2023-2024 Random Validation Handbook for LEAs Providing Private Nonprofit (PNP) Equitable Services

LEA Maintained Inventory Control of PNP Purchases for Equitable Services

Federal Program Compliance Division

ESSAsupport@TEA.Texas.gov

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Introduction

This Handbook is intended to assist LEAs in completing the 2023-2024 Random Validation process for the requirement that the ***LEA Maintained Inventory Control of Private Nonprofit (PNP) Purchases for Equitable Services***.

Although this document has been prepared for use by those LEAs that are selected to participate in the 2023-2024 Random Validation, LEAs that are not selected may still find the Handbooks useful as tools for conducting a self-check, to ascertain their own compliance status and to determine where improvements may be made.

The Handbooks are available on the Federal Program Compliance Division's web page under "Division Resources."

PNP Random Validation Selected Requirement

ESSA Statutory Requirement	LEA Maintained Inventory Control of PNP Purchases for Equitable Services
ESSA Statutory Citation and Code of Federal Regulations (C.F.R.) Language	**Title I, Part A Program** **Section 1117(d)(1)** - The control of funds provided under this part, and title to materials, equipment, and property purchased with such funds, shall be in a public agency, and a public agency shall administer such funds, materials, equipment, and property. **Title VIII Programs (Titles IC, IIA, IIIA, IVA, IVB)** **Section 8501(d)(1)** The control of funds used to provide services under this section, and title to materials, equipment, and property purchased with those funds, shall be in a public agency for the uses and purposes provided in this Act, and a public agency shall administer the funds and property. - Code of Federal Regulations (C.F.R.), Title 34, Section 76.661(a)(d) An agency, consortium, or entity must keep title to, and exercise continuing administrative control of, all property, equipment, and supplies that the agency, consortium, or entity acquires with funds under a program listed in § 76.661(a)(d) for the benefit of eligible private school children and their teachers and other educational personnel.

ESSA Program-Specific Provisions & Assurances	**Assurances Relating to Title I, Part A** (#17, page 21) The control of Title I, Part A funds, and title to materials, equipment, and property purchased with such funds, shall be in a public agency, and a public agency shall administer such funds, materials, equipment, and property. **Assurances Relating to Title VIII Programs** [Title I, Part C (#5, page 30); Title II, Part A (#5, page 41); Title III, Part A English Learner (#5, page 43); Title III, Part A Immigrant (#5, pages 43); Title IV, Part A (#5, page 47)] 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.
Compliance Report Program Compliance Self-Check Item	LEA procedures were in place ensuring it maintained control of PNP technology, equipment, and supplies purchased for the equitable services program(s).

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

Please include the following selected documentation referenced in the table below in order to demonstrate compliance with the program requirement described above. TEA will utilize the following table to determine if the LEA submitted sufficient documentation to support LEA compliance. LEAs that submit sufficient documentation to support LEA compliance will be assigned a "Met Requirement" status for the requirement. LEAs that submit insufficient documentation will be assigned an "Improvement Needed" status for the requirement. LEAs with an "Improvement Needed" status will be provided technical assistance by their regional education service center (ESC). These LEAs will be required to resubmit documentation for the 2024–2025 school year by September 30, 2024, to ensure the program requirements are implemented correctly.

Type of Selected Documentation Required	Description of Acceptable Documentation
1.1 **LEA Inventory Control Policies and Procedures**	Copy of written policies and procedures regarding purchases of PNP technology, equipment, and supplies for equitable services; **and**
1.2 **LEA Evidence of Inventory Control Consultation**	One sample of dated agendas, consultation notes, and/or other documentation specifying LEA maintains control of PNP purchase(s) for equitable services; **and**
1.3 **LEA Evidence of Inventory Control**	Inventory list of items purchased for PNP equitable services on *one private school campus* for each participating ESSA program (i.e., supplemental property/equipment, materials, supplies, and devices such as laptops, 3-D printer, science/lab equipment, etc.).

Instructions for Assembling Documentation

1. Assemble the requested material into **one PDF file**.
   a. Ensure that the PDF file contains the required documentation as described in the 2023-2024 *LEA Maintained Inventory Control of PNP Purchases for Equitable Services* Random Validation Handbook.
   b. Do not submit extraneous documentation.
   c. When compiling the PDF file for submission, please ensure that—
      - the pages are not compressed or reduced in size;
      - any landscape pages are oriented with their right-hand edge at the top;
      - the documentation pages included are **numbered consecutively in the lower right corner.** These page numbers, which may be hand-written if that is most convenient, should be the ones referenced in the online WorkApp Details Form.
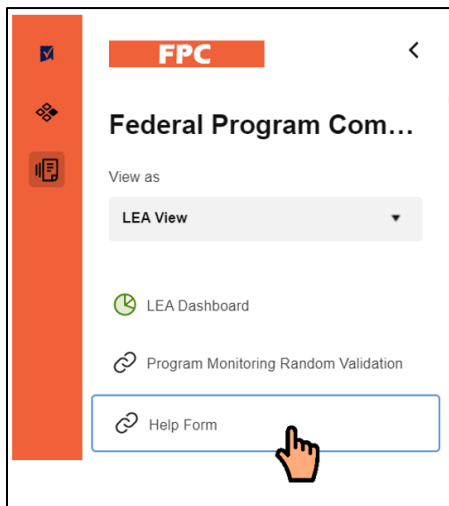
Instructions for Submitting Documentation

WorkApp System Access

Please note that the LEA staff submitting documentation will need access to the Department of Grant Compliance and Administration WorkApp System.

Currently, the superintendent, chief financial officer, and federal program director listed in AskTED have been given access to the system. To add or change the individuals with access to the system, **someone with existing access** must request access for the new individual via the Help Form in the Federal Program Compliance Program Monitoring Random Validations WorkApp as referenced below. The additional staff to be added to the system must agree to certain security requirements.

NOTE: Each LEA is only guaranteed a certain number of access accounts at this time.

Submitting Documentation

Please note that some of the screen captures referenced in the steps below will show information that is specific to a Title I, Part A program requirement. When you log in to the system, the information referenced will include the information specific to the program and requirement for which your LEA was selected to submit documentation.

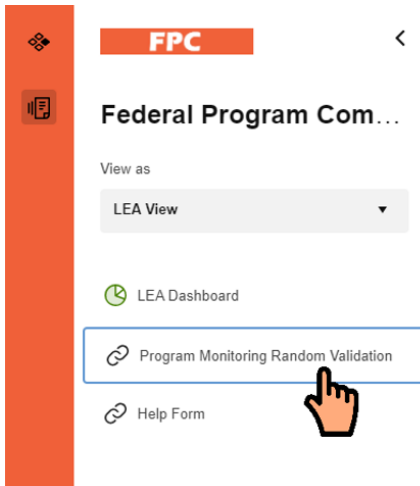1. Login to the Department of Grant Compliance and Administration WorkApp System: https://workapps.smartsheet.com/.
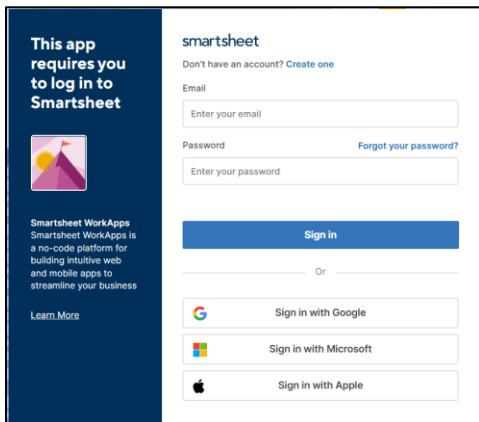
2. Click on the Federal Program Compliance Division WorkApp Tile.

Federal Program Compliance Division

Tip: If the FPC WorkApp Tile is not showing, click on the menu icon to display all the Apps.
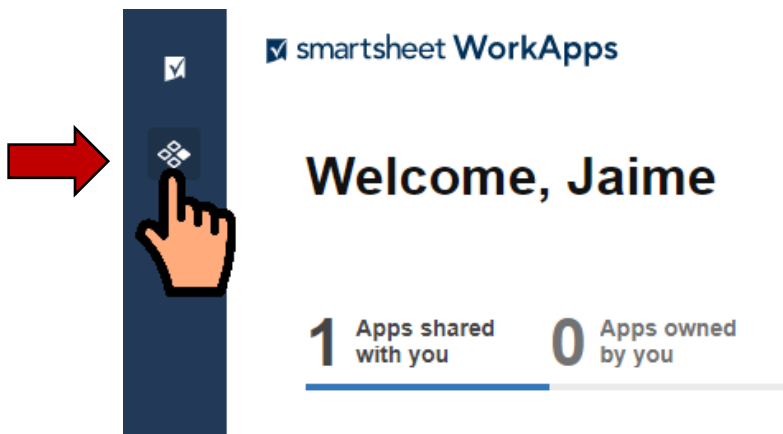
3. Click on the Program Monitoring Random Validation Link.

4. Click on the Random Validation Line to access the Details Form – Data & Attachments Tabs.
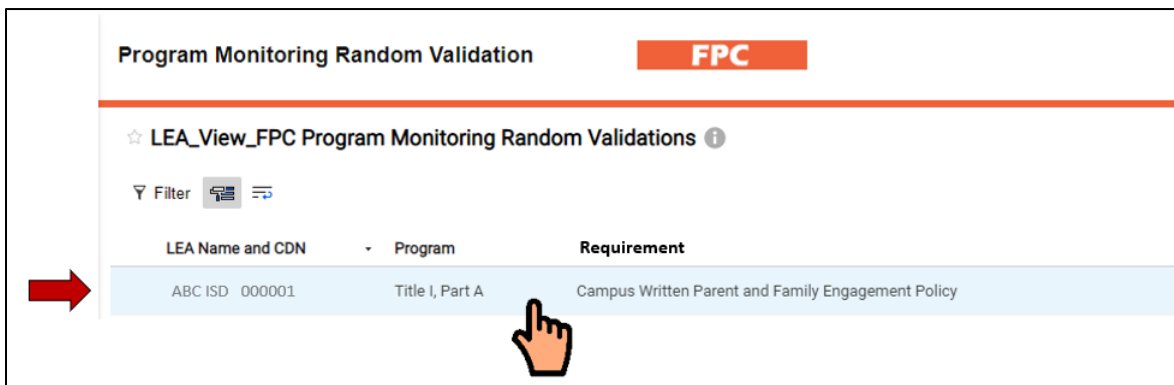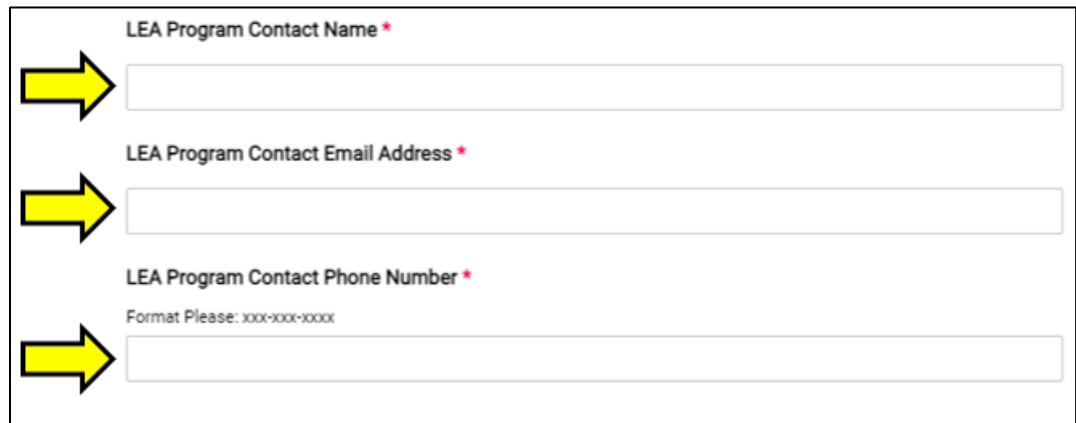
5. Complete the Details Form – Data Tab.
    a. Type the page number(s) where the requirement(s) is addressed in the LEA's documentation to be submitted in the "Requested Documentation Page Number(s)" field(s). Be as specific as possible in order to facilitate the auditor's review process. For example, if relevant items appear on pages 2, 4, and 5, please list pages 2, 4, and 5, rather than pages 1-5 in the "Requested Documentation Page Number(s)" field. **These fields are required.**

b. Scroll down to access the rest of the form. Complete the remaining fields with the information for the LEA Program Contact. The LEA Program Contact should be the person that is most familiar with the documentation submitted. This is the person that TEA will contact if additional documentation is needed and/or if clarification is needed on documentation submitted. ***The following fields are required.**
  i. Type the name of the LEA Program Contact in the "LEA Program Contact" field.
  ii. Type the email address of the LEA Program Contact in the "LEA Program Contact Email Address" field.
  iii. Type the phone number of the LEA Program Contact in the "LEA Program Contact Phone #" field. Please use the following format: ###-###-####.

LEA Program Contact Name *

LEA Program Contact Email Address *

LEA Program Contact Phone Number *
Format Please: xxx-xxx-xxxx

c. Add LEA Comments. This section is optional if the LEA would like to provide additional information that will be helpful for the reviewer.

LEA Comment

d. Select your LEA's Submission Status from the following options available: In Process (Saved data/will complete later) or Submission Complete (Data entered and documentation attached). ***Selecting a status is required. If the first option remains selected after the submission due date, your submission is not considered complete, and TEA will contact you.**

LEA Submission Status *

6. Click "Save" in the bottom right-hand corner of the Details Form – Data Tab. This will save the information that was typed in the details form under the data tab (documentation page numbers, LEA Contact information, and LEA Comments, if applicable). **This step is required.**
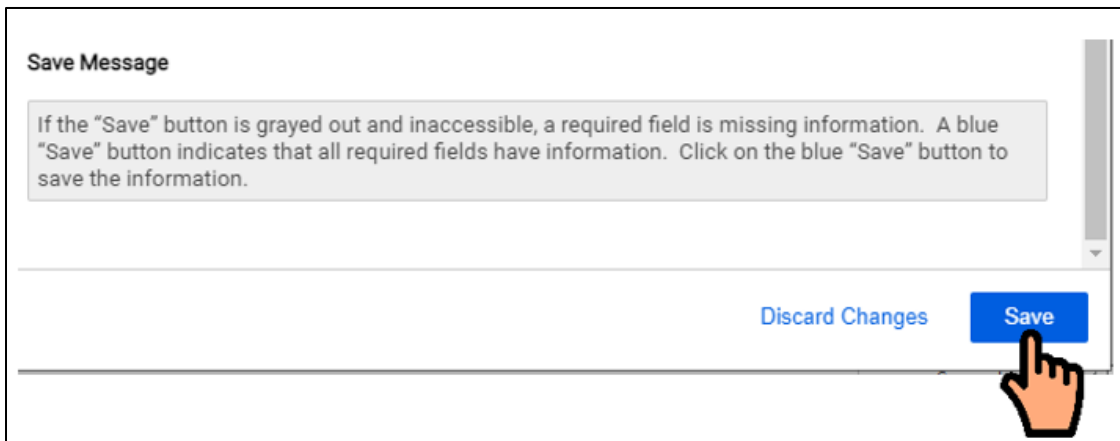

7. Attach the requested documentation in pdf file format. All documentation should be attached as a single file. **Attaching documentation is required.**
    a. To attach the PDF file containing the LEA's documentation, click on the "Attachments" Tab on the Details Form; then click on the "Attach a File" button located at the bottom of the Details Form – Attachments Tab.
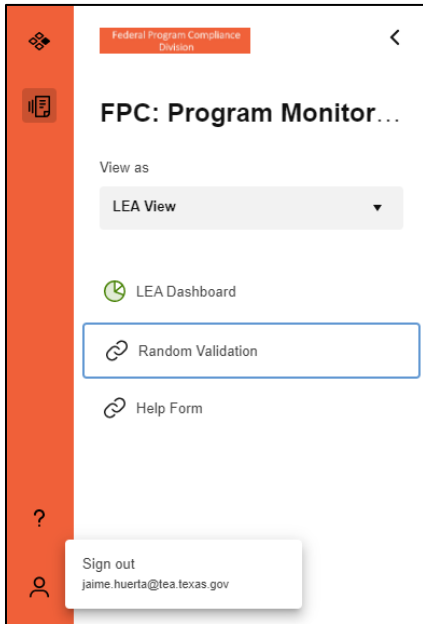
b. Browse your computer and locate the documentation file to be attached; select the file; the File Name will appear in your file browser; click on "Open;" confirm that the file is listed as an attachment in the Details Form – Attachments Tab.
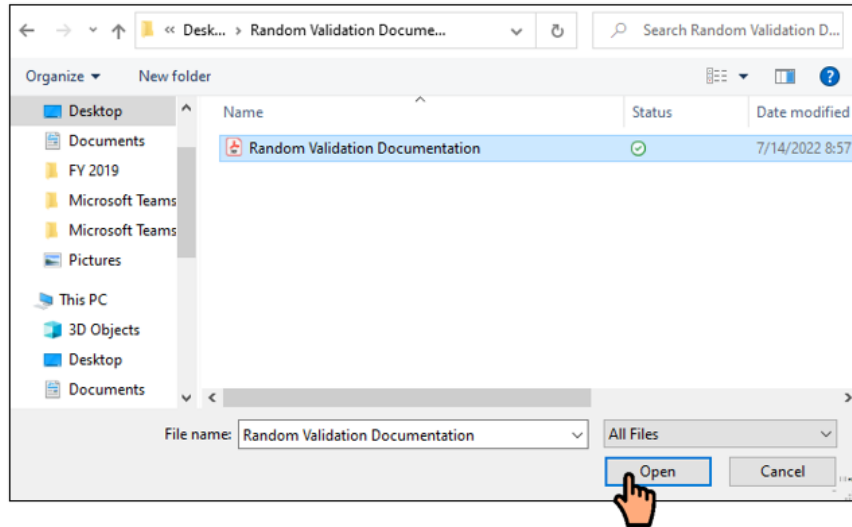
c. Confirm that the document you are attaching is listed as an Attachment. Click on the "x" at the top right-hand corner to close the Details Form.
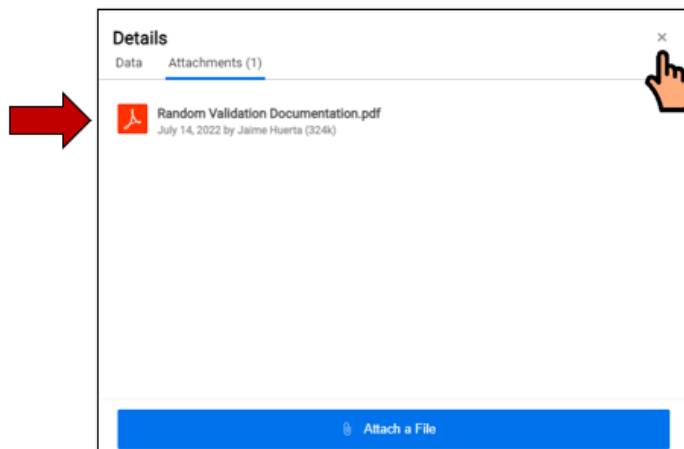
8. Sign out of the Department of Grant Compliance and Administration WorkApp System by clicking on the ![person icon] icon located in the bottom left-hand corner of the window and selecting "Sign out."

Phase 2 Random Validation Timeline

Task	Due Date
Federal Program Compliance (FPC) Random Validation (RV) WorkApp LEA contacts receive initial notification regarding program selection. Education Service Center (ESC) FPC RV WorkApp Contacts will be copied.	**November 28, 2023**
ESC staff will contact LEA to: • confirm receipt of initial notice; • confirm access to FPC RV WorkApp for appropriate staff; • offer technical assistance.	Contact within 1 business day after initial notification to LEA. Technical assistance through **December 12, 2023**
Deadline to submit documentation via the FPC Random Validation WorkApp System.	**December 12, 2023**
TEA program staff complete preliminary reviews.	**February 5, 2024**
TEA contacts ESC regarding LEAs that receive "Improvement Needed" status for ESC review and comment before TEA notifies LEAs.	**February 15, 2024 – March 1, 2024**
FPC RV WorkApp LEA contacts receive notification of validation results. ESC FPC RV WorkApp Contacts will be copied.	**March 18, 2024**
ESC technical assistance deadline if LEA receives "Improvement Needed" status regarding any items.	**September 30, 2024**
ESC submits documentation in the FPC RV WorkApp System that technical assistance was offered/provided.	**September 30, 2024**
If the LEA receives "Improvement Needed" status on a program requirement, the LEA will be required to submit documentation for 2024-2025 for the same requirement. The documentation must be submitted in the FPC RV WorkApp System.	**September 30, 2024**