



2021-2022 Random Validation Handbook for Private Nonprofit (PNP)

LEAs Providing Private Nonprofit Equitable Services

LEA Maintained Inventory Control of PNP Purchases for Equitable Services

Federal Program Compliance Division

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Introduction

This Handbook is intended to assist LEAs in completing the 2021-2022 Random Validation process for the requirement that the **LEA Maintained Inventory Control of Private Nonprofit (PNP) Purchases for Equitable Services**. It should be used in conjunction with the 2021-2022 Random Validation Submission Packet for the same requirement.

Although these documents have been prepared for use by those LEAs that are selected to participate in the 2021-2022 Random Validation, LEAs that are not selected may still find them useful as tools for conducting a self-check, to ascertain their own compliance status and to determine where improvements may be made.

The Submission Packets and the Handbooks are available on the Federal Program Compliance Division’s web page under “Division Resources.”

PNP Selected Requirement

Statutory Requirement	LEA Maintained Inventory Control of PNP Purchases for Equitable Services
<p>ESSA Statutory Citation/Code of Federal Regulations (C.F.R.) and Language</p>	<p><u>Title I, Part A Program</u> Section 1117(d)(1)</p> <ul style="list-style-type: none"> ▪ 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. <p><u>Title VIII Programs</u> Section 8501(d)(1)</p> <ul style="list-style-type: none"> ▪ 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. <p>Code of Federal Regulations (C.F.R.), Title 34, Subpart E, Section 299.9(a)</p> <p>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.</p>
<p>ESSA Program-Specific Provisions & Assurances</p>	<p>Assurances Relating to Title I, Part A (page 20, #17) The control of Title I, Part A funds, and title to materials, equipment, and property purchased with such funds, shall be in a</p>

	<p>public agency, and a public agency shall administer such funds, materials, equipment, and property.</p> <p>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.</p>
Compliance Report—Program Compliance Self-Check	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 with the completed submission packet in order to demonstrate compliance with the program requirement described above:

Type of Selected Documentation Required	Description of Acceptable Documentation
LEA Internal Control Policies and Procedures	<ul style="list-style-type: none"> • Copy of written policies and procedures regarding purchases of PNP technology, equipment, and supplies for equitable services; <i>and</i> • 1 sample of dated agendas, consultation notes, and/or other documentation specifying LEA maintains control of PNP purchase(s) for equitable services; <p style="text-align: center;"><i>and</i></p> <ul style="list-style-type: none"> • Inventory list of items purchased for PNP equitable services on 1 private school campus for each participating ESSA program.

Note:

1. Validation requirements will receive a designation of “Met Requirement” or “Improvement Needed” during the validation review.

Instructions for Completing Submission Packet

Use the 2021-2022 Validation Checklist in the Submission Packet to review the LEA's compliance with the requirement that the **LEA Maintained Inventory Control of PNP Purchases for Equitable Services**. In the left-hand column write the page number where the requirement(s) is addressed in the LEA's documentation. Be as specific as possible in order to facilitate the auditor's review process.

Please leave the two right-hand columns blank, as these will be completed by TEA staff during their review of the documentation submitted.

Do not submit extraneous documentation.

Instructions for Uploading Documentation

Follow these steps to submit your Random Validation Submission Packet and supporting documentation, as applicable, through the secure *Every Student Succeeds Act (ESSA) Reports* application via TEAL.

1. Complete the *2021-2022 Random Validation Submission Packet* for **LEA Maintained Inventory Control of PNP Purchases for Equitable Services** as a Word file (**Response Document**).
2. Assemble the requested documentation material into **a separate PDF file** (**Supporting Document**):
 - a. Required documentation as described in the 2021-2022 Random Validation Handbook for **LEA Maintained Inventory Control of PNP Purchases for Equitable Services**.

Note: When compiling the pdf file for submission, please ensure that—

- the pages are not compressed or reduced in size or double-sided;
- 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, beginning with the submission information as page 1. These page numbers, which may be hand-written if that is most convenient, should be the ones referenced in the left-hand column of this guidance document.

3. Log on to the TEA Login ([TEAL](#)).
4. Select *Every Student Succeeds Act (ESSA) Reports* application.
5. Select "Upload Response Documents" tab.

Submission of the *2021-2022 Random Validation Submission Packet* for LEA Maintained Inventory Control of PNP Purchases for Equitable Services.

From the dropdown menus:

6. Response Template Title: Select **“PNP LEA Inventory Control.”**
7. School Year: Select **“2021-2022.”**
8. Response Doc Type: Select **“Response Document.”**
9. Click **“Choose File”** to browse for the file location on your computer. **(Please upload the Submission Packet as a Word document and not a pdf of the document.)**
10. Click **“Upload Document”** button.

(Sample Screen Shots of ESSA Reports)

The screenshot shows the 'ESSA Reports' interface. At the top, there are three buttons: 'View Reports & ISD Responses', 'Download Response Templates', and 'Upload Response Documents'. Below these is a form with the following fields and buttons:

- Response Template Title:** A dropdown menu with 'PNP LEA Inventory Control' selected. A red arrow points to the dropdown arrow.
- School Year:** A text input field with '2021-2022' entered. A red arrow points to the input field.
- Response Doc Type:** A dropdown menu with 'Response Document' selected. A red arrow points to the dropdown arrow.
- Choose File:** A button labeled 'Choose File' next to the text 'No file chosen'. A red arrow points to the button.
- Upload Document:** A button labeled 'Upload Document'. A red arrow points to the button.

Note: Maximum allowable file size is 10 MB.

Submission of the 2021-2022 Random Validation Submission Packet for LEA Maintained Inventory Control of PNP Purchases for Equitable Services

From the dropdown menus:

11. Repeat steps 4-7 referenced above.
12. Response Doc Type: Select **“Supporting Document.”**
13. Click **“Choose File”** to browse for the file location on your computer. **(Please upload a pdf document.)**
14. Click **“Upload Document”** button.

(Sample Screen Shots of ESSA Reports)

The screenshot shows the 'ESSA Reports' interface with the following fields and buttons:

- Response Template Title:** A dropdown menu with 'PNP LEA Inventory Control' selected. A red arrow points to the dropdown arrow.
- School Year:** A text input field with '2021-2022' entered. A red arrow points to the input field.
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- Choose File:** A button labeled 'Choose File' next to the text 'No file chosen'. A red arrow points to the button.
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Note: Maximum allowable file size is 10 MB.

Private Nonprofit (PNP) Random Validation Timeline

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