

# LEA Random Validation Training Phase 2

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



# Handbook and Submission Packet – LEAs PNP Equitable Services Amounts



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

### LEAs Providing Private Nonprofit Equitable Services

### LEA Documented PNP Equitable Services Amounts

Federal Program Compliance Division  
[ESSAsupport@TEA.Texas.gov](mailto:ESSAsupport@TEA.Texas.gov) or  
[PNPOmbudsman@TEA.Texas.gov](mailto:PNPOmbudsman@TEA.Texas.gov)

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

Date:	<input type="text"/>	Page 1 of	<input type="text"/>
ESC:	<input type="text"/>	County District #:	<input type="text"/>
LEA Name:	<input type="text"/>		
LEA Contact Name:	<input type="text"/>		
LEA Phone:	<input type="text"/>		
LEA Contact Email:	<input type="text"/>		

#### 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):

For Questions Contact: LaNetra Guess at [LaNetra.Guess@tea.texas.gov](mailto:LaNetra.Guess@tea.texas.gov) or  
[PNPOmbudsman@tea.texas.gov](mailto:PNPOmbudsman@tea.texas.gov).

8/11/2021

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# ESSA Statutory Requirement – Title I, Part A PNP Equitable Services Amounts

## **Title I Program 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 – Title VIII PNP Equitable Services Amounts

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

### 4. Expenditures.

#### In General.—

A. 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.

B. 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 299.7\(a\)](#)

## Assurances Relating to Title I, Part A Program

- 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. [Pages 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 – PNP Equitable Services Amounts

The LEA documented the PNP equitable services amounts used and provided a detailed explanation of the amounts provided to PNP officials for all applicable participating programs.

# Documentation Required— LEAs PNP Equitable Services Amounts

## **Documentation Required**

LEA documented equitable services amounts

## **Acceptable Documentation**

- Documentation LEA informed PNP officials of fiscal requirements that include equitable services amounts **for 1 private school campus** (i.e., agenda, meeting minutes, LEA program summaries, timeline of professional development travel and PNP purchase requests, calendar of program services with equitable services amounts, or other documentation meeting requirement); or
- Documentation LEA shared calculated equitable services amounts by program **for 1 PNP school campus** (i.e., LEA calculations by PNP campus and program level, calculation formulas per PNP campus, etc.); or
- Written procedures and documentation that provided verification/tracked LEA PNP purchases that include equitable services amounts **for 1 private school campus**

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



LaNetra Guess  
Program Director  
Title IV, Part A