

LEA Random Validation Training Phase 2

**LEAs Providing Private Nonprofit (PNP) Equitable Services:
LEA Documented Administration Equitable Services Amounts**

November 2021

**Texas Education Agency
Federal Program Compliance Division**

Program Requirements Selected



Documenting overall compliance for a program requirement may require several forms of documentation to be maintained locally and available upon request by TEA and/or an auditor.

Program Requirements Selected



To ensure overall compliance with program requirements, LEAs should refer to the Program Guide and/or other program-related resources that reference the multiple forms of documentation required to be maintained locally.

Program Requirements Selected



The documentation requested for submission during the random validation process may not include all forms of documentation that are required to be maintained locally.

Documentation for virtual meetings is acceptable.




Given the increased use of virtual meeting environments, participant rosters that include the meeting title, meeting date, and stakeholder names and roles would be acceptable substitutes for the more traditional sign-in sheets. This eliminates the need of a participant signature.

LEA Documented PNP Administration Equitable Services Amounts



Handbook and Submission Packet – PNP *Administration* Amounts




**2021-2022 Random Validation Handbook
for Private Nonprofit (PNP)
LEAs Providing Private Nonprofit
Equitable Services**

**LEA Documented Equitable Services
Administration Amounts**

Federal Program Compliance Division
ESSAsupport@TEA.Texas.gov or
PNPOmbudsman@TEA.Texas.gov

© 2021. Texas Education Agency. All rights reserved.
V 1.0 (10/22/2021)



 2021-2022 Random Validation Submission Packet
Federal Program Compliance Division
Private Nonprofit (PNP): LEA Documented Equitable
Services *Administration* Amounts
Due Date: **January 14, 2022**

Date:		Page 1 of	
ESC:		County District #:	
LEA Name:			
LEA Contact Name:			
LEA Phone:			
LEA Contact Email:			

Submission Instructions

Submit this completed packet, including relevant documentation, by uploading it through the **ESSA Reports** application on TEAL **no later than January 14, 2022**.

Comments (if applicable) Note: If the LEA did not use funds for administration of the PNP program, use this space to indicate such.

For Questions Contact: LaNetra Guess at LaNetra.Guess@tea.texas.gov or
PNPOmbudsman@tea.texas.gov.

8/11/2021
1

Title I, Part A Programs Section 1117(a)(4)(A)

4. Expenditures..—

(A) Determination..—

i. In General.—Expenditures for educational services and other benefits to eligible private school children shall be equal to the proportion of funds allocated to participating school attendance areas based on the number of children from low-income families who attend private schools.

ii. Proportional Share.—The proportional share of funds shall be determined based on the total amount of funds received by the local educational agency under this part prior to any allowable expenditures or transfers by the local educational agency.



ESSA Statutory Requirement – LEA PNP Title VIII *Administration* Amounts

Title VIII Programs Section 8501(a)(4)(A-B)

4. Expenditures.

In General.—Expenditures for educational services and other benefits provided under this section for eligible private school children, their teachers, and other educational personnel serving those children shall be equal, taking into account the number and educational needs of the children to be served, to the expenditures for participating public school children.

Obligation of Funds.—Funds allocated to a local educational agency for educational services and other benefits to eligible private school children shall be obligated in the fiscal year for which the funds are received by the agency.

Code of Federal Regulations (C.F.R.), Title 34, Subtitle B, Chapter II, Subpart E, Section 299.6(a)(2)

Before determining equal expenditures under [paragraph \(a\)\(1\)](#) of this section, an agency, consortium, or entity shall pay for the reasonable and necessary administrative costs of providing services to public and private school children and their teachers and other educational personnel from the agency's, consortium's, or entity's total allocation of funds under the applicable ESEA program.

Assurances Relating to Title I, Part A Programs

- The size and scope of the equitable services to be provided to the eligible private school children, the proportion of funds that is allocated for such services, and how that proportion of funds is determined.
[Page 19, #9(E)]
- The LEA assures it will keep documentation of program descriptions, allowable activities, and expenditures locally and make available upon TEA request for all applicable private non-profit requirements in Sections 1117 and 8501. TEA may request a description of services and use-of-funds documentation later through compliance reports or other TEA reports. (Page 21, #22)

Assurances Relating to Title VIII Programs

The LEA will comply with the uniform provisions for providing services to private schools as specified in Title VIII, Part F, Subpart 1, Private Schools, Sections 8501-8504.



LEA Compliance Report: PNP Compliance Self-Check – LEA PNP *Administration* Amounts

The LEA documented the equitable services *administration* amount used and provided a written explanation to all applicable participating programs.

Documentation Required— LEA PNP *Administration* Amounts

Documentation Required

LEA Documented Equitable
Services Administration
Amounts

Acceptable Documentation

Documentation LEA informed PNP officials during consultation(s) of equitable services administration amount and how it was used.

(For example, amount/percentage of PNP funds appropriated, agenda, meeting minutes, 3rd party/Shared Services Agreement, calculated campus spreadsheet indicating administration amount)

Documentation Required –

Written documentation supporting private nonprofit (PNP) equitable services *administration* Amounts



Issues that may result in an “Improvement Needed” status

- Auditable documentation requested was not submitted
- Documentation submitted does not reference the requested PNP validation requirement
- Documentation from a prior year was submitted instead of current year documentation



PNP Random Validation Timeline

Private Nonprofit (PNP) Random Validation Timeline

Task	Due Date
Email initial notification to LEA administrator regarding program selection. ESC will be copied.	December 1, 2021
ESC staff will contact LEA to: <ul style="list-style-type: none"> confirm receipt of initial notice; confirm access to ESSA Reports on TEAL for appropriate staff; offer technical assistance. 	Contact within 3 business days after notification to LEA. Technical assistance through January 13, 2022
Deadline to upload documentation on ESSA Reports.	January 14, 2022
TEA program staff complete preliminary reviews.	March 11, 2022
TEA contacts ESC regarding LEAs that receive “Improvement Needed” status for ESC review and comment before TEA notifies LEAs.	March 12–April 8, 2022
Notification to LEA administrator of validation results for. ESCs will be copied.	April 26, 2022
ESC technical assistance deadline if LEA receives “Improvement Needed” status regarding any items.	September 29, 2022
ESC provides documentation on ESSA Reports that technical assistance was offered/provided.	September 29, 2022
If the LEA receives “Improvement Needed” status on a program requirement, the LEA will be required to submit documentation for 2022-2023 for the same requirement . The documentation must be uploaded on ESSA Reports.	September 30, 2022



LaNetra Guess
Program Director
Title IV, Part A

Email Address

ESSASupport@tea.Texas.gov