

Guide to Answering Program Implementation Questions In the 2018-2019 ESSA Consolidated Compliance Reports

The ESSA Consolidated Compliance Reports included in this document are as follows:

- PR3099 – Private Nonprofit (PNP) School Equitable Services Compliance Report
- PR1000 – Title I, Part A
- PR1200 – Title I, Part C – Ed of Migratory Children
- PR2000 – Title I, Part D, Subparts 1 and 2
- PR3000 – Title II, Part A
- PR3002 – Title III, Part A
- PR3107 – Title IV, Part A
- PR6200 – Title VIII, Sec 8532 School Choice Option

Private Nonprofit (PNP) School Equitable Services

Program Implementation Question	Compliance Status Response
Program Coordination/Integration	
<p>1. Did the LEA conduct timely and meaningful consultation with participating PNP school officials regarding the implementation of the program(s)?</p> <p>The consultation must have occurred before the LEA made any decision that affected the opportunities of eligible PNP school children, teachers, and other educational personnel to participate in the program, and continued throughout the implementation and assessment of program activities.</p> <p>[Section 1117(b)(1) and Section 8501(c)(1)]</p>	<p>For each applicable participating program, if compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Agendas, meeting minutes, sign-in attendance sheets • Emails and phone logs documenting ongoing consultation <p>For each applicable participating program, if compliance status is No, LEA must explain the reason for noncompliance.</p>
<p>2. Did the LEA maintain local control of applicable program funds being used to provide equitable services to private school students and their teachers?</p> <p>[Section 1117(d) and Section 8501(d)]</p>	<p>For each applicable participating program, if compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • District policies and procedures documenting internal control practices • Inventory control and property management records • Written procedures and documentation that would verify and track LEA PNP inventory purchases <p>For each applicable participating program, if compliance status is No, LEA must explain the reason for noncompliance.</p>

Guide to Program Implementation Questions—Private Nonprofit Schools (PNP)

Program Implementation Question	Compliance Status Response
<p>3. Documentation of equitable services amount used, and detailed explanation is available for all applicable participating programs.</p> <p>For Title I, Part A = Amount listed on 2018-2019 ESSA Consolidated Application, PS3101 Part 1b.</p>	<p>For each applicable participating program, if compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Documentation LEA informed PNP officials of fiscal requirements for participating programs (i.e., agenda, meeting minutes, LEA program summaries, timeline of professional development travel and PNP purchase requests, calendar of program services with equitable services amounts, etc.) • Documentation LEA shared calculated equitable services by program and PNP campus for all participating programs (i.e., LEA calculations by PNP campus and program level, calculation formulas per PNP campus, etc.) • Written procedures and documentation that would verify and track LEA PNP inventory purchases <p>For each applicable participating program, if compliance status is No, LEA must explain the reason for noncompliance.</p>
<p>4. Documentation of equitable services administration amount used, and detailed explanation is available for all applicable participating programs.</p> <p>For Title I, Part A = Portioned equitable services amount listed on 2018-2019 ESSA Consolidated Application specifically for PNP schools in PS3101 Part 1d.</p>	<p>For each applicable participating program, if compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Detailed budget ledgers • Documentation LEA informed PNP officials during consultation(s) of equitable services administration amount and how it will be used (i.e., agenda, meeting minutes, calculated campus spreadsheets, etc.) <p>For each applicable participating program, if compliance status is No, LEA must explain the reason for noncompliance.</p>

Title I, Part A

Program Implementation Question	Compliance Status Response
Program Coordination/Integration	
<p>1. The LEA plan is developed in coordination and integration with other Federal, State, and local services, resources, and programs, such as programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start programs, adult education programs, career and technical education programs, and schools implementing comprehensive support and improvement activities or targeted support and improvement activities under section 1111(d).</p> <p>[Section 1114 (b)(5)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
<p>2. The LEA coordinates and integrates services provided under this part with other educational services at the local educational agency or individual school level, such as services for English learners, children with disabilities, migratory children, American Indian, Alaska Native, and Native Hawaiian children, and homeless children and youths, in order to increase program effectiveness, eliminate duplication, and reduce fragmentation of the instructional program.</p> <p>[Section 1112 (c)(4)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
Needs Assessment	
<p>3. The Title I, Part A, schoolwide program is based on a comprehensive needs assessment of the entire school that takes into account information on the academic achievement of children in relation to the challenging State academic standards, particularly the needs of those children who are failing, or are at-risk of failing, to meet the challenging State academic standards and any other factors as determined by the local educational agency.</p> <p>[Section 1114 (b)(6)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>The only reason this question would be marked "NA" would be that the LEA only operates Targeted Assistance programs under Title I, Part A.</p> <p>In this case, check the box in Part 5.3.B that states "The LEA only operates Targeted Assistance programs."</p>
<p>4. For a Title I, Part A targeted assistance program, the LEA identifies children not older than age 21 who are entitled to a free public education through grade 12; and children who are not yet at a grade level at which the local educational agency provides a free public education.</p> <p>[Section 1115 (c)(1)(A)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>The only reason this question would be marked "NA" would be that the LEA only operates Schoolwide programs under Title I, Part A.</p> <p>In this case, check the box in Part 5.4.B that states "The LEA only operates Schoolwide programs."</p>

Program Implementation Question	Compliance Status Response
Parental Involvement	
<p>5. The LEA has a written parent and family engagement policy that is incorporated into the local educational agency's plan developed under section 1112, establish the agency's expectations and objectives for meaningful parent and family involvement.</p> <p>[Section 1116 (a)(2)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
<p>6. Each school served shall jointly develop with, and distribute to, parents and family members of participating children a written parent and family engagement policy, agreed on by such parents. Parents shall be notified of the policy in an understandable and uniform format and, to the extent practicable, provided in a language the parents can understand. Such policy shall be made available to the local community and updated periodically to meet the changing needs of parent and the school.</p> <p>[Section 1116 (b)(1)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
<p>7. Each Title I, Part A campus convenes an annual meeting, at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation under this part and to explain the requirements of this part, and the right of the parents to be involved.</p> <p>[Section 1116(D)(c)(1)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
<p>8. The LEA has School-Parent compacts at each Title I, Part A campus that 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.</p> <p>[Section 1116 (d)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
<p>9. The LEA shall educate teachers, specialized instructional support personnel, principals, and other school leaders, and other staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school.</p> <p>[Section 1116 (e)(3)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>

Program Implementation Question	Compliance Status Response
<p>10. The Title I, Part A Schoolwide plan is available to the LEA, parents, and the public, and the information contained in such plan shall be in an understandable and uniform format and, to the extent practicable, provided in a language that the parents can understand.</p> <p>[Section 1114 (b)(4)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
<p>11. Each Title I, Part A campus provides to parents information that shows how the school's student's achievement on the State's academic assessments compared to students served by the local educational agency and the State.</p> <p>[Section 1111 (h)(2)(C)(ii)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
<p>12. At the beginning of each school year, a local educational agency shall notify the parents of each student that the parents may request, and the agency will provide the parents on request (and in a timely manner), information regarding the professional qualifications of the student's classroom teacher(s).</p> <p>[Section 1112 (e)(1)(A)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p> <p>This is an LEA responsibility, although it may be that the LEA requires each Title I, Part A campus to notify the parents concerning their right to request information.</p>
Program Evaluation	
<p>13. The LEA has a written parent involvement policy and conducts, with the meaningful involvement of parents and family members, an annual evaluation of the content and effectiveness of the parent and family engagement policy in improving the academic quality of all Title I, Part A schools served.</p> <p>[Section 1116 (a)(2)(D)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
Supplement, Not Supplant	
<p>14. The LEA has either a formal Supplement, Not Supplant Methodology for distributing State and local funds in order to ensure that each Title I campus receives all of the State and local funds that it would receive in the absence of Title I funds; or, it has a formal Statement of Exemption.</p> <p>[Section 1118 (b)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>

Title I, Part C

Program Implementation Question	Compliance Status Response
Program Coordination/Integration	
<p>1. Did the LEA make adequate provisions for serving the unmet educational needs of preschool migrant children?</p> <p>[Section 1304(b)(1) and (c)(4)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Enrollment report from NGS (e.g., district or campus report) showing number of preschool-aged migrant children • Documentation showing number of preschool migrant children served by early childhood program (district-based program, home-based program, Teaching and Mentoring Communities (TMC), Head Start, etc.) • Documentation of efforts to provide services to preschool-aged migrant children not being served through other sources <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>The only reason an LEA could justify a compliance status of “NA” in response to this question would be that the LEA had no preschool-aged migrant children identified in the New Generation System (NGS).</p> <p>In this case, the LEA should write the following: “<i>The LEA had <u>no</u> preschool-aged migrant children identified in the New Generation System (NGS).</i>”</p>
Needs Assessment	
<p>2. Did the LEA give service priority to migrant children who were failing or most at risk of failing to meet the State's content and performance standards and whose education had been interrupted during the regular school year?</p> <p>[Sections 1301(2), 1304(d)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Priority for Service (PFS) Report <u>and</u> an Individual Supplemental Programs Report from NGS which lists supplemental services being provided to the PFS students (Note: If the Supplemental Programs Report is submitted, the district must highlight the names of the PFS students);

Program Implementation Question	Compliance Status Response
	<ul style="list-style-type: none"> • District PFS student progress records • District PFS Student Action Plans • Individual Student Progress Review • District PFS Reporting Forms • Documentation that MEP-funded services are provided to the PFS students first <p>If the PFS students are already being served appropriately by other programs, such as Title I, Part A, the migrant service requirement may be met by providing migrant services coordination. In this case, the LEA should answer "Yes" and be prepared to provide appropriate documentation.</p> <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>The only reason that an LEA could justify a compliance status of "NA" in response to this question would be that the district had no PFS children identified in NGS during the school year.</p> <p>In this case, the LEA should write the following: <i>"The LEA had <u>no</u> PFS children identified in NGS during the school year."</i></p>
<p>3. Did the LEA identify and address the educational needs of migrant children through a needs assessment and outline a comprehensive plan for the delivery of services?</p> <p>[Section 1306(a)(1)(A) - (G)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of "Yes" include:</p> <ul style="list-style-type: none"> • A completed version of the Texas MEP local needs assessment (LNA) tool • A copy of the LEA's Comprehensive Needs Assessment (CNA), if it includes a migrant-specific component • A copy of the District Improvement Plan showing the migrant-specific section • Documentation showing how the LEA is conducting the activities approved on the PS3103 of the Consolidated Application for Funding <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>

Program Implementation Question	Compliance Status Response
Parental Involvement	
<p>4. Did the LEA establish a parent advisory council (PAC) for the migrant program and provide opportunity for appropriate consultation in the planning, implementation, and evaluation of the LEA's migrant program?</p> <p>[Sections 1304(c)(3); 1306(a)(1)(B)(ii); and 1118]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of "Yes" include:</p> <ul style="list-style-type: none"> • Agendas for migrant parent advisory council meetings • Meeting notes for migrant parent advisory council meetings • Minutes for migrant parent advisory council meetings • Sign-in sheets for migrant parent advisory council meetings • Documentation that meetings were offered at times that migrant parents could attend, and that the meetings were conducted in a language that the parents could understand, or that translation was provided as needed • Documentation that the meetings allowed for meaningful consultation with and input from migrant parents concerning the planning, implementation and evaluation of the program <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>One reason that an LEA receiving these funds could justify a compliance status of "NA" in response to this question is if it had documentation to show that efforts were made to establish a PAC, but due to factors such as extreme geographical distance, low numbers of identified migrant families within the LEA, etc., a PAC was not established.</p>
Program Evaluation/Instructional Services	
<p>5. Did the LEA evaluate and improve the effectiveness of the migrant program to enable all migrant students to meet the same challenging State content and performance standards that all Texas children are expected to meet?</p> <p>[Section 1304(b)(1), (b)(2) and (c)(5)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of "Yes" include:</p> <ul style="list-style-type: none"> • A copy of the migrant program evaluation conducted for activities approved on the PS3103 <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>

Program Implementation Question	Compliance Status Response
<p>6. Did the LEA evaluate all support services provided by the Migrant Education Program?</p> <p>[Section 1304(b)(1), (b)(2), and (c)(5)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Student surveys • Parent surveys • Student progress reports • A copy of the migrant program evaluation conducted for activities approved on the PS3103 <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of “NA” in response to this question.</p>
<p>7. Did the LEA use support services evaluation results (as described in question #6) to improve services to its migrant students?</p> <p>[Section 1304(b)(1), (b)(2), and (c)(5)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • A copy of the revised District Improvement Plan showing the migrant-specific section with additional services offered to the migrant students • List of improved services offered to the migrant students • Any other document showing how the results were used to improve services to migrant students • Evaluation Planning Meeting Notes <p>If compliance status is No, LEA must explain the reason for noncompliance.</p>
<p>8. Did the LEA identify and recruit migrant children and youth according to the specific timelines and guidance outlined in the Texas Manual for the Identification and Recruitment of Migrant Children in order to ensure the accuracy of such information?</p> <p>[Section 1309(2)-(5)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Recruiter Logs • Reviewer Logs • Sample Record of COE Errors form

Program Implementation Question	Compliance Status Response
	<p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of “NA” in response to this question.</p>
<p>9. Did the LEA ensure interstate and intrastate coordination of services for migrant children to provide educational continuity through timely transfer of pertinent school records?</p> <p>[Section 1304(b)(3)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Emails • Call logs • MSIX Move Notification • Transfer of Student Records Request Log <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>The only case in which an LEA could justify a response of “NA” to this question would be if the LEA served no migrant students during the 2018-2019 school year and had no request for records from another LEA or had no need for this type of coordination.</p>
Use of Funds	
<p>10. Did the LEA consolidate Title I, Part C funds in a schoolwide program?</p> <p>[Section 1304(c)(1)]</p>	<p>If “Yes” is selected, the LEA must submit a copy of the written approval from TEA, and in the response box, the LEA must provide a description of how the funds were only used to carry out activities authorized under the MEP.</p> <p>The only way that an LEA could justify a compliance status of “NA” in response to this question would be if the LEA did not consolidate <u>all</u> of its MEP funds in Title I, Part A schoolwide campus budgets.</p> <p>In this case, the LEA should write the following: “The LEA did not consolidate Title I, Part C funds in a schoolwide program.”</p> <p>To be eligible to consolidate MEP funds in this manner, the LEA would have had to obtain special permission from TEA. For the 2018-2019 school year, <u>no LEAs obtained this permission.</u></p>

Program Implementation Question	Compliance Status Response
<p>11. Did the LEA ensure that all MEP-funded services and activities were supplemental?</p> <p>[Section 1304(c)(2)]</p>	<p>Examples of documentation the LEA might be able to <u>list</u> to support a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • District and campus improvement plans showing the migrant-specific section • Job descriptions for MEP-funded personnel • Copies of emails or phone logs showing efforts to ensure supplemental nature <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of “NA” in response to this question.</p>
<p>12. Were all MEP-funded supplies, materials, and equipment used only for MEP activities and to the benefit of MEP students?</p> <p>[Section 1304(c)(1)]</p>	<p>Examples of documentation the LEA might be able to <u>list</u> to support a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • District and campus improvement plans showing the migrant-specific section • Purchase requisitions • Inventories • Logs on use of equipment • List of participants <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>The LEA could justify a response of “NA” if MEP funds were used <u>only</u> for personnel performing MEP-related duties, and the LEA had <u>no</u> MEP-funded supplies, materials or equipment.</p> <p>In this case, the LEA should write the following: “MEP funds were used <u>only</u> for personnel performing MEP-related duties and the LEA had <u>no</u> MEP-funded supplies, materials or equipment.”</p>
<p>13. Did all Title I, Part C staff who were split-funded with other funds maintain appropriate time and effort records?</p> <p>[EDGAR Cost Principles]</p>	<p>To support a “Yes” response, the LEA should have documentation for charges to payroll, as required in the applicable EDGAR Cost Principles, such as a list of split-funded personnel and copies of their time and effort sheets.</p> <p>If compliance status is No, LEA must explain the reason for noncompliance.</p>

Program Implementation Question	Compliance Status Response
	<p>The LEA could justify a response of “NA” only if the LEA had <u>no</u> Title I, Part C staff who were split-funded with other funds.</p> <p>In this case, the LEA should write the following: <i>“The LEA had no Title I, Part C staff who were split-funded with other funds.”</i></p>
<p>14. Did the LEA have local policies and procedures in place to ensure that migrant student records were requested and transferred in a timely manner?</p> <p>[Section 1304(b)(3)]</p>	<p>Examples of documentation the LEA might be able to <u>list</u> to support a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Local written district procedures for sharing and/or obtaining migrant student records with/from other districts and states; • Transfer of Student Records Request Log; • Records Request Form; • Copies of e-mails and faxes concerning the sharing of student records, etc. <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>The only case in which an LEA could justify a response of “NA” to this question would be if the LEA served no migrant students during the 2018-2019 school year and had no request for records from another LEA. This would be a VERY rare response for an LEA that receives MEP funds.</p>

Title I, Part D

Questions 1-2 and Questions 9-11 are for LEAs that receive Title I, Part D, Subpart 2 funds.

Program Implementation Question	Compliance Status Response
Program Coordination/Integration – Subpart 2	
<p>1. Did the LEA have a formal, written agreement with each local facility it served under Title I, Part D, Subpart 2 and did the agreement address the program that was provided by the LEA, as well as the responsibilities of the facility as described in §1425?</p> <p>[Section 1425]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of “Yes”.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of “NA” in response to this question.</p>
<p>2. Title I, Part D, Subpart 2 data are collected, disaggregated, and evaluated to show the program's impact on the ability of participants to:</p> <ul style="list-style-type: none"> • maintain and improve educational achievement; • accrue school credits that meet State requirements for grade promotion and secondary school graduation; • make the transition to a regular program or other educational program operated by a district; • complete secondary school (or secondary school equivalency requirements) and obtain employment after leaving the facility; and, • as appropriate, to participate in postsecondary education and job training programs. <p>[Section 1431(a)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of “Yes”.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of “NA” in response to this question.</p>

Note that Questions 3-8 of this section are only applicable to State Agencies that receive funding under Title I, Part D, Subpart 1. In Texas, these Agencies are the Texas Juvenile Justice Department and the Windham School District. LEAs will not see these questions on their PR2000 form.

Program Implementation Question	Compliance Status Response
Use of Funds – Subpart 1	
<p>3. Was the State Agency's use of Title I, Part D, Subpart 1 funds supplemental to the regular education program?</p> <p>According to statute, a Title I, Part D, Subpart 1 program that supplements the number of hours of instruction students receive from State and local sources shall be considered to comply with the supplement, not supplant requirement of section 1118 without regard to the subject areas in which instruction is given during those hours.</p> <p>[Section 1415(b)]</p>	<p>On the compliance report, select the type of auditable documentation that the State Agency has readily available upon request to support a compliance status of “Yes”.</p> <p>It is highly unlikely that a State Agency receiving these funds could justify a compliance status of “NA” in response to this question.</p>

Guide to Program Implementation Questions—Title I, Part D

Program Implementation Question	Compliance Status Response
<p>4. In making Title I, Part D, Subpart 1 services available to children and youth in adult correctional institutions, did the State Agency give priority to children and youth who are likely to complete incarceration within a 2-year period?</p> <p>[Section 1414(c)(2)]</p>	<p>On the compliance report, select the type of auditable documentation that the State Agency has readily available upon request to support a compliance status of “Yes”.</p> <p>The only instance in which the State Agency could justify a response of “NA” would be if the State Agency operated <u>no</u> adult correctional institutions.</p> <p>In this case, check the box in Part 7.4.B that states “The State Agency does not operate any adult correctional institutions.”</p>
<p>5. Did the State Agency maintain appropriate time and effort records for staff who were paid in whole or in part with Title I, Part D, Subpart 1 funds?</p> <p>[EDGAR Cost Principles]</p>	<p>On the compliance report, select the type of auditable documentation that the State Agency has readily available upon request to support a compliance status of “Yes”.</p> <p>The State Agency could justify a response of “NA” only if it had <u>no</u> staff paid with Title I, Part D, Subpart 1 funds.</p> <p>In this case, check the box in Part 7.5.B that states “The State Agency has not staff paid out of Title I, Part D, Subpart 1.”</p>
<p>6. Does the State Agency have, for each campus that operates an Institution-wide Program under §1416, a comprehensive plan that meets the requirements of §1416?</p> <p>[Section 1416]</p>	<p>On the compliance report, select the type of auditable documentation that the State Agency has readily available upon request to support a compliance status of “Yes”.</p> <p>The State Agency could justify a response of “NA” to this question only if the State Agency had <u>no</u> campus that operated an Institution-wide Program under Title I, Part D, Subpart 1.</p> <p>In this case, check the box in Part 7.6.B that states “The State Agency has no campus that operates an institution-wide program for Title I, Part D, Subpart 1.”</p>
<p>7. Did the State Agency reserve not less than 15% and not more than 30% of its Title I, Part D, Subpart 1 entitlement for Transition Services, as described in §1418?</p> <p>[Section 1418]</p>	<p>On the compliance report, select the type of documentation that the State Agency has readily available upon request to support a compliance status of “Yes”.</p> <p>It is highly unlikely that a State Agency receiving these funds could justify a compliance status of “NA” in response to this question.</p>
<p>8. Did the State Agency evaluate the effectiveness of its Title I, Part D, Subpart 1 program at least once every three years and use the evaluation results, as well as longitudinal studies to make improvements to the subsequent program?</p> <p>[Section 1431]</p>	<p>On the compliance report, select the type of auditable documentation that the State Agency has readily available upon request to support a compliance status of “Yes”.</p> <p>It is highly unlikely that a State Agency receiving these funds could justify a compliance status of “NA” in response to this question.</p>

Guide to Program Implementation Questions—Title I, Part D

Questions 1-2 and Questions 9-11 are for LEAs that receive Title I, Part D, Subpart 2 funds.

Program Implementation Question	Compliance Status Response
Use of Funds – Subpart 2	
<p>9. Did the LEA use Title I, Part D, Subpart 2 funds only for authorized purposes: To support the operation of local educational agency programs that involve collaboration with locally operated correctional facilities—</p> <ol style="list-style-type: none"> 1. to carry out high-quality education programs to prepare children and youth for secondary school completion, training, employment, or further education; 2. to provide activities to facilitate the transition of such children and youth from the correctional program to further education or employment; and 3. to operate programs in local schools for children and youth returning from correctional facilities, and programs which may serve At-Risk children and youth. <p>[Section 1421]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of “Yes”.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of “NA” in response to this question.</p>
<p>10. Did the LEA maintain appropriate time and effort records for staff who were paid in whole or in part with Title I, Part D, Subpart 2 funds?</p> <p>[EDGAR Cost Principles]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of “Yes”.</p> <p>The LEA could justify a response of “NA” only if it had <u>no</u> staff paid with Title I, Part D, Subpart 2 funds.</p> <p>In this case, check the box in Part 7.10.B that states “The LEA has no staff paid out of Title I, Part D, Subpart 2.”</p>
<p>11. Did the LEA operate a program of support for students returning from a facility for the delinquent to a school operated by the LEA?</p> <p>[Section 1422(b)]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of “Yes”.</p> <p>The only instance in which the LEA could justify an “NA” response would be if more than 30% of students attending the school operated at the facility will reside outside the area served by the LEA when they leave the facility.</p> <p>In this case, check the box in Part 7.11.B that states “The LEA had more than 30% of students attending the school operated at the facility resided outside the area served by the LEA when they left the facility.”</p>

Title II, Part A

Program Implementation Question	Compliance Status Response
Program Coordination/Integration	
<p>1. The LEA meaningfully consulted with teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders (in an LEA that has charter schools) parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of Title II, Part A.</p> <p>[Section 2102(b)(3)(A)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of "Yes" include:</p> <ul style="list-style-type: none"> • Meeting agendas and minutes • Meeting sign-in sheets • Materials used during consultation events • Surveys and their results <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
<p>2. The LEA sought advice from the individuals and organizations described in the preceding subparagraph regarding how best to improve the LEA's activities to meet the purpose of Title II, Part A.</p> <p>[Section 2102(b)(3)(B)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of "Yes" include:</p> <ul style="list-style-type: none"> • Meeting agendas and minutes • Meeting sign-in sheets • Materials used during consultation events • Surveys and their results <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
<p>3. The LEA coordinated activities under Title II, Part A with other related strategies, programs, and activities being conducted in the community.</p> <p>[Section 2102(b)(3)(C)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of "Yes" include:</p>

Program Implementation Question	Compliance Status Response
	<ul style="list-style-type: none"> • Official promotional material showing coordination between the LEA and community partners for applicable activities • Documentation showing use of funds in coordination with applicable community activities <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>An LEA receiving these funds could justify a compliance status of “NA” in response to this question if the Title II, Part A activities pursued by the LEA do not exist within the community, making coordination impossible.</p>
<p>4. The LEA prioritized funds to schools served by the agency under Title I, Section 1111(d) and that have the highest percentage of children counted under Title I, Section 1124(c).</p> <p>[Section 2102(b)(2)(C)]</p>	<p>If compliance status is Yes, the LEA should indicate the documentation available that shows Title II, Part A activities and their costs for each campus within the LEA, demonstrating prioritization to schools served by the agency under Title I, Section 1111(d) and that have the highest percentage of children counted under Title I, Section 1124(c).</p> <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of “NA” in response to this question.</p>
<p>5. The LEA coordinated Title II, Part A, professional development activities with professional development activities provided through other federal, state, and local programs.</p> <p>[Section 2102(b)(2)(F)]</p>	<p>If compliance status is Yes, the LEA should indicate the documentation available that shows professional development activities funded by Title II, Part A and which other sources of funds (other federal, state, and local programs) were used to support those same professional development activities.</p> <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of “NA” in response to this question.</p>
<p>6. The LEA used data and ongoing consultation to continually update and improve Title II, Part A activities.</p> <p>[Section 2102(b)(2)(D)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Meeting agendas and minutes • Meeting sign-in sheets • Materials used during consultation events

Program Implementation Question	Compliance Status Response
	<ul style="list-style-type: none"> • Surveys and their results • Data collection instruments and their results <p>If compliance status is No, LEA must explain the reason for noncompliance.</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of “NA” in response to this question.</p>

Title III, Part A

Program Implementation Question	Compliance Status Response
Needs Assessment	
<p>1. Did the LEA/Fiscal Agent determine that all teachers in Title III language instructional programs for English learners are fluent in both English and any other language used for instruction, including having written and oral communication skills?</p> <p>[Section 3116(c)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Documentation that an LEA/Fiscal Agent might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> Documentation showing that teachers who are providing bilingual instruction are fluent in English and the other language used for instruction. [See Title III Teacher Fluency section of Application Instructions for 2018-2019 for examples of methods for ensuring fluency.] <p>The only reasons why an LEA/Fiscal Agent should mark “N/A” for this question are if the LEA/Fiscal Agent was not required to provide a bilingual program (as per statewide requirements for bilingual instruction) <u>or</u> if it was required to provide one but had a TEA Bilingual Exception in effect for the 2018-2019 school year.</p>
Engagement Activities	
<p>2. Did the LEA/Fiscal Agent implement effective parent engagement activities for parents of English learners/immigrant students that went above and beyond other federal programs?</p> <p>[Section 3115 (c)(3)(A)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available reflecting implementation of effective parent engagement activities conducted for parents of English learners/immigrant students.</p> <p>Documentation that an LEA/Fiscal Agent might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> Presentations (e.g., power point slides, presenter’s notes, or handouts.) Meeting Agenda Sign-in sheet (Reflects that the activity occurred during the 2018-2019 academic year.) Notification of event (e.g., emails to parents, newsletters, or a flyer.) <p>Note: The State understands some examples of documentation listed may not be reasonable due to the size of the LEA/Fiscal Agent’s EL population.</p> <p>It is highly unlikely that an LEA/Fiscal Agent receiving these funds could justify a compliance status of “N/A” in response to this question.</p>
<p>3. Did the LEA/Fiscal Agent implement effective family engagement activities for parents of English learners/immigrant students that went above and beyond other federal programs?</p> <p>[Section 3115 (c)(3)(A)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available reflecting implementation of effective family engagement activities conducted for families of English learners/immigrant students.</p> <p>Documentation that an LEA/Fiscal Agent might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> Family Engagement & Community Engagement Planning Tool:

Program Implementation Question	Compliance Status Response
	<p>Phase 4: Communication of Outcomes</p> <ul style="list-style-type: none"> • Presentations (e.g., power point slides, presenter's notes, or handouts.) • Meeting Agenda • Sign-in sheet (Reflects that the activity occurred during the 2018-2019 academic year.) • Notification of event (e.g., e-mails to parents, newsletters, or a flyer.) <p>Note: The State understands some examples of documentation listed may not be reasonable due to the size of the LEA/Fiscal Agent's EL population.</p> <p>It is highly unlikely that an LEA/Fiscal Agent receiving these funds could justify a compliance status of "N/A" in response to this question.</p>
<p>4. Did the LEA/Fiscal Agent implement effective community engagement activities for parents of English learners/immigrant students that went above and beyond other federal programs?</p> <p>[Section 3115 (c)(3)(A)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available reflecting implementation of effective community engagement activities conducted for parents of English learners/immigrant students.</p> <p>Documentation that an LEA/Fiscal Agent might be able to list in support of a compliance status of "Yes" include:</p> <ul style="list-style-type: none"> • Family Engagement & Community Engagement Planning Tool: Phase 4: Communication of Outcomes • Presentations (e.g., power point slides, presenter's notes, or handouts.) • Meeting Agenda • Sign-in sheet (Reflects that the activity occurred during the 2018-2019 academic year.) • Notification of event (e.g., e-mails to parents, newsletters, or a flyer.) <p>Note: The State understands some examples of documentation listed may not be reasonable due to the size of the LEA/Fiscal Agent's EL population.</p> <p>It is highly unlikely that an LEA/Fiscal Agent receiving these funds could justify a compliance status of "N/A" in response to this question.</p>
Administrative Costs – ELA Program	
<p>5. Did the LEA/Fiscal Agent meet the statutory 2% limitation on administrative costs related to the implementation of the Title III, Part A program?</p> <p>[Section 3115(b)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a "Yes" response, the LEA/Fiscal Agent should have Title III, Part A -ELA budget documents detailing program and administrative costs.</p> <p>The only reason an LEA/Fiscal Agent could just justify a compliance status of "N/A" would be that the LEA/Fiscal Agent <u>did not have</u> any administrative costs related to the implementation of the Title III, Part A – ELA program.</p>

Program Implementation Question	Compliance Status Response
<p>6. When calculating administrative costs for the Title III, Part A program, did the LEA/Fiscal Agent include all appropriate administrative costs, including both indirect costs and direct costs such as administrative salaries?</p> <p>[EDGAR Cost Principles and Section 9201]</p>	<p>The LEA/Fiscal Agent should write the following: “LEA or Fiscal Agent did not use Title III, Part A – ELA funds for administrative costs.”</p> <p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA/Fiscal Agent should have Title III, Part A- ELA budget documents detailing program and administrative costs.</p> <p>The only reason an LEA/Fiscal Agent could just justify a compliance status of “N/A” would be that the LEA/Fiscal Agent did not have administrative costs related to the implementation of the Title III, Part A – ELA program.</p> <p>The LEA/Fiscal Agent should write the following: “LEA or Fiscal Agent did not use Title III, Part A – ELA funds for administrative costs.”</p>
<p>7. Did the LEA/Fiscal Agent require third-party contractor(s) associated with the Title III, Part A program to break out administrative costs, which were included in the 2% limitation?</p> <p>[EDGAR Cost Principles and Section 9201]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA/Fiscal Agent should have copies of any third-party contracts, requiring the break-out of administrative costs; the LEA/Fiscal Agent should also have Title III, Part A – ELA budget documents detailing program and administrative costs, including the administrative costs from any third-party contracts.</p> <p>The only reason an LEA/Fiscal Agent could justify a compliance status of “N/A” would be that the LEA/Fiscal Agent did not have any third-party contracts.</p> <p>The LEA/Fiscal Agent should write the following: “LEA or Fiscal Agent did not have any did not have any third-party contracts associated with the Title III, Part A – ELA program.”</p>
Use of Funds – ELA Program	
<p>8. Did the LEA/Fiscal Agent support the development and implementation of pre-school programs for English learners?</p> <p>[Section 3115(d)(4)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA/Fiscal Agent should have a description in the LEA and/or campus plans that shows how the Title III, Part A – ELA program supports the development and implementation of pre-school programs for English learners. The LEA/Fiscal Agent should also have documentation that the program beneficiaries are English learners.</p> <p>The LEA/Fiscal Agent could justify a response of “N/A” if the LEA/Fiscal Agent did not use any Title III, Part A-ELA funds for the support for the development and implementation of pre-school programs for English learners.</p>

Program Implementation Question	Compliance Status Response
	<p>The LEA/Fiscal Agent should write the following: “LEA or Fiscal Agent did not use any Title III, Part A-ELA funds for the support for the development and implementation of pre-school programs for English learners.”</p>
<p>9. Did the LEA/Fiscal Agent improve instruction of English learners, which may include English learners with a disability?</p> <p>[Section 3115(d)(7)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA/Fiscal Agent should have a description in the LEA and/or campus plans that shows how the Title III, Part A – ELA program improves instruction of English learners, which may include English learners with a disability. The LEA/Fiscal Agent should also have documentation that the program beneficiaries are English learners.</p> <p>The LEA/Fiscal Agent could justify a response of “N/A” if the LEA/Fiscal Agent did not use any Title III, Part A-ELA funds for the improvement of instruction of English learners, which may include English learners with a disability.</p> <p>The LEA/Fiscal Agent should write the following: “LEA or Fiscal Agent did not use any Title III, Part A-ELA funds for the support for the improvement of instruction of English learners, which may include English learners with a disability.”</p>
<p>10. Did the LEA/Fiscal Agent offer early college high school or dual or concurrent enrollment programs or courses designed to help English learners achieve success in post-secondary education?</p> <p>[Section 3115(d)(8)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA/Fiscal Agent should have a description in the LEA and/or campus plans that shows how the Title III, Part A – ELA program offers early college high school or dual or concurrent enrollment programs or courses designed to help English learners achieve success in post-secondary education. The LEA/Fiscal Agent should also have documentation that the program beneficiaries are English learners.</p> <p>The LEA/Fiscal Agent could justify a response of “N/A” if the LEA/Fiscal Agent did not use any Title III, Part A-ELA funds for early college high school or dual or concurrent enrollment programs or courses designed to help English learners achieve success in post-secondary education.</p> <p>The LEA/Fiscal Agent should write the following: “LEA or Fiscal Agent did not use any Title III, Part A-ELA funds for early college high school or dual or concurrent enrollment programs or courses designed to help English learners achieve success in post-secondary education.”</p>
<p>11. Did all Title III, Part A staff who were split-funded with other funds maintain appropriate time and effort records?</p> <p>[EDGAR Cost Principles]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA/Fiscal Agent should have the following:</p>

Program Implementation Question	Compliance Status Response
	<ul style="list-style-type: none"> a list of staff paid with Title III, Part A – ELA funds, including percentage of time spent working in program and sufficient information to indicate the work or duties carried out, as appropriate; Documentation for charges to payroll, as required in the applicable EDGAR cost principle. <p>The LEA/Fiscal Agent could justify a response of “N/A” only if the LEA/Fiscal Agent had <u>no</u> staff who were split-funded with Title III, Part A – ELA funds and other funds.</p> <p>The LEA/Fiscal Agent should write the following: “LEA or Fiscal Agent had no staff who were split-funded with Title III, Part A – ELA and other funds.”</p>
<p>12. Did the LEA/Fiscal Agent maintain control of Title III, Part A program funds being used to provide equitable services to private school EL students and their teachers?</p> <p>[Section 9501(d)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA/Fiscal Agent should have written procedures for approving and processing Title III, Part A – ELA expenditures related to services to private schools, as well as accounting records showing the approved expenditures according to the LEA’s written procedures.</p> <p>The only reason an LEA/Fiscal Agent could justify a compliance status of “N/A” in response to this question would be that the LEA/Fiscal Agent <u>did not have</u> participating private non-profit schools.</p> <p>The LEA/Fiscal Agent should write the following: “LEA or Fiscal Agent did not have any participating profit nonprofit schools in the Title III, Part A – ELA program.”</p>
Administrative Costs – Immigrant Program	
<p>13. When calculating administrative costs for the Title III, Part A- Immigrant program, did the LEA/Fiscal Agent include all appropriate administrative costs, including both indirect costs and direct costs such as administrative salaries?</p> <p>[EDGAR Cost Principles and Section 9201]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA/Fiscal Agent should have Title III, Part A – Immigrant budget documents detailing program and administrative costs.</p> <p>The only reason an LEA could just justify a compliance status of “N/A” would be that the LEA/Fiscal Agent <u>did not have</u> administrative costs related to the implementation of the Title III, Part A – Immigrant program.</p> <p>The LEA should write the following: “LEA or Fiscal Agent did not use Title III, Part A – Immigrant funds for administrative costs.”</p>
Use of Funds – Immigrant Program	
<p>14. Did all Title III, Part A-Immigrant staff who were split-funded with other funds maintain appropriate</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p>

Program Implementation Question	Compliance Status Response
<p>time and effort records? [EDGAR Cost Principles]</p>	<p>To support a “Yes” response, the LEA/Fiscal Agent should have the following:</p> <ul style="list-style-type: none"> • a list of staff paid with Title III, Part A – Immigrant funds, including percentage of time spent working in program and sufficient information to indicate the work or duties carried out, as appropriate; • Documentation for charges to payroll, as required in the applicable EDGAR cost principle. <p>The LEA/Fiscal Agent could justify a response of “N/A” only if the LEA/Fiscal Agent had <u>no</u> staff who were split-funded with Title III, Part A – Immigrant funds and other funds.</p> <p>The LEA/Fiscal Agent should write the following: “LEA or Fiscal Agent had no staff who were split-funded with Title III, Part A – Immigrant and other funds.”</p>
<p>15. Did the LEA/Fiscal Agent maintain control of Title III, Part A-Immigrant program funds being used to provide equitable services to private school immigrant students and their teachers? [Section 9501(d)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA/Fiscal Agent should have written procedures for approving and processing expenditures related to Title III, Part A – Immigrant services to private schools, as well as accounting records showing the approved expenditures according to the LEA’s/Fiscal Agent’s written procedures.</p> <p>The only reason an LEA/Fiscal Agent could justify a compliance status of “N/A” in response to this question would be that the LEA/Fiscal Agent <u>did not have</u> any participating private non-profit schools in the Title III, Part A – Immigrant program.</p> <p>The LEA/Fiscal Agent should write the following: “LEA or Fiscal Agent did not have any participating private nonprofit schools in the Title III, Part A – Immigrant program.”</p>
<p>16. Did the LEA’s/Fiscal Agent’s Title III, Part A-Immigrant-funded programs provide enhanced instructional opportunities for immigrant children and youth? [Section 3115(e)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA/Fiscal Agent should have a description in the LEA and/or campus plans that shows how the Title III, Part A – Immigrant program enhances instructional opportunities for immigrant children and youth. The LEA/Fiscal Agent should also have documentation that the program beneficiaries are immigrant children and youth.</p> <p>It is highly unlikely that an LEA/Fiscal Agent receiving Title III, Part A – Immigrant funds could justify a compliance status of “N/A” in response to this question.</p>

Title IV, Part A

Program Implementation Question	Compliance Status Response
Needs Assessment	
<p>1. If receiving less than \$30,000, did the LEA have a process to determine the program and/or LEA needs?</p> <p>[Section 4106 (e)(2)(F)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Input of stakeholders, focus groups, advisory committees, district improvement teams • Locally-developed strategies • LEA identified data and reports <p>For each applicable participating program, if compliance status is No, LEA must provide a descriptive narrative to explain the reason for noncompliance.</p>
<p>2. If receiving \$30,000 or more, did the LEA conduct a comprehensive needs assessment (CNA) tied to the three goals of Title IV, Part A?</p> <p>[Section 4106(a)(2) and (d)(1)(A-C)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • <i>Copy of comprehensive needs assessment</i> • <i>Description of strategy used to collect data regarding the needs</i> <p><i>LEA identified data related to students’ access to effective program activities</i> If the response is No, the LEA must provide a descriptive narrative to explain the reason for noncompliance.</p>
<p>3. Did the LEA engage in timely and meaningful consultation with a broad range of stakeholders as part of their process in determining the targeted areas of improvement related to students’ access to effective program activities?</p> <p>[Section 4106(c)(1-2)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • <i>Agendas of focus groups</i> • <i>Sign-in sheets</i> • <i>Meeting minutes</i> <p>If the response is No, the LEA must provide a descriptive narrative to explain the reason for noncompliance.</p>
<p>4. Did the LEA prioritize the distribution of funds to schools identified as one or more of the following?</p> <p>a) are among the schools with the greatest needs</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Examples of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p>

Program Implementation Question	Compliance Status Response
<p>as determined by the LEA</p> <p>b) have the highest percentages or numbers of students from low-income families (as counted for purposes of the LEA's Title I, Part A grant)</p> <p>c) are identified for comprehensive support and improvement under Title I, Part A</p> <p>d) are implementing targeted support and improvement plans under Title I, Part A</p> <p>e) are identified as a persistently dangerous public elementary school or secondary school.</p> <p>[Section 4106(e)(2)(A)(i-v) and (f)]</p>	<ul style="list-style-type: none"> • <i>Copy of Comprehensive Needs Assessment</i> <p><i>District Improvement Plan</i> If the response is No, the LEA must provide a descriptive narrative to explain the reason for noncompliance.</p>
Implementation	
<p>5. Did the LEA identify and implement programs that increase access to educational opportunities for all students, particularly students with disabilities, English learners, economically disadvantaged students, and students who are underrepresented or underserved?</p> <p>[Section 4107(a)(3)(C)(i-ii), (D)(i-ii), (J), and 4109 (a)(6)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Example of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <p>District Improvement Plan.</p> <p>If the response is No, the LEA must provide a descriptive narrative to explain the reason for noncompliance.</p>
Program Evaluation	
<p>6. Did the program periodically evaluate the effectiveness of the programs and/or activities based on the objectives and outcomes?</p> <p>[Section 4106(e)(1)(E)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Example of documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • <i>Copy of annual evaluation</i> <p>If the response is No, the LEA must provide a descriptive narrative to explain the reason for noncompliance.</p>

School Choice Option (Title VIII, Sec. 8532)

Program Implementation Question	Compliance Status Response
Program Coordination/Integration	
<p>1. The LEA, as a condition of receiving funds under the Every Student Succeeds Act, established and implements a policy requiring that:</p> <ul style="list-style-type: none"> • a student attending a persistently dangerous public elementary school or secondary school (as determined by the Texas Education Agency), or • a student who becomes a victim of a violent criminal offense, while in or on the grounds of a public elementary or secondary school that the student attends, is offered and allowed to attend a safe public elementary or secondary school within the local educational agency, including a public charter school. <p>Note: If another campus is not available within the LEA, the policy should provide for other types of services to ensure the safety of the student. In addition, the LEA is encouraged to attempt to secure a cooperative agreement with another LEA to accept transfers when reasonable and appropriate.</p> <p>[Section 8532]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of "NA" in response to this question.</p>
<p>2. The LEA notified parents that their student(s) may transfer and attend a safe public elementary or secondary school within the local educational agency, including a public charter school, for:</p> <ul style="list-style-type: none"> • Students who are enrolled in a persistently dangerous school (Notification was made within 14 calendar days of the start of the school year.) • Students who are victims of a violent criminal act (Notification was made within 14 calendar days of the incident.) <p>[Section 8532]</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status of "Yes".</p> <p>An LEA could justify a compliance status of "NA" in response to this question only if BOTH of the following conditions apply:</p> <ul style="list-style-type: none"> • The LEA has no campuses identified as Persistently Dangerous Schools; <p>AND</p> <ul style="list-style-type: none"> • The LEA had no students who were victims of a violent crime on campus. <p>In this case, check the box in Part 3.2.B that states "The LEA had no campuses identified as Persistently Dangerous schools and the LEA had no students who were victims of a violent crime."</p>
<p>3. If the LEA consolidates administrative funds for ESSA programs, the LEA does not use any other funds under the ESSA programs included in the</p>	<p>On the compliance report, select the type of auditable documentation that an LEA has readily available upon request to support a compliance status</p>

Program Implementation Question	Compliance Status Response
<p>consolidation for administration for the fiscal year of the consolidation.</p> <p>[Section 8203(c)]</p>	<p>of "Yes".</p> <p>The only reason an LEA could justify a compliance status of "NA" in response to this question would be that the LEA does not consolidate administrative funds for ESSA programs.</p> <p>In this case, check the box in Part 3.3.B that states "The LEA does not consolidate administrative funds for ESSA programs."</p> <p>NOTE: The Agency may check the 2018-19 ESSA Consolidated Federal Grant Application BS6001 – Budget Summary and Support – Part 1: Available Funding to determine whether the LEA chose to consolidate administrative funds for any fund source.</p>