

## Department of Grant Compliance and Administration

### Statewide Training Series

## Questions & Answers

**Training Title:** Title I, Part A Random Validations—Common LEA Issues

**Training Date:** 5/9/2023

*For additional information, please contact us at [ESSASupport@tea.texas.gov](mailto:ESSASupport@tea.texas.gov).*

**Question 1:** Many of the campuses perform their CNA in the Spring prior to the start of the school year. If the CNA date reflects a Spring date, does this meet the validation requirement?

**Answer 1:** You are correct that many LEAs start their planning process in the Spring prior to the beginning of the school year, so we do expect to see meeting dates and other documentation from the Spring. The description of the campus's CNA process should reflect that timeline. The meeting documentation should include the date of the meeting, but also note (perhaps in the name of the meeting) that it is for the upcoming school year.

For example, part of a campus's CNA description might look something like this:

"The campus's CNA process includes sub-committees that meet 3-4 times throughout the Spring to ascertain campus needs for the upcoming school year related to the following areas: School Climate, Professional Development, Teacher Recruitment and Retention, Curriculum and Assessment, Student Performance, Technology, and Parent and Family Engagement. In assessing these areas, the stakeholders consider the following data: student and teacher demographics; student performance data; student, teacher, and parent surveys; teacher evaluations; ..."

The heading on the agenda for one of the Spring meetings might look like this:

"2023-24 Comprehensive Needs Assessment for ABC Elementary  
Sub-Committee Meeting on Professional Development  
Agenda  
March 25, 2023"

**Question 2:** If the CNA process description only includes 1 meeting date (not multiple as recommended), then will that trigger an "improvement needed" status?

**Answer 2:** If the CNA process description implies that the entire CNA process occurred during a single meeting, and all the other required components were included, the LEA's random validation result might be "met requirement," but it would contain a recommendation expressing concern about

the “comprehensive” nature of the CNA. This would especially be true if the meeting documentation indicated that the process was completed in a meeting that lasted only an hour.

**Question 3: What is an example of "other members of the community to be served"?**

Answer 3: “Other members of the community” could include members of civic organizations, business owners, local officials, and/or volunteers.

**Question 4: Is the requirement for a Stakeholder "listing" or a listing along with sign in sheet that includes Stakeholder roles?**

Answer4: A list of the stakeholders with their roles should be included with both the CNA description and the Campus Improvement Plan (CIP). It may be the same group for both. The documentation for meetings should include a sign-in sheet or participant roster that has both the names and the roles, so that attendance and participation in the process is documented.

**Question 5: Can pastors from community churches be included in the “community” category of stakeholders?**

Answer 5: Pastors from community churches could be included in the “community” category, with the understanding that their role be as a member of the community, not in a religious capacity.

**Question 6: Can the "community members role" be filled by a parent of the campus? What about an employee of the district that has a business in the community - can they fill the role of "community member"?**

Answer 6: The Texas Education Code [11.251] states that “For purposes of establishing the composition of committees under this section:

- (1) a person who stands in parental relation to a student is considered a parent;
- (2) a parent who is an employee of the school district is not considered a parent representative on the committee;
- (3) a parent is not considered a representative of community members on the committee; and
- (4) community members must reside in the district and must be at least 18 years of age.”

**Question 7: What is the ramification of having only one Campus Improvement Plan meeting with the required stakeholders? Campus principals and district leadership feel as though one meeting is sufficient.**

Answer 7: If the LEA and campus can document that the results of the campus’s Comprehensive Needs Assessment have been considered and appropriately incorporated into the Campus Improvement

Plan, and that all required stakeholders have had meaningful input into the development of and any necessary revisions to the plan, the campus may be able to justify that a single Campus Improvement Plan meeting is sufficient. However, the LEA and campus would need to ensure that the meeting involved more than just a rubber-stamp approval of the plan.

**Question 8: If stakeholders do not show up for the meeting(s), but we send out the information to them and ask for feedback and have evidence of that, does that support that we are making the efforts to get stakeholders involved?**

Answer 8: Obtaining input from all required stakeholder categories is a challenge for many campuses, but it is **not** sufficient simply to document that the required stakeholders were invited to the meeting(s). One of the advantages of having a longer planning process rather than a single event is that it involves multiple opportunities for participation. If attendance at in-person meetings is problematic, the campus should consider what barriers might exist that prevent stakeholder participation and take steps to address those barriers. Perhaps it is the time of the meeting or the location of the meeting that is part of the problem. Or maybe there are childcare or transportation issues involved. The advantages of an in-person meeting are in the relationships that can be built and the give-and-take of the discussions that can occur, but it may be that the campus needs to work on solidifying some of those relationships to build trust and encourage meaningful involvement. In addition to in-person meetings, the campus could supplement its stakeholder involvement through surveys or by providing the option of attending meetings online.

**Question 9: Does the required stakeholder committee need to “approve” the written Parent and Family Engagement (PFE) policy? Or is it okay if a separate committee of parents/staff simply reviews, revises, and approves?**

Answer 9: The Title I, Part A statute states: “The campus shall involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of Title I, Part A programs, including the planning, review, and improvement of the school's PFE policy and the joint development of the Schoolwide program plan under section 1114(b) [Campus Improvement Plan], except that **if a school has in place a process for involving parents in the joint planning and design of the school's programs, the school may use that process, if such process includes an adequate representation of parents of participating children.**” Section 1116(c)(3). [emphasis added]

The LEA and campus would need to ensure that its process includes “an adequate representation of parents of participating children.”

**Question 10: Can we redact information from the PFE policy that is not relevant to the Random Validation Request?**

Answer 10: When responding to a Random Validation Request, the LEA should ensure that it is providing documentation that addresses the question that is asked. If the request concerns a specific requirement within a larger document, the LEA may submit the title page and any relevant pages from the document, in lieu of submitting the document in its entirety. The LEA may also mark specific sections of the relevant pages as addressing the item requested. If the LEA chooses to

redact information, obviously the redacted information will not be considered as documentation for the requirement being validated. If the unredacted information is deemed to be insufficient, the LEA would receive an “Improvement Needed” status for the validation.

**Question 11: In the past, for documents that are required to be distributed to parents and family members of students being served in a Title I, Part A program, we distributed hard copies and posted them to the website. Is it okay to use only electronic website postings as a single method of distribution?**

Answer 11: It is not advisable for the LEA to rely solely on web postings as a method of distribution. There are many parents who do not have access to computers, and the LEA would be excluding them from receiving information related to their children’s education. It would be appropriate, however, for the LEA to distribute announcements of web postings that include a statement that a hard copy is available on request, either to the individual directly or in publicly available locations (which the LEA would specify). The LEA should not require a parent to come to the superintendent’s or principal’s office to request or view documents, as that could be intimidating to some parents. However, the campus can make the document available at public places and at the school’s front office. In the event that the document(s) are being made available to parents via a website, the LEA and/or campus would need to have documentation showing evidence that all parents were advised how to access such document(s) (i.e., student handbook notice, letter, publication, etc.).

**Question 12: Do you have a copy of a compliant PFE policy we could look at?**

Answer 12: There is a [PFE policy toolkit](#) available on the [Title I, Part A Statewide Parent and Family Engagement Initiative’s website](#) that includes information and resources related to the PFE policy requirements.

**Question 13: If we only have to develop a Supplement, Not Supplant (SNS) methodology for elementary, do we need to keep a statement of exemption on file for middle schools and high school?**

Answer 13: It is not necessary to have both documents. If the LEA is only required to have an SNS Methodology for its Elementary schools because its middle schools and high school can be excluded for one of the reasons described in this presentation, best practice would be for the LEA to start its methodology by explaining that it only applies to its elementary schools because its middle schools and high schools can be excluded. That way, it is clear to everyone (the LEA staff and the auditors) that all the campuses in the LEA have been accounted for.

**Question 14: Do alternative education campuses (AEP) that serve all grade levels count for the SNS statement of exemption?**

Answer 14: It depends. If the LEA has listed the alternative education campus on the SC5000 (in the Consolidated Federal Grant Application on eGrants) as having an enrollment other than zero—meaning that students are actually coded to the AEP for accountability purposes—then the AEP would need to be included in the methodology. The LEA would determine in which one of the three campus categories would be most appropriate to put the AEP, based on the grade levels of the students enrolled. The LEA would treat it like any other campus when making determinations about whether any of its campus categories can be excluded.

If the AEP has an enrollment of zero on the SC5000—meaning that all the students at the AEP are coded back to their home campus for accountability purposes—the LEA would not consider the AEP campus in its exemption determinations.

**Question 15: When will validation requests go out for 2023?**

Answer 15: Random Validation notifications for the 2023-2024 school year will probably be made in October and November 2023.

**Question 16: You mentioned that that description for the CNA did not include meeting notes. Are you suggesting that meeting notes need to be included in the CIP?**

Answer 16: Not at all. I think there was some confusion here. Multiple items were requested in the validations for both the CNA and the CIP. Item 1.1 for the CNA validation was the description of the CNA process. The description should include the meeting dates, the list of stakeholders (with roles), the list of areas to be examined, and a list of the data sources used. The supporting documentation that we requested consisted of Items 1.2 (meeting agenda), 1.3 (meeting minutes or notes), and 1.4 (sign-in sheet or participant roster) for one CNA meeting. We wanted to see evidence that the LEA was following the process described in Item 1.1.

Likewise, Item 1.1 for the CIP validation was a list of the stakeholders (with roles) that were involved in the development, review, and revision of the Schoolwide Program Plan. The supporting documentation that we requested consisted of Items 1.2 (meeting agenda), 1.3 (meeting minutes or notes), and 1.4 (sign-in sheet or participant roster) for one CIP meeting. We wanted to see evidence that the stakeholders listed in Item 1.1 were involved in the campus's CIP review and revision process.

**Question 17: [This question is a follow-up to Q16] It was on the document that you said you felt was created specifically for the validation. It was the description of the CNA process, but you said there were not meeting notes.**

Answer 17: On the documentation submitted, the LEA had clearly marked Item 1.2 (the Agenda) and Item 1.4 (the Sign-in Sheet). There were other pages submitted that were marked as Item 1.3 (Meeting Notes), so we did not consider the notes made on the submitted copy of the Agenda to be the documentation the LEA intended as meeting notes. For purposes of the example we were discussing in the presentation, we did not include a discussion of the documentation the LEA had submitted for Item 1.3

**Question 18: Is it in statute that CNA process must take more than one meeting?**

Answer 18: Statute does not specify that the CNA process must take more than one meeting. However, the Comprehensive Needs Assessment is supposed to be **comprehensive**. It should be a process, not an event. The work involved in reviewing the data necessary to conduct a comprehensive needs assessment is more than can be accomplished in a single meeting. It is possible that the campus

may have much of this preliminary work done by various subcommittees and then have a single meeting to discuss the results of the subcommittee work and prioritize the campus's needs. If that is the case, that process would be part of the CNA description.

**Question 19: CIP Stakeholders - Who are considered “paraprofessionals in the school”?**

Answer 19: Paraprofessionals would be the instructional aides who might be working in the school.

**Question 20: Is there a template for a Statement of Exemption?**

Answer 20: Yes, there are templates for both the Statement of Exemption and the SNS Methodology in the [Supplement, Not Supplant Handbook](#).

**Question 21: Isn't the PFE Policy really a Plan and not a Board Adopted policy? Or is it to be treated like a true policy that gets Board approval?**

Answer 21: The statute calls it a policy. How the LEA treats it in terms of whether board approval is required depends on the LEA's policies and procedures.

**Question 22: In a small district, can our PFE policy be districtwide? Our compacts look different based on campus needs.**

Answer 22: In a very small district, such as an LEA that has only one campus, it is possible for the PFE policies for the LEA and the campus to be incorporated into a single document. However, the required elements are different for the LEA and for the campus. The LEA must ensure that the requirements for both the LEA and the campus are included in the single document.

An LEA that has only one elementary, one middle school, and one high school could also conceivably have a single PFE policy document, but in that case, the required elements for each individual campus policy would be addressed in a separate section. It may be easier in an LEA of this size to have separate documents.

It is not permissible for an LEA with multiple elementary schools (for example) to group all the LEA's elementary schools into a general “elementary school policy.” The policies must be specific to each campus, whether part of the same document or not.

**Question 23: Follow-up on the PFE Policy — if we treat it like a plan and do not require Board approval, where do we document that?**

Answer 23: The LEA should have written procedures indicating what types of items the LEA takes to its Board for approval.

**Question 24: PFE Policy vs Parent Involvement Policy. We should have 2 separate policies?**

Answer 24: “PFE policy” and “Parent Involvement Policy” are used interchangeably. The two types of PFE policies that statute refers to are the LEA’s PFE policy and the campus’s PFE policy. Each type has its own requirements listed in statute. The [PFE policy toolkit](#) that is available on the [Title I, Part A Statewide Parent and Family Engagement Initiative’s website](#) can assist LEAs and campuses in ensuring that each set of requirements is met.