

District Coordinator Handbook for Title II, Part A Supporting Effective Instruction

Office of Teaching and Learning
Division of Academic Program Standards



Kentucky Department of
E D U C A T I O N

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Purpose and Overview of Title II, Part A

Title II, Part A is a U.S. Department of Education (ED) grant program that provides [supplemental](#) funding to help support effective instruction. ED awards Title II, Part A funds to state educational agencies (SEAs), which then subgrant funds to districts.

In general, Title II, Part A funds can be used to provide **supplemental** activities that strengthen the quality and effectiveness of teachers, principals, and other school leaders. The purpose of Title II, Part A is to:

- Increase student achievement consistent with challenging state standards,
- Improve the quality and effectiveness of teachers, principals, and other school leaders,
- Increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools, and
- Provide low-income and minority students greater access to effective teachers, principals, and other school leaders.

Districts can use Title II, Part A funds for a wide range of activities to support the quality and effectiveness of teachers, principals and other school staff.

Activities supported with Title II, Part A funds must:

- Be consistent with Title II, Part A's purpose,
- Address the learning needs of all students, including children with disabilities, English learners, and gifted and talented, and
- Supplement, not supplant, non-Federal funds that would otherwise be used for activities.

Districts must prioritize Title II, Part A funds and services to schools that:

- Are implementing comprehensive support and improvement (CSI) activities and targeted support and improvement activities (TSI), and
- Have the highest percentage of poverty students according to the Title I formula.

The purpose of this handbook is to complement [Sections 2001-2104](#) of the Every Student Succeeds Act (ESSA), [Education Department General Administrative Regulations \(EDGAR\)](#), [Uniform Grant Guidance \(UGG\)](#), and the following non-regulatory guidance documents issued by the U.S. Department of Education (USDE):

- [Building Systems of Support for Excellent Teaching and Learning](#) and
- [Fiscal Changes and Equitable Services Requirements Under the Elementary and Secondary Education Act of 1965 \(ESEA\), as Amended by the Every Student Succeeds Act \(ESSA\)](#).

Additional resources can be found on the [Title II, Part A webpage](#). If you have questions, feel free to contact [your KDE program consultant](#).

Proposed Timeline of Activities

This timeline serves as an example of activities that must occur through the year. It may be revised to meet your district's needs.

Suggested timeframe	Corresponding activity
January - February	<ul style="list-style-type: none"> • Begin to develop a district needs assessment based on review of CSIPs/CDIP, consultation with shareholders (educators, parents and community members), and review of other data sources in order to identify professional learning, class size reduction, and recruiting/retention needs. • Review the Census population estimates to determine the potential effects on allocations. These are usually released through the Commissioner's Monday email. • KDE consolidated monitoring begins.
March – April	<ul style="list-style-type: none"> • Send participation letters to all non-public schools, including home schools, within the district boundaries. • Conduct consultation with participating non-public school staff regarding their professional learning needs and the Title II, Part A allocation. Provide participating NPSs with district complaint and equipment retrieval procedures. • KDE consolidated monitoring continues.
May - June	<ul style="list-style-type: none"> • Complete and submit the Title II, Part A budget within GMAP based on the tentative amounts.
July	<ul style="list-style-type: none"> • Districts with approved consolidated applications may begin spending new fiscal year funds on July 1. Funds allocated for the new fiscal year may not be spent for activities that occur prior to July 1, even if the district's application is approved. This spending requirement cannot be waived.
August - September	<ul style="list-style-type: none"> • Send a letter to all parents about their right to request and receive information on the qualifications of their children's teachers. This may be included in the student handbook. This is also a requirement for Title I and the information for both programs may be sent jointly. • If applicable, send a letter to all parents whose child has received instruction for four or more weeks by an emergency or out-of-field certified teacher. Monitoring of this should be ongoing; if at any time during the school year instruction is provided for four or more weeks by an emergency certified or out-of-field teacher, parents must be notified. • Begin Title II, Part A services to non-public schools.
October	<ul style="list-style-type: none"> • Final allocations are released by the federal government and districts are notified. A revised Title II, Part A budget is submitted to KDE for approval through GMAP.
November - December	<ul style="list-style-type: none"> • KDE Title II, Part A desk monitoring begins.

Fiscal and Programmatic Requirements

How Title II, Part A Funds are Distributed to States and Districts

How the Federal Government to State Formula Changes

ESSA changes the way states receive Title II, Part A funds from the federal government (the funding formula) in two ways. First, states' hold harmless amounts will be gradually eliminated over the next few years (a hold harmless is essentially a guarantee of a certain minimum amount of funding). The state hold harmless will be completely eliminated as reflected below, and instead Title II, Part A funds will be distributed to states solely based on population and poverty counts. Second, the way population and poverty counts are factored into the state formula is changing. Currently, states generate Title II, Part A funds 35% based on population and 65% based on poverty. Under ESSA those percentages are shifting between 2018 and 2020 until it is 20% based on population and 80% based on poverty – in essence allocating additional funds to states with greater poverty. The chart below gives a breakdown of what the changes look like over the next few years.

Reduction of States' Hold Harmless		Changes to the Distribution of Remaining Funds	
School year	% Hold Harmless Guaranteed	School Year	Distribution Based on Child Counts 5-17/5-17 Poverty
2017-18	85.71%	2017-18	35%/65%
2018-19	71.42%	2018-19	30%/70%
2019-20	57.13%	2019-20	25%/75%
2020-21	42.84%	2020-21	20%/80%
2021-22	28.55%	2021-22	20%/80%
2022-23	14.26%	2022-23	20%/80%
2023-24	0%	2023-24	20%/80%

Notes

- 1. Reduction of States' Hold Harmless:** The percentage reported represents the amount of hold harmless funds a state would be eligible for each year as compared to the amount of hold harmless received in school year 2016-17. In 2023 states will no longer be eligible for hold harmless amounts, and funds will be distributed based on child counts solely.
- 2. Change to the Distribution of Remaining Funds:** The percentages reported represent how remaining funds will be distributed based on child count estimates. In 2017, for example, 35% of remaining funds were distributed based on states' estimates of children aged 5-17 and 65% were distributed based on estimates of children aged 5-17 in poverty. The distribution percentages change, increasing the amount of funds distributed based on poverty, over the next few years.

How the State to District Formula Changes

States are required to subgrant Title II, Part A funds to districts based on a formula. ESSA changes this state to district funding formula, by eliminating hold harmless amounts. Starting with the 2017-18 school year, funds are distributed solely based on estimates of child counts within their district boundaries. Districts receive 20% of their Title II, Part A funds based on estimates of the number of children aged 5-17 and 80% based on estimates of the number of children aged 5-17 in poverty. The steps below outline the formula process for distributing funds to districts.

1. Available amount for state = (state hold harmless amount) – (reduction in Kentucky’s hold harmless guarantee)
2. Available amount for districts = (Available amount for state) – (5% for state activities)
3. 20% PPA = (20% of amount available for districts) ÷ (state 5-17 child count)
4. 80% PPA = (80% of amount available for districts) ÷ (state 5-17 poverty child count)
5. Multiply each PPA by each district’s applicable child count
6. District total allocation = (20% amount) + (80% amount)

Period of Availability for Title II, Part A Funds

Title II, Part A is “forward funded.” The first day that the Department may award funds for obligation to States with approved plans is July 1 following the appropriation. The Department tries to make funds available as close to that date as possible. Funds remain available for obligation, whether they are available to the State, the LEAs, or the SAHE, for a period of 27 months after July 1. This 27-month period includes an initial 15-month period of availability and an automatic 12-month extension permitted under the “Tydings Amendment.” As an example, funds appropriated for Federal fiscal year (FY) 2015 first became available to the States on July 1, 2015, and remain available for obligation through September 30, 2017.

When the period of availability for obligations ends, grantees may not incur any further obligations, but they do have an additional 90-day liquidation period during which all outstanding obligations must be paid. Continuing the example above, FY 2015 funds can be drawn down and spent through December 31, 2017, to cover remaining unpaid obligations. On January 1, 2018, the Department will make the account unavailable for further transactions.

Requirement for Shareholder Consultation When Deciding How to Use Local Title II, Part A Funds

Title II, Part A requires districts to consult meaningfully with a wide array of [shareholders](#) (educators, parents and community members) on the LEA’s plan for carrying out Title II, Part A funded activities. Districts must also conduct ongoing consultation with those shareholders to update and improve activities supported with Title II, Part A funds.

In carrying out consultation, USDE and KDE recommend that Districts consider the following activities:

- Conduct outreach to and solicit input from relevant shareholders during the design and development of plans for Title II, Part A funds ensuring there is a diverse representation of educators from across the LEA, especially those who work in high-need schools and in early education;
- Seek out diverse perspectives within shareholder groups, when possible, and ensure that consultation is representative of the LEA as much as possible;

- Be flexible when consulting with shareholders, especially educators, by holding meetings or conferences outside the hours of the school day or by using a variety of communications tools, such as electronic surveys, emails or virtual meetings;
- Make shareholders aware of past and current uses of Title II, Part A funds, and research or analysis of the effectiveness of those uses, if available, as well as research or analysis of proposed new uses of funds, in order to consider the best uses for schools and districts to support teacher and school leader development; and
- Consider the concerns identified during consultation, and revise uses of Title II, Part A funds when appropriate.

Needs Assessment

The purpose of the needs assessment is to determine the current needs of the LEA's teaching force in order to be able to have all students meeting challenging State content and academic achievement standards. An LEA may want to use information such as student achievement data, **CSIP information**, CDIP information, information about the numbers of teachers (disaggregated by subject taught and grade level) who lack full teacher certification or licensure, assessments by administrators and mentor teachers who evaluate teacher and student performance, and teacher self-evaluations.

The LEA should use the needs assessment to identify local teacher effectiveness needs. Among other things, the assessment should identify those needs that must be addressed if the LEA does not have all teachers certified. The assessment should take into account:

- Activities that the LEA must conduct in order to give teachers the means to provide all students with the opportunity to meet challenging State content and academic achievement standards, and
- Activities that the LEA needs to conduct in order to give principals the instructional leadership skills to help teachers provide all students with the opportunity to meet challenging State content and academic achievement standards [Section 2122(c)(2)].

A needs assessment also identifies those areas that an LEA should strengthen, such as areas of weakness in student academic achievement, as part of a meaningful plan for professional development and hiring. The LEA uses the results of this assessment to plan Title II, Part A activities, keeping in mind student achievement goals and a plan for ensuring that all teachers in core academic areas meet certification requirements.

The LEA must carry out the needs assessment with the involvement of the district's teachers, including those in schools receiving assistance under the Title I, Part A program. A needs assessment planning tool can be found in the appendix.

Law provides that the LEA's needs assessment "shall take into account the activities that need to be conducted in order to give teachers the means, including subject-matter knowledge and teaching skills, and to give principals the instructional leadership skills to help teachers to provide students with the opportunity to meet challenging State and local student academic achievement standards" [Section 2122(c)(2)]. However, the law does not prescribe the data an

LEA must use in conducting its needs assessment. The data necessary for determining teacher needs might include:

- Student achievement data,
- Comprehensive school improvement plans (CSIP),
- Comprehensive district improvement plan (CDIP),
- Information on national and State initiatives,
- Projections of the professional development necessary to ensure that all teachers of core academic subjects meeting certified requirements,
- Evidence-based research on proposed programs and strategies,
- Projections of teacher supply in critical areas,
- Student enrollment data,
- Program assessment data, and
- Community, business, and parental input.

Allowable District Uses of Local Title II, Part A Funds

Districts are encouraged to prioritize activities that will have the highest impact on teaching and learning. When determining which of the many allowable Title II, Part A strategies and activities will have the highest impact, USDE guidance suggests districts undertake a five-step framework:

1. Choose interventions aligned with identified **local needs**,
2. Consider the **evidence base** and the local capacity when selecting a strategy,
3. Develop a robust **implementation plan**,
4. Provide adequate **resources** so the implementation is well-supported, and
5. Gather information regularly to examine the strategy and to **reflect** on and inform next steps.

Districts must use data and ongoing shareholder consultation to continually update and improve Title II, Part A-supported activities.

All uses of federal funds must meet the **identified and documented** needs of the district. Be sure that all funded activities are **reasonable, allocable, necessary, and documented**.

Although the following examples present an overview of Title II, Part A spending options, they do not represent an all-encompassing list of allowable activities. Please consult [your KDE program consultant](#) if you have questions.

1. Evaluation and Support Systems

Districts may use Title II funds to provide **supplemental** professional learning on the effective use and implementation of the district developed evaluation and support systems that meet Senate Bill 1 requirements for teachers, principals, or other school leaders.

Costs related to principal observation calibration through systems similar to Frontline may be allowable uses of funds if **supplemental** to required professional learning hours. Costs related to the collection and analysis of data is generally not an allowable use of Title II, Part A funds.

2. Recruiting, Hiring, and Retaining Effective Teachers

Districts may use Title II funds to develop and implement initiatives to recruit, hire, and retain effective teachers to improve the equitable distribution of teachers, particularly in low-income schools with high percentages of ineffective teachers and high percentages of students who do not meet state standards. Districts may also use Title II funds to implement supports for principals and other school leaders.

This can include:

- Expert help in screening candidates and enabling early hiring, Note: Purchasing recruitment systems such as TalentEd would not be allowable because they perform activities a district would be required to conduct in the absence of federal funds.
- Differential and incentive pay for teachers, principals, or other school leaders in high-need academic subject areas and specialty areas, which may include performance-based pay systems, Note: incentive pay must be necessary and reasonable given a district's specific needs and a process for distributing these funds must be documented in board policy.
- Teacher, paraprofessional, principal, or other school leader advancement and professional growth, which, according to USDE guidance can include creating hybrid roles that allow teachers to provide instructional coaching to colleagues while remaining in the classroom, as well as other responsibilities such as collaborating with administrators to develop and implement distributive leadership models and leading decision-making groups,
- Create incentives for effective educators to teach in high-need schools, and ongoing incentives for such educators to remain and grow in such schools.
- New teacher, principal, or other school leader induction and mentoring programs, such as, a) providing for a program requiring all beginning teachers and principals receive induction support during their first two years and b) supporting a program requiring regular observation by mentors/induction coaches and opportunities for new teachers to observe classrooms, and
- Development and provision of training for school leaders, coaches, mentors, and evaluators on how to effectively differentiate performance, provide useful feedback, and use evaluation results to inform decision-making about professional learning, improvement strategies, and personnel decisions.
- Establishment of a system whereby teachers could opt to pursue various career paths such as, a) become a career teacher and stay in the classroom, b) become a

mentor teacher, stay in the classroom but take on additional duties such as mentoring first-year teachers and receive additional pay for these duties and c) become an exemplary teacher, based on a distinguished record of increasing student academic achievement, and train other teachers to do the same while receiving additional pay for these duties.

- Instill a strong commitment to professionalism among teachers, principals, and other school and district staff and actively promote the importance of strong school leaders.
- An LEA may use Title II Part A funds for programs to recruit and retain pupil services personnel (e.g. guidance counselors) if the LEA is making progress toward meeting the annual measurable objectives described in Title I, section 1119(a)(2) of ESEA and in a manner consistent with mechanisms to assist schools in effectively recruiting and retaining highly qualified teachers and principals.
- **Note: Title II, Part A funds for recruitment cannot supplant general recruitment activities and expenditures such as recruiting-related pamphlets, materials and supplies. Additionally, items such as recruiting banners and items for giveaways at recruiting fairs would not meet the reasonable and necessary requirements.**

Examples: Teacher Recruitment and Retention

Title II, Part A funds may be used by Districts for the following strategies:

- Pay for travel expenses related to recruiting educators from surrounding areas;
- Relocation costs for highly effective teachers being recruited to high needs areas;
- Building in leadership and growth opportunities for high quality teachers that do not remove them from the classroom;
- Offering career advancement opportunities for current staff members, such as paraprofessionals, who have worked in the community for an extended period of time, to support their efforts to gain the requisite credentials to become classroom instructors;
- Providing ongoing professional development aimed at cultural competency and responsiveness and equity coaching, designed to improve conditions for all educators and students, including educators and students from underrepresented minority groups, diverse national origins, English language competencies, and varying genders and sexual orientations;
- Providing time and space for differentiated support for all teachers, including affinity group support and
- Supporting leadership and advancement programs aimed to improve career and retention outcomes for all educators, including educators from underrepresented minority groups.

3. Recruiting from Other Fields

Districts may use Title II funds to recruit qualified individuals from other fields to become teachers, principals, or other school leaders. Qualified individuals from other fields include mid-career professionals from other occupations, former military personnel, and recent graduates of institutions of higher education with records of academic distinction who demonstrate the potential to become effective teachers, principals or other school leaders. For additional information on alternative routes to teacher certification, visit the [Kentucky Education Professional Standards Board website](#).

4. Class Size Reduction

ESEA section 2103(b)(3)(D) permits LEAs to use Title II, Part A funds to reduce class size as one strategy to attract and retain effective educators in high-need schools. This requirement presumes that LEAs will not use Title II funds to hire or pay teachers for the purpose of class size reduction unless the LEA has previously determined the teachers to be effective. Districts may use Title II funds to reduce class size to a level that is evidence-based, to the extent the SEA (in consultation with Districts) determines such evidence is reasonably available. The district is responsible for evaluating the effectiveness of class size reduction and for maintaining documentation showing class size reduction positively affects student outcomes. [Class capacity size](#) must be met and evidence of a significant change in student/teacher ratio must be demonstrated before utilizing this strategy. Other approaches to reduce class size include but are not limited to:

- Having two certified teachers team teach in a single classroom for either part of the school day or the entire day
- Hiring an additional certified teacher for a grade level (e.g. providing three teachers for two 3rd grade classes) and dividing the students among the teachers for sustained periods of instruction each day in core academic subjects, such as reading and math
- Hiring an additional certified teacher who works with half of the students in a class for reading or math instruction, while the other half remains with the regular classroom teacher.

LEAs have the flexibility to explore these and other alternatives for reducing classes, provided the result is a meaningful reduction for all the students in the class on a regular basis. Research shows that “pull-out” programs involving reducing class size by only a handful of students, or sporadic reduction of class size, are less likely than other methods of class-size reduction to result in increased achievement for students.

5. Personalized Professional Learning

Districts may use Title II funds to provide high-quality, **supplemental**, personalized professional learning for teachers, instructional leadership teams, principals, or other school leaders. The professional learning must be evidence-based, to the extent the SEA (in consultation with districts) determines such evidence is reasonably available. The professional learning must also focus on improving teaching and student learning and

achievement, including, but not limited to, supporting efforts to train teachers, principals, or other school leaders how to:

- Effectively integrate technology into curricula and instruction (including education about the harms of copyright piracy),
- Use data to improve student achievement and understand how to ensure individual student privacy is protected,
- Effectively engage parents, families, and community partners, and coordinate services between school and community,
- Help all students develop the skills essential for learning readiness and academic success,
- Develop policy with school, LEA, community, or state leaders, and
- Participate in opportunities for experiential learning through observation.

Title II, Part A funds may be used to purchase materials and supplies used in professional development activities, including materials that a teacher will need in order to apply the professional development in a classroom setting, as long as these materials are **reasonable and necessary** to carry out the activities. Program funds cannot be used, however, to purchase materials and supplies that, although they may benefit students, are not directly connected to the teachers' professional development.

Additional information and guidance on standards can be found on the [Kentucky Department of Education Professional Learning page](#).

Personalized Professional Learning Examples

According to USDE guidance, among other activities, districts may use Title II funds for:

- Peer-led, evidence-based professional learning in Districts and schools;
- Community of learning opportunities and other professional learning opportunities with diverse shareholder groups such as parents, civil rights groups, and administrators, to positively impact student outcomes; for example, through a forum to discuss the implications of a policy or practice on a school community, or organizing a community-wide service learning project, where teachers work together afterwards to incorporate lessons learned into their teaching;
- Community of learning opportunities where principals and other school leaders engage in professional learning with their school teams to fully develop broad curriculum models;
- Opportunities for principals and other school leaders to collaborate, problem-solve, and share best practices;
- "Teacher time banks" to allow effective teachers and school leaders in high-need schools to work together to identify and implement meaningful activities to support teaching and learning (for example, when implementing teacher time banks, Title II funds may be used to pay the costs of additional responsibilities for teacher leaders, use of common planning time, use of teacher-led developmental experiences for other educators based on educators' assessment of the highest leverage activities, and other professional learning opportunities); and
- Ongoing cultural proficiency training to support stronger school climate for educators and students.

6. Increasing Teacher Effectiveness for Students with Disabilities and English Learners

Districts may use Title II to provide **supplemental** professional learning that increases teachers' ability to effectively teach children with disabilities and English learners, which may include the use of multi-tiered systems of support and positive behavioral intervention and supports. This type of training must be **supplemental** to Kentucky's requirements.

7. Supporting Early Education

Districts may use Title II funds to provide programs and activities to increase the knowledge base of teachers, principals, or other school leaders on instruction in the early grades and on strategies to measure whether young children are progressing.

Districts may also use Title II funds to provide programs and activities to increase the ability of principals or other school leaders to support teachers, teacher leaders, early childhood educators, and other professionals to meet the needs of students through age eight, which may include providing joint professional learning and planning activities for school staff and educators in preschool programs that address the transition to elementary school.

Supporting Early Education Strategies

Recommended Strategies. Title II, Part A funds may be used by Districts for the following strategies:

- Joint professional learning and planned activities designed to increase the ability of principals or other school leaders to support teachers, teacher leaders, early childhood educators, and other professionals to meet the needs of students through age eight. The National Academy of Medicine's [Transforming the Workforce for Children Birth through Age 8: A Unifying Foundation](#) offers recommendations to build a workforce that is unified by the foundation of the science of child development and early learning and the shared knowledge and competencies that are needed to provide consistent, high-quality support for the development and early learning of children from birth through age eight;
- Providing programs and activities to increase the knowledge base of teachers, principals, or other school leaders regarding instruction in the early grades and developmentally appropriate strategies to measure how young children are progressing. [Leading Pre-K-3 Learning Communities: Competencies for Effective Principal Practice \(Executive Summary\)](#), from the National Association of Elementary School Principals, defines new competencies, and outlines a practical approach to high-quality early childhood education that is critical to laying a strong foundation for learning for young children from age three to third grade.;
- Training on the identification of students who are gifted and talented and implementing instructional practices that support the education of such students, including early entrance to kindergarten.

8. Supporting Effective Use of Assessments

Districts may use Title II funds to provide **supplemental** training, technical assistance, and capacity-building to assist teachers, principals, or other school leaders with selecting and implementing formative assessments, designing classroom-based assessments, and using data from such assessments to improve instruction and student academic achievement, which may include providing additional time for teachers to review student data and respond, as appropriate. Professional learning should be ongoing, but funding cannot be used to pay for professional learning that is identical to what has been offered in the past unless it serves different participants (i.e. new teachers). Remember that all Title II, Part A funds should be used for training that is above and beyond district requirements or for teachers needing additional support.

9. Supporting Awareness and Treatment of Trauma and Mental Illness

Districts may use Title II funds to carry out **supplemental** professional learning for school personnel in:

- The techniques and supports needed to help educators understand when and how to refer students affected by trauma, and children with, or at risk of, mental illness,
- The use of referral mechanisms that effectively link such children to appropriate treatment and intervention services in the school and in the community, where appropriate,
- Forming partnerships between school-based mental health programs and public or private mental health organizations, and
- Addressing issues related to school conditions for student learning, such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism.

The Kentucky Department of Education among other organizations offers a Mental Health First Aid training to districts and community organizations. To find an upcoming class visit the [Mental Health First Aid](#) website and search for upcoming courses near you.

10. Supporting Gifted and Talented Students

Districts may use Title II funds to provide **supplemental** training to support the identification of students who are gifted and talented, including high-ability students who have not been formally identified for gifted education services, and implementing instructional practices that support the education of such students, such as:

- Early entrance to kindergarten,
- Enrichment, acceleration, and curriculum compacting activities (techniques relating to differentiated instruction), and
- Dual or concurrent enrollment programs in secondary school and postsecondary education.

11. School Library Programs

Districts may use Title II funds to provide **supplemental** professional learning that supports the instructional services provided by effective school library programs.

12. Preventing and Recognizing Child Sexual Abuse

Districts may use Title II funds to provide **supplemental** professional learning for all school personnel, including teachers, principals, other school leaders, specialized instructional support personnel, and paraprofessionals, regarding how to prevent and recognize child sexual abuse.

13. Supporting Science, Technology, Engineering, and Mathematics (STEM)

Districts may use Title II funds to develop and provide **supplemental** professional learning and other comprehensive systems of support for teachers, principals, or other school leaders to promote high-quality instruction and instructional leadership in science, technology, engineering, and mathematics subjects, including computer science.

14. Feedback Mechanisms to Improve School Working Conditions

Districts may use Title II funds to further seek feedback to improve school working conditions related to those conditions identified through the results of the Teaching, Empowering, Working Conditions, culture and perception surveys and other methods of analyzing working conditions.

15. Supporting Postsecondary and Workforce Readiness

Districts may spend Title II funds to provide **supplemental**, high-quality professional learning for teachers, principals, or other school leaders on effective strategies to integrate rigorous academic content, career and technical education, and work-based learning, which may include providing common planning time, to help prepare students for postsecondary education and the workforce.

16. Other Activities

Districts may also spend Title II funds on other activities that meet Title II purposes (see “Purpose of the Title II, Part A Program” above) and are evidence-based to the extent the SEA (in consultation with Districts) determines that such evidence is reasonably available.

Equitable Services

1. Determination of Funds Available for Equitable Services to Private Schools

Title II funds are subject to equitable services requirements, as detailed in Title VIII of ESSA. In short, this means Districts must reserve funds to provide Title II services to eligible private school teachers and other educational personnel. Funds must be used to provide needs-based, academic professional learning to teachers and administrators of participating private schools. Funds may not be used to provide for professional learning that is religious based.

ESSA changes the way Districts must reserve Title II funds for equitable services for private schools. Under NCLB, an LEA only had to reserve a share of the Title II, Part A money it spent on professional learning. Under ESSA, the reservation is now based on an LEA's entire Title II allocation. The following is an example from USDE's guidance about how to calculate the equitable services reservation for the district:

EXAMPLE OF FORMULA TO DETERMINE AMOUNT FOR TITLE II, PART A EQUITABLE EXPENDITURES	
A. Number of Students	
A1: LEA Enrollment	900
A2: Participating Private Schools Enrollment	100
A3: Total Enrollment = A1 + A2	1,000
B. Title II, Part A Allocation	
B1: Total LEA Allocation	\$1,000,000
B2: Administrative Costs (for public and private school programs)	\$50,000
B3: LEA Allocation Minus Admin Costs = B1-B2	\$950,000
C. Per Pupil Rate	
C1: B3 divided by A3	\$950
D. Equitable Services	
Amount LEA must reserve for equitable services for private school teachers and other educational personnel = A2 x C1	\$95,000 ¹

The LEAs must administer and retain control over the funds and, therefore, **may not provide program funds directly to private schools**. Before determining the amount of funds to be provided for services to private school teachers, an LEA could pay reasonable and necessary administrative costs of providing those services from its Title II Part A allocation.

The LEA must provide equitable services based on the number of students who are enrolled in participating private schools in the geographical area served by the school district regardless of where the students live.

¹ See [ED 2016 Fiscal Changes Guidance](#), Q&A P-2.

2. Consultation

Districts are required to consult with at least one official from each private school. Although the district is required to maintain fiscal and programmatic control when providing Title II, Part A services to private schools, consultation offers a method of determining needs and provides a platform for each entity to voice opinions and concerns and to agree about the services. **Consultation should be ongoing throughout the school year.** Consultation topics should include issues such as:

- How the children’s needs will be identified;
- What services will be offered;
- How, where, and by whom the services will be provided;
- How the services will be assessed and how the results of the assessment will be used to improve those services;
- The size and scope of the equitable services to be provided to the eligible private school children, teachers, and other educational personnel, the amount of funds available for those services, and how that amount is determined;
- How and when the agency, consortium, or entity will make decisions about the delivery of services, including a thorough consideration and analysis of the views of the private school officials on the provision of services through potential third-party providers; and
- Whether the agency, consortium, or entity shall provide services directly or through a separate government agency, consortium, or entity, or through a third-party contractor; and
- Whether to provide equitable services to eligible private school children—
 - by creating a pool or pools of funds with all the funds allocated under subsection (a)(4)(C) based on all the children from low-income families in a participating school attendance area who attend private schools; or
 - in the agency’s participating school attendance area who attend private schools with the proportion of funds allocated under subsection (a)(4)(C) based on the number of children from low-income families who attend private schools.

To ensure timely and meaningful consultation, an LEA must consult with appropriate private school officials during the design and development of the proposed programs. It is important that attention be given to the timing of the consultation so that decisions that affect the opportunities of eligible private school teachers to participate in Title II, Part A program activities are made only after discussions have taken place. The quality of the consultative process will likely have an effect on the quality of services to private school teachers.

To meet its general record-keeping responsibility, an LEA should document that: (a) representatives of private schools were informed of the availability of Title II Part A services; (b) the needs of private and public school teachers were identified as part of a district-wide needs assessment; (c) private school officials were consulted and provided an opportunity for input into the planning of the LEA’s program activities; and (d) the LEA designed a project that would permit their equitable participation.

The LEA also should maintain records of its efforts to resolve any complaints made by private school representatives regarding LEAs that should be serving their teachers are not doing so on an equitable basis.

3. State Equitable Services Ombudsman

To help ensure equitable services and other benefits for eligible private school children, teachers and other educational personnel, and families, a SEA must designate an ombudsman to monitor and enforce equitable services requirements under both Title I and Title VIII. KDE has designated a state ombudsman, who can be reached at KPSO@education.ky.gov.

Private school officials may file a complaint with the ombudsman if they believe adequate consultation has not occurred or if they believe services are not equitable. In this case, the complainant would send an email with electronic signature to the address above stating the nature of the complaint. The ombudsman would have 45 days from receipt to complete an investigation and issue a decision. A private school official may appeal the KDE decision to the U.S. Secretary of Education within 30 days of issuance. The Secretary must investigate and resolve the appeal within 90 days of its receipt.

4. Private School Participation

Institutions considered “private schools” are nonprofit institutional day or residential schools that are not under Federal or public supervision or control and that provide elementary and/or secondary education as determined under state law, except that the term does not include any education beyond grade 12.

As part of the application process, LEAs must assure that they will comply with [Section 9501 of ESEA \(regarding participation by private school children and teachers\)](#). LEAs must consult with appropriate private school officials during the design, development, and implementation of the professional development program on such issues as:

- How the needs of children and teachers will be identified;
- What services will be offered;
- How, where, and by whom the services will be provided;
- How the services will be assessed and how the results of the assessment will be used to improve those services;
- The size and scope of the equitable services;
- The amount of funds available for those services; and
- How and when the LEA will make decisions about the delivery of services.

Consultation on the delivery of services must also include a thorough consideration and analysis of the views of the private school officials on the provision of contract services through potential third-party providers (Section 9501).

There is no authority for allowing non-public school teachers to receive services if the LEA elects not to participate in the program, nor does the program statute authorize an SEA to reallocate funds to another LEA for the purpose of allowing participation of teachers at a private school located in a nonparticipating LEA.

Eligible Activities

As with any activity that LEA carries out for public school teachers, activities supported with Title II Part A funds that benefit private school teachers must meet the requirements of the statute. For example, activities to be carried out for private school personnel must be based on a review of evidence-based research and must be expected to improve student academic achievement. Professional development activities may include:

- Improving the knowledge of teachers, principals, and other educational personnel in one or more of the core academic subjects and in effective instructional teaching strategies, methods, and skills.
- Training in effectively integrating technology into curricula and instruction;
- Training in how to teach students with different needs, including students with disabilities or limited English proficiency, and gifted and talented students;
- Training in methods of improving student behavior, identifying early and appropriate interventions, and involving parents more effectively in their children's education;
- Leadership development and management training to improve the quality of principals and superintendents; and
- Training in the use of data and assessments to improve instruction and student outcomes.

Title IX, section 9501 of ESEA requires that Title II Part A services for professional development that are provided to private school teachers and other educational personnel be equitable in comparison to those provided to public school teachers. It also requires that funds provided for professional development for private school teachers be equal on a per-pupil basis.

To ensure that LEA are providing equitable professional development services to private school teachers and other educational personnel, the LEA should consider ways to:

- Assess, address, and evaluate the needs and progress of both public and private school teachers;
- Spend an equal amount of funds per students to serve the needs of public and private school teachers and their students;
- Provide private school teachers with an opportunity to participate in Title II activities equivalent to the opportunity provided public school teachers; and
- Offer education services to private school teachers that are secular, neutral, and non-ideological

Consultation and coordination are essential to ensuring high-quality, sustained, intensive and classroom-focused professional development activities for private school teachers. LEAs must assess the needs of private school teachers in designing the professional development program for private school teachers. If the professional development needs of the private school teachers are different from those of public school teachers, the LEA, in consultation with private school representatives, should develop a separate program.

Title II, Part A funds may be used to pay for private school teachers' attendance at the professional conference sponsored or conducted by a faith-based organization to the extent that the conference is part of a sustained and comprehensive secular professional development plan for the teacher.

Title II, Part A funds may be used to pay for stipends for private school teachers, provided that they are reasonable and necessary. For example, if the professional development activity is conducted during after-school hours or in the summer, stipends may be needed to compensate teachers for their participation outside of their regular employment hours. Stipends for private school teachers must be available on the same basis as those for public school teachers and the stipends must be paid directly to the private school teachers for their own use, and not to the private school.

Funds may not be used to pay or subsidize any portion of a private school teacher's salary or benefits, and funds may not be used as payments to private schools for hiring substitute teachers.

Indirect cost

LEAs pay the costs of administering professional development programs for public and private school teachers and other educational personnel "off the top" of their allocations. This is calculated before determining how much of the Title II Part A funds are to be made available for professional development of public and private school teachers and other personnel. Administrative costs of providing services for both public and private school students come "off the top" of a district's allocation before the equal expenditures are computed. Since the LEA is reserving its administrative costs "off the top," the contract administrative costs (including any fee) must come from that set-aside.

If the private school is legally bound by contract to provide a certain level of professional development, it would presumably provide those services regardless of whether Federal funds are available, and it would be supplanting to use Federal funds to provide professional development in place of those services. The law requires that all uses of Title II Part A funds supplement non-federal funds that would otherwise be used for activities, and hence, the professional development provided with Federal funds needs to be in addition to , not in place of, what the private school would otherwise provide.

Other Fiscal and Programmatic Requirements and Options

1. Supplement not Supplant

Districts that receive Title II, Part A funds must comply with the supplement does not supplant requirement. In general terms, this means that **Title II, Part A funds should add to (supplement) and not replace (supplant) state and local funds**. In Title II supplanting is presumed when:

- An LEA uses Title II funds to pay for an activity that is required by federal, state or local law, or
- An LEA uses Title II funds to pay for an activity it supported with state or local funds the prior year, or
- An LEA pays for a service or resource in one school from a state/local funding source, while paying for the same from Title II funds at another school.

An LEA may be able to overcome a presumption of supplanting if it has written documentation (for example, state or local legislative action, budget information, or other materials) that it does not have the funds necessary to implement the activity and that the activity would not be carried out in the absence of the Title II, Part A funds.

2. Transferability

Districts may transfer up to 100% of its Title II, Part A funds to the following programs under ESSA.

- Title I, Part A;
- Title I, Part C;
- Title I, Part D;
- Title III, Part A;
- Title IV, Part A; or
- Title V, Part B.
- Additionally, any amount of Title IV, Part A may be transferred into Title II, Part A.

Transferring funds to other programs may allow for flexibility in the types of activities a district may implement. Further, funds are bound by the requirements to which they are transferred. This transfer process is completed through the application within the Grants Management Application and Planning (GMAP) system.

If all funds are transferred into Title II, equitable services are provided according to the requirements of the program to which funds are transferred. If a portion of Title II funds is transferred, then equitable services may be provided from each program, based on the amount available to each after the transfer.

3. Recordkeeping

Districts participating in Title II, Part A must maintain records showing they are in compliance with applicable statutes and regulations and the activities implemented meets the program's purpose. When deciding what records to keep, KDE highly recommends reviewing the Title II, Part A Monitoring Instrument (Appendix G). This document is organized by important requirement topics and provides examples of the types of documentation that may be maintained for each. This document offers the opportunity to self-monitor your program, as well.

Time and effort documentation must be maintained for staff paid fully or partially with Title II funds. Time and effort records prove that these staff work with the Title II program in a proportionate amount to which they are paid from the program. Documentation must:

- Be supported by a system of internal controls which provides reasonable assurance charges are accurate, allowable, and allocable to the program;
- Be incorporated into official records;
- Reasonably reflect total activity for which an employee is compensated;
- Encompass all the employee's activities, both federal and non-federal;
- Comply with established accounting policies and practices; and
- Support distribution among specific activities or cost objectives.

Sample time and effort reports may be found in Appendix A and Appendix B.

4. Parent Notifications

There are two types of notifications that districts are required to send to parents in regard to the Title II, Part A program: 1) notification of parents' right to request the qualifications of their children's teachers and 2) notification of when a student is taught four or more weeks by a teacher not meeting state certification requirements. Although these notifications are required under ESSA Section 1112(e) for schools receiving Title I, Part A allocations, KDE requires this notification for all schools.

The notification of parents' right to request the qualifications of their children's teachers is required to be issued at the beginning of each school year and must include, at minimum, the following information about whether the teacher:

- Has met state qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction;
- Is teaching under emergency or other provisional status through which state qualification or licensing criteria have been waived;
- Is teaching in the field of discipline of the certification of the teacher; and
- Whether the child is provided services by paraprofessionals and, if so, their qualifications.

Districts may choose to send this home in letter format, include it in a student handbook, post it on the district's and schools' webpages, or any combination of these distribution methods. However, it must be ensured this information is accessible to every parent. In addition, the notification may be published in combination and conjunction with the same or similar notifications required by other federal programs, such as Title I, Part A, as allowable. A sample right to request notification can be found in Appendix C, with an accompanying sample response in Appendix D.

The notification of when a student is taught four or more weeks by a teacher not meeting state certification requirements must only be sent when the four-consecutive-week threshold is met. The threshold is met when students are taught by a teacher(s) not meeting state certification standards for the grade level or content area for which he/she is assigned, whether it is by the same or multiple teachers over the four-week period. This notification must be sent via letter directly to the parents of affected students. Again, the notification may be published in combination and conjunction with the same or similar notifications required by other federal programs, such as Title I, Part A, as allowable. A sample right to request notification can be found in Appendix D.

Appendix A

PERSONAL ACTIVITY REPORT (PAR) Personnel Paid 100% from TITLE II, Part A

School District _____

Employee Name _____

Employee ID # _____

Payroll records must document the staff at the district and school level paid completely from Title II funds. This PAR may be used to document these staff members' time and effort.

- District personnel whose salary is paid in whole from Title II funds must certify, on a semiannual basis (twice a year), that he/she worked solely on that program for the period covered.
- The certification must indicate the period covered by the certification and must be signed by the employee and the supervisor who has first-hand knowledge of the work performed.

This certifies that the employee has worked solely with Title II for the period covered by this certification.	
Date: _____ to _____	
Employee Signature:	Supervisor Signature:
Date Signed:	Date Signed:

This certifies that the employee has worked solely with Title II for the period covered by this certification.	
Date: _____ to _____	
Employee Signature:	Supervisor Signature:
Date Signed:	Date Signed:

Appendix B

PERSONAL ACTIVITY REPORT (PAR) Personnel Partially Paid from TITLE II, Part A

School District _____

Month _____

Employee Name _____

Employee ID # _____

Payroll records must document the staff at the district and school level paid partially from Title II funds.

- District personnel partially paid from Title II funds must certify on a monthly basis that he/she worked a proportionate amount of time in each program from which he/she is paid.
- The certification must indicate the period covered by the certification and must be signed by the employee and the supervisor who has first-hand knowledge of the work performed.

Reporting Period	PROGRAM	PROGRAM	PROGRAM	TOTAL HRS PER DAY	Reporting Period	PROGRAM	PROGRAM	PROGRAM	TOTAL HRS PER DAY
Day of Month					Day of Month				
1					16				
2					17				
3					18				
4					19				
5					20				
6					21				
7					22				
8					23				
9					24				
10					25				
11					26				
12					27				
13					28				
14					29				
15					30				
					31				
TOTALS 1-15					TOTALS 16-31				

This certifies that the employee has completed work during the time period for the federal programs as indicated.	
Employee Signature:	Supervisor Signature:
Date Signed:	Date Signed:

Appendix C

Sample Notification of Parents' Right to Request Teacher Qualifications

Please customize the letter with district letterhead. Personalize to district specific information.

Date

Dear Parent or Guardian:

The educators in **district** are committed to providing a quality instructional program for your child. This letter is just one of the ways of keeping you informed of the educational commitment of our schools and our district.

Our district receives federal funds for Title II program as a part of the Every Student Succeeds Act (ESSA). Under ESSA, you have the right to request information regarding the professional qualifications of your child's teacher(s). If you request this information, the district will provide you the following information about whether the teacher:

- Has met state qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction;
- Is teaching under emergency or other provisional status through which state qualification or licensing criteria have been waived;
- Is teaching in the field of discipline of the certification of the teacher; and
- Whether the child is provided services by paraprofessionals and, if so, their qualifications.

If you would like to request this information, please contact **name of contact** by phone at **phone number** or by email at **email address**. Please include your child's name, the name of the school your child attends, the names of your child's teacher(s) and an address or email address where the information may be sent. Thank you for your interest and involvement in your child's education.

Sincerely,

Superintendent (or Designee)

Appendix D

Sample Teacher Qualification Response to Parents

Please customize the letter with district letterhead. Personalize to district specific information.

Date

Name of Student _____ Date _____

Dear Parent or Guardian:

Thank you for your recent request for information regarding the professional qualifications of your child's teacher(s). Below is information for your child's teacher(s).

Teacher:

Teacher Qualifications	YES	NO
Has the teacher met state qualification and licensing criteria for the grade levels and subject areas in which he/she provides instruction?		
Is the teacher providing instruction under emergency or other provisional status through which state qualification or licensing criteria have been waived?		
Is the teacher providing instruction in the field of discipline of his/her certification? Teacher's Undergraduate and Graduate Degree and the Field of Study for Each, As Applicable:		
Does your child receive services by paraprofessionals? If so, the paraprofessional's qualifications are listed below. Paraprofessional Qualifications:		

Thank you for your interest in the quality of your child's education. Your continued involvement is an important part of your child's academic success. If you have questions about the information that has been provided, please contact me by phone at **phone number** or by email at **email address**.

Sincerely,

Name of person providing information

Title of person providing information

Appendix E

Notification of Teacher Status

Please customize the letter with district letterhead. Personalize to district specific information.

Date

Dear Parent or Guardian,

The Every Student Succeeds Act requires that teachers to meet state certification requirements. Schools are required to notify parents if a teacher(s) who does not meet those requirements has taught their child for four or more consecutive weeks.

The following teacher(s) do not currently meet the ESSA requirements.

<u>Teacher</u>	<u>Course Taught</u>

Please contact me by phone at phone number or by email at email address if you have any questions about this letter. Please contact name of contact by phone at phone number or by email at email address to request the specific qualifications of these teachers.

Sincerely,

Principal

Appendix F

Sample Class Size Reduction Teacher Effectiveness Assurance

Please customize with district letterhead and include applicable information.

ESEA section 2103(b)(3)(D) permits LEAs to use Title II, Part A funds to reduce class size as one strategy to attract and retain effective educators in high-need schools. This requirement presumes that LEAs will not use Title II, Part A funds to hire or pay teachers for the purpose of class size reduction *unless the LEA has previously determined the teachers to be effective.*

Although LEAs conduct their own measures of effectiveness based on [KRS 156.557](#) and subsequent local district policy, a baseline definition of an effective teacher is a teacher who holds a valid teaching certificate in the content and grade level to which he or she is assigned.

The following teacher(s) hold a valid teaching certificate and are teaching in the appropriate content area and grade level.

<u>Teacher</u>	<u>School</u>	<u>Grade Level</u>	<u>Content Area</u>

Additional effectiveness evidence (optional):

School Year: _____

School Principal

Date: _____

District HR Coordinator

Date: _____

District Title II, Part A Coordinator

Date: _____

Appendix G

Program Monitoring Information

As part of its responsibility for Title II, Part A as authorized under the Elementary and Secondary Education Act of 1965, the Kentucky Department of Education (KDE) is required to monitor districts' program implementation. Districts are selected for monitoring based on several factors, including the size of the Title II award, timely submission of the consolidated application and other documents, length of time since the district was last monitored, and others. The purpose of desk monitoring will be to assist district Title II coordinators, examine program design and effectiveness, consider activities being implemented, and support alignment to the approved Title II portion of the consolidated application. This monitoring offers an opportunity for the KDE to provide technical assistance and feedback to the district about effectiveness, sustainability, and compliance with the Title II, Part A program.

The following self-assessment mirrors the desk and consolidated monitoring measures used by the KDE and is being provided as a tool for district coordinators to use in evaluating the overall compliance of the application. This tool can be valuable in determining the degree to which program requirements are being fulfilled and in providing assistance and guidance to strengthen program administration and quality.

Title II Performance Review Self-Assessment and Desk Review Protocol

As a recipient of Title II, Part A grant funds from the United States Department of Education (USDE), the Kentucky Department of Education (KDE) is required to conduct compliance reviews to ensure that school districts use funds in accordance with the authorizing statute. The objectives of the reviews are:

- To assess the degree to which program requirements are being fulfilled and make recommendations when appropriate and
- To provide technical assistance and guidance to strengthen program administration and quality.

For desk monitoring the areas of review will include: (1) teacher certification; (2) program development, implementation, and evaluation; (3) participation of private schools; and (4) financial management. Program records and supporting documentation must be made available for review, and each monitoring indicator lists sample documentation which may be provided. Please note the sample documentation listed is not an all-encompassing list, as other forms of evidence may be provided.

Instructions: Please respond to each self-assessment question. For items requesting a brief response, please provide a narrative answer or submit responsive documentation and indicate in the response (a) the document(s) that are responsive to each question and (b) the specific page or pages of the relevant documents that address each question. Please include each document file name in the “Submitted Documentation File Name[s]” column. In some cases, the same document may be responsive to multiple questions. In that case, you can submit the documentation once and refer to it in multiple questions (including page numbers for each section, as relevant).

Self-Assessment Questions

I. Teacher Certification

Requirement	Yes	No	Submitted Documentation File Name(s)
<p>A. The district ensures that all teachers are appropriately certified upon their hiring. If there are teachers not meeting certification requirements, the district supports these teachers with appropriate professional learning. ESEA 1111 (h)(1)(C)(ix)(II) and 2101(d)(2)(H)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>most recent EPSB certification report</i> • <i>professional learning expenditures</i> • <i>professional learning plans</i> • <i>invoices for coursework</i> • <i>district support plans for new and/or noncertified staff</i> 			
<p>B. The district notifies parents of their right to request and receive information on the qualifications of their children’s teachers. ESEA Section 1112(e)(1)(A)(i)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>dated letter of parents’ right to request teacher qualification information</i> • <i>notification in student handbook</i> 			
<p>C. All schools notify parents when their children are taught for four or more consecutive weeks by teachers who do not meet certification standards. This includes emergency certified teachers. KDE requires this of all schools under the Equitable Access to Effective Educators State Plan ESEA Section 1112(e)(1)(B)(ii)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>dated notification letter(s)</i> 			

II. Program Development, Implementation and Evaluation

Requirement	District Response	Submitted Documentation File Name(s)
<p>A. Describe how the district provides all shareholders the opportunity to consult, design, implement, continually update and improve activities supported through the Title II, Part A program. Shareholders include teachers, principals, other school leaders, paraprofessionals, specialized instructional support personnel, parents, community partners, and other organizations or partners.</p> <p>ESEA Section 2102(b)(3)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>agendas</i> • <i>meeting minutes</i> • <i>sign in sheets (names and areas of representation should be included for all shareholder groups)</i> • <i>meeting invitations</i> • <i>surveys/feedback</i> • <i>letters/emails</i> 	<p><i>enter brief response here</i></p>	
<p>B. Describe how the district designs, conducts and utilizes a comprehensive needs assessment to inform and support the use of Title II, Part A funded activities and initiatives.</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>CSIP/CDIP or other comprehensive needs assessment documents</i> • <i>meeting dates, minutes and/or sign-in sheets</i> • <i>documentation that contributed to the needs assessment (survey results, academic data, graduation rates, etc.)</i> • <i>completed needs assessment</i> 	<p><i>enter brief response here</i></p>	
<p>C. Describe how the district prioritizes funds to schools who are most in need of improvement</p>	<p><i>enter brief response here</i></p>	

Requirement	District Response	Submitted Documentation File Name(s)
<p>(Targeted Support and Improvement (TSI) and Comprehensive Support and Improvement (CSI) schools) and schools that have the highest percentages of students in poverty. ESEA Section 2102(b)(2)(C)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>district needs assessment</i> • <i>detailed MUNIS</i> • <i>budget staffing allocation</i> • <i>professional learning plans</i> 		
<p>D. Describe how class size reduction staff funded through Title II, Part A are directly connected to identified district/school needs, and how class size numbers from the class size reduction strategy are research based. ESEA Sections 2102(b)(2)(B) and 2102(b)(2)(D)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>needs assessment</i> • <i>CDIP/CSIP</i> • <i>cited research for class size reduction (grade-level specific)</i> • <i>staff certification</i> • <i>staff effectiveness evidence</i> • <i>CSR staff job description(s)</i> • <i>effectiveness evidence if CSR staff has been previously utilized</i> 	<p><i>enter brief response here</i> <i>enter N/A if the district does not use funds for CSR</i></p>	
<p>E. Describe how professional learning activities funded by Title II, Part A are based on a review of evidence-based research and meet the statutory definition of professional learning, which requires that PL be:</p> <ul style="list-style-type: none"> • <i>sustained</i> • <i>intensive</i> • <i>collaborative</i> • <i>job-embedded</i> • <i>data-driven</i> • <i>and classroom-focused</i> <p>ESEA Sections 2101(b)(2)(B), 2102(b)(2)(D), 8101(42)</p>	<p><i>enter brief response here</i> <i>enter N/A if the district does not use funds for professional learning</i></p>	

Requirement	District Response	Submitted Documentation File Name(s)
<p>Suggested documentation:</p> <ul style="list-style-type: none"> • CSIP/CDIP • professional learning plans • research of evidence-based practices 		
<p>F. Describe how the district implements supplemental recruiting and retention strategies that intentionally target low-income schools with high percentages of ineffective teachers and high percentages of students who do not meet the challenging state academic standards, to improve equitable access to effective teachers within the district. ESEA Section 2103(b)(3)(B)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • needs assessment • invoices • detailed MUNIS • CSIP/CDIP • meeting minutes 	<p style="text-align: center;"><i>enter brief response here</i> <i>enter N/A if the district does not use funds for recruitment or retention</i></p>	
<p>G. Describe the district's systems of professional growth and improvement. Include descriptions of structures such as staff induction programs and opportunities for building the capacity of teachers and opportunities to develop meaningful teacher leadership. ESEA Sections 2102(b)(2)(B), 2102(b)(2)(D), and 8101(42)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • needs assessment • CSIP/CDIP • professional learning plans • agendas • staff surveys/feedback 	<p style="text-align: center;"><i>enter brief response here</i></p>	
<p>H. Describe how district personnel compensated from Title II, Part A funds are performing assignments appropriate to program implementation as approved in the district's approved application.</p>	<p style="text-align: center;"><i>enter brief response here</i> <i>enter N/A if the district does not use funds for staff compensation</i></p>	

Requirement	District Response	Submitted Documentation File Name(s)
<p>ESEA Section 8306</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>log of activities</i> • <i>lesson plans</i> • <i>MUNIS</i> • <i>teacher assignment roster</i> • <i>needs assessment</i> • <i>job description(s)</i> 		
<p>I. Describe how the district’s Title II, Part A coordinator consults with schools in the development of their programs. ESEA Section 2102(b)(3)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>meeting minutes</i> • <i>agendas</i> • <i>CSIP</i> • <i>email communication</i> 	<i>enter brief response here</i>	
<p>J. Describe how the district annually evaluates the effectiveness of the Title II, Part A program to ensure that student and educator needs are being addressed. ESEA Section 2102(b)(2)(D)</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>program evaluation plan</i> • <i>program evaluation data</i> • <i>meeting minutes</i> • <i>needs assessment</i> 	<i>enter brief response here</i>	

III. Participation of Private Schools

Requirement	Yes	No	N/A	Submitted Documentation File Name(s)
<p>A. Are there private or home schools(non-public) being served by Title II, Part A? (Complete the following if non-public schools exist in the district <u>and</u> have elected to participate).</p> <p>If no is checked, no further action is required for this section.</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>list of participating non-public schools</i> • <i>letters to non-public schools; evidence of receipt</i> • <i>declaration of participation</i> 				
<p>B. The district has consulted with participating non-public schools (NPS) and has completed the required Equitable Service Consultation packet. ESEA Sections 2102(b)(2)(E) and 8501</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>signed and dated consultation packet</i> 				
<p>C. The district has two-way, ongoing communication with the non-public schools served by Title II, Part A to determine the needs of those schools and whether those needs are being met. ESEA Sections 2102(b)(2)(E) and 8501</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>records from consultation meetings</i> • <i>evidence of evaluation of multiple data sources</i> 				
<p>D. Participating NPS programs are operated and overseen by the public school district and documentation verifies that the services provided for participating NPS assist in meeting the professional learning needs of the teachers as identified during consultation. Services provided are non-ideological/non-faith based. ESEA Sections 2102(b)(2)(E) and 8501</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>invoices</i> • <i>consultation forms</i> • <i>surveys</i> 				

Requirement	Yes	No	N/A	Submitted Documentation File Name(s)
<ul style="list-style-type: none"> • <i>needs assessments</i> • <i>evaluations</i> • <i>professional learning records</i> • <i>evidence of regular consultation with NPS officials</i> 				
<p>E. Procedures have been established for the retrieval of Title II, Part A purchases made on behalf of NPS when the materials are no longer needed for program purposes. The procedures require that retrieved purchases be distributed equitably among participating NPS. ESEA Sections 2102(b)(2)(E) and 8501</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>equipment disposal procedures</i> 				
<p>F. Expenditures have been made for NPS teachers on an equitable basis and in accordance with the approved Title II, Part A application. ESEA Sections 2102(b)(2)(E) and 8501</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>invoices</i> • <i>detailed MUNIS</i> • <i>Title II, Part A budget</i> 				
<p>G. Private/home school officials have been notified of the district's complaint procedure, in the event there is a question of equitability of services. ESEA Sections 2102(b)(2)(E) and 8501</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>complaint procedure</i> • <i>consultation agreement</i> • <i>interviews</i> 				

IV. Financial Management

Requirement	Yes	No	N/A	District Response	Submitted Documentation File Name(s)
<p>A. Staffing patterns and financial expenditures/obligations to date are consistent and aligned with the approved Title II, Part A GMAP application (does the spending align with the CSIP/CDIP?). ESEA section 8306, 2 CFR 200.302</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>list and count of staff</i> • <i>financial expenditures on detailed MUNIS</i> • <i>CDIP/CSIP</i> • <i>needs assessment</i> • <i>approved GMAP application</i> 					
<p>B. The district has written procedures in place for time and effort. These written procedures should include instructions for completion of time and attendance reporting and the processing of personnel charges to federal awards. 2 CFR 200.430</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>District time and effort procedures</i> 					
<p>C. The district maintains documentation for any employees paid partially or solely with Title II, Part A funds to support the allocability, veracity and accuracy of the work performed. Records include the time amount/percentage worked directly with Title II, Part A programs, aligns with the approved GMAP budget and is signed and dated by the employee and his/her immediate supervisor. 2 CFR 200.430; 2CFR 200.431</p> <p>Suggested Documentation:</p>					

Requirement	Yes	No	N/A	District Response	Submitted Documentation File Name(s)
<ul style="list-style-type: none"> • <i>PAR supported by a calendar/ schedule of duties/activities that supports the FTE paid with Title II funds</i> • <i>Signed and dated semi-annual certification and/or monthly PAR reports, employee schedules</i> 					
<p>D. A separate accounting of Title II funds is maintained in the MUNIS system identified by school units. ESEA Section 8306</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>detailed MUNIS</i> 					
<p>E. Describe how the district maintains adequate internal controls in the disbursement of Title II funds. ESEA Section 8306</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>procurement policies</i> • <i>signed invoices</i> 				<i>enter brief description here</i>	
<p>F. The district documents that Title II funds supplement, not supplant, general funds. ESEA Section 8306</p> <p>Suggested Documentation:</p> <ul style="list-style-type: none"> • <i>school council general funds staffing allocations</i> • <i>expenditure reports</i> • <i>signed assurances</i> • <i>MUNIS</i> 					

Appendix H

Needs Assessment Planning Tool

The goal of a needs assessment is to help educators identify, understand, and prioritize the needs that districts and schools must address to improve outcomes for students. An effective needs assessment can uncover both strengths and challenges that will inform educator growth and improvement. This planning tool was developed based on information from the US Department of Education (2016) [Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments](#) and is meant for guidance only. It is recommended that needs assessment components required for Title II, Part A are addressed in conjunction with needs assessment components required by other titles of ESEA/ESSA.

Needs Assessment Planning Tool

Planning	
Who will be involved in developing this plan?	<i>Shareholders should include, but not be limited to, teachers, principals, other school leaders, paraeducators, parents, businesses, and other community partners.</i>
How will meaningful feedback be communicated and collected during the planning process?	<i>Regular meetings, surveys, meeting agendas, communication notes, emails, meeting minutes, etc.</i>
Other Considerations:	

Collecting and Analyzing Data	
How should needs be prioritized when several are identified?	<i>What data will be used? Are the data sources reliable and evidence based?</i>
Other Considerations:	

Identification of Needs

	<i>What needs have been identified? Which needs should be prioritized?</i>
Need 1	
Need 2	
Need 3	
Need 4	

Plan for Implementation

	<i>What activities will be implemented to meet the identified needs? Who will be responsible for implementation? Who will monitor implementation and how often will monitoring occur? What is the timeline for implementation?</i>	
	Strategies/Activities to Address Need	Funding Source
Need 1		
Need 2		
Need 3		
Need 4		

Monitoring

	<i>How will implemented activities be monitored? Who is responsible for monitoring? How will feedback be provided? How will monitoring results be reported to shareholders? What plan is in place for next steps?</i>

Glossary

The following definitions are taken directly from ESSA Section 8101, EDGAR, and the UGG.

1. EVIDENCE-BASED— The term “evidence-based”, when used with respect to a State, local educational agency, or school activity, means an activity, strategy, or intervention that—
 - (i) demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on—
 - (I) strong evidence from at least 1 well-designed and well-implemented experimental study;
 - (II) moderate evidence from at least 1 well-designed and well-implemented quasi-experimental study; or
 - (III) promising evidence from at least 1 well designed and well-implemented correlational study with statistical controls for selection bias; or
 - (ii) (I) demonstrates a rationale based on high quality research findings or positive evaluation that such activity, strategy, or intervention is likely to improve student outcomes or other relevant outcomes; and
(II) includes ongoing efforts to examine the effects of such activity, strategy, or intervention.
2. COST OBJECTIVE—The term “cost objective” means a program, function, activity, award, organizational subdivision, contract, or work unit for which cost data are desired and for which provision is made to accumulate and measure the cost of processes, products, jobs, capital projects, etc. A cost objective may be a major function of the non-Federal entity, a particular service or project, a Federal award, or an indirect (Facilities & Administrative (F&A)) cost activity.
3. GIFTED AND TALENTED—The term “gifted and talented”, when used with respect to students, children, or youth, means students, children, or youth who give evidence of high achievement capability in areas such as intellectual, creative, artistic, or leadership capacity, or in specific academic fields, and who need services or activities not ordinarily provided by the school in order to fully develop those capabilities.
4. MULTI-TIER SYSTEM OF SUPPORTS—The term “multitier system of supports” means a comprehensive continuum of evidence-based, systemic practices to support a rapid response to students’ needs, with regular observation to facilitate databased instructional decision making.

5. PARAPROFESSIONAL—The term “paraprofessional”, also known as a “paraeducator”, includes an education assistant and instructional assistant.
6. PARENT—The term “parent” includes a legal guardian or other person standing in loco parentis (such as a grandparent or stepparent with whom the child lives, or a person who is legally responsible for the child’s welfare).
7. PARENTAL INVOLVEMENT—The term “parental involvement” means the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities, including ensuring—
- (A) that parents play an integral role in assisting their child’s learning;
 - (B) that parents are encouraged to be actively involved in their child’s education at school; (C) that parents are full partners in their child’s education and are included, as appropriate, in decision making and on advisory committees to assist in the education of their child; and (D) the carrying out of other activities, such as those described in section 1116.
8. (42) PROFESSIONAL DEVELOPMENT—The term “professional learning” means activities that—
- (A) are an integral part of school and local educational agency strategies for providing educators (including teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, and, as applicable, early childhood educators) with the knowledge and skills necessary to enable students to succeed in a well-rounded education and to meet the challenging State academic standards; and
 - (B) are sustained (not stand-alone, 1-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused, and may include activities that—
 - (i) improve and increase teachers’—
 - (I) knowledge of the academic subjects the teachers teach;
 - (II) understanding of how students learn; and
 - (III) ability to analyze student work and achievement from multiple sources, including how to adjust instructional strategies, assessments, and materials based on such analysis;
 - (ii) are an integral part of broad schoolwide and districtwide educational improvement plans;
 - (iii) allow personalized plans for each educator to address the educator’s specific needs identified in observation or other feedback;
 - (iv) improve classroom management skills;
 - (v) support the recruitment, hiring, and training of effective teachers, including teachers who became certified through State and local alternative routes to certification;

- (vi) advance teacher understanding of—
 - (I) effective instructional strategies that are evidence-based; and
 - (II) strategies for improving student academic achievement or substantially increasing the knowledge and teaching skills of teachers;
- (vii) are aligned with, and directly related to, academic goals of the school or local educational agency;
- (viii) are developed with extensive participation of teachers, principals, other school leaders, parents, representatives of Indian tribes (as applicable), and administrators of schools to be served under this Act;
- (ix) are designed to give teachers of English learners, and other teachers and instructional staff, the knowledge and skills to provide instruction and appropriate language and academic support services to those children, including the appropriate use of curricula and assessments;
- (x) to the extent appropriate, provide training for teachers, principals, and other school leaders in the use of technology (including education about the harms of copyright piracy), so that technology and technology applications are effectively used in the classroom to improve teaching and learning in the curricula and academic subjects in which the teachers teach;
- (xi) as a whole, are regularly evaluated for their impact on increased teacher effectiveness and improved student academic achievement, with the findings of the evaluations used to improve the quality of professional learning;
- (xii) are designed to give teachers of children with disabilities or children with developmental delays, and other teachers and instructional staff, the knowledge and skills to provide instruction and academic support services, to those children, including positive behavioral interventions and supports, multi-tier system of supports, and use of accommodations;
- (xiii) include instruction in the use of data and assessments to inform and instruct classroom practice;
- (xiv) include instruction in ways that teachers, principals, other school leaders, specialized instructional support personnel, and school administrators may work more effectively with parents and families;
- (xv) involve the forming of partnerships with institutions of higher education, including, as applicable, Tribal Colleges and Universities as defined in section 316(b) of the Higher Education Act of 1965 (20 U.S.C. 1059c(b)), to establish school-based teacher, principal, and other school leader training programs that provide prospective teachers, novice teachers, principals, and other school leaders with an opportunity to work under the guidance of experienced teachers, principals, other school leaders, and faculty of such institutions;
- (xvi) create programs to enable paraprofessionals (assisting teachers employed by a local educational agency receiving assistance under part A of title I) to

obtain the education necessary for those paraprofessionals to become certified and licensed teachers;

(xvii) provide follow-up training to teachers who have participated in activities described in this paragraph that are designed to ensure that the knowledge and skills learned by the teachers are implemented in the classroom; and

(xviii) where practicable, provide jointly for school staff and other early childhood education program providers, to address the transition to elementary school, including issues related to school readiness.

9. WELL-ROUNDED EDUCATION—The term “well-rounded education” means courses, activities, and programming in subjects such as English, reading or language arts, writing, science, technology, engineering, mathematics, foreign languages, civics and government, economics, arts, history, geography, computer science, music, career and technical education, health, physical education, and any other subject, as determined by the State or local educational agency, with the purpose of providing all students access to an enriched curriculum and educational experience.