TITLE II
SAMPLE MONITORING
DOCUMENTATION

D21 – D24

2021-2022

Sample Monitoring Documentation
for Title II Programs

Title II, Part A is a U.S. Department of Education (USED) grant program that provides supplemental funding to help support effective instruction. The USDE awards Title II, Part A funds to state educational agencies (SEAs), such as the North Dakota Department of Public Instruction (NDDPI), which then sub-grant funds to local education agencies (LEAs).

The Title II program offers an LEA the flexibility to design and implement a wide variety of activities that allows the promotion of teaching staff meeting applicable state certification and licensure requirements and increases the number of teachers who are effective in improving student achievement consistent with state learning standards. Funds can also be used to provide principals and other school leaders with the knowledge and skills necessary to lead their schools' efforts in increasing student achievement.

The NDDPI is required by law to monitor local Title II programs to ensure compliance with procedures and regulations. It is the State's responsibility to ensure that districts, and schools are held accountable concerning Title II and *Every Student Succeeds Act* (ESSA) regulations.

The purpose of this document is to assist schools and districts as they complete the Federal Title Programs monitoring process. This document walks through each requirement outlining details on the requirement itself, necessary documentation, special alerts to consider, and additional resources available. Below is a summary of each category.

"Requirement" Section

This section outlines the specific requirements mandated by federal and state law. This section explains the requirement's rationale.

"Documentation" Section

This section explains the necessary documentation required to meet the monitoring requirement adequately.

"Alerts" Section

This section offers relevant information relating to the requirement. This section may simply indicate that the requirement relates to other federal programs or outlines common submission or documentation issues.

"Resources" Section

This section outlines current resources available on the particular requirement.

Title II Programs
General Information

Title II Use of Funds

In general, the purpose of Title II is to meet the following goals:

- Increase student achievement consistent with 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.

The Every Student Succeeds Act (ESSA) clearly outlines the allowable uses of Title II funds (Sec. 2101) outlined in each category below.

High-Quality Professional Development – ESSA promotes the implementation of high-quality, personalized, evidence-based professional development for teachers, instructional leadership teams, principals, or other school leaders focused on improving teaching and student learning. Under ESSA, professional development should be sustained, personalized, and job-embedded initiatives that address identified gaps rather than stand-alone, one-day, or short-term professional development. ESSA states this professional development may include training teachers, principals, or other school leaders to do the following:

- Effectively integrate technology into curricula and instruction,

- Use data to improve student achievement (ensuring individual student privacy under FERPA),

- Effectively engage parents, families, and community partners and coordinate services between school and community,

- Help all students develop the essential skills for learning readiness and academic success,

- Develop policy with school, local educational agency, community, or State leaders, and

- Participate in opportunities for experiential learning through observation.

Evaluation/Support Systems – ESSA supports the development and improvement of a rigorous, transparent, and fair evaluation and support system for teachers, principals, or other school leaders based on evidence of student achievement and may include student growth. It should also include multiple measures of educator performance and provide clear, timely, and helpful feedback to teachers, principals, or other school leaders.

Effective Teaching of English Language Learners – ESSA supports the development of programs and activities that increase the ability of teachers to teach English language learners effectively.

Effective Teaching of Children with Disabilities – ESSA supports the development of programs and activities that increase the ability of teachers to effectively teach children with disabilities, including children with significant cognitive disabilities. This may include the use of multi-tier systems of support and positive behavioral intervention and supports.

Increased Knowledge/Ability to Teach Early Childhood – ESSA promotes the development and use of programs and activities geared toward improving 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.

This may include increasing 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.

Effective Instruction of Science, Technology, Engineering, Arts and Math (STEAM) – ESSA supports the development and provision of professional development 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, arts, mathematics, and computer science.

Implementation of Formative Assessments – ESSA supports the training, technical assistance, and capacity-building in LEAs 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.

Supporting Students Affected by Trauma and/or Mental Illness – ESSA endorses the provision of in-service training for school personnel in techniques and support related to identifying and supporting students affected by trauma or mental illness, including the use of referral mechanisms, partnerships with outside organizations, or addressing school conditions for learning such as safety, peer interaction, drug and alcohol abuse, and chronic absenteeism.

Identification and Support of Gifted Students – ESSA supports the provision of training to identify 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 the following examples:

- Enrichment, acceleration, and curriculum compacting activities.
- Dual or concurrent enrollment programs in secondary schools and post-secondary education.

Instructional Services Provided by Libraries – ESSA supports professional development intended to improve the instructional services provided by effective school library programs.

Training to Recognize/Prevent Sexual Abuse – ESSA supports training 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.

Feedback Mechanisms to Improve Working Conditions – ESSA supports the development of feedback mechanisms to improve school working conditions, including periodically and publicly reporting results of educator support and working conditions feedback.

Career Readiness Education – ESSA supports training teachers, principals, or other school leaders on strategies to integrate rigorous academic content and provide effective career/technical education and work-based learning to help prepare students for post-secondary education and the workforce.

Recruiting/Retaining Effective Teachers – ESSA supports the development and implementation of initiatives to assist in recruiting, hiring, and retaining effective teachers, particularly in 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 within-LEA equity in the distribution of teachers, such as the following examples:

- Providing expert help in screening candidates and enabling early hiring.

- Offering 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.

- Teacher, paraprofessional, principal, or other school leader advancement and professional growth, emphasizing leadership opportunities, multiple career paths, and pay differentiation.

- New teacher, principal, or other school leader induction and mentoring programs designed to improve classroom instruction, student learning and achievement, and increase the retention of effective teachers, principals, or other school leaders.

Recruiting Individuals from Other Fields – ESSA supports recruiting mid-career professionals from other occupations, former military personnel, and recent graduates of institutions of higher education with records of academic distinctions who demonstrate potential to become effective teachers, principals, or other school leaders.

Reducing Class Size – ESSA supports the use of Title II funds to reduce class size to an evidence-based level, to the extent the State (in consultation with LEAs) determines that such evidence is reasonably available to improve student achievement through the recruiting and hiring of additional effective teachers.

Carrying Out Other Evidence-Based Activities – ESSA supports carrying out other evidence-based activities to the extent the State (in consultation with LEAs) determines that such evidence is reasonably available and identified by the LEA that meets the purpose of Title II.

Title II Supplement, Not Supplant

ESSA maintains the "supplement, not supplant" provision for Title II funds (ESSA Sec. 2301). The requirements of this provision indicate Title II funds must be used to supplement, and not supplant any non-federal funds that would otherwise be used for Title II activities.

In other words, districts may only use their Title II funds to supplement and increase the level of services available for Title II-like activities. In no case may Title II funds be used to supplant (or take the place of) funds from non-federal sources.

This provision is to ensure that federal funds pay for something "extra" in the LEA. The LEA may not decrease the amount of state or local funds used to pay the cost of an activity simply because of the availability of federal Title II funds.

For the Title II program, supplanting is presumed when any of the below instances occur:

- Title II funds are used to provide services the district is required to make available or provide under federal, state, or local law/policy.
- Title II funds are used to provide services that the LEA provided with state or local funds the prior school year.
- The same services are being provided in other schools within the LEA that are paid for with state or local funds.

Submission D21 – Recruit and Retain Effective School Personnel

Requirement

Districts prioritizing their Title II funds for the recruitment and retention of effective personnel typically elect to fund activities in one of these categories:

- Retention/Recruitment Incentives – ESSA Section 2103(b)(3)(B) allows the district to implement recruitment 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.

- Leadership Support – ESSA allows districts to use Title II funds to provide effective professional development for school and district leaders.

- Licensure or Coursework Support – Title II funds can be used to support staff in becoming state-certified.

Documentation

Depending on the type of activity the district invested in, varying documentation may need to be provided. The examples below are customized based on the use of funds.

Retention/Recruitment: If the district used Title II funds to pay for recruitment and or retention of staff, the narrative response provided must include:

- How the district is complying with NDCC Section 15.1-09-33.1,

- A copy of the district's board approved policy outlining the guidelines for issuing signing bonuses to ensure a consistent, objective process, and

- How this investment has targeted those areas most in need.

Leadership Support: If the district used Title II funds to invest in leadership at the school or district level, the narrative response should outline and provide:

- Evidence that new school and district leaders are provided with professional learning opportunities to understand and support their local needs (i.e., mentoring program, induction plan, personalized PD plan)

- How does the leadership support provided meet the ESSA definition of professional development?

Licensure or Coursework Support: If the district used Title II funds to support local staff in meeting licensure or coursework requirements, documentation should reflect on:

- What grades/subject areas have been most challenging to fill with properly certified staff?

- How has the district addressed these issues?

- How have Title II funds (or other funds/strategies) been used to address these needs?

Alerts

No alerts available for this submission.

Resources

[NDCC 15.1-09-33.1](#)

[Title II Website](#)

[Professional Development Definition](#)

Submission D22 – Professional Development

Requirement

ESEA Sec 8101(42) defines the term professional development as activities that adhere to the following guidelines:

- Activities are an integral part of the 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

- Activities are sustained (not stand-alone, one-day, or short-term workshops), intensive, collaborative, job-embedded, data-driven, and classroom-focused.

The statute goes on to summarize professional development activities.

Documentation

District documentation is needed to cite the evidence aligned to the use of Title II funds for professional development. The following question MUST be addressed in the district's narrative response:
- How does the professional development provided meet the ESSA definition?
- How do the professional development activities expect to have a substantial, measurable, and positive impact on student academic achievement?
- How are professional development activities evaluated? What are the results of past evaluations?

Additional questions to consider may include:
- Describe the annual professional development requirements for educators in the district. Is there a specific plan to monitor the total professional learning throughout the school year?
- What is the district's process to ensure the effectiveness of professional development offerings and initiatives?
- What kinds of professional development offerings are provided for classroom educators during the school year? What is available for principals and other school leaders?
- How will the professional development activities be used to help eliminate achievement gaps between sub-groups?
- What professional development offerings focus on developing teacher and staff capacity for cultural competency and understanding the effects of poverty?
- Does the district provide professional learning opportunities on family and community engagement for staff?

Alerts

No alerts available for this submission.

Resources

Title II Website
Professional Development Definition

D23-D24 Class-size Reduction

Requirement

Keeping in mind that the intent and purpose of Title II, Part A is to strengthen the quality and effectiveness of teachers, principals, and other school leaders, the strategy of class-size reduction, while allowable, has limited impact reaching only a very small percentage of teachers and an even smaller percentage of students. When using funds for class-size reduction, districts must show that there is evidence to suggest that reducing class-size in the circumstance can have a positive impact on student achievement

When using Title II, Part A funds for professional development and class-size reduction, it is required the district only use Title II, Part A funds on evidence-based activities, to the extent that evidence is reasonably available. (ESEA section 2103(b)(3)(D) and (E)).

Class-size reduction is defined as creating additional classes in specific grades/subjects to create small student-to-teacher ratios. The district retains the responsibility to pay for the original classes and Title II funds would pay for the additional supplemental classes. Title II, Part A funding can only be used to pay the salaries of qualified teachers to reduce class size.

LEAs have the flexibility to explore these and other alternatives for reducing class sizes, provided qualified teachers are utilized, and Title II funds are only used to hire staff to reduce class size and the decision to use Title II funds for class size was reviewed by the administration and is justified as an evidence-based practice.

Documentation

See subsequent page.

Alerts

The district must be mindful that class-size reduction supported with Title II, Part A funds must be listed as a strategy to meet the district's prioritized needs as assessed by the district's annual needs assessment.

Resources

Title II Website

Sample Documentation – Submission D23 – Class-size Reduction Worksheet

Documentation for this requirement is submitted in the form of a chart and a narrative.

This documentation must include the grade level, total numbers of students in each grade/class, number of sections, teacher to student ratio and the grade/class supported through class-size reduction strategy.

Class-size Reduction Worksheet – Example

	20xx-20xx Class Size	Number of Sections	Teacher:Student Ratio	Teacher funded through Title II CSR
Grade K	44 students	2	1:22	
Grade 1	41 students	2	1:20	
Grade 2	48 students	3	1:16	1.0 FTE funded with Title II CSR
Grade 3	40 students	2	1:20	
Grade 4	45 students	2	1:22	
Grade 5	46 students	2	1:23	
Grade 6	40 students	2	1:20	
MS/HS Math	145 students	5	1:29	0.5 FTE funded with Title II CSR to reduce middle school math ratio
MS/HS English	125 students	5	1:25	
MS/HS Science	120 students	5	1:24	

Sample Documentation – Submission D24 – Class-size Reduction

Documentation for this requirement will summarize the district's process for determining whether to use Title II funds for class-size reduction and the criteria considered when making this determination.

Class-size reduction must be listed as a strategy to meet the district's prioritized needs as assessed and documented through the district's annual needs assessment.

Additional questions to consider include:

- How do we select schools and/or classes to reduce class size and fund with Title II, Part A funds? Based on the district's needs assessment, schools with the highest level of at-risk populations should be considered.
- What kind of instructional strategies and changes in the delivery of instruction are supported by class-size reduction research making this an evidence-based practice?
- Do all classes across elementary schools within school grade levels have equivalent class sizes?
- Do all content courses have equivalent class sizes within individual middle and high schools and across your LEA?
- Based on student achievement data, have you identified specific student cohorts that would benefit from reduced class size?
- If federal funds have been used in prior years to reduce class size, has the district's class-size reduction strategy demonstrated measurable student achievement over time?
  - The district must consider its student achievement data over a period to continue utilizing Title II funds for class-size reduction. Annually, the data must be used to evaluate the class-size reduction efforts to ensure students are achieving the State's standards and long-term achievement gains for the students participating in the initiative are realized.

Evaluating the effectiveness of the class-size reduction strategy and the corresponding instructional strategies in order to increase student academic achievement must be planned, implemented, and evaluated annually. Here is an example of what might be included in the annual review meeting in addition to data, agenda, minutes, etc.:

Achievement need being addressed	Strategies to address need	Data collected to measure effectiveness	Person responsible for collecting and reporting data	Annual review of results
Increase in reading achievement for students in poverty in grade 2	• Professional learning on guided reading for grade 2 teachers • Reduce teacher to student ratio for grade 2	• Classroom observation data • Student achievement data in reading (state, local)	• Principal • Instructional coach • Testing coordinator	Classroom observations indicated that teachers needed additional supports in order to implement guided reading strategies. 2nd grade PLCs were restructured to allow for this time. The attached data indicates that students with a smaller class ratio are making gains at a faster pace than other grade levels with larger class size.