

LEA Random Validation Training Phase 2

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

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.

PNP Equitable Services:

LEA Maintained Inventory Control of Purchases for Equitable Services



Handbook and Submission Packet – LEA Maintained Inventory Control of Purchases for Equitable Services




**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
ESSAsupport@TEA.Texas.gov or
PNPOmbudsman@TEA.Texas.gov

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2021-2022 Random Validation Submission Packet
Federal Program Compliance Division
Private Nonprofit: LEAs Maintained Inventory Control of
PNP Purchases for Equitable Services
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 or PNPOmbudsman@tea.texas.gov.

8/11/2021
1

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.

[Code of Federal Regulations \(C.F.R.\), Title 34, Subpart E, Section 299.9\(a\)](#)

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.

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 public agency, and a public agency shall administer such funds, materials, equipment, and property.



ESSA Consolidated Application – LEA Maintained Inventory Control of Title VIII PNP Purchases Program-Specific Provisions and Assurances

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

Documentation Required

LEA Internal
Control Policies
and Procedures

Acceptable Documentation

- Copy of written policies and procedures regarding purchases of PNP technology, equipment, and supplies for equitable services; ***and***
- ***1 sample*** of dated agendas, consultation notes, and/or other documentation specifying LEA maintains control of PNP purchase(s) for equitable services; ***and***
- Inventory list of items purchased for PNP equitable services on ***1 private school campus*** for each participating ESSA program.

Documentation Required –

Written documentation supporting LEA Internal Control Policies and Procedures



Issues that may result in an “Improvement Needed” status

- Auditable documentation requested was not submitted
- Documentation submitted does not reference each of the **3** requested PNP validation requirements
- Documentation from a prior year was submitted instead of current year documentation



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



LaNetra Guess
Program Director
Title IV, Part A

Email Address

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