



Title I Equitable Services – Findings and Fixes



April 2010

ALLOWABLE COSTS



Findings – Instructional Costs



Title I funds used for:

- Whiteboards for all private school classrooms.
- Software loaded on computers owned by private school.
- Computers. Private school staff used the computers with all children when not in use for Title I.
- Computers for the private school classrooms.
- Library books located in the library of the private school.

ALLOWABLE COSTS



Findings – Instructional Costs



Title I funds used for:

- LEA to hire a paraprofessional to provide Title I services.
- LEA to hire a CAI paraprofessional who does not provide instructional services.

ALLOWABLE COSTS



WHY?

Section 200.66(b)(2) of the Title I regulations prohibit LEAs from using Title I funds for the needs of the private school or the general needs of children in the private school.

Section 200.67(c)(1) of the Title I regulations requires that any Title I funded equipment or supplies placed in the private school are used for Title I purposes only.



ALLOWABLE COSTS

WHY?

Section 1120(d)(1) of the ESEA requires that the LEA maintain control of the Title I funds, materials, equipment and property.

ALLOWABLE COSTS



OMB Circular A-87 Test:



- Reasonable and Necessary
- Allocable
- Authorized

ALLOWABLE COSTS

➔ Fix it and going forward, sin no more



➔ Fix it, sin no more and make it right for all the equitable services that were not provided for _____ years.



ALLOWABLE COSTS

Note: Title I funds may not be used to correct a violation of Title I statute or regulation.



ALLOWABLE COSTS



Findings – Professional Development

Title I funds used for:

- Activities from an online menu. The menu included a variety of topics including math, reading, science, psychology, etc.
- Conferences sponsored by a religious organization and/or IRA, ASCD, NCTM, etc.
- Substitute teachers for private school classroom teachers attending professional development activities.
- Workshops on ADHD, IEPs, etc.

ALLOWABLE COSTS

WHY?

Section 200.66(b)(2) of the Title I regulations prohibit LEAs from using Title I funds for the needs of the private school or the general needs of children in the private school.

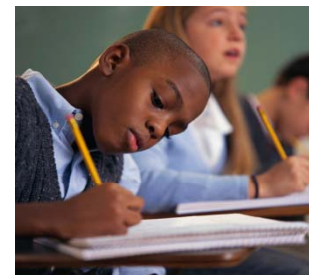
Consequently, the professional development activities for the private school teachers of participating students should address how those teachers can better meet the specific needs of Title I students.

EVALUATION



Findings – Evaluation

- No evaluation.
- Pre and post test.
- Using contractor's test because LEA is mandated by contractor to do so.
- Narrative analysis with no standard/benchmark.



EVALUATION

WHY?

Section 1120(b)(1)(D) of the ESEA requires that LEA officials consult with private school officials on how Title I services will be academically assessed and how the results of that assessment will be used to improve services.

EVALUATION

WHY?

During the consultation process, LEA and private school officials must discuss what assessment(s) will be used to measure the effectiveness of the Title I program and the achievement of Title I participants against agreed-upon standards.

Example: *At least 80 percent of the participants will score at the 50th percentile or better in total reading on the Terra Nova Test.*

CONTRACTS

Findings – Contracts

- Contract did not require the contractor to break out specific costs for administration, instruction, professional development and parental involvement.
- LEA did not monitor the contract.
- Contract provided the total amount for all Title I services.
- Contractor developed the professional development activities for the private school classroom teachers. No LEA approval process.
- LEA chose the contractor with the lowest bid for services.

CONTRACTS

WHY?

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.

CONTRACTS

WHY?

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.

Common Elements of Both the RFP and Contract

What should the LEA include in both the RFP and contract?

The LEA should include definitions and uses for:

- Instructional;
- Administrative;
- Professional development; and
- Parental involvement costs.



COMMON ELEMENTS OF BOTH THE RFP AND CONTRACT

{ Example }



INSTRUCTIONAL COSTS

For the purposes of this contract, instructional costs are defined as:

- Teacher and instructional aide salaries, including fringe benefits;
- Instructional materials, including such items as books, computers and software for student use, workbooks, and supplies.

COMMON ELEMENTS OF BOTH THE RFP AND CONTRACT

{ Example }

ADMINISTRATIVE COSTS



For the purposes of this contract, administrative costs are defined as:

- Costs the contractor incurs to administer the program, including but not limited to salaries and fringe benefits for the Director, assistants as needed, area supervisors, and support staff, office rent and utilities, office equipment and supplies, postage and mailings, telephone, travel, special capital expenses, escort time, professional development for Title I teachers and supervisors who are employees of the contractor, and the contractor's fee (profit).

COMMON ELEMENTS OF BOTH THE RFP AND CONTRACT



{ Example }

PROFESSIONAL DEVELOPMENT COSTS

For the purposes of this contract, professional development costs are defined as:

Costs the contractor incurs to provide professional development activities to private school teachers of participating private school children.

COMMON ELEMENTS OF BOTH THE RFP AND CONTRACT



{ Example }

PARENTAL INVOLVEMENT COSTS

For the purposes of this contract, parental involvement costs are defined as:

Costs the contractor incurs to provide parental involvement activities to parents of participating private school children.

COMMON ELEMENTS OF BOTH THE RFP AND CONTRACT

REPORT CARD				
GRADING PERIOD	1	2	3	4
READING	A			
WRITTEN COMMUNICATION	A			
MATHEMATICS	C			
SCIENCE/HEALTH	B			
SOCIAL STUDIES	B			
ART	A			
MUSIC	A			
PHYSICAL EDUCATION	C			
Grade Average	B			
Attendance:	Present	40		
	Absent	0		
	Tardy	1		
<small>A = Excellent • B = Good • C = Satisfactory • N = Needs Improvement U = Unsatisfactory • I = Insufficient / Incomplete</small>				
Student:	Grade:	Year:		



The LEA should provide the standards and assessment agreed to in consultation that the LEA will use to measure the effectiveness of the Title I program provided to private school children.

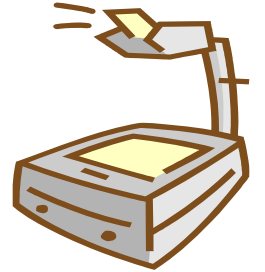


Common Elements of Both the RFP and Contract

Both should require:

- That invoices have separate categories for instructional, professional development, parental involvement, and administrative costs; and
- Sufficient documentation from the contractor prior to payment of the invoice.
- A description of the procedures for submission of invoices by the contractor including how often they are to be submitted.

COMMON ELEMENTS OF BOTH THE RFP AND CONTRACT



Statements that should be in both:

- All equipment purchased with Title I funds is the property of the LEA, not the contractor;
- The contractor will comply with all Title I statutory and regulatory requirements;
- The LEA has the right to withhold payment if any requirement is not met.



COMMON ELEMENTS OF BOTH THE RFP AND CONTRACT

- The LEA will inform the contractor by _____ the amount of funds available for all activities (instruction, professional development, and family involvement);
- The contract may be modified if there is a reauthorization of the ESEA during the performance period of the contract; and
- Clauses that address GEPA and ESEA requirements.

COMMON ELEMENTS OF BOTH THE RFP AND CONTRACT

Both should provide information on LEA oversight:

Examples

- Monthly unannounced visits;
- Monthly or bimonthly reports by school of activities for children's services, professional development and family involvement activities; and
- Requests for more documentation to support invoices.



COMMON ELEMENTS OF BOTH THE RFP AND CONTRACT

Both should contain a list of all deliverables with due dates.

By the
15th of
each
month



CONTRACT

The contract should contain:

- RFP
- The bidder's proposal with all changes required by the LEA
- Other sections as required by the LEA contract office

Types of Contracts

- ▶ **Cost Reimbursement** – LEA will reimburse the third-party for costs incurred as part of providing the services (e.g. salaries of teachers, materials and supplies, etc.)
- ▶ **Fixed Price Plus Fee** – LEA is charged a specific amount to provide services (E.g. \$150,000 to provide services to 175 children).



Further Clarification

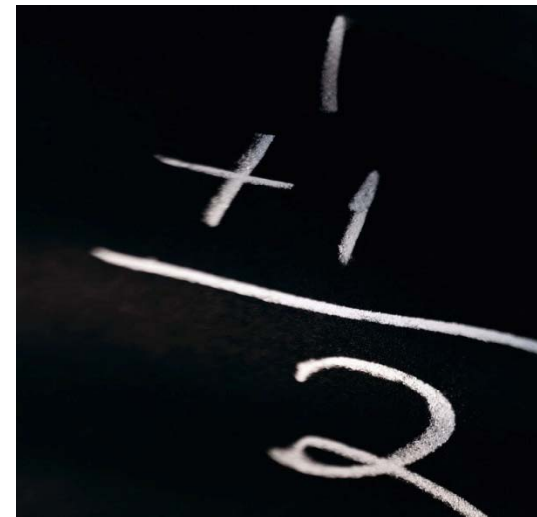


Whichever type, the contract must reflect that the contractor is required to provide information about:

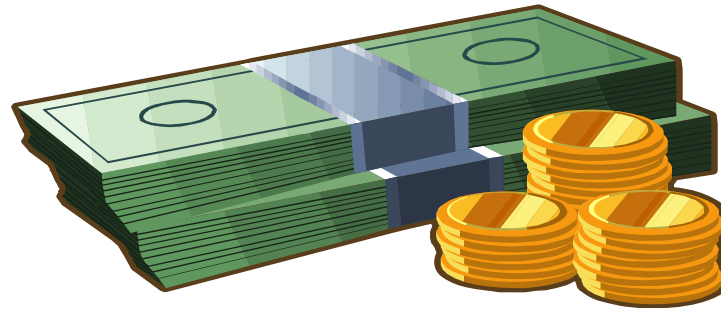
- ✓ How the funds were used;
- ✓ Total cost of the activity for which the funds were used; and
- ✓ Other records as will facilitate an effective audit.

FURTHER CLARIFICATION

At the end of the school year, the instructional, professional development, and family involvement costs charged on the invoices should total the amount of funds generated by poverty private school children.



FURTHER CLARIFICATION



Contractor's administrative costs

- Must be included in the LEA's reservation for administration (section 200.77(f))

FURTHER CLARIFICATION



Ultimately, the LEA is responsible for ensuring that Title I services to eligible private school children, their teachers and families are compliant.

Questions



Answers

FOR ADDITIONAL INFORMATION

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