113; 1116; 1118</p>	<ul style="list-style-type: none"> ▪ Title I grant application (on file with ESE)
1-H	<p>Non-Public School Participants: District appropriately calculates and expends funds for equitable services to non-public school students, their teachers, and families. ESEA §§1120; 9306; GEPA §443</p>	<ul style="list-style-type: none"> ▪ Title I grant application (on file with ESE) ▪ Offer of consultation to eligible non-public schools (Tab 21) ▪ Affirmation of consultation with participating non-public school officials and description of services, if applicable (Tab 22)

Fiscal Procedures		
CRITERIA		EVIDENCE
		<ul style="list-style-type: none"> ▪ <i>Third-party contracts (Tab 23)</i>
1-I	<p>Single Audit: Districts expending \$750,000 or more annually in federal grant awards comply with single audit requirements (apart from districts taking program-specific audit exception). OMB Circular A-133</p>	<ul style="list-style-type: none"> ▪ <i>A-133 single audit reports (on file with ESE)</i> ▪ <i>District audit corrective action plans (if appropriate) and records (as requested)</i>

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Parent / Guardian Communications		
CRITERIA		EVIDENCE
2-A	<p>District notifies parents/guardians of school and district accountability status. Additionally, district publishes and distributes annual report cards for district and all district schools. ESEA §§1111-1112; §§1114-1118</p>	<ul style="list-style-type: none"> ▪ <i>Parent/guardian notification – report cards (Tab 8)</i>
2-B	<p>District creates and distributes written district parent/guardian involvement policies and school-parent compacts, and updates these policies and compacts periodically after evaluating their effectiveness.</p> <ul style="list-style-type: none"> • Parent/guardian involvement policies describe each served school’s approach, commitments, and services offered to parents of Title I students (all students, in schoolwide programs). Policies describe specific rights of parents and what information and meaningful activities are offered to parents so that they are well prepared to participate in their children’s educational growth. • School-parent compacts are agreements between the school (teachers) and the home (parents/guardians) that describe the responsibilities of each party, including the student, if desired. <p>ESEA §§1111-1112; §§1114-1118</p>	<ul style="list-style-type: none"> ▪ <i>District and school parent/guardian involvement policies (Tab 5)</i> ▪ <i>School-parent/guardian compact (Tab 6)</i>
2-C	<p>Schools conduct meetings at least annually to inform participating parents/guardians about Title I programs. District and its schools provide materials and training to Title I parents to help them understand such things as:</p> <ul style="list-style-type: none"> • The state’s academic content standards and state student academic achievement standards; • State and local academic assessments, including alternative assessments; • The parental involvement requirements of section 1118; and 	<ul style="list-style-type: none"> ▪ <i>Documentation of parent/guardian outreach and involvement (Tab 7)</i>

Parent / Guardian Communications	
CRITERIA	EVIDENCE
<ul style="list-style-type: none"> How to monitor their child’s progress and work with educators to improve the achievement of their child. <p>Additionally, districts and schools provide materials and training to help parents work with their children to improve their children’s achievement.</p> <p>ESEA §§1111-1112; §§1114-1118</p>	

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Program Design and Evaluation	
CRITERIA	EVIDENCE
<p>3-A District conducts annual needs assessment for each Title I school (both schoolwide and targeted assistance programs) that includes data on achievement of children in relation to state academic content and achievement standards and input from parents and school and district staff. Needs assessment is used to determine type of programs and services to be provided to eligible students.</p> <p>ESEA §§1114~1115</p>	<ul style="list-style-type: none"> Documentation of parent/guardian outreach and involvement (Tab 7) Needs assessment procedure (Tab 10)
<p>3-B District submits annual Title I grant application (“plan”) and any necessary amendments to plan.</p> <p>ESEA §§1112; 1114~1116</p>	<ul style="list-style-type: none"> Title I grant application and amendments (on file with ESE)
<p>3-C District evaluates Title I plan at least on an annual basis and makes necessary revisions to reflect substantial changes in direction of Title I program(s). Evaluation reflects accountability data for district and all Title I schools.</p> <p>ESEA §§1112; 1114~1116</p>	<ul style="list-style-type: none"> Program evaluation procedure (Tab 11) Program evaluation summary, including non-public school service, if any (Tab 12) Accountability data (on file with ESE)
<p>3-D Schoolwide Programs: If applicable, district develops comprehensive schoolwide program plans with involvement of community, individuals to be served, and relevant staff. Schoolwide plans are evaluated annually and must:</p> <ol style="list-style-type: none"> Identify reform strategies, aligned with the needs assessment, that are research-based and provide opportunities for all children to meet the state’s proficient or advanced levels of academic achievement; Provide instruction by highly qualified teachers; Offer high-quality, ongoing professional development; Create strategies to attract highly qualified teachers; 	<ul style="list-style-type: none"> Schoolwide program plans (Tab 14)

Program Design and Evaluation		
CRITERIA		EVIDENCE
	<ol style="list-style-type: none"> 5. Create strategies to increase parental involvement; 6. Develop plans to assist preschool students through the transition from early childhood programs to local elementary school programs; 7. Identify measures to include teachers in decisions regarding the use of academic assessments; 8. Conduct activities to ensure that students who experience difficulty attaining proficiency receive effective, timely, additional assistance; 9. Coordinate and integrate federal, state and local services and programs; 10. Meet intent and purposes of each program whose funds are consolidated, if applicable. <p>Moreover, schoolwide plans must indicate how schools in districts that are not reserving funds under Title I for homeless students are providing for appropriate services in schoolwide programs. ESEA §§1112; 1114</p>	
3-E	<p>Targeted Assistance Programs: District develops targeted assistance program plans that are coordinated with and support regular education program(s) in relevant schools. Title I staff must be integrated with regular instructional staff in all activities, and targeted assistance programs must:</p> <ol style="list-style-type: none"> 1. Use effective instructional methods and strategies that strengthen the core academic program of the school; 2. Use multiple, educationally related, objective criteria to identify children failing, or most at risk of failing, to meet the state's academic achievement standards (children in grades PK-2 selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures); 3. Give primary consideration to providing extended learning time for served students; 4. Provide an accelerated, high-quality curriculum; 5. Minimize the removal of children from the regular classroom during regular school hours. <p>ESEA §1115</p>	<ul style="list-style-type: none"> ▪ <i>Title I grant application (on file with ESE)</i> ▪ <i>Title I targeted assistance program student selection criteria (Tab 19)</i> ▪ <i>Rank-ordered student selection list of Title I students in targeted assistance program (Tab 20)</i>
3-F	<p>Accountability related required actions – levels 2-5:</p> <ul style="list-style-type: none"> • Districts classified into levels 2-5 reserve and expend the required portion of the district's Title I, Part A allocation to be spent on additional interventions and supports that address the needs of the district's lowest-achieving students. • The impact of activities is monitored for intended impact on student achievement. 	<ul style="list-style-type: none"> ▪ <i>Title I grant application (on file with ESE)</i> ▪ <i>Accountability data (on file with ESE)</i> ▪ <i>Title I data collection (on file with ESE)</i> ▪ <i>Supporting documentation as requested (tab 15)</i>

Program Design and Evaluation	
CRITERIA	EVIDENCE
<ul style="list-style-type: none"> Investments that are not achieving intended outcomes are discontinued. School Improvement Plans are revised as required. <p>Massachusetts' Request for ESEA Flexibility</p>	

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Data Collection and Management	
CRITERIA	EVIDENCE
<p>4-A</p> <p>All paraprofessional staff providing Title I services meet paraprofessional requirements in compliance with Title II-A requirements. MGL Ch. 71, §38G; ESEA §1119</p>	<ul style="list-style-type: none"> EPIMS data
<p>4-B</p> <p>Time and Effort: District maintains time and effort records for all Title I staff documenting time spent on Title I activities. <i>Full-time staff</i> funded solely by Title I grant sign semi-annual certifications that they have been working solely in activities supported by Title I grant for indicated period. <i>Split-time staff</i> funded partly by Title I grant document time spent on Title I and other activities. <i>Staff receiving stipends</i> through the Title I grant document amount paid and hours worked on Title I activities. Alternatively, <i>split-time staff</i> who maintain a consistent work schedule may sign semi-annual certifications. Time and effort records account for total time for which employee is compensated. OMB Circular A-87; OMB Circular A-133 Compliance Supplement</p>	<ul style="list-style-type: none"> Title I personnel lists (Tab 16) Time and effort records (Tab 17)
<p>4-C</p> <p>Selection and Allocation: District appropriately allocates funds to eligible school attendance areas or schools in rank order of poverty based on number of children from low-income families residing in an eligible attendance area. ESEA §§1113; 1116; 1118</p>	<ul style="list-style-type: none"> Title I grant application (school funding worksheet) (on file with ESE) SIMS data (on file with ESE) Directory administration data (on file with ESE)

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Opportunity and Equal Educational Access		
CRITERIA		EVIDENCE
5-A	<p>All Students: District identifies as eligible for Title I services students with disabilities, English language learners, and homeless students using the same basis as other students selected to receive services. District ensures that all students have equal opportunity to be selected to receive services. ESEA §1115</p>	<ul style="list-style-type: none"> ▪ <i>Title I targeted assistance program student selection criteria (Tab 19)</i> ▪ <i>Rank-ordered student selection list of Title I students in targeted assistance program (Tab 20)</i>
5-B	<p>Non-Public School Outreach and Programming: District consults with appropriate non-public school officials regarding services for eligible non-public school children, maintains written affirmation of consultation, provides equitable services, and evaluates Title I program serving eligible non-public school students. ESEA §§1120; 9306; GEPA §443</p>	<ul style="list-style-type: none"> ▪ <i>Offer of consultation to eligible non-public schools (Tab 21)</i> ▪ <i>Affirmation of consultation with participating non-public school officials and description of services, if applicable (Tab 22)</i> ▪ <i>Third-party contracts, if applicable (Tab 23)</i>
5-C	<p>Services for Neglected or Delinquent Children: District consults with appropriate officials from neglected/delinquent (N/D) facilities regarding services for eligible children and establishes formal agreement(s) with N/D facilities, where appropriate, to deliver educational programs in local facilities that are comparable to programs in schools students would otherwise attend. Neglected/delinquent application is complete and meets all requirements. ESEA §§1423;1425</p>	<ul style="list-style-type: none"> ▪ <i>Title I grant application (on file with ESE)</i> ▪ <i>Neglected or delinquent (N/D) facility coordination, if applicable (Tab 24)</i> ▪ <i>Neglected or delinquent (N/D) facility application, if applicable (on file with ESE)</i>