

## 2025-2026 Program Monitoring Validation Guidance Document

**Program:** Private Nonprofit (PNP) Equitable Services

**Requirement:** LEA Maintained Inventory Control of PNP Purchases for Equitable Services

### Documentation Requested

Documenting overall compliance with 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, school systems 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 validation process may not include all forms of documentation required to be maintained locally.

Please include the following selected documentation referenced in the table below to demonstrate compliance with the program requirement described. TEA will utilize the following table during the review of documentation to determine if the school system submitted sufficient documentation to support compliance.

**The documentation submitted for TEA review should show evidence of compliance in the 2024-2025 grant year for the program requirement selected.**

The following documentation is requested to be submitted **by 5:00 pm CST on or before December 19, 2025**, via the Federal Program Compliance Division Program Monitoring Validations Smartsheet WorkApp system.

Selected Documentation Required to be Submitted for Review	Year of Documentation Requested	Description of Acceptable Documentation
<b>1.1 LEA Inventory Control Policies and Procedures</b>	2024-2025	Documentation of the 2024-2025 LEA's written inventory policies and procedures for purchases of PNP technology, equipment, and supplies for equitable services; <i>and</i>
<b>1.2 LEA Evidence of Inventory Control - Consultation</b>	2024-2025	One (1) sample of 2024-2025 dated agendas, consultation notes, or other auditable documentation specifying LEA maintained control of PNP purchase(s) for equitable services; <i>and</i>
<b>1.3 LEA Evidence of Inventory Control - List</b>	2024-2025	Documentation of the LEA's 2024-2025 Inventory list of items purchased for PNP equitable services on one (1) 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

Assemble the requested material into **one PDF file**.

- a. Ensure that the PDF file contains the required documentation as described above.
- 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 handwritten if that is most convenient, should be referenced in the online WorkApp Details Form.

School systems may reference the 2025-2026 Program Monitoring Validation Process Handbook for general information about the overall process (i.e., documentation submission instructions, documentation review process, and additional resources).

## Resources

Each regional Education Service Center (ESC) is required to offer and provide technical assistance related to the program monitoring validation process. Please consult with ESC staff if there are questions or additional information is needed.

The following resources are also available on the [TEA ESSA Program Monitoring Validations webpage](#):

- Program-Specific Training Video and Slides;
- Instructions for Submitting Documentation, Training Video, and Slides;
- Overview of the 2025-2026 Program Monitoring Validation Process Training Video, Slides, and Handbook

## Statutory Requirement References

The requirement is referenced in the following documents.

<b>Every Student Succeeds Act (ESSA) Citation, Statute, &amp; Code of Federal Regulations (CFR) Language</b>	<p><b><u>Title I, Part A Program</u></b> <b><u>Section 1117(d)(1)</u></b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b><u>Title VIII Programs (Titles IC, IIA, IIIA, IVA, IVB)</u></b></p> <ul style="list-style-type: none"> <li><b>Section 8501(d)(1)</b> 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.</li> <li>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 §299.6(b) for the benefit of eligible private school children and their teachers and other educational personnel.</li> </ul>
<b>ESSA Program-Specific Provisions &amp; Assurances</b>	<p><b>Assurances Relating to Title I, Part A</b> (#17, page 32)</p> <p>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.</p> <p><b>Assurances Relating to Title VIII Programs</b></p> <p>Title I, Part C, Migrant (#5, page 44); Title II, Part A (#5, page 58); Title III, Part A English Learner (#5, page 62); Title III, Part A-Immigrant (#5, page 64); Title IV, Part A (#5, page 69)</p> <p>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.</p>
<b>Compliance Report Program Compliance Self-Check Item</b>	<p>LEA procedures were in place, ensuring it maintained control of PNP technology, equipment, and supplies purchased for the equitable services program(s).</p>

## Contact Information

For assistance with questions and/or additional information, please contact the Federal Program Compliance Division at [ESSAsupport@TEA.Texas.gov](mailto:ESSAsupport@TEA.Texas.gov). A directory of TEA program-specific staff contacts is also available: [Federal Program Compliance Division Program Staff Contacts](#).