



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING

GRETCHEN WHITMER  
GOVERNOR

MICHAEL F. RICE, Ph.D.  
STATE SUPERINTENDENT

**MEMORANDUM**

**DATE:** January 16, 2020

**TO:** Local and Intermediate School District Superintendents  
Public School Academy Directors

**FROM:** Venessa A. Keesler, Ph.D., Deputy Superintendent *V. Keesler*  
Division of Educator, Student, and School Supports

**SUBJECT:** Requesting Public Comment for Special Waiver of the Title I, Part A  
15 Percent Carryover for Fennville Public Schools

On behalf of Fennville Public Schools, the Michigan Department of Education (MDE), is requesting permission from the United States Department of Education (USED) to waive the limitation for MDE to grant a Title I, Part A 15 percent carryover waiver to Fennville Public Schools more than once every three years. MDE is providing an opportunity for public comment as required for this waiver.

Fennville Public Schools had an audit of its 2017-18 fiscal year federal program funds at the end of October 2018. Recaptured funds were to be returned to the district as carryover into 2018-19 at the conclusion of the audit. The amount of unspent and recaptured funds from the 2017-18 grant year exceeded the 15 percent limit for carryover into 2018-19. The final amended audit letter was not received until August 2019, after the spending period of the 2018-19 grant year. The district filed, and was approved for, a carryover waiver for 2018-19 into 2019-20, with the anticipation of receipt of the recaptured 2017-18 funds in the 2019-20 fiscal year. For the funds to be released as carryover to the district, a waiver for 2017-18 funds into 2018-19 is also required from USED.

MDE is opening this waiver request for public comment, on behalf of the Fennville Public Schools. Those wanting to comment on this request can email comments to [TitleICarryoverWaiver@michigan.gov](mailto:TitleICarryoverWaiver@michigan.gov). This mailbox will be available until January 31, 2020. All comments will be given consideration by MDE and attached to the request sent to USED.

cc: Michigan Education Alliance

Attachment

Michigan Department of Education  
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608 WEST ALLEGAN STREET • P.O. BOX 30008 • LANSING, MICHIGAN 48909  
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## Office of Educational Supports

### Title I, Part A 15% Carryover Waiver for 2017-18 Funds

Supporting documentation for the Title I, Part A Waiver Request for Fennville Public Schools, Fennville, Michigan

The Fennville Public School District (Fennville) is requesting a waiver of certain statutory and regulatory requirements of Title I, Part A of the Elementary and Secondary Act of 1965 (ESEA). In accordance with ESEA Section 8401(b), the plan for Title I Part A support is included below.

- (A) Federal program affected: Title I, Part A 2017-18 (FY2017)
- (B) Federal statutory requirement to be waived: Section 1127(b)
- (C) Effect of waiver on student academic achievement:

Title I, Part A funding benefits Fennville students and contributes to their overall academic achievement. Fennville is located in a rural community in Southwest Michigan. Fennville has one elementary building (K-5), one middle school (6-8), one high school (9-12) and one alternative high school (9-12). The Title I, Part A funding supports the elementary school of approximately 565 students (77% low-income), the middle school of approximately 310 students (72% low-income), and the alternative high school of approximately 14 students (86% low-income). Both the elementary and middle schools are supported schoolwide.

The Title I, Part A funding is a critical part of the academic achievement of Fennville's most vulnerable students. Based on the results of early Kindergarten assessments, approximately one-third of our students entering kindergarten do not know their letter sounds and/or numbers. Their background knowledge and basic vocabulary skills are low compared to their peers who are not low-income. Our Title I, Part A funding assists in providing a multi-tiered system of support using evidence-based interventions in small groups of 3-8 students. This allows for more individual opportunities to respond and practice with language and the essential foundational reading or math skills. Title I, Part A funds are used for evidence-based materials, highly qualified teachers and instructional paraprofessionals to provide this instruction.

Without the Title I, Part A funds to provide the above multi-tiered system of support, Fennville will not be able to ensure the rich level of instruction and precise teaching for the most vulnerable students. Although students would continue to receive high quality instruction in their general education classrooms, educators could not be as efficient in ensuring that all students are learning at high levels.

- (D) Methods Fennville Public Schools will use to monitor and evaluate effectiveness:  
Fennville's multi-tiered system of support funded by Title I, Part A is carefully monitored and evaluated using student assessment data, classroom observation, and teacher expertise. All teachers meet three times a year as a grade level to examine building, grade- level, classroom and individual student data. At these meetings, Tier 1 instruction is analyzed to ensure that the instruction is meeting the needs of most of the students. For those students needing additional support, small groups are formed for the intervention block based on student need as evidenced in the data. Once a month, teachers meet again in grade-level teams to look at the progress monitoring data of the individual Tier 2 and Tier 3 students, as well as the progress of the student groups. Adjustments in instruction, pacing or student groupings are made as necessary. The Title I, Part A funding assists Fennville students with the evidence-based materials and supplies to run the above system. In addition, Fennville provides a twice weekly after-school tutoring program with transportation and a series of parent outreach activities. As of today, this system provides high quality small group instruction to approximately 244 students daily, five days a week. A few of the students with the most needs receive this small group opportunity twice each school day. At least annually, District staff evaluates the effectiveness of the Title I, Part A supports by analyzing the summative assessment data provided through State assessments.
- (E) This provided information is directly related to the waiver request.
- (F) Continuation of assistance to students served by Title I, Part A funds:  
Because the multi-tiered system of supports at Fennville Public Schools has shown positive results for the students served, the District will continue to provide the above level of support which is critical for the neediest students to reach the academic standards defined for their grade levels. Fennville Public Schools will continue to work with our parents and the community to keep them apprised of student achievement. We will continue to meet with parents, provide mentoring opportunities and creative ways to connect with our community, and be as transparent as possible in the work we are doing, supported by Title I, Part A funds, to further student achievement.

REQUIRED WAIVER INFORMATION:

Please describe the reasons the Local Educational Agency (LEA) was unable to obligate and expend at least 85% of the 2017-18 Title I, Part A allocation.

Fennville Public Schools had an audit of the 2017-18 fiscal year federal program funds at the end of October 2018. Recaptured funds were to be returned to the District at the conclusion of the audit. The amount of unspent and recaptured funds from the 2017-18 grant year exceeded the 15% limit for carryover into 2018-19, but the final amended audit letter was not received until August 2019, after the spending period of the 2018-19 grant year. The District filed and was approved for a carryover waiver for 2018-19 into 2019-20 anticipating receipt of the recaptured 2017-18 funds in the 2019-20 fiscal year. In order for the funds to be returned to the District, a

waiver for 2017-18 funds into 2018-19 is also required with an appeal to the U.S. Department of Education to have waivers in two successive years.

After detailed description, complete the following assurance statement:

Jim Greydanus of Fennville Public Schools submitted the following Certification of Title I, Part A 15% Carryover Waiver for 2017-18 Funds on December 12, 2019:

Our LEA acknowledges that when granted this waiver, we agree to abide by the following set of assurances:

- Our LEA will comply with the statutory and regulatory obligations associated with this waiver in respect to our **2017-18 Title I, Part A allocation** (ESEA Section 1127).
- Our LEA will comply with all reporting requirements associated with this waiver as set forth by the United States Department of Education and the Michigan Department of Education (ESEA Section 8401).

By sending this e-mail, I understand that our agency is requesting a Title I, Part A Carryover Waiver. This request will be reviewed based on Federal requirements. The LEA will receive an e-mail confirming approval or denial by the Office of Field Services.

PLEASE SAVE THIS COMPLETED REQUEST AND ATTACH TO THE E-MAIL TO: [TitleICarryoverWaiver@michigan.gov](mailto:TitleICarryoverWaiver@michigan.gov). Please maintain a copy of the submitted assurance and the e-mail from your "Sent Items" for your records.