



# Federal Program Compliance Division Program Monitoring Validations

## ESSA Private Nonprofit Schools (PNP) Equitable Services:

### LEA Inventory Control of Purchases for Equitable Services

September 2025

# Legal Disclaimer

1. This presentation is intended solely to provide general information and guidance to Texas LEAs, ESCs, non-profit subgrantees, and participating Private Schools receiving equitable services. The content in this presentation reflects the Texas Education Agency's current understanding of statute and applicable federal guidance.
2. The content of this presentation is subject to change as a result of future guidance and or other updates provided by federal agencies with regulatory oversight of these programs.
3. This presentation does not constitute legal advice, and entities are, therefore, advised to seek legal counsel regarding the information and guidance provided in this presentation before acting upon the information provided.

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# Documentation Requested



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 validation process may not include all forms of documentation that are required to be maintained locally.

# Meeting Documentation

**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.

## **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**

### **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.

# ESSA Statutory Requirement – LEA Maintained Inventory Control of Title VIII Purchases for Equitable Services – 34 CFR 76.661

## Code of Federal Regulations (C.F.R.), Title 34, Section 76.661

- (a) Under some program statutes, a public agency must keep title to and exercise continuing administrative control of all equipment and supplies that the subgrantee acquires with program funds. This public agency is usually the subgrantee.
- (b) The subgrantee may place equipment and supplies in a private school for the period of time needed for the project.
- (c) The subgrantee shall ensure that the equipment or supplies placed in a private school:
  - (1) Are used only for the purposes of the project; and
  - (2) Can be removed from the private school without remodeling the private school facilities.
- (d) The subgrantee shall remove equipment or supplies from a private school if:
  - (1) The equipment or supplies are no longer needed for the purposes of the project; or
  - (2) Removal is necessary to avoid use of the equipment of supplies for other than project purposes.



## **Assurances Relating to Title I, Part A**

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**

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 Maintained Inventory Control of Purchases for PNP Equitable Services

LEA procedures were in place, ensuring it maintained control of PNP technology, equipment, and supplies purchased for the equitable services program(s).

# Documentation Required— LEA Maintained Inventory Control of Purchases for Equitable Services

## Documentation Required

### 1.1

LEA Internal Control  
Policies and Procedures

### 1.2

LEA Evidence of Inventory  
Control Consultation

### 1.3

LEA Evidence of Inventory  
Control - List

## Acceptable Documentation

**1.1** - Documentation of the 2024-2025 LEA's written inventory policies and procedures for purchases of PNP technology, equipment, and supplies for equitable services; *and*

**1.2** – 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; *and*

**1.3** – 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.).

# LEA Maintained Inventory Control of Purchases for Equitable Services for Equitable Services

## ***Documentation Required –***

Written documentation supporting LEA Internal Control Policies and Procedures



## ***Issues that may result in an “Improvement Needed” status***

- Auditable documentation requested from the applicable year was not submitted
- Documentation submitted did not specify the requested PNP validation requirements
- Documentation did not provide applicable year inventory purchases per participating PNP school
- Documentation did not indicate LEA maintained control of purchases during the applicable year



# Resources and Support

# 2025-2026 Program Monitoring Validations Process

## Online Resources



- **Overall Process Resources**

- 2025-2026 PMV Process Handbook
- Instructions for Submitting Documentation, Training Video, and Training Slides
- Navigating the Smartsheet WorkApp System Video

- **Program-Specific Resources**

- Guidance Documents for each Program/Requirement
- Training Videos and Training Slides for each Program/Requirement


[ESSA Program Monitoring Validations Webpage](#)

# Federal Program Compliance Division Program Monitoring Validations – Inventory Control

## [ESSA Program Monitoring Validations Webpage](#)

### Guidance Document



Federal Program Compliance Division


### 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 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 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 LEA submitted sufficient documentation to support LEA 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
1.1 LEA Inventory Control Policies and Procedures	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>
1.2 LEA Evidence of Inventory Control - Consultation	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>
1.3 LEA Evidence of Inventory Control - List	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**

Federal Program Compliance Division
V1.0 07/14/2025
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### Training Slides




**2025-2026**  
Program Monitoring Validations (PMV) Training

LEAs Providing Private Nonprofit (PNP) Equitable Services:  
LEA Inventory Control of Purchases for Equitable Services

September 2025

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### Training Video



**2024-2025**  
Program Monitoring Validations (PMV)

LEAs Providing Private Nonprofit (PNP) Equitable Services:  
LEA Inventory Control of Purchases for Equitable Services

November 2024

Texas Education Agency  
Federal Program Compliance Division

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# Federal Program Compliance Division

## Program Monitoring Validations – Inventory Control (continued)

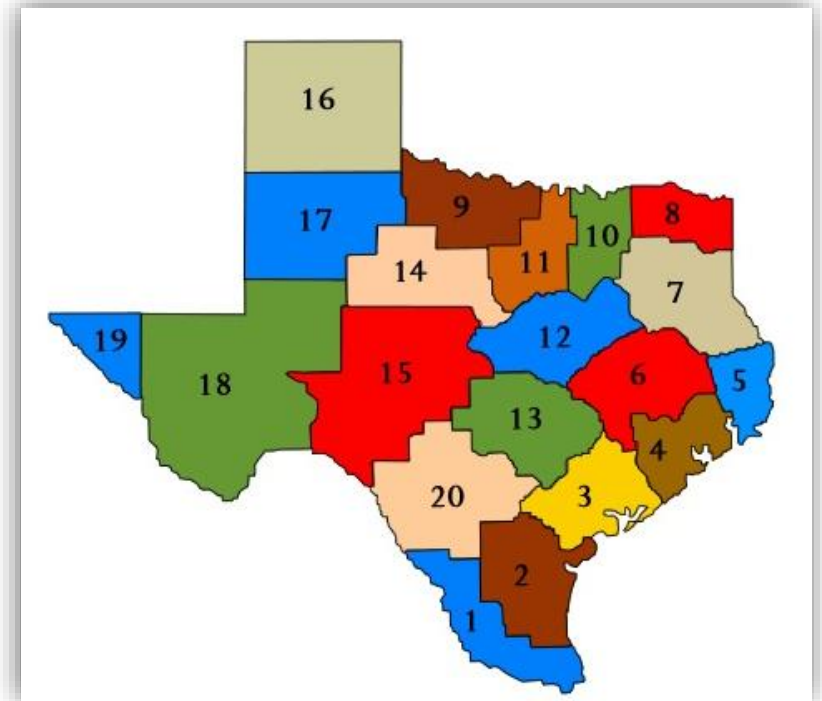


- Education Service Center (ESC) Support
  - Complimentary technical assistance and training are available from each regional ESC

# Education Service Center ESSA Basic Services Initiative

## LEA Private Nonprofit (PNP) Equitable Services Training, Technical Assistance and Guidance

- LEA PNP Equitable Services Requirements for Title I, Part A, and Title VIII Programs
- LEA ESSA Consolidated Grant Application, PS3099 Schedule
- LEA ESSA Consolidated Compliance Report, PR3099 Schedule
- **LEA PNP Equitable Services Program Monitoring Validations**



# THANK YOU



**For all you do for the students and families you serve everyday!  
You make a difference!**

# Federal Program Compliance Division Contact Information



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