

**New Charter Schools Technical
Assistance Workshop**

January 18, 2013

**Office of Title I
New Jersey Department of Education**

Title I and Title III Technical Assistance Agenda

- Welcome
- Title I Program Requirements
- NCLB Consolidated Grant
- Parent Notification and Involvement
- Lunch
- Progress Targets
- Title III Requirements
- Fiscal Issues

The background features a light beige color with a pattern of stylized, overlapping leaves in various shades of yellow and light brown. A thin, dark red rectangular border is centered on the page, enclosing the text.

TITLE I PROGRAM REQUIREMENTS

OVERVIEW

1. To ensure that charter schools have a clear understanding of Title I requirements under ESEA.
2. To provide an overview of the Title I requirements that apply to charter schools.
3. To enable charter schools to implement and maintain compliance with Title I policies at the school level.
4. To provide guidance and support to charter schools in areas related to Title I requirements.

The Early Years – *In the Classroom*



1965 – *The Federal Level*

Sitting next to his First Grade teacher, President Johnson signs the Elementary and Secondary Education Act of 1965 on April 11, 1965.



Title I - A Brief History

- 1965 - Elementary and Secondary Education Act
- 1981 - Educational Consolidation and Improvement Act (Chapter 1)
- 1988 - Reauthorized – focus on accountability
- 1994 - Improving America's School Act (Title I)
- 2001 - No Child Left Behind
- 2008 - New Rules – CFR 200
- 2010 - Secretary's Blueprint for Reform
- 2011 - ESEA Flexibility Waivers

Purpose of Title I

- Provides supplemental educational opportunities
- Ensure children have fair, equal, and significant opportunity to obtain high quality education.
- Reach, at minimum, proficiency on challenging state standards & assessments (reading, mathematics, and readiness).

Intent of Title I

The intent is to help children who are most academically at-risk to be given the opportunity to obtain a high-quality education and reach proficiency on challenging state and academic standards and assessments.

Focus of Title I

The program focuses on promoting reform in high-poverty schools and ensuring student access to scientifically-based instructional strategies and challenging academic content.

Supplemental Opportunities

Title I, Part A provides federal dollars to help supplement educational opportunities for children who live in high poverty areas who are most at risk of failing to meet state's challenging achievement standards.

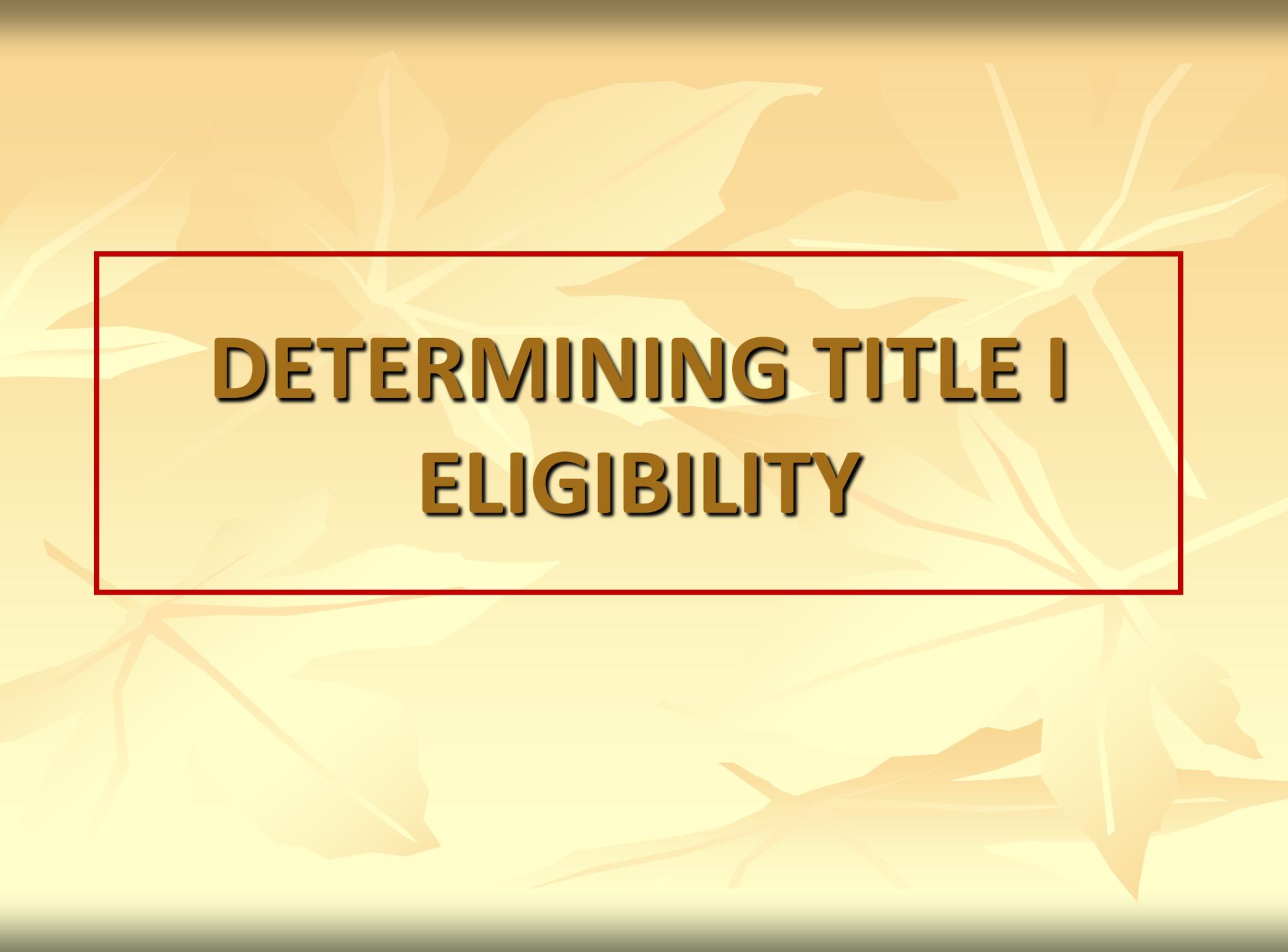
Title I , Part A- *Improving the Academic Achievement of the Disadvantaged*

Title I represents the largest federal *elementary* and *secondary* education program

- Funds are distributed to more than 84% of all New Jersey districts including charter schools.
- ***Allocations*** are based on the number of low-income students.
- ***Services*** are directed to those students who are the lowest-achieving or at the highest risk for school failure.
- Increases accountability for the educational outcomes of all children.

Title I Mandates

- Accountability reported publicly with sanctions and rewards
- Programs and instructional strategies must be based on scientific research
- Comprehensive parent notifications and involvement
- Highly qualified teachers and paraprofessionals
- Annual assessments for data analysis and informed instruction
- Covers early childhood through grade 12



**DETERMINING TITLE I
ELIGIBILITY**

Eligibility

Eligible School Attendance Area (§ 1113)

- The proportion of economically disadvantaged students in a school determines the amount of ***funds*** that may go to a school.
- Any student enrolled in an eligible school may receive Title I ***services*** if they are low achieving.
- All Title I funds must be distributed and accounted for.

Eligibility

Poverty Criteria

- Free lunch
- Reduced-price lunches
- Census
- Temporary Aid to Needy Families (TANF)
- Medicaid
- Composite
- Feeder method



COMPREHENSIVE NEEDS ASSESSMENT

Data-Driven Decision Making

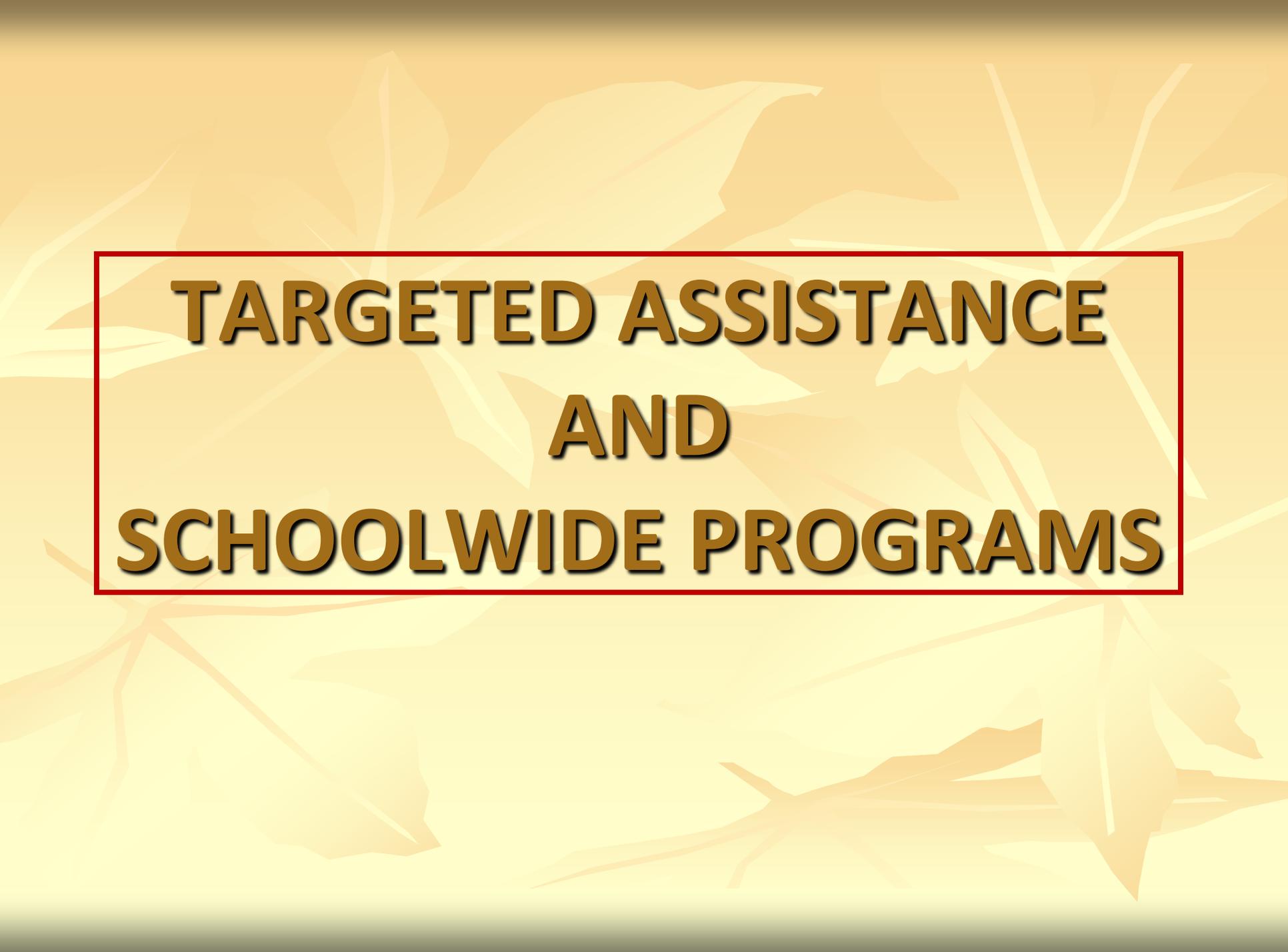
Purpose: Enable schools to identify their strengths and weaknesses, so they can specify priority problems and plan activities to help improve student achievement and meet state academic standards. The following can be used:

- State assessments
- District commercial tests and other data
- Teacher tests and observations
- Surveys and stakeholder input

Priority Problems

The problems selected by the district require an adequate description that identifies the following:

- The target population
- The causes of the problem
- The identification of the data source
- The analysis of the data, areas to be measured
- The measurement tool
- The specific school targets



**TARGETED ASSISTANCE
AND
SCHOOLWIDE PROGRAMS**

Targeted Assistance and Schoolwide Programs

Targeted Assistance



Schoolwide

Poverty Threshold 40%



Targeted Assistance Schools (TAS)

Direct services to *“targeted” students* in eligible schools who are identified as failing, or most at risk of failing, to meet the state’s content and student performance standards.

Targeted Assistance Programs

Establish entrance and exit criteria based on multiple, objective, and uniform criteria such as:

- Assessment results, teacher recommendations, and parent recommendations
- Children who have the greatest academic need receive Title I services
- Charter school may need to prioritize the student selection to provide a meaningful program

Targeted Assistance Programs

Essential Program Components (§ 1115)

1. Assist students in reaching state standards
2. Are based on effective means for improving student achievement
3. Ensure appropriate planning
4. Use instructional strategies effectively by minimizing pull-out and offering in-class support or extended day and summer programs
5. Coordinate with and support regular education programs such as pupil services (counseling, mentoring) and transition programs
6. Offer instruction by highly qualified staff
7. Provide professional development
8. Use strategies to increase parental involvement

Instructional and Programmatic Strategies

- ❖ In- class support
- ❖ Extended year programs
- ❖ Summer programs
- ❖ Transition programs
- ❖ Coaches
- ❖ Test prep classes
- ❖ Specified professional development

Schoolwide Programs

Criteria

- ❖ Title I funds are used to upgrade the instruction of the entire school to meet the state's academic standards.
- ❖ **40 percent** or more of the students enrolled in the school, or residing in the school attendance areas, must be from low-income families.
- ❖ A comprehensive needs assessment must be conducted.
- ❖ The district must meet with stakeholder group when developing the schoolwide plan

TITLE I SCHOOLWIDE PLAN

ESEA §1114(B)(i-v)

Any eligible school desiring to operate a schoolwide program must develop a comprehensive plan for reforming the total instructional program in a designated schoolwide school.

TITLE I SCHOOLWIDE PLAN

ESEA §1114(B)(i-v)

The schoolwide plan must include the following three elements:

1. A description of how the school will implement the mandatory schoolwide program components described below;
2. A description of how the school will use resources from Title I and other resources to implement those components; and
3. A list of federal, state, and local programs that will be consolidated in the schoolwide program.

Schoolwide Component- Evaluation

34 CFR § 200.26 (c)

A school operating a schoolwide program must—

- (1) Annually evaluate the implementation of, and results achieved by, the schoolwide program, using data from the State's annual assessments and other indicators of academic achievement;
- (2) Determine whether the schoolwide program has been effective in increasing the achievement of students in meeting the State's academic standards, particularly for those students who had been furthest from achieving the standards; and
- (3) Revise the plan, as necessary, based on the results of the evaluation, to ensure continuous improvement of students in the schoolwide program.

Schoolwide Program Components

ESEA §1114(b)(I)(B)

Schoolwide programs **MUST** contain the following program components:

1. Schoolwide Reform Strategies;
2. Instruction by Highly Qualified Teachers;
3. Family and Community Engagement; and
4. Additional Support(s)

Schoolwide Reform Strategies

ESEA § 1114(b)(1)(B)

- Provide all students in the school the opportunity to meet the state's proficient and advanced levels of student academic achievement
- Use effective methods and instructional strategies that are grounded in scientifically based research
- Strengthen the core academic program in the school

Schoolwide Reform Strategies

ESEA § 1114(b)(1)(B) cont'd

- Increase the amount and quality of learning time(i.e. extended school year and before and after school programs, and summer programs)
- Provide an enrich and accelerated curriculum
- Meet the educational needs of historically underserved populations
- Include strategies to address the needs of **ALL** children in the school(particularly, the needs of low-achieving students)

Instruction by Highly Qualified Teachers

ESEA §1114(b)(1)(E)

- Include strategies to attract highly qualified teachers
- Provide high quality and on-going professional development
- Devote sufficient resources to effectively carry out professional development
- Included teachers in professional development activities regarding assessments in an effort to improve academic achievement for individual students and the overall instructional program for the entire school.

Additional Supports

ESEA § (b)(1)(D)

Schools operating a schoolwide program must ensure that it provides activities for students who experience difficulty mastering the proficient or advanced levels of academic achievement will be provided with effective, and timely additional assistance. This additional assistance consists of:

- Ensure that students' difficulties are identified on a timely basis; and
- Provide sufficient information on which to base effective assistance

Supplement Not Supplant

Schoolwide Program Schools

- Must use Title I funds only to supplement the amount of funds that would, in the absence of Title I funds, be made available for that schoolwide program (including funds needed to provide services required by law for disabled children and LEP children).

Targeted Assistance Schools

- Title I funds must be used only to supplement the level of funds that would, in the absence of Title I, be available from non-federal (state and local) sources for Title I students.
- The district is not required to provide Title I services using a particular instructional method (i.e., pull out programs, in class, etc.).
- Based on services.

Supplement Not Supplant

Presumption of supplanting

- The district has used the Title I funds to provide services that the district was required to make available under federal, state or local law.
- The district used Title I funds to provide services it provided with non-federal funds in the prior year(s).
- The district has used Title I funds to provide services for participating children that it provided with non-federal funds for non-participating children.



**PROFESSIONAL DEVELOPMENT
IN TITLE I SCHOOLS**

PROFESSIONAL DEVELOPMENT(PD)

- Must be sustained, high-quality, classroom-focused training in core content areas and strategies that work
- Use of Title I funds for PD will vary depending upon Title I program
- Title I teachers, principals, paraprofessionals, and other staff may participate.

PROFESSIONAL DEVELOPMENT

Allowable Uses

- Strategies tied to the state's CCCS, state student performance standards and consistent with the district's needs assessment
- Activities involving parents in the education of their children
- Activities addressing the needs of teachers in Title I schools and students most "academically" at-risk
- Activities incorporating teaching strategies in the CCCS areas for meeting the needs of "academically" at-risk students.

The background of the slide features a repeating pattern of stylized, overlapping leaves in various shades of light beige and cream. The leaves are rendered in a flat, graphic style with visible veins. A thin, dark red rectangular border is centered on the page, framing the text.

PARAPROFESSIONALS

TITLE I PARAPROFESSIONALS

Requirements

Instructional paraprofessionals in targeted assistance and schoolwide programs **MUST** meet one of the following criteria:

- Have an Associate's Degree
- Completed two years of college coursework
- Passed a rigorous test showing the ability to assist with the teaching of reading, writing, and mathematics

TITLE I PARAPROFESSIONALS

Duties

1. Provide one-on-one tutoring when a student is not being instructed by a teacher.
2. Assist with classroom management.
3. Provide instructional assistance in a computer lab.
4. Conduct parental involvement activities.
5. Provide support in a library/media center.
6. Act as a translator.
7. Provide instructional support under the direct supervision of a teacher.

The background features a light beige gradient with faint, stylized leaf patterns in various shades of tan and brown. A prominent red rectangular border is centered on the page, enclosing the main text.

TITLE I SCENARIOS

Title I Targeted Assistance Program

Scenarios

- A district with a Targeted Assistance Program has an afterschool program for its Title I students. With Title I funds, it wants to pay the salary of the Title I teacher, instructional materials for the students in this afterschool program, and iPads for all these students to use as part of the program. Are all of these things allowable?
- ***YES! All of these costs are supplemental and used for Title I teachers/students only.***

Title I Targeted Assistance Program

Scenarios

- District has 3 elementary schools. School A and B are Title I-funded schools with a Targeted Assistance Program. School C is not a Title I school. The district wants to pay the salaries of its basic skills teachers in School A and B with Title I funds and will pay the salaries of its basic skills teachers in School C with local funds. Is this allowable?
- ***NO! This is supplanting.***

Title I Targeted Assistance Program

Scenarios

- A Title I school with a Targeted Assistance Program would like to send all of its Math teachers to a Math Recovery professional development program that provides a powerful mathematics intervention framework that gives teachers the unique techniques and assessment tools they need to help elementary children achieve lifetime results. Is this allowable?
- ***NO! In a Targeted Assistance Program, the Title I funds for professional development must benefit Title I staff.***

Title I Targeted Assistance Program Scenarios

- A Title I school with a Targeted Assistance Program would like to invite an expert from Math Recovery to come to their school and provide professional development to all their math teachers on a program that provides a mathematics intervention framework that gives teachers the unique techniques and assessment tools they need to help elementary children achieve lifetime results. Is this allowable?
- ***YES! District may pay for a consultant/expert to come to school district to provide professional development that primarily benefits Title I staff. The other teachers may attend as "incidental benefit."***

Title I Targeted Assistance Program Scenarios

- A Title I school with a Targeted Assistance Program would like to put in three SmartBoards in language arts classes where the majority of students (about 70%) are Title I. Is this allowed?
- ***NO! Title I instructional equipment must benefit Title I students only.***

WEB SITE RESOURCES

NJ Department of Education

<http://www.nj.gov/njded/title1/>

<http://www.nj.gov/njded/grants/nclb/>

<http://www.state.nj.us/education/grants/nclb/waiver/>

US Department of Education Guidance

<http://www.ed.gov/print/programs/title1parta/legislation.html>

<http://www.ed.gov/esea/flexibility>

NCLB Consolidated Subgrant Reference Manual

<http://www.nj.gov/njded/grants/entitlement/nclb/nclbrefman.pd>

President's Blueprint for Reform

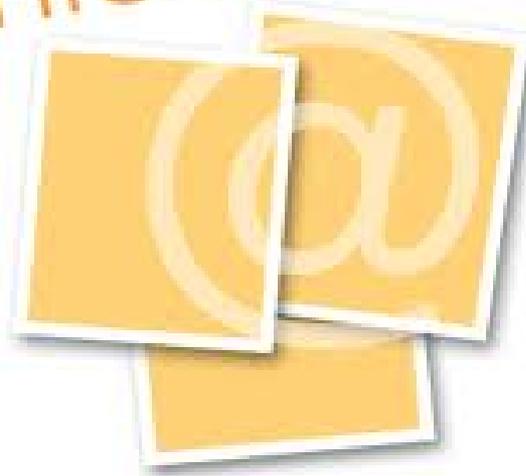
<http://www2.ed.gov/policy/elsec/leg/blueprint/publicationtoc.html>

US Department of Education Non-Regulatory Guidance

- Targeted Assistance
- Schoolwide Programs
- Parental Involvement
- Paraprofessionals
- Private School Children

Web site: <http://www.nj.gov/njded/title1/leg/>

Contact Us!



titleone@doe.state.nj.us



**NCLB CONSOLIDATED
GRANT**

Office of Grants Management

- Conduit among the program offices, county offices, and federal government
- Resource to districts on how to utilize the grant system-EWEG
- Final Review of grants (Entitlement grants)

EWEG/NJDOE Homeroom

- <http://homeroom.state.nj.us>
- How we manage grants
- Logging on-Internet Explorer, PC
- User ID and Passwords
 - Homeroom/Technology Administrator
- SAGE-2013

Grant Period

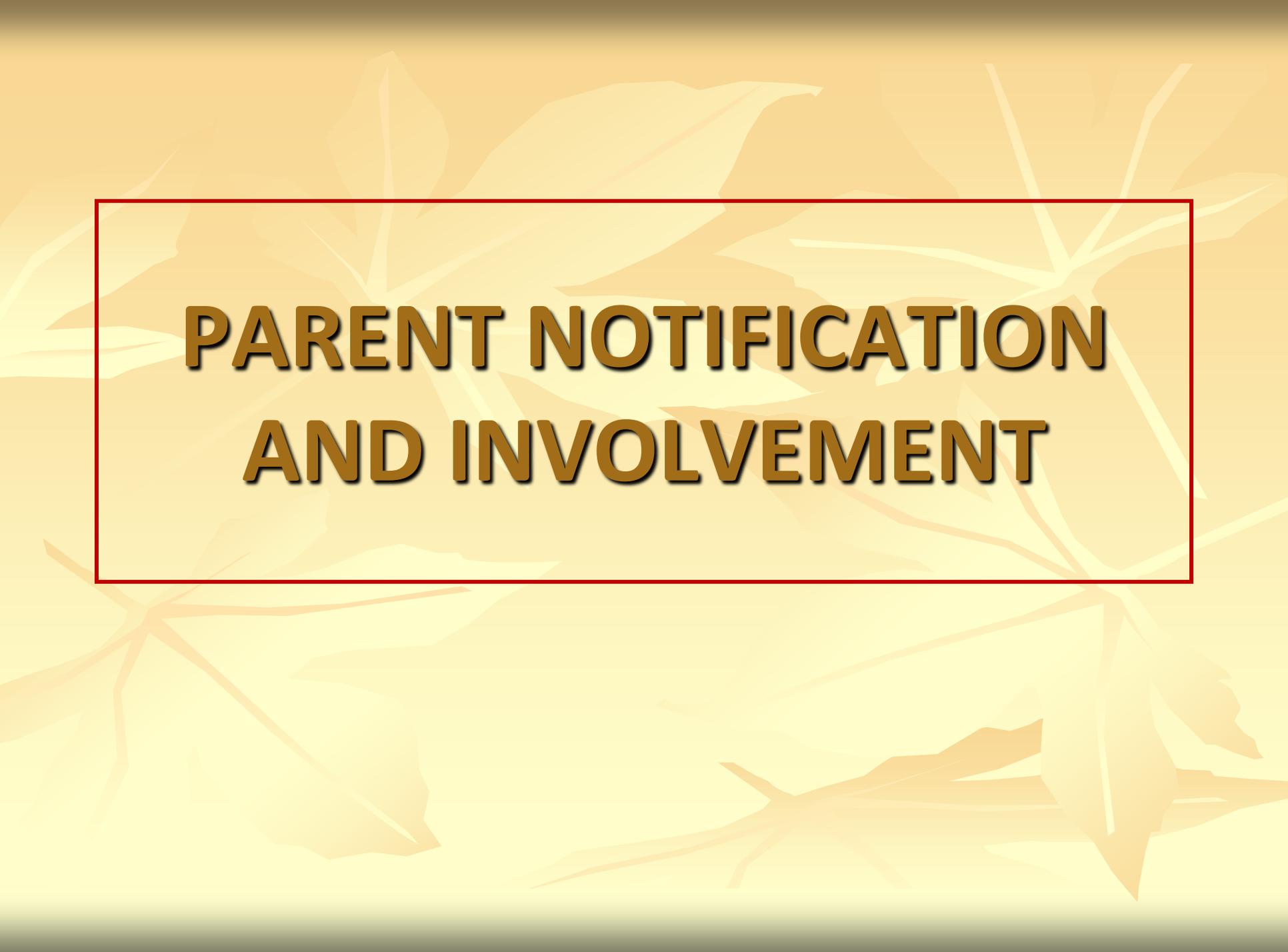
- Current Year: (9/1 – 8/31)
- Carryover Year: Unexpended prior year unobligated balances brought forward to current year (9/1 – 8/31)
- Liquidation Period: Within 45 days of the end of the carryover period.

Allocations/Application/ Amendment/Final Expenditure Report (cycle)

- Enrollments-
 - 1st year 50%, 2nd year adjustment, Oct 15th count
- Sections
 - Review Process: Two Levels
 - 1st Level – County (primarily programmatic)
 - 2nd Level – OGM (primarily fiscal)
- Reimbursements
- Ex. Public Access-What are other charters doing in the application?
- Needs Assessment/Program Plan/Budget
- Instructions links

Supplement not Supplant

- **NCLB-In absence of federal dollars, what would occur regarding the proposed program, service, and/or activity?**
- **Positions Funded in Prior Year**

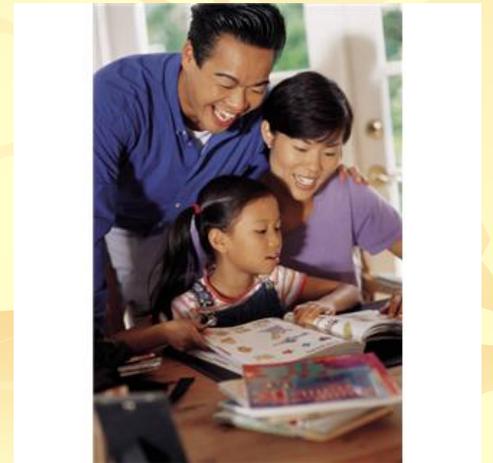


PARENT NOTIFICATION AND INVOLVEMENT



Parental Involvement

New Jersey Department of Education
Student and Field Services
Office of Title I



Parental Involvement

The Elementary and Secondary Education Act (ESEA), Title I statute defines “parental involvement” as the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities.

Why is Parental Involvement Important?

- It's required by law.
- It has been proven to help raise student achievement.

How Do We Pay For Parental Involvement?

- Must reserve 1% of your Title I allocation over \$500,000.
- 95% of the reserve must be used for Parental Involvement.

Note:

- The reserved may not be used for all parents. It is for Title I parents only.
- Comprehensive and based upon parent's needs.

Parents' Right-to-Know [Section 1111]

At the beginning of the school year title I schools must notify parents in writing of their right to request the following information about their child's teacher:

- Whether the teacher has met state qualifications and licensing criteria.
- Whether the teacher has a baccalaureate degree, certification in discipline/subject and all other pertinent qualifications.
- Whether the child is provided services by paraprofessionals, and, if so, their qualifications.
- The School **must** notify parents when their child has been taught for four consecutive weeks by a teacher not highly qualified.

Language Instruction Education Program [Section 1111]

Not later than 30 days after the beginning of the school year, the district is required to inform the parent(s) of a limited English proficient child identified for participation in a language instruction educational program of the following:

- The reasons for the identification of their child as limited English proficient and in need of placement in a language instruction educational program.
- The child's level of English proficiency, how such level was assessed, and the status of the child's academic achievement.

Annual Parent Meeting

An annual meeting must be conducted for parents of participating children to inform parents of the Title I program.

This meeting must be held early in the academic year.

The Written Parental Involvement Policy [Section 1118]

School Policy Requirements

Each school must develop, jointly with parents of children participating in Title I services, a written school parental involvement policy that describes how the school will carry out the parental involvement requirements in §1118(c)(f), including the development of a parent compact

The Written Parental Involvement Policy [Section 1118]

Describes how the district will:

- Involve parents in developing the district's plan for school review and improvement
- Build schools' and parents' capacity for strong parental involvement
- Coordinate and integrate parental involvement strategies with other programs (e.g., Head Start, Reading First, etc.)
- Conduct an annual evaluation of the content and effectiveness of the parental involvement policy
- Involve parents in the activities of schools served under Title I, Part A

The School-Parent Compact: Shared Responsibility for High Student Achievement [Section 1118]

Each school must develop a school-parent compact jointly with parents, student and teachers of students receiving Title I services that outlines:

- How parents, the entire school staff, and students will share the responsibility for improved student academic achievement.
- How the school and parents will build and develop a partnership to help children achieve the state's high standards.

Parental Involvement

Consequences of not having an active,
documented parental involvement
program

Consolidated Monitoring

- **Finding**: The district does not have a parent involvement program that reflects the requirements of the Title I legislation.
- **Citation**: ESEA §1118: *Parental Involvement*.
- **Recommendation**: The district must ensure that Title I funded schools use their Title I parent involvement funds to implement programs and activities that are aligned with the statutory and regulatory requirements. Initially, the district must ensure that each Title I school has a parent involvement policy and a school-parent compact that is developed with the input of parents and distributed directly to parents of students participating in the Title I program. The district must submit a copy of the policy to the NJDOE for review as well as a list of its planned expenditures for the funds in the parent involvement reserve.

Web Site Resources

- NJ Department of Education

<http://www.nj.gov.njded.title1/>

- School/Family/Community Involvement

<http://www.state.nj.us/education/title1/program/parent/>

Contact

Peggy Porche

Parent Involvement Coordinator

Peggy.porche@doe.state.nj.us

UNDERSTANDING ACCOUNTABILITY: PROGRESS TARGETS

New Jersey Department of Education selected Option A under Principal 2B of the ESEA Flexibility, Set Ambitious but Achievable Annual Measurable Objectives.

Progress Targets

- Under Option A, New Jersey selected the goal of closing half of its achievement gap within six years and calculated Progress Targets for the state, districts, schools and subgroups based on closing this gap in equal increments each year.
- Proficiency rates based on the following assessments were used as the starting point for setting the baseline.
 - Grades 3-8 – NJASK Assessment 2010-11
 - High School –HSPA Banked Cohort 2010

Proficiency Goal

- The six-year goal (2016–2017) for the percentage of proficient students is determined by:
 - Calculating the percentage of students who are not proficient;
 - Dividing that percentage in half; and
 - Subtracting it from 100 percent.
- Annual progress targets are set in equal increments toward a goal of reducing by half the percentage of students, in the “all students” group and each subgroup, who are not proficient within six years.

Example

- Calculate the percentage of students who are partially proficient.
 - The 'all students' group is currently demonstrating a proficiency rate of 40%
 - $(100 - 40 = 60)$ 60% is the partially proficient rate
- Divide the partially proficient rate in half; and
 - $(60\% / 2 = 30\%)$
- Subtract it from 100 to determine the six year goal.
 - $(100\% - 30\% = 70\%)$ 70% proficient is required by 2016-17
- Annual progress targets are set in 6 equal increments toward a goal of reducing by half the percentage of students.
 - $(30\% / 6 = 5\%$ each year)
- The school in this example begins this process with a proficiency rate of 40% and is then expected to move to proficiency rates of 45%, 50%, 55%, 60%, 65%, and finally 70% in each of the following years of the six-year period.

Conditions Applied

- Separate progress targets are determined for the state, each district, school, and subgroup in Language Arts Literacy and Math.
- Progress targets are calculated on aggregated scores for all students and each subgroup utilizing assessment results for grades 3-8 and 11.
- Aggregate all students – not by grade spans.
- A minimum “N” size of 30 applies for all students and for each subgroup.

Subgroups

- All Students
- Students with Disabilities
- Economically Disadvantaged
- Limited English Proficient
- African American
- Asian
- Hispanic
- Native American
- White
- Two or More Races

Highest Performing Schools and Subgroups

- The NJDOE determined that for the highest performing schools and subgroups, such a process will likely present unreasonable targets.
- The NJDOE established that schools and subgroups could meet expectations by either reaching their individually determined progress targets or a proficiency goal of 90 percent. This rate will be increased to 95 percent in 2015.

ESEA Waiver - Annual Progress Targets

| | |
|------------|---|
| CDS CODE : | Baseline Year TITLE I Status : Yes |
| DISTRICT : | Baseline Year DFG : CD |
| SCHOOL : | Baseline Year Grade Range : 6-8 |

The tables represent the annual proficiency targets, established for this school under ESEA Waiver. Schools and subgroups could meet expectations either by meeting the statewide proficiency rate of 80 percent, or reaching their individually determined progress targets. The statewide proficiency rate will be increased to 85 percent in 2015.

Performance Targets - Language Arts Literacy

| Subgroup | # of Valid Test Scores | Baseline % Proficient | Yearly Increment | 2011-2012 Target (%) | 2012-2013 Target (%) | 2013-2014 Target (%) | 2014-2015 Target (%) | 2015-2016 Target (%) | 2016-2017 Target (%) |
|-----------------------------|------------------------|-----------------------|------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Schoolwide | 342 | 72.8 | 2.3 | 75.1 | 77.4 | 79.7 | 82 | 84.3 | 86.6 |
| White | 228 | 81.7 | 1.5 | 83.2 | 84.7 | 86.2 | 87.7 | 89.2 | 90 |
| Black | 41 | 48.7 | 4.3 | 53 | 57.3 | 61.6 | 65.9 | 70.2 | 74.5 |
| Hispanic | 31 | 51.6 | 4 | 55.6 | 59.6 | 63.6 | 67.6 | 71.6 | 75.6 |
| American Indian | - | - | - | - | - | - | - | - | - |
| Asian | 35 | 65.7 | 2.9 | 68.6 | 71.5 | 74.4 | 77.3 | 80.2 | 83.1 |
| Two or More Races | - | - | - | - | - | - | - | - | - |
| Students with Disabilities | 64 | 33.3 | 5.6 | 38.9 | 44.5 | 50.1 | 55.7 | 61.3 | 66.9 |
| Limited English Proficiency | - | - | - | - | - | - | - | - | - |
| Economically Disadvantaged | 86 | 48.2 | 4.3 | 52.5 | 56.8 | 61.1 | 65.4 | 69.7 | 74 |

Performance Targets - Mathematics

| Subgroup | # of Valid Test Scores | Baseline % Proficient | Yearly Increment | 2011-2012 Target (%) | 2012-2013 Target (%) | 2013-2014 Target (%) | 2014-2015 Target (%) | 2015-2016 Target (%) | 2016-2017 Target (%) |
|-----------------------------|------------------------|-----------------------|------------------|----------------------|----------------------|----------------------|----------------------|----------------------|----------------------|
| Schoolwide | 342 | 76.9 | 1.9 | 78.8 | 80.7 | 82.6 | 84.5 | 86.4 | 88.3 |
| White | 228 | 80.7 | 1.6 | 82.3 | 83.9 | 85.5 | 87.1 | 88.7 | 90 |
| Black | 41 | 65.9 | 2.9 | 68.8 | 71.7 | 74.6 | 77.5 | 80.4 | 83.3 |
| Hispanic | 31 | 64.5 | 3 | 67.5 | 70.5 | 73.5 | 76.5 | 79.5 | 82.5 |
| American Indian | - | - | - | - | - | - | - | - | - |
| Asian | 35 | 80 | 1.7 | 81.7 | 83.4 | 85.1 | 86.8 | 88.5 | 90 |
| Two or More Races | - | - | - | - | - | - | - | - | - |
| Students with Disabilities | 64 | 46.3 | 4.5 | 50.8 | 55.3 | 59.8 | 64.3 | 68.8 | 73.3 |
| Limited English Proficiency | - | - | - | - | - | - | - | - | - |
| Economically Disadvantaged | 86 | 63.5 | 3.1 | 66.6 | 69.7 | 72.8 | 75.9 | 79 | 82.1 |

Participation Rate

- 95% Participation rate is required for meeting the progress targets.
- Participation rates are determined for all students and for each subgroup for LAL and Math.
- Participation Averaging is applied if the school misses only the participation rate, then an average of three years of participation is calculated and utilized as the participation rate.

Meeting Expectations

- Annual proficiency is compared to annual progress targets.
- Calculate the percent Proficient:
 - Add the number of Proficient and Advanced Proficient results and divide by the number of Valid Test results.
- Yearly performance must meet or exceed the determined annual progress target or reach the proficiency goal of 90 percent. This rate will be increased to 95 percent in 2015.

Meet Expectations (con't)

- A Confidence Interval (CI) is a statistical method to minimize the risk of falsely identifying any marginal school as not meeting the Progress Target,
- A confidence interval at 95% probability is applied to the actual results for the total population as well as each student subgroup for each content area as an additional criterion for meeting Progress Targets.

Meet Expectations (con't)

- If a proficiency goal of 90 percent is reached then subgroup met goal. (MET GOAL)
- If proficiency meets or exceeds the determined annual progress target subgroup met target. (YES)
- If the target is within the CI then subgroup met target with (CI)conditions. (YES*)
- If the proficiency the CI is below the target then expectations are not met. (NO)

Flexibility Applied

- Only full year students are included in performance measures; students who are in school less than a year are removed ($TIS < YR$).
- Former Limited English Proficient students, who have left the program within 2 years, are considered.
- Alternate Proficiency Assessment results are included.

ESEA Waiver - Preliminary School Profiles 2012

CDS CODE :
 DISTRICT :
 SCHOOL :

This table presents the participation and performance determinations for this school under New Jersey's Elementary and Secondary Act Waiver

School Performance - Language Arts Literacy

| Subgroup | Statewide Participation Rate - 95% | | | Statewide Performance Goal - 90% | | | |
|-----------------------------|------------------------------------|--------------|-------------------|----------------------------------|--------------|--------|-----------------|
| | # Enrolled | % Not Tested | Met Participation | Total Valid Scores | % Proficient | Target | Met Performance |
| Schoolwide | 363 | 0.3 | YES | 251 | 74.1 | 75.1 | YES* |
| White | 226 | 0.0 | YES | 162 | 82.1 | 83.2 | YES* |
| Black | 60 | 0.0 | YES | 38 | 55.3 | 53 | YES |
| Hispanic | | | - | | | - | - |
| American Indian | | | - | | | - | - |
| Asian | | | - | | | - | - |
| Two or More Races | | | - | | | - | - |
| Students with Disabilities | 47 | 2.1 | YES | 34 | 47.1 | 38.9 | YES |
| Limited English Proficiency | | | - | | | - | - |
| Economically Disadvantaged | 123 | 0.8 | YES | 79 | 59.5 | 52.5 | YES |

School Performance - Mathematics

| Subgroup | Statewide Participation Rate - 95% | | | Statewide Performance Goal - 90% | | | |
|-----------------------------|------------------------------------|--------------|-------------------|----------------------------------|--------------|--------|-----------------|
| | # Enrolled | % Not Tested | Met Participation | Total Valid Scores | % Proficient | Target | Met Performance |
| Schoolwide | 363 | 0.3 | YES | 251 | 74.1 | 78.8 | YES* |
| White | 226 | 0.0 | YES | 162 | 78.4 | 82.3 | YES* |
| Black | 60 | 0.0 | YES | 38 | 57.9 | 68.8 | YES* |
| Hispanic | | | - | | | - | - |
| American Indian | | | - | | | - | - |
| Asian | | | - | | | - | - |
| Two or More Races | | | - | | | - | - |
| Students with Disabilities | 47 | 2.1 | YES | 34 | 61.8 | 50.8 | YES |
| Limited English Proficiency | | | - | | | - | - |
| Economically Disadvantaged | 123 | 0.8 | YES | 79 | 59.5 | 66.6 | YES* |

Only includes full year students for performance (Time In School < Year students are removed)

* Indicates too few students to determine (N<40 for Participation and N<30 for Performance)

Title I
 Accountability
 System

MET GOAL Met Performance Goal of 90%

YES* Met Progress Target (Confidence Interval applied)

YES Met Progress Target or Participation Rate

NO Missed Progress Target or Participation Rate

10/9/2012

Proficiency Greater than 90%

- If baseline proficiency is 90% or greater, the increment is not determined.
- All annual targets are set at the statewide goal of 90%, after 2015 increased to 95%.
- Baseline proficiency is not recalculated if performance falls below 90% in subsequent years; school must meet the 90% target.
- Current progress target table would indicate “-” for increment and max of 90% is set as the target.

N<30

- Progress targets are not determined for subgroups less than 30 students.
 - In a case where a minimum n-size = 2 , results are not reliable.
- Establish new baseline targets once the population reaches minimum n-size = 30.
- Reports would indicate “-” for the subgroups with no increment or target determined.

Resources

- Understanding Accountability:
<http://www.nj.gov/education/title1/accountability/progress/12/understanding.pdf>
- titleone@doe.state.nj.us
- RAC@doe.state.nj.us

The background features a light beige color with a pattern of stylized, overlapping leaves in various shades of yellow and light brown. A thin, dark red rectangular border is centered on the page, enclosing the text.

TITLE III REQUIREMENTS

Objectives

Participants will gain an understanding of:

- N.J. law and code that govern language assistance programs in schools;
- Procedures for identifying English language learners and determining language assistance program placement
- Language assistance program models
- State and federal funding sources.
- Assessment requirements and accommodations for ELLs; and
- Available professional development resources

State Profile of English Language Learners 2011

- Total Students taking ACCESS test: 56,140
- Median Language Proficiency Level: 3.7

Grade

| | |
|-------------|-----------|
| ■ K: 10,480 | 7: 2,582 |
| ■ 1: 8,834 | 8: 2,653 |
| ■ 2: 6,984 | 9: 3,414 |
| ■ 3: 5,101 | 10: 3,117 |
| ■ 4: 3,364 | 11: 2,546 |
| ■ 5: 2,751 | 12: 1,829 |
| ■ 6: 2,485 | |

Top Ten Languages

| | |
|------------------|--------|
| ■ Spanish | 37,550 |
| ■ Arabic | 1,689 |
| ■ Haitian Creole | 1,280 |
| ■ Korean | 1,106 |
| ■ Chinese | 1,105 |
| ■ Gujarati | 978 |
| ■ Portuguese | 779 |
| ■ Bengali | 737 |
| ■ Urdu | 709 |

A Sampling of Languages

Karachay-Balkar , Zulu, Fang , Herero , Papiamentu,
Hiligaynon , Balinese , Bislama , Chuukese , Somali ,
Mossi , Xhosa , Santali , Kongo , Soninke , Kru Tiv,
Tsonga, Uyghur, Ga Nepal ,Bhasa, Newari , Croatian,
Iloko , Oriya , Mongolian, Afrikaans , Romanian,
Moldavian,; Moldovan ,Chechen , Tigrinya , Hausa
,Czech , Norwegian ,Nynorsk, Nynorsk, Cebuano ,
Pampanga; Kapampangan , Lao Mende, Chichewa;
Chewa; Nyanja

Identifying LEP Students

- Maintain a census indicating all students whose native language is other than English;
- Develop a screening process, initiated by a home language survey, to determine which students in K to 12th grade must be tested to determine English language proficiency. K-12 students who are not screened out must be tested with a department-approved English language proficiency test

http://www.nj.gov/education/bilingual/resources/prof_tests.htm

In addition, the following indicators must be considered **(Multiple measures)**:

- Level of reading in English;
- Previous academic performance;
- Achievement on standardized tests in English; and
- Teacher judgment

Identifying LEP Students (con't.)

- Students who do not meet the Department standard on a Department-approved language proficiency test and who have at least one other indicator, are students of limited English proficiency.
- State and federal law require parental notification and consent for placement in a language assistance program.

Letter requirements:

<http://www.nj.gov/education/bilingual/title3/accountability/notification/>

Parental consent:

http://www.state.nj.us/education/bilingual/policy/6a15_qanda.htm

Translations:

<http://www.nj.gov/education/bilingual/resources/letter/>

<http://www.nj.gov/education/bilingual/title3/accountability/notification/letters/>

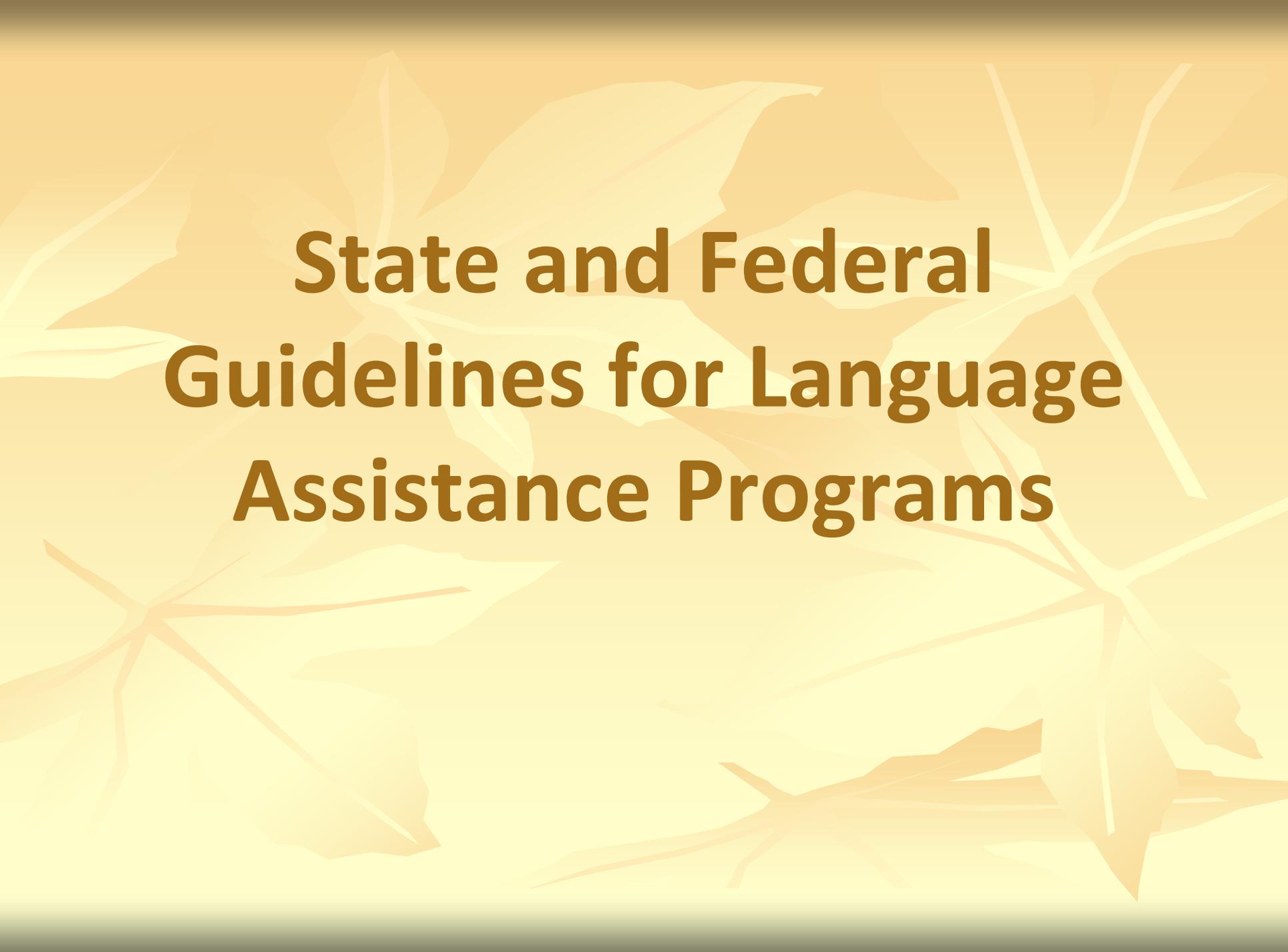
English Language Proficiency Tests for Identification of ELLs

1. IDEA Proficiency Test (IPT)
2. Maculaitis II (MACII) Test of English Language Proficiency
3. Language Assessment Scales (LAS)
4. WIDA ACCESS Placement Test (W-APT)
5. Comprehensive English Language Learning Assessment (CELLA)
6. Language Assessment Scales Links (LAS Links)
7. WIDA MODEL

http://www.nj.gov/education/bilingual/resources/prof_tests.htm

Required Test for all Title III recipient districts:

ACCESS for ELLs



**State and Federal
Guidelines for Language
Assistance Programs**

N. J. Bilingual Education Code Requirements N.J.A.C. 6A:15

- Bilingual Education: 20 or more ELLs of any one language classification in the district—may be full- time or part-time.
- English as a Second Language (ESL): 10 or more ELLs enrolled in the district
- English Language Services (ELS): One or more, but fewer than 10 ELLs enrolled in a district

<http://www.nj.gov/education/code/current/title6a/chap15.pdf>

ESL/Bilingual/ELS Three-Year Program Plans

- Program plans are required every three years for Bilingual, ESL and English Language Services
- Current program plans are for 2011 to 2014
- Districts no longer have to submit program plans to the NJDOE for approval, but must keep them on file in the district.



Language Assistance Programs

Language Assistance Programs

Four Types of Programs

- Full-time Bilingual Program with ESL support
- Alternative programs that use students' native-language for instruction
- Alternative programs that are English-based (High-Intensity ESL, Sheltered Instruction)
- ESL-Only
- English Language Services (ELS)

Full-Time Bilingual Program with ESL Support

Full-time program of instruction in all subjects which a child is required by law or rule to receive, administered in the *native language* of the limited English proficient student and also in English.

A bilingual program must be provided when there are **20 or more limited English proficient students in any one language classification** enrolled within the school district.

Alternative Programs that use Students' Native-Language

A part-time program of instruction for students in districts where there is no full-time bilingual program available.

Alternative Programs that are English-Based

An alternative program of instruction for students in districts where there is no full-time bilingual program available.

Alternative program options are:

- ❖ **High-Intensity ESL-two or more periods of ESL**
- ❖ **Sheltered Instruction**

ESL-Only

A daily developmental second language program of up to **two periods of instruction** based on students' needs.

An ESL-Only program must be provided when there are **10 or more LEP students** enrolled within the school district.

English Language Services (ELS)

Services designed to improve the English language skills of students of limited English proficiency.

These services are provided in districts with ***fewer than 10 students*** of limited English proficiency. It is recommended that districts provide a period of English language services instruction at least three times per week.



Federal Requirements

ESEA Title III

Provides funding: *To help ensure that limited English proficient students attain English proficiency, develop high levels of academic achievement in English and meet the same academic standards as all students are expected to meet.*

Title III

- Formula Grants to States and Districts
 - to increase English language proficiency
 - to provide professional development
- Apply through consolidated NCLB application process
- Subgrants must be at least \$10,000 or districts may form consortia to meet minimum

Uses of Title III Funds

- Curricular Materials
- Technology
- Support personnel
- Tutorials, mentoring, academic
or career counseling
- Community Programs/Services
- Parental Involvement/Outreach
- Supplemental Instructional Services
- Family Literacy Services
- Professional development of all teachers

Title III Immigrant Funds

- Provides additional funds for school districts that experience significant increases in their enrollment of immigrant children and youth
- Funds may be used to pay for activities that provide enhanced instructional opportunities for immigrant students

Federal Definition of Immigrant Student

- Aged 3 to 21
- Were not born in any state,
- Have not been attending one or more schools in one or more states for more than three full academic years.

Eligibility Criteria for Immigrant Funds

- Combined public and nonpublic immigrant student enrollment must be at least a 2% increase as compared to the average of the two previous years
- Total public and nonpublic enrollment must be 20 or more immigrant students
- Do not have to be eligible for Title III funds

Federal Requirements

- **Standards:** WIDA English Language Development Standards

<http://www.wida.us/>

- **Assessment:** ACCESS for ELLs[®] English Proficiency Test

<http://www.nj.gov/education/bilingual/ells/>

- **Accountability:** Annual Measurable Achievement Objectives

<http://www.nj.gov/education/bilingual/title3/accountability/>

ACCESS for ELLs[®]

- **ACCESS for ELLs[®]** stands for *Assessing Comprehension and Communication in English State-to-State for English Language Learners*.
- addresses the English language development **standards** that form the core of the WIDA Consortium's approach to instructing and testing English language learners
- **grade level clusters** include PreK-K, 1-2, 3-5, 6-8, and 9-12
- **four language domains:** Listening, Speaking, Reading, and Writing.

ACCESS for ELLs

Language Proficiency Levels

- **Level 1 - Entering**
- **Level 2 - Emerging**
- **Level 3 - Developing**
- **Level 4 - Expanding**
- **Level 5 - Bridging**
- **Level 6 - Reaching**

Assessment of English Language Learners

- English Language Proficiency Tests
- Statewide Assessments
 - Allowable accommodations on the NJASK /HSPA
 - Extra Time
 - Use of bilingual dictionaries
 - Translation of Test Directions
- NJASK Spanish Version



Professional Development

Bilingual/ESL Professional Development Opportunities

- Calendar of NJDOE Workshops
<http://education.state.nj.us/events/>
- NJDOE Bilingual Education Homepage
<http://www.state.nj.us/education/bilingual/>
- Fall Workshops for New and Experienced Supervisors of Bilingual/ESL/ELS Programs
- Sheltered English Instruction Training of Trainers
- Statewide Conferences with NJTESOL/ NJBE
<http://www.njtesol-njbe.org/spring-conference/default.htm>

Bilingual/ESL Model Program Resource Centers 2012-2014

- Clifton Public Schools, Bilingual/ESL Model Program, K-12 Program: ESL Program with Bilingual Support
- Howell Township Public Schools, ESL Model Program, K-8 Program
- Linden Public Schools, ESL Model Program, K-12 Program
- River Edge Public Schools, ESL Model Program, K Program: *New Bridge Center School*
- Roselle Borough Public Schools, Bilingual Model Program, 1-4 Program: *Harrison Elementary School*
- West Windsor-Plainsboro Public Schools, ESL Model Program, 6-12 Program

English Language Learners in the Mainstream Tutorial

- http://www.nj.gov/education/njpep/pd/ell_mainstream/index.html
- teacher videos
- student audio segments

Resources

- Bilingual Education website: <http://www.nj.gov/education/bilingual/>
- ESL Curriculum Exemplars: <http://www.state.nj.us/education/bilingual/resources/curriculum/>
- WIDA: www.wida.us
- NJTESOL-NJBE: www.njtesol-njbe.org
- Colorin Colorado: <http://www.colorincolorado.org/>

Office of Title I Bureau of Bilingual/ESL Education

Karen Campbell, Director

karen.campbell@doe.state.nj.us

Raquel Sinai, Bilingual/ESL Coordinator

raquel.sinai@doe.state.nj.us

Lori Ramella, Bilingual/ESL Education Program Specialist

lori.ramella@doe.state.nj.us

Kenneth Bond, Bilingual/ESL Education Program Specialist

kenneth.bond@doe.state.nj.us

www.state.nj.us/education

<http://www.nj.gov/education/bilingual/>

(609) 292-8777

FEDERAL GRANT FISCAL RESPONSIBILITIES THE NEW CONSOLIDATED MONITORING PROCESS

Are You Fiscally Compliant?

Presented by:
Anthony Hearn, CPA
Office of Title I

Consolidated Monitoring

*PURPOSE: Successful Program Implementation and Proper use
of Funds*

Four Teams in NJDOE

**ED Jobs, Title I, IDEA, Special Education, Perkins and other
NCLB Titles reviewed**

ED Jobs Consolidated Monitoring

All 90 ARRA Monitoring visits are completed and posted on the NJDOE Web Site

<http://www.state.nj.us/education/arra/resources/monitor/>

Ed Jobs Monitoring

<http://www.state.nj.us/education/finance/jobs/monitor/>

Before We Get into Details

The following information is being provided as an outreach for the US Department of Education, Office of The Inspector General, as to what can go wrong with grants in the worse case scenarios

USDE OIG Hotline

- Anyone suspecting fraud, waste or abuse involving Department of Education funds or programs should call or write the Inspector General's Hotline (choose the method of contact which best suits you):
- Send an email message to oig.hotline@ed.gov
- Call the OIG Hotline's toll free number 1-800-MIS-USED. The Hotline's operating hours are Monday, Wednesday and Friday 9:00 AM until 11:00 AM, Eastern Time; Tuesday and Thursday, 1:00 PM until 3:00 PM, Eastern Time except for holidays.
- To ensure complete anonymity, download a hardcopy of [the special complaint form](#), complete, and mail to: **Inspector General's Hotline**
Office of Inspector General
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-1500



OIG Fraud News

It really does happen

New Jersey—Four Sentenced for Stealing Funds from a Student Government Organization

A former office manager for the New Jersey City University Student Government Organization, her husband, and two associates were sentenced for embezzling more than \$500,000 from the organization. Between 2007 and 2010, the former Employee issued more than 200 checks from a Student Government Organization bank account made payable to her husband and to the other scheme participants, which they used to purchase goods and services for their own benefit. The former office manager and her husband were sentenced to prison and were ordered to pay more than \$516,000 in restitution. The associates were each sentenced to probation and were ordered to pay restitution ranging from \$34,300 to \$59,000.



OIG Fraud News

It really does happen

Pennsylvania—Former School District Superintendent Pled Guilty to Theft

The former superintendent of the Glendale School District pled guilty to theft involving Department and E-Rate funds. The former official misapplied approximately \$49,600 from the Fund for the Improvement of Education grant and conspired with others to obtain and misapply more than \$414,400 in E-Rate funding.



OIG Fraud News

It really does happen

New Jersey—Two Former Executives of Athletic Equipment Company Charged with Extensive Fraud

The former Chief Executive Officer and Chief Financial Officer of Circle System Group were charged with perpetrating a long-running fraud scheme against schools in New Jersey and other States. Circle System Group was a sports equipment and reconditioning company that provides services to school districts, colleges, universities, and professional sports teams nationwide. The two officials allegedly submitted hundreds of fraudulent invoices and other paperwork to schools, sometimes with the knowledge of school purchasing officials, and routinely double-billed schools in an effort to increase Circle System Group sales and revenue. As a result of the double-billing, Circle System Group allegedly received more than \$970,000.



OIG Fraud News

It really does happen

FORMER CEO OF CHARTER SCHOOL SENTENCED TO 37 MONTHS ON FRAUD, THEFT AND TAX CHARGES

In July 2009, O'Shea entered a guilty plea admitting that he stole between \$400,000 and \$1 million from PACS by: (1) using approximately \$710,000 in PACS' funds to purchase a building in the name of his purported non-profit business; (2) demanding kickbacks from PACS vendors; (3) submitting for reimbursement at least \$40,000 in fraudulent invoices for personal meals, entertainment, home improvements, and gas and telephone bills; (4) having approximately \$50,000 worth of home repairs improperly billed to PACS; (5) collecting approximately \$34,000 in rent from entities using PACS facilities; and (6) hiring a computer firm in an attempt to destroy computer evidence to obstruct this investigation. O'Shea also admitted to filing a false tax return for 2006.

OIG Fraud News

It really does happen

According to the documents filed today in court, **THOMPSON** was employed at Langston Hughes Academy Charter School as the Business and Human Resources Manager/Financial Manager beginning approximately July 1, 2008 until approximately November 6, 2009. **THOMPSON** admitted that in her position at Langston Hughes Academy Charter School, she would make cash withdrawals while acting in her capacity as Business and Human Resources Manager/Financial Manager and then manipulated the school's record in order to conceal the thefts. The amount of loss to Langston Hughes Academy Charter School is approximately \$660,000.

Common Issues and Resolutions Summary

- Financial Management, Procurement and EDGAR 80.36
- Time Sheets
- Equipment
- Non Allowable Uses of Funds
- Lack of Identified Programs
- Lack of Non Public Consultations (IDEA and Title I)
- Administrative Letter Requirements or Program Requirements

System Requirements for LEAs

EDGAR §§ 80.20 & 80.36

Financial Management=80.20

- 7 Key components
 - Financial Reporting (Ability to Report)
 - Accounting Records
 - Internal Controls
 - Budget Controls
 - Allowable Costs
 - Source Documentation
 - Cash Management

System Requirements for LEAs

EDGAR §§ 80.20 & 80.36

- Procurement=80.36
 - Open competition
 - Cost/Price Analysis
 - Vendor Selection
 - Contract Administration
 - See Local Finance Notice LFN 2010-3 (1/15/2010), Section I, J and K

Time Sheets, PARs, Funded Staff, etc

- VERY IMPORTANT to Understand
- Need to Show
 - What they are doing (e.g.: In Class Support)
 - Where they are doing it (e.g.: Room or Ms. Jones Class)
 - When they are doing it (e.g.: Time Schedule)
- See New Model from USDE

OIG Time and Effort Findings

- 2006 – Columbus - \$2.3 million
- 2008 – Detroit - \$49 million
- 2009 – Houston - \$238 million
- 2010 – Philadelphia - \$123 million

Staff Funding

What should be in my Board minutes?

Appointment of Teachers

- ❖ Name
- ❖ Salary
- ❖ School
- ❖ Funding Percentage for Each Program

Appointment of Secretaries, Aides, Program Directors, etc.

- ❖ Name
- ❖ Salary
- ❖ Work Location
- ❖ Funding Percentage for Each Program

Staff Funding and Time Sheets

Fully-funded Salaries

Applies to all Fund 20 Federal Grants

- Periodic certification signed at least semi-annually
- Clarification on Funding vs Cost Objective – UGH !!!!!!!
- Signed by employee and supervisor



Staff Funding and Time Sheets

Multiple Cost Objectives or Split-funded Salaries

- Personnel activity reports
- Signed by employee and supervisor
- Must be an after-the-fact distribution of actual activity
- Prepared at least monthly and must coincide with pay periods



What is a Cost Objective ?

A-87 Definition: A function, organizational subdivision, contract, grant or other cost activity for which cost data are needed and for which costs are incurred.

Select Expenditures and Support Needed

Equipment

- Maintain master inventory listing
 - ❖ **Date, Serial Number, Model, Cost, Location**
- Each school should maintain subsidiary listing
- All equipment should be labeled with Grant Name or equivalent tracking system
- Need to keep records for FIVE years past disposition (date needs to be on master list)
- Even if not equipment for GRANT purposes, if district has a lower threshold, then tracking of equipment is required
- **If less expensive to inventory than to replace, it should be inventoried**

Non-Allowable Uses or What is Allowable

- OMB Circular A-87, Attachment B
- Supplanting
- Schoolwide – Is it in the Plan ?

Selected Items of Cost

- Special rules for specific expenses
- Still subject to basic guidelines
- Examples:
 - **Alcohol**: Never allowable
 - **Salaries and Wages**: Allowable if time distribution
 - **Meetings and conferences**: Allowable if dissemination of technical information
 - Entertainment !!!!!!!!!!!



Non-Allowable Uses or What is Allowable

OMB Circular A-87, Attachment B

www.whitehouse.gov/omb/circulars/a087/a087_2004.pdf

- **1 – Advertising**
- **14 – Entertainment**

Non-Allowable Uses or What is Allowable

Advertising

- *Advertising and public relations costs.*
- The term advertising costs means the costs of advertising media and corollary administrative costs.

Advertising media include magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals, and the like.

- The term public relations includes community relations and means those activities dedicated to maintaining the image of the governmental unit or maintaining or promoting understanding and favorable relations with the community or public at large or any segment of the public.
- The only allowable advertising costs are those which are solely for:
 - (1) The recruitment of personnel required for the performance by the governmental unit of obligations arising under a Federal award ;
 - (2) The procurement of goods and services for the performance of a Federal award;
 - (3) The disposal of scrap or surplus materials acquired in the performance of a Federal award except when governmental units are reimbursed for disposal costs at a predetermined amount; or
 - (4) Other specific purposes necessary to meet the requirements of the Federal award.

Non-Allowable Uses or What is Allowable

Entertainment (14)

Costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities) are unallowable.

Select Expenditures and Support Needed

General Purchases

- Must have purchase orders
- Must have account number on P.O.
- Should indicate Grant on P.O. (Not Just Account #)
- Signed by Business Administrator
- If split P.O., Title I should be easily identifiable

REMEMBER Title I – Money spent in Individual Schools should EQUAL amount in Step 4 of Eligibility

| Reserves | Public | Private | Total |
|--|---------------|----------------|--------------|
| Administration | 0 | | 0 |
| Preschool Programs | 0 | | 0 |
| Homeless Students | 0 | | 0 |
| District-wide Instructional Programs | 0 | 0 | 0 |
| LEA Professional Development | 36772 | 508 | 37280 |
| LEA Parent Involvement | 7354 | 102 | 7456 |
| Public School Transportation for Schools in Need of Improvement | 37524 | | 37524 |
| Supplemental Educational Services for Schools in Need of Improvement | 111595 | | 111595 |
| Teacher Incentives and Rewards for SINI (5% maximum) | 0 | | 0 |
| Professional Development for Districts in Need of Improvement | 37882 | | 37882 |
| Neglected | 0 | | 0 |
| Delinquent | 0 | | 0 |
| Total Reserves: | | | |
| Total Distribution Amount: | | | 513859 |
| Minimum Per-Pupil Amount | | | 0 |

Required Reserve Amounts

| | Public | Non Public | Total |
|---|-----------|------------|-----------|
| LEA Professional Development (5% minimum) | \$36,772 | \$508 | \$37,280 |
| LEA Parent Involvement(1% minimum)*^ | \$7,354 | \$102 | \$7,456 |
| Public School Transportation/SES for SINI (20% combined) | \$149,119 | | \$149,119 |
| Professional Development for DINI less SINI Reserve Total Below(10% minimum)* | \$7,893 | | \$7,893 |

| Attendance Areas | SW / TA | Not Served | SINI | Corrective Action | Public Low Income | NonPublic Low Income | Low Income Percent | Total Allocated | SINI Reserve Prof Dev* | Public Allocation | Per-Pupil Amount | NonPublic Allocation |
|-------------------------------|---------|--------------------------|------|-------------------|-------------------|----------------------|--------------------|-----------------|------------------------|-------------------|------------------|----------------------|
| 120 - DELAIR | TA | | N | N | 315 | 2 | 76.02 % | 51647 | \$ 0 | 51321 | \$163 | \$326 |
| 103 - CENTRAL | TA | <input type="checkbox"/> | N | N | 225 | 6 | 62.10 % | 37635 | \$ 0 | 36657 | \$163 | \$978 |
| 175 - PENNSAUKEN INTERMEDIATE | TA | <input type="checkbox"/> | Y | N | 510 | 6 | 58.37 % | 84068 | \$ 8309 | 83090 | \$163 | \$978 |
| 055 - HOWARD M PHIFER M S | TA | <input type="checkbox"/> | Y | Y | 537 | 10 | 57.16 % | 96691 | \$ 9492 | 94921 | \$177 | \$1,770 |
| 160 - LONGFELLOW | TA | <input type="checkbox"/> | N | N | 91 | 6 | 53.59 % | 15804 | \$ 0 | 14826 | \$163 | \$978 |
| 180 - ROOSEVELT | TA | <input type="checkbox"/> | N | N | 127 | 2 | 51.19 % | 21017 | \$ 0 | 20691 | \$163 | \$326 |
| 100 - BENJAMIN FRANKLIN | TA | <input type="checkbox"/> | N | N | 214 | 1 | 50.47 % | 35028 | \$ 0 | 34865 | \$163 | \$163 |
| 130 - G H CARSON | TA | <input type="checkbox"/> | N | N | 158 | 1 | 49.38 % | 25905 | \$ 0 | 25742 | \$163 | \$163 |
| 140 - GEORGE B. FINE | TA | <input type="checkbox"/> | N | N | 140 | 0 | 48.61 % | 22809 | \$ 0 | 22809 | \$163 | \$0 |
| 050 - PENNSAUKEN HIGH | TA | <input type="checkbox"/> | Y | Y | 794 | 9 | 45.86 % | 123255 | \$ 12188 | 121878 | \$153 | \$1,377 |
| Total Allocated | | | | | | | | \$513,859 | \$29,989 | \$506,800 | | \$7,059 |
| Difference | | | | | | | | \$0 | | | | |

*Restricted Reserves

^Must spend 95% of the Parent Involvement Reserve on school level activities.

Comments

Supplement Not Supplant

- Funds must be “supplemental” to local spending

- Supplemental Defined:

“In the absence of federal funds, would funds have been spent (prior year funding is one distinguishing factor)”

Supplement Not Supplant

- If all students/classroom get items, district can't pay for Title I / IDEA part out of grant
- Items purchased should not be used by non-eligible students (can have some incidental benefit, but need to document)
- Presentations/Trips should not benefit non-eligible students (identify Title I and in IEP for IDEA)
- Special rules apply to approved and implemented "Schoolwide Programs"

Helpful Questions to Ask When Analyzing Costs

- Is the proposed cost consistent with federal cost principles? OMB A-87, Attachment B
- Is the proposed cost allowable under the relevant program? (Title I, IDEA, etc)
- Is the proposed cost consistent with an approved program plan and budget? (EWEG)
- Is the proposed cost consistent with program specific fiscal rules? (Supplement not Supplant)
- Is the proposed cost consistent with EDGAR?

Allowable Costs

All Costs must be:

- Necessary
- Reasonable
- Allocable
- Legal under state and local law (A5)



Allowable Costs

- Must be necessary for the performance or administration of the grant
- Must follow sound business practices:
 - *Arms length bargaining (hint: procurement processes)*
 - *Follow federal, state and local laws*
 - *Follow terms of the grant award*

Schoolwide Program & Expenses

- MUST have approved plan that addresses all schoolwide issues
- Time sheets are required
- Key questions to be addressed:
 - *Do the activities budgeted support the intent of the law?* [Federal Register: July 2, 2004 (Volume 69, Number 127)]
 - *Are supplemental services provided to the students enrolled in the school?*

Lack of Identified Funded Programs

- We know that the grants do not cover 100% of the necessary programs
- Programs for Title I must be clear and distinct
- Programs for Title I must be the “icing on the cake” for low performing students
- Watch for funded programs that
 - Are replacement programs (in lieu of math or English)
 - Pull children away from elective classes

Closing Out the Grants

- Must be consistent with budget (amendments filed through EWEG) – EWEG Monitors
- **CANNOT:**
 - Move more than 10% of **total funds** without State approval (EWEG amendment) - \$50K threshold removed
 - Add a budget category without State approval (EWEG Amendment)
 - Transfers to and from Equipment Lines
 - Carryover more than 15% of Title I **total amount** received more than once every three years without State approval (Must have good reason)

Watch Transfers

- Must be able to state WHY transfer and how not SUPPLANTING
- Transfers:
 - Just can't move expenses to "Use up leftover money"
 - Make sure consistent with program plans
 - Can't move ½ a chair

Other Important Fiscal Considerations

Carryover

- Oldest money automatically used first!!!!
- Make sure Auditors know so Due to Grantor is not in CAFR, Schedule of Federal Expenditures – started with 2005-2006 Carryover into 2006-2007

Fiscal News from Washington

*New Haven Audit Report from Office of
Inspector General*

Supplanting in a Schoolwide Program

<http://www.ed.gov/about/offices/list/oig/auditreports/a02f0005.pdf>

Fiscal News from Washington

William Floyd Audit Report from Office of Inspector General

- Unsupported Expenses
- Unsupported Adjusting Journal Entries
- Supplanting of Textbooks
- Weak Internal Controls

<http://www.ed.gov/about/offices/list/oig/auditreports/a02f0030.pdf>

Fiscal News from Washington

City of Detroit and Parent Involvement Fund 2005

- Disallowed Charges for Entertainment, Promotional Items and Public Relations
- Need to be necessary, reasonable, allocable and documented
- Disallowed items include advertising for an event and live musical entertainment at parent volunteer function

<http://www.ed.gov/about/offices/list/oig/auditreports/a05f0018.pdf>

Fiscal News from Washington

City of Detroit -Revisit in 2008

- Over \$131 Million in 2005 and \$126 Million in 2006
- No Time Sheets – Almost \$50 Million
- Teaching non-Title I students – even though most of Detroit is schoolwide some schools are not (no plan submitted) and OIG looked to these schools and found staff being funded that were teaching non-Title I identified students. Detroit argued they could have been schoolwide if they did a plan and the OIG rejected this argument
- Over \$21 M for adjusting entries for employees that were charged to other programs and then charged to Title I
- Gift cards they could not show got to students
- \$150,000 for martial arts training

Fiscal News from Washington

St. Louis OIG Audit

- Lost 125 Computers
- Serving Ineligible Schools
- <http://www.ed.gov/about/offices/list/oig/areports.html>

Fiscal News from Washington

Philadelphia

- Findings totaling \$138,376,068
- Unsupported Salaries (some direct and some thru adjusting entries)
- School Police paid from Title I Funds
- Supplanting (moving company, etc)
- No backup for School Choice Charges of \$1.3M
- Weak internal controls

Available Research & Where to Find It

- No Child Left Behind
www.ed.gov/legislation/ESEA02/index.html
- Individuals with Disabilities Education Act
<http://idea.ed.gov/explore/view/p/%2Croot%2Cstatute%2C>
<http://idea.ed.gov/explore/view/p/%2Croot%2Cregs%2C>
- NJ DOE ARRA Site
<http://www.state.nj.us/education/arra/>
- OMB Circular A-87, Attachment B
www.whitehouse.gov/omb/circulars/a087/a087_2004.pdf
- EDGAR
<http://www.ed.gov/policy/fund/reg/edgarReg/edgar.html>
- Compliance Supplement (A-133)
http://www.whitehouse.gov/omb/circulars/a133/compliance_08_08toc/

Conclusion

Remember:

- *“If the district takes the money, they are responsible for knowing the rules and regulations concerning the grant.”*
- If you need further help contact Anthony Hearn
 - (609) 633-2492
 - anthony.hearn@doe.state.nj.us