

# OAK PARK SCHOOL DISTRICT

## TITLE I HANDBOOK



## **MISSION STATEMENT**

The mission of Oak Park School District is to provide quality education in which we respect students' individual and cultural differences, educate all students to meet or exceed the district's academic standards, and ensure that they possess the life skills necessary to become lifelong learners and productive citizens.

## **VISION**

The mission of Oak Park School District, in partnership with all stakeholders, will education today's students for tomorrow's worlds.

## **BELIEF STATEMENTS**

Student learning is our core business and every child in the Oak Park School District can and will learn.

Children learn best when our staff maintains high expectations for student achievement in student-centered, standards-based, results-driven classrooms.

Effective leaders listen carefully; anticipate future needs and work constantly to engage others in leadership initiatives to shape necessary changes.

A quality education is a life-long process that fosters academic and cultural understanding.

Continuous improvement demands that all of the Oak Park School District staff regularly use data to guide change and improvement.

A safe, orderly and comfortable environment is essential to learning.

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## **SECTION 1: OVERVIEW**

The Title I, Part A program is designed to help disadvantaged children meet high academic standards by participating in either a school wide or a targeted assistance program. School wide programs are implemented in high-poverty schools following a year of planning with external technical assistance and use Title I funds to upgrade the entire educational program of the school. Targeted assistance programs provide supplementary instruction to children who are failing or most at risk of failing to meet the district's core academic curriculum standards. School-based decision-making, professional development and parent involvement are important components of each district's Title I, Part A program.

## SECTION 2: PROGRAM MODELS

Title I, Part A of NCLB defines two program designs for delivery of Title I instructional services to students. The two design models are Targeted Assistance and School wide. The statute has established guidelines for schools and student eligibility, required program components, fiscal requirements, and record keeping regulations. Oak Park Schools provides Targeted Title I services at Pepper Elementary, Key Elementary, Einstein Elementary, Oak Park Preparatory Academy, Oak Park High School.

### Targeted Assistance Schools

A Targeted Assistance School (TAS) is one that receives Title I, Part A funds, yet is ineligible or has chosen not to operate a Title I School wide School (SWS) Program. A TAS provides services to a select group of children – those the school identifies, on the basis of multiple educationally-related objective criteria, as failing or most at risk of failing to meet the State’s challenging content and performance standards. TAS may not provide services for all students in the school, or for all students in a particular grade. Title I Targeted Assistance Programs differ from School wide Programs in the following ways:

- TAS does not require a comprehensive School wide program needs assessment, but may use Michigan’s Comprehensive Needs Assessment (CNA) as a starting point in data gathering.
- A targeted list of students with clear entrance and exit criteria must be maintained.
- In TAS, Title I, Part A funds may be used only for programs that provide services to eligible children (failing or at risk of failing to meet standards).
- Funds must be used for services that supplement, not supplant—services that would be provided by nonfederal sources, in the absence of Title I, Part A funds.
- Records must be maintained documenting the expenditure of Title I, Part A funds solely on services for eligible students.

In TAS, Title I funds are traditionally used to add supplemental reading and/or mathematics, and, in Michigan, social studies and science programs serving a select number of identified students.

### Student Eligibility

Selecting the highest needs children for the Title I program is an integral part of a Targeted Assistance Program. Selection for the Title I program is conducted at both the school and the district levels, and differs for children by grade level. Eligible children are identified as those failing or being at risk of failing to meet academic achievement standards.

- Children from PK through grade 2 must be selected on the basis of teacher judgment, interviews with parents, and results of developmentally appropriate measures.

- Eligibility of students in grades 3-12 must be based on multiple, educationally-related objective criteria established by the Local Educational Agency (LEA) and supplemented by the school. Parent request and teacher judgment may be used to place children in grades 3-12 in Title I programming in conjunction with, but not in place of, standardized achievement measures.

With the authorization of the No Child Left Behind Act of 2001 (NCLB), the categories of children who are automatically eligible for Title I programs has expanded to include:

- Students served in the previous two years under the Migrant Education Program,
- Students who participated in Even Start, Head Start, Early Reading First or a Title I preschool service within the previous two years,
- Students attending a community day program or living in a State or local institution for neglected or delinquent children; and
- Students who are homeless and attending any school in the LEA (not necessarily a Title I-funded school).

School teams should select criteria for determining the eligibility of students that will provide the most accurate reflection of academic and developmental ability. A minimum of two criteria must be used to determine student placement at all levels. However, it is not necessary that the criterion be the same for all grades. Criteria for the selection of students could include standardized test scores, locally developed assessments, teacher checklist, grades, and other factors such as homelessness.

Teacher assessment and referrals inform the selection process. This information is important in determining each student's success in the classroom. Examples of teacher assessments are ratings of subject area skills and relative student performance within the regular classroom. In the example below (Illustration I), the district-created Reading Rubric is one of the educationally-related objective criteria as well as a teacher survey that scores each student from 0 (high skills) to 10 (low skills) in subject areas such as reading or mathematics, performance of those skills and classroom performance. After the scores have been collected and summarized, a targeted list is developed that places students in order of need based on the criteria. See Illustration 2 for an example of a targeted list.

The student selection process will result in a rank ordering of students for each subject area (English language arts, mathematics, science and social studies). The basic guidelines for selecting students are as follows:

- Students in greatest need are to be served in rank order.
- Selection is based on multiple, educationally-related, objective criteria established by the LEA and supplemented by the school.

- Except for grades K-2, teacher referral can never be the primary factor for placing a student into the Title I program.

Based on a student-by-student case, it may be determined that another service a student is receiving is sufficient to enable them to meet the State's standards. It must be documented on the target list why a higher needs student has not been for services. Should a school decide to serve a low-priority student ahead of a high-priority student, the reason must be clearly documented and determined on a case-by-case basis. Acceptable reasons for non- placements of high priority students include parent refusal of placement and whether a student's needs are addressed through other services. Students may not be removed from the list just because they receive another educational services such English language services or specially-designed instruction through an Individualized Education Program (IEP).

#### Serving Limited English Proficient (LEP) Students and Students with Disabilities

Children with disabilities and LEP children are eligible for Title I, Part A services on the same basis as other children who are selected for services. However, they are also entitled to services required by law because of their disability or their limited proficiency in English. To avoid supplanting, a TAS may not use Title I, Part A funds to provide the level of services necessary to meet the Federal, State or local law requirements for LEP children or children with disabilities. Title I, Part A funds may be used to coordinate and supplement these services as well as to provide additional direct services to these children.

#### Exit Criteria and Procedures

In addition to determining which students will be served by Title I, TAS must set criteria by which students may receive an academic exit from the program. This exit process depends on the selection criteria and individual student performance. In order to provide equal access to all children, it is important for each school to have clearly delineated the processes and criteria that will be used to move children in and out of Title I programs.

Academic exit actually refers to the fact that the child that is no longer considered eligible for Title I program services. When a child reaches grade level, or meets the Title I program criteria for an academic exit, even if he or she continues to receive services until the end of the grade being served, that child is noted as an academic exit. Moving into a grade that does not have Title I services from a grade that did is not considered an academic exit. For example a program designed around early reading and/or mathematics success tends to provide services to children at specific grades; once the child has moved out of the grades where services are offered, services end. This type of program exit is not referred to as an academic exit.

At what point in a student's academic gain or performance should he or she no longer be served by Title I? The capacity of the Title I program (the number of eligible students that could be served compared to the staffing and programs for them) is a large consideration. Elementary programs tend to differ from secondary programs. Ideally, all eligible students receive supplemental Title I services until they are no longer at risk of failing to meet the State's standards. The reality is, however, that many Title I programs have waiting lists of eligible students who may have greater need than students who have been in Title I, made progress, but are still not meeting standards.

Typically, schools that provide services to the highest needs children throughout the grades tend to keep students enrolled in Title I year after year. In some cases even though a student may be progressing appropriately in the classroom, the Title I program continues to serve him or her just to provide that bit of extra support. When there is no waiting list of eligible, higher-needs students, this may be acceptable. However, when other students are waiting to participate this would not be an advisable practice. Title I students may be given an academic exit, still have their progress monitored and even receive supplemental services as needed through the simultaneous service clause in Title I.

#### Simultaneous Service/Incidental Inclusion

Schools are encouraged to provide Title I services to students in a variety of ways. Schools may serve Title I, Part A students simultaneously with students with similar educational needs and in the same educational settings as students with similar needs.

#### Components of Targeted Assistance Programs

The ten required components of Title I targeted assistance programs, including the applicable legislative citations, are:

1. **Needs Assessment:** how teachers, in consultation with parents, administrators, and pupil services personnel, in targeted assistance schools under section 1115, will identify the eligible children most in need of services under this part. [NCLB Act Sec. 1112(H)]
2. **Services for Eligible Students:** describe the nature of the programs used to service eligible students in the program. [NCLB Act Sec. 1112(b)(1)(I)]
3. **Incorporated Into Existing School Program Planning:** ensure that planning for students served under this part is incorporated into existing school planning. [NCLB Act Sec. 1115(c)(1)(B)]
4. **Instructional Strategies:** ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging State academic achievement standards and state academic assessments by using effective methods and instructional strategies that are based on scientifically based research that strengthen the core academic program of the school and that give primary consideration to providing extended learning time, such as an extended school year, before- and after-school, and summer programs and opportunities; help provide an accelerated, high-quality curriculum, including applied learning; and minimize removing children from the regular classroom during regular school hours for instruction provided under this part. [NCLB Act Sec. 1115(c)(1)(C)(i)(ii)(iii)]
5. **Title I and Regular Education Coordination:** how the local educational agency will coordinate and integrate services provided under this part with other educational services at the local educational agency or individual school level, such as— Even Start, Head Start, Reading First, Early Reading First, and other preschool programs, including plans for the transition of participants in such programs to local elementary school programs; and services for children with limited English proficiency. [NCLB Act Sec. 1112(E)(i)(ii)]

6. Instruction by Highly Qualified Staff: provide instruction by highly qualified teachers and paraprofessionals. [NCLB Act Sec. 1115(c)(1)(E)]

1. High-Quality and Ongoing Professional Development: provide opportunities for professional development for teachers, principals, and paraprofessionals, including, if appropriate, pupil services personnel, parents, and other staff, who work with participating children in programs under this section or in the regular education program.[NCLB Act Sec. 1115(c)(1)(F)]
2. Strategies to Increase Parental Involvement: provide strategies to increase parental involvement in accordance with section 1118, such as family literacy services. A school SHALL engage in the following parent involvement activities:
  - Assist parents in understanding the State’s content standards and assessments and how to monitor their child’s progress.
  - Provide materials and training to help parents work with their children.
  - Train staff to build effective parent involvement.
  - Collaborate with other programs to coordinate parent involvement.
  - Provide information in a format and language that parents can understand.
  - Provide other reasonable support for parent involvement as parents may request
  - Provide full opportunities for participation of parents with Limited English Proficiency or with disabilities and for parents of migratory children.
  - Jointly develop with parents for all children served under this part a school- parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State’s high standards. Such compact shall describe the school’s responsibility to provide high quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State’s student academic achievement standards, and the ways in which each parent will be responsible for supporting their children’s learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child’s classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and address the importance of communication between teachers and parents on an ongoing basis through, at a minimum, parent-teacher conferences in elementary schools, at least annually, during which the compact shall be discussed as the compact relates to the individual child’s achievement; frequent reports to parents on their children’s progress; and reasonable

access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities. [NCLB Act Sec. 1118(d)]

- 2. Coordination of Title I and Other Resources:** coordinate and integrate Federal, State, and local services and programs, including programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start, adult education, vocational and technical education, and job training. [NCLB Act Sec. 1115(c)(1)(H)]
- 3. Ongoing Review of Student Progress:** reviewing, on an ongoing basis, the progress of participating children and revising the targeted assistance program, if necessary, to provide additional assistance to enable such children to meet the State's challenging student academic achievement standards, such as an extended school year, before- and after-school, and summer programs and opportunities, training for teachers regarding how to identify students who need additional assistance, and training for teachers regarding how to implement student academic achievement standards in the classroom. [NCLB Act Sec. 1115(c)(2)(B)]

#### Selecting a Service Delivery Model

There are several models available for TAS. The TAS, in consultation with the district Title I, Part A Director, selects the most appropriate service model. Pull-out models are highly discouraged, while models that include before- and after-school programming, extended year education and summer opportunities are encouraged. When a delivery model has been selected, it must be demonstrated that students receiving Title I, Part A services benefit from the additional instruction and support.

#### Comprehensive Services

Districts and schools may utilize Title I funds to provide additional services beyond academics if these services are not otherwise available. Sites must have identified partnerships with social service and community agencies and be able to demonstrate that such services are unavailable through other agencies. In addition, they must complete a comprehensive needs assessment prior to redistribution of Title I, Part A funds. Comprehensive services that may be funded by Title I, Part A funds, which meet the above criteria, include, but are not limited to, basic medical equipment (such as eye glasses and hearing aids) to children receiving Title I services.

#### Needs Assessment

Each school will conduct an annual needs assessment. The needs assessment gathers and analyzes information from the following student data resources: report on the number of eligible Title I students in the district; student data including pre and post Title I service data, MEAP results, student grades, and general education teacher input. Additionally, a survey of Title I parents for input into their perception of the program's effectiveness and any perceived needs that should be addressed in the next year's program is to be conducted each spring. The school's principal, leadership team, classroom teachers, Title I teachers and other stakeholders, as appropriate, review the data to determine priorities based on identified needs, expected funding for the following year, and district goals. Recommendations are incorporated into the School Improvement Plan. To meet the

deadline for improvement plans, the needs assessment should occur no later than March 1 of each school year. The Michigan Department of Education's Planning Tool (see Appendix B) may be used to assist building teams.

#### Program Comparability

Districts are required to use district funds to provide educational services in Title I schools that are comparable to the services provided in non-Title I schools. Title I districts are required to demonstrate annually through appropriate documentation that they are in compliance with Title I comparability requirements. The Oak Park School Districts Office of Federal and State Programs will complete annual comparability calculations and provide written assurance.

#### Program Evaluation

At the end of each school year and in conjunction with the Needs Assessment, each Title I school will evaluate the program's effectiveness, using the Michigan Department of Education's Program Evaluation Tool (see Appendix C). The Office of Federal and State Programs will be responsible for leading the program evaluation of all district Title I programs. Specifically, leadership teams in Title I buildings should conduct the program evaluation with the following areas specifically in mind:

- Improved student outcomes
- Greater parental involvement
- More high quality professional development
- Effectiveness of instructional strategies, materials, and resources

In conducting the program evaluation, school teams will review student data and survey both parents and staff to ascertain the actual and perceived impact on student achievement. The findings will be used to plan and improve the program for the next year, pending funding. A summary of the program evaluation detailing the program's strengths and weaknesses and providing recommendations for change will be kept by the Office of Federal and State Programs.

### **Administrative Responsibilities**

As with any Federal funding, it is critical that all records are kept, well-maintained, and up-to-date. The following record-keeping duties must be met to ensure adherence to Federal guidelines.

- Records must be maintained that document that Title I, Part A funds are spent on activities and services only for participating Title I, Part A students.
- Title I, Part A funds may not be used to identify at-risk students. It is the responsibility of the LEA and school to identify at-risk students. A school or district should have some methods in place to do this even in non-Title schools. Once the at-risk students are identified, Title I, Part A funds may be used to identify those most in need of the Title I, Part A services or to identify their specific educational needs or weaknesses.

The Office of Federal and State Programs will maintain the following records in the district office. All district, school and student records must be retained for three (3) years. The records are confidential, legal documents and must be available to local and USED Federal auditors, parents, students and MDE.

- Selection criteria and selection process for Title I, Part A-eligible children.
- Documentation of parent meetings.
- Copies of the Home-School Compact for each TAS.
- Service-delivery model description for each TAS
- Time and effort records of every Title I, Part A-funded teacher, paraprofessional, administrator and counselor.
- Program evaluations.
- Program review results.

Schools must keep records of the following documents. All district, school and student records must be retained for three (3) years. The records are confidential, legal documents and must be available to local and USED Federal auditors, parents, students and MDE.

- Selection criteria and selection process for Title I, Part A-eligible children.
- Selection worksheets demonstrating how students were selected for service.
- Description of service delivery models.
- Documentation of parent meetings and conferences.

- Evaluations of each service delivery model (including extended day/year models).
- Comprehensive services provided to eligible students.
- Student-related data to include:
  - Student name, race/ethnicity, disability and/or LEP status. ○
  - MEAP/MME Assessment or other standardized test score(s). ○
  - Date of entrance into program.
  - Services provided.
  - Progress made.
  - Parent contacts (recommended but not required).
  - Date and reason for exiting the program.

### **SECTION 3: FUNDING**

In order to maintain fidelity of the program, Title I requires that federal funds be used to supplement the educational program and not serve as a substitute for services that would be provided by other funding sources. Once these requirements have been established, there are restrictions on the eligibility of expenditures that the District and individual schools are allowed to select. Caution must be used to ensure that all expenditures meet the required federal guidelines.

The Office of Federal and State Programs reviews requests and maintain the integrity of the utilization of funds; however, there are requests that CAN NOT be approved because they are in violation of program restrictions. The following suggestions and guiding questions will help schools ensure that Title I funds are used to provide supplemental services, not supplant other district obligations:

- Do the funds take the place of funds that would, if there were no Title I funds, be spent on the Title I students anyway? Would this money have come from a state or local fund if the school didn't have Title I money? If yes, Title I funds CAN NOT be used.
- Does the state or district require the materials, program, or services for Title I and non-Title I schools? If yes, Title I funds CAN NOT be used.
- Is the expenditure for incentives or rewards for Title I teachers? Incentives and rewards for teachers are NOT allowed.
- Is the expenditure for student incentives or rewards? Is the program to encourage attendance or to reward participation? Funds CAN NOT be used for student rewards or incentives of any type.
- Is the purpose academic or non-academic? The purpose MUST be academic.
- Is the request in line with your School Improvement Plan?
- Does the request match the goals of your school plan?
- Is this expenditure reasonable and NECESSARY?

Additional guidance is provided by grant procedures developed by the Oak Park School Districts Business Office (see Appendix D).

## **SECTION 4: TITLE I/NCLB RULES AND REGULATIONS**

### **Adequate Yearly Progress**

Adequate Yearly Progress under No Child Left Behind has two components:

- **Participation:** In the spirit of the law, each student is entitled to an annual assessment. The All Student group and each subgroup must have at least 95% of its students participate in the test administration.
- **Academic Performance:** All students and each subgroup that meet the "full academic year" (FAY) definition and meet the minimum group size must meet the annual measurable objectives (AMO) or targets. The AMO targets are the percent of students classified as proficient due to their test performance.

### **Highly Qualified Staff**

Recognizing the importance of effective teachers, the No Child Left Behind Act of 2001 (NCLB) requires that schools be staffed with highly qualified teachers and paraprofessionals. Additionally, professional development activities must ensure that teachers and paraprofessionals meet the highly qualified provisions of NCLB. Local educational agencies (LEAs) must notify parents of their rights to request information regarding the professional qualifications of the student's classroom teachers.

All teachers in the Oak Park School District meet highly qualified requirements set forth by the No Child Left Behind law and the Michigan Department of Education. Only highly qualified teachers are hired for posted positions, and all credentials are reviewed and updated by the Human Resources Department on an annual basis if teaching assignments change. In addition, provisions of the collective bargaining agreement with the Oak Park Education Association state:

The Board of Education of the Oak Park School District and the Oak Park Education Association, recognizing that with the re-enactment of the Elementary and Secondary Education Act (ESEA)/No Child Left Behind (NCLB) (20 USC 6301 et seq) effective January 8, 2002, highly qualified status will be required of those teachers teaching in core content areas, as identified under this law.

Paraprofessional requirements are strengthened in the No Child Left Behind Act of 2001 (NCLB) and require that all paraprofessionals who work in an instructional program supported by Title I funds (School wide program or targeted assistance program) be highly qualified. A paraprofessional is an individual with instructional duties. Individuals who work solely in non-instructional roles, such as food service, cafeteria or playground supervision, personal care services, and non-instructional computer assistance are not considered to be paraprofessionals for Title I purposes. Additionally, paraprofessionals may not provide instructional support to students unless they are under the direct supervision of a highly qualified teacher. A paraprofessional is deemed to work under the direct supervision of a teacher if the teacher plans the instructional activities for the paraprofessional, the teacher

evaluates the achievement of students with whom the paraprofessional works, and the paraprofessional works in close and frequent proximity to the teacher. Credentials of all paraprofessionals have been reviewed by the Human Resources Department, and all paraprofessionals in the Oak Park Schools meet highly qualified provisions of NCLB. It is the practice of the District to hire only highly qualified individuals for posted positions.

#### Parent/Guardian Outreach and Involvement

Each Title I school must comply with the legal requirements of NCLB Section 1118, Parental Involvement. Each school must demonstrate evidence of implementation of the following:

- 1. Annual Title I Meeting:** fall curriculum night or first parents' meeting can serve to meet this requirement. Your school is required to conduct an annual Title I meeting and should clearly identify the meeting as the Title I Annual Meeting on announcements, agendas, and programs. Designated administrators, Title I representatives, or other appropriate personnel are required to present the following information in writing and verbally to the parents:
  - Explanation of what it means to be a Title I school, whether the school has a Targeted Assistance or School wide Program, the benefits to the students, and the requirement and right of parental involvement.
  - Student Academic Assessment – provide assistance to parents as is appropriate in understanding state and local assessments, including AYP.
  - High Quality Curriculum – explain school's responsibility to provide high-quality curriculum and instruction and the parent's role in supporting their child's learning
  - Parental Communication and Training—to promote parental involvement
- 2. Parents Right to Know:** submit documentation to the Office of Federal and State Programs of your:
  - Parent Involvement Plan
  - Parental Notification
  - Parent-Student Teacher Compact

#### Parents' Right to Know

The school must inform parents of their rights and that the school/district will provide the information to each parent as requested. There are three requirements:

1. Inform the parents that they may request certain information on the professional qualifications of the student's classroom teachers and paraprofessionals providing services to their child. [Section 1111 (h)(6)(A), ESEA]

2. Inform the parents that the school will provide to each parent timely notice if the parent's child has been assigned to, or taught, for four or more consecutive weeks by a teacher who is not highly qualified. [Section 1111 (h)(6)(B)(ii), ESEA]
3. Inform the parents that the school must provide, to each individual parent, information on the level of achievement of the parent's child in each of the state academic assessments. [Section 1111 (h)(6)(B)(i), ESEA }

### **Parental Notification**

At the beginning of each school year, local educational agencies (LEAs) must notify parents of their rights to request information regarding the professional qualifications of the student's classroom teachers. This notice will be included in the Oak Park Schools annual report to parents. Specifically, such notification must include:

1. Whether the teacher has met state qualifications for the grade levels and subject areas in which the teacher teaches.
2. Whether the teacher is teaching under emergency or other provisional status.
3. The baccalaureate degree of the teacher and any other graduate certification or degree held by the teacher and the field or discipline of the certification or degree.
4. Whether the student is provided services by paraprofessionals.

Parent notification is not required for teachers who do not teach core academic subjects in Title I School wide or targeted assistance programs or for paraprofessionals who are not highly qualified.

### **School/Parent Compact**

Each school receiving funds under Title I, Part A of the Elementary and Secondary Education Act (ESEA) must develop a written school-parent compact jointly with parents for all children participating in Title I, Part A activities, services, and programs. That compact is part of the school's written parental involvement policy developed by the school and parents under section 1118(b) of the ESEA. The compact must outline how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards.

### **School Improvement Plans**

In accordance with state regulations, the School Improvement Team at each school participates in writing an annual School Improvement Plan that incorporates both the school and district goals and objectives for the upcoming school year. In developing or revising its plan, the school must consult with parents, school staff, and other stakeholders. The Michigan Department of Education provides the proper School Improvement Plan template depending on a school's Title I status. Targeted Assistance schools will receive the Targeted

Assistance School Improvement Plan on the AdvancEd website.

### **Time and Effort Distribution Logs**

Districts must maintain auditable "time and effort" records that show how each Title I employee spends his/her compensated time. These records are written, after-the-fact documentation of how the time was spent. Time and effort records must be prepared by any Title I staff with salary charged (1) directly to a federal grant, (2) directly to multiple federal grants, or (3) directly to any combination of a federal grants and other federal, state or local fund sources. This requirement applies to both full time Title I and "split-time" Title I staff. Stipends must also be reported. These forms will need to be distributed as soon as possible and completed for twice a month from September to June. Time and effort records are submitted to the Title I office.

### **Semi-Annual Certification**

Periodic certification is required when LEAs use federal funds to pay employees' compensation. When LEAs pay employees' compensation using one federal grant (for example, Title I Part A) those employees must sign a form called a "semi-annual certification". If the LEA pays employees from more than one funding source (for example, State QBE, Title I Part A and Title II Part A), the employees must complete a form with more detailed information, commonly referred to as a Personnel Activity Report (PAR).

The Office of Federal and State Programs will send forms and instructions for periodic certification to the schools on December 1 and May 1 of each school year. Follow the instructions and submit the periodic certification documents to the Office of Federal and State Programs by the prescribed deadline.

## **SECTION 5: MCKINNEY-VENTO HOMELESS ACT**

In compliance with state and federal requirements concerning the McKinney-Vento Homeless Assistance Act, the district will designate a homeless liaison to coordinate services to eligible children and youth. The liaison will coordinate services for homeless children and youth through collaboration with system and school personnel and community organizations in order to identify children and youth experiencing homelessness in the district, both in and out of school. The liaison will coordinate identification of children and youth in a timely manner to minimize the impact of homelessness on educational opportunities and services. The liaison will inform principals, guidance counselors, and other appropriate school personnel of the McKinney-Vento Homeless Assistance Act and the local educational agency (LEA) homeless policies and procedures.

The homeless liaison will train appropriate and selected school personnel on possible indicators of homelessness, sensitivity and confidentiality in identifying families and youth as experiencing homelessness, and in procedures for completion of the system Homeless Residency form and for relaying the information to the liaison. The system liaison will instruct school secretaries, counselors, and/or other designated personnel to inquire about possible homelessness upon the enrollment and withdrawal of every student and to forward the system homeless residency form to the liaison. The liaison will maintain communication with the town's social service agency and collaborate to promote identification of homeless children and youth. Community partners in identification of homelessness may include: family and youth shelters, soup kitchens, motels, campgrounds, drop-in centers, welfare departments, social service agencies, faith-based organizations, truancy and attendance officers, and legal service agencies.

The liaison will keep data on the number of children and youth experiencing homelessness in the district, where they are living, their academic achievement (including performance on statewide and district wide assessments), and the reasons for any enrollment delays and or interruptions in their education or school transfers.

Each child or youth experiencing homelessness has the right to remain at his or her school of origin, or to attend any school that housed students, who live in the attendance area in which the child or youth is actually living, are eligible to attend. Maintaining a student in his/her school of origin is important for both the student and the school district. Students who change schools have been found to have lower test scores and overall academic performance than peers who do not change schools. High mobility rates have been shown to lower test scores for schools and systems. Keeping students in their school of origin promotes academic and social growth, while allowing the schools to maintain more stable test scores and achievement resulting from student continuity.

To the extent feasible, children and youth experiencing homelessness will remain at their schools of origin. If this policy is against the parent's or the youth's wishes or not in the best interest of the child, appropriate school placement will be established to meet the needs of the family and student. Students may remain at the school of origin the entire time they are experiencing homelessness and until the end of the year in which they become permanently housed. The same guidelines will apply if a child or youth becomes homeless between academic school terms. Feasibility shall be a child-centered determination, based on the needs and

interests of the particular student and the parent's and youth's wishes. Feasibility considerations include:

- Safety of the student
- Continuity of instructional services
- Potential family's or youth's future housing
- Time remaining in the current academic term
- Anticipated length of stay in temporary housing or living situation
- School placement of siblings
- Special needs that limit placement due to commute issues or facilities

Services that are required to be provided, including transportation to and from the school of origin and services under federal and other programs, shall not be considered as factors of feasibility.

#### Enrollment

Consistent, uninterrupted education is essential to academic achievement. Because of the complicating issues related to homelessness and mobility, students who are victims of homelessness are likely not to have required school enrollment documents readily available when they seek to enroll in a different school or system. Regardless of the availability, or the lack thereof, of required documents, the selected school of enrollment must immediately and without restriction enroll the child or youth experiencing homelessness. Enrollment may not be denied on the basis of lack of any document normally required for enrollment, including:

- Proof of residency
- Transcripts/school records (The enrolling school must contact the student's previous school to obtain school records. Initial placement of students for whom records are not immediately available can be made based on the student's age and information gathered from the student, parent, guardian, and previous schools and/or teachers.)
- Immunizations or immunization/health/physical records (If necessary, the school must refer students to the liaison to assist with obtaining immunizations and/or immunization/ other medical records. Health records may often be obtained from previous schools or state registries, and school-based or community-based clinics can initiate immunizations when needed.)
- Proof of guardianship

- Birth certificate
- Any other document requirements
- Unpaid school fees
- Lack of uniforms or clothing that conforms to dress codes
- Any factor related to the student's living situation

Unaccompanied youth must also be immediately enrolled in school. They may either enroll themselves or be enrolled by a parent, non-parent caretaker, older sibling, or the LEA homeless liaison.

### **Transportation**

Without appropriate transportation, a student may not be able to continue attending his/her school of origin. To avoid such forced transfers, at a parent's request, transportation shall be provided to and from the school of origin for a child or youth experiencing homelessness. Transportation shall be provided for the entire time the child or youth has a right to attend that school, as defined above, including during pending disputes. The LEA homeless liaison shall request transportation to and from the school of origin for unaccompanied youth. The length of the commute will only be considered in determining the feasibility of placement in the school of origin based on potential harm to the student, as discussed above. Parents and unaccompanied youth must be informed of this right to transportation before they select a school for attendance.

### **Services**

Children and youth experiencing homelessness shall be provided services comparable to services offered to other students in the school selected, including:

- Transportation (as detailed above)
- Title I, Part A (as described above)
- Educational services for which the student meets eligibility criteria, including special education and related services and programs for English Language Learners
- Vocational and technical education programs
- Gifted and talented programs
- School nutrition programs
- Before-school and after-school programs

## **Disputes**

The McKinney-Vento Homeless Assistance Act acknowledges that disputes may arise between the school district and homeless students and their parents/guardians when the student is placed in a school other than the one requested. The following procedures are specified in the Act:

- Enrollment: Immediately enroll the homeless student in the school preferred by the parents until the dispute is settled.
- Written explanation: District will provide a written explanation of the school placement decision to the parent/guardian or unaccompanied youth.
- If a question concerning the education of the homeless child arises, contact Oak Park School District Homeless Liaison, Angela Smith, at 248.336.7708 to discuss the complaint with the complainant.
- A determination will be made as to whether the requested services for the homeless student are consistent with our local school board policy.
- If the complaint is not resolved, the complainant will be advised to present it in writing to the homeless liaison.
- A written proposed resolution of the complaint or plan of action will be provided to the complainant within five (5) days of receipt of the written complaint.
- If the complaint is not resolved within five (5) days, contact Mrs. Smith, to present the written complaint. An appointment will be made for the complainant to meet with Mrs. Smith to discuss the complaint. At the end of the discussion, a written resolution will be provided within five (5) days of the date of discussion.
- If the complaint is not resolved in a satisfactory manner at the local level, the complaint may be directed to the Michigan Department of Education. Complaints made under this process must be made in writing and signed by the complainant.
- Address the complaint to the Michigan Department of Education, State Homeless Coordinator, P.O. Box 30008, Lansing, MI 48909.
- Include in the complaint:
  - A description of the situation that prompted the complaint.
  - The name(s) and age(s) of the child or children involved.
  - The name(s) of the involved school district personnel and the school district or districts involved.
  - A description of the attempts that were made to resolve the issue at the local level, including copies of any documentation.

- The State Homeless Coordinator will gather needed information from statements of the parties involved and will forward the information to the director of the Office of School Improvement along with recommendation for resolution or further investigation.
- Within thirty (30) days after receiving a complaint, the Supervisor of the Office of Federal & State Grants will recommend a resolution and will inform interested parties in writing of the decision.

### **Free Meals**

Hunger and poor nutrition are preventable barriers to learning. To ensure that children and youth experiencing homelessness are available for learning and have adequate nutrition, the U.S. Department of Agriculture has determined that all children and youth experiencing homelessness are automatically, upon enrollment, eligible for free meals. On the day the child or youth experiencing homelessness enrolls in the school, the enrolling school must immediately submit the student's name and a residency form to the district nutrition office for immediate processing. The homeless liaison will sign the residency form to expedite the eligibility process. The child is immediately eligible to receive free meals.

### **Title I, Part A**

Children and youth experiencing homelessness are automatically eligible for Title I, Part A services, regardless of the school they attend, whether or not the school is a Title I school. The trauma and instability of homelessness places students at risk of academic regression to warrant additional support. The district shall reserve such funds as are necessary to provide services to children and youth experiencing homelessness that are comparable to those provided to Title I, Part A students. The amount reserved shall be determined by a formula based on the per-pupil Title I, Part A expenditure and developed jointly by the liaison and the Title I director. Reserved funds will be used to provide educationally related support services to the children and youth experiencing homelessness, both in school and outside of school, and to remove barriers that prevent regular attendance.

# Appendix A

## Oak Park School Districts Federal and State Grant Compliance Procedures and Timeline

## Oak Park School Districts Federal and State Grant Compliance Procedures and Timeline

<b>Two weeks before school</b>	Annual Education Report posted, with notification to parents of Title I schools of their right to request information regarding the professional qualifications of their child's classroom teacher(s) and paraprofessional.
<b>September 1</b>	School Improvement Plan submitted in AdvancEd (ASSIST) Portal
<b>September 1</b>	Copy of Parent Involvement Plan and Parent Compact due to the Office of Federal and State Programs.
<b>September 1</b>	Section 31a At-Risk eligibility worksheets distributed to schools from the Office of Federal and State Programs.
<b>Prior to September 30</b>	Office of Federal and State Programs conducts annual training meeting with building staff and school principals to review procedures and requirements of Title I and Section 31a At-Risk programs.
<b>September 30</b>	Section 31a At-Risk eligibility worksheets due to the Office of Federal and State Programs.
<b>September 30</b>	Master list of Title I students in targeted assistance programs, description of selection criteria used to determine eligible students, and description of exit criteria due to the Office of Federal and State Programs.
<b>October 15</b>	Meeting agenda and sign-in sheets from Title I parent meeting due to the Office of Federal and State Programs (parent meeting should be held in conjunction with Curriculum Night and designated specifically as a Title I Parent Meeting).
<b>December 1</b>	Assurance statement that Title I parent compact was reviewed at elementary parent teacher conferences due to the Office of Federal and State Programs.
<b>March 1</b>	Needs assessment and program evaluation documents due to the Office of Federal and State Programs for all Title I and Section 31a At-Risk programs.
<b>April 1</b>	Office of Federal and State Programs publishes professional development offerings for consideration in Title II professional development plans.
<b>April 15</b>	Review, evaluation and revision of Targeted Assistance components of the school-level School Improvement Plans at Facilitators of School Improvement sessions at MISD.
<b>May 1</b>	Professional development requests due to the Office of Federal and State Programs for inclusion in Title II grant application. All PD funded with Title II must be included in the school and district improvement plans.
<b>May 1</b>	Title I and Section 31a At-Risk budget requests due to the Office of Federal and State Programs, along with supporting program planning documents from the school level team.
<b>June 1</b>	Draft of school improvement plan due to the Office of Federal and State Programs before summer vacation.

# Appendix B

Michigan Department of Education Program  
Planning Tool

**Michigan Department of Education  
PLANNING TOOL  
Prepared by [Insert team members]**

**Description**

**Title:**

**Brief description:**

**Need being  
addressed:**

**Reason for selection, including intended results:**

**Research citation and brief summary:**

**1. Readiness: How will we ensure readiness for implementing the strategy, program, or initiative?**

IN AN IDEAL PROGRAM/STRATEGY/INITIATIVE, stakeholders are well-prepared to implement. They have read and can articulate the research foundation, and regularly use the terms in conversation with each other, students, and with parents. Staff, students and parents express a high level of interest in, support for and commitment to the program/strategy/initiative. Specific concerns have been identified and solutions have been planned/implemented. Staff is able to seamlessly integrate the program within the context of other building/district initiatives.

<b>a) What evidence will we/do we have that stakeholders (staff, parents, students) understand the need and can articulate the research behind the decision to implement?</b>
<b>b) What evidence will we/ do we have that stakeholders have a shared vision and purpose and are strongly committed to it?</b>
<b>c) What evidence will we/do we have that stakeholder (staff, parent, and student) concerns have been identified and addressed?</b>
<b>d) What evidence will we/do we have that staff and administrators are able to integrate this new work with existing work?</b>

**Suggested Evidence for Question 1:**

- Meeting agendas/minutes
- Books/papers about the program
- Staff surveys
- SI Plan elements
- Professional development materials
- Conference/workshop attendance
- Data collection plan; data analysis work
- Stakeholder survey results
- Suggestion box ideas collected
- SI team agendas
- Focus group interviews

**2. Knowledge and Skills: How will we ensure that staff and administrators have the knowledge and skills to implement the strategy/program/initiative?**

IN AN IDEAL PROGRAM/STRATEGY/INITIATIVE, personnel are able to clearly articulate what successful implementation looks and sounds like and how specific practices will change as a result of its implementation. Staff and administrators can articulate specific outcomes and specific criteria for evaluation. Personnel can demonstrate their ability to apply the knowledge and skills required to successfully implement with fidelity, and professional learning opportunities are provided to address gaps in knowledge and skills.

a) What evidence will we/do we have that staff and administrators have a vision for how practice will change as a result?
b) What evidence will we/do we have that administrators have the knowledge and ability to monitor and assess the effectiveness?
c) What evidence will we/do we have that there are sufficient opportunities for staff to learn essential knowledge and skills, including the non-negotiable or acceptable variations of the elements?
d) What evidence will we/do we have that staff have the ability to apply the acquired knowledge and skills?

**Suggested Evidence for Question 2:**

- Minutes of professional conversations
- Self-assessment checklists,
- Staff surveys,
- Superintendent or administrator observations/ walkthroughs
- Professional learning agendas, sign-in sheets
- Program simulations, administrator observations

**3. Opportunity: How will we ensure that there is opportunity for implementation with fidelity of the strategy/program/initiative?**

IN AN IDEAL PROGRAM/STRATEGY/INITIATIVE, building and district administrators provide significant support for implementation. Sufficient funds have been allocated and continue to be managed by building principal and or director. Adequate resources are available for full implementation including time for staff collaboration in various forms. Clearly defined structures/protocols are in place to collect and review formative implementation data.

a) <b>What evidence will we/do we have there is sufficient administrative support to achieve the intended results?</b>
b) <b>What evidence will we/do we have there is sufficient professional learning during implementation, e.g. modeling/coaching?</b>
c) <b>What evidence will we/do we have there are sufficient resources – including financial and time - to achieve the intended results?</b>
d) <b>What evidence will we/do we have that there is opportunity for staff collaboration?</b>
e) <b>What evidence will we/do we have that structures are in place to collect and review implementation data?</b>

**Suggested Evidence for Question 3:**

- Agendas/minutes
- Action plans
- Email correspondence
- Focus group and/or anonymous surveys
- Budget sheets
- Logs, school schedules
- Inventories
- Curriculum pacing guides
- Collaboration models (such as Professional Learning Communities, Collaborative Action Research, Lesson Study Teams)
- Staff meeting results
- Protocols for reviewing formative assessments

**4. Implementation with Fidelity: How will we ensure that the program/strategy/initiative will be implemented as intended?**

IN AN IDEAL PROGRAM/STRATEGY/INITIATIVE, all personnel implement with fidelity according to the research, carrying out responsibilities by their proposed timelines. They use clearly defined protocols to collect and review formative implementation data to identify unintended consequences. Program leaders consider adjustments guided by implementation data while maintaining the integrity of results.

a) <b>What evidence will we/do we have that there will be fidelity of implementation of the non-negotiable or acceptable variations of the elements of the program/strategy/initiative including timelines and responsibilities, and that implementation data will be collected on a regular basis?</b>
b) <b>What evidence will we/do we have that unintended consequences will be monitored and considered?</b>
c) <b>What evidence will we/do we have that interim adjustments will be considered based on implementation and impact data?</b>

**Suggested Evidence for Question 4:**

- Principal’s walkthroughs
- Number of staff implementing with fidelity
- Model lessons
- Surveys
- Coaching schedule
- Agendas and minutes of common planning time/meetings
- Record of funds used
- Lists of acquired resources
- Focus group interviews
- Debriefing following model lessons
- Collegial observations/visits
- Training agendas & material
- Program Time Line

**5. Impact: How will we ensure a positive impact on student achievement?**

IN AN IDEAL PROGRAM/STRATEGY/INITIATIVE, the school’s achievement results on state or district wide assessments meet proficiency standards. Achievement gaps between each of the relevant subgroups and their counterparts have been narrowed as proposed in the School Improvement Plan’s measurable objectives. Interim assessment results indicate progress toward proficiency for all students to the satisfaction of all stakeholders.

<b>a) What will we do to ensure that we will achieve the measureable objective for all students when compared to baseline state and local data?</b>
<b>b) What will we do to ensure achieving the measureable objective for each of the subgroups and their counterparts when compared to baseline state and local data, including narrowing</b>
<b>c) What will we do to ensure stakeholder satisfaction with the results?</b>

If you have questions regarding this Tool, contact Shereen Tabrizi, Ph.D. Office of Field Services-MDE at [TabriziS@michigan.gov](mailto:TabriziS@michigan.gov)

# Appendix C

Michigan Department of Education Program  
Evaluation Tool

**Michigan Department of Education  
EVALUATION TOOL  
Prepared by [Insert team members]**

**Description**

**Title:**

**Brief description:**

**Need being  
addressed:**

**Reason for selection, including intended results:**

**Research citation and brief summary:**

**Impact: What was the program/strategy/initiative's impact on students?**

IN AN IDEAL PROGRAM/STRATEGY/INITIATIVE, the school's achievement results on state or district wide assessments meet proficiency standards. Achievement gaps between each of the relevant subgroups and their counterparts have been narrowed as proposed in the School Improvement Plan's measurable objectives. Interim assessment results indicate progress toward proficiency for all students to the satisfaction of all stakeholders.

<b>a) What is the evidence and what does it show regarding achievement of the measureable objective for all students when compared to baseline state and local data?</b>
<b>b) What is the evidence and what does it show regarding achievement of the measureable objective for subgroups and their counterparts when compared to baseline state and local data?</b>
<b>c) What is the evidence and what does it show regarding stakeholder (staff, parents, students) satisfaction with the results?</b>

**Conclusion: If objectives were met, should the strategy/program/initiative be continued or institutionalized?**

- a) What is the evidence and what does it say regarding whether this was the right program/strategy/initiative to meet your needs?
- b) What is the evidence and what does it say regarding whether the benefits of the program/strategy/initiative are sufficient to justify the resources it requires?
- c) What adjustments if any might increase its impact while maintaining its integrity?
- d) What is needed to maintain momentum and sustain achievement gains?
- e) How might these results inform the School Improvement Plan?

If objectives **were not met**, consider the following analysis:

**1. Readiness: What was the readiness for implementing the program/strategy/initiative?**

IN AN IDEAL PROGRAM/STRATEGY/INITIATIVE, stakeholders are well-prepared to implement the program. They have read and can articulate the research foundation, and regularly use the terms in conversation with each other, students, and with parents. Staff, students and parents express a high level of interest in, support for and commitment to the program. Specific concerns have been identified and solutions have been planned/ implemented. Staff is able to seamlessly integrate the program within the context of other building/district initiatives.

a) <b>What is the evidence and what does it show regarding stakeholder understanding of the need as well as stakeholder ability to articulate the research regarding the choice of the program/strategy/initiative?</b>
b) <b>What is the evidence and what does it show regarding stakeholders having a shared vision and purpose for the work and a strong commitment to the program/strategy/initiative?</b>
c) <b>What is the evidence and what does it show regarding how stakeholder concerns were identified and addressed?</b>
d) <b>What is the evidence and what does it show regarding the ability of staff and administrators to integrate the program/strategy/initiative with existing work?</b>

**Suggested Evidence for Question 1:**

- Meeting agendas/minutes
- Books/papers about the program
- Staff surveys
- SI Plan elements
- Professional development materials
- Conference/workshop attendance
- Data collection plan; data analysis work
- Stakeholder survey results
- Suggestion box ideas collected
- SI team agendas
- Focus group interviews

Given the evidence you've assembled, choose one overall self-assessment for Question 1:

<b>What was the readiness for implementing the program/strategy/initiative?</b>			
Interest and/or commitment were low.	Some promising elements exist, but were mixed with major gaps in knowledge or confidence.	Support and commitment were generally high, but some concern or work remains.	Stakeholders were fully prepared to implement.
<b>NEXT STEPS: What action steps are needed to increase readiness?</b>			

**2. Knowledge and Skills: Did staff and administrators have the knowledge and skills to implement the program/strategy/initiative?**

IN AN IDEAL PROGRAM/STRATEGY/INITIATIVE, personnel are able to clearly articulate what successful implementation looks and sounds like and how specific practices will change as a result of its implementation. Staff and administrators can articulate specific outcomes and specific criteria for evaluation. Personnel can demonstrate their ability to apply the knowledge and skills required to successfully implement with fidelity, and professional learning opportunities are provided to address gaps in knowledge and skills.

a) What is the evidence and what does it show regarding staff and administrators’ vision for how practice would change as a result of the program/strategy/initiative?
b) What is the evidence and what does it show regarding administrator knowledge and ability to monitor and assess the effectiveness of the program/strategy/initiative?
c) What is the evidence and what does it show regarding the sufficiency of opportunities for staff to learn knowledge and skills identified as essential (the non-negotiable or acceptable variations of the elements) to the program/strategy/initiative?
d) What is the evidence and what does it show regarding staff ability to apply the acquired knowledge and skills?

**Suggested Evidence for Question 2:**

- Minutes of professional conversations
- Self-assessment checklists,
- Staff surveys,
- Superintendent or administrator observations/ walkthroughs
- Professional learning agendas, sign-in sheets
- Program simulations, administrator observations

Given the evidence you’ve assembled, choose one overall self-assessment for Question 2:

<b>Did participants have the knowledge and skills to implement the program/strategy/initiative?</b>			
Participants were beginning to acquire the necessary knowledge and skills.	A solid start was documented, but many skill levels and much knowledge need to be acquired.	Much knowledge and skill were evident, but few skills (or some knowledge base) still need work.	Participants had sufficient knowledge and skills to succeed.
<b>NEXT STEPS: What action steps are needed to improve participants’ knowledge and skills?</b>			

**3. Opportunity: Was there opportunity for high quality implementation of the program/strategy/initiative?**

IN AN IDEAL PROGRAM/STRATEGY/INITIATIVE, building and district administrators provide significant support for project implementation. Sufficient funds have been allocated and continue to be managed by building principal and or program director. Adequate resources are available for full implementation including time for staff collaboration in various forms. Clearly defined structures/protocols are in place to collect and review formative implementation data.

a) <b>What is the evidence and what does it show regarding the sufficiency of administrative support to achieve the intended results?</b>
b) <b>What is the evidence and what does it show regarding the sufficiency of professional learning during implementation, e.g. modeling/coaching?</b>
c) <b>What is the evidence and what does it show regarding the sufficiency of resources – including financial and time - to achieve the intended results?</b>
d) <b>What is the evidence and what does it show regarding staff collaboration in support of the program/strategy/initiative?</b>
e) <b>What is the evidence and what does it show regarding structures being in place to collect and review implementation data?</b>

**Suggested Evidence for Question 3:**

- Agendas/minutes
- Action plans
- Email correspondence
- Focus group and/or anonymous surveys
- Budget sheets
- Logs, school schedules
- Inventories
- Curriculum pacing guides
- Collaboration models (such as Professional Learning Communities, Collaborative Action Research, Lesson Study Teams)
- Staff meeting results
- Protocols for reviewing formative assessments

Given the evidence you've assembled, choose one overall self-assessment for Question 3:

<b>Was there opportunity for high quality implementation?</b>			
Opportunity and resources were just beginning to align in support of the program.	Basic resources and opportunities were available, but significant gaps need to be filled.	Many necessary resources were aligned with program goals, but more are needed.	Necessary support and resources (time, funding, and attention) were solidly in place.
<b>NEXT STEPS: What action steps are needed to ensure opportunity for high quality implementation?</b>			

**4. Implementation with Fidelity: Was the strategy/program/initiative being implemented as intended?**

IN AN IDEAL PROGRAM/STRATEGY/INITIATIVE, all personnel involved in the program implement the strategies with fidelity according to the research, carrying out responsibilities by their proposed timelines. They use clearly defined protocols to collect and review formative implementation data to identify unintended consequences. Program leaders consider adjustments guided by implementation data while maintaining the integrity of results.

a) What is the evidence and what does it show regarding the fidelity of implementation of the non-negotiable or acceptable variations of the elements of the program/strategy/initiative, including timelines and responsibilities?
b) What is the evidence and what does it show regarding unintended consequences that may have occurred?
c) What do student achievement results suggest for implementing/modifying the program/strategy/initiative? How might these affect the integrity of the results?

**Suggested Evidence for Question 4:**

- Principal’s walkthroughs
- Number of staff implementing with fidelity
- Model lessons
- Surveys
- Coaching schedule
- Agendas and minutes of common planning time/meetings
- Focus group interviews
- Debriefing following model lessons
- Collegial observations/visits
- Training agendas & material
- Program Time Line
- Lists of acquired resources

Given the evidence you’ve assembled, choose one overall self-assessment for Question 4:

<b>Was the program implemented as intended?</b>			
Parts of the program were working, but others have yet to be implemented.	The overall design was in place, but variations in practice were evident and may be adversely affecting results.	Critical elements have been implemented, but work on consistency and depth remains.	All research-based elements have been implemented with fidelity following the proposed timelines.
<b>NEXT STEPS: What action steps are needed to ensure faithful implementation of program</b>			

If you have questions regarding this Tool, contact Shereen Tabrizi, Ph.D. Office of Field Services-MDE at [TabriziS@michigan.gov](mailto:TabriziS@michigan.gov)

# Appendix D

Oak Park Schools Business Office  
Grant Procedures

The following processes are for Categorical State and Federal Grants

**A. Financial Management Systems**

The District uses the Wayne RESA SMART Financial Software to account for all grant revenues and expenditures. Extensive procedures are documented in the SMART software usage as well as District monthly close procedures and accounting procedures manual documenting appropriate accounting procedures.

**B. Payments**

Payments are made after service is received. Payments are made from purchase order packing slips, credit cards, and salary payments. See the relevant section for purchases or payroll for procedures relative to order items or obtaining payroll payments.

**C. Allowable Costs and Cost Principles:**

**Budget:**

During the budget process, allowable costs for State and Federal grants are reviewed and confirmed by the Supervisor of Federal & State Programs and the Finance Manager. After the start of our fiscal year, the payroll system is set to record relevant personnel salaries to appropriate grant accounts and adjusted as needed with PARS reports periodically before submission of cash request from MDE.

Allowable costs are identified and costs are then generally identified up to the amount of the year's allocation. The Finance Manager and Executive Director of Budget and Finance review that personnel are charged to the appropriate accounts/grants.

In general, we develop our plan for grants to most of all funding for staff and the remainder for materials/supplies. We chose to use the funds for reading, math and language art teachers and related teacher assistants, tutoring, curriculum intervention, and other grant materials/supplies. The subsequent budget review mid-year confirms costs are within the estimated allocation.

The Superintendent, Supervisor of Federal & State Programs, Executive Director of Budget and Finance and Finance Manager have read numerous communications from MDE, attended updates and workshops regarding allowable costs and review materials posted on the MDE website to be able to identify allowable costs that could be charged to the program. We also review proposed items with MDE prior to implementation. The District reviews relevant MDE checklists for appropriate uses of funds.

Further, every line item is reviewed by MDE. All new items are also discussed with MDE and any adjustments are made as recommended by MDE. Reviews between actual and budget are performed periodically by the Finance Manager and Supervisor of Federal & State Programs Program.

The accounting system accounts for expenditures for personnel as direct charges to the grant with associated payroll fringe benefits.

**D. Period of Availability:**

At Risk program is does not require an annual application. The district submitted a 1994-95 application for Section 31a Funds. The Title programs require an annual application that is submitted annually.

A final cost report is submitted per State guidelines at the end of each fiscal year.

**E. Procurement**

**E1. Supplies/Materials:**

1. Describe your process for purchasing and receiving items:  
In general, we develop our plan for the State and Federal grant to use most funding for staff.

As with any other District purchases of supplies and materials:

- a) A system of purchase orders and check requests is used to ensure purchasing accountability within the school district that is consistent with the auditor's most recent written advice.
- b) Purchases by purchase order
  - Purchases are requested by the program administrator (i.e Director) or professional staff in consultation with the program administrator and approved by the building principal before orders are processed.
  - Purchase orders are initiated by the at the building or program level (i.e. Title I Teacher, Project 21 Director, Special Ed Director)
  - Purchase orders are approved by the Building Principal, Supervisor of Federal & State Programs, and by the Finance Manager.
  - Accounting system approval is generated by the Business Office after receipt of purchasing documentation, approval of program director, and review for compliance with Board Policy and Grant requirements
  - Purchases are then initiated by the accounts payable clerk with the vendor
  - After items are received, the recipient of the grant funded items signs an approval to process payment, either the receiver copy of the purchase order, by the packing list or signature on the invoice.

c) Purchases by Check Request.

- Purchases by Check Request offer an alternative to existing procurement processes and provide a convenient, efficient method of purchasing goods and services and are not used to circumvent the general purchasing procedures required by Michigan law and Board policy.
- Items purchased with grant funding without a purchase order require original cash receipts, internet confirmation, packing slips, and evidence of employee credit card charges for items. A Check Request form is completed at the building – department level and is reconciled to submitted receipts. The building / program administrator approves purchases and submits requisition to the Business Office for review.
- Backup is reviewed for compliance with Board Policy and Grant requirements and approval is issued by the Finance Manager.
- Purchases for grant-related items are reviewed with the Supervisor of Federal & State Programs or the Finance Manager prior to acquisition by a building principal or program administrator.

2. What documentation do you keep on file for supplies and materials ordered and received?

a) Purchases by purchase order

- Administrator approval of purchase order issued.
- Copy of purchase order, packing list (if received), invoice, administrator approval of invoice are to be retained by the department/building placing order
- Copy of check is kept in the business office along with supporting invoice

b) Purchased by Check Request

- Administrator approval of Check Requisitions issued.
- Copy of original sales receipts, invoices, credit card statements.
- Copy of check is kept in the business office along with supporting invoice

3. Are supplies/materials purchased specifically for grants, charged directly to the grant accounts in the general ledger?

Yes. Administrative and/or clerical errors may result in correcting journal entries and support is kept as back up for these corrections.

4. How do you ensure that supplies/materials purchased are used for grant-eligible costs?

The Grant Application is fairly specific regarding items that can be purchased with grant fund. These items are determined by the School Improvement/District Improvement Plans as approved by the building administrator, Supervisor of Federal & State Programs and MDE Consultant. All items are approved by Supervisor of Federal & State Programs and the Finance Manager to be used by students who are identified as being grant eligible.

**E2. Contracted Services:**

1. Describe your process for procuring contracted services.  
Need would be identified by the Building Principal and Supervisor of Federal & State Programs. If cost is identified in grant applications and approved by MDE appropriate vendors would be contacted and quotes or bids would be procured as needed.
2. Describe your bidding process, if applicable.

**The district follows all legally - required State and Federal bidding requirements as needed. The following are the steps:**

- a) Items to be purchased are identified by building principal or Supervisor of Federal & State Programs. Instructional and/or departmental staff (i.e. Technology) that will be using items are consulted to preference and specific equipment criteria desired (not necessarily used in the actual RFP but if possible incorporated into the bid process).
  - b) Items are advertised, bids accepted and opened per required guidelines. Bids are evaluated and awarded at (typically) the next Board meeting.
  - c) Purchase order is created. Letters are sent to each bidder to confirm the vendor's award, describe the selection process and their status.
3. **How do you ensure that the vendors are not suspended or debarment from federal grants?**
  4. We search the System for Awards Management System ([www.SAMS.gov](http://www.SAMS.gov)) for all purchases by federal grants and all purchases exceeding \$20,000
  5. What documentation do you keep on file for contracted services when services are rendered and paid?
    - Copy of Purchase Order if issued
    - Vendor invoice
    - Administrator approval of payment
    - Copy of check
  5. How do you ensure that you are in compliance with the Davis-Bacon Act?  
Not Applicable

**Other transactions (conferences, travel, etc.):**

1. Describe your process for procuring travel, conferences.  
The District uses a Professional Activity form to procure travel and conferences.
2. How do you ensure that these activities are related to the grant?  
The Supervisor of Federal & State Programs would review and approve to ensure compliance with grant requirements. The Finance Manger assigns account number and if activity is allowable under the grants identified.

### **Capital Outlay:**

1. Describe your process for purchasing capital outlay items.  
In general, we develop our plan for grants to use most funding for staff and staff. If capital outlay is purchased, the District reviews the strict guidelines and procedures of each grant.
2. Describe your process for maintaining inventory for capital outlay purchases.  
The buildings track all items purchased with grant funds to ensure the items are used appropriately for applicable students.  
All technology purchases over \$100 are asset tagged with an ID number and spreadsheets are kept on the locations, cost, date acquired and tag numbers.

### **E3. Procurement and Suspension and Debarment:**

We search System for Awards Management System ([www.SAMS.gov](http://www.SAMS.gov)) for all purchases by federal grants and all purchases exceeding \$20,000.

### **F. Financial Reporting:**

The Finance Manager gathers information for the final report from the General Ledger. All expenditures reported are compared to the approved budget. The Supervisor of Federal & State Programs follows approval due date's schedules for all reporting as documented by MDE. The Executive Director of Business and Finance reviews and certifies all MDE submissions

The final allocations from grants are confirmed and then costs are identified to support the revenue received and expected to be received.

A final expenditure report is prepared using general ledger costs are identified by state code.

All grants are reported in a separate fund and separate grant accounts to ensure that all costs and revenues are segregated.

### **G. Record Retention**

Payroll records are maintained for seven years as well as electronic versions are kept on the Wayne RESA Smart Finance Program for many years. Checks, Purchase Orders, Journal Entries and other grant documents are maintained for seven years.

### **H. Matching Level of Effort, Earmarking:**

Most grants have no requirements for matching level of effort. The IDEA grant has matching levels of effort which are reviewed annually with the District audit procedures.

**I. Program Income:**

Not applicable

**J. Equipment and Real Property Management:**

In general, we develop our grants to use most funding for staff. The following outlines the procedures the district uses to record the transactions: Large items purchased by the district are required to have a fixed asset inventory tag and are recorded as purchased with federal funds in the asset inventory tracking software. In addition, a special sticker has been added to each item indicating the source of funds used to purchase the item.

**K. Copyrights**

Not applicable

**L. Monitoring/Reporting Program Performance**

The Supervisor of Federal & State Programs and the Superintendent monitor the performance of staff and programs offered on a continual basis. Each program is further reviewed annually to determine the relevance of each program and determination of its continuance for budget funding during the annual budget process. Each program is reviewed at least annually to determine if it is working in a satisfactory manner and it is the best proposed use of funds based upon the grant and alternative potential uses.

**M. Cash Management:**

1. Describe your process for drawing funds.

- a. One eleventh of the State's estimated At Risk grant is received through the State Aid payment monthly. Expenditures are monitored and finalized each year to ensure sufficient funds are expended to support the revenue received. If revenue ever exceeds costs it is shown as deferred revenue and reported accurately on the At Risk year-end report.
- b. For federal grants, the dollars are expended and periodically input to the cash management system for reimbursement of actual expenditures to date. Funds are requested periodically based on actual expenditures. If excess funds are ever received, the District will contact MDE and return funds immediately.

2. Describe your process for receipt of funds.

- a) ACH received into district's general fund checking account from the State on a monthly basis for state grants and a similar ACH for federal funds when reimbursement is sought through the Cash Management process of the state.

3. How do you ensure that you are spending the funds timely? (within 3 days of receipt?)

Not applicable

4. Is this process the same for all grants?

No. State grants are received monthly. Federal grants are requested only after district expends funds.

5. Describe your process to prepare the Financial Expense Report.

- a. After the close of the fiscal year, print a summary and detailed General Ledger for grants
- b. Compare final General Ledger to the grant allocation and reimbursements received.
- c. Enter data from final General Ledger into MEGS FER report

6. Are these reports based on actual expenditures in the GL Summary?

Yes

7. Does the final GL Summary include funding sources other than the grant?

If expenditures exceed the final allocation then the District's general fund covers the balance of the expenditures, which is generally not the case. Otherwise, the GL Summary will not include other income sources.

#### **N. Conflict of Interest**

The District has conflict of interest policies that allow no employee to benefit from District expenditures.

#### **O. Payroll:**

1. Describe your process for ensuring that staff charged to the grants is qualified for the positions (categories) that they are charged to.

The Supervisor of Federal & State Programs works with the business office to create a realistic budget.

Specific positions are identified as grant positions and are awarded based on this budget. The district assumes the risk of over-spending the grant and the possibility staffing changes may need to occur at the beginning of the school year if the entire expected grant award does not come to fruition.

Payroll is notified through correspondence by the Finance Manager of grant assignments. Confirmations are received by the Human Resource Department in the form of a Personal Action that identifies hourly rate/salary, grant and account number to charge salary expenses the Supervisor of Federal & State Programs along with the specific building principal interview and hire all new grant staff. They assess the credentials of all employees in the grants.

2. Describe your process for ensuring that professionals (paraprofessionals/teachers, etc.) charged to the grants are qualified for the positions they are charged to.  
The Supervisor of Federal & State Programs and building principal interview and hire all grant staff. They assess the credentials of all employees in the grants.
3. Describe your process for ensuring that administrators charged to the grant are qualified for the grant?  
No administrator costs are charged to At Risk. Any administrators charged to other grants would need review by the Supervisor of Federal & State Programs, Finance Manager and on occasion the Superintendent prior to being charged to the grant. Also, review with MDE is performed prior to grant approval.
4. Describe your process for ensuring that semi-annual certifications or personal activity reports are on file for employees charged to the grant.

The District has developed a procedure to ensure that all applicable staff is on semi-annual certification or PARS. All 100% staff is given semi-annual certification and all multi-charged staff has PARS. The Finance Manager is responsible for completing the semi-annual certification and forwarding to the proper director for approval. Staff required to complete PARS and instructed at the beginning of the school year of the procedure. Periodically the staff forwards the PARS to the Supervisor of Federal & State Programs for review to ensure proper percentages are being maintained.

5. Describe your process for ensuring that all teachers and professionals charged to the grant have background checks.

All newly hired employees are required to submit fingerprints prior to working. In addition, all newly hired employees complete an authorization and release to disclose unprofessional conduct under Public Act 189 and 397. Former employers are contacted.

#### **P. Timekeeping Requirements**

Payroll procedures have been developed to document the timekeeping requirements for payroll purposes. Timekeeping regarding PARS are discussed with staff for reporting purposes Certification for staff charged 100% to a grant is required for all grants. For staff charged to more than one grant or other source, PARS are required.

**Q. Ancillary Services:**

Not Applicable.

**R. Proportionate Share:**

Not applicable.

**S. Eligibility:**

Title I building staff track list of students who have been identified as being eligible for Title I or At Risk using the matrix provided by the State. In the Zangle pupil accounting software, there is a field that captures this data and lists are produced to record eligibility.

**T. Real Property Acquisitions Relocation Assistance:**

Not applicable

**U. Sub-recipient Monitoring:**

Not applicable

**V. Special Tests and Provisions:**

None

**W. Further Grant Management Procedures**

**W1. Grant Application**

Grants are applied for using MDE policies and procedures and relevant deadlines. All state and federal guidelines must be followed in the application process. Please see the relevant grant MDE guidelines and contact the MDE representatives for assistance.

**W2. Budgets**

Budgeting procedures as delineated above under section C should guide the budgeting procedures of the District.

**W3. Communication**

Communication of the grants between the Superintendent, Curriculum Office, Business Office and buildings is very important. Appropriate grant procedures require coordination between all relevant parties to ensure that all procedures and policies are appropriately applied. Development of grants and spending of grant funds will be a coordinated event throughout the year.