

# Title I, Part A Random Validations: Common Issues



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### **Attendance Survey**



Date: 05/09/2023

Training Topic: Title I, Part A

Enter First Name, Last Name, E-mail.

Select Region and LEA.

**Indicate Position Title** 

https://tea.co1.qualtrics.com/jfe/form/SV 71HkHxtHBzjhbNk



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- Background
- Current-year Validations for Title I, Part A
  - Numbers
  - Description of Comprehensive Needs Assessment Process
  - Required Stakeholders for Schoolwide Program Plan
  - Campus Written PFE Policy
  - SNS Methodology or Statement of Exemption



## Background



# Title I, Part A 2020-2021 Random Validation Requirements & Results

- 2 Requirements Reviewed per LEA
- # of LEAs/Campuses = 20
- % Met Requirement (#) = 60% (12)



# Title I, Part A 2020-2021 Random Validation Requirements & Results

- Schoolwide Program Campus Comprehensive Needs Assessment (CNA)
  - 65% (13) Met Requirement
  - 35% (7) Improvement Needed

- Campus Written Parent and Family Engagement (PFE) Policy Method of Distribution and Language
  - 75% (15) Met Requirement
  - 25% (5) Improvement Needed



# Title I, Part A 2020-2021 Random Validation Requirements & Results

- Resubmission in 2021-2022: Schoolwide Program Campus Comprehensive Needs Assessment (CNA)
  - 86% (6) Met Requirement
  - 14% (1) Improvement Needed

- Resubmission in 2021-2022: Campus Written Parent and Family Engagement (PFE) Policy Method of Distribution and Language
  - 80% (4) Met Requirement
  - 20% (1) Improvement Needed



# Title I, Part A 2021-2022 Random Validation Requirements & Results

- 3 Requirements Reviewed/1 Requirement per LEA
- # of LEAs/Campuses = 57
- % Met Requirement (#) = 75% (43)



# Title I, Part A 2021-2022 Random Validation Requirements & Results

- Schoolwide Program Campus Comprehensive Needs Assessment (CNA)
  - 83% (10) Met Requirement
  - 17% (2) Improvement Needed
- Schoolwide Program Plan/Campus Improvement Plan (CIP) Stakeholders
  - 96% (22) Met Requirement
  - 4% (1) Improvement Needed
- Campus Written Parent and Family Engagement (PFE) Policy Method of Distribution and Language
  - 50% (11) Met Requirement
  - 50% (11) Improvement Needed



# Title I, Part A 2021-2022 Random Validation Requirements & Results

- Resubmission in 2022-2023: Schoolwide Program Campus Comprehensive Needs Assessment (CNA)
  - 50% (1) Met Requirement
  - 50% (1) Improvement Needed
- Resubmission in 2022-2023: Schoolwide Program Plan/Campus Improvement Plan (CIP) Stakeholders
  - 100% (1) Met Requirement
  - 0% (0) Improvement Needed
- Resubmission in 2022-2023: Campus Written Parent and Family Engagement (PFE)
   Policy Method of Distribution and Language
  - 73% (8) Met Requirement
  - 27% (3) Improvement Needed



## **Current-Year Validations**



# Title I, Part A 2022-2023 Random Validation Requirements

- 3 Requirements Reviewed/1 Requirement per LEA
- # of LEAs/Campuses = 60

- Campus Written PFE Policy 36 LEAs
- Schoolwide Program Campus CNA 12 LEAs
- Schoolwide Program Campus Plan/CIP 12 LEAs



# Title I, Part A 2022-2023 Overall Program Results

Met Requirement = 82% (49)

Improvement Needed = 18% (11)





# Title I, Part A 2022-2023 Results by Program Requirement

- Schoolwide Comprehensive Needs Assessment
  - 92% (11) Met Requirement
  - 8% (1) Improvement Needed
- Schoolwide Program Plan Stakeholders
  - 92% (11) Met Requirement
  - 8% (1) Improvement Needed
- Campus Written PFE Policy
  - 75% (27) Met Requirement
  - 25% (9) Improvement Needed



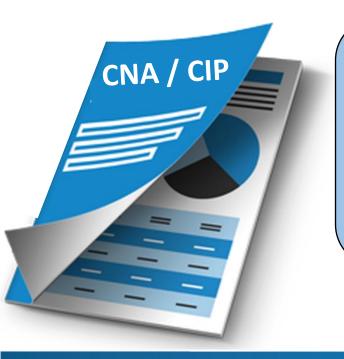


## **SW Campus Comprehensive Needs Assessment (CNA)**

#### **Documentation Required – CNA Item 1.1**

Description of the campus's comprehensive needs assessment (CNA) process





#### **Acceptable Documentation**

The relevant page(s) of the Comprehensive Needs

Assessment or Campus Improvement Plan that include the description of the campus's comprehensive needs assessment (CNA) process for the current school year







## SW Campus Comprehensive Needs Assessment (CNA)

#### **Documentation Required - CNA Item 1.1**

Description of the campus's comprehensive needs assessment (CNA) process





### Issues that may result in an "Improvement Needed" status

- Auditable documentation requested was not submitted
- CNA summary did not have all the required components
- Documentation from a prior year was submitted instead of current year documentation



## Meeting Documentation Required

### Documentation Required - CNA Items 1.2, 1.3, and 1.4

Meeting agenda, meeting notes or minutes, and participant roster for **one meeting** documenting the campus's CNA process





#### **Documentation Requirements**

- It is highly unlikely that a CNA process would take place in one meeting considering that the process should be comprehensive in nature. Therefore, an LEA should maintain documentation from multiple meetings to establish compliance. However, documentation from only **one meeting** is requested for this validation.
- The documentation submitted should provide evidence that the CNA process described in the CNA description referenced in Item 1.1 was followed.



## **TEM** CNA Meeting Documentation Required

#### Documentation Required - CNA Items 1.2, 1.3, 1.4

Meeting agenda, meeting notes or minutes, and participant rosters documenting the campus's CNA process





#### Issues that may result in an "Improvement Needed" status

- Auditable documentation requested was not submitted
- Documentation submitted does not reference the CNA process
- Documentation submitted does not align to the CNA Item 1.1 documentation
- Documentation from a prior year was submitted instead of current-year documentation



### ??? CNA Description ???

DESCRIPTION OF THE	INTERMEDIATE CNA PROCESS

The campus principal scheduled a Campus Site-Based Committee meeting on May 26th, 2022 and invited all members to the meeting.

At the meeting, the committee began its comprehensive needs assessment process as reflected on the agenda for the meeting. The committee reviewed all data available including parent, student, and teacher survey results, benchmark data, discipline reports, demographic reports, attendance reports, program evaluations from prior years, etc. The committee, using the data presented, analyzed the following areas using questions from TEA publications:

Demographics
Student Achievement
School Culture and Climate
Staff Quality, Recruitment and Retention
Curriculum, Instruction and Assessment
Family and Community Involvement
School Context and Organization
Technology.

From this analysis, the committee determined strengths and weaknesses in the instructional program and established campus priorities based on needs.

The committee also reviewed and updated the Campus Improvement Plan according to these new findings.

Throughout the year, the principal invited all committee members to meet again in October 2022 to discuss progress on reviewed and updated plans and then invited them again for a meeting in May of 2023 to see if any new assessment surveys improved based on adjustments made by the committee. Updates continued to the CNA and the CIP after receiving various new data including the Beginning-of-Year STAAR benchmark results. Updated CIP strategies will be implemented accordingly. An end-of-year evaluation will be conducted on strategies to determine effectiveness.

Excerpt from documentation submitted for CNA description requirement.



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Demographics Student Achievement School Culture and Climate Staff Quality, Recruitment and Retention Curriculum, Instruction and Assessment Family and Community Involvement School Context and Organization Technology.

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Excerpt from documentation submitted for CNA description requirement.



### **Non-Compliant Example**

DESCRIPTION OF THE	INTERMEDIATE CNA PROCESS

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Excerpt from documentation submitted for CNA description requirement.

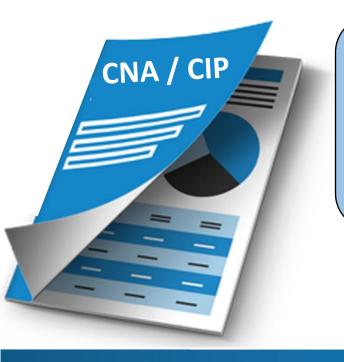
- Stakeholders not listed.
- Seems to be "created" for validation.



#### **Documentation Required – CIP Item 1.1**

Relevant page(s) of the current school year's Campus Improvement Plan (CIP) that include a list of stakeholders involved in the development of the plan





#### **Acceptable Documentation**

The stakeholder listing shall include the individuals by name and the stakeholder group/role\* that each individual represents.

\*Parents may not be LEA employees in order to fill the "parent" roles on the committee. [Texas Education Code §11.251]



#### Developed with the involvement of

- Parents;
- Other members of the community to be served;
- Individuals who will carry out such plan, including
  - Teachers.
  - Principals,
  - Other school leaders, and
  - Paraprofessionals present in the school;
- Administrators (including administrators of programs described in other parts of this title: Title I, Part C; Title I, Part D);
- The local educational agency, to the extent feasible
- Tribes and tribal organizations present in the community;
- If appropriate,
  - specialized instructional support personnel,
  - technical assistance providers, and
  - school staff:
  - If the plan relates to a secondary school, students; and
  - Other individuals determined by the school

Statute language includes plural references which means that there would need to be more than 1 stakeholder involved for the groups referenced.



#### **Documentation Required – CIP Item 1.1**

Relevant page(s) of the current school year's Campus Improvement Plan (CIP) that include a list of stakeholders involved in the development of the plan





#### Issues that may result in an "Improvement Needed" status

- Auditable documentation requested was not submitted
- Documentation submitted does not include the individuals by name
- Documentation submitted does not include the stakeholder roles for each of the individuals listed
- Documentation from a prior year was submitted instead of current year documentation



#### Documentation Required – CIP Items 1.2, 1.3, and 1.4

Meeting agenda, meeting notes or minutes, and participant rosters/sign-in sheets for one meeting held during the campus planning process documenting the involvement of the statutorily required stakeholders in the development of the schoolwide program plan





#### **Documentation Requirements**

- Although, it is highly unlikely that the CIP development process would take place in one meeting considering that the process should be comprehensive in nature, we are only requesting documentation for one meeting.
- The documentation submitted (meeting agenda, meeting notes or minutes, and participant rosters/sign-in sheets) should provide evidence that the CIP stakeholders listed in the documentation referenced in CIP Item 1.1 were involved in the CIP development process.



#### Documentation Required - CIP Items 1.2, 1.3, and 1.4

Meeting agenda, meeting notes or minutes, and participant rosters/sign-in sheets for one meeting held during the campus planning process documenting the involvement of the statutory required stakeholders in the development of the schoolwide program plan



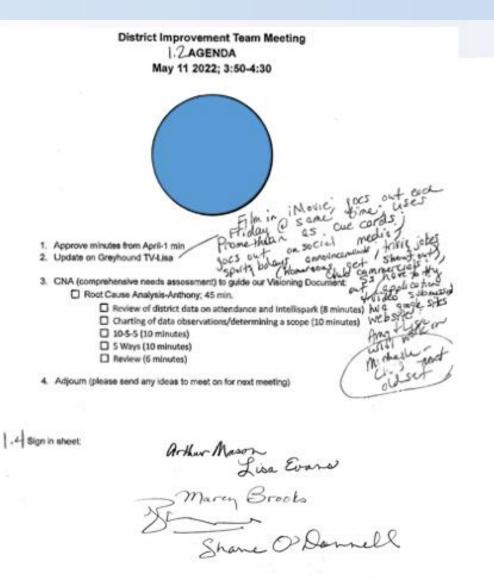


#### Issues that may result in an "Improvement Needed" status

- Auditable documentation requested was not submitted.
- Documentation submitted does not reference the CIP development process.
- Documentation submitted does not align to the list of stakeholders referenced in CIP Item 1.1 documentation.
- Documentation from a prior year was submitted instead of current-year documentation.



### ??? CIP Stakeholders ???



Excerpt from documentation submitted for SW Program Plan/CIP Stakeholder requirement.



### **Non-Compliant Example**

District Improvement Team Meeting 1.2.AGENDA May 11 2022; 3:50-4:30 Approve minutes from April-1 min 2. Update on Greyhound TV-Lisa Root Cause Analysis-Anthony: 45 min Review of district data on attendance and Intellispark (8 minutes) □ Charting of data observations/determining a scope (10 minutes) ☐ 10-5-5 (10 minutes) 5 Ways (10 minutes) Review (6 minutes) 4. Adjourn (please send any ideas to meet on for next meeting) 4 Sign in sheet

Excerpt from documentation submitted for SW Program Plan/CIP Stakeholder requirement.

- No roles on sign-in.
- Not all names match list of team members in plan.
- Only one parent on list.
- Parent not in attendance.



## Campus Written PFE Policy

#### **Documentation Required - PFE Item 1.1**

Campus Written Parent and Family Engagement (PFE) policy





#### **Acceptable Documentation**

The relevant page(s) of the current school year Campus Written Parent and Family Engagement (PFE) Policy that references the description of the method(s) of policy distribution and the language(s) in which the policy was distributed to parents and family members of participating students.



## **TEA** Campus Written PFE Policy

#### **Documentation Required – PFE Item 1.1**

Campus Written Parent and Family Engagement (PFE) policy





#### Issues that may result in an "Improvement Needed" status

- Auditable documentation was not submitted
- No reference to a method of distribution written in the policy
- No reference to the languages in which the policy was distributed
- Documentation submitted does not meet the statutory requirements for the campus written policy



## **TEA** Campus Written PFE Policy

#### **Documentation Required – PFE Item 1.2**

Evidence of policy distribution to parents and family members of participating students





#### **Acceptable Documentation**

- The relevant page(s) of the evidence of policy distribution to parents and family members of participating students
- The LEA must submit current school year documentation for only **ONE** method (as identified in the policy) utilized to distribute the campus written PFE policy to parents and family members of participating students.



### **TEM** PFE Item 1.2 Acceptable Documentation Examples

### Submit current school year documentation for only **ONE** method

#### **Student Handbook**

Relevant pages of the student handbook that include the campus written PFE policy

#### **Campus Website**

Printout of the campus website where the most current policy is posted and the link to access the document

#### E-mail

Copy of email that was sent out that includes the email header (To, From, CC, Subject, Attachments) or the documentation that is required to be maintained as per local policies and procedures

#### **Newspaper Publication**

Newspaper clipping or printout referencing the policy being published in a newspaper

#### **Direct Mail**

Copy of the letter accompanying the policy distributed to parents via direct mail or the documentation that is required to be maintained as per local policies and procedures

**Student Registration** Distribution, Beginning of School Year Distribution, Parent-Teacher Conference Distribution

Documentation that is required to be maintained as per local policies and procedures



## **TEA** Campus Written PFE Policy

#### **Documentation Required – PFE Item 1.2**

Evidence of policy distribution to parents and family members of participating students





#### Issues that may result in an "Improvement Needed" status

- Auditable documentation was not submitted
- Documentation submitted does not align to the method of distribution and language described in PFE Item 1.1 documentation
- Documentation from a prior year was submitted instead of current year documentation
- Web link is broken (if campus website is the method of distribution)



### ??? PFE Policy ???

#### Parent and Family Engagement (All Grade Levels)

#### **Working Together**

Experience and research tell us that a child succeeds in education with good communication and a strong partnership between home and school. A parent's involvement and engagement in this partnership may include:

- Encouraging your child to put a high priority on education and working with your child every day to make the most of the educational opportunities the school provides.
- Ensuring that your child completes all homework assignments and special projects and comes to school each day prepared, rested, and ready to learn.
- Becoming familiar with all your child's school activities and with the academic programs, including special programs, offered in the district.
- Discussing with the school counselor or principal any questions you may have about the options and opportunities available to your child.
- Reviewing the requirements and options for graduation with your child in middle school and again while your child is enrolled in high school.
- Monitoring your child's academic progress and contacting teachers as needed. [See Academic Counseling on page.]
- Attending scheduled conferences and requesting additional conferences as needed. To
  schedule a telephone or in-person conference with a teacher, school counselor, or principal,
  please call the school office at for an appointment. The teacher will usually
  return your call or meet with you during his or her conference period or before or after
  school. [See Report Cards/Progress Reports and Conferences on page.]
- Becoming a school volunteer. [See Volunteers on page and policy GKG for more information.]
- Participating in campus parent organizations. Parent organizations include: Activity Booster Clubs

- Excerpt from a Student Handbook submitted as a campus PFE policy
  - NOT a policy
  - Does NOT address campus PFE requirements



#### **Non-compliant Example**

#### Parent and Family Engagement (All Grade Levels)

#### **Working Together**

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- Excerpt from a Student Handbook submitted as a campus PFE policy
  - NOT a policy
  - Does NOT address campus PFE requirements



1.1

#### ??? PFE Policy ???

#### PART 1. GENERAL EXPECTATIONS

The school agrees to implement the following statutory requirements:

- The school will jointly develop with parents, distribute to parents of participating children, a School Parent & Family Engagement Policy that the school and parents of participating children agree on.
- The school will notify parents about the School Parent & Family Engagement Policy by
  posting it on the district's website in both English and Spanish. The policy can also be
  printed in either language upon request.
- The school will periodically update the School Parent & Family Engagement Policy to meet the changing needs of parents and the school.
- The school will adopt the school's school-parent compact as a component of its School Parent & Family Engagement Policy.
- The school agrees to be governed by the following statutory definition of parental involvement, and will carry out programs, activities and procedures in accordance with this definition:

Parental involvement means the participation of parents in regular, two-way, and meaningful communication involving student academic learning and other school activities, including ensuring —

- (A) Parents play an integral role in assisting their child's learning:
- (B) Parents are encouraged to be actively involved in their child's education at school;
- (C) That parents are full partners in their child's education and are included, as appropriate, in decision-making and on advisory committees to assist in the education of their child;
- (D) The carrying out of other activities, such as those described in section 1118 of the ESEA.

Excerpt from a PFE policy submitted for 2022-23



1.1

#### **Non-compliant Example**

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- The school will jointly develop with parents, distribute to parents of participating children, a School Parent & Family Engagement Policy that the school and parents of participating children agree on.
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- (B) Parents are encouraged to be actively involved in their child's education at school;
- (C) That parents are full partners in their child's education and are included, as appropriate, in decision-making and on advisory committees to assist in the education of their child;
- (D) The carrying out of other activities, such as those described in section 1118 of the ESEA.

- Excerpt from a PFE policy submitted for 2022-23:
  - Cites section 1118 of ESEA. That's from NCLB, not ESSA.



## Title I, Part A—SNS

#### **Documentation** Required for Item 1.1

Evidence of Methodology, or Exemption

#### **Acceptable Documentation**

- Copy of SNS Methodology\*
  - --Is the methodology Title I-neutral?
  - -- Does it describe how State/local funds are allocated to campuses?

#### OR

- Copy of Statement of Exemption\*
  - --Is the LEA eligible for an exemption?

\*Sample templates are available in the SNS Handbook



## TEM Title I, Part A—Supplement, Not Supplant

#### **Documentation Required – Item 1.1**

Valid methodology or valid statement of exemption





#### Issues that may result in an "Improvement Needed" status

- Auditable documentation requested was not submitted.
- Methodology is not Title I-neutral.
- Not all campuses accounted for.
- Exemption is not valid.
- Documentation from a prior year was submitted instead of current-year documentation.



## Title I, Part A—Supplement, Not Supplant

#### **Documentation Required – Item 1.2**

Summary pages from general ledger showing state/local funds budgeted to campuses.





#### Issues that may result in an "Improvement Needed" status

- Auditable documentation requested was not submitted.
- Campus names/numbers and their corresponding state/local budget totals are not evident.
- Budgeted amounts not related to methodology submitted.
- Documentation from a prior year was submitted instead of current-year documentation.



## Who Qualifies for Statement of Exemption?

# An LEA qualifies for a Statement of Exemption in the following situations:

- The LEA only has a single campus (only one school in the district); or
- All the campuses in the LEA are Title I, Part A campuses; or
- The LEA has only one campus per campus category (Elementary, Middle School, High School); or
- All campus categories can be excluded.

#### SNS Handbook, Pages 11-12



SUPPLEMENT, NOT SUPPLANT
HANDBOOK

A GUIDE FOR GRANTS ADMINISTERED BY THE
TEXAS EDUCATION AGENCY



## Exemptions



## **TEA** Expansion of Exemptions

#### Who Qualifies for Statement of Exemption?

- Single Campus in LEA
- Single Campus per Category
- LEA with All Title I, Part A Campuses



## TEA Single Campus in LEA

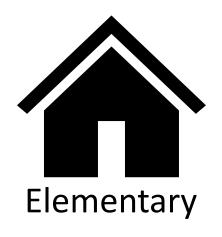
An LEA that has only one campus is exempt from the SNS Methodology requirement.





### **Single Campus per Category**

An LEA that has only one campus per campus category (with no duplication of grades) is exempt from the SNS Methodology requirement.



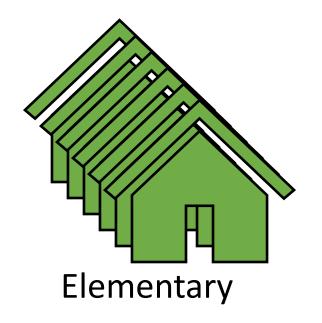


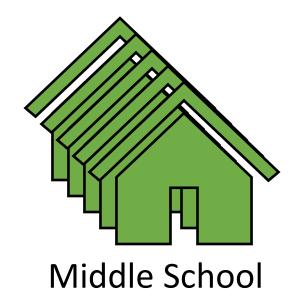




## TEA LEA with All Title I, Part A Campuses

An LEA with all Title I, Part A campuses is exempt from the SNS Methodology requirement.









## Campus Category Exemptions

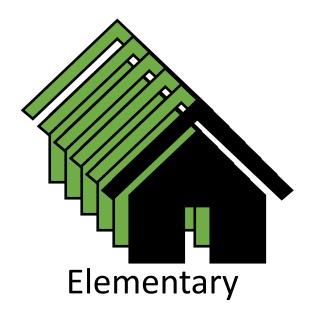
Exempting an entire category of campus can simplify the LEA's methodology, or may qualify LEA for Statement of Exemption.

- Single campus
- All non-Title I campuses
- All Title I campuses



## Single Campus in Category

Campus category with only one campus can be excluded from SNS Methodology.





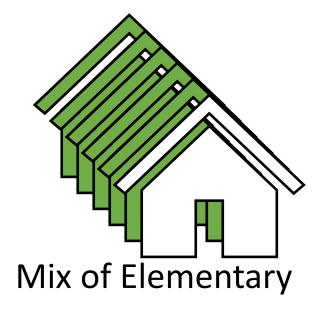




- Campus category that has:
  - All non-Title I campuses



- Campus category that has:
  - All non-Title I campuses

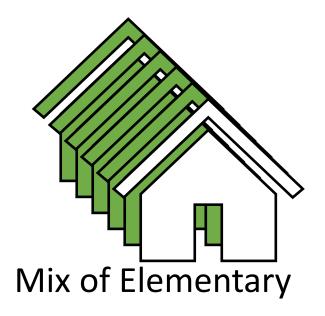




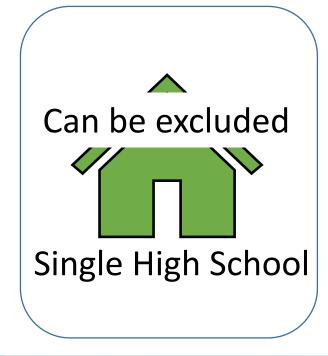




- Campus category that has:
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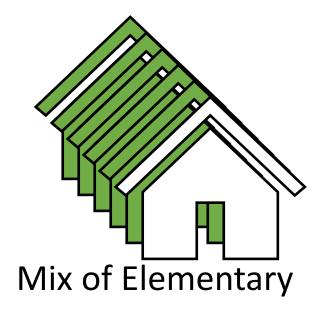




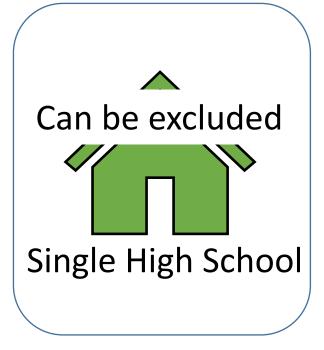


#### Campus category that has:

All non-Title I campuses

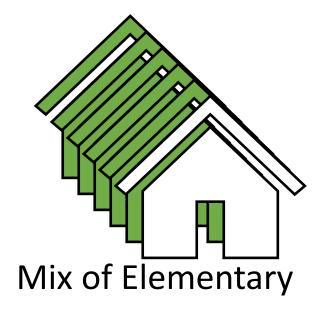




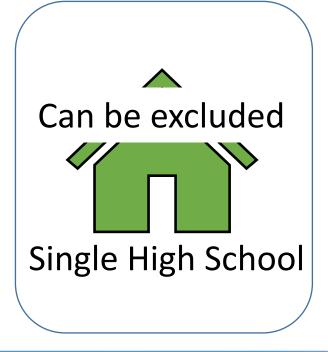




In this case, SNS Methodology required for Elementary category only.



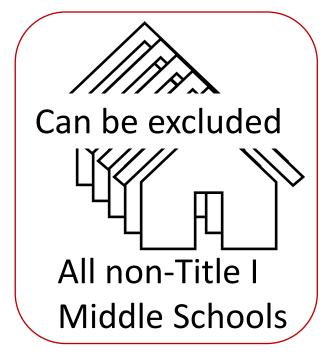


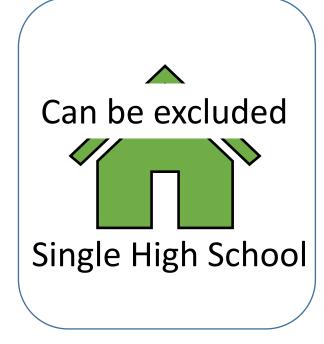




- Campus category that has:
  - All Title I campuses





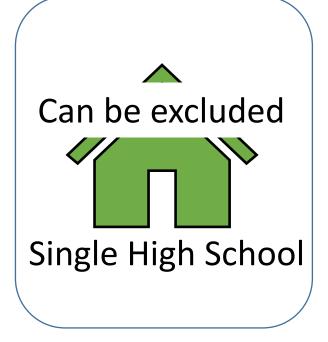




In this case, all campuses are excluded, and the LEA does a Statement of Exemption.





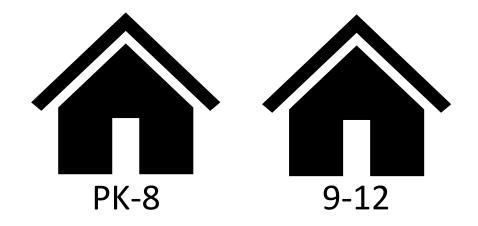




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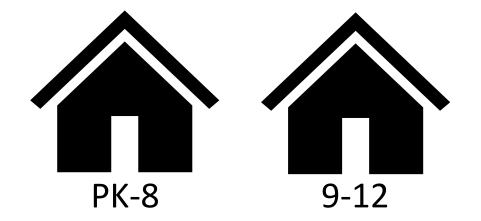


#### Exempt or Not Exempt?





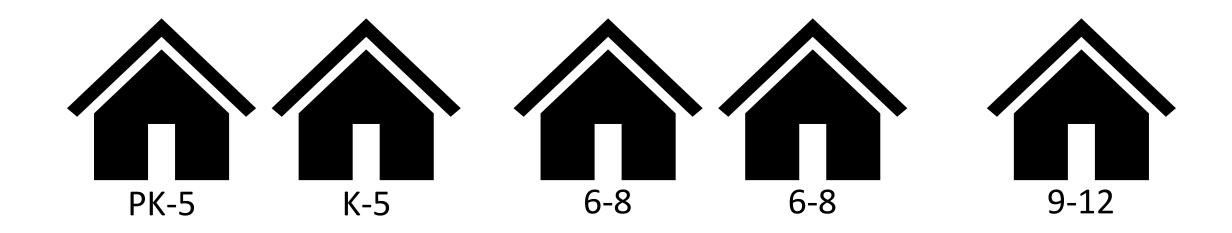
#### Exempt or Not Exempt?



Single campus per campus category and no duplication of grades = LEA exempt



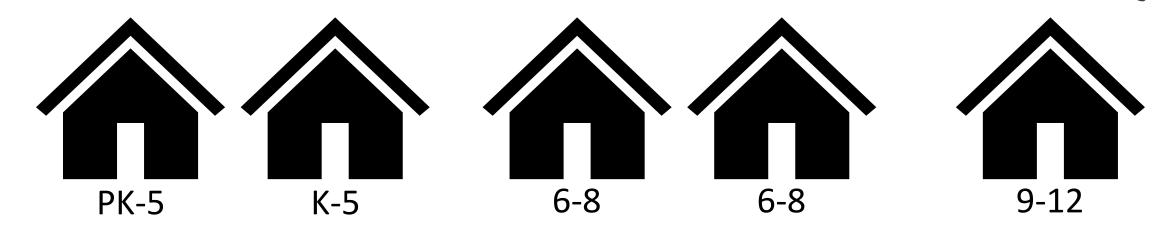
#### Exempt or Not Exempt?





Exempt or Not Exempt?

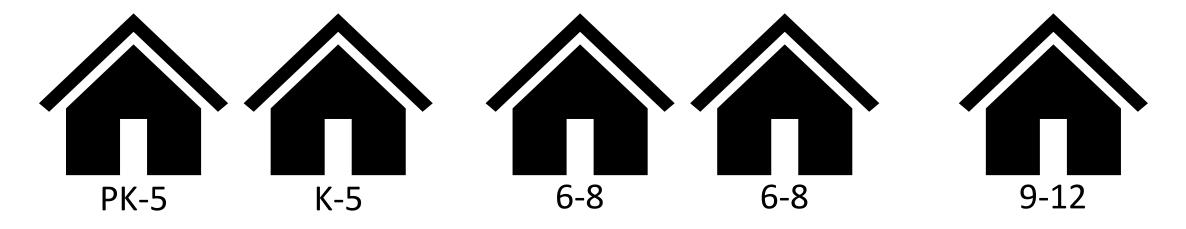






**Exempt or Not Exempt?** 

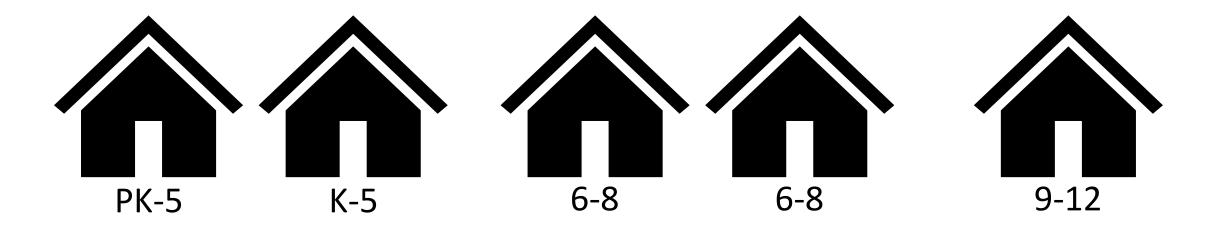




Need more info...



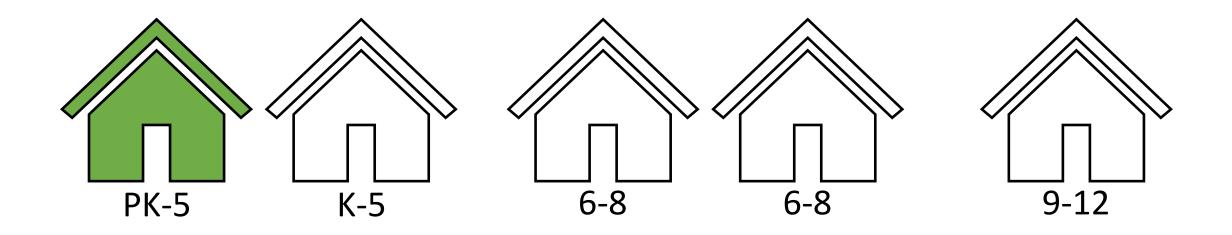
#### Exempt or Not Exempt?



## Which campuses are Title 1?

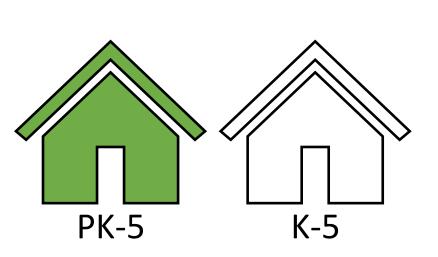


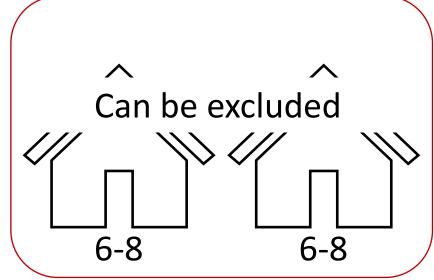
#### Exempt or Not Exempt?



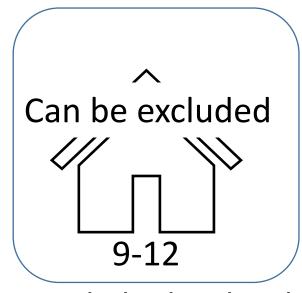


#### Exempt or Not Exempt?





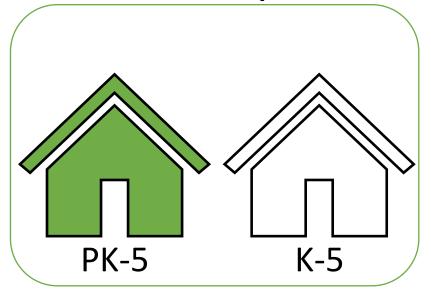
All non-Title I middle schools



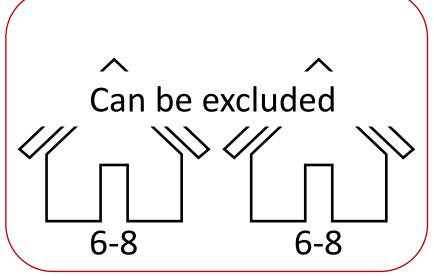
Single high school



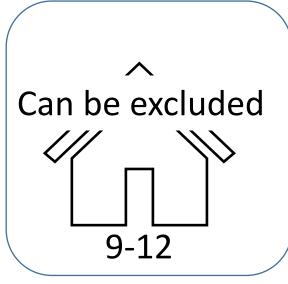
#### Exempt or Not Exempt?



Mix of elementary



All non-Title I middle schools

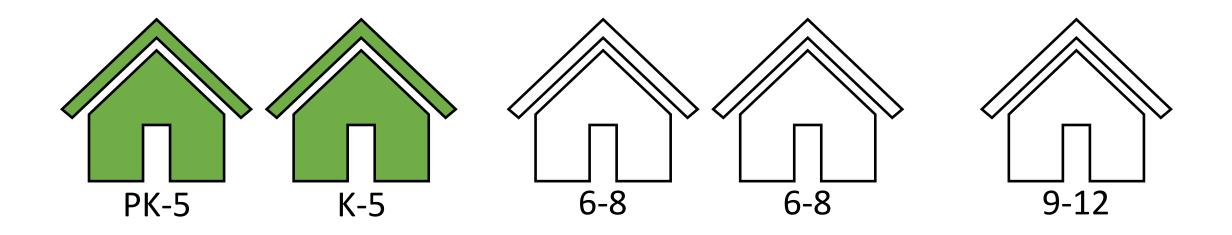


Single high school

Not Exempt: LEA needs SNS methodology for elementary schools.

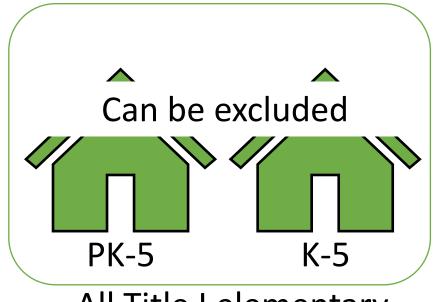


#### Exempt or Not Exempt?

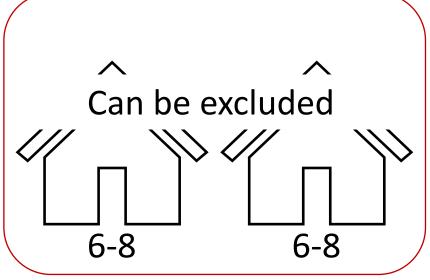




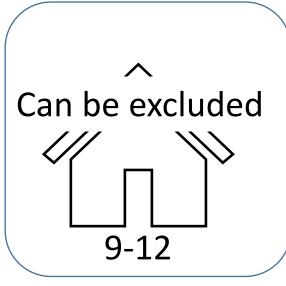
#### Exempt or Not Exempt?



All Title I elementary



All non-Title I middle schools



Single high school

Exempt: All categories can be excluded, so LEA is Exempt.

#### **Regional Education Service Centers**







#### **Contact Information**

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512-463-9499



#### **Evaluation Survey**



Date: **05/09/2023** 

Training Topic: Title I, Part A

Indicate level of agreement/disagreement with statements

Provide feedback

https://tea.co1.qualtrics.com/jfe/form/SV 5p9RuuV4bR4nRf8