FY21 ESEA Consolidated Application
Title I-A
K-12 Systems and Supports
Welcome and Introductions
I. Welcome and Introductions

II. Agenda

III. Overview: ESEA Title I-A

IV. Title I-A: Grant Administration

V. Title I-A: Program Requirements

VI. Resources
The Every Student Succeeds Act (ESSA) was signed into law in December 2015, amending the Elementary and Secondary Education Act (ESEA).

**PURPOSE:** The intent of ESSA is to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education.

**TITLE I:** Improving The Academic Achievement Of The Disadvantaged  
**Part A:** Improving Basic Programs Operated by Local Education Agencies
Title I, Part A – Allocation Calculation

\[
\text{Total \# of low-income students residing in DC} \div \text{\# of enrolled low-income students} = X \text{ TOTAL ALLOCATION}
\]
Title I, Part A – Allocation Calculation

The calculation:

• **Share of students living in poverty** is calculated using (1) the prior year audited enrollment, (2) the New or Significantly Expanding Public Charter School (NOSEPCS) enrollment estimates for the allocation year, and (3) the prior year meal statuses of enrolled students.

• **NOSEPCS data submitted for the prior year’s allocation is compared to actual enrollment** in that year to determine the accuracy of estimates, then any over- or under-estimation is balanced in the current year’s allocation.

• **LEAs that “take over” another LEA or school do not see the “actual” increase in allocation until the second year of expansion.** (The first year is based on NOSEPCS.) The same is true for LEAs experiencing a drop in enrollment from year to year.
New LEAs

- Allocations are calculated using their estimated first year enrollment (NOSEPCS) and the average poverty rate of all LEAs in the District in the prior year.
- In their second year, new LEAs may be ineligible for a Title I allocation.

Fluctuations of individual LEA allocations year to year:

- The enrollment or poverty rate changes at the LEA or other LEAs.
- Increases and decreases in the District’s state-level allocation.
- Reallocations from other LEAs.
Title I-A: Grant Administration
## Grant Administration Requirements

### Qualifying for Funds
- K-12 LEAs
- Signed Phase I assurances
- Approved Phase II consolidated application

### Rules & Regulations
- **ESSA**
- **Education Department General Administrative Regulations**
- Uniform Grants Guidance *(UGG)*, 2 CFR Part 200
- **District of Columbia School Reform Act**

### Monitoring
- **OSSE Risk-Based Monitoring System**
- **U.S. Department of Education Performance Review Process**
## Grant Administration Requirements

<table>
<thead>
<tr>
<th>Period</th>
<th>Dates</th>
</tr>
</thead>
</table>
| **Initial Grant Period**      | • July 1, 2020  -  First date of obligation  
                                • Sept. 30, 2021  –  Last date of obligation |
| **Reimbursement Period**      | • Oct. 1, 2020  –  First date to request  
                                • Dec. 1, 2021  –  Last date to request |
| **Closeout Period**           | • Dec. 12, 2021  –  First date to submit  
                                • Jan. 31 2022  –  Closeout reports due |
| **Tydings Period for Carryover** | • Oct. 1, 2021  –  Sept. 30, 2022 |
| **Typical Monitoring Period** | • Fall 2021  –  Spring 2022                |
# Title I-A: Financial Reporting for ESSA

## Maintenance of Effort (MOE)

- MOE requires subgrantees receiving federal funds to maintain a minimum floor of state/local funding for education from year to year
- The data collection tool calculates this for LEAs and reports it to OSSE

## Per Pupil Expenditures Report (PPE)

- PPE requires that LEAs publicly report the per-student spending by school
- The data is reported annually on the [DC School Report Card](#)
- The OSSE data collection for both MOE and PPE is due in the spring
Allowable Uses of Funds – Supplement Not Supplant (SNS)

• ESEA requires that federal funds “supplement and not supplant” public state and local funding for education.
• Most LEAs are required to demonstrate that they allocate state and local funds and LEA-level expenditures to each school in without taking Title I status into account

<table>
<thead>
<tr>
<th>Charter LEAs</th>
<th>DCPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The D.C. School Reform Act and federal Title I SNS guidance indicate that D.C. charter LEAs are not required to share their local funding methodology with OSSE</td>
<td>• Under ESSA, DCPS must annually submit to OSSE a Title I local funding distribution methodology that ensures the SNS rule is met</td>
</tr>
</tbody>
</table>
Title I, Part A – Uses of Funds

Upgrade the basic educational program

- Curriculum and instruction
- Technology
- Professional development
- Parent and family engagement
- Academic support for students
- Support for students experiencing homelessness
- Intervention programs
- School climate activities
- Counseling, behavioral health and mental health programs
- Access to advanced coursework and dual enrollment programs
- Student behavioral supports
- Teacher recruitment and retention
## Allowable Uses of Funds – Program Plan

<table>
<thead>
<tr>
<th>Schoolwide Programs</th>
<th>Targeted Assistance Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Expenditures aligned with the strategies articulated in the schoolwide plan to meet the needs identified in the comprehensive needs assessment</td>
<td>• Expenditures for services described in the approved application</td>
</tr>
<tr>
<td></td>
<td>• Uses of funds must be aligned with the program plan and planned budget</td>
</tr>
</tbody>
</table>
## Allowable Uses of Funds - Application

<table>
<thead>
<tr>
<th>Necessary and Reasonable</th>
<th>Allocable</th>
</tr>
</thead>
<tbody>
<tr>
<td>• The expenditure costs are clear to an objective observer</td>
<td>• The grant must benefit from the cost in proportion to the amount paid by the grant</td>
</tr>
<tr>
<td>• Expenditures are made in accordance with federal and District laws and regulations and the terms and conditions of the federal award</td>
<td>• Salary and benefit costs must benefit the program in proportion to the amount paid</td>
</tr>
<tr>
<td>• Expenses pay a fair market price for the goods or services</td>
<td></td>
</tr>
<tr>
<td>• Established practices and policies of the LEA for procurement are followed</td>
<td></td>
</tr>
</tbody>
</table>
Allowable Uses of Funds - Reimbursement

<table>
<thead>
<tr>
<th>Adequately Documented</th>
<th>Consistent with the Application</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Sufficient evidence of expenditures to trace how the funds were spent</td>
<td></td>
</tr>
<tr>
<td>• Invoices and receipts with proof of payment</td>
<td></td>
</tr>
<tr>
<td>• Contracts and invoices including scope of work, dates and rates</td>
<td></td>
</tr>
<tr>
<td>• Approved by OSSE</td>
<td></td>
</tr>
<tr>
<td>• Expenditures must be aligned with program plan and anticipated budget</td>
<td></td>
</tr>
<tr>
<td>• If needed, the uses of funds in the application may be amended for a new approval</td>
<td></td>
</tr>
</tbody>
</table>
Title I-A: Program Requirements
Title I, Part A: LEA Activities

Equitable Access to Highly-qualified Teachers

• Participate in the OSSE teacher and staff data collection
• If identified as having a gap between schools, follow the process to submit a plan to OSSE

Early Childhood Coordination with Head Start Agencies (PK3-K)

• Sign and perform the activities in the city-wide memorandum of agreement with Head Start agencies
• Attend coordination meetings and joint trainings
Title I, Part A: LEA Activities

Parent and Family Engagement

• Written LEA-level policy
• Guidance for school-level policies and involvement
• the policy annually
• Notify parents of the right to know the professional qualifications of their students’ teachers

English Learners

• Administer Home Language Surveys
• Notify parents of student identified for English learners (ELs) services on time and with compliance
• Conduct outreach to parents of ELs to participate in their child’s education
• Hold meetings with parents of ELs to provide feedback on the program
Title I, Part A: School Activities

Parent and Family Engagement

- Written school-level parent and family engagement policy
- Conduct annual Title I meetings
- Involve parents in the development of the Title I program plan
- Provide required school academic information to parents
- Inform parents of their children’s PARCC scores
- Give notice to parents if their child is being taught by teachers that do not meet certification and licensure requirements
- Conduct outreach to parents of English learners (ELs)
- Hold meetings with parents of ELs

Required for DCPS, Optional for Charter LEAs

- School-Parent Compacts
- Capacity building for schools
Title I, Part A: LEA Plan

In order to receive Title I funds, LEAs must have an approved LEA plan on file with OSSE regarding, among other components, the following:

- How student progress is monitored
- Identification of and response to achievement gaps
- Services for students experiencing homelessness
- Services for students in the foster care system
- Strategies for effective parent and family engagement
- Coordination with early childhood programs
- Effective transitions for secondary school students
- Efforts to reduce the use of discipline practices
- Career and technical education programs
## Title I Program Models

### Schoolwide Program Model
- Any school with at least 40 percent poverty, unless given a waiver by OSSE
- Programs and services must be provided to all students in the school

### Targeted Assistance Model
- Programs and services must be provided to students who:
  - Are failing, or at risk of failing, to meet state standards;
  - Participated in certain federally funded preschool programs;
  - Are in a local institution for neglected or delinquent children or are attending a community day program; or
  - Are experiencing homelessness
# Title I-A – Stakeholder Engagement

## Parent and Family Engagement Policy
- Alternative and transitional education providers
- Charter school leaders or LEA staff
- Community partners
- Early childhood education programs
- Institutions of higher education
- Teachers and paraprofessionals
- Parents and family
- Principals
- School administrators
- Instructional support personnel

## LEA Plan
- Teachers
- Principals
- Other school leaders
- Paraprofessionals
- Specialized instructional support personnel
- Charter school leaders
- School administrators
- Other appropriate school personnel
- Parents/family members

## Schoolwide Program
- Teachers
- Principals
- Other school leaders
- Paraprofessionals
- School administrators
- Instructional support personnel
- Technical assistance providers
- School staff
- Parents and family
- Community partners
LEAs may transfer all or a portion of their Title II and Title IV allocations to another fund.

**FROM:**
- Title II-A
- Title IV-A

**TO:**
- Title I-A
- Title II-A
- Title III-A
- Title IV-A

**Key requirements of transferability:**
- Transferred amounts become funds of the program to which they are transferred and are subject to all the rules and requirements of the new program.
- DCPS must consult with private school officials if DCPS transfers funds from a program that includes equitable services.
Financial Flexibilities: Consolidating Funds

LEAs may consolidate all or a portion of their Title II, Title III, and Title IV allocations into a consolidated Title I schoolwide program pool of funds.

**FROM:**
- Title II-A
- Title III-A
- Title IV-A

**TO:**
- Consolidated Schoolwide Program

**Key requirements of consolidation:**
- Consolidated funds lose their identity and are subject to all the rules and requirements of the Title I program.
- Consolidated programs must meet the intents and purposes of the individual Titles that were consolidated.
Developing a Title I Program

Program Model: Schoolwide or Targeted Assistance

Program Plan: Group of strategies or services to achieve the Goal(s) of the program

Strategies/Services: Activities that have expected outcomes

Budget: Costs associated with the activities
Example: Schoolwide Program Plan

Program Model: Schoolwide

Needs Assessment Results = Teachers need more support, English Language Arts (ELA) PARCC scores are low

Goal: Raise ELA scores, increase learning time and increase student engagement

Program Plan: (1) Strengthen Instructional Practice  (2) Provide Intensive Reading Instruction
Example: Schoolwide Program Strategies

**Strengthen Instructional Practice**

1. Increase instructional coaching capacity; 2. Student data analysis training

**Outcomes**

Higher teacher satisfaction and improvement in skills to identify student needs

**Provide Intensive Reading Instruction**

1. Add learning software to current curriculum; 2. Use benchmark scores to personalize instruction

**Outcomes**

High use of software programs and higher rates of student engagement
Example: Schoolwide Program Budget

- **Strategies**
  - **Activities**
    - **Budget Line Items**
      - **Strengthen Instructional Practice**
        - 1. New instructional coaches; 2. PD contract with XYZ Software Inc.; 3. Data Days
      - **Salaries**: 1.5 instruction coaches and **Professional Services**: 1 training and 3 webinars
      - **Supplies**: 300 Student Licenses, 25 teacher licenses and 300 tests
      - **Provide Intensive Reading Instruction**
        - 1. XYZ licenses; 2. XYZ teacher licenses; 3. Benchmark tests
Common Monitoring Findings

The most common findings or areas of improvement for LEAs in the Risk Based Monitoring System 2019-2020 cycle and were related to the following:

1. Documentation of procurement policies and procedures
2. Time and effort certification
3. Parent and family engagement policies and activities
4. Documentation of stakeholder engagement
## Procurement Policies and Procedures

<table>
<thead>
<tr>
<th>ALL LEAs</th>
<th>DCPS</th>
<th>PCS</th>
</tr>
</thead>
<tbody>
<tr>
<td>• <strong>Education Department General Administrative Regulations (EDGAR)</strong>&lt;br&gt;• <strong>Uniform Grants Guidance (UGG)</strong></td>
<td>• <strong>District of Columbia Municipal Regulations (DCMR)</strong></td>
<td>• <strong>District of Columbia Public Charter School Board Procurement Contract Submission Policy (PCSB)</strong></td>
</tr>
</tbody>
</table>
Time and Effort Certifications

For all personnel expenditures, LEAs should collect and maintain time and effort certifications.

**Time and Effort Certifications must:**

- Include the name, title, and grant role (cost objective) of the employee or contractor;
- Be dated to align with the grant period;
- Be signed by the employee and dated after the fact;
- Match payroll records; and
- Account for total activity (100% of time)

**Time and Effort Certifications should:**

- Be validated with a supervisor’s signature; and
- Be completed quarterly, at a minimum, for personnel that meet multiple cost objectives.

**Time and Effort Certifications may:**

- Follow a semi-annual report pattern for single cost objectives; and
- Be signed electronically within a secure system.
Parent and Family Engagement Policies and Activities

- Differentiate between LEA-level vs school-level policies and activities
- Create a system that tracks parent notifications, meetings, and outreach activities
- Document translation and interpretation activities provided to families
- Make sure some activities are based in the academic achievement of students
Documentation of Engagement

Types of documentation:

- Opinion survey results
- Meeting notes and presentations
- Decision memos
- Revised versions of policies
- Email conversations

Not all engagement is the same

- Large public meetings or meetings between organization leaders
- Teachers and staff may have representative meetings, or be surveyed, or responses may be incorporated into professional development activities
- Some engagement occurs with other education organizations and may be documented there
Next Steps

OSSE
Next Steps

1. Meet with appropriate academic and finance team members to determine Title I program model and the perform needs assessments or student identification processes

2. Conduct the required stakeholder engagement

3. Decide if financial flexibility is appropriate to meet needs

4. Prepare the LEA plan, the Title I program plan and ConApp budget for the application

5. Submit the application by Sept. 30, 2020 at 3 p.m.

6. Revise the returned application within two weeks of receiving comments (Oct. 1 – Dec. 31)

7. Receive final approval and begin requesting reimbursement for expenditures (after Oct. 1)
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Resources

- ESEA – Law
- OSSE - Consolidated Application Webpage
- OSSE - ESSA Guidance for LEAs Webpage
- OSSE - English Learner Policy and Programs
Appendix
Title I Schoolwide Program Plans

• LEAs must conduct a comprehensive needs assessment to inform the schoolwide plan

• The schoolwide program plan must include descriptions of:
  1. How the school will improve academic achievement throughout the school, but particularly for the lowest-achieving students, by addressing the needs identified in the comprehensive needs assessment;
  2. How the strategies in the plan will provide opportunities and address the learning needs of all students in the school, particularly the needs of the lowest-achieving students;
  3. How the methods and instructional strategies that the school intends to use will strengthen the academic program in the school, increase the amount and quality of learning time, and help provide an enriched and accelerated curriculum, including programs and activities necessary to provide a well-rounded education; and
  4. Benchmarks for the evaluation of program results. This plan may be integrated into an existing improvement plan.

• LEAs must annually evaluate the plan and revise it based on the evaluation results

• Additional requirements for the plan may be found in ESEA Section 1114(b)
Title I Targeted Assistance Program Plans

- A targeted assistance model uses Title I funds to help only identified students
- Components of a targeted assistance plan include:
  - Description of how students are identified;
  - Description of programs, activities and academic courses that will serve identified students;
  - Description of instructional strategies and methods that may be used;
  - Coordination with regular education program;
  - Possible professional development for school educators;
  - Strategies to engage families; and
  - Other requirements in ESEA Section 1115(b).
- Students are eligible for Title I services in a targeted assistance school if they:
  1. Are failing, or at risk of failing, to meet state standards;
  2. Participated in certain federally-funded preschool programs;
  3. Received services under the Migrant Education Program;
  4. Are in a local institution for neglected or delinquent children or are attending a community day program; or
  5. Are experiencing homelessness