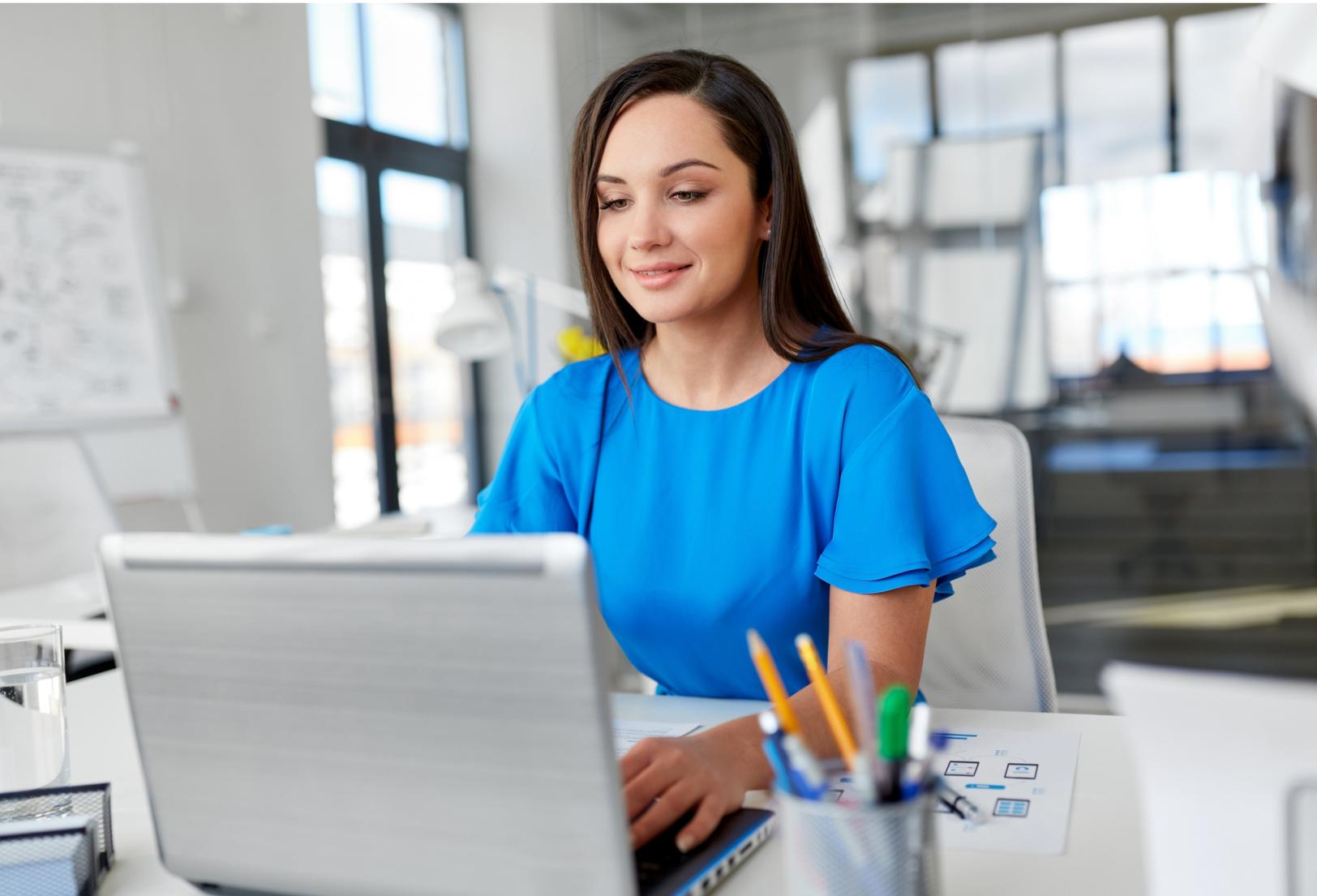




A GUIDE TO TITLE I EDUCATION COMPLIANCE

White Paper



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A Guide to Title I Education Compliance

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1.0 Overview

1.1 Purpose

This guide is intended to provide school districts and charter schools with knowledge and guidance on Title I, Part A and its requirements. This guide gathers and tries to simplify the information currently available to the public regarding federal and state statutes.

Unless stated otherwise, this guide is based on the Elementary and Secondary Education Act (ESEA) as amended by Every Student Succeeds Act (ESSA).

Should you require professional development in this area, 806 Technologies provides a full suite of training options for schools to take advantage of, including virtual sessions, workshops, onsite sessions, and more.

1.2 Basic Information about Title I, Part A

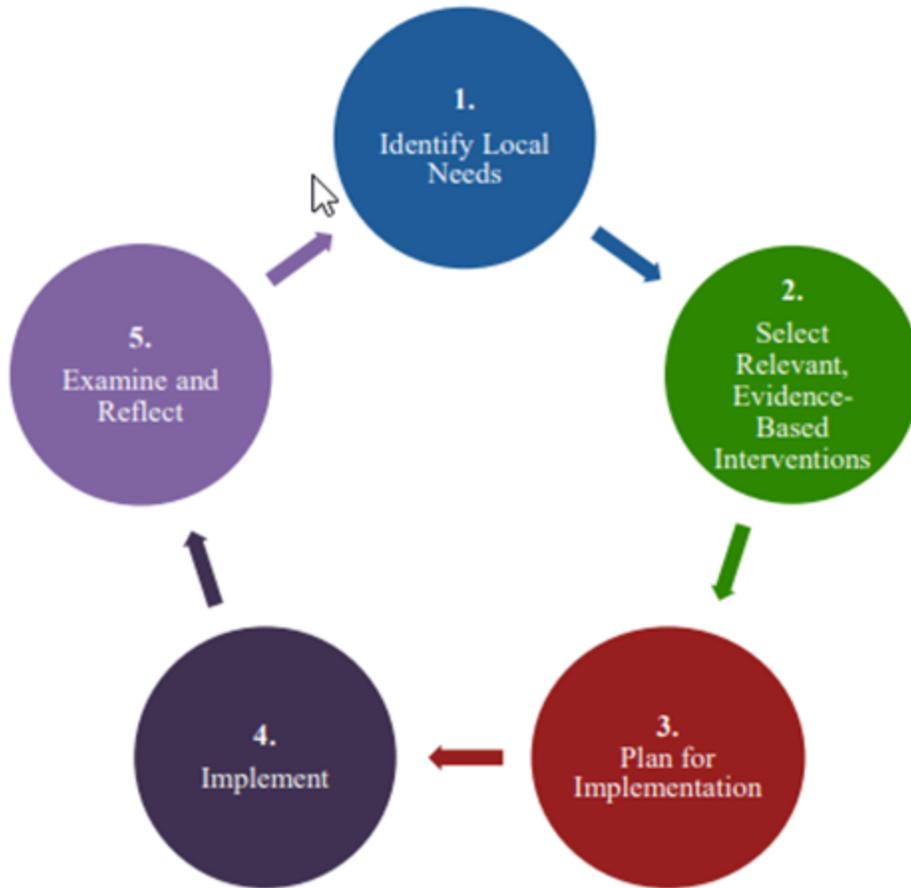
Title I, Part A is a funding award provided by the Elementary and Secondary Education Act (ESEA). The statute originated in 1965. It was most recently amended in December 2015 by the Every Student Succeeds Act (ESSA).

Title I, Part A is meant to provide a “fair, equitable and high quality education” to all students and “close educational achievement gaps.” The intent is to provide financial assistance to those K-12 students most in need of academic support regardless of economic status.

The ESEA requires certain activities and accountability in order for a school to receive this award through the state. The amount of funding is generally determined based on the number of children in poverty. In some states, this number correlates with the number of free and reduced price (FRP) students per district. The school then must choose to accept the funds and submit an application on how those funds will be used (in compliance with Title I, Part A requirements).

1.3 Continuous Improvement

In order to access Title I, Part A funds, school districts must regularly review and revise their program models. The U.S. Department of Education provided guidelines for meeting this requirement when they released *Using Evidence to Strengthen Education Investments* in 2016. This guide outlines a circular framework for continuous improvement.



1.3.1 Identify Local Needs

The school and/or district should engage with a variety of stakeholders to review relevant data and identify the most urgent needs for students, schools, and/or educators.

Stakeholders include but are not limited to families, students, educators, community partners, etc.

In this stage, the school and/or district must also identify potential root causes to the most urgent needs named.

1.3.2 Plan

The school and/or district must create a thorough implementation plan. The plan should include:

- Specific, measurable goals
- Clear, defined roles and responsibilities
- Timelines for successful implementation
- Resources needed for successful implementation

- Strategies to monitor and check progress (e.g. an approach for collecting data, analyzing data, and evaluating data)

1.3.3 Implement

With a solid plan in place, the school and/or district will have a tool for measuring their progress.

In this stage, a school and/or district should periodically review progress and address concerns/challenges as they occur.

1.3.4 Examine & Reflect

In order to continually improve Title I, Part A funded activities, the school and/or district must engage in regular data review and consultation. Data should be continuously collected and analyzed for successful performance monitoring.

In this stage, stakeholders should evaluate if goals and milestones are being met or if approaches need to be improved.

A determination of the effectiveness of the plan will determine next steps in identifying local needs.

1.4 Compliance Items

Compliance areas as well as each of their subsections may include:

1. LEA Program Development
 - a. Review and revision of Title I, Part A plan.
 - b. Develop and implement a well-rounded program of instruction.
 - c. Identify students who may be at risk for academic failure.
 - d. Provide additional assistance to identified students.
 - e. Identify strategies to strengthen the academic programs.
 - f. Coordination and integrate services with early childhood education programs to facilitate transition to elementary school.
 - g. Effective transitions for students from middle grades to high school and from high school to postsecondary education.
2. Targeted Assistance (TA) Program
 - a. Selection of students
 - b. Additional instruction
 - c. Coordination of services
3. Schoolwide Program (SWP)
 - a. Comprehensive plan for school improvement
 - b. Implementation
 - c. Annual evaluation
4. Preschool Program
 - a. Eligibility and selection of students

- b. Child screenings and assessments
 - c. Education program
5. Equitable participation of nonpublic schools
 - a. Consultation and agreement
 - b. Eligibility and selection of students
 - c. Equitable student interaction
 - d. Parent and family engagement
 - e. LEA maintains control of all funds and equipment
6. Parent and Family Engagement
 - a. District and school family engagement policies
 - b. Home/school compacts
 - c. Parents' Right-to-Know notices
 - d. Informing parents and families of student's academic achievement
 - e. Involving families in program improvement
 - f. Shared responsibilities for individual student's achievement
 - g. Building capacity for family engagement
 - h. Full participation of all families
7. Specific Populations
 - a. Outreach and awareness of homeless students
 - b. Identification of homeless students
 - c. Transportation plan for students in foster care
 - d. School stability for students who are homeless or in foster care
 - e. Full participation of homeless students
8. Staff Qualifications
 - a. Teacher qualifications
 - b. Paraprofessional qualifications
 - c. Supervision of paraprofessionals
9. Financial Management
 - a. Personnel costs
 - b. Non-personnel costs
 - c. Asset management
 - d. Allowable costs
 - e. Equitable expenditures for nonpublic participants
 - f. Required set-asides

2.0 Program Plans

2.1 Targeted Assistance (TA) Program Plan

This plan is based on a needs assessment and aligns with the overall school plans. The plan must reflect the needs of the identified students and outlines the following:

- How students will be selected for the program

- How the program will be implemented (e.g. reading, math, etc.)

Targeted Assistance campuses are either ineligible for a schoolwide program or they have chosen not to operate a schoolwide program.

TA Plans serve a select number of students. Program costs include but are not limited to: staff salaries, materials, and supplies, PFE activities (for program students).

2.1.1 Eligibility

The school identifies students who are “at risk or not meeting the state’s challenging student academic achievement standards”. Selection is based on multiple, objective criteria set by the LEA. Selection is based solely on low-achievement, not low income.

2.1.2 Program Focus

- Supplemental services
- Based on comprehensive needs assessment (CNA)
- Evidence-based practices
- School and community engagement

2.2 Schoolwide Program (SWP) Plan

This plan is based on the comprehensive needs assessment (CNA) and the SWP requirements (i.e. components, elements).

If allowed by the SEA, an LEA may operate a SWP in the first year of collecting Title I, Part A funding to ensure that a year of planning took place. Generally speaking, schools must have a poverty level of at least 40% to operate an SWP Plan, unless they receive a waiver.

2.2.1 Eligibility

The school serves an eligible school attendance where 40% or more of students are from low-income families. Schools may be eligible for a waiver.

2.2.2 Program Focus

1. Accountability
2. Evidence-based practices
3. School and community engagement

2.3 Program Evaluation

Programs should be evaluated on an annual basis by examining the data used, stakeholders consulted, and methods used.

Data types analyzed include:

- Formative and summative student performance data
- Surveys
- Attendance data
- Other data from students, teachers, and administrators

Four primary questions should be asked during the evaluation:

1. Has the Title I, Part A program been effective?
2. What has worked well?
3. What has not worked well?
4. How should the program be refined?

3.0 Evidence-Based Practices

ESSA requires that states and LEAs implement plans and programs that have a proven record of accomplishment in improving student achievement. In order to execute this properly, evidence-based practices are needed.

The following materials are excellent resources for evidence-based practices:

1. [Using Evidence to Strengthen Education Investments](#) (Department of Education, 2016) - guidance on how to choose and implement interventions that improve outcomes for students
2. [Education Resources Information Center](#) (ERIC) - bibliographic records of journal articles and other education-related materials
3. [National Center for Education Statistics](#) (NCES) - primary federal entity for collecting and analyzing education data
4. [What Works Clearinghouse](#) - reports on the effectiveness of educational programs, products, practices, and policies
5. [Evidence for ESSA](#) - up-to-date, reliable information on programs that meet ESSA evidence standards

3.1 Documentation Guidelines

The ways in which a school and/or a district document their Title I, Part A funded activities is not restricted to a single, specific format. Documentation can be paper or electronic record, however electronic record has proven to be a much more secure and effective method.

Examples of documentation may include: agreements, approval of expenditures, assessment results, attendance records, meeting notes, reports, schedules, survey results, work activity reports, etc.

Documentation must be kept organized so that it can be easily referenced when needed, either by the school and/or district itself or by government agencies. Multiple activities can be recorded in the same piece of documentation.

In general, documentation should contain the following information:

- Date, time and location of activity or action
- Name of the district and/or school (preferably on school letterhead)
- Purpose of the activity or action
- Brief description of activity or action taken
- Result of activity or action (i.e. decision(s) made)
- Name(s) of participants and their role in the activity or action

[Title1Crate](#) web-based software is an ideal tool for collecting, tracking, and reviewing documentation as it automatically embeds much of this information into the tool as it is in use.

4.0 State Monitoring

If the school and/or district accepts Title I, Part A funds, the state must monitor, in accordance with federal regulations. This is to ensure compliance with program requirements and to help schools and districts meet their performance goals.

5.0 District Reviews

In accordance with the federal mandate, the state is responsible for monitoring their schools and districts. The state does this by conducting audits or reviews of compliance documentation and evidence. Verbal explanations are not sufficient for submission. They must be accompanied by paper or electronic documentation to prove compliance. Incomplete documentation may result in non-compliance status.

5.1 Full Site Review

A full site review is when the state reviews all applicable compliance areas and requirements.

Monitors may meet onsite with administrators, teachers, paraprofessionals, staff, and parents in addition to reviewing compliance documentation.

At the conclusion of a full site review, the school and/or district will receive preliminary results and be notified of areas that may still need attention.

5.2 Limited Site Review

A limited site review is when the state reviews a subsection of requirements within each applicable compliance area.

Monitors may meet onsite with district administrators and, if applicable, a representative of a nonpublic school in addition to reviewing compliance documentation.

At the conclusion of a limited site review, the school and/or district will receive preliminary results and be notified of areas that may still need attention.

5.3 Desk Review

Like a limited site review, a desk review is when the state reviews a subsection of requirements within each applicable compliance area. There is no onsite review. The school and/or district submits documentation for remote reviewing.

If significant deficiencies are identified in the review, a state may expand the scope of the review and conduct a follow-up.

At the conclusion of a desk review, the school and/or district will receive preliminary results and be notified of areas that may still need attention.

5.4 Final Results

Although time frames may vary from state to state, in general, a final report will be available for review within eight weeks of the preliminary results.

5.5 Corrective Action Plan

If the final results return findings of non-compliance, the school and/or district must take corrective action. A corrective action plan (CAP) addresses the action steps and timeframe for correcting the findings. Documentation on corrective action should be submitted as completed no later than one calendar year from the date of the findings. A finding of misappropriation of funds could result in requiring the LEA to return the federal funds to the SEA.

6.0 Tips for New Title I, Part A Directors

1. **Read your state's guide and/or handbook.**
2. **Review the most recent version of the following resources:**
 - Your LEA's Targeted Assistance (TA) or Schoolwide (SWP) Plans
 - Previously submitted Title I, Part A application
 - State required School Improvement Plan (SIP)
 - Other supporting materials, such as budget
 - Accountability reports

3. **Visit your Title I campuses often** and familiarize yourself with their TA/SWP Plans (if applicable) and their procedures for student selection, service delivery methods, and PFE policies.
4. **Visit any private schools participating in the Title I, Part A program** as well as any other institution/home receiving funds to familiarize yourself with the services being provided.
5. **Read your LEA's policies** on Parent and Family Engagement (PFE), data collection and use, professional development (PD), and the dissemination of annual notices to parents. (Annual notices may include: LEA/School PFE Policy, Parent Compacts, LEA/School Report Cards, Parents' Right-to-Know, etc.)
6. **Develop a calendar and a process for collecting information and data** throughout the year to ensure compliance and program quality. Our web-based software, [Title1Crate](#), has a built-in calendar and process to make data collection and deadline tracking easy.
7. **Refer to your state's Program Review monitoring checklist** as an organizational framework (if available). [Title1Crate](#) comes pre-loaded with your state's checklist for simple review and monitoring. (Title1Crate currently has 37 state crates.)
8. **Save the latest versions of your SWP and TA School program plans** and maintain an updated list of students served in each program. Make sure to include selection criteria, date of program entry, date of program exit, and reason for exit (e.g. academic exit, moved, dropped by parent request, etc.).
9. **Track program retention at the federal and state level.** Information must be kept up-to-date until the auditor's examination report is received OR for the period of time required by the grant/program - whichever is later.
10. **Retain records for a minimum period of six years back.** All federal and state program records and supporting documentation must be kept for the current fiscal year plus 5 years back, for a total of 6 years. If an LEA has a pending audit, the information must be retained until the audit is completed. [Title1Crate](#) maintains school records 7 years back.
11. **Participate in industry events.** Industry events include:
 - Regional Network Meetings at the ESDs (if applicable)
 - New Director Title I trainings and workshops offered by your Department of Education
 - [National ESEA Conference](#)
 - Institute of Educational Leadership's (IEL) [National Family and Community Engagement Conference](#)

- [National Association of Federal Education Program Administrators \(NAFEPA\)](#)

7.0 Resources

1. [Education for Homeless Children and Youths Program, March 2017](#)
2. [Early Learning in the Every Student Succeeds Act \(ESSA\), January 2017](#)
3. [Fiscal Changes and Equitable Services Requirements Under the ESEA, as amended by the ESSA, November 2016](#)
4. [Student Support and Academic Enrichment Grants, October 2016](#)
5. [Supporting School Reform by Leveraging Federal Funds in a Schoolwide Program, Sept. 2016](#)
6. [Using Evidence to Strengthen Education Investments, September 2016](#)
7. [Ensuring Educational Stability for Children in Foster Care, June 2016](#)

8.0 About 806 Technologies

In 2006, Lesli, an assistant superintendent, was stressing about the complicated regulations around federal and state improvement planning. Her son, Ross, wanted to help. After listening to her needs, he developed a software program to help her quickly manage these compliance responsibilities so that she could focus on innovative ways to help students learn. This software program became what we know today as [Plan4Learning](#). And 806 Technologies was born.

806 Technologies is an education software company dedicated to creating a world of innovative schools by streamlining administrative paperwork. 806 Technologies offers LEA administrators a full suite of software solutions, including [Plan4Learning](#), [Title1Crate](#), [CTE Crate](#), [SpEd Crate](#), and [Safety Crate](#). Our educators provide professional development on improvement/strategic planning and compliance documentation. Free up more time in your day so that you can get back to focusing on what matters most - your students.

We want to be your trusted partner for all your planning and compliance software needs. We're committed to seeing your LEA improve, your administrators succeed, and your students thrive. Contact us today at 877-331-6160 or sales@806technologies.com.

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