

Title III, Part A – Common CFM Findings

Indicator 1 - Self-Monitoring

- Lack of evidence that it is occurring
- Lack of evidence that the Title III Program implementation is being monitored
- Lack of Title III Budget reconciliation or limited attention to budget expenditures
- Inconsistent following of LEA's written procedures

Indicator 2 – CLIP

- Lack of documentation of English Learner stakeholders at meetings

Indicator 3 - Private Schools

- No evidence of ongoing consultation with participating private schools

Indicator 4 – EL ACCESS Participation Rate

- LEA rate is less than 95%
- LEA's reasons for nonparticipation are not valid

Indicators 5.1.a & b - Fiduciary

- Purchasing unallowable and/or unapproved items (e.g. for the ESOL classroom)
- Purchasing items for exited EL students (EL=1, EL=2, EL=3, or EL=4)
- Incomplete financial policies
- Not following LEA's written internal control procedures
- Budget in LEA's financial software not matching LEA's current Title III-approved budget
- Expenditures at Function & Object code level exceeding approved Title III-budget
- Time/Effort - PARS not reconciliated
- Carrying over a large percentage of grant funds - Not implementing program plan in a timely manner in the same year funds are received

Indicators 5.2.a & b = Inventory

- Missing required elements (such as the FAIN, date inventory conducted, etc.)
- Missing signature of person conducting inventory
- Incomplete inventory lists (T3A-purchased equipment)



Indicator 5.3 - Drawdown Requests

- Timeliness of drawdowns
- T3A Director's signature on requests (recommended)
- Drawdown amounts not matching expenditure amounts
- Drawing down indirect cost rate based on allocation, not expenditures.

Indicator 18.1 - EL Entrance Exit Procedures

- Inaccurate/incomplete written procedures
- Mis-identified students
- Incorrect HLS
- Administering Screener more than once
- Missing/inaccurate ELP Screener scores for students screened in District
- Date of ELP Screener **after** date of previous ACCESS
- Not completing an *EL Reclass Form* for **all** students within the LEA's flexibility exit criteria range
- Out-dated procedures (e.g. still using LAC)
- ESOL-No students coded as Title III-served students
- *Recommendation:* Communication with parents only in English
- *Recommendation:* Lack of annually signed parent waiver of ESOL services

Indicator 18.2 - Language Instruction Educational Program (supplemental to ESOL)

- Not providing a supplemental language program beyond ESOL to EL students who need more language instruction
- Description of ESOL program or supplies purchased for ESOL program only
- Lack of evidence analyzing EL students' progress toward English proficiency (ACCESS)
- Lack of evidence analyzing EL student's academic achievement in core content (GA Milestones)
- No evidence of efforts to determine the effectiveness of Title III interventions, strategies, activities

Indicator 18.3 - Professional Learning

- Not providing EL-focused Professional Learning opportunities for **all** required stakeholders (general education teachers of ELs, ESOL teachers, and administrators)
- No Title IIIA PL Plan
- PL is not ongoing nor sustained (of sufficient intensity & duration)
- PL only includes short-term workshops & conferences
- "PL" only includes ESOL teacher meetings to ensure ESOL teachers are fulfilling their ESOL teacher requirements
- Incomplete agendas (no PPTs, handouts, time spent on T3 activities noted)
- Sign-In sheets missing participants' role

Indicator 18.4 - Parent Engagement

- Does not support implementation of the LEA's Title III supplemental Language Instructional Education Program (LIEP)
- No evidence of any parent **outreach** activities directly related to the *Title III-funded language program* – only ESOL Program meetings (43% of monitored LEAs in FY19)

Note: *Can't supplement for parents a program for students (items budgeted in Function 1000) that doesn't exist.*

Indicator 18.5 - Immigrant Program (when applicable)

- Unallowable expenditures
- *Recommendation:* Providing a program for only EL immigrant students, nothing for non-ELs.
- *Recommendation:* Not implementing program plan in a timely manner in the same year funds are received for immigrant students.