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# Monitoring of ESEA Consolidated Programs

School Year: 2019-20

– Guidance Document for LEAs –



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(This document can also be found on the Department of Public Instruction's website at: <http://esea.dpi.wi.gov/files/esea/pdf/monitoring-guidance.pdf>)

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## Monitoring Overview

The Department of Public Instruction (DPI) has oversight and monitoring responsibilities to review compliance within the Federal Elementary and Secondary Education Act (ESEA) consolidated programs, including Title I, Part A; Title II, Part A; Title III, Part A; and Title IV, Part A. The oversight and monitoring process includes an extensive review and approval process for all ESEA consolidated applications submitted by school LEAs/consortia. In addition, this process includes a desk review of materials and an on-site visit. This document is designed to provide guidance to LEAs on the required documentation and expectations during the desk and on-site review process. The monitoring process is a review of programming and implementation, including fiscal components of the consolidated ESEA requirements and individual Title requirements.

It is important that LEA personnel participating in the ESEA programs participate in gathering and uploading required documentation, as well as speak in depth to the programs monitored during the on-site visit. The ESEA Coordinator and the individual program coordinators responsible for program implementation must be present for the on-site visit as DPI staff will engage them in the interview process. It is also recommended that the LEA business manager be available for interviews if determined necessary by the on-site review team.

DPI annually determines which LEAs are monitored for ESEA consolidated requirements, based on multiple criteria: combined allocations for all ESEA grants; monitoring history; history of past audit findings; reports of fraud; and history of late application and late report submission.

## Monitoring Process

DPI will monitor LEAs and consortia of varying size and programmatic responsibilities. A one-day monitoring review will be held at the office of selected LEAs. Small teams of DPI staff will conduct the reviews. LEA/consortia will receive notification at least two months in advance of their scheduled visit, including logistical information, an agenda, and this monitoring guidance document.

Monitoring reviews will cover broad or consolidated requirements—that is, common requirements across all Titles—as well as requirements specific to individual Title programs. The reviews are neither intended to be exhaustive nor to ensure compliance with each and every requirement within the law. Rather, they are to verify compliance with items required under ESEA Consolidated Program funding and major program requirements within Title I, Part A; Title II, Part A; Title III, Part A; and Title IV, Part A. *Note – only Titles under which the LEA/consortium receives funds will be reviewed.*

# Overview

DPI program staff will be verifying that the LEA/consortium met the following general requirements:

If an <b>Individual LEA</b> is Monitored	If a <b>Consortium</b> is Monitored
1) Local Needs	1) Consortium Needs
2) Professional Development Plan	2) Private School Equitable Participation
3) Private School Equitable Participation	3) Written Plan
4) Parents' Right to Know Provisions	
5) Public Reporting Provisions	
6) Consultation with American Indian Nations	
7) Fiduciary Responsibilities	

The **Individual Program Requirements** review will cover the major requirements within Title I, Part A; Title II, Part A; Title III, Part A; and Title IV, Part A.

*Note - only Titles under which the LEA/consortium receives funds will be reviewed.*

**The monitoring reviews will be divided into two main parts:**

## 1. Document Collection/Desk Review

LEAs will submit all required documentation through the DPI ESEA Monitoring website. Each LEA will have its own site developed by DPI. The requirements are based upon the statute found in the last authorized version of ESEA. The LEA must demonstrate compliance by producing an artifact exactly as described in the required documentation. LEAs will have a minimum of four weeks to upload their documentation and up until five weeks prior to the scheduled visit to complete the submission. Prior to the visit, DPI staff will review the submitted documentation; contact the LEA if any documentation is missing or incomplete; and give the LEA the opportunity to submit the additional documentation for review, before DPI staff determines specific guiding questions for the on-site visit.

## 2. On-Site Visit

During the on-site visit, DPI staff will ask guiding questions on the different monitoring requirements. The purpose of the on-site visit is to gather additional information related to each of these requirements. Specifically, the on-site visit will address any questions that were unanswered from the initial required documentation collection. Also, DPI staff is always interested in highlighting promising practices in LEAs, and the on-site visit provides an opportunity for DPI to inquire about promising practices which can be shared with other LEAs. Since the on-site visit will be a follow-up to the document collection, DPI staff may not ask all of the guiding questions in this document.

## Report/Results:

Preliminary findings will be presented to LEAs/consortium leaders at the conclusion of the on-site visit. A formal written report will be sent to LEAs/consortium leaders within six weeks after the visit. The formal report will include strengths, weaknesses, any corrective action necessary, and offers of technical assistance, if needed.

## Staff Contacts ESEA Grant Programs

Updated: August 2019

Program	Name	Phone	E-mail
Title I, Part A - Improving the Academic Achievement of the Disadvantaged	To find the Title I, Part A Consultant for your district, go to <a href="https://dpi.wi.gov/title-i/consultant-directory">https://dpi.wi.gov/title-i/consultant-directory</a> .		
Title II, Part A - Teacher and Principal Training and Recruiting	Abdallah Bendada	608-267-9270	<a href="mailto:abdallah.bendada@dpi.wi.gov">abdallah.bendada@dpi.wi.gov</a>
Title III, Part A, Subpart 1 - English Language Acquisition and Language Enhancement	Audrey Lesondak	608-266-7292	<a href="mailto:audrey.lesondak@dpi.wi.gov">audrey.lesondak@dpi.wi.gov</a>
Title IV, Part A - Student Support and Academic Enrichment	Emily Holder	608-267-9170	<a href="mailto:emily.holder@dpi.wi.gov">emily.holder@dpi.wi.gov</a>

# Consolidated Requirements

## 1. Local Needs

**REQUIREMENT:** The LEA shall use student data, school data, educator data, and other indicators to review annually the progress of each school and identify needs. LEAs are required to address the learning needs of all students, including children with disabilities, English learners, and gifted and talented students, and should examine relevant data to understand students' and educators' most pressing needs, including the potential root causes of those needs given local context. Particular attention should be devoted to students who are failing or at risk of failing to meet the challenge of the college- and career-ready standards and any other factors as determined by the LEA.

*Section 1112(b)(1), ESEA Section 4624(a)(4), ESEA Section 4106(d), ESEA Section 2103(b)*

In order to have a successful needs assessment that is both needs-driven and context-specific, LEAs should examine student, school, educator, and stakeholder data when identifying local needs:

Stakeholders	Student Data	School Data	Educator Data
Educators Students Families Community	Demographics Achievement and Growth Graduation Rates	Resources Safety Climate	Effectiveness Retention Rates Areas of Expertise and Shortages Job Satisfaction

### Required Documentation:

#### 1.a. A synopsis of the local needs identified.

### Guiding Questions:

#### 1. Data

- What data sources are readily available (student, educator and student/staff/parent and community data?)
- If applicable, what data have been used to address well-rounded education, healthy and safe school environments, and effective use of technology?
- Describe the process used (including criteria, guidance and rubrics) to analyze and correlate data.
- How does the LEA use [continuous improvement processes](#) to identify the areas of improvement and capitalize on the areas of strength?

#### 2. Stakeholder Engagement

- Describe the process used to facilitate collaborative conversations among [stakeholders](#) to help identify areas of improvement?
- How is ongoing stakeholder engagement used to support and enhance the evaluation of progress and the continuous improvement process?

# Consolidated Requirements

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## 3. Determine Priorities

- How has the LEA engaged in a root cause analysis to identify priority needs?
- How are priority needs addressed to ensure equitable access to a better education for all students, specifically students of color, students experiencing poverty, students with IEPs, and English learners?

**REQUIREMENT:** Services funded with ESEA funds must be integrated and coordinated among ESEA Titles and with other federal, state, and local programs.

*Sections 1114 (a)(1); 1115(b)(2)(F); 1423(a)(9); 2103(b)(2)(F); 3115(a); 4110; and 8305(b)*

### Required Documentation:

- ✓ No additional materials required. The LEA submitted an ESSA LEA Plan and a grant application for each Title in which they received funds.

### Guiding Questions:

1. How does the LEA integrate and coordinate ESEA funds to accelerate growth and positive changes for learners most at risk?
2. Describe the process used to align the identified needs to the ESEA program objectives and activities?
3. If the LEA received Title V- Rural and Low-Income School (RLIS) funding, how did the LEA decide which programs to support with that funding?

**REQUIREMENT:** LEAs receiving a Title IV, Part A allocation over \$30,000 are required to complete a needs assessment every three years.

*Section 4106(d)(2-3)*

### Required Documentation:

- 1.b. A synopsis of data collected for each area of well-rounded education, healthy and safe school environments, and effective use of technology.
- 1.c. Synopsis of needs identified in each of the three areas of well-rounded education, healthy and safe school environments, and effective use of technology.

### Guiding Questions:

1. What needs assessment tools, if applicable, were used to identify needs in each of the areas?
2. Describe how funded activities align with the needs identified?

\* Unless otherwise noted, four digit section numbers refer to the Elementary and Secondary Education Act of 1965, as reauthorized by the *Every Student Succeeds Act, P. L. 115-224, Enacted December 10, 2015.*

# Consolidated Requirements

## 2. Professional Development Plan

**REQUIREMENT:** The LEA provides a description of professional development activities that will be made available to teachers, superintendents, principals, and paraprofessionals in order to increase student achievement and eliminate the achievement gap in core academic areas between low-income and minority students and their peers.

*Section 2103 (b)(E-P), Section 1114(b)(7)(A)(iii)(IV), Section 1115(b)(2)(D)*

### Required Documentation:

#### 2.a. A copy of the professional development plan that (all are required):

- includes a description of the opportunities offered to public and private school staff;
- includes strategies to address the needs of all students;
- aligns with the college- and career-ready standards and/or the Wisconsin Academic Standards;
- is founded on evidence-based research; and
- was developed by key stakeholders (teachers, principals, administrators, other appropriate school personnel, and parents of children in schools served, including parents of private school students.)

### Guiding Questions:

1. Describe the professional development opportunities provided to teachers, principals, school leaders, and other instructional staff that addressed the priorities identified in the needs assessment.
2. Describe the process used to ensure that all professional learning practices, interventions, and strategies meet the most relevant level of evidence-based instructional practices.  
Resources available at:  
[https://dpi.wi.gov/sites/default/files/imce/sspw/TSSGettingStarted\\_NIRN\\_HexagonTool.pdf](https://dpi.wi.gov/sites/default/files/imce/sspw/TSSGettingStarted_NIRN_HexagonTool.pdf) and  
<https://ccrs.osepideastthatwork.org/teachers-academic/evidence-based-practices-instruction>.
3. How does the professional learning for teachers, superintendents, principals, paraprofessionals, and other school leaders support the use of high quality instructional materials aligned to the college- and career-ready standards and/or the Wisconsin Academic Standards?
4. What actions are taken to ensure the needs are addressed for students with different learning styles, including students with special needs, gifted and talented students, and English learners?
5. Describe the process used to evaluate the outcomes of the professional development plan, and discuss the actions needed to fully address the priorities identified in the LEA's needs assessment.

# Consolidated Requirements

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## 3. Private School Equitable Participation

**REQUIREMENT:** The LEA engages in timely and meaningful consultation with all private schools in its area regarding funds available under ESEA to address the needs of the private school students and staff members.

*Section 1117(b), Section 8501(c)*

### Required Documentation:

- 3.a. Evidence (meeting agenda/minutes; letter; email; and/or telephone records) demonstrating that consultation between the LEA and private schools continued throughout the implementation and assessment of activities under ESEA.

### Guiding Questions:

1. How does the LEA ensure the initial consultation takes place before the LEA makes any decision that affects the opportunities of eligible private school children, teachers, and other educational personnel who participate in ESEA funded programs?
2. How does the LEA consult with the private school officials throughout the year?
3. If funds were transferred from Title II, Part A or Title IV, Part A to another ESEA program, how did the LEA consult with private schools before the transfer was made?
4. What progress monitoring assessments were used to determine student achievement, and how was the data used to improve instruction and services?

**REQUIREMENT:** The LEA shall provide eligible private school children, teachers, and other educational personnel, services that address their needs under ESEA and are equitable to the services provided to participating public school children, teachers, and other educational personnel.

*Section 1117(a), Section 8501(a)*

### Required Documentation:

- 3.b. A list of the multiple academic achievement measures used to determine the needs of eligible private school students.
- 3.c. A list of equitable services provided to private school students.
- 3.d. A list of equitable services provided to private school teachers and other personnel.

### Guiding Questions:

1. How does the LEA ensure equitable services are provided to private school students?
2. How does the LEA ensure that equitable services are provided to private school teachers and personnel?

# Consolidated Requirements

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**REQUIREMENT:** The LEA shall provide services that are secular, neutral, and non-ideological. *Section 1117(a)(2), Section 8501(a)(2), Section 8501(d)(2)(A) and (B), Section 1117(d)(2)(A) and (B)*

## Required Documentation:

- 3.e. A list of providers (either LEA staff or vendors) that served private school students and staff.
- 3.f. If there was a disagreement between the LEA and private school on the provision of services through a contract (vendor), a written description of the reasons will be provided.

## Guiding Questions:

- 1. How does the LEA supervise and evaluate ESEA funded services and programs for private school students and staff?
- 2. If applicable, describe any disagreement between the LEA and the private school(s) on the provision of services through a contract (vendor)?

# Consolidated Requirements

## 4. Parents' Right to Know Provisions

**REQUIREMENT:** The LEA has processes in place for the timely implementation of parents' right to know provisions in an understandable and uniform format, and to the extent practicable, in a language or format that parents can understand with regard to: professional qualifications of teachers and paraprofessionals; the level of academic achievement and academic growth on the state academic assessments; identification of a child as an English learner and their subsequent placement within a language instruction education program; and required written consent of mental health assessments for any student under the age of 18.

*Sections 1112(e)(1-3) and 4001(a)(1)*

### Required Documentation:

- 4.a. Communications developed in a timely manner for use in informing parents of their right to inquire, and for the district to provide information about whether the students' teachers have met state qualifications; are teaching under an emergency license or teaching out of their field; and if students are served by paraprofessionals, the qualifications of the paraprofessionals.
- 4.b. If applicable, communications developed to inform parents if their child has been taught by a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned for four or more consecutive weeks.
- 4.c. Communications developed to inform parents of each student's level of achievement on state academic assessments.
- 4.d. For students identified as English learners, procedures for identifying a student as an English learner; communications used to notify parents of the child's level of English proficiency, including how such level was assessed, and the status of the child's academic achievement; the methods of instruction used in the language instruction program; the process for exiting English learner designation; how such program will specifically help the child learn English and meet age-appropriate academic achievement standards for grade promotion and graduation; assessment and language-related accommodations the child is entitled to; in the case of a child with a disability, how such language instruction education program meets the objectives of the individualized education program of the child, as described in *section 614(d)* of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d)); and the right of a parent to immediately have their child removed from the program.
- 4.e. If applicable, the process used to obtain prior written, informed consent from the parent of each child who is under 18 years of age to participate in any mental-health assessment or service.
- 4.f. If applicable, communications provided to parents upon their request that pertain to any state or LEA policy regarding student participation in state assessments.

# Consolidated Requirements

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## Guiding Questions:

1. What systems are in place to ensure the parents' right to know provisions are recognized and effectively responded to? For example:
  - a. Describe the process to inform parents at the start of each school year, that they may request and receive information on the professional qualifications of teachers and paraprofessionals?
  - b. How does the LEA ensure every school provides information to each individual parent on the level of achievement of their child in each of the state academic assessments?
  - c. What process is used to ensure each school provides individual parents with timely notice that their child has been assigned, or taught for four or more consecutive weeks in a core academic subject, by a teacher who is not highly qualified? (Core academic subjects include: English, reading or language arts, math, science, history, civics and government, geography, economics, the arts, and foreign languages.)
  - d. What system is in place to identify a student as an English learner within the first 30 days or two weeks when a student enrolls after the start of school? How does the LEA ensure that parents are informed of their child's access to an effective language education program and associated rights?
  - e. How does the LEA ensure that a student is not admitted to, or excluded from, any federally assisted education program on the basis of a surname or language-minority status?
  - f. How does the LEA ensure regular communication with parents is in an understandable and uniform format and, to the extent practicable, in a language or format that the parent can understand, including notification to parents of their right to be actively involved in their child's education?
  - g. If applicable, how does the LEA ensure adherence to the process used to obtain written, informed consent from parents of children under 18 years of age to participate in any mental-health assessment or service?

# Consolidated Requirements

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## 5. Public Reporting Provisions

**REQUIREMENT:** The LEA has processes in place to carry out the required public reporting provisions.

*Section 1111(h)(2) and 1112(e)(2)(B)*

### Required Documentation:

#### 5.a. Communications used to inform parents and the public about:

- LEA and school performance on state assessments, as reported in WISEdash.
- When feasible, assessments required districtwide, including participation requirements; subject matter; purpose; as well as when and where such information is available; assessment time; and the schedule and format for disseminating results.

### Guiding Questions:

1. What strategies are used to ensure that parents and the public are informed of school and LEA performance?
2. How does the LEA ensure that parents and the public have access to LEA and school performance information?

# Consolidated Requirements

## 6. Consultation with American Indian Nations

**REQUIREMENT:** LEAs who educate students who are American Indian are required to consult with tribal nations and communities or with organizations, approved by the tribal nations, located in the area served by the LEA.

LEAs should conduct the consultation with Wisconsin tribal nations in advance of making significant decisions regarding their ESSA LEA Plan to ensure meaningful contributions are made.

*Section 8538*

### Required Documentation:

- ✓ **No additional materials required. The LEA submitted required documentation with the ESEA LEA Plan narrative.**

### Guiding Questions:

LEAs may invite representatives from American Indian Nations to participate in this conversation.

1. How does the LEA maintain ongoing consultation with American Indian Nations?
2. What successes and/or challenges were found with the consultation process?
3. How has the district worked with American Indian leaders and community members to:
  - Identify needs and priorities with regard to the development of programs to support American Indian student success?
  - Develop district plans, policies, goals, objectives, and outcomes for programs that affect American Indian students and families?
  - Leverage American Indian cultural expertise and knowledge to support district programs involving American Indian students?
  - Provide American Indian leaders and community members with regular opportunities to offer input and feedback on program implementation?
  - Determine effective ways to share and use data to support American Indian students?
  - Include culturally appropriate and realistic performance measures and data collection methods?
  - Regularly inform American Indian leaders and community members of program progress and impacts?

# Consolidated Requirements

## 7. Fiduciary Responsibility

**REQUIREMENT:** Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed.

These records must:

- be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated,
- be incorporated into the official records of the subrecipient,
- reasonably reflect the total activity for which the employee is compensated by the subrecipient,
- encompass both federally assisted and all other activities,
- comply with established accounting policies and practices of the subrecipient, and
- support the distribution of the employee's salary or wages.

*2 C.F.R. Part 200, Subpart E, §200.430(i)*

### Required Documentation:

**7.a. A written description of the procedures used by the subrecipient to determine an individual's charges that are allowable and properly allocated to the applicable Title grant.**

- The written description should include the following:
  - who determines whether an individual is eligible to be claimed on the grant,
  - how it is determined that an individual is allowable to be claimed on the applicable Title grant (i.e. Uniform Grant Guidance, grant requirements, DPI technical assistance),
  - how the distribution of the individual's time is determined,
  - how work time is documented by the individual,
  - how time worked is recorded into the payroll system,
  - how compensation is allocated within the payroll system based on distribution of the individual's time worked,
  - who prepares claims for the applicable Title grants,
  - what process is used to verify the claim agrees with the actual compensation paid the individual,
  - who reviews claims,
  - who signs claims, and
  - who files claims with DPI.

# Consolidated Requirements

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## 7.b. Sample supporting documentation for one employee identified in the budget filed with DPI for each applicable Title. The individual to be sampled will be determined by DPI.

- Supporting documentation for the individual selected shall include the following:
  - Payroll report for the individual selected from July 1 to current date. The payroll report should include the following. If it does not, attach the following information in addition to the payroll report:
    - dates of payroll;
    - compensation amount paid;
    - general ledger account coding;
    - total activity for which the employee is compensated, not exceeding 100% of compensated activities; and
    - documentation supporting the actual hours worked and how the compensation is allocated for any individual who's compensation is allocated among more than one activity or cost objective; more than one federal or federal and non-federal award; or more than one indirect or direct and indirect cost activity.

### Guiding Questions:

1. What documents (e.g., work schedule, class schedule, etc.) does the LEA use to support actual time worked?

**REQUIREMENT:** Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part under a federal award, are required until disposition takes place.

As a minimum, procedures will meet the following requirements:

- property records must be maintained;
- a physical inventory of the property must be taken and the results reconciled with the property records at least once every two years;
- a control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated;
- adequate maintenance procedures must be developed to keep the property in good condition; and
- if the subrecipient is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

*2 C.F.R. Part 200, Subpart D, §200.313(d)*

# Consolidated Requirements

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## Required Documentation:

**7.c. The local policy on capitalization of equipment, including threshold used to determine when equipment is determined to be a capital item.**

**7.d. Property records that include (all are required):**

- a description of the property;
- a serial number or other identification number;
- the source of funding for the property, including the Federal Award Identification Number (FAIN) found on the subaward received from DPI;
- who holds title;
- the acquisition date;
- the cost of the property and percentage of federal funds used for the property;
- the location of the property;
- use and condition of the property; and
- any disposition data, including the date of disposal and sale price of property.

**7.e. Evidence that a physical inventory of property is taken and the results are reconciled with property records at least once every two years, which includes:**

- a description of how the inventory was taken;
- documentation reflecting a check-off of items listed in the property records or equivalent support that a physical inventory was taken; and
- date of the inventory and date of most recent prior inventory.

**7.f. Written procedures in place to prevent and investigate loss, damage, or theft to equipment or supplies.**

**7.g. A written policy for selling property purchased with Title funds.**

## Guiding Questions:

1. What procedures are in place to ensure that new property, purchased with federal funds, is included in the LEA's property management system? How is the person responsible for property management made aware of new purchases?
2. What procedures are in place to ensure that materials and equipment purchased for private school equitable participation under ESEA programs are included in the LEA's property management system?

# Consolidated Requirements

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**REQUIREMENT:** Costs must meet the following general criteria in order to be allowable under federal awards:

- be necessary and reasonable,
- be allocable,
- conform to 2 C.F.R. Part 200 or the federal award requirements as to types or amount of cost items,
- be consistent with policies and procedures that apply uniformly to both federally-financed and other activities,
- be accorded consistent treatment. A cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost,
- be determined in accordance with generally accepted accounting principles (GAAP),
- not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program, and
- be adequately documented.

*2 C.F.R. Part 200, Subpart E, 200.403*

## Required Documentation:

- 7.h. Expenditure reports (one for each Title's project code) demonstrating that ESEA funds were spent as approved in each Title's budget. [Note: this documentation is required even if the LEA has a third party grant administrator assisting with the grant. This documentation is not applicable if the LEA joined a consortium as a participant.]**
- 7.i. Written description of the procedures used by the subrecipient to determine the cost is allowable and properly allocated to the applicable Title grant.**

## Guiding Questions:

1. Describe the process to determine which expenses are applied to each federal award?
2. Who is involved in the process to determine which expenses are applied to each federal award?

**REQUIREMENT:** For non-federal entities other than states, payment methods must minimize the time elapsing between the transfer of funds from the United States Treasury or the pass-through entity and the disbursement by the non-federal entity, whether the payment is made by electronic funds transfer, or issuance or redemption of checks, warrants, or payment by other means.

*See also §200.302 Financial management paragraph (b)(6). 2 C.F.R. Part 200, Subpart D, §200.305(b)*

The financial management system of each non-federal entity must provide for the following:

- Written procedures to implement the requirements of §200.305 Payment  
*2 C.F.R. Part 200, Subpart D, §200.302(b)(6)*

# Consolidated Requirements

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## Required Documentation:

### 7.j. Written procedures in place for cash management.

## Guiding Questions:

1. What written procedures does the LEA have in place for the obligation, liquidation, and claiming of federal funds?

**REQUIREMENT:** The federal awarding agency must establish conflict of interest policies for federal awards. The non-federal entity must disclose in writing any potential conflict of interest to the federal awarding agency or pass-through entity in accordance with applicable federal awarding agency policy.

*2 C.F.R. Part 200, Subpart B, §200.112*

The non-federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer or agent, any member of his or her immediate family, his or her partner, or an organization which employs, or is about to employ any of the parties indicated herein, has a financial or other interest in, or a tangible personal benefit from, a firm considered for a contract. The officers, employees, and agents of the non-federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-federal entity.

*2 C.F.R. Part 200, Subpart D, §200.318(c)(1)*

If the non-federal entity has a parent, affiliate, or subsidiary organization that is not a state or local government, or Indian tribe, the non-federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest mean that because of relationships with a parent company, affiliate, or subsidiary organization, the non-federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

*2 C.F.R. Part 200, Subpart D, §200.318(c)(2)*

## Required Documentation:

### 7.k. Written policies and procedures in place for conflicts of interest.

## Guiding Questions:

1. How does the LEA define and determine a conflict of interest?

# Consolidated Requirements

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**REQUIREMENT:** The non-federal entity must use its own documented procurement procedures, which reflect applicable state, local, and tribal laws and regulations, provided that the procurements conform to applicable federal law and the standards identified in this part. *2 C.F.R. Part 200, Subpart D, §200.318(a)*

**Required Documentation:**

- 7.I. Written procedures in place for procurement.

**Guiding Questions:**

1. Describe the procurement process?
2. Who is involved in the procurement process?

# Individual Program Requirements

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## **Title I, Part A—Improving Basic Programs Operated by Local Educational Agencies (High Standards for Improving Achievement Educationally Disadvantaged Students)**

### **Purpose**

The purpose of this Title is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

*Section 1001*

# Individual Program Requirements

## 8. Title I, Part A – Fiduciary Requirements

**REQUIREMENT:** The LEA shall use Title I, Part A funds to supplement the funds that would, in the absence of Title I, Part A, be made available from state and local sources for the education of students participating in programs assisted with Title I, Part A funding, and not supplant such funds. *Section 1118(b)*.

### Required Documentation 1118(c)(2)(A):

- 8.a. Policy or policies to ensure equivalence among schools in teachers, administrators, and other staff and equivalence among schools in the provision of curriculum materials and instructional supplies.
- 8.b. The LEA's salary schedule.
- 8.c. Evidence to support the data submitted in the Comparability Report.

### Guiding Questions:

1. How does the LEA ensure that state and local funds are distributed without taking a school's Title I status into account?
2. How does the LEA ensure Title I funds are used to support students identified with the greatest need?

**REQUIREMENT:** The LEA shall demonstrate that the methodology used to allocate state and local funds to each school receiving Title I, Part A funds ensures that such school receives all of the state and local funds it would otherwise receive if it were not receiving Title I, Part A funds. *Section 1118(b)(2)*

An LEA is exempt from this requirement if it has:

- one school;
- only Title I schools; or
- a grade span that contains only: a single school, non-Title I schools, or Title I schools (i.e., no methodology is required for this grade span.)

*Source: Supplement not Supplant Under Title I, Part A, Non-Regulatory Informational Document, United State Department of Education, June 2019.*

### Required Documentation:

- 8.d. The methodology used to allocate state and local funds ensuring that schools receiving Title I, Part A received all of the state and local funds they would otherwise receive if they were not Title I schools.

An LEA's methodology must:

- demonstrate that Title I schools receive all state and local funds for which they are entitled;
- be "Title I neutral"; and
- be documented

### Guiding Questions:

1. How does the methodology meet the needs of the most vulnerable students?
2. How does the LEA ensure the methodology is culturally responsive and relevant to the needs of the students?

# Individual Program Requirements

## 9. Title I, Part A – Schoolwide Programs

**REQUIREMENT:** A school shall establish a school team, including teachers, principals, other school leaders (included from LEA), paraprofessionals, parents and other members of the community (i.e. tribal organizations present within the community, and if appropriate, specialized instructional support personnel, technical assistance providers, school staff, and if the plan relates to a secondary school, students, and other individuals determined by the school) to implement a comprehensive plan that is based on a comprehensive needs assessment of the entire school that takes into account information on the academic achievement of children in relation to the challenging academic standards, particularly the needs of those children who are failing, or are at risk of failing, to meet the challenging state academic standards and any other factors as determined by the LEA.

*Section 1114(b)(2) and (6)*

### Required Documentation:

**9.a. Where applicable, a schoolwide plan for one school implementing the schoolwide model in each grade span (elementary, middle, high school) in the LEA. Each plan must demonstrate compliance with the following components:**

- Results of a comprehensive needs assessment on which the schoolwide plan was based.
- Strategies the school chose to improve student learning, with a focus on addressing the needs of those children who are most at risk. Strategies that will:
  - improve instruction for all children,
  - strengthen the academic program, increase the amount and quality of learning time, and
  - provide an enriched and accelerated curriculum.
- Strategies for ongoing parent engagement, including parent engagement strategies to improve student learning (as required under *ESSA Section 1116(c)(3)*).
- Tools and process to regularly monitor and revise the schoolwide plan.
- Coordination with federal, state, and local resources, services, and programs.

### Guiding Questions:

1. How does the LEA oversee each school's schoolwide plan implementation and annual review?
2. How does the LEA ensure that the LEA's professional development plan aligns with the needs of the schoolwide plans?

**Please have a school-level representative available (in person or via telephone) to answer the following:**

3. What are the methods used in each school to strengthen the core academic program, as well as to increase the amount and quality of learning time?
4. Describe strategies for meeting the educational needs of students who are failing or who are most at risk of failing the state's challenging academic achievement standards.
5. Describe the school's communication plan and how staff will be supported in learning and during implementation of the new strategies.

# Individual Program Requirements

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6. What are some examples of improved teaching and learning practices as a result of the evaluation process?
7. What are some examples of parent engagement activities implemented to improve student learning?

**REQUIREMENT:** A school shall make the schoolwide plan available to the LEA, parents, and the public (e.g. tribal leaders and community members) in an understandable and uniform format, and to the extent practicable, provided in a language that parent can understand.

*Section 1114(b)(4)*

**Required Documentation:**

- 9.b. Communication (e.g. website, letters, school board meeting minutes, etc.) demonstrating that the schoolwide plan was made available to the LEA, parents, and the public.

**Guiding Questions:**

1. How does the LEA ensure that all parents have access to the schoolwide plan?

# Individual Program Requirements

## 10. Title I, Part A – Targeted Assistance Programs

**REQUIREMENT:** Schools implementing a targeted assistance program may only provide services to eligible children identified by the school as failing, or most at risk of failing to meet the challenging state academic standards, based on multiple, educationally related, objective criteria established by the LEA and supplemented by the school. Children from preschool through grade two shall be selected solely on the basis of criteria, including objective criteria, established by the local education agency and supplemented by the school.

Eligible children include children who:

- are economically disadvantaged, children with disabilities, migrant children, and English learners. These children are eligible for services on the same basis as other children selected to receive services;
- attended Head Start or a Title I preschool in the previous two years;
- are in a local institution for neglected or delinquent children, or attend a community day program;
- are homeless and attending any school in an LEA that receives Title I funds.

*Sections 1115(c)(1) and (2)*

### Required Documentation:

For one school in each grade span in the LEA (elementary, middle, high) that has a targeted assistance program:

**10.a. Criteria and assessment tools used to select eligible students.**

**10.b. Criteria used to exit students from receiving Title I services.**

**10.c. If services are provided in grades K- 2, criteria used to identify K-2 students.**

**10.d. If preschool services are provided, criteria used to identify the Title I preschool students.**

**10.e. Criteria used to rank the eligible students most in need of academic assistance to meet the challenging state academic standards.**

NOTE: please do not include student-level data.

### Guiding Questions:

1. How is the Title I program reviewed and revised to ensure the students most at risk of failing are served?
2. What special populations, if any (i.e., homeless, neglected, and delinquent), were found eligible and served in schools that did not receive Title I funding?
3. How does the LEA ensure that eligible migrant students receive the benefit of locally provided programs and services on the same basis as other children?
4. How does the LEA ensure that eligible migrant children receive the benefit of supplementary Title I, Part A services on the same basis as other children?

# Individual Program Requirements

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## **REQUIREMENT: Targeted Assistance schools shall:**

- use resources necessary to provide a well-rounded education,
- use methods and instructional strategies to strengthen the academic program of the school,
- coordinate with and support the regular education program, and
- provide LEA assurances that the school will help provide an accelerated, high-quality curriculum; minimize the removal of children from the regular classroom; and on an ongoing basis, revise the targeted assistance program, if necessary, to provide additional assistance to enable the children to meet the challenging state academic standards.

*Section 1115(b)(2)(A-C) and (G)*

## **Required Documentation:**

For one school in each grade span in the LEA (elementary, middle, high) that has targeted assistance programs:

- 10.f. Examples of successful methods and instructional strategies used to support students receiving Title I services.**
- 10.g. Evidence supporting a process for reviewing student progress to ensure that instructional methods and strategies match student need. NOTE: please do not include student-level data.**

## **Guiding Questions:**

Please have a school-level representative available (in person or via telephone) to assist in responding to the guiding questions.

1. How do you determine if the methods and instructional strategies have been successful?
2. If applicable, give an example of a time these strategies did not work for a student/students and modification was required. What was the outcome?

How are Title I services provided to ensure that students are not removed from the classroom during core instruction (e.g., pull-out, push-in, extended day, etc.?)

# Individual Program Requirements

## 11. Title I, Part A – Parent and Family Engagement

**REQUIREMENT:** Each LEA and school that receives Title I, Part A funds shall develop jointly with, agree on with, and distribute to parents and family members of participating children a written parent and family engagement policy.

*Section 1116(a)(2) and (b)*

### Required Documentation:

#### 11.a. Either:

- LEA policy that applies to all parents and family members in all schools and meets the requirement of ESSA. In a one-school LEA, this is one and the same. OR
- The LEA parent and family engagement policy and individual Title I school policies that meet the requirements of ESSA.

11.b. Documentation (agendas; summaries of meetings, focus groups, or advisory committees; sign-in sheets; parent recommendations or feedback, etc.) demonstrating that parents and family members were involved in the planning, review, and improvement of Title I, Part A funded programs.

### Guiding Questions:

1. Describe the LEA's efforts to identify and engage parents and families who have limited English proficiency.
2. How are parents and family members who represent all groups of public and private school students served with Title I, Part A funds involved in the (1) planning, (2) review, and (3) improvement of programs and services supported with Title I, Part A funds?
3. How does the LEA seek out information to understand the diverse perspectives of parent and family members of Title I students?
4. Is there an example of how the parental involvement impacted policy?
5. Describe the LEA's efforts to identify and engage parents and families who have limited English proficiency.

**REQUIREMENT:** Each Title I school shall convene an annual meeting, at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's Title I program, explain the requirements of the Title I program, and the right of parents to be involved in the Title I program.

*Section 1116(c)(1-2)*

### Required Documentation:

11.c. Documentation of the annual meeting for one Title I school per grade span (elementary, middle, high school) informing parents of their school's participation in Title I, Title I requirements, and parents' right to be involved.

### Guiding Questions:

1. What does the LEA do to encourage parents who represent all public and private school students receiving Title I services to attend their school's annual meeting?
2. Did the LEA offer a flexible number of meetings, such as meetings in the morning or evening; transportation; childcare; or home visits?

# Individual Program Requirements

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**REQUIREMENT:** Provide parents of children receiving services funded by Title I with:

- timely information about the services provided;
- a description and explanation of the curriculum, the forms of assessment used to measure student progress, and the achievement levels of the challenging state academic standards; and
- if requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible.

*Section 1116(c)(4)(A-C)*

**Required Documentation:**

- 11.d. Documentation for one Title I school per grade span (elementary, middle and high school) of timely information provided to parents, including curriculum and assessments used along with achievement levels of state academic standards.**

**Guiding Questions:**

1. What ongoing processes does each Title I school use to ensure communication regarding curriculum, assessment, and student benchmarks continues with parents (of public and private school students receiving Title I services) throughout the school year? What did the LEA find to be most successful?
2. How does each Title I school ensure that parents understand how to communicate and partner with school staff to help their child meet academic standards?
3. How does the school ensure that families of English learners understand school communications?

**REQUIREMENT:** Each school served with Title I shall jointly develop with parents for all children receiving Title I services a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the state's high standards.

*Section 1116(d)*

**Required Documentation:**

- 11.e. A School-Parent Compact for one school per grade span (elementary, middle, high school) receiving Title I funds. Each compact shall (all are required):**

- Describe the school's responsibility to provide high quality curriculum and instruction in a supportive and effective learning environment that enables children receiving Title I services to meet the challenging state academic standards;
- Describe how parents are responsible for supporting their children's learning; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and
- Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum, parent-teacher conferences; frequent progress reports to parents; reasonable access to staff; opportunities to volunteer in, participate in, and observe child's class, and ensuring regular two-way, meaningful communication.

# Individual Program Requirements

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## Guiding Questions:

1. How does each Title I school ensure the compacts are jointly developed and discussed with parents (of public and private school students receiving Title I services) at least annually?

**REQUIREMENT:** Each school served with Title I shall build capacity of parents to ensure effective involvement of parents and to support a partnership among the school, parents, and the community to improve student academic achievement.

*Section 1116(e)*

## Required Documentation:

- 11.f. A list of strategies or sample materials from the LEA and one Title I school at each grade span (elementary, middle, and high) that are used to help parents work with their children.**
- 11.g. Evidence that LEA and school staff are educated, with the assistance of parents, on the value of parents' contributions and the importance of outreach to parents and working with parents.**

## Guiding Questions:

1. What benefits did the LEA or school find has the LEA or school found to be beneficial in meaningfully engaging parents and family members of Title I public and private school students in academic learning?
2. How does the LEA ensure that parental and community participation includes all parents of public and private school students receiving Title I services? This should include the population of the school, as well as those who are economically disadvantaged, English language learners, and students with disabilities.
3. What professional development is available to help staff understand the value of family engagement in student learning?
4. Are parents and family members invited to help train staff, train other parents, or serve on a district parent advisory council?
5. How does the LEA and Title I school ensure that the information, materials and capacity building opportunities are provided to parents in a format and language they can understand?

# Individual Program Requirements

## 12. Title I, Part A – Coordination with Early Childhood Development Program

**REQUIREMENT:** An LEA receiving Title I, Part A shall carry out required activities with Head Start agencies and, if feasible, other entities carrying out early childhood development programs. Required activities include:

- developing and implementing a systematic procedure for transferring records;
- establishing channels of communication to coordinate programs;
- conducting meetings with parents and teachers from both entities to discuss the developmental and other needs of individual children;
- organizing and participating in joint professional development; and
- linking the educational services provided by the LEA with Head Start.

*Section 1119*

### Required Documentation:

- 12.a. An agreement with the local Head Start agency to carry out the required activities. (If there is no Head Start agency in the LEA, then this is not applicable.)**
- 12.b. If applicable and feasible, agreements with other early childhood development programs to carry out the required activities.**

### Guiding Questions:

1. What transition strategies has the LEA found successful?
2. How does the LEA know these strategies were successful?
3. How does the LEA coordinate family engagement efforts with other programs in the community, including preschool programs and parent resource centers?

# Individual Program Requirements

## 13. Title I, Part A – Coordination to Serve Students Eligible in Title I and Non-Title I Schools

### HOMELESS

**REQUIREMENT:** LEAs will ensure that students experiencing homelessness in Title I schoolwide, targeted assistance, and non-Title I schools receive services to support their enrollment, attendance, and full access to education.

*Section 1112(b)(6)*

The LEA must reserve Title I, Part A funds and use other state or local funds to provide educationally related support services to students experiencing homelessness.

*Section 1113 (c)(3)(A)*

#### Required Documentation:

- 13.a. Procedures to identify the needs of students experiencing homelessness, including academic and support services.
- 13.b. A list of supplemental academic and support services provided to students experiencing homelessness in Title I and non-Title I schools. Include the funding sources for the services provided. (Note: In Title I schools, these should be services provided only to students experiencing homelessness, not services available to all Title I students.)

#### Guiding Questions:

1. How are the needs of students experiencing homelessness determined upon enrollment?
2. What are some examples of successful academic services provided to students experiencing homelessness?
3. Describe the process used to ensure adequate financial resources are made available to serve students experiencing homelessness in all schools?
4. How does the LEA determine the Title I, Part A reservation for students experiencing homelessness?
5. What community resources are leveraged to meet the needs of students experiencing homelessness?

### MIGRANT

**REQUIREMENT:** Eligible migratory children (identified by the State which will notify the LEA) receive services under Title I, Part A on the same basis as other children.

*Section 1112(c)(1)*

#### Required Documentation:

- 13.c. Procedures to identify the needs of eligible migratory students.
- 13.d. A list of supplemental academic and support services provided to migratory students.

# Individual Program Requirements

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## Guiding Questions:

1. Describe the process for ensuring the Student Information System (SIS) is updated to reflect the student's "migrant" status when it receives notification from the state that eligible migratory students are enrolled in the district?  
*Section 1304(c)(8)*
2. How is the LEA ensuring that migratory students and formerly migratory students are receiving Title I, Part A services?  
*Section 1115(c)(2)(C)*
3. What opportunities do families have to provide input on their children's educational needs and programming?
4. Describe the process for timely (next day) transfer of records for migratory students, both for interstate and intrastate requests?

## NEGLECTED

**REQUIREMENT:** LEAs will ensure that students in local institutions for neglected children receive services comparable to services for students in Title I schools.

*Section 1113 (c)(3)(A)*

## Required Documentation:

- 13.e. Procedures to identify the needs of students in local institutions for neglected children, including academic and support services that are needed.
- 13.f. List of the supplemental academic and support services provided to students in local institutions for neglected children. Include the funding sources for the services provided.

## Guiding Questions:

1. How does the LEA determine the Title I, Part A, reservation for students in neglected institutions?  
What are some examples of successful academic services provided to students in neglected institutions?

# Individual Program Requirements

## 14. Title I, Part A – Out-Of-Home Care (Foster Care)

**REQUIREMENT:** The local education agency (LEA), in collaboration with the child welfare agency (CWA), has developed and implemented clear written procedures which include how transportation is provided, arranged, and funded for the duration of time a student is in out-of-home care.

Section 1112(c)(5)

### Required Documentation:

14.a. Written procedures governing transportation for students in out-of-home care.

### Guiding Questions:

1. How do the procedures ensure that transportation is provided, arranged, and funded for students in out-of-home care?
2. How does the LEA ensure the procedures are followed so that transportation to the school of origin will begin immediately?
3. What are the written processes, policies, or procedures that ensure a student remains in the school of origin unless, in collaboration with the CWA, it is determined that it is not in the student's best interest?

**REQUIREMENT:** When a determination is made for a student in out-of-home care that it is not in their best interest to remain in the school of origin, the LEA of the new school will immediately enroll the student, even if the student is unable to produce records normally required for enrollment. The LEA will immediately contact the last school the student attended to obtain relevant academic and other records.

Section 1111(g)(1)(E)

### Required Documentation:

14.b. Written processes, procedures, and/or policies that ensure the immediate enrollment of students in out-of-home care.

14.c. Written processes, procedures, and/or policies that ensure the immediate contact of the school last attended to obtain relevant academic and other records.

Section 1111(g)(1)(E)(iii)

### Guiding Questions:

1. How do the procedures ensure that the student will be immediately enrolled, even if the student is unable to produce records normally required for enrollment?

Describe the district processes, procedures, and/or policies to obtain relevant academic and other records.

# Individual Program Requirements

## 15. Title I, Part A – Targeted Support & Improvement Schools (TSI) and/or Additional Targeted Support & Improvement Schools (ATSI)

**REQUIREMENT:** LEAs are responsible to support schools identified for targeted support and improvement (TSI) and/or schools identified for additional targeted support and improvement (ATSI). Each school is responsible for partnering with stakeholders to develop and implement a school improvement plan to improve student outcomes. The LEA must approve and monitor these school improvement plans.

Each school improvement plan must:

- be informed by student performance indicators, including performance when measured against state long-term goals;
- include evidence-based intervention improvement strategies;
- identify and address resource inequities;
- be approved by the LEA prior to implementation;
- be monitored by the LEA; and
- result in additional action following unsuccessful implementation of such plan after a number of years determined by the LEA.

*Section 1111(d)(2)*

### Required Documentation:

- 15.a. A copy of the approved school improvement plan for each school identified for TSI/ATSI, including the date when the plan was approved.
- 15.b. A description of LEA's process to support and monitor the development and implementation of the school improvement plan.

### Guiding Questions for LEAs with schools identified for TSA and ATSI:

1. What systems does the LEA have in place to support identified schools in the following:
  - a. Partnering with [stakeholders](#) to develop and implement an improvement plan to improve student outcomes;
  - b. Holistically analyzing data, including student performance and engagement data as well as qualitative measures; and
  - c. Implementing evidence-based improvement strategies?
2. What systems does the LEA have in place to prioritize support and funding for identified schools, particularly Title II funds, as described in the LEA Plan, Question #11?
  - a. How does the LEA monitor for effective use of those funds for improving student outcomes in identified schools?
3. What systems does the LEA have in place to analyze and address the identified resource inequities?
4. For LEAs utilizing Title I and Title II funds for rewards and incentives in schools identified as TSI/ATSI, how does the LEA monitor for effective use of those funds for recruiting and retaining effective staff?
5. For LEAs with ATSI schools, what district-level systems of support and continuous improvement are in place to ensure improved achievement for the identified student groups?

# Individual Program Requirements

## 16. Title II, Part A – Preparing , Training, and Recruiting High Quality Teachers, Principals, or Other School Leaders

### Purpose

The purpose of this grant is to increase student achievement through strategies, such as improving teacher and principal quality and increasing the number of effective teachers and leaders in the districts. LEAs may also use these funds to recruit and retain effective teachers. Funds must be targeted to improve equitable access to effective teachers and leaders by providing students from low-income families and minority students greater access to effective teachers, principals, and other school leaders.

The law requires all instructional paraprofessionals working with Title I students in Title I targeted assistance schools and all instructional paraprofessionals working in Title I schoolwide programs (regardless of funding source) be certified by meeting the hiring requirements.

**REQUIREMENT:** The LEA shall fund activities that are based on the needs assessment by addressing the learning needs of all students, including children with disabilities, English learners, and gifted and talented students; and are aligned with college- and career-ready standards. All activities shall be driven by evidence-based strategies and have sustainable, measurable, and positive impact on student achievement in a well-rounded education. *Sections 2102(b)(2)(A), 2103(b)(2), 2103(b)(3)(E)*

### Required Documentation:

- 16.a. Evidence the activities are based on an analysis of the needs assessment, are aligned with college- and career-ready standards, are driven by evidence-based approaches, and impact student achievement in a well-rounded education.**

### Guiding Questions:

1. What activities have been used to address the needs of gifted and talented students?
2. If an LEA chooses to use Title II, Part A for Science, Technology, Engineering, and Mathematics (STEM), what activities have been offered to all instructional staff to ensure that all students, including students with disabilities, English learners, and gifted and talented students have access to STEM education and literacy?

# Individual Program Requirements

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**REQUIREMENT:** The LEA shall develop and implement initiatives to assist in recruiting, hiring, and retaining effective teachers, principals, and school leaders in low-income schools with high percentages of ineffective teachers and leaders, and high percentages of students who do not meet the challenging state academic standards, to improve within-district equity in the distribution of teachers and leaders.

*2103(b)(3)(B) and section 1111(g)(1)(B)*

## Required Documentation:

**16.b. A plan for equitable distribution of teachers and leaders.**

## Guiding Questions:

1. Describe the process used to monitor the achievement gap identified in the plan for equitable distribution of teachers and leaders to address the socioeconomic, race/ethnicity, special education, and English learner student needs.
2. Does the LEA have a plan to ensure that minority students and students from low-income families are not taught at a higher rate than other students by ineffective teachers?
3. Describe the process used to identify the teachers and principals having the greatest success improving student achievement and closing student achievement gaps?
4. Describe the process used to ensure all Title II, Part A funds target schools with the highest proportion of ineffective teachers or principals, or with largest proportion of students who do not meet the college- and career-ready standards and/or the Wisconsin Academic Standards?

**REQUIREMENT:** The LEA shall develop and provide training for school leaders including coaches, mentors, and evaluators on how to accurately differentiate performance, provide constructive feedback, and use evaluation results to inform decision making about professional development, improvement strategies, and personnel decisions.

*Section 2103(b)(3)(B)(V)*

## Required Documentation:

**16.c. Documentation (timelines, meeting calendars or agendas, observation/rating schedules, and training schedules, etc.) demonstrating opportunities for educator advancement initiatives to promote professional growth.**

## Guiding Questions:

1. Describe the process used to ensure those observing principal or teacher practice have an understanding of effective practices and levels of performance?
2. How does the LEA ensure those observing principal or teacher practice have the ability to lead or facilitate high quality coaching conversations based on identified levels of practice?
3. What resources are provided to principals and teachers to support identified areas needing growth?
4. What incentives or opportunities are provided to exemplary principals and teachers?

# Individual Program Requirements

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**REQUIREMENT:** The LEA shall recruit and hire effective teachers for the purpose of improving student achievement. Additionally, all teachers working in a program supported with Title I funds are appropriately licensed.

*Section 2103(b)(3)(D), Section 1111(g)(2)(J)*

## Required Documentation:

- 16.d. A roster from every school in the LEA, listing the names and license numbers of the teachers, along with their teaching assignment(s).
- 16.e. A written plan to ensure that all teachers are effective teachers.
- 16.f. A recruitment plan.
- 16.g. Written documentation that the LEA is offering resources, such as tuition reimbursement, release time, and test preparation to inexperienced teachers teaching with emergency or provisional credentials, and teachers who are not teaching in the subject or field for which the teacher is certified or licensed.

## Guiding Questions:

1. Describe the mechanism used to recruit effective candidates?
2. What services and resources are offered to inexperienced teachers to build their capacity address the socioeconomic, race/ethnicity, special education and English learner student educational needs?
3. What services and resources are offered to teachers teaching with emergency or provisional credentials; and teachers not teaching in the field or subject they are certified or licensed, to become effective teachers?
4. Describe the process used to ensure all new teachers are receiving mentoring?

# Individual Program Requirements

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## 17. Title II, Part A– Qualifications of Paraprofessionals

**REQUIREMENT:** LEAs shall have all instructional paraprofessionals in schools implementing a Title I schoolwide program (regardless of funding source) and all instructional Title I paraprofessionals funded by Title I in targeted assistance schools be certified by meeting the hiring requirements.

*Section 1111(g)(2)(J)*

### Required Documentation:

- 17.a. A description of the process used to ensure that all new hires for paraprofessionals meet the ESEA requirements prior to employment.
- 17.b. Names and credentials of all paraprofessionals in Title I schoolwide programs and Title I funded paraprofessionals in Title I targeted assistance programs.

### Guiding Questions:

1. Describe the process to ensure that all instructional paraprofessionals meet the ESEA requirements prior to employment.

# Individual Program Requirements

## 18. Title III, Part A – English Language Acquisition, Language Enhancement, and Academic Achievement Act

### REQUIRED USES OF TITLE III, PART A

*Section 3116(a)(b)(c)(d)*

1. To increase the English language proficiency of English learners by providing effective language instruction educational programs that meet the needs of English learners and demonstrate success in increasing English language proficiency and student academic achievement.
2. To provide effective professional development to classroom teachers (including teachers in classroom settings that are not the settings of language instruction educational programs), principals and other school leaders, administrators, and other school or community-based organizational personnel. (sic)
3. To provide and implement other effective activities and strategies that enhance or supplement language instruction educational programs for English learners, which shall include parent, family, and community engagement activities; and may include strategies that serve to coordinate and align related programs.

### Required Documentation:

- 18.a. **Effective and timely procedures to identify, assess, and place English learners, including immigrant children and youth who have a primary/home language other than English and who are EL in an effective language instruction education program consistent with the statewide entry and existing procedures.**  
*Section 3116(b)(2); 3113(b)(3)(b) & 1112(e)(3)(A)*
- 18.b. **Evidence that LEA follows state established program exit criteria so that a student is not maintained in an English language instruction program longer than is necessary.**  
*Section 1112(e)(2)(A)(vi)*
- 18.c. **Evidence that the programs and activities -- including language instruction education programs -- developed, implemented, and administered will help English learners achieve English language proficiency and meet challenging state academic standards.**  
*Section 3116(c) Section 3115(6)(c)*
- 18.d. **Documentation of the LEA's two-year monitoring and four-year reporting of academic progress on the state's academic assessment/s of students that have exited EL status.**  
*Section 3121(a)(4-5)*
- 18.e. **Evidence that LEA annually assesses K-12 English learners on the state's English language proficiency assessment, the ACCESS for ELLs.**  
*Title I, Section 1111(b)(1) & Section 3116(b)(2)*
- 18.f. **A professional development plan.** *Section 3115(c)(2)(D)*
- 18.g. **Evidence of reasonable, meaningful, and sufficient efforts to involve parents/guardians of students who are English learners in the educational program.**  
*Section 3115(c)(2)(A-D) and Section 1112(e)(3)(c)*

# Individual Program Requirements

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## Guiding Questions:

1. Describe the process in place to identify English learners eligible to access language education services?
2. How does the LEA ensure the language instruction education program model used is based on sound theory and will effectively increase English language proficiency and substantially increase student academic achievement? What is the LEA's plan to ensure the language program includes sufficient resources, including qualified ESL staff, time, and materials to effectively implement the chosen Language Instruction Education Program/s?
3. How does the LEA annually evaluate the English language instruction educational program effectiveness and modify the program based on this evaluation?
4. Describe the process in place to engage stakeholders, including representatives from Institutes of Higher Education, early childhood, family, and community organizations to develop its effective Language Instruction Education Program?
5. How does the LEA ensure both general education and ESL teachers in all classrooms with ESLs grades K-12 implement the English Language Development (ELD) standards?
6. How does the LEA authentically engage parents and families in school systems, and ensure they meaningfully participate in their child's school, in a language they can understand?
7. How does the LEA design its professional learning to ensure it is based on the identified needs of students and educators and is of sufficient intensity and duration for classroom teachers, principals, and other school leaders, administrators, and other school or community-based organization personnel to improve the instruction and assessment of ESLs?

**REQUIREMENT:** Teacher English language fluency and target language fluency.  
*Section 3116(c)*

## Required Documentation:

**18.h. Evidence that all teachers serving English learner students in a Title III funded language instruction educational program are fluent in English and any other language used for instruction, including oral and written communication skills.**

## Guiding Questions:

1. How does the LEA ensure that teachers who work in a language instructional program for ESLs are fluent in English, and any other language used for instruction?
2. How does the LEA ensure teachers and new teacher candidates have proper certification or licensure oral and written communication skills in English and any other language used in instruction?

# Individual Program Requirements

**REQUIREMENT:** Title III, Immigrant. For Title III Immigrant and Youth Discretionary Grant recipients as described under section.

*Sec. 3113(b)(2)*

Note: Complete this section if LEA received discretionary Immigrant Children and Youth funds directly or via work within a consortium.

## **Required Documentation:**

- 18.i. Evidence that funding under this part was used for supplemental activities to provide enhanced instructional opportunities for immigrant children and youth.**
- 18.j. A complete list of system expenditures of immigrant funds from July 1 to June 30 of the most recent fiscal year and purchase orders where applicable.**

## **Guiding Questions:**

1. Describe the process used to select the immigrant-specific activities and/or materials?
2. What evidence demonstrates that these programs/services/activities/materials were selected based on the needs of the immigrant population within the LEA?
3. How does the LEA evaluate the effectiveness of the Immigrant and Youth Grant?

# Individual Program Requirements

## 19. Title IV, Part A – Student Support and Academic Enrichment

### **Purpose:**

The purpose of the Title IV, Part A, Student Support and Academic Enrichment grant is to improve students' academic achievement by providing all students with access to a well-rounded education, improving school conditions for student learning, and improving the use of technology in order to improve academic achievement and digital learning for all students.

**REQUIREMENT:** LEAs are required to engage in continued consultation with key stakeholders to improve coordination with other local strategies, programs, and activities being conducted in the community.

*Section 4106(c)(1-2)*

### **Required Documentation:**

- 19.a. Evidence of key stakeholder consultation (i.e sign-in sheets, meeting minutes, surveys/feedback).
- 19.b. Process used to collect ongoing input from key stakeholders.

### **Guiding Questions:**

1. How did the LEA determine which stakeholders to include for consultation on the application?
2. What opportunities for continued consultation exist for key stakeholders?
3. Describe how the LEA is leveraging other local, state, and federal resources?

**REQUIREMENT:** LEAs will periodically evaluate the effectiveness of the selected activities.

*Section 4106(e)(1)(E)*

### **Required Documentation:**

- 19.c. Evidence that selected activities align with program objective(s) and intended outcomes.
- 19.d. A synopsis of how site will evaluate the impact of chosen activities.

### **Guiding Questions:**

1. How are activities being evaluated for effectiveness based on the objectives and intended outcomes?

**REQUIREMENT:** LEAs will prioritize the distribution of funds to schools with greatest needs.

*Section 4106(e)(2)(A)*

### **Required Documentation:**

- 19.e. A synopsis of how funded activities align with schools of greatest need.

### **Guiding Questions:**

1. What criteria was used to determine which schools received funding?