

**Arkansas Federal Programs  
Programmatic and Financial Monitoring  
Process and Procedures  
2019-2020**



## I. Introduction

This Federal Programs Programmatic and Fiscal Monitoring Guide was developed to provide a comprehensive review of the federal programs monitoring processes and tools across federal granting authorities. The purpose of this tool is to provide uniform guidance for subrecipient monitoring. It is intended to be used by the Division of Elementary and Secondary Education (DESE) as a guide during subrecipient monitoring programs and should be used in conjunction with any Local Educational Agency (LEA) risk assessments. Risk assessments, in conjunction with this monitoring guide, provide LEAs and State Education Agencies (SEAs) determinations if grant purposes are being met, the identification of programs before monitoring or an audit, clarification of program requirements, and program expectations. Not all federal programs or items are applicable to all recipients.

Monitoring is the regular and systematic examination of a state's administration and implementation of a federal education grant, contract, or cooperative agreement. Monitoring the use of federal funds, in accordance with 2 C.F.R. §200.500, assures compliance with applicable federal requirements and ensures that all children have an equitable opportunity to obtain a high-quality education. Monitoring assesses the extent to which states provide leadership and guidance to LEAs and schools in the implementation of policies and procedures that comply with the statutes and regulations of all participating federal programs. The monitoring process is designed to assess the degree to which program requirements are being fulfilled. This is completed in two stages: pre-award and post-award. Pre-award process consists of:

- Determining LEA eligibility;
- Ensuring that the LEA maintains a current registration in the System for Award Management (SAM) at all times during which it has an active subaward(s); and
- Identifying the LEA Federal grant award information and applicable compliance requirements.

Post-award process ensures an opportunity for the DESE to provide technical assistance and guidance to LEAs in order to strengthen their program administration and improve the quality of programs and projects being implemented. Additionally, this process meets the requirement that the LEA permits the DESE and Legislative/private auditors access to records and financial statements as required. Additionally the DESE must:

- Verify the appropriate terms and conditions concerning closeout of the subaward;
- Evaluate each LEA's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring may include consideration of such factors as:

1. The LEA's prior experience with the same or similar subawards;
  2. A risk-based approach is used on all Federal programs. This risk-based approach must include consideration of current and prior audit experience, oversight by Federal agencies and pass-through entities, and the inherent risk of the Federal program.
  3. The subrecipient has new personnel or new or substantially changed systems; and
  4. The monitoring of the activities as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved.
- DESE monitoring of the LEA must include:
    1. Reviewing financial and programmatic reports required by the pass-through entity;
    2. Ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means; and
    3. Issuing a management decision for audit findings pertaining to the Federal award provided to the subrecipient from the pass-through entity as required by 2 C.F.R. § 200.521 Management decision.
  - Depending upon the pass-through entity's assessment of risk posed by the subrecipient the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals:
    1. Providing subrecipients with training and technical assistance on program-related matters;
    2. Performing on-site reviews of the LEA's program operations;
    3. Arranging for agreed-upon engagements as described in 2 C.F.R. § 200.425 Audit services;
    4. Verify that every subrecipient expends Federal awards during the respective fiscal year or period of performance;
    5. Consider whether the results of the LEA's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records; and
    6. Consider taking enforcement action against noncompliant subrecipients as described in 2 C.F.R. § 200.338

## Remedies for Noncompliance.

- Additional risk factors may be identified by DESE (Examples: LEA identified in Fiscal Distress, LEA under State control, etc.)

## II. Tiered Monitoring Process and Procedures

Districts will be identified to participate in DESE's monitoring process based on relative programmatic and/or fiscal risk(s). DESE's monitoring process will leverage a collaborative, cross-program approach to provide support to districts. These supports will be designed to integrate programmatic and fiscal data to address areas in need of improvement. The monitoring process is designed to assess the degree to which program requirements are being fulfilled so the SEA can make recommendations when appropriate. In addition, it provides an opportunity for the SEA to provide technical assistance and guidance to LEAs in order to strengthen their program administration and improve the quality of programs and projects being implemented. As a pass-through agency for federal funds, DESE is required to conduct compliance reviews to ensure that subgrants of federal program funds to LEAs are used in accordance with the purposes of the authorizing statute (2 C.F.R. § 200.331). The SEA will complete a yearly risk analysis for each LEA to determine their level of risk. LEAs will have an opportunity to receive guidance and technical assistance through the tiered monitoring process. From this process, the LEA will be informed of the grant status by notice of substantial compliance, request for clarification of information, or additional data as needed for review.

### **Tier 1 - Desk Monitoring Process**

Desk monitoring begins an annual Tier 1 review of federal grant applications, including budgets, for each of the federally funded educational entitlement programs. LEAs submit grant applications and accompanying documents to the DESE through Indistar. Based on this desk monitoring, LEAs will be notified when a grant application is substantially compliant or a request will be made to the LEA for additional information. This request will be made in order to achieve clarifying information regarding portions of the application or budget and to reveal the possibility of a potential area of non-compliance. LEAs will have an opportunity to receive guidance and technical assistance.

### **Tier 2 - Request Additional Information**

The LEA will be notified of content within the program description and/or budgets which do not meet the necessary standards to achieve substantial compliance. The LEA will be asked to address the items and submit the necessary additional information. These newly submitted documents will once again be desk monitored in an effort to ascertain the LEA's compliance status. It is recognized, and expected, that the LEA may require technical assistance.

### **Tier 3 - Deeper Dive into Data or Evidence**

In the event that a deeper dive becomes necessary (identified risk, request, and sampling), the LEA will be notified in writing of the specific circumstances and the recommended remedies required to move the grant to a point of substantial compliance. This may require the submission of additional documentation from the LEA, more intensive technical assistance, a site visit by DESE staff, or other remedies determined in consultation with the LEA. Final determination will be made after October 1 Cycle II submission. Data collected from the Statewide Information System will identify some of the risk(s) (For example: New superintendent, new business manager, etc.).

### **Tier 4 - On-Site Monitoring Process**

LEAs will be visited based on identified risks, a sampling or predetermined cycle, difficulty resolving issues during desk monitoring, or a request from the Superintendent or Commissioner of DESE. LEAs will be evaluated as higher risk or lower risk to determine the need for on-site monitoring. Generally, new LEAs would require closer monitoring. For existing LEAs, based on results of during-the-award monitoring and LEA audits, a LEA may warrant closer monitoring (e.g., if the LEA has (1) a history of non-compliance as an LEA, (2) new personnel, or (3) new or substantially changed systems). Evaluation of LEA risk also may take into consideration the extent of Federal monitoring of LEA entities that also are recipients of prime Federal awards.

### **During On-Site Review:**

**Entrance Conference:** An entrance conference is held with the superintendent and other district personnel. The meeting acquaints LEA staff with the DESE team and provides an opportunity to familiarize district staff with the purpose and goals of the visit.

**Review:** Interviews with appropriate program personnel or staff members and a review of additional documentation gathered is conducted on-site. This may also include interviews with non-public school staff, multi-district consortium members, parents and/or other stakeholders, if issues are noted during the site visit that warrant further investigation. The DESE Monitoring Team will utilize the monitoring indicators to interview the LEA during the on-site monitoring review.

**Exit Conference:** The monitoring team will hold an exit conference with the superintendent and other district personnel. The DESE monitoring team will summarize the monitoring activities, the potential findings and the timeline for developing the monitoring report.

Within ten (10) business days of the exit conference, the monitoring report will be issued to the superintendent. The LEA will have ten (10) business days to complete and submit the necessary documentation listed in the corrective actions. Documentation/evidence received from the LEA during this time will be reviewed for compliance. If all documentation is deemed complete and compliant, a final compliance letter will be issued within thirty (30) business days of the exit conference. DESE reserves the right to alter the timeline to fully collect necessary data. The LEA will be notified in writing if an extended timeline is required.

An LEA that does not respond to the report within the established timeline or fails to comply, the Federal awarding agency or pass-through entity may take one or more of the following actions, as appropriate in the circumstances (2 C.F.R. § 200.338 Remedies for Non-compliance):

- a. Temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or pass-through entity.
- b. Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
- c. Wholly or partly suspend or terminate the Federal award.
- d. Initiate suspension or debarment proceedings as authorized under 2 C.F.R. §180 et seq. and Federal awarding agency regulations (or in the case of a pass-through entity, recommend such a proceeding be initiated by a Federal awarding agency).
- e. Withhold further Federal awards for the project or program.
- f. Take other remedies that may be legally available which may include a designated level of fiscal distress.

Upon taking any remedy for non-compliance, the Federal awarding agency must provide the non-Federal entity an opportunity to object and provide information and documentation challenging the suspension or termination action, in accordance with written processes and procedures published by the Federal awarding agency. The Federal awarding agency or pass-through entity must comply with any requirements for hearings, appeals or other administrative proceedings to which the non-Federal entity is entitled under any statute or regulation applicable to the action involved. (2 C.F.R. § 200.341 Opportunities to object, hearings and appeals)

### III. Risk Assessment

A risk assessment will be completed annually to assist DESE in identifying districts which may be at risk of not being in compliance with state or federal laws or requirements. Evidence for the risk assessment will be collected throughout the school year and scores updated to reflect new information. All LEAs earning 50 points or more on the risk assessment will be considered high risk for an onsite monitoring.

Risk Criteria	Value	Points Earned
District uses a private auditor or had an audit finding in previous year	30	
District is receiving Level 4 or Level 5 Support	20	
District or school has a Probation or Citation during previous year	20	
District is identified as high risk by any DESE unit or division	20	
District has 40% or more students in need of support in reading in previous state assessment	15	
District has been identified as fiscal distress or early intervention	15	
District has unspent federal grant funds that were required to be returned to DESE	10	
District has a new bookkeeper	5	
District has a new superintendent	5	
District or school was late in submitting a budget or required report	5	
District has not participated in an onsite monitoring in the last five (5) years	5	
<b>TOTAL POINTS</b>	<b>150</b>	

## **IV. Grant Descriptions**

**Title I, Part A - Improving the Academic Achievement of the Disadvantaged** - 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. (20 U.S.C. §6301)

**Title I, Part C - Education of Migratory Children** - The purposes of this part are as follows: (1) to assist States in supporting high-quality and comprehensive educational programs and services during the school year and, as applicable, during summer or intersession periods, that address the unique educational needs of migratory children. (2) To ensure that migratory children who move among the States are not penalized in any manner by disparities among the States in curriculum, graduation requirements, and challenging State academic standards. (3) To ensure that migratory children receive full and appropriate opportunities to meet the same challenging State academic standards that all children are expected to meet. (4) To help migratory children overcome educational disruption, cultural and language barriers, social isolation, various health-related problems, and other factors that inhibit the ability of such children to succeed in school. (5) To help migratory children benefit from State and local systemic reforms. Title I, Part C, Section 1301, 20 U.S.C. §6391 et seq.

**Title I, Part D - Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent or At-Risk** - (1) To improve educational services for children and youth in local, tribal, and state institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging state academic standards that all children in the state are expected to meet (2) to provide such children and youth with the services needed to make a successful transition from institutionalization to further schooling or employment; and (3) to prevent at-risk youth from dropping out of school, and to provide dropouts, and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education. Title I, Part D, Section 1401, 20 U.S.C. §§6421-6472.

**Title II, Part A - Supporting Effective Instruction** - The purpose of this title is to provide grants to State educational agencies and subgrants to local educational agencies to (1) increase student achievement consistent with the challenging State academic standards; (2) improve the quality and effectiveness of teachers, principals, and other school leaders; (3) increase the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and (4) provide low-income and minority students greater access to effective teachers, principals, and other school leaders. Title II, Part A, Section 2001, 20 U.S.C. §6611 et seq.

**Title III, Part A - Language Instruction for Limited English Proficient and Immigrant Students** - The purposes of this part are intended (1) to help ensure that English learners, including immigrant children and youth, attain English proficiency and develop high levels of academic achievement in English; (2) to assist all English learners, including immigrant children and youth, to achieve at high levels in academic subjects so that all English learners can meet the same challenging State academic standards that all children are expected to meet; (3) to assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, local educational agencies, and schools in establishing, implementing, and sustaining effective language instruction educational programs designed to assist in teaching English learners, including immigrant children and youth; (4) to assist teachers (including preschool teachers), principals and other school leaders, State educational agencies, and local educational agencies to develop and enhance their capacity to provide effective instructional programs designed to prepare English learners, including immigrant children and youth, to enter all-English instructional settings; and (5) to promote parental, family, and community participation in language instruction educational programs for the parents, families, and communities of English learners. Title III, Part A, Section 3102, 20 U.S.C. §§6812.

**Recent Immigrant Grant** - The purpose of this part is to provide enhanced instructional opportunities for immigrant children and youth, which may include - (1) family literacy, parent and family outreach, and training activities designed to assist parents and families to become active participants in the education of their children; (2) recruitment of, and support for, personnel, including teachers and paraprofessionals who have been specifically trained, or are being trained, to provide services to immigrant children and youth; (3) provision of tutorials, mentoring, and academic or career counseling for immigrant children and youth; (4) identification, development, and acquisition of curricular materials, educational software, and technologies to be used in the program carried out with awarded funds; (5) basic instructional services that are directly attributable to the presence of immigrant children and youth in the local educational agency involved, including the payment of costs of providing additional classroom supplies, costs of transportation, or such other costs as are directly attributable to such additional basic instructional services; (6) other instructional services that are designed to assist immigrant children and youth to achieve in elementary schools and secondary schools in the United States, such as programs of introduction to the educational system and civics education; and (7) activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents and families of immigrant children and youth by offering comprehensive community services. Title III, Section 3115(e)(1)(A-G), 20 U.S.C. §6825(e)(1).

**Title IV, Part A - Student Support and Academic Enrichment (SSAE)** - The purpose of this subpart is to improve student's academic achievement by increasing the capacity of States, local educational agencies, schools, and local communities to: 1) provide all students with access to a well-rounded education, 2) improve school conditions for student learning, and 3) improve the use of technology in order to improve the academic achievement and digital literacy of all students. Title IV, Part A Section 4101, 20 U.S.C. §7111.

**Title IV, Part B - 21st Century Community Learning Centers (21st CCLC)** - The purpose of this part is to provide opportunities for communities to establish or expand activities in community learning centers that (1) provide opportunities for academic enrichment, including providing tutorial services to help students, particularly students who attend low-performing schools, to meet the challenging State academic standards; (2) offer students a broad array of additional services, programs, and activities, such as youth development activities, service learning, nutrition and health education, drug and violence prevention programs, counseling programs, arts, music, physical fitness and wellness programs, technology education programs, financial literacy programs, environmental literacy programs, mathematics, science, career and technical programs, internship or apprenticeship programs, and other ties to an in-demand industry sector or occupation for high school students that are designed to reinforce and complement the regular academic program of participating students; and (3) offer families of students served by community learning centers opportunities for active and meaningful engagement in their children's education, including opportunities for literacy and related educational development. Title IV, Part B Section 4201, 20 U.S.C. §7171.

**Title V, Part B - Rural Education Achievement Program** - The purpose of this part is to address the unique needs of rural school districts that frequently: (1) lack the personnel and resources needed to compete effectively for Federal competitive grants; and (2) receive formula grant allocations in amounts too small to be effective in meeting their intended purposes. Title V, Part B Section 5201 and 5202, 20 U.S.C. §§7341 and 7341a. (Title V, Part B is not included within the on-site monitoring tool. This information is obtained during the desk monitoring process.)

**Title IX, Part A of the McKinney-Vento Homeless Assistance Act** – This Act guarantees educational rights and supports for students experiencing homelessness, and seeks to remove any barriers these students may face in succeeding in school. The McKinney-Vento Act is designed to address the challenges that homeless children and youths have faced in enrolling, attending, and succeeding in school. 42 U.S.C. § 11431 et seq.

**Overarching Programatic Requirements**  
**Title I, Part A; Title I, Part D; Title II, Part A; Title III, Part A; Title IV, Part A; Title V, Part B**

<b>Monitoring Indicators</b>		<b>Acceptable LEA Evidences</b>
1	LEA completes an <b><u>annual comprehensive needs assessment</u></b> .	Provide evidence that each school completed an annual comprehensive needs assessment and that the district considered these needs when prioritizing how funds will be utilized.
2	LEA maintains <b><u>security</u></b> that ensures all applicable technology, networks, passwords and student data is safe, secure and password protected. Section 8545(a)(1-4), 20 U.S.C. §7925	Provide evidence of the LEA's information technology security plan and/or Disaster Recovery Plan which includes protection for student privacy.
3	<b><u>Equitable Services consultation</u></b> process and meetings between the LEA and private school officials that occur (excluding Title V, Part B): a. prior to the LEA making any decisions regarding the involvement in participating Title programs of eligible private school students, teachers, and families. b. throughout the implementation and assessment of the participating Title programs and services for private school students. Sections 1117(b)(1)(A-L), 8501(c)(1)(A-H); 20 U.S.C. §6320	Affirmation of Consultation and Intent to Participate will be verified in Indistar.  Provide evidence of letters or phone logs to private schools documenting contact efforts.
4	The LEA ensures that <b><u>inventory controls</u></b> are in place.  The LEA ensure that private schools are offered the same monitoring and inventory controls for Federally-owned property as public school sites. Uniform Guidance: 2 C.F.R. §§200.312(a) and 200.313(2)(A)	Provide an up-to-date equipment inventory listing for any equipment held at the public schools and private schools.  Provide evidence that an inventory of these items was performed as least once every two years.
5	LEAs maintains and <b><u>retains all required records</u></b> that fully show the amount of federal funds, how the LEA used the funds, the total costs of Federally supported projects, the share of costs provided from other sources, records to show compliance with program requirements, and any other records needed to facilitate an effective audit. The LEA must also take reasonable measures to safeguard and protect Personally Identifiable Information (PII). Uniform Guidance 2 C.F.R. §200.303(e); 2 C.F.R. §200.333; 2 C.F.R. §200.336(a); EDGAR 34 C.F.R. §§76.730-731	Provide evidence of a district records retention policy which states that all Federal Program records will be maintained for a minimum of three years from the expiration of grant funds.  Provide evidence that required records are retained and easily accessible.

<p>6</p>	<p>LEA must ensure that site <b>allocations</b> are made in accordance with applicable statutory requirements. Section 20 U.S.C. §6333(a)(2)(A)</p> <p>Federal written procedures are in place. 2 C.F.R. §200.302(b)(7)</p> <p>Property and Equipment are inventoried and monitored. 2 C.F.R. §200.313(d)(1)</p> <p>Personnel are verified. 2 C.F.R. §200.430(i)</p>	<p>Provide written policies and procedures for the following in accordance with Uniform Grant Guidance:</p> <ol style="list-style-type: none"> <li>1. Financial Management System 2 C.F.R. §200.302(b)(1-4)</li> <li>2. Cash Management System 2 C.F.R. §200.302(6)</li> <li>3. Allowability of Costs 2 C.F.R. §§200.302(6);200.403-405</li> <li>4. Procurement 2 C.F.R. §200.318(a)</li> <li>5. Conflict of Interest 2 C.F.R. § 200.318(c)(1)</li> <li>6. Method of Conducting Technical Evaluations of Proposal 2 C.F.R. §200.320(d)(3)</li> <li>7. Travel 2 C.F.R. §200.474(b)</li> <li>8. Property 2 C.F.R. § 200.313</li> </ol> <p>Provide an updated inventory listing for each Federal Program and verify adequate tagging or labeling.</p> <p>Provide a list of employees paid from Federal Programs, time sheets, and contracts.</p>
<p>7</p>	<p><b>Maintenance of Effort and Comparability:</b> Each LEA shall have either the combined fiscal effort per student or the aggregate expenditures of the LEA and the State with respect to the provision of free public education by the agency for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year. Section 8521; 20 U.S.C. §7901.</p> <p>Each LEA shall use State and local funds in schools served under this part to provide services that, taken as a whole, are at least comparable to services in schools that are not receiving funds under this part. Section 1118(c)(1)(A); 20 U.S.C. §6318.</p>	<p>Provide a written policy or procedure. In cases where Title I schools are not comparable, documentation showing adjustments to the allocation of resources that LEA made to ensure that Title I and non-Title I schools are comparable is required.</p>

8	<b>Supplement not Supplant:</b> The LEA must ensure that Federal program funds are used to supplement, not supplant State and local funds. ESSA §1114(a)(3)(B) (20 U.S.C. §6318); ESSA §3115(g) (20 U.S.C. §6825)	Title I, Part A (only) provide written methodology documenting distribution of State and local funds showing evidence that methodology was implemented as submitted.  All of Federal Programs provide evidence that funds were used to supplement only.
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**Title I, Part A**  
**Improving the Academic Achievement of the Disadvantaged**

<b>Monitoring Indicators</b>		<b>Acceptable LEA Evidences</b>
1	LEA <b>Title I committee</b> selects a diverse group of members. Section 1112(a)(1)(A); 20 U.S.C.§6312.	Provide a list of names of committee members and their titles.
2	Title I <b>Targeted Assistance Programs</b> Student Eligibility Criteria Section 1115(c); 20 U.S.C.§6315.	Provide evidence that LEA has followed criteria for Targeted Assistance Program Student Eligibility.
3	<b>Application</b> has been approved by ADE to include budget, activities, equity plan, schoolwide programs and/or targeted assistance programs, services for homeless students, and collaboration to ensure foster the educational stability of children in foster care.	Provide evidence that the LEA application has been implemented.
<b>Parent and Family Engagement, Title I, Part A</b>		
1	LEA ensures the Title I school <b>Parent and Family Engagement Plan</b> has been implemented and that each school has carried out the six requirements to build capacity for involvement. Sections 1116 (e)(1-5,14); 20 U.S.C. §6318.	Provide agendas, sign-in sheets, minutes, notification of parent meetings and signed documents that verify implementation of the Parent and Family Engagement Plan.
2	Parent and Family Engagement Plan was <b>developed jointly with parents</b> , agreed upon and disseminated to parents. Sections 1116(a)(2)(A), 1116(b)(1); 20 U.S.C. §6318.  The LEA's Parent and Family Engagement Plan includes strategies for the inclusion of parents of private school children. Sections 1116,1117(a)(1)(B); 20 U.S.C. §§6318 and 6320.	Provide Parent and Family Engagement committee meeting sign-in sheets, that clearly identify parents in attendance, to verify that their Parent and Family Engagement Plans were developed jointly with and agreed on with parents. Provide examples of how plans were disseminated.  Provide evidence of Parent and Family Engagement Plan for the inclusion of parents of private school children. Provide strategies that were used to support private school parents and children.
3	At the beginning of each school year, the LEA notifies the parents of each student about the <b>right to request</b> information regarding the professional qualifications of the student's classroom teachers and paraprofessionals. Section 1112(e)(1)(A-B); 20 U.S.C. §6312  At the beginning of the year, parents of participating students are informed that they have a <b>right to request regular meetings</b> to help formulate suggestions and participate in the decisions made relating to the education of their children. Section 1116(c)(4)(C); 20 U.S.C.§6318.	Provide evidence of Parents Right to Know letter verifying that they were informed and received timely notification if student has been assigned to or has been taught four or more consecutive weeks 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.  Provide evidence verifying that the Title I school informed parents of students receiving Title I services that they had a right to ask for regular meetings to help formulate suggestions and participate in the decisions made about the education of their children.

4	<p>LEA ensures that an <b>annual evaluation</b> of the effectiveness of the Parent and Family Engagement Policy/Plan and activities have been completed for participating schools. Section 1116(a)(2)(D)(i-iii); 20 U.S.C. §6318.</p> <p>LEA should use the <b>annual evaluation findings</b> to help improve the Parent and Family Engagement efforts. Section 1116 (a)(2)(E); 20 U.S.C. §6318.</p>	<p>Provide evidence of the most recent annual evaluation form for the Parent and Family Engagement Policy/Plan for each school in the district.</p> <p>The evaluation must include the following:</p> <ul style="list-style-type: none"> <li>a. identifies barriers to greater participation (with particular attention to parents who are economic disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background),</li> <li>b. identifies the needs of parents and family members to assist with the learning of their children, including engaging with school personnel and teachers,</li> <li>c. identifies strategies to support successful school and family interactions.</li> </ul> <p>Provide evidence of written documentation on how the findings of the annual evaluation are used to design evidence-based strategies for more effective parental involvement, and to revise, if necessary, the parent and family engagement policies described in this section.</p>
5	<p>Parents of students receiving Title I services receive <b>information about the school's Title I Program.</b> Sections 1116; 20 U.S.C. §6318</p> <p>Parent notifications and information to the parents in a language that is understandable to the parents. Section 1116; 20 U.S.C. §6318.</p> <p>Title I school <b>School-Parent Compact</b> to be discussed and agreed upon by the school, parent and the student. It should outline 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 and is jointly develop with parents for all children receiving Title I services. Section 1116 (d)(1), (d)(2)(A-D); 20 U.S.C. §6318</p> <p>Parents of students receiving Title I services receive information about the school's Title I Program. Section 1116 (c)(4)(B-C); 20 U.S.C. §6318.</p>	<p>Provide evidence of School Annual Title I Meeting's agenda, sign-in sheets and minutes to verify that each Title I School does the following:</p> <ul style="list-style-type: none"> <li>a. Conduct an School Annual Title I Meeting to inform parents of participating students about the school's Title I Program.</li> <li>b. Provide a description and explanation of the curriculum in use at the school.</li> <li>c. Provide information about the forms of academic assessment used to measure student progress.</li> <li>d. Provide information about the achievement levels of the challenging State academic standards.</li> </ul> <p>Provide examples of translated documents. Examples may include Parent Right to Know letter, timely notice letter, school parent compact, School Annual Title I meeting invitation, all correspondence to EL parents.</p> <p>Provide evidence of the School-Parent Compact, that has been discussed and agreed upon by all stakeholders, to verify that each Title I school has developed a School-Parent Compact.</p> <p>Provide documents that verify that parent provided input into how the funds set-aside for Parent and Family Engagement were spent. (meeting agenda, meeting minutes, sign-in sheets, surveys).</p>
<b>Paraprofessionals, Title I, Part A</b>		
1	<p>LEA ensures that paraprofessionals are <b>highly qualified.</b> Section 1112(c)(6); 20 U.S.C. §6312.</p>	<p>Provide highly qualified documentation.</p>

2	The LEA provides <b>professional development</b> and other activities for teachers, paraprofessionals, and other school personnel to improve instruction and use of data from academic assessments. Section 1114(b)(7)(iii)(IV); 20 U.S.C. §6314.	Provide professional development plan.  Provide sign-in sheets, agendas, individualized professional development plans, etc.
<b>Neglected, Title I, Part A</b>		
1	LEA provides <b>evaluation</b> for Neglected, Title I, Part D. Section 1431; 20 U.S.C. §6471.	Provide evidence of a process for ongoing monitoring of the program effectiveness using evaluation results from the curriculum model or instructional program in use. Examples may include assessments which are aligned to the curriculum and disaggregated data used to guide instruction (charts, graphs etc.).
2	LEA provides <b>professional development</b> opportunities for staff on Neglected, Title I, Part A. Section 1414(c)(10); 20 U.S.C. §6314.	Provide sign-in sheets, agendas, and minutes of professional development opportunities specific to Title I, Part A Neglected program.

**1003 Grant, Title I, Part A**

1	<u>Application</u> has been approved by ADE to include budget, activities, and evaluation of all components.	Provide evidence that the LEA application has been implemented.
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**Title I, Part C  
Education of Migratory Children**

	<b>Monitoring Indicators</b>	<b>Acceptable LEA Evidences</b>
1	<u>Application</u> has been approved by ADE to include budget, activities, inventory, required reports and evaluation of all components.	Provide evidence that the LEA application has been implemented.

**Title I, Part D  
Delinquent**

<b>Monitoring Indicators</b>		<b>Acceptable LEA Evidences</b>
1	LEA provides <b>instruction</b> that is aligned with state's academic standards and accountability system to delinquent children and youth. Section 1414 (a)(1)(B)(C); 20 U.S.C. §6314	Provide a job description for the transition coordinator (if applicable).  Provide policies, procedures, and samples of instructional materials that indicate students are held to the same standards and accountability system required of all students.
2	Services provided to assist in the <b>transition</b> of delinquent children and youth back to the school or workforce environment. Section 1418(a)(2) ; 20 U.S.C. §6438	Provide policies and procedures that the transition of students to regular public school programming or workforce situations is being conducted.  Verify the appropriate use of 15%-30% fund reservation.  Examples may include a list of transition programs, students under age 20 receiving a diploma, and partnerships facilitating technical education and career education.
3	LEA has a <b>dropout prevention program</b> that targets at-risk or delinquent children and youth. Section 1414(c)(8); 20 U.S.C. §6314.	Provide documentation that the dropout prevention program has been shared with parents/guardians.  Provide sign-in sheets and agendas of professional development regarding dropout prevention.  Provide samples of the instructional materials used to facilitate dropout prevention.
4	LEA has procedures for <b>monitoring delinquent program funds.</b>	Provide job descriptions and list of employees paid with Part D Funds.  Provide time records for all employees paid with Part D Funds.  Provide a list of all equipment inventoried.  Provide invoices, purchase orders, etc.
5	LEA <b>collects data</b> on children and youth after they are released. Sections 1426(2); 20 U.S.C. §6456.	Provide written procedures for student data collection which must include: 1. The number of children and youth returning or to school. 2. A list of those students attaining a regular high school diploma or its recognized equivalent. 3. A list of students that have attained employment after such children and youth are released.

6	Procedures utilized to meet the <b>needs of delinquent students</b> that have a disability, in order to meet an existing Individualized Educational Program (IEP) requirements. Section 1414(c)(15)(A)(B); 20 U.S.C. §6314.	Provide sample documentation of evidence of modifications.  Provide records related to parent meetings regarding modifications.  Provide evidence of all policies used by the agency and disseminated to parents regarding programming for students with disabilities.
7	<b>Application</b> has been approved by ADE to include budget, activities, transitional plan, third party contracts/agreements, and evaluation of all components.	Provide evidence that the LEA application has been implemented.

**Title II, Part A**  
**Preparing, Training, and Recruiting High-Quality Teachers, Principals, and Other School Leaders**

	<b>Monitoring Indicators</b>	<b>Acceptable LEA Evidences</b>
1	<p>If applicable, describe how <b>Class-Size Reduction</b> (CSR) needs are determined. Section 2103(b)(3)(D); 20 U.S.C. §6613.</p>	<p>Provide the written methodology used to determine Class-Size reduction. (See Commissioner's Memo COM-19-106)</p>
2	<p><b>Professional development</b> activities the LEA selects meet the purpose of Title II, Part A by containing the following:</p> <p>a. increases student achievement consistent with the challenging State academic standards; Section 2103(b)(3)(E); 20 U.S.C. §6613.</p> <p>b. improves the quality and effectiveness of teachers, principals, and other school leaders; Section 2103(b)(3)(E); 20 U.S.C. §6613.</p> <p>c. increases the number of teachers, principals, and other school leaders who are effective in improving student academic achievement in schools; and Section 2103(b)(3)(E); 20 U.S.C. §6613.</p> <p>d. provides low-income and minority students greater access to effective teachers, principals, and other school leaders. Section 2103(b)(3)(B); 20 U.S.C. §6613.</p> <p>Professional development activities meet the purpose of Title II, Part A by addressing the learning needs of all students, including children with disabilities, English learners and gifted and talented students. Sections 2103(b)(3)(F), 2103(b)(3)(J); 20 U.S.C. §6613.</p>	<p>Provide documentation of professional development needs based on evidenced-based practices. (See Commissioner's Memo COM-19-106)</p> <p>Provide evidence of how data driven professional development is used to decrease the achievement gap between low and higher performing students.</p> <p>Provided a list of teachers receiving incentives and type of incentives. Section 2103 (b)(B)(3)(ii); 20 U.S.C. §6613.</p> <p>Provide evidence of how data driven professional development is used to meet the learning needs of children with disabilities, English learners, and gifted and talented students.</p>
3	<p>The LEA provides <b>meaningful consultation</b> with teachers, principals, other school leaders, paraprofessionals, support personnel, parents, family, community partners, and stakeholders Sections 2102(b)(3); 20 U.S.C. §6612.</p> <p>The LEA consults with private schools within district boundaries to provide resources for professional development to the private school teachers if the private school chooses to participate. Section 8501; 20 U.S.C. §7881.</p>	<p>Provide documentation of specific Title II, Part A consultation criteria.</p> <p>Provide sign in sheets, agendas, and minutes of consultation including stakeholder representation.</p>
4	<p><b>Application</b> has been approved by ADE to include budget, activities, private school consultation, and evaluation of all components.</p>	<p>Provide evidence that the LEA application has been implemented.</p>

**Title III, Part A**  
**Language Instruction for English Learners and Immigrant Students**

	<b>Monitoring Indicators</b>	<b>Acceptable LEA Evidence</b>
1	Title III funds are used as a <b>supplement</b> for programs for English Learners and immigrant children and youth and in no case to supplant. Section 3115(g); 20 U.S.C. §6825.	Provide expenditure reports, classroom schedules/rosters, invoices, purchase orders.  Provide documentation that supports that Title III activities were used for supplemental activities and not to support a district's general operating budget or programs previously funded with local or other operating funds.
2	LEA has <b>identified English Learners</b> for participation as required by Section 3113(b)(2); 20 U.S.C. §6821.	Provide evidence of completed Home Language Usage Surveys and assistance to parents, who are completing the Home Language Usage Surveys, on understanding the purpose of the Home Language Usage Surveys.  Provide a verified list of eligible English Learners (EL).  Provide evidence of administering ELPA21 Screener to appropriate students (Language Minority Students, newly enrolled, etc.) Provide a list of all K-12 students with students' home language indicated.
3	LEA <b>annually assesses the English proficiency of all ELs</b> in grades K-12. Section 1111(b)(2)(G)(i); 20 U.S.C. §6311.	Provide: 1. Documentation of how many EL students were not assessed and the reason for not testing. 2. Evidence that all EL students, including those in other programs such as Special Education, are annually assessed with ELPA21 assessment. 3. Documentation that EL parents are informed of the ELPA21 summative assessment testing requirements and results for all EL students.
4	LEA ensures that the <b>required language instruction educational program</b> (LIEP) and the supplemental language instruction educational programs focus on the development of English language proficiency and student academic attainment of the state content standards. Section 3115(c)(1)(A-B); 20 U.S.C. §6825.	Provide: 1. District's plan for implementation of State Academic Standards including the ELP standards. 2. The process of developing English Language Proficiency (ELP) content curriculum that integrates components of ELP standards. 3. Evidence of ELP Standards being available to staff. (Examples may include sign-in sheets from ELP standards training) 4. Documentation of professional development related specifically to ELs that equipped educators with the skills necessary to implement the required and supplemental LIEP. 5. Documentation of classroom observation feedback, from an administrator trained on ESL concepts, on how teachers meet the needs of EL students.

5	LEA ensures that they provide effective <b>professional development</b> 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. Section 3115(c)(2)(A-D)	Provide a professional development plan indicating how varying audiences are trained and sign-in sheets/agendas from the trainings.
6	The LEA ensures that ELs are included in all state content and ELP <b>assessments</b> . Section 1111(b)(2)(I)(II)(ii); 20 U.S.C. §6311.	Provide evidence that all English Learners were tested.
7	<b>Individual Learning Plans by the Language Proficiency and Assessment Committee</b> (ILP/LPAC) have been created for all English Learners. All teachers serving English Learners have received a copy of the student's ILP and it is being implemented on a daily basis to increase English Proficiency. Section 3115(c)(1); 20 U.S.C. §6825.	Provide: 1. Student ILP/LPAC Forms. 2. Signatures of Administrators, Classroom Teachers, ESOL Coordinator and others on the LPAC, if applicable.
8	LEAs <b>monitor</b> students that meet the exit criteria. Section 3113(b)(3)(B); 20 U.S.C. §6823.	Provide: 1. List of former EL students currently being monitored. 2. Monitoring forms/documentation of students in monitoring
9	LEA has an effective means of <b>parent outreach</b> to EL parents (programs, activities, training, and family literacy). The district has evidence that EL parents are involved stakeholders. Sections 3115(c)(3)(A), 3116(b)(3); 20 U.S.C. §§6825 and 6826.	Provide evidence of how the LEA promotes parent, family, and community engagement in the education of English Learners. Examples could include calendar of events, topics, and sign-in sheets.
10	<b>Application</b> has been approved by ADE to include budget, activities, programs, parent and community engagement, and evaluation of all components.	Provide evidence that the LEA application has been implemented.

**Recent Immigrant Grant  
Immigrant Children and Youth Grant**

	<b>Monitoring Indicators</b>	<b>Acceptable LEA Evidence</b>
1	LEA shall use funds to pay for activities that provide <b><u>enhanced instructional opportunities</u></b> for immigrant children and youth, Section 3115(e)(1)(A-G); 20 U.S.C. §6825.	<p>Provide documentation of chosen activities such as schedules, sign-in sheets, purchase orders (when applicable) from the list below:</p> <ol style="list-style-type: none"> <li>1. Family literacy, parent and family outreach, and training activities designed to assist parents and families to become active participants in the education of their children;</li> <li>2. Recruitment of, and support for, personnel, including teachers and paraprofessionals who have been specifically trained, or are being trained, to provide services to immigrant children and youth;</li> <li>3. Provision of tutorials, mentoring, and academic or career counseling for immigrant children and youth;</li> <li>4. Identification, development, and acquisition of curricular materials, educational software, and technologies to be used in the program carried out with awarded funds</li> <li>5. Basic instructional services that are directly attributable to the presence of immigrant children and youth in the local educational agency involved, including the payment of costs of providing additional classroom supplies, costs of transportation, or such other costs as are directly attributable to such additional basic instructional services;</li> <li>6. Other instructional services that are designed to assist immigrant children and youth to achieve in elementary schools and secondary schools in the United States, such as programs of introduction to the educational system and civics education;</li> <li>7. Activities, coordinated with community-based organizations, institutions of higher education, private sector entities, or other entities with expertise in working with immigrants, to assist parents and families of immigrant children and youth by offering comprehensive community services.</li> </ol>

**Title IV, Part A**  
**Student Support and Academic Enrichment**

<b>Monitoring Indicators</b>		<b>Acceptable LEA Evidence</b>
1	LEA shall develop its application through <b>consultation</b> with parents, teachers, and other stakeholders with demonstrated expertise in programs and activities designed to meet the purpose of this subpart. Section 4106(c); 20 U.S.C. §7116.	Provide evidence of dated agendas, minutes, sign-in sheets, notes of consultation with parents, teachers, principals, other school leaders, specialized instructional support personnel, students, community-based organizations, and local government representatives.
2	<b>Application</b> has been approved by ADE to include budget, activities, programs, parent and community engagement, internet safety policy, private school consultation, and evaluation of all components.	Provide evidence that the LEA application has been implemented.

**Title IV, Part B**  
**21st Century Community Learning Centers**

<b>Monitoring Indicators</b>		<b>Acceptable LEA Evidence</b>
1	Program <b>site</b> is safe, clean and easily accessible for program activities and the number of students. Section 4204(b)(2)(A)(i); 20 U.S.C. §7174.	Inspection of program facility.
2	<b>Inventory</b> purchased with grant funds is identified with a 21st CCLC label. Uniform Guidance: 2 C.F.R. §200.313(d)(1)	Inspection of inventory items. A list must be provided.
3	<b>Application</b> has been approved by ADE to include budget, activities, inventory, required reports and evaluation of all components.	Provide evidence that the LEA's application has been implemented.

**Title V, Part B**

<b>Monitoring Indicators</b>		<b>Acceptable LEA Evidences</b>
1	<b>Application</b> has been approved by ADE to include budget, activities, and evaluation of all components.	Provide evidence that the LEA application has been implemented.

**Title IX, Part A**  
**McKinney-Vento Education for Homeless Children and Youths**

<b>Monitoring Indicators</b>		<b>Acceptable LEA Evidence</b>
1	The LEA implements procedures to address the <b><u>identification</u></b> of homeless children and youth according to statutory definitions. McKinney-Vento Homeless Assistance Act, 42 U.S.C. §11432(g)(1)(B).	Provide enrollment, intake, and tracking forms for all identified homeless students.  Provide notes/logs/documentation of community contacts.
2	The LEA implements procedures to address the immediate <b><u>enrollment</u></b> of homeless children and youth according to statutory requirements. McKinney-Vento Homeless Assistance Act, 42 U.S.C. §11432(g)(1)(C).	Provide evidence of written procedures for enrolling homeless children.  Provide agendas, memos, and handbooks for training sessions.  Provide evidence of posters, brochures, and flyers available in each building.
3	The LEA implements procedures to address the retention of homeless students in the <b><u>school of origin</u></b> . McKinney-Vento Homeless Assistance Act, 42 U.S.C. §11432(g)(3)(B).	Provide the following: 1. Memos and other information explaining the rights of parents for their children to attend the school of origin 2. Needs assessment documents 3. District policies 4. Tracking of transportation to school of origin
4	The LEA <b><u>disseminates information</u></b> both internally and externally to ensure appropriate implementation of the statute. McKinney-Vento Homeless Assistance Act, 42 U.S.C. §11432(g)(6)(A)(v).	Provide communication tools for internal and external stakeholders.  Provide agendas, sign- in sheets, and handbooks for training sessions.  Provide evidence of posters, brochures, and flyers available in each building.
5	The LEA ensures that there is <b><u>coordination of programs and services</u></b> to homeless students and families. McKinney-Vento Homeless Assistance Act, 42 U.S.C. §11432(g)(5)(D).	Provide completed collaboration forms for community and district coordination.

6	The LEA has a system for ensuring prompt <b>resolution of dispute</b> . McKinney-Vento Homeless Assistance Act, 42 U.S.C. §11432(g)(3)(E).	Provide dispute resolution form and log.
7	The liaison participated in <b>professional development</b> this year. McKinney-Vento Homeless Assistance Act, 42 U.S.C. §11432(g)(1)(F)(ii).	Provide certificates of attendance for the district liaison from the following: 1. State Conference 2. Trainings at Educational Cooperatives 3. Other trainings
8	<b>Application</b> has been approved by ADE to include budget, activities, enrollment residency questionnaire, policies, training, phone and email logs, distributed information, records of transportation, agendas, agreements, required reports and evaluation of all components.	Provide evidence that the LEA application has been implemented.