

Guide to Answering Program Implementation Questions In Compliance Reports for 2016-2017

The format of the program implementation questions for Title I, Part A, Title I, Part D and School Choice Option (Title IX) was changed in 2014-2015. On the compliance report the types of possible auditable documentation are listed for each program implementation question. When selecting the appropriate checkbox if the LEA does not have all the auditable documentation as it is listed on the compliance report follow one of the 2 options listed below:

1. LEA selects the checkbox and comments on Part 10: Additional LEA Data the question number and the documentation that does not apply to the LEA; or
2. LEA selects the "other" checkbox and lists the auditable documentation readily available upon request.

Example:

Option 1:

Program Coordination/Integration	
1.	<p>The LEA coordinates and integrates Title I, Part A, services with other educational services in the LEA or individual school, such as Head Start, Even Start, Reading First, Early Reading First, and other preschool programs, and services for children with limited English proficiency or with disabilities, migratory children, neglected or delinquent youth, Indian children served under Part A of Title VII, homeless children, and immigrant children in order to increase program effectiveness, to eliminate duplication, and to reduce fragmentation of the instructional program. [P.L. 107-110, Section 1112(b)(1)(E)]</p> <div style="text-align: right; padding-right: 10px;"> <input checked="" type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A </div>
A. If compliance status is Yes, check all that apply. Checking a box ensures the documentation is on file and readily available upon request:	
<input checked="" type="checkbox"/> Meeting agendas, sign-in sheets, and meeting notes from LEA planning process <input type="checkbox"/> LEA plan showing program descriptions and outlining use of funds <input type="checkbox"/> Other: <div style="border: 1px solid black; height: 15px; width: 100%; margin-top: 5px;"></div>	
Part 10: Additional LEA Data (Optional) 962 of 1000	
#1 - LEA does not have meeting agendas	

Option 2:

Program Coordination/Integration	
1.	<p>The LEA coordinates and integrates Title I, Part A, services with other educational services in the LEA or individual school, such as Head Start, Even Start, Reading First, Early Reading First, and other preschool programs, and services for children with limited English proficiency or with disabilities, migratory children, neglected or delinquent youth, Indian children served under Part A of Title VII, homeless children, and immigrant children in order to increase program effectiveness, to eliminate duplication, and to reduce fragmentation of the instructional program. [P.L. 107-110, Section 1112(b)(1)(E)]</p> <div style="text-align: right; padding-right: 10px;"> <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A </div>
A. If compliance status is Yes, check all that apply. Checking a box ensures the documentation is on file and readily available upon request:	
<input type="checkbox"/> Meeting agendas, sign-in sheets, and meeting notes from LEA planning process <input type="checkbox"/> LEA plan showing program descriptions and outlining use of funds <input checked="" type="checkbox"/> Other: <div style="border: 1px solid black; padding: 2px; margin-top: 5px;">Sign-in sheets and meeting notes</div>	

Title III, Part A

Program Implementation Question	Compliance Status Response
Needs Assessment	
<p>1. Did the LEA determine that all teachers in Title III language instructional programs for LEP children are fluent in both English and any other language used for instruction, including having written and oral communication skills?</p> <p>[P.L. 107-110, Section 3116(c)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Documentation showing that teachers who are providing bilingual instruction are fluent in English and the other language used for instruction. [See Title III Teacher Fluency section of Application Instructions for 2016-2017 for examples of methods for ensuring fluency.] <p>The only reasons why an LEA should mark “N/A” for this question are if the LEA was not required to provide a bilingual program (as per statewide requirements for bilingual instruction) <u>or</u> if it was required to provide one but had a TEA Bilingual Exception in effect for the 2016-2017 school year.</p>
Parental Involvement	
<p>2. Did the LEA implement an effective means of outreach to parents of LEP/immigrant students to inform the parents of how they can be involved in the education of their children and be active participants in assisting their children to attain English proficiency, achieve at high levels in core academic subjects, and meet challenging State standards expected of all students?</p> <p><i>Note:</i> Parental outreach activities should even be supplemental to Title I, Part A.</p> <p>[P.L. 107-110, Section 3302(e)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p> <ul style="list-style-type: none"> • Documentation of activities conducted for parents of LEP/immigrant students that include the dissemination of information or discussion of at-home activities or strategies specifically related to how the parents can be involved in their children’s education and how they can support their children’s efforts to attain fluency in English. <p>It is highly unlikely that an LEA receiving these funds could justify a compliance status of “N/A” in response to this question.</p>
Private Nonprofit School Services	
<p>3. Did the LEA conduct a timely and meaningful consultation with participating private nonprofit school officials regarding the development and implementation of the Title III, Part A program?</p> <p>Note: The consultation must have occurred before the</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>Documentation that an LEA might be able to list in support of a compliance status of “Yes” include:</p>

Guide to Program Implementation Questions—Title III, Part A

Program Implementation Question	Compliance Status Response
<p>LEA made any decision that affected the opportunities of the eligible private school children, teachers and other educational personnel to participate in the program, and continued throughout the implementation and assessment of program activities.</p> <p>[P.L. 107-110, Section 9501]</p>	<ul style="list-style-type: none"> • Documentation of consultation process showing that it occurred before the LEA made any decisions that affected participation opportunities of eligible private school children or teachers; • Meeting notes showing that all required topics were included in the consultation: <ul style="list-style-type: none"> ○ how children will be identified as limited English proficient (LEP) and by whom; ○ how the needs of children and teachers will be identified; ○ what services will be offered; ○ how, where, and by whom the services will be provided; ○ how the services will be assessed and how the results of the assessment will be used to improve those services; ○ the size and scope of the equitable services; ○ the amount of funds available for those services; and ○ how and when the LEA will make decisions about the delivery of services; ○ a thorough consideration and analysis of the views of the private school officials on the provision of contract services through potential third-party providers. • Documentation showing that consultation continued throughout the implementation and assessment of the program activities. <p>The only reason an LEA could justify a compliance status of “N/A” in response to this question would be that the LEA <u>did not have</u> any participating private non-profit schools. The LEA should write the following: “LEA did not have any participating nonprofit schools in the Title III, Part A program.”</p>
<p>Administrative Costs – LEP Program</p>	
<p>4. Did the LEA meet the statutory 2% limitation on administrative costs related to the implementation of the Title III, Part A – LEP program?</p> <p>[P.L. 107-110, Section 3115(b)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA should have Title III, Part A – LEP budget documents detailing program and administrative costs.</p> <p>The only reason an LEA could justify a compliance status of “N/A” would be that the LEA <u>did not have</u> any administrative costs related to the implementation of the Title III, Part A – LEP program. The LEA should write the following: “LEA did not use Title III, Part A – LEP funds for administrative costs.”</p>
<p>5. When calculating administrative costs for the Title III, Part A – LEP program, did the LEA include all appropriate administrative costs, including both</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a “Yes” response, the LEA should have Title III, Part A—LEP</p>

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Program Implementation Question	Compliance Status Response
<p>indirect and direct costs such as administrative salaries? [EDGAR Cost Principles and P.L. 107-110, Section 9201]</p>	<p>budget documents detailing program and administrative costs. The only reason an LEA could just justify a compliance status of “N/A” would be that the LEA <u>did not have</u> administrative costs related to the implementation of the Title III, Part A – LEP program. The LEA should write the following: “LEA did not use Title III, Part A – LEP funds for administrative costs.”</p>
<p>6. Did the LEA require third-party contractor(s) associated with the Title III, Part A – LEP program to break out administrative costs, which were included in the 2% limitation? [EDGAR Cost Principles and P.L. 107-110, Section 9201]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement. To support a “Yes” response, the LEA should have copies of any third-party contracts, requiring the break-out of administrative costs; the LEA should also have Title III, Part A – LEP budget documents detailing program and administrative costs, including the administrative costs from any third-party contracts. The only reason an LEA could justify a compliance status of “N/A” would be that the LEA <u>did not have</u> any third-party contracts. The LEA should write the following: “LEA did not have any did not have any third-party contracts associated with the Title III, Part A – LEP program.”</p>
Use of Funds – LEP Program	
<p>7. Did all Title III, Part A – LEP staff who were split-funded with other funds maintain appropriate time and effort records? [EDGAR Cost Principles]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement. To support a “Yes” response, the LEA should have the following:</p> <ul style="list-style-type: none"> • a list of staff paid with Title III, Part A – LEP funds, including percentage of time spent working in program and sufficient information to indicate the work or duties carried out, as appropriate; • Documentation for charges to payroll, as required in the applicable EDGAR cost principle. <p>The LEA could justify a response of “N/A” only if the LEA had <u>no</u> staff who were split-funded with Title III, Part A – LEP funds and other funds. The LEA should write the following: “LEA had no staff who were split-funded with Title III, Part A – LEP and other funds.”</p>
<p>8. Did the LEA maintain control of Title III, Part A – LEP program funds being used to provide equitable services to private school ELL students and their teachers? [P.L. 107-110, Section 9501(d)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement. To support a “Yes” response, the LEA should have written procedures for approving and processing Title III, Part A – LEP expenditures related to services to private schools, as well as accounting records showing the</p>

Program Implementation Question	Compliance Status Response
	<p>approved expenditures according to the LEA's written procedures.</p> <p>The only reason an LEA could justify a compliance status of "N/A" in response to this question would be that the LEA <u>did not have</u> participating private non-profit schools. The LEA should write the following: "LEA did not have any participating profit nonprofit schools in the Title III, Part A – LEP program."</p>
Administrative Costs – Immigrant Program	
<p>9. When calculating administrative costs for the Title III, Part A – Immigrant program, did the LEA include all appropriate administrative costs, including both indirect and direct costs such as administrative salaries?</p> <p>[EDGAR Cost Principles and P.L. 107-110, Section 9201]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a "Yes" response, the LEA should have Title III, Part A – Immigrant budget documents detailing program and administrative costs.</p> <p>The only reason an LEA could justify a compliance status of "N/A" would be that the LEA <u>did not have</u> administrative costs related to the implementation of the Title III, Part A – Immigrant program. The LEA should write the following: "LEA did not use Title III, Part A – Immigrant funds for administrative costs."</p>
Use of Funds – Immigrant Program	
<p>10. Did all Title III, Part A – Immigrant staff who were split-funded with other funds maintain appropriate time and effort records?</p> <p>[EDGAR Cost Principles]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a "Yes" response, the LEA should have the following:</p> <ul style="list-style-type: none"> • a list of staff paid with Title III, Part A – Immigrant funds, including percentage of time spent working in program and sufficient information to indicate the work or duties carried out, as appropriate; • Documentation for charges to payroll, as required in the applicable EDGAR cost principle. <p>The LEA could justify a response of "N/A" only if the LEA had <u>no</u> staff who were split-funded with Title III, Part A – Immigrant funds and other funds. The LEA should write the following: "LEA had no staff who were split-funded with Title III, Part A – Immigrant and other funds."</p>
<p>11. Did the LEA maintain control of Title III, Part A – Immigrant program funds being used to provide equitable services to private school immigrant students and their teachers?</p> <p>[P.L. 107-110, Section 9501(d)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a "Yes" response, the LEA should have written procedures for approving and processing expenditures related to Title III, Part A – Immigrant services to private schools, as well as accounting records showing the</p>

Program Implementation Question	Compliance Status Response
	<p>approved expenditures according to the LEA's written procedures.</p> <p>The only reason an LEA could justify a compliance status of "N/A" in response to this question would be that the LEA <u>did not have</u> any participating private non-profit schools in the Title III, Part A – Immigrant program. The LEA should write the following: "LEA did not have any participating private nonprofit schools in the Title III, Part A – Immigrant program."</p>
<p>12. Did the LEA's Title III, Part A – Immigrant-funded programs provide enhanced instructional opportunities for immigrant children and youth? [P.L. 107-110, Section 3115(e)]</p>	<p>If compliance status is Yes, <u>list</u> the source(s) of documentation readily available to document compliance with the requirement.</p> <p>To support a "Yes" response, the LEA should have a description in the LEA and/or campus plans that shows how the Title III, Part A – Immigrant program enhances instructional opportunities for immigrant children and youth. The LEA should also have documentation that the program beneficiaries are immigrant children and youth.</p> <p>It is highly unlikely that an LEA receiving Title III, Part A – Immigrant funds could justify a compliance status of "N/A" in response to this question.</p>