

Title I Equitable Services

MARYLAND STATE DEPARTMENT OF EDUCATION TITLE I COORDINATORS' MEETING

April 2010

TITLE I EQUITABLE SERVICES

We're #1!



TOPICS POSED



- **Timely and meaningful consultation**
- **MOUs versus Third Party Contracts/ Who is responsible for what**
- **How services are provided and by whom**
- **Documentation (how and when to generate the list of address and academically eligible students, making revisions to the program, etc.**
- **Compliance issues (using HQ teachers, acceptable purchases – instruction, parent involvement, administration), start and end of services**
- **Consulting with neighboring LEAs**

TIMELY AND MEANINGFUL CONSULTATION



When is consultation timely?

When is consultation meaningful?



It depends

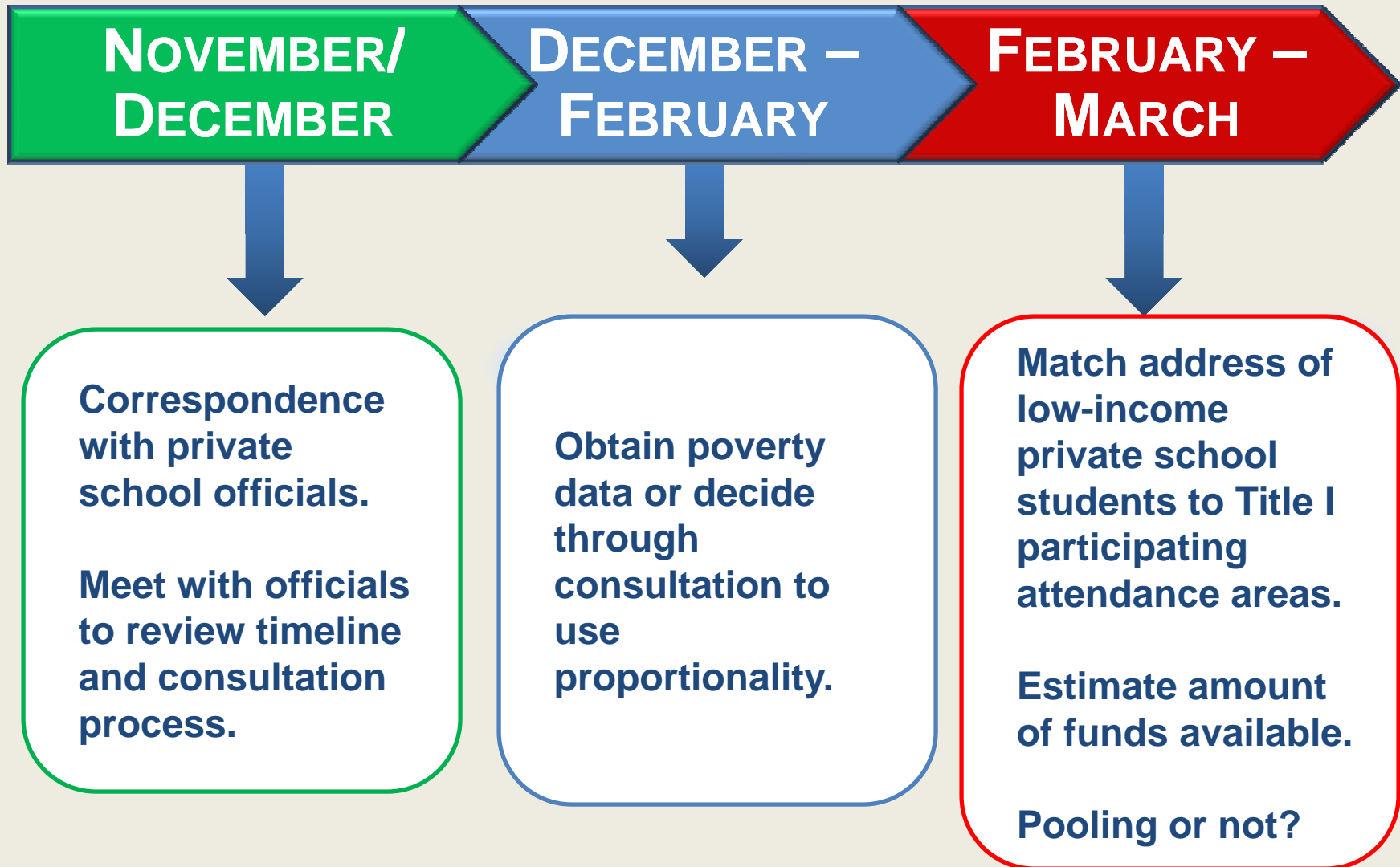
TIMELY CONSULTATION

At the time of the monitoring review (February), LEA staff discussed how the Title I ARRA funds are being used in the public schools. However, LEA staff had not yet discussed this information with private school officials.



FINDING

WHAT IS TIMELY CONSULTATION?



WHAT IS TIMELY CONSULTATION?



**MARCH –
APRIL**



Consult to determine selection criteria.

Obtain list of students who meet criteria.

Determine children most at risk.

Consult with officials to design services to meet participants' needs using estimated amounts for instruction, professional development and parent involvement.

Define annual progress for evaluation.

WHAT IS TIMELY CONSULTATION?

**APRIL –
JUNE**



Assess the achievement of current year's program using standards agreed to.

Share results with officials. Discuss whether/what modifications may need to be made to program.

Determination in consultation with officials the professional development and parent involvement needs of private school teachers and families of participants.

Design activities for private school teachers and families of participants.

Discuss tentative design of instructional, professional development and parental involvement activities.

WHAT IS TIMELY CONSULTATION?

**JUNE -
AUGUST**



Obtain written affirmation from officials.

Complete all contract negotiations, if needed.

Generate a list of students to be served.

Report on readiness of program.

MEANINGFUL CONSULTATION

LEA officials told private school officials that, since a contractor would be providing the Title I services, the LEA was required to use the contractor's test for evaluating the program.



FINDING

WHAT IS MEANINGFUL CONSULTATION?

ALL REQUIRED TOPICS DISCUSSED

HOW CHILDREN'S NEEDS WILL BE IDENTIFIED.

SELECTION CRITERIA.

SERVICES TO BE OFFERED.

HOW AND WHEN DECISIONS ABOUT DELIVERY OF SERVICES WILL BE MADE.

WHAT IS MEANINGFUL CONSULTATION?

ALL REQUIRED TOPICS DISCUSSED

METHOD AND SOURCE OF DATA THAT LEA WILL USE TO DETERMINE # OF LOW-INCOME CHILDREN.

HOW SERVICES ASSESSED AND IMPROVED.

SIZE AND SCOPE OF SERVICES.

CONTRACT?

WHAT IS MEANINGFUL CONSULTATION?

ALL REQUIRED TOPICS DISCUSSED

PROPORTION OF FUNDS ALLOCATED.

**PROFESSIONAL DEVELOPMENT ACTIVITIES
FOR CLASSROOM TEACHERS OF
PARTICIPANTS.**

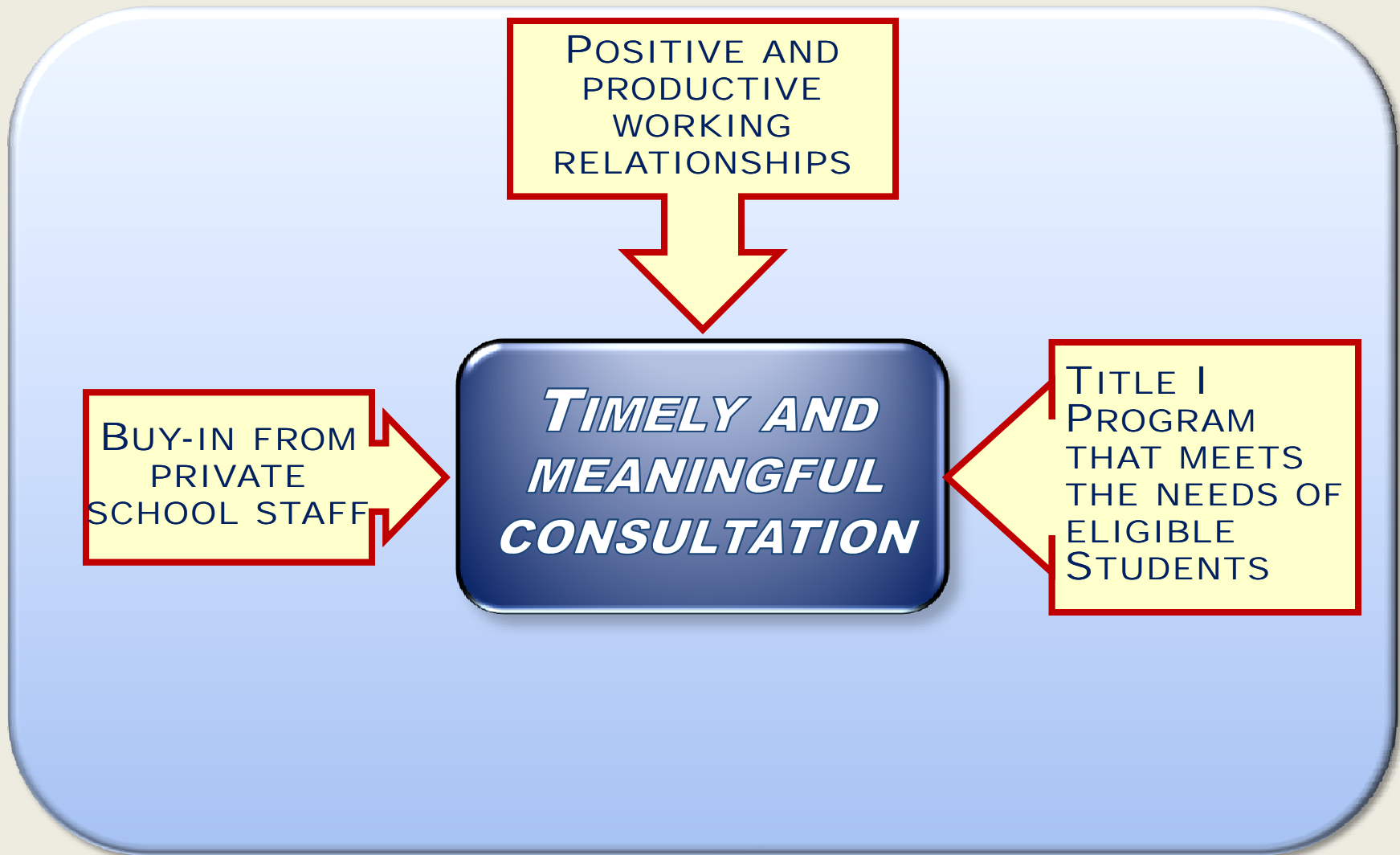
**ACTIVITIES FOR PARENTS OF
PARTICIPANTS.**

MEANINGFUL CONSULTATION



Genuine opportunity for all parties to express their views and to have those views heard.

CONSULTATION



MOU AND THIRD PARTY CONTRACTS

Who is responsible for what?



SERVING PRIVATE SCHOOL CHILDREN WHO ATTEND A PRIVATE SCHOOL IN ANOTHER LEA

Section 200.62(b)(1)(i) of the Title I regulations defines Title I eligible private school children as those who reside in participating public school attendance areas of the LEA, regardless of whether the private school they attend is located in the LEA. Thus, the LEA in which the child resides is responsible for providing services to the child, but it may arrange to have services provided by another LEA and reimburse that LEA for costs.

MEMORANDUM OF UNDERSTANDING (MOU)

ABC County may ask that **123 County** provide Title I services to eligible children who reside in **ABC County** but attend a private school in **123 County**.

ABC County and **123 County** *may* have an MOU that transfers all responsibilities of section 1120 providing equitable services to the **123 County**, the LEA providing the services.

MEMORANDUM OF UNDERSTANDING (MOU)

ABC County must transfer to **123 County** the amount of Title I funding generated by low-income children living in Title I participating school attendance in **ABC County** but attending a private school in **123 County**.

This would include per-pupil amounts from Title I schools' allocations as well as the proportionate share of applicable districtwide reservations.



MEMORANDUM OF UNDERSTANDING (MOU)

Responsibilities

ABC County - Must consult with private school officials about all topics that deal with the funding:

- How and when decisions about delivery of services will be made.
- Method and source of data that LEA will use to determine # of low-income children.
- Proportion of funds allocated.

MEMORANDUM OF UNDERSTANDING (MOU)

Responsibilities

123 County - Must consult with private school officials about all topics that deal with the services:

- How and when decisions about delivery of services will be made.
- How children's needs will be identified.
- Selection criteria.
- Services to be offered.

MEMORANDUM OF UNDERSTANDING (MOU)

Responsibilities

123 County - Must consult with private school officials about all topics that deal with the services:

- How services assessed and improved.
- Contract?
- Professional development activities for classroom teachers of participants.
- Activities for parents of participants.

THIRD-PARTY CONTRACTS

**Who is responsible for
what?**



It depends ...

THIRD-PARTY CONTRACTS

ESEA Requirements

Section 9306(a) of ESEA requires that :

- The program will be administered in accordance with all applicable statutes and regulations; and
- The subgrantee will maintain control of the program.

THIRD-PARTY CONTRACTS

GEPA Requirements

Section 443(a) of GEPA requires subrecipients to maintain records that fully disclose:

- How the funds were used;
- Total cost of the activity for which the funds were used; and
- Other records that will facilitate an effective audit.

THIRD-PARTY CONTRACTS

Ultimately, the LEA is responsible for ensuring that the Title I program is compliant.



THIRD-PARTY CONTRACTS

What are some findings that we have identified around contracts for Title I equitable services?

Findings



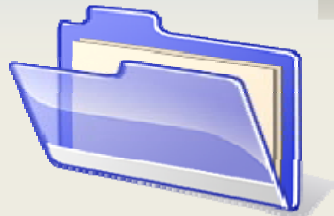
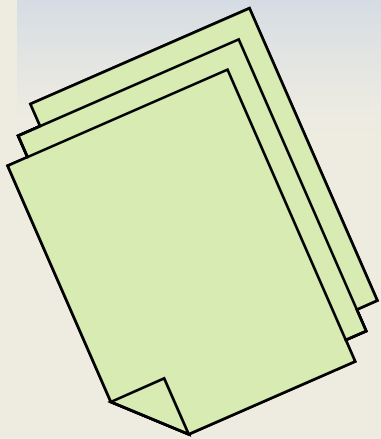
THIRD-PARTY CONTRACTS

- The contractor provided professional development activities through an on-line system. Private school teachers select activities in which they wish to participate.
- The contractor provided services to Title I children in the regular private school classrooms.
- The LEA used the contractor's evaluation because the contractor told the LEA that it must use it.

THIRD-PARTY CONTRACTS

- The contractor provided invoices that had not broken out administrative, instructional, professional development and family involvement costs.
- The contractor allowed private school teachers to use the equipment, materials and supplies purchased with Title I funds when the contractor was not using them.
- The LEA had done a sole source contract in violation of the State's procurement policies.

DOCUMENTATION THAT SHOULD BE MAINTAINED BY THE LEA



DOCUMENTATION

- List of addresses for low-income children generating funds.
- Low-income data from private schools.
- List of participating children.
- Documentation of eligibility.
- Back up evidence for invoices.
- Professional development and parent involvement activities.

DOCUMENTATION

- Inventory of equipment paid for by Title I.
- Agendas (Consultation).
- Affirmation forms.
- Evaluation.
- Anything else that is needed for an audit.

PROBLEMS WE HAVE ENCOUNTERED THIS YEAR ...

- No consultation before ARRA decisions made.
- Whiteboards purchased and installed in all private school classrooms.
- Title I funds used to purchase books for library.
- Title I funded software placed on computers owned by the private school.
- No evaluation – just pre and post tests.
- Team teaching in private school classrooms.

More
Info
This
Afternoon

FOR ADDITIONAL INFORMATION

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