FY23 Cross-Functional Monitoring (CFM) Pre-Recorded Webinar Series

Title III, Part A

Language Instruction for English Learners

and Immigrant Students

September 19, 2022

Presenters

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Agenda

1. General Information
   - Resources
   - Tasks & timeline
   - Submission of *Data Rosters*
   - Organization of documentation

2. CFM Overarching Indicators 1-5 and Program Specific Indicators 17.1, 17.2, 17.3, 17.4, 17.5
   - Explanation of indicator
   - Evidence, documentation, and Pro-Tips for indicator
   - Common misunderstandings for indicator

3. Contact Information & Feedback

General Information

*Offering a holistic education to **each and every child** in our state.*

Main CFM Resources
Federal Programs Monitoring Webpage

Resources

- Federal Programs Monitoring
- LEA Consolidated Application
- Federal Programs Handbook
- Professional Qualifications and Related Reporting Requirements
- Consolidation of ESSA Administrative Funds LEA Request Form
- ESSA Programs - Online Courses
- Coronavirus Aid, Relief, and Economic Security (CARES) Act
- FED Talks - Series Two
- ESSA and IDEA Tuesdays in June Professional Learning
- Academy of New Federal Program Leaders
- FY23 Federal Formula Allocations – ESSA and IDEA - 7.21.2022

Monitoring Resources

- Monitoring Cycles FY19 - FY23
- FY23 Cross Functional Monitoring Document
- FY23 Special Education CFM Labeling Guidance for IEP Uploads (CHECK BACK SOON)
- FY23 Special Education Due Process Checklist for Student Folder Review (CHECK BACK SOON)
- FY23 Special Education CFM Training Document (CHECK BACK SOON)
- FY23 Georgia Special Education Rules Outline (CHECK BACK SOON)
- FY23 IDEA Fiscal Monitoring Checklist for LEAs (CHECK BACK SOON)
- FY23 IDEA Fiscal GNETS Monitoring Checklist (CHECK BACK SOON)
- FY23 CFM File Labels

Supplemental Title IIIA Resources
Title IIIA CFM Webpage

Additional Information

Title III Cross-functional Monitoring

FY 20 Title III, Part A Annual Report

FY 21 Title III, Part A Annual Report

Title III Monitoring Documents

LEA Monitoring Forms and Resources

- FY23 Title III, Part A Program Overview Report (Traditionally Funded LEAs)
- FY23 Title III, Part A Program Overview Report (CoF LEAs)
- FY23 Title III, Part A CFM Companion Guide (coming soon)
- Title III, Part A Required Written Procedures
- FY23 Title III, Part A Data Rosters for CFM Template
- Core EL Student Documentation

- Invitation to Interview Letter
  - English letter
  - Spanish letter

Tasks & Timeline – LEA submits to SEA
2 weeks prior to CFM date:

Indicator	Documentation to Submit and/or Send
5.1	**FY 22 & FY 23 Payroll and Expenditure Detail Reports for each program** (CoF LEAs who consolidate all Federal subgrant funds must upload Fund 150 documentation): • Title III English Learner Subgrant • Immigrant Subgrant (if applicable)
17.1	Updated and completed **Title IIIA Data Rosters for CFM** (six rosters) • Contains Personally Identifiable Information (PII) • Submitted to Title III Regional Specialist assigned to LEA using the secure email system in the MyGaDOE portal
17.4	Download and send *Invitation to Interview Letter* to parents of all Title III-served ELs in a language they understand. (N/A for CoF LEAs who consolidate Title IIIA subgrant funds)

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Tasks & Timeline – SEA Tasks
1 week prior to CFM date:

Indicator	Documentation to Submit and/or Send
5.1	Specialist will **send** the Title III Director highlighted expenditures **to submit Purchase Orders and relevant source documentation on CFM date.**
17.1	Specialist will **send** the Title III Director list of students for whom **to submit EL records on CFM date**
17.4	GaDOE Parent Interviewer continues calling parents of Title III-served students (N/A for CoF LEAs)

Indicator	Documentation to Submit and/or Send
1.1	See CFM Indicators document – Elements A - G **and I**
1.2	See CFM Indicators document – Elements A, C, D, E, and I
1.3	See CFM Indicators document – Elements A, E and F
2.1	See CFM Indicators document – Elements A - C
3.1	See CFM Indicators document – Elements A - C and D - L (if applicable)
4.3	Evidence will be submitted to Title I, Part A for Element C: ELP Assessment Participation Rate
5.1	See CFM Indicators document – Elements A - K, except H
5.2	See CFM Indicators document – Elements A - D (all)
5.3	See CFM Indicators document – Elements A - C
17.1-17.4	See CFM Indicators document – Elements: All
17.5	If applicable, see CFM Indicators document – Elements A - B

COF LEAs: Please see *Federal Programs CFM Indicators Notes About COF* in the right-hand column with an orange header.

Data Rosters Process

Receive / Prepare (Nov/Dec)

Receive prepopulated **Title IIIA CFM Data Rosters** in MyGaDOE secure email

OR

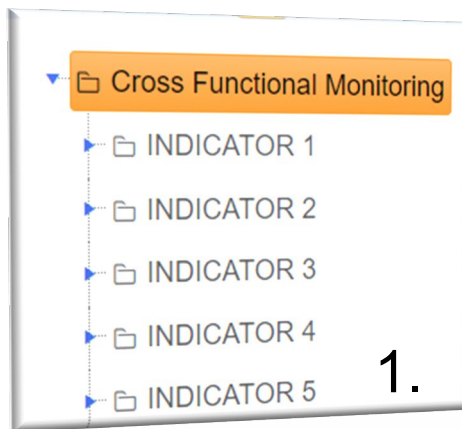Prepare your own **Title IIIA CFM Data Rosters** using Template

Review / Update

-Remove withdrawn students

-Add newly enrolled students

-Add any missing data elements for any student (ex: Name of ELP Screener, ELP Screener Scores, ACCESS scores, etc.)

-If data is not available, provide an explanation in the "Comments" column to the far right.

Complete

1. Private School Student Roster, if applicable

2. EL=Yes Roster

3. EL=1 and EL=2 Roster

4. Immigrant Roster

5. EL Parent Roster

6. Title III-funded Staff Roster

Review

All Rosters

All Data

All Comments

Organization

Cross Functional Monitoring
- INDICATOR 1
- INDICATOR 2
- INDICATOR 3
- INDICATOR 4
- INDICATOR 5

1. Scan all source documentation (including the selected EL student records) as required for each CFM Indicator for Title III, Part A
   - Provide documentation for onsite visit

2. Organize documents in folders by Indicator and its Elements

3. Follow naming conventions. *Use short names as possible*
   - Include fiscal year in the documentation title (FY 22 or FY 23)
   - In Overarching Indicators: Include Title IIIA in the document title if the evidence is specific to Title IIIA

Examples:
   - In Folder for Indicator 5.1 - FY 22 Title IIIA P.O.s,
   - In Folder for Indicator 1.3 - FY 22 LIEP Effectiveness Summary Data

Overarching Indicator 1

LEA Monitoring of Programs

Indicator 1
Explanation

- The LEA conducts monitoring of its programs for both implementation and effectiveness of funded strategies/activities at the LEA, school, and program levels to ensure compliance with Uniform Grant Guidance and Federal program requirements.

- **ESEA: Sec 1114(b)(3); Sec 1304; Sec. 1306; Sec. 2104(a)(1); 2 CFR 200.301**

Indicator 1.1 – Written Procedures to Monitor Title IIIA Program
Evidence/Documentation

Evidence <u>shall</u> include **Written procedures** used to monitor the implementation of the Title IIIA English learner and Immigrant programs at the district and schools (where applicable). These procedures will specify how the district will monitor Title IIIA Programs (EL & Immigrant) to include:

A. Steps the LEA will use to monitor and provide technical assistance for the implementation of the Title III programs

B. Position(s) responsible for the implementation and monitoring

C. Frequency of monitoring (timeline)

D. List of documentation that will be maintained to verify the Title III programs have been monitored

E. Follow up/verification of corrective actions at schools and district (identified by the LEA)

F. Review of Title IIIA budgets

G. Description of the process the LEA uses to identify high risk schools within the district

I. Procedures to include how the LEA monitors the EL identification processes, supplemental language instruction educational programs (LIEPs), EL-specific professional learning, EL parent/family/community outreach and immigrant programs, if applicable.

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Indicator 1.1
Pro Tips

1. Use these headings in Section 1.1 of the LEA's Title III Handbook:
   - LEA monitoring the implementation of the EL entrance and exit procedures
   - LEA monitoring the implementation and effectiveness of each of the LIEPs
   - LEA monitoring the implementation and effectiveness of the EL-focused PD
   - LEA monitoring the implementation and effectiveness of the EL-focused parent, family, and community engagement program
   - LEA monitoring the Title IIIA budget, expenditures, and drawdowns

2. Under each heading, describe the LEA-specific process for monitoring each part of the Title IIIA subgrant.

Indicator 1.2 – Implement Written Procedures to Monitor Title IIIA Program Implementation
Evidence/Documentation

Evidence <u>shall</u> include **implementation** of the LEA's written procedures for monitoring Title III, Part A. LEAs may provide the following types of documentation:

A. Data collection instruments used to monitor the implementation of Title III funded activities, strategies and budgets (interview guides, program review checklists, self-monitoring reports)

C. Copies of the LEA's schedule for monitoring schools

D. Samples of communications to schools

E. Evidence of technical assistance provided by the LEA because of issues identified through the monitoring process (monitoring reports, corrective actions from the schools visited

I. Documentation of monitoring Title IIIA English Learner and Immigrant programs, such as documentation of school visits, oversight of program implementation, corrective action steps taken, etc.

Indicator 1.2
Pro Tips – Sample Documentation

- For LIEP software – student usage reports that are dated and signed by the director
- For LIEP after school tutoring/summer school - teacher time sheets, student sign in sheets, teacher lesson plans, documentation of site visits
- For EL-focused PD – Instructional Coach presentation on EL instructional strategies - presentation materials, agenda, sign in sheets
- For EL-focused PD – WIDA self-paced modules – evidence of course completion by LEA staff
- For EL Parent, Family and Community Engagement – Literacy classes for parents – Presentation materials, agendas, sign in sheets
- For Title IIIA budget – Evidence that the Title III director reviews the expenditure detail report on a regular basis (monthly, quarterly) and works with the finance office to make revisions, when necessary.
- For Title IIIA drawdowns – Evidence that the Title III director signs off on the drawdowns prior to submission.

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Indicator 1.3 – Implement Written Procedures to Monitor Title IIIA Program Effectiveness - Evidence/Documentation

Evidence <u>shall</u> include documentation of the **effectiveness** of Title III, Part A funded activities. LEAs may provide the following types of documentation:

A. Source documentation to support summary data and analysis for determining the effectiveness of all Title III, Part A funded activities/strategies from the CLIP.

E. Summary data, analysis, and source documentation to support the identified effectiveness determination of each FY 22 Title III, Part A funded activity. LEA FY23 data as specified on the *Title III, Part A English Learner Program Overview Report (for traditionally funded LEAs and CoF LEAs)*.

F. Completed/annotated Logic Models with supporting data

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Title III, Part A Program Overview Report

LEA Name

Title III, Part A Program Overview Report

Complete this report on the activities conducted and children served under Title IIIA, as described in Sec. 3121(a). LEAs may want to complete this report annually for improvement of programs and activities (Sec. 3121(b)).

FY 23 EL Student & ESOL Teacher Population Per School Level

(Do not include EL=1 and EL=2 students. Student totals align with *EL=Yes Data Roster*.)

	Number of ELs at each level	Percentage of ELs to Total School Population	Number of ESOL Teachers at each Level
Primary Schools	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Elementary Schools	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Middle Schools	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
High Schools	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Alternative Schools (includes virtual)	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Totals	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

Total Number of ESOL-Certified or Endorsed Teachers across LEA	
No. of Part-Time ESOL Teachers	Click or tap here to enter text.
No. of Full-Time ESOL Teachers	Click or tap here to enter text.
% of ESOL Endorsed/Certified Teachers in LEA to Total Teachers in LEA	Click or tap here to enter text.

FY 23 EL=1 and EL=2 Student Population Per School Level

Consolidation of Funds LEA Name

Title III, Part A Program Overview Report

Complete this report on the activities conducted and children served under Title IIIA, as described in Sec. 3121(a). LEAs may want to complete this report annually for improvement of programs and activities (Sec. 3121(b)).

FY 23 EL Student & ESOL Teacher Population Per School Level

(Do not include EL=1 and EL=2 students. Student totals align with *EL=Yes Data Roster*.)

	Number of ELs at each level	Percentage of ELs to Total School Population	Number of ESOL Teachers at each Level
Primary Schools	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Elementary Schools	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Middle Schools	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
High Schools	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Alternative Schools (includes virtual)	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Totals	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

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Indicator 1.3
Pro Tips

Provide an LEA-written summary of the data collected and the effectiveness determination that is aligned to the LEA-designed SMART goal designed to measure the effectiveness of the activity.

Sample evidence of monitoring various Title IIIA activities…

- For LIEP software such as digital language learning software programs – Student growth as seen on growth reports from start to end of the program

- For EL-focused PD Instructional Coach presentation on EL instructional strategies – Feedback from coach or administrator observing the teachers in the classroom implementing the instructional strategies learned in the PD

- For EL Parent, Family and Community Engagement – Literacy classes for parents – Participating parents' growth in knowledge of school English as measured by the LEA-designed pre- and posttests.

Indicator 1
Common Misunderstandings

- Limited or unclear written procedures for how the LEA monitors the implementation and effectiveness of Title IIIA English Learner or Immigrant programs

- Limited or inconsistent evidence of LEA monitoring the implementation and effectiveness of Title IIIA English Learner and Immigrant programs.

- No data analysis evident - only raw data provided - lack of evidence of:
  - A written a summary of the effectiveness of the LIEPs, EL-focused PD program and parent, family and community outreach activities
  - Analyzing EL students' progress toward English proficiency (ACCESS) and EL students' academic achievement in core content (GA Milestones/local assessment)
  - Effectiveness of Title III interventions, strategies, activities

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Indicator 1 for CoF LEAs

- Monitoring COF Schoolwide Plan Implementation • GaDOE will select a sample of CoF schools. For formula grants the LEA will need to provide copies of the **most recent schoolwide plans (SWP) and corresponding intent and purpose (I&P) statements**.

- LEAs will provide LEA/School-selected documentation demonstrating how the LEA carried out their procedures for monitoring critical ESEA/IDEA requirements of all consolidated programs and their implementation at sampled consolidating Title I schoolwide schools.

Title IIIA Evidence - Submitted by COF LEAs

- **Title III, Part A: English Learners**:
  a. Must include evidence of implementation of supplemental language instruction program(s) [must be supplemental to language instruction program required by US Office of Civil Rights (OCR), Civil Rights Act of 1964, Equal Education Opportunities Act of 1974, and State/Local Laws]
  b. Must include evidence of implementation of EL focused professional learning for all classroom teachers, including teachers that are not ESOL teachers, principals and other school leaders, administrators and other school or community-based organizational personnel
  c. Must include evidence of EL parent, family and community engagement activities that enhance or supplement the school's language instruction programs for ELs

- **Title III, Part A: Immigrant:** Must include evidence of implementation of SWP activities that provide enhanced instructional opportunities for immigrant children and youth, which may include family literacy, training and outreach, recruitment of personnel trained to provide services to immigrants, tutorials, mentoring, academic or career counseling, instructional resources, technology, activities coordinated with community organizations with expertise working with immigrant, and instructional services designed to address students' sense of well-being and connectedness in U.S. school systems.

Indicator 2

Consolidated LEA Improvement Plan (CLIP)

Indicator 2
Explanation

- The LEA ensures that it complies with the provision for submitting an annual application to the SEA and revising the LEA's plans as necessary to reflect substantial changes in the direction of the LEA's program.

- **ESEA: Sec. 1112, 1114, 1115, 1116; Sec. 1003; Sec. 1306; Sec. 1423; Sec. 122; Sec. 3116; Sec. 4105(a); Sec. 4106; Sec. 5223; Sec. 5224; Sec. 6223; Sec. 6722; Sec. 9305**

Indicator 2 – Consolidated LEA Improvement Plan (CLIP)
Evidence/Documentation

2 – CLIP Evidence <u>shall</u> include:

A. Written procedures for creating, reviewing, and approving the CLIP for Title IIIA which shall include resolution procedures for unapproved CLIPs.

B. Documentation to support the selection of evidence-based action steps in the CLIP

C. CLIP Preparation:

    I. Evidence to verify the participation of required stakeholders and community-based partners for Title IIIA in CLIP preparation

    II. Evidence of CLIP preparation may include review checklists (CLIP Review Rubric), established schedule, samples of correspondence with schools and other LEA departments

Indicator 2
Pro Tips

1. Parents of ELs <u>must</u> participate in CLIP meetings
2. Title III Director/Coordinator <u>must</u> participate in CLIP meetings
3. CLIP meeting attendance sheets should contain the "role" of the attendees, so it is clear which parents, teachers and administrators attending are "EL" parents, "EL" teachers and administrators of "ELs". It is acceptable if the director adds hand-written notes to the Sign-in sheet to indicate this information.

Indicator 2
Common Misunderstandings

- Limited or missing evidence of required EL stakeholders (Ex: Title III Director, EL parents) participating in CLIP process/meetings

- Sign-in sheets missing the "role" of the participants or clearly noting which teachers/parents/administrators serve "ELs"

Indicator 3

Services to Eligible Private School Children

Indicator 3
Explanation

- Evidence that the LEA provides for the equitable provision of services to eligible private school children, their teachers, principals, and other school leaders

- Evidence that LEA provided initial consultation to private schools on their participation

- For LEAs with Participating Private Schools: Evidence that participating private schools engage in ongoing consultation around the equitable provision services

- **ESEA: Sec. 1117 and 1120; Sec. 2102(b)(2)(E); Sec.8501(a)(5); Sec. 8501(c); Sec. 4106(e)(2)(B); Sec. 8501(a)(5); Sec. 8501(c); 34 CFR Part 200.62-200.67; 34 CFR Part 200.77 (f) ED Non-Regulatory Guidance Title IX, Part E Equitable Services (2009)**

Indicator 3 - Evidence/Documentation

A. ES4PS: 2022-2023 Invitations: Invitations sent in 2021-2022 to private schools for FY 23 equitable services participation

- Title III, Part A – Invitation to private schools whose physical location is within geographic boundaries

A. For any private school that did not respond in ES4PS, evidence that the LEA made a good faith effort to invite the school to the initial consultation meeting.

C. Evidence that initial consultation for 2022-2023 occurred between the LEA and private school   officials or its representatives regarding services for private school children prior to the start of the grant (July 1, 2022)

1. Evidence that initial consultation covered all topics required by statute

2. Documentation of initial consultation attendance

Indicator 3 Cont. - Evidence/Documentation

3.1 – For school systems **with** private schools participating in Title III, Part A

F. **Nonprofit Status:** Documentation of current year nonprofit status

G. **Private School Count -** Verification of K-12 English Learner students identified in 2021-2022 and/or K-12 Immigrant students identified in October 2022

H. **Eligibility** - Verification of eligibility to receive Title III, Part A services

I. **Needs assessment** results of private school English learners and their families, teachers of ELs, and leaders of ELs supporting FY23 Equitable Services Implementation Plan

J. **Plan & Budget:** Documentation of FY23 Implementation Plan for Services and aligned FY23 budget

K. Documentation of **ongoing consultation** during 2022-2023, such as dated meeting agendas and/or minutes with sign-in rosters, email exchanges, etc. (See 2022-2023 CFM Indicators document)

L. **Complaints:** If applicable, evidence of adequately addressing problems and complaints raised by private school officials.

Indicator 3
Pro Tips

1. Compare the private schools listed on the [GaDOE Private School List](#) (updated annually) to ensure that they are the same schools listed in ES4PS. If any schools are missing from ES4PS, the school system should add them.
2. A **good faith effort** must be made to invite every private school (non-profit and profit) to the school system's initial consultation meeting. If the private school does not respond in ES4PS, the school system should re-send the invitation in ES4PS **and** call the private school (document the date/time the call was made, who made the call and the name of the person at the school to whom they talked). Submit this documentation at CFM time.

Indicator 3
Common Misunderstandings

- Incomplete invitations – no meeting date, time or location
- Unclear consultation meeting sign-in sheets regarding which private schools attended
- Limited evidence of <u>ongoing consultation</u> with participating private schools
- Statewide standardized EL entrance and exit procedures not followed for English learner identification (in participating private schools)
- Limited evidence of measuring the effectiveness of the private schools' Title III equitable services (in participating private schools)
- Services not provided to private schools

Indicator 4

Maintenance of Effort (MOE) and Comparability, Assessment Security, Reporting, ELP Assessment Participation

Indicator 4.3.C.
Explanation

- **Section 1111(b)(2)(G)(i) -** *Each state plan shall demonstrate that local educational agencies in the state will provide for an annual assessment of English proficiency of all English learners in the schools served by the State educational agency.*

- **Section 3113(b)(3)(A)** *– The agency will ensure that eligible entities receiving a subgrant under this subpart annually assess the English proficiency of all English learners participating in a program funded under this subpart, consistent with section 1111(b)(2)(G)(i).*

Indicator 4.3.C. - ELP Assessment Participation Evidence/Documentation

4.3.C – English language proficiency (ELP) Assessment Participation Rate

i.   Documentation of Spring 2022 *ACCESS for ELLs assessment* participation rate

   GaDOE provides in the ELP Assessment Participation Rate application in the MyGaDOE portal.

ii. If the percentage falls below 95%, upload the LEA's written procedures indicating who is responsible for checking the participation rate and the process for collecting the justification reasons. Include a timeline.

iii. Upload Corrective Action Plan if the 2022 participation rate is below 95%.

Indicator 4
Common Misunderstandings

If participation rate is below 95%...

- Incomplete or missing procedures indicating:
  - The position responsible for checking the ELP Assessment Participation Rate, and
  - The process or timeline for collecting the justification reasons if the percentage falls below 95%

- Incomplete or missing corrective action plan

Indicator 5

Internal Controls, Expenditures, Inventory, Drawdowns, Cost Principles

Indicator 5.1
Explanation

- Internal Controls specific to LEA expenditures required to be in writing by 2 CFR Part 200 (Allowability, Segregation of Duties, Procurement, Technical Evaluations of Competitive Proposals, Conflict of Interest, Time and Effort, Stipends, Travel) are present and meet requirements for internal controls:

- Effectiveness and efficiency of operations

- Reliability of reporting for internal and external use

- Compliance with applicable laws and regulations

- Ability to meet the following objectives for Federal Awards:
  - Transactions are properly recorded and accounted for, to
    - Permit the preparation of reliable financial statements and Federal reports
    - Maintain accountability over assets.
  - Transactions are executed in compliance with
    - Federal statutes, regulations, and the terms and conditions of the Federal award that could have a direct and material effect on a federal program.
  - Any other Federal statutes and regulations that are identified in the Compliance Supplement.
- **2 CFR 200.303; 2 CFR 200.318-320; https://www.ecfr.gov/current/title-2/subtitleA/chapter-II/part-200/subpart-E/subject-groupECFRea20080eff2ea53/section-200.47GAO-14-704G; GaDOE Rule 160-3-3; 2 CFR 200.403**

Indicator 5.1 – Internal Controls, Expenditures
Evidence/Documentation

5.1 –Evidence <u>shall</u> include:

A. Internal controls required to be in writing by 2 CFR Part 200
1. Allowability procedures
2. Segregation of duties
3. Procurement procedures
4. Method for conducting technical evaluations of competitive proposals and selecting recipients
5. Conflict of interest policy
6. Personal compensation policies (time and effort to include salaries, substitutes, stipends)
7. Travel policy

B. Evidence may include other recommended procedures not required to be in writing
1. Procedures to check suspension and debarment of vendor prior to making purchases above $25,000 threshold (across programs)

Indicator 5.1 Evidence/Documentation

5.1 –Evidence <u>shall</u> include:

C. Copy of FY 22 an FY 23 Title III EL & Immigrant payroll and expenditure detail reports organized by site, function, and object (include LEA Chart of Accounts crosswalk, when applicable)

D. Title IIIA source documentation for all requested expenditures

E. FY 22 & FY 23 Time and Effort records for Title III-funded staff

F. Special approval documentation (capital expenses, consolidation of administrative funds etc.)

G. LEA single audit report for the last two years

H. FY 22 Title III EL (and IMM, when applicable) General Ledger

I. Documentation to support how suspension and debarment is checked prior to making purchases above $25,000 threshold (across programs) from single vendor

J. Source documentation to support administrative cost charges per grant.

Indicator 5.1
Pro Tips

1. All expenditures must be included in the approved Title IIIA budget.
2. FY 22 and FY 23 Title IIIA English Learner and Immigrant, when applicable, Expenditure Detail Reports submitted as financial system reports, not Excel documents.
3. Documentation of collection of PD participants' "evidence of learning" should be **prior** to payment of stipends for PD participation, per GA State Board Rule 160-3-3.04.

Indicator 5.1
Common Misunderstandings

- Unallowable and/or unapproved items purchased (Ex: ESOL classroom supplies, food, clothing, furniture, ESOL teacher PD, nonEL related PD)
- Title IIIA financial policies and/or documentation not mentioned in written procedures
- Budget in LEA's financial software and current Title IIIA approved budget do not match
- Expenditures in Function & Object exceed approved budget
- Time/Effort – PARS not reconciliated to match percentages budgeted
- Limited source documentation for Title IIIA funded activities
- Title IIIA plans not implemented in a timely manner

Indicator 5.2
Explanation

- Inventory internal controls required to be in writing by 2 CFR Part 200 are present and meet requirement for internal controls:
  - Funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.
  - Maintenance procedures to keep the property in good condition.
  - **2 CFR 200.313; 2 CFR200.439**

Indicator 5.2 - Inventory Evidence/Documentation

5.2 –Evidence <u>shall</u> include:
  A. **Written procedures** for managing equipment (including replacement equipment) until disposition takes place to include:
      1. Acquisition of equipment
      2. Method of entering information into the LEA's inventory management system
      3. Off-site use of equipment
      4. Physical inventory
      5. District Equipment Disposition
      6. Adequate safeguards related to loss, damage, or theft of equipment
      7. Funds, property and other assets are safeguarded against loss from unauthorized use or disposition
      8. Equipment use for private schools
      9. Maintenance procedures to keep the property in good condition
  B. All **purchase orders** documenting purchase of equipment with federal funds
  C. **Inventory records** with all required components
  D. Records/logs of dates (at least every two years) that **physical inventories** were conducted at the LEA and schools with date and signature of person conducting the inventory.

Indicator 5.2 - Inventory
Pro Tips

1. Inventory **must** include each of the following elements:
   - Item description
   - Cost
   - Source of funding
   - FAIN (Will include different FAINs, indicating the fiscal year of purchase.)
   - Date of purchase
   - Serial or other identification number
   - Location
   - Use
   - Condition of property
   - Disposition of equipment (as applicable)
2. Record of a physical review of Title III, Part A purchased equipment at least once every two years.

More information in the Inventory chapter of the *Federal Programs Handbook*.

Indicator 5.2
Common Misunderstandings

- Incomplete written procedures for maintaining inventory

- Written procedures inconsistently implemented

- Incomplete inventory documentation - missing required elements, such as: FAIN, date inventory conducted, signature of person conducting biennial physical inventory check, etc.

- Incomplete inventory lists – Is all equipment purchased with Title IIIA funds in the past five years on this list?

Indicator 5.3
Explanation

- Cash management internal controls specific to the drawdown of funds required to be in writing by 2 CFR Part 200 are present and meet requirements for internal controls.

- **Federal Programs Handbook; 2 CFR 200.302(b)(6); 2 CFR 200.305**

- The LEA minimizes the time elapsing between the transfer of funds and disbursement by the grantee or subgrantee.

- The LEA's requests for federal funds are evaluated, and drawdowns of federal cash are only for immediate needs.

- The LEA reconciles drawdown requests as needed and maintain supporting documentation.

- **Federal Programs Handbook; 2 CFR 200.305; 2 CFR 200.302 (b)(6); 2 CFR 200.303(a), GAO-14-704G -10.03, 10.12-10.14**

Indicator 5.3 – Drawdowns, Cost Principles Evidence/Documentation

5.3 –Evidence <u>shall</u> include:

A. Written cash management (payment) procedures

B. FY 22 & FY 23 Title III DE0147s including supporting accounting records

C. LEA reconciliation of drawdown requests and supporting documentation

Indicator 5.3
Common Misunderstandings

- Drawdowns not submitted in a timely manner

- Drawdown amounts not matching expenditure amounts

- Title IIIA Completion Reports that don't align with the most recently approved budget

- Title III Director's signature not on drawdown requests (recommended)

Indicator 17

Title III, Part A – Language Instruction for English Learners (EL) and Immigrant (IMM) Students

Indicator 17.1
Explanation

- *The LEA follows standardized statewide entrance and exit procedures and assesses all potential English learners (ELs) within 30 days of enrollment in a school.*
- **ESEA: SEC. 3113(b)(2)**

Indicator 17.1 – EL Entrance & Exit Evidence
Evidence/Documentation

A. Written policy, written procedures, and processes, including persons responsible for monitoring implementation of procedures, aligned to standardized statewide entrance and exit procedures for identifying English learners and Immigrant children and youth. Procedures should include EL identification procedures for new and transfer students, process to identify students with an IEP and/or those suspected of having a disability, exit and reclassification process, how student EL status information is shared with relevant staff making placement decisions and how status and program services are reported in the LEA's Student Information System (SIS), including who is responsible for submitting comments to relieve data collection errors.

B. Completed *Title IIIA Data Rosters* submitted via secure MyGaDOE portal email (contains Personally Identifiable Information - PII).

C. Selected EL student records submitted via secure MyGaDOE portal email (contains PII).

D. Source documentation of annual state/local training on state reporting of EL and immigrant data elements for applicable staff (data entry staff). Documentation includes items such as: attendance records, agendas, and presentations.

CORE English Learner Documentation (PII)

Selected EL student records should contain the following documentation:

1. Original, signed, and dated HLS in a language parents understand

2. ELP Screener scores and DATE OF ELP SCREENER

3. Annual signed and dated parent waiver, if applicable

4. Annual ELP Assessments

5. EL Reclassification Form, if applicable

6. Monitoring documents for ELs who have exited EL status (EL-1 and EL-2), if applicable

EL Language Programs – State Guidance, p. 25

Indicator 17.1
Pro Tips

1. Written EL and Exit procedures should describe the processes implemented **in the LEA** and should not be a reiteration of guidance provided by GaDOE.

2. Refer to the *LEA Title III Required Written Procedures* document to ensure that all required processes are included.

Indicator 17.1
Common Misunderstandings

- Inaccurate, incomplete, or outdated written procedures
- Lack of evidence of LEA monitoring the correct written EL entrance and exit procedures
- English-only, missing HLS or HLS with the incorrect questions
- Multiple ELP Screeners for the same student with conflicting results
- Missing ELP Screener scores
- Date of ELP Screener **after** date of previous ACCESS
- Lack of annually signed parent waiver of ESOL services, if applicable
- Communication with parents only in English when they requested communication in another language
- Not completing an *EL Reclassification Form* for all students within the LEA's flexible exit criteria range
- Students erroneously exited from EL status or didn't exit when they should have
- Students are coded as Title III-served when they are not receiving ESOL services 1st (such as parents opt students out of ESOL, or an EL/SWD is not receiving ESOL, or any other reason)

Indicator 17.2 Language Instruction Educational Programs (LIEPs) for English Learners (ELs) Explanation

17.2.

LEAs receiving Title IIIA funds shall use the funds:
to increase the English proficiency of English learners by providing effective language instruction educational programs that meet the needs of English learners and demonstrate success in increasing –
    (A) English language proficiency and
    (B) student academic achievement

ESEA: Sec. 3115(c)(1)(A-B)

Indicator 17.2
Effective Language Instruction Programs
Evidence/Documentation

A. Description of the LEA's supplemental Title III, Part A language instruction educational programs (LIEPs) and instructional goals. *Indicator 1.3 requires LIEP effectiveness data and summary statements of students' English language proficiency (ELP) and academic achievement.* Description may include procedures for determining which supplemental LIEP to provide, in which schools, and for which EL students, based on ELP and academic data and student needs as identified in the CNA and CLIP.

B. Source documentation for implementation of LIEP activities in FY22 and FY23 to date. Documentation may include tutoring or summer school student and teacher attendance records, tutoring or summer school lesson plans, software usage, progress and data reports, observation documentation, school level implementation plans, software implementation plans, etc.

Indicator 17.2
Pro Tip

- Part of the LEA's description might be the LEA's response to Question 2 of the EL Program Plan submitted with the budget.

Indicator 17.2
Common Misunderstandings

Language Instruction Educational Programs (LIEPs)

- Missing or limited description of LEA's Title IIIA language instruction educational program/Title III-funded activities, interventions, strategies

- LEA provided description of ESOL program or supplies purchased for ESOL program instead of Title IIIA LIEP

- No evidence of implementing an LIEP

Indicator 17.3 – EL-Focused Professional Development Explanation

17.3. LEA staff (including non-ESOL teachers, principals and other school leaders, administrators, and other school or community-based organizational personnel) participate in professional development opportunities that are:

- Designed to improve the instruction and assessment of ELs;
- Designed to enhance the ability of such teachers, principals, and other school leaders to understand and implement curricula, assessment practices and measures, and instructional strategies for ELs;
- Effective in increasing EL students' English proficiency or substantially
  increasing the subject matter knowledge, teaching knowledge and teaching skills of such teachers; and
- Of sufficient intensity and duration (does not include one-day workshops and conferences) to have a positive and lasting impact on the teachers' performance in the classroom.

ESEA: Sec. 3115(c)(2)(A-D)

Indicator 17.3 – EL-Focused Professional Development
Evidence/Documentation

A. Description of the LEA's Title III, Part A EL focused professional development (PD) plan and implementation of the plan. *Indicator 1.3 requires PD effectiveness data and summary statements of teachers' and school leaders' ability to teach and assess EL students.* Description may include:

- Process for determining PD content and participants based on effectiveness data and teacher/leader needs.

- How PD was designed to improve the instruction and assessment of English Learners (ESEA Sec. 3115(c)(2)(A).

- How PD was designed to enhance the ability of teachers, principals, and other school leaders to understand and implement curricula, assessment practices and measures, and instructional strategies for ELs (ESEA Sec. 3115(c)(2)(B).

- Title III, Part A EL Focused PD Plan.

Indicator 17.3 – EL-Focused Professional Development Evidence/Documentation Cont.

B. Source documentation of PD Plan activities implemented in FY22 and FY23 to date, to include:

i. Meeting dates/times as evidence of "sufficient intensity & duration".

ii. Dated sign-in sheets with participant roles noted, as evidence that PD was provided to "non-ESOL teachers, principals and other school leaders, administrators, and other school or community-based organizational personnel".

iii. Agendas, handouts, presentations, and other materials as evidence of EL focused topics.

iv. Documentation from principals and/or teachers that PD had a positive impact on classroom practices.

a. May include administrators' walk-through observation summary data and/or teachers' feedback or self-reports, notes from principal or instructional coaches' walkthroughs or observations, teacher lesson plans documenting implement EL strategies and/or activities, etc.

v. Documentation of effectiveness of EL-specific curriculum support products produced by Title III funded staff, or ESOL endorsement activities, or other activities of Title III funded staff, as applicable.

Indicator 17.3
Pro Tips

1. Have EL-focused PD documentation for each training organized into session-specific folders that contain the agenda, sign in sheet, presentation materials and other supporting documentation.

2. Please do not submit documentation of ESOL related meetings/trainings, such as ESOL Lead Teacher meetings, ACCESS training, scheduling meetings, etc.

Indicator 17.3
Common Misunderstandings

Professional Development (PD)

- Not provided for all required stakeholders
  (General education teachers of ELs, ESOL teachers, principals and other school leaders/administrators)

- No EL-Focused PD Plan

- PD is not ongoing nor sustained (is not of sufficient intensity & duration) – only includes short-term workshops & conference attendance

- Incomplete PD agendas (no PPTs or minutes showing the topic)

- Sign-In sheets missing participants' roles

- Not implementing PD Plan in a timely manner

Indicator 17.4 Parent Engagement to Enhance / Supplement LIEPs
Explanation

The LEA provides and implements other effective activities and strategies that enhance or supplement language instruction educational programs for English learners, which shall include:

a. Parent, family and the community engagement activities

b. Strategies that serve to coordinate and align related programs, such as Title I EL parent engagement and outreach programs

ESEA Sec. 3115(c)(3)

Indicator 17.4
Other Effective Activities & Strategies
Evidence/Documentation

A. Description of the parent, family, and community engagement (PFE) activities.

Indicator 1.3 requires PFE effectiveness data and summary statements of parents' participation in the education of their children to improve English language proficiency and academic achievement. Description may include:

- Procedures for determining how to engage EL parents in the students' supplemental language program, in specific schools, and for specific parents, when applicable.
- Title III, Part A Parent Outreach Program Plan.

B. Communications (in English and other languages) to promote EL parent, family and community outreach and engagement opportunities in the education of their children.

Indicator 17.4
Other Effective Activities & Strategies
Evidence/Documentation Cont.

C. Source documentation of EL parent, family, and community outreach and training activities in FY22 and FY23 to date, to include agendas, dated sign-in sheets, presentations, meeting notes, handouts, training documentation, etc. *Documentation of ESOL Program parent meetings and/or Title I, Part A activities does not meet the Title III, Part A requirement.*

D. *EL Parent Interview Report* provided by GaDOE to LEA.

EL Parent Interview Questions

Parents' perspective on:

- Registration processes - HLS, Screening, EL designation, yearly ACCESS results
- Child's supplemental English language program, goals, & progress
- Activities, programs, classes or meetings to build parents' capacity
- School communication in general, including PTA meetings, parent/teacher conferences

Indicator 17.4
Pro Tips

1. Have the documentation for parent, family and community engagement activities organized into session-specific folders that contain the agenda, sign in sheet, presentation materials and other supporting documentation.

2. Please do not submit documentation of Title IA parent meetings, parent compact or the LEA's parent-family engagement policy.

Indicator 17.4
Common Misunderstandings

Parent & Family Engagement (PFE)

- Limited evidence of parent outreach *activities* to enhance or supplement the Title IIIA-funded language programs
- Only ESOL-focused *meetings* (ACCESS scores, ESOL program and placement, etc.)
- Activities do not build parents' capacity to help their children improve English and academics
- No evidence of a Title IIIA PFE program

Indicator 17.5
Explanation

- The LEA receiving a Title IIIA Immigrant subgrant expends these funds to pay for activities that provide enhanced instructional opportunities for immigrant children and youth, in one or more of the ways listed in Sec. 3115(e).

- **ESEA: Sec. 3115 (e)**

Indicator 17.5 – Immigrant Program Evidence/Documentation

A.Description of specific activities implemented to support immigrant students' wellbeing and sense of connectedness as they adapt to school climate and community in the U.S. and linguistic needs, when applicable. *Indicator 1.3 requires immigrant program effectiveness data and summary statements of students', families', and communities' adjustment to and achievement in U.S. schools.* Description may include:

   i. Procedures for determining which immigrants, families, communities, and which schools were targeted for these activities

   ii. Persons/positions involved in the decision-making processes and how final programs were established

   iii. Alignment of activities to categories of activities in Sec. 3115(e).

Indicator 17.5 – Immigrant Program Evidence/Documentation Cont.

B. Source documentation of Title III funded immigrant program activities in FY21 and FY22 (when applicable), such as student and teacher attendance rosters, tutoring and/or summer school lesson plans, software usage reports, agendas, sign-in sheets, presentations, training documentation for personnel working with immigrants, personnel job descriptions, activity schedules/calendar, etc.

Indicator 17.5
Pro Tips

- Ensure that your LEA's list of Immigrant students is accurate and up-to-date

- Maintain a list of the Immigrant students who were served in categories   C, D, E and/or F (Sec. 3115(e))

- Not all Immigrant students are English learners so language instructional services may not be a need.

Indicator 17.5
Common Misunderstandings

Immigrant Program **(if applicable)**

- Not implementing program plan in a timely manner in the same year funds are received for immigrant students

- Focusing on English language acquisition and ignoring English speaking immigrants

- No evidence of learning packet distribution to students/families

- Confusing immigrant students with English learners or with migrant students.

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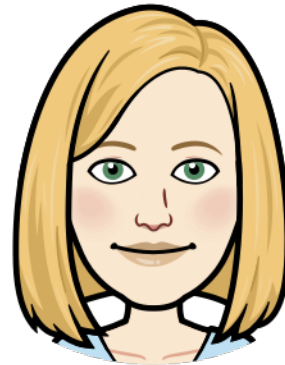
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Title III, Part A Q & A Session on the CFM Pre-Recorded Webinar
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