

# Elementary and Secondary Education Act (ESEA) Monitoring

## *What you need to know!*

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Shay Morris, Education Consultant  
Wisconsin Federal Funding Conference  
February 27, 2024



## Session Objectives

Provide an overview of ESEA Consolidated Monitoring Process  
Including an overview of:

- The various levels of monitoring
- The ESEA Monitoring Guidance Document
- How to prepare for the various monitoring components
- Overall ESEA Best Practices

# Introductions

Name

School District

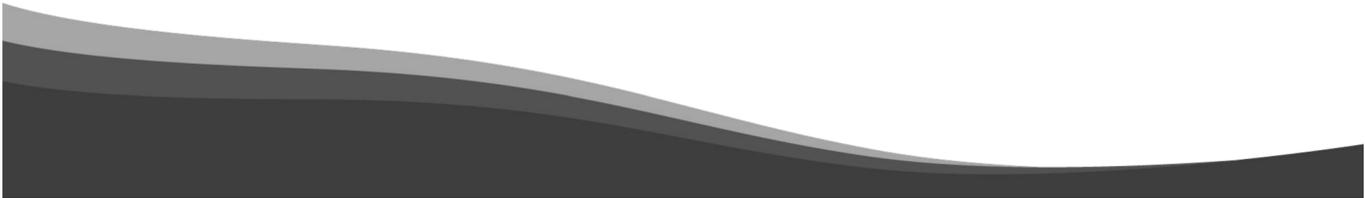
Position

What is one question you have about ESEA monitoring?

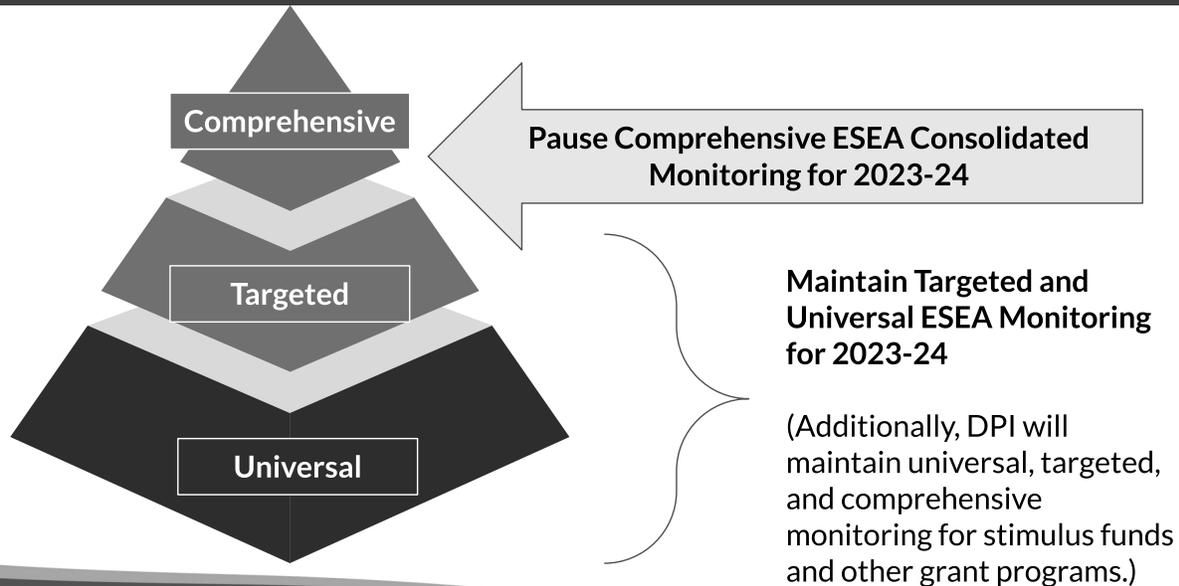
Wisconsin DPI Title I Team [[staff directory](#)]:

- Kim Jenkins
- Shay Morris

## Why does the DPI Monitor Local Educational Agencies (LEAs)?

- Required by the United States Department of Education
  - Ensures that LEAs are in compliance with the federal requirements
  - Supports LEAs in the implementation of the ESEA programs
  - Ensures that all students have fair, equal, and ample opportunity to obtain a high-quality education
- 

# ESEA Consolidated Monitoring 2023-24



## What is ESEA Universal Monitoring?

### 2023-24 ESEA Monitoring Guidance Document

- Sections A - C only

### ESEA Universal Monitoring Overview

### ESEA Universal Monitoring Technical Assistance



**2023-24**

Elementary and Secondary Education Act  
(ESEA)

Consolidated Monitoring Guidance Document  
for Local Educational Agencies

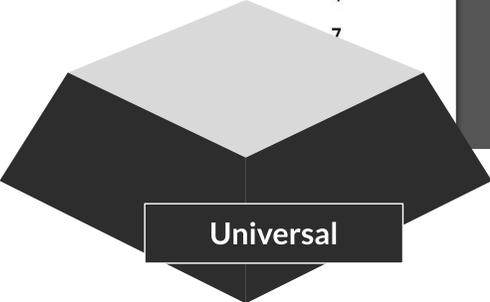
# ESEA Universal Monitoring

## Universal Monitoring - WISEgrants

2023-24 ESEA Monitoring Guidance Document 3 / 84 | - 100% + | [ ] [ ]

### Table of Contents (links)

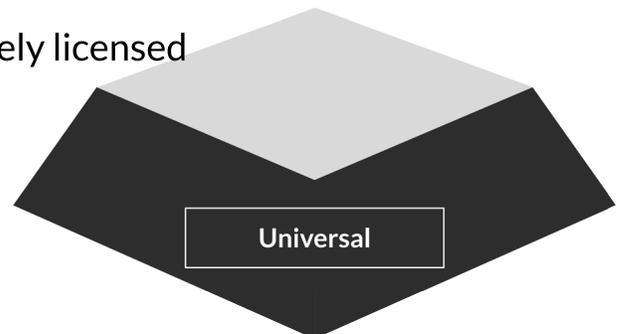
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Section A - Public Reporting	
Section B - Title I, Part A, Family Engagement	
Section C - Identification of Migratory Students	



# ESEA Universal Monitoring

## Universal Monitoring - WISEgrants

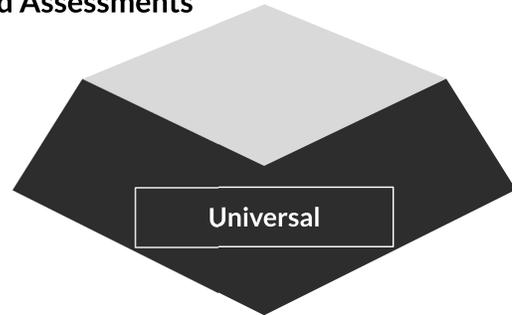
- Assurance forms
  - General Education Provisions Act
  - ESEA Assurances
- Applications and budgets
  - Ensuring staff are appropriately licensed
  - Title I Rank and Serve
- Claims
- LEA Plans



# ESEA Universal Monitoring

## Universal Monitoring - New WISEgrants Module

- Created based on feedback from the 2022-23 pilot project
- Include the following requirements:
  - Parents' Right to Inquire
  - Notification of Teacher Qualifications
  - Communication Regarding Curriculum and Assessments
  - Public Reporting
  - Mental Health Assessments
  - Notice to parents regarding Language Instruction Educational Programs (LIEP)
  - Communication of Schoolwide Plan
  - Title I Annual Meeting
  - Identification of Migratory Students



# ESEA Universal Monitoring

## Requirement C.1. Identification of Migratory Children

LEAs must have procedures in place to identify migratory students.

*Section 1111(b)(2)(B)(xi)(VI)*

*This is required for all LEAs whether or not they have or had migratory students enrolled in their LEA.*

### **C.1. Required Documentation**

Internal procedures used to identify migratory students and their needs.

### **Resources**

- Sample procedures for identifying migrant students (English and Spanish): [https://dpi.wi.gov/sites/default/files/imce/migrant/Example\\_Questions\\_for\\_MEP\\_Enrollment\\_ENG-SPAN\\_Website.docx](https://dpi.wi.gov/sites/default/files/imce/migrant/Example_Questions_for_MEP_Enrollment_ENG-SPAN_Website.docx)
- DPI's webpage for identifying migratory students: <https://dpi.wi.gov/migrant/identifyingmigratorystudents>
- DPI's webpage for migrant status in WISEdata: <https://dpi.wi.gov/wise/data-elements/migrant-status>

### **C.1. Rubric**

<b>Incomplete</b>	The LEA does not have procedures to identify migratory students and their needs.
<b>Complete</b>	The LEA has procedures to identify migratory students and their needs.

Use  
These

Resources

# Universal Monitoring Process

## ALL LEAs RECEIVING ESEA TITLE GRANTS

All LEAs receiving ESEA federal funding must comply with requirement whether they are selected for ESEA Universal Monitoring or not.

~ 90 LEAs will be required to upload documentation demonstrating compliance for Sections A - C. Each requirement includes resources for LEAs to meet the requirements.

DPI will desk review ~30 LEAs selected randomly for compliance.

ALL LEAS RECEIVING ESEA TITLE GRANTS

~90 LEAs

~30 LEAs

# Notifications and Process

DPI will notify LEAs selected for ESEA universal monitoring.

December 2023

DPI reviews documentation and notify LEAs if corrective action is needed.

April 2024

DPI sends close out notifications when corrective action is complete.

June 2024

March 2024

May 2024

Documentation submission deadline. DPI randomly selects ~30 LEAs for documentation review.

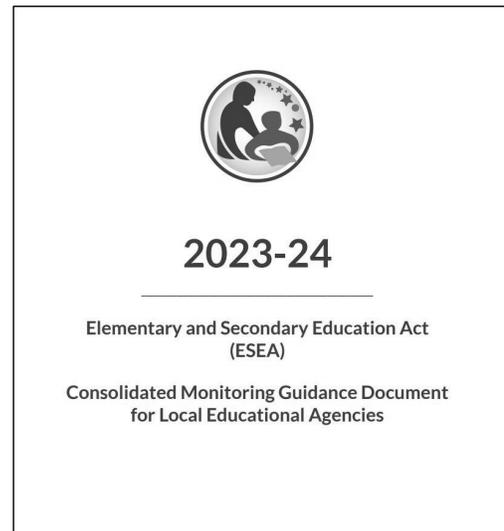
Corrective action is due.

\*Notifications and communications will happen through WISEgrants

# What is ESEA Targeted Monitoring?

## 2023-24 ESEA Monitoring Guidance Document

- Sections D only

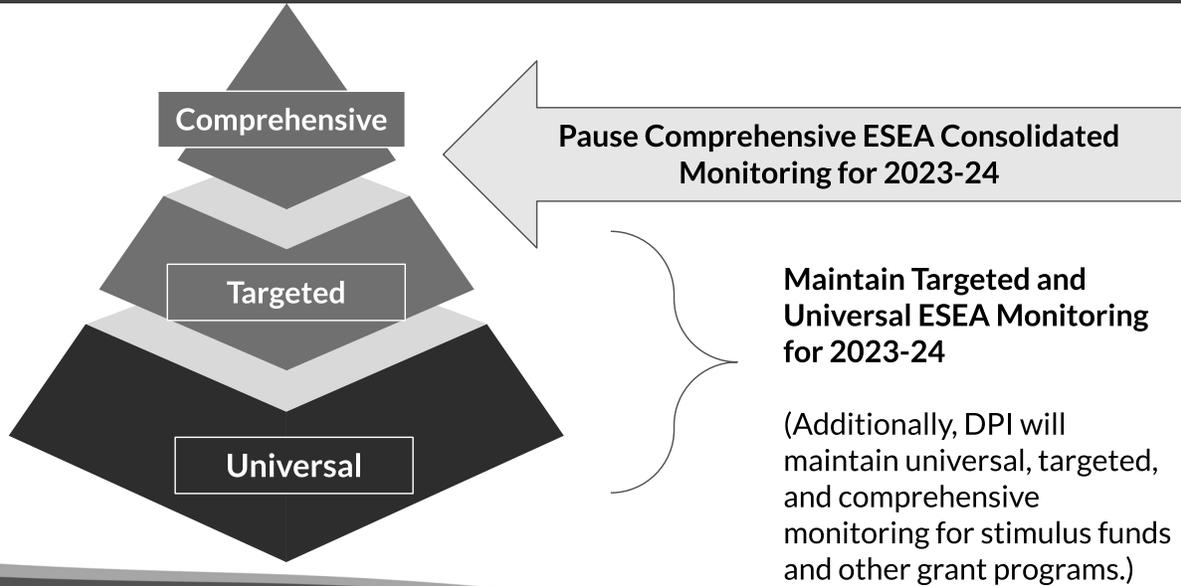


# What is ESEA Targeted Monitoring?

Subrecipients are evaluated for risk based on the identified factors which include:

- Total dollar amounts of federal funds awarded,
- Known fraud,
- Significant or multiple audit findings,
- New subrecipient of a federal award,
- Claims not matching annual report, programmatic monitoring findings, and other fiscal concerns

# ESEA Comprehensive Monitoring 2023-24

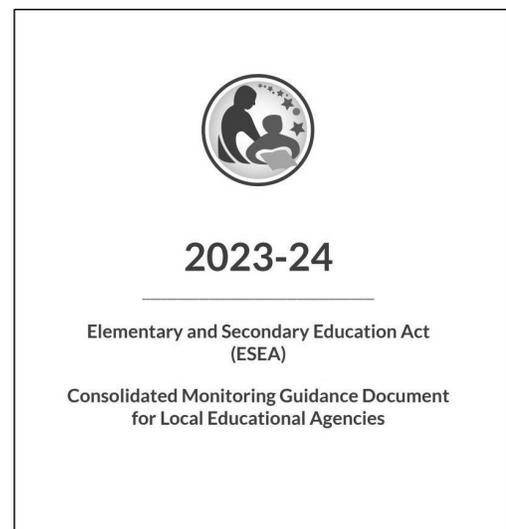


## What is ESEA Comprehensive Monitoring?

### 2023-24 ESEA Monitoring Guidance Document

Requirements include:

- Sections 1 -5 (overall requirements)
- Title I, Part A
- Title II, Part A
- Title III, Part A
- Title IV, Part A



# What is ESEA Comprehensive Monitoring?

Comprehensive monitoring includes a greater level of support to a small group of LEAs selected from a risk assessment conducted by DPI.

- DPI staff conducts a desk review and on-site visit with these selected LEAs to provide more intensive guidance and support.
- Being selected for comprehensive monitoring does not mean the LEAs have done something wrong.
- LEAs should view intensive monitoring as an opportunity to seek support and guidance as appropriate.

# What is ESEA Comprehensive Monitoring?

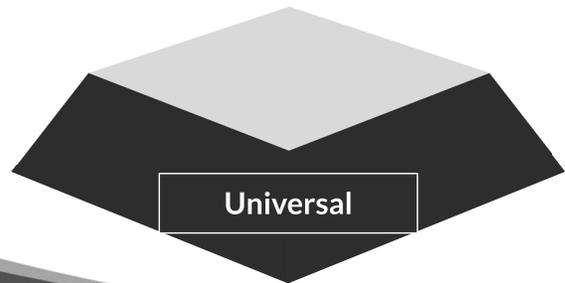
Risk assessment factors used to determine which LEAs are selected for comprehensive monitoring include:

- Student assessment and graduation data
- Inequitable distribution of teachers
- Combined allocations for all stimulus grants
- History of past single audit findings
- History of late application and report submissions.

# ESEA Universal Monitoring for Equitable Participation

## Universal Monitoring - Equitable Participation (WISEgrants)

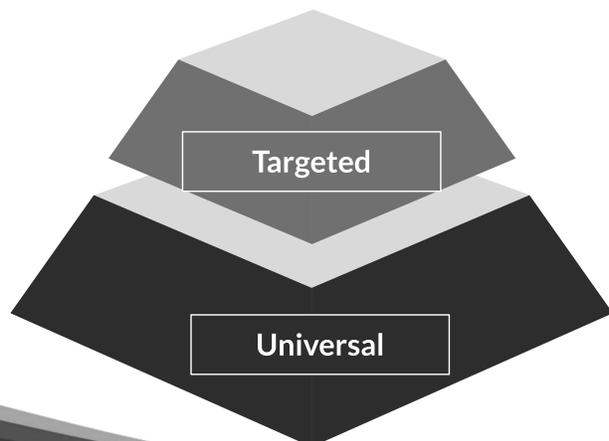
- Affirmation of consultation with private school representatives
- Applications and budgets
- Review of claims from the previous year\*
  - If an LEAs claimed less than 10% of a grant's private share, the LEA will be identified for additional support.
  - Attend a virtual webinar Nov 2023  
(new for 2023-24)



# ESEA Targeted Monitoring for Equitable Participation

## LEAs providing Equitable Services to Private Schools

- 2023-24 ESEA Monitoring Guidance Section D
  - Ongoing consultation
  - Public control of funds
  - Services provided
  - Survey of private schools
- **Google Site for 2023-24**
  - WISEgrants for 2024-25



# LEAs Selected for Monitoring

- ESEA Universal Monitoring List of Cohort Year 1
- ESEA Universal and Targeted Monitoring for Equitable Participation
- ESEA Consolidated Monitoring - *paused for 2023-24*

## How to Prepare for ESEA Comprehensive Monitoring?

### Section 6 - Title I Schoolwide Programming

*This section is only required for LEAs with one or more Title I schools implementing schoolwide programming. This section is not required if all the Title I schools in the LEA are implementing Title I targeted assistance programming.*

#### Resources

- DPI's webpage regarding Title I Schoolwide programs: <https://dpi.wi.gov/title-i/schoolwide-program>

#### Requirement 6.1. Schoolwide Plan

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)

#### 6.1. Required Documentation

A schoolwide plan for one school implementing the schoolwide model in each applicable 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 processes to regularly monitor and revise the schoolwide plan.
- Coordination with federal, state, and local resources, services, and programs.

*Note: Schools could use their continuous improvement plans as Title I schoolwide plans, as long as those plans included the components listed above.*

Explore Existing Resources

Read Closely



2023-24

Elementary and Secondary Education Act  
(ESEA)  
Consolidated Monitoring Guidance Document  
for Local Educational Agencies

# Comprehensive Monitoring Prep

?’s

Self Assess

## 6.1. Guiding Questions

1. Describe the process used to oversee each school's schoolwide plan implementation and annual review.
2. How does your 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:**

1. What are the methods used in each school to strengthen the academic programs, as well as to increase the amount and quality of learning time?
2. Describe strategies for meeting the educational needs of students who are not meeting the state's challenging academic achievement standards.
3. Describe the training/professional learning provided to staff in order to implement the schoolwide plan.
4. What are some examples of improved teaching and learning practices as a result of the evaluation process?

## 6.1. Rubric

<b>Beginning</b>	The LEA does not provide a schoolwide plan(s).
<b>Beginning</b>	The LEA has a schoolwide plan for each applicable grade span, BUT one or more of the required components is missing.
<b>Developing</b>	The LEA provides a schoolwide plan (one for each applicable grade span); the plan(s) include all of the required components; BUT any of the following occur: <ul style="list-style-type: none"><li>• There is limited evidence that the schoolwide plans are implemented with fidelity;</li><li>• The LEA does not align its professional development plan to the needs of the schoolwide plan(s); and/or</li><li>• There is limited evidence to show that the plans are intentionally used to promote and monitor student growth and achievement.</li></ul>
<b>Accomplished</b>	The LEA provides a schoolwide plan (one for each applicable grade span); the plan(s) include all of the required components; AND the LEA demonstrates that the schoolwide plans are implemented with fidelity.
<b>Exemplar</b>	The LEA meets the criteria in the "Accomplished" category AND any of the following: <ul style="list-style-type: none"><li>• Demonstrates the plans are intentionally used to promote and monitor student growth and achievement; AND/OR</li><li>• The schoolwide plan(s) aligns to the LEA's professional development plan.</li></ul>

## ~ Comprehensive Monitoring ~ Common Findings

- English Learner Programs (sec. 4, pgs. 38 - 40)
- Schoolwide Plans (sec. 6, pgs. 47-48)
- Out of Home Care Requirements (sec. 11, pgs. 61 - 63)
- Paraprofessional Requirements (sec. 16, pgs. 74-76)

## ~ Comprehensive Monitoring ~

# English Language Program Requirements

2.1b: Giving notice of and holding Regular and Ongoing meeting with Families of English Learners

4.1: English Language Programs - Entry & Exit Criteria  
*Requires that LEAs implement the state standardized procedure for entry and exit for English Learning Programs.*

4.2: English Language Programs - English Lang. Proficiency Standards  
*Requires that LEAs implementing Language Instruction programs are sufficiently staffed, resourced and based on sound theory (re: proven effective).*

## ~ Comprehensive Monitoring ~

# English Language Program Requirements

### Common Challenges:

- LEAs do not have procedures in place to identify/exit ELs
- LEAs do not have procedures for identifying the language needs for parents/caregivers
- The WIDA standards framework is new
- Lack of understanding of the role of an ELL teacher
- Implementing requirements is challenging for smaller LEAs

# ~ Comprehensive Monitoring ~ English Language Program Requirements

## *Resources:*

[WI's Guiding Beliefs for the Language Development of Multilingual Learners](#)

[English Learners Policy Handbook](#)

[Title III Website \(DPI\)](#)

## ~ Comprehensive Monitoring ~ SCHOOLWIDE PLANS

### Content of Schoolwide Plans:

#### **6.1. Required Documentation**

A schoolwide plan for one school implementing the schoolwide model in each applicable 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 processes to regularly monitor and revise the schoolwide plan.
- Coordination with federal, state, and local resources, services, and programs.

*Note: Schools could use their continuous improvement plans as Title I schoolwide plans, as long as those plans included the components listed above.*

# ~ Comprehensive Monitoring ~ SCHOOLWIDE PLANS

## Communication of Schoolwide Plans:

### 6.2. Required Documentation

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit.

### 6.2. Guiding Questions

1. Describe how the schoolwide plan(s) is made available to the LEA, the parents, and the public.  
*Examples of communications may include links to the schoolwide plan on the website, letters sent to parents, school board meeting minutes, etc.*
2. Describe how the schoolwide plan(s) is provided in an understandable format and in a language parents can understand.
3. How does your LEA determine that communication with parents is successful?
4. How has the school adjusted its schoolwide plan based on input and feedback from families?

# ~ Comprehensive Monitoring ~ SCHOOLWIDE PLANS

## Common Challenges:

- Lack of having an actual Schoolwide Plan that meets the compliance of all required components.
  - The schoolwide plan is not based on the results of a comprehensive needs assessment.
  - No strategies with ongoing parent engagement.
  - A process to regularly monitor and revise the schoolwide plan.
- Communication of the Schoolwide Plan is absent.

## **Resource:**

[Title I Schoolwide Programs \(DPI website\)](#)

# ~ Comprehensive Monitoring ~ Out of Home Care Requirements

## Transportation Procedures for Students in Out of Home Care.

### 11.1. Required Documentation

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

#### 11.1. Guiding Questions

1. How do the procedures ensure that transportation is provided, arranged, and funded for students in out-of-home care?
2. What system is in place to 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?

*[Note: While ESSA does not require that there be written procedures or policies for conducting a best interest determination, it is required that, if a change in school is being considered, a determination is made, in collaboration with the child welfare agency, before a student is enrolled in the resident school. See DPI's [web page regarding the best interest determination](#) for more information.]*

# ~ Comprehensive Monitoring ~ Out of Home Care Requirements

## Enrollment Procedures for Students in Out of Home Care:

### 11.2. Required Documentation

Written processes, procedures, and/or policies that ensure

- the immediate enrollment of students in out-of-home care, and
- The immediate contact of the school last attended to obtain relevant academic and other records.

### 11.2. 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?
2. Describe the processes, procedures, and/or policies to obtain relevant academic and other records.

# ~ Comprehensive Monitoring ~ Out of Home Care Requirements

## Common Challenges:

- There are no proactive written policies or procedures in place.
  - Rely on historical knowledge
  - Never encountered the scenario
  - Handle it on a “case by case” basis
- The plan needs to be developed with the LEA’s local Child Welfare Agency
  - Many LEAs have not made that connection

## Resources:

[Educational Stability for Students in Out of Home Care \(DPI Website\)](#)

[LEA and Child Welfare Points of Contact](#)

[Model Transportation Procedure](#)

# ~ Comprehensive Monitoring ~ Paraprofessional Requirements

## Paraprofessional Qualifications:

### 16.2.a. Required Documentation- Procedures

Procedures used to ensure that all new hires for paraprofessionals meet the ESEA requirements prior to employment.

### 16.2.a. Guiding Questions

1. Describe the process used to ensure that all instructional paraprofessionals meet the ESEA requirements prior to employment.
2. What is the onboarding and ongoing professional development offered to instructional paraprofessionals in your LEA?

# ~ Comprehensive Monitoring ~ Paraprofessional Requirements

## Common Challenges:

- Description of procedures used to ensure all paraprofessionals are highly qualified prior to the first day of employment, not present.
- A plan clearly stating the methods used to certify Title I Instructional Paraprofessionals.
- Credentials of all LEA Paraprofessionals not present.

## Resource:

[ESSA Title I Paraprofessional Hiring Requirements \(DPI Website\)](#)

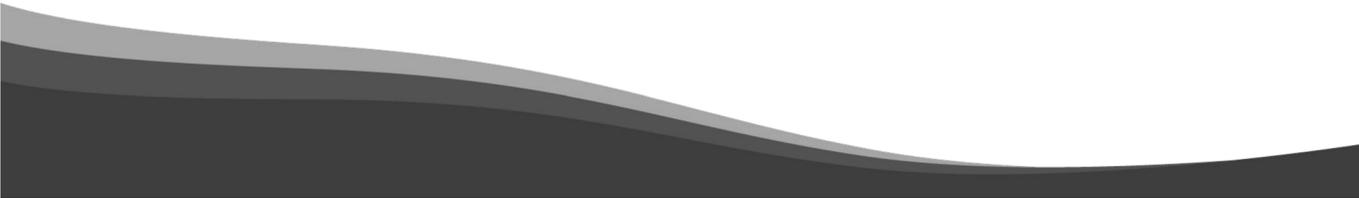
## ESEA Consolidated Monitoring



# ESEA Monitoring Best Practices

- Know the requirements and record keep accordingly, regardless of monitoring.
  - Don't reinvent the wheel!
    - Tap into current practices. Adapt and enhance, as needed for continued improvement & compliance.
  - Work as a team. Have all relevant expertise be a part of the monitoring process.
  - See the process as an opportunity for confirmation of the hard work of your LEA AND as an opportunity for growth.
- 

# ESEA Monitoring Best Practices

- Communicate!
    - If questions come up, communicate with DPI representatives before, during and after the visit.
  - Be prepared to answer the guiding questions outlined in the Monitoring Guide.
  - If there are findings, address in a timely manner so they are front of mind.
- 

# ESEA Monitoring

Questions?

Thank you!