|  |  |  |
| --- | --- | --- |
| OVERARCHING – Indicator 1  LEA Monitoring of Schools and Programs |  | OVERARCHING – Indicator 2  Comprehensive LEA Improvement Plan |
|  |  |  |
| OVERARCHING – Indicator 3  Waste, Fraud, Abuse, and Corruption |  | OVERARCHING – Indicator 4  Complaints |
|  |  |  |
| OVERARCHING – Indicator 5.1  Services to Eligible Private School Children  Title I & Title III |  | OVERARCHING – Indicator 5.2  Services to Eligible Private School Children  Title II |
|  |  |  |
| OVERARCHING – Indicator 5.3  Services to Eligible Private School Children  IDEA |  | FIDUCIARY RESPONSIBILITY – Indicator 6.1  Maintenance of Effort |
|  |  |  |
| FIDUCIARY RESPONSIBILITY – Indicator 6.2  Comparability |  | FIDUCIARY RESPONSIBILITY – Indicator 6.3  Assessment Security |
|  |  |  |
| FIDUCIARY RESPONSIBILITY – Indicator 7.1  Cost Principles: Reasonable, Necessary, Allocable, and Allowable |  | FIDUCIARY RESPONSIBILITY – Indicator 7.2  Supplement not Supplant |
|  |  |  |
| FIDUCIARY RESPONSIBILITY – Indicator 7.3  Internal Controls |  | FIDUCIARY RESPONSIBILITY – Indicator 7.4  Cash Management |
|  |  |  |
| FIDUCIARY RESPONSIBILITY – Indicator 8.1 –Title I,A  General LEA Selection and Allocation Requirements |  | FIDUCIARY RESPONSIBILITY – Indicator 8.2 – Title I,A  Rank Ordering and Allocation Procedures |
|  |  |  |
| FIDUCIARY RESPONSIBILITY – Indicator 8.3 – Title I,A  LEA Reservation of Funds |  | FIDUCIARY RESPONSIBILITY – Indicator 8.4 – Title I,A  Equitable Services for Private School Participants |
| **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Established cycle of monitoring for Title I, Part A schools and programs |  | **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. LEA monitoring policies and procedures that include a method for monitoring all critical ESEA/NCLB requirements. |
|  |  |  |
| **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Written description of the LEA monitoring process, including on-site procedures, timelines, schedules, data review, and the reporting and corrective action processes. |  | **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Data collection instruments (interview guides, documents review checklists). |
|  |  |  |
| **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Sample of letters to schools, checklists, forms, etc. |  | **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Process for identification of high risk schools. |
|  |  |  |
| **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Process for follow-up/verification of implementation of required corrective action. |  | **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Memos, reports, etc. |
|  |  |  |
| **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Monitoring reports, corrective actions from the   schools visited as part of the LEA’s on-site review. |  | **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Copies of reports, corrective actions, results of technical assistance. |
|  |  |  |
| **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Evidence of technical assistance provided by the LEA as a result of issues identified through the monitoring process. |  | **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Copies of the LEA's schedule for monitoring of schools. |
|  |  |  |
| **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Minutes of board meeting approving the annual   Grant Award Notification--SIG (if applicable). |  | **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Policies on Federal Grant Administration-SIG (if applicable). |
|  |  |  |
| **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Policy checklists. |  | **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Title I-A, Expenditure Detail reports. (see 7.1) |
|  |  |  |
| **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Completed plans--SWP, TA, School Improvement, Parental involvement plans. |  | **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Memos, reports, etc. |
| **1-LEA MONITORING OF SCHOOLS AND PROGRAMS**   1. Procedures for follow-up/verification of implementation of required corrective actions identified by the LEA. |  | **2-COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP)**   1. Written procedures for the approval process for CLIP, FLP, Equity, SWP, and TA |
|  |  |  |
| **2-COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP)**   1. Resolution procedures for unapproved plans. |  | **2-COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP)**   1. Guidance to schools and other LEA departments on submission of plan amendments. |
|  |  |  |
| **2-COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP)**   1. District Needs Assessment |  | **2-COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP)**   1. Schedule/timeline regarding the process for submission, revisions, and final edits for LEA plans. |
|  |  |  |
| **2-COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP)**   1. Evidence of timely plan approval and release of funds. |  | **2-COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP)**   1. Evidence that the LEA's plans include input from teachers, principals, administrators and appropriate school personnel, and parents |
|  |  |  |
| **2-COMPREHENSIVE LEA IMPROVEMENT PLAN (CLIP)**  1h. Description of Pre-Kindergarten services that are provided, (if applicable). |  | **3-****WASTE, FRAUD, ABUSE, AND CORRUPTION**   1. Copies of the LEA's fraudulent activity policy or administrative regulations addressing the code of ethics and waste, fraud, abuse, and corruption. |
|  |  |  |
| **3-WASTE, FRAUD, ABUSE, AND CORRUPTION**   1. Written procedures for disseminating the LEA’s fraud, waste, and abuse policy; code of ethics and procedures regarding waste, fraud, and abuse; or administrative regulations for reporting waste, fraud, and abuse to all employees/staff. |  | **3-WASTE, FRAUD, ABUSE, AND CORRUPTION**   1. Copies of dated agendas, dated sign-in sheets, meeting minutes, etc., documenting dissemination of policy/administrative regulations. |
|  |  |  |
| **3-WASTE, FRAUD, ABUSE, AND CORRUPTION**   1. Written conflict of interest policy that includes standards of conduct covering conflicts of interest and governing the actions of the LEA's employees engaged in the selection, award and administration of contracts. The policy must state that no employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. |  | **4-COMPLAINTS**   1. The LEA’s written complaint procedures. |
|  |  |  |
| **4-COMPLAINTS**   1. The LEA’s documentation that the complaint process has been widely disseminated to schools in the LEA, parents, and stakeholders. |  | **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Copies of all DE1111 forms submitted to LEA for the FY16 and FY17 school years and private school letters for both years with U. S. postal registration receipts inviting private school participation in Title I, Part A funding and Title III Part A funding. |
|  |  |  |
| **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Copy of procedures that the LEA uses to determine that the required consultation occurred. |  | **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Evidence that the LEA has met the requirement for consultation, written affirmation, and evaluation of the program. |
| **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Evidence that consultation has occurred between the LEA and private school officials prior to the LEA making any decision. |  | **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. The written affirmation (consultation and services provided) from officials of private school or a representative. |
|  |  |  |
| **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Evidence that, when LEA contracts with third party, ensures the third party is providing Title I Part A services to eligible private school children |  | **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Evidence that, when the LEA contracts with third party contractors, the administrative costs for the contractor are taken off the top. |
|  |  |  |
| **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Third party contract(s) and invoices from the third party contractor (If applicable). |  | **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Evidence that providers of services are employees of the LEA or employees of third party contractor. |
|  |  |  |
| **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Evidence that the LEA is evaluating the Title I program serving private school students and making modification as necessary. |  | **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Evidence that the LEA has provided guidance/technical assistance to its staff regarding the provision of services to eligible private school students. |
|  |  |  |
| **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Evidence that the LEA regularly supervises the provision of Title I services to private school children. |  | **5-SERVICES TO ELIGIBLE PRIVATE SCHOOL CHILDREN**   1. Evidence that the LEA maintains control of the Title I funds, materials, equipment and property that support services to private school children. |
|  |  |  |
| **Title II, Part A (2a-2d has already been done)** |  | **5-IDEA**   1. LEA’s procedures used to determine that the required consultation occurred. |
|  |  |  |
| **5-IDEA**   1. Evidence that the LEA has met the requirement for consultation, written affirmation, and evaluation of the program. |  | **5-IDEA**   1. Evidence that consultation has occurred between the LEA and private school officials or its representatives regarding services for private school children prior to the LEA making any decision. |
|  |  |  |
| **5-IDEA**   1. The written affirmation from officials of private school or a representative. |  | **5-IDEA**   1. Evidence that the LEA has met the requirement for financial record keeping related to services to private school children that facilitate an effective or programmatic audit. |
|  |  |  |
| **5-IDEA**   1. LEA’s documentation to ensure that third party contractors are providing services to eligible private school children in accordance with all IDEA requirements. |  | **5-IDEA**   1. Evidence that LEA’s contracts with third party contractors to provide services to private school children, the administrative costs for the contractor are taken off the top. |
| **5-IDEA**   1. Third party contract(s) and invoices from the third party contractor (If applicable). |  | **5-IDEA**   1. Evidence that the LEA has provided guidance/technical assistance to its staff regarding the provision of services to eligible children attending private schools. |
|  |  |  |
| **5-IDEA**   1. Evidence that the LEA regularly supervises the provision of IDEA services to private and home school children. |  | **5-IDEA**   1. Evidence of service plans if applicable. |
|  |  |  |
| **5-IDEA**   1. Evidence of Child Find activities to private schools. |  | **6.1-MAINTENANCE OF EFFORT**   1. Source data to support the request to the Department to seek waiver. |
|  |  |  |
| **6.1-MAINTENANCE OF EFFORT**   1. Procedures for determining maintenance of effort (MOE), including funds to be excluded from MOE calculations. |  | **6.1-MAINTENANCE OF EFFORT**   1. MOE Eligibility Form with projected expenditures for current year. (IDEA) |
|  |  |  |
| **6.1-MAINTENANCE OF EFFORT**   1. Exception requirement forms with supporting evidence verifying expenditures (usually this is expenditure report) maintained by LEA for LEAs that did not meet or LEAs who reduce effort optionally. (IDEA) |  | **6.1-MAINTENANCE OF EFFORT**   1. Correction forms if applicable with supporting evidence verifying expenditures maintained by LEA. |
|  |  |  |
| **6.2-COMPARABILITY**   1. If not comparable, documentation showing adjustments (including dates of hires or staff reassignment to meet comparability) to the allocation of resources that the LEA made to ensure comparability. |  | **6.3-ASSESSMENT SECURITY**   1. Copies of communication to local educators regarding the LEA’s test security policy/plan and consequences for violation.   The LEA's test security policy/plan and consequences for violation are made available to local educators.  The LEA's test security policy/plan and consequences for violation are made available to local educators. |
|  |  |  |
| **7-****SUPPLEMENT NOT SUPPLANT AND INTERNAL CONTROLS**  **Cost Principles: Reasonable, Necessary, Allocable, and Allowable**   1. Written allowability procedures that provide detailed processes that takes the LEA through grant development and budget process. The allowability procedures may not be a simple restatement of 2 CFR Part 200, Subpart E. |  | **7-SUPPLEMENT NOT SUPPLANT AND INTERNAL CONTROLS**  **Cost Principles: Reasonable, Necessary, Allocable, and Allowable**   1. Payroll showing number of teachers/paraprofessionals/other at each school/location must equal the number approved in the consolidated application and budget. |
|  |  |  |
| **7-SUPPLEMENT NOT SUPPLANT AND INTERNAL CONTROLS**  **Cost Principles: Reasonable, Necessary, Allocable, and Allowable**   1. Capital expense funds used as detailed in approved application, if applicable. |  | **7-SUPPLEMENT NOT SUPPLANT AND INTERNAL CONTROLS**  **Cost Principles: Reasonable, Necessary, Allocable, and Allowable**   1. Approval (email) from the Department to make capital expenditures with Federal funds (object code 700). |
|  |  |  |
| **7-SUPPLEMENT NOT SUPPLANT AND INTERNAL CONTROLS**  **Cost Principles: Reasonable, Necessary, Allocable, and Allowable**   1. Purchase orders for items in object code 700. |  | **7-SUPPLEMENT NOT SUPPLANT AND INTERNAL CONTROLS**  **Cost Principles: Reasonable, Necessary, Allocable, and Allowable**   1. Records showing LEA Chart of Accounts, Budget Reports, Expenditure reports, Travel packets, Detailed Payroll Labor Distribution Reports (or equivalent payroll report) by facility code for federal paid employees |
| **7-SUPPLEMENT NOT SUPPLANT AND INTERNAL CONTROLS**  **Cost Principles: Reasonable, Necessary, Allocable, and Allowable**   1. Written method for conducting technical evaluations of proposals and selecting recipients for procurement. |  | **7-SUPPLEMENT NOT SUPPLANT AND INTERNAL CONTROLS**  **Cost Principles: Reasonable, Necessary, Allocable, and Allowable**   1. Written travel policy and procedures that addresses expenses for transportation, lodging, subsistence, and related items by employees who are in travel status on official business |
|  |  |  |
| **7-SUPPLEMENT NOT SUPPLANT AND INTERNAL CONTROLS**  **Cost Principles: Reasonable, Necessary, Allocable, and Allowable**   1. Supporting documentation for items selected for review (such as invoices, purchase orders, agendas from conferences, voucher packet, etc.). |  | **7-SUPPLEMENT NOT SUPPLANT AND INTERNAL CONTROLS**  **Cost Principles: Reasonable, Necessary, Allocable, and Allowable**  1j.Class Size Reduction Worksheet and teacher/grade level/content schedules (if applicable). |
|  |  |  |
| **7-Supplement not Supplant**   1. Questions or inquiries from LEA staff and schools regarding supplement not supplant issues have been adequately addressed (emails, memos, etc.). |  | **7-Supplement not Supplant**   1. Evidence that the Special Education Director’s salary is above the QBE allotment. |
|  |  |  |
| **7-Supplement not Supplant**   1. Monitored expenditures of the LEA and schools to ensure that funds are used to supplement, and not supplant state and local funds. |  | **7-Supplement not Supplant**   1. Approved budget and record of expenditures of Title I federal funds at both the LEA and school levels. |
|  |  |  |
| **7-Supplement not Supplant**   1. Documents that Title I schools have received all the state and local funds they would need to operate in the absence of federal funds. |  | **7- Supplement not Supplant - Title I, Part A**   1. The LEA has developed a methodology that equitably distributes state and local funds and resources to each of its schools. |
|  |  |  |
| **7- Supplement not Supplant - Title I, Part A**  2g. The LEA has documentation showing the equitable distribution of state and local funds and resources to each of its schools. |  | **7- Supplement not Supplant - Title I, Part A**  2h. Targeted Assistance Programs   1. Expenditures are only used for identified students in a targeted assistance school 2. Expenditures meet traditional 3-prong test 3. What would have happened in the absence of federal funds? 4. Did the school provide the program with Title I funds in prior years? 5. Is the district providing the program for non-Title I children with other funds? |
|  |  |  |
| **7-Internal Controls and Procedures**   1. Effectiveness and efficiency of operations; |  | **7-Internal Controls and Procedures**   1. Reliability of reporting for internal and external use |
|  |  |  |
| **7-Internal Controls and Procedures**   1. Compliance with applicable laws and regulations. |  | **7-Internal Controls and Procedures**   1. Expenditure detail reports for all completed expenditures related to FLP, (payroll history, time sheets for FLPs tutors, transportation, equipment and instructional materials/supplies, administrative costs charged to FLP). |
|  |  |  |
| **7-Internal Controls and Procedures**   1. Written procedures evidence of procurement and rationale of contractual service complies with applicable policies, procedures and regulations, and performance/deliverables. 2. Copy of signed contract. 3. Performance/deliverables must be verifiable. |  | **7-Internal Controls and Procedures**   1. Written financial and program policies or procedures that ensure internal controls, including segregation of duties; ensures accountability; appropriate authorization; and compliance with all applicable laws and regulations |
| **7-Internal Controls and Procedures**   1. Record of personnel records (semi-annual certifications, personnel activity reports). |  | **7-Internal Controls and Procedures**   1. Record of inventory purchased with federal funds that contains the required elements specified in 2 CFR Part 200.313 (Uniform Grant Guidance), (check CFM Rubric for more details). |
|  |  |  |
| **7-Internal Controls and Procedures**   1. Single A-133 audit reports for two year period (2 CFR Part 200). |  | **7-Internal Controls and Procedures**   1. Written plan/procedures detailing when after-the-fact periodic certifications will be conducted. |
|  |  |  |
| **7-Internal Controls and Procedures**   1. Current school year’s after-the-fact periodic certifications. (check CFM Rubric for more details) |  | **7-Internal Controls and Procedures**   1. Previous school year’s after-the-fact periodic certifications (if two certifications have not been completed in current year). |
|  |  |  |
| **7-Internal Controls and Procedures**   1. Detailed monthly time logs or employee schedules. |  | **7-Internal Controls and Procedures**   1. Written procedures and written or digital evidence of LEA verification for suspension and debarment. |
|  |  |  |
| **7-Cash Management**   1. Written internal controls to segregate duties associated with cash management, to monitor cash management activities (including reconciliations), to ensure reimbursements are made only after costs have been incurred, or cash advances are made not more than three days to actual cash Payment outlay, and to implement the requirements of §200.305- (includes regulations regarding earning interest, standards governing the use of banks, etc.). |  | **7-Cash Management**   1. Policy/procedures that indicate how sub-recipient requests are evaluated before funds are released for reimbursement. |
|  |  |  |
| **7-Cash Management**   1. LEA's drawdown requests (DE0147), and LEAs request are supported by accounting records of outlays (expenditures) prior to but not more than 3 days usually of request. |  | **7-Cash Management**   1. Payments to LEA were determined to meet immediate cash needs. |
|  |  |  |
| **7-Cash Management**   1. Drawdowns made from Title I, Part A |  | **8-General LEA Selection and Allocation Requirements**   1. Documentation, if applicable, that the LEA has a waiver of requirements for the determination of eligible school attendance area and allocations under a state-ordered or court-ordered desegregation plan. |
|  |  |  |
| **8-General LEA Selection and Allocation Requirements**   1. Copy of free/reduced lunch count and/or directed certified report from the LEA School Food Nutrition department for participating CEP schools. LEAs using the CEP option must provide the procedures for determining rank order for the LEA's schools |  | **8-General LEA Selection and Allocation Requirements**   1. Documentation for residential treatment facilities (previously called 618 schools). List showing the referring entity for each student: (Parent/guardian, Department of Human Services (DHS), Department of Juvenile Justice (DJJ), or another LEA. For those students referred by a parent/guardian or another LEA, documentation regarding poverty must be on file (example: TANF, school lunch application, etc.). |
|  |  |  |
| **8- Rank Ordering and Allocation Procedures**  **Rank Order**   1. Copy of written procedures for identifying eligible students. |  | **8- Rank Ordering and Allocation Procedures**   1. List of students by each content area served in rank order according to multiple, educationally related, objective selection criteria with students receiving services identified in the following programs: 2. Targeted Assistance Programs 3. School-wide Programs where participation is offered to a select group of students 4. Flexible Learning Programs (prior to applying the Federal Rank Order) |
| **8- LEA Reservation of Funds**   1. Documentation related to the amount of funding that has been expended for NCLB choice-related transportation and Flexible Learning Programs (FLP). |  | **8- LEA Reservation of Funds**   1. Written procedures to ensure the LEA has correctly calculated the amount of funds for parental involvement and FLP including carryover as appropriate. (Expenditure detail, carryover worksheet). |
|  |  |  |
| **8- Equitable Services for Private School Participants**   1. Written procedures to ensure the LEA has correctly calculated the amount of funds for equitable services to private school participants and their teachers and families, including carryover as appropriate. |  | **8- Equitable Services for Private School Participants**   1. Amount reserved for instructional services--Private School Participant |
|  |  |  |
| **8-Equitable Services for Private School Participants**   1. Amount reserved for parental involvement--Families of private school participants |  | **8-Equitable Services for Private School Participants**  4c. Amount reserved for professional development—Teachers of private school participants |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |