MEMORANDUM

DATE: May 8, 2008
TO: TechMIS Subscribers
FROM: Charles Blaschke
SUBJ: Suggestions for Approaching Districts With Increased Title I Funding

Attached is a Special Report with suggestions on how to approach districts identified in our April 7th Special Report which are receiving large increases in Title I funding next year. Based upon discussions and questions we have received from some TechMIS subscribers, we have attempted in this Special Report to suggest who at the district level should be approached and what their issues and concerns might be. For schools identified for corrective action or restructuring we’ve also included some suggestions on approaching principals, as well as the types of products they might be most interested in. As always, there are exceptions to the rule.

Please call me directly if you want to discuss any particular suggestions related to your specific products and/or services.
Suggestions for Approaching Districts With Large Title I Increases

A Technology Monitoring and Information Service (TechMIS)

SPECIAL REPORT

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In our April 7th TechMIS Special Report, we identified districts receiving large absolute increases as well as those with a 40 percent or greater percentage increase. These districts should be targeted by subscribers who believe the availability of funding for purchases is of primary consideration. We realize that other factors might take priority, such as personal relationships, satisfied customers, among others. Below, we provide some suggestions on how these districts, particularly those receiving $400,000 or greater increases in Title I funding next year, should be approached.

I. District Title I Office

Over the last ten years, particularly after the enactment of NCLB, there has been a decline of between 10-15 percent in the amount of Title I funds allocated in most districts to Title I schools. This factor, in combination with a need for greater uniformity of curriculum materials and interventions, etc., suggests that the district Title I director and his or her designee are the key decision makers regarding the following issues:

- What types of instructional materials and interventions will be purchased;
- How will set-aside funds for SES, staff development and other purposes be used;
- How will unspent set-aside funds be used at the end of the year or how much will be carried over for next year.

Chief among the questions the Title I director or office will ask include:

- What is the quality of evidence about how effective is the firm’s proposed solution?
- Are the costs “necessary” and “reasonable” (which is primarily a Federally-imposed audit question)?
- How easily does the proposed pricing arrangement (schoolwide license, price-per-student served, annual cost of maintenance and support) fit into the district’s Title I and overall budgeting process?
- How stable is the firm and availability of support staff over the long run?
In addition to selling a solution which is perceived to be effective, sales staff should concentrate on creating a “comfort level” with the district Title I director and office (e.g., no unexpected hidden costs or cost overruns). Consultative selling is critical, particularly among new Title I directors and Title I staff members.

Several points which we have covered in previous TechMIS reports and updates over the last several years may be worth mentioning, depending upon the product and service being offered, including:

- If the amount of unspent funds for SES at the end of the year is greater than 15 percent, the district stands to lose the amount in excess of 15 percent under new Non-Regulatory Guidance, unless it is spent before June 30th or another state deadline.
- If a portion of the ten percent set-aside for staff development (i.e., ten percent of the total Title I budget) is unspent in districts identified for improvement, then all of the unspent allocation must be carried over and added to the ten percent staff development set-aside next year. Hence, a combination of training and support along with “free” materials, packaged as “staff development,” could be purchased.
- If proposed regulations (see May TechMIS memo) are adopted, then next year it will be much more difficult to justify spending unused SES set-aside at the end of the year for other allowable products and services.
- Recent Non-Regulatory Guidance allows after-school operators, funded under 21st Century Community Learning Centers, even if the district operates such programs (perhaps in conjunction with community-based organizations) and if the program is approved by the state, to provide its own SES because it is considered by USED as being legally a “separate” and “distinct” entity.

II. The Assistant Superintendent or District Director of Federal Programs if Both Title I and Special Education Programs Are Under His or Her Responsibility

For firms that sell intervention products and related staff development and support which could be used in implementing Early Intervening Services (EIS) under IDEA and/or Response-To-Intervention (RTI) approaches, the Director of Federal programs should be the initial contact if the products could be used in both special education and in Title I programs. This is particularly true if the district has been told by the state that it must reallocate 15 percent of its IDEA funds for EIS under the August 2006 IDEA final regulations. The most recent CASE survey of RTI adoption found that over 30 percent of districts have been told they must reallocate the entire 15 percent, usually to the office responsible for implementing their Title I program, because the students targeted for EIS are those that have not been placed in special education, but are at risk of otherwise being so placed without such interventions. The major reason for targeting the Director of Federal programs is the probability of a “feudal war” breaking out between the special education program -- which will be “losing” 15 percent of its IDEA funds -- and the receiving office, usually Title I would be minimized. Although decisions over the types of EIS/RTI reporting and monitoring administrative applications, as well as instructional
and behavioral interventions and professional development/support will be a shared responsibility among the three individuals, the Director of Federal programs will likely be the final decision-maker because his or her office will be responsible for ensuring compliance with Federal Title I and IDEA regulations and Non-Regulatory Guidance, which are different and somewhat complex. Sales staff should be aware that district special education officials are likely to be the most knowledgeable about EIS and RTI and consider the approach as response to “intervention.” On the other hand, the Title I office staff will perceive RTI as being a type of “differentiated instruction” and could refer to it as response to “instruction.” In discussions with all parties, the proposed solution should be described clearly as supplemental instructional materials or software and/or interventions, but in no way referred to as a basal text or even basal replacement. This is particularly true if such RTI approaches are being adopted in Title I programs using Title I funds for purchases because Title I funds can be used to purchase only supplemental materials or interventions and not basal texts (i.e., Tier 1 of the three-tiered approach generally used by districts and states). For IDEA-funded EIS, some districts may allow curriculum replacements and consider Tier 3-only interventions for students who are already placed in special education programs after the earlier Tier 1 and 2 interventions failed to produce desirable results.

Decisions regarding the interventions and types of professional development and support to be selected (typically up to three families of interventions) will be largely influenced by the district Director of Special Education Programs. The most recent survey on RTI (see May TechMIS Washington Update) found that in more than half of the districts implementing RTI, the lead role in convincing the district to do so was the Director of Special Education, although overall implementation is a “unified” or “shared” responsibility.

III. Principals in Schools Which Are in Similarly-Situated Stages of Sanctions

Principals of schools in different stages of improvement (i.e., being identified for improvement for the first time to being in corrective action or restructuring) will have different concerns which should be taken into account when approaching them and positioning products and/or services. Generally speaking, the amount of additional funding through set-asides of new USED School Improvement Grants or state grants will generally increase as the school enters the most severe sanctions and, therefore, requires the most serious interventions. Under a new pilot program recently announced by the Secretary of Education, up to ten states will come up with their own differentiated interventions which schools in corrective action and restructuring will have to implement in order to receive additional funding.

Schools identified for improvement for two years will have to provide SES, either themselves or, more likely, through third-party SES providers and must earmark ten percent of their Title I funds for staff development. Principals should be reminded that if their school has a 21st Century Community Learning Center-funded after-school program that is operated, in whole or part, by the district that the after-school programs might be
able to provide SES and could minimize the amount of Title I funds flowing outside the
district to third-party vendors. USED Non-Regulatory Guidance has also provided much
flexibility in how the ten percent professional development set-aside for a Title I school
can be used and does not need to focus only on Title I teachers.

Principals of schools in corrective action are generally involved in developing
restructuring plans, usually in coordination with district staff and, in some cases, SEA
School Improvement Support Teams. Recently, intermediate education units and other
regional entities are becoming more involved in providing professional development and
services to these schools. Such principals should be reminded that, if the curriculum is to
be totally or partially replaced, Title I funds can be used only to pay for supplemental
interventions and not the core basal program, which would have to be purchased using
other funds. Principals of schools in corrective action and/or restructuring also need to be
reminded that, in order for them to receive increased Title I funding under School
Improvement Grants (up from $125 million to $490 million next year) and the four
percent SEA set-aside for school improvement (estimated to be $500 million), the school
must have in place, according to Federal eligibility guidelines, a system for continuous
data gathering and monitoring of individual student performance which is used to provide
feedback to teachers to inform instruction.

Within the districts that receive increases even after adjustments by the SEA, principals
in some schools may be receiving additional Title I funding which could be used to
increase the number of students served (e.g., becoming a schoolwide program). This is
likely to occur if the district Title I office feels that the increase is a one-time windfall
and, hence, it decides not to expand Title I services to new schools, but rather to expand
the number of students served in existing Title I schools. This would avoid the “political
sensitivity” of having to take Title I funds away from “newer” Title I schools in
subsequent years.

On the other hand, if district officials believe that Title I funding increases will occur in
subsequent years, based largely on an influx of Title I eligible students, then it will
expand the number of schools receiving Title I services. Principals in these schools will
likely purchase products of an investment type and staff development more so than on
hiring new teachers or aides during that first year.

Call Charles if you have any questions (703) 536-2310.