Kentucky Department of Education
Office of Continuous Improvement and Support
Title I, Part A District Desk Monitoring Checklist

District:
Superintendent:
Finance Officer:
Title I, Part A Coordinator:
Date(s) of Desk Monitoring:
KDE Monitoring Staff:

The following checklist is used in the desk review of a district's Title I, Part A activities. Program compliance and/or effectiveness is determined based on supporting evidence for each of the monitoring indicators.

This tool directly aligns with the Title I, Part A requirements of the Every Student Succeeds Act (ESSA) and the Education Department General Administrative Regulations (EDGAR) as well as additional requirements in Kentucky Revised Statutes (KRS) and Kentucky Administrative Regulations (KAR).

The lists of required documentation within each monitoring section are those things the district must provide for the Kentucky Department of Education (KDE) review. However, KDE staff may request additional pieces of evidence on an as needed basis. Further, only documentation for the current school year must be submitted unless the program monitor(s) request(s) prior year information or it is applicable to the question. For districts and schools utilizing Title 1 Next (T1N), KDE consultants will receive temporary access to review documentation saved to the T1N platform. Districts and schools not utilizing T1N will submit documentation via email.

Please ensure any personally identifiable information (PII) such as student names, addresses or other personal identifiers that are linked or linkable to a specific person is redacted prior to submitting evidence for KDE review. If PII is submitted, KDE will request that the district resubmit redacted versions.

During monitoring, the program monitor(s) will select an indicator for each monitoring item:

- **Exceeds Requirements** – Means the district goes beyond the minimum compliance requirements of Title I, Part A statute or regulation in the implementation of its program.
- **Meets Requirements** – Means the district meets the minimum compliance requirements of Title I, Part A statute or regulation in the implementation of its program. In this case a recommendation may be issued.
- **Doesn't Meet Requirements** – Means the district does not meet the minimum compliance requirements of Title I, Part A statute or regulation in the implementation of its program. In this case, a finding will be issued.
- **Not Applicable** – Means the compliance requirement does not apply to the district.

Best practices, found at the end of the checklist, are examples of practices or procedures that KDE staff have observed in other districts that may enhance program effectiveness.

If you need clarification on a question or with understanding more about the monitoring tool, feel free to contact a Title I, Part A consultant at (502) 564-3791.

I. Foster Children and Youth

Foster Children and Youth Monitoring Indicator
1. The district collaborates with the local child welfare agency (CWA) to develop and implement a transportation agreement containing clear written procedures for how transportation will be provided, arranged and funded for the duration of a child's time in foster care. [See ESSA 1112(c)(5).] These procedures shall— a. Ensure that children in foster care needing transportation to the school of origin will promptly receive transportation in a cost-effective manner and in accordance with Section 475(4)(A) of the Social Security Act (42 U.S.C. 675(4)(A))); and b. Ensure that, if there are additional costs incurred in providing transportation to maintain children in foster care in their schools of origin, the local education agency (LEA) will provide transportation to the school of origin if— • The local CWA agrees to reimburse the local educational agency for the cost of such transportation; • The LEA agrees to pay for the cost of the transportation; or • The local educational agency and the local CWA agree to share the cost of such transportation. *Please note that the district enrollment policy does not meet the requirements of the written transportation agreement. Refer to KDE's ESSA Foster Care Transportation Guidance for requirements.* **Required Documentation: (1) A written transportation agreement** between the local educational agency and the local child welfare agency signed and dated by the superintendent and child welfare agency representative. **(2) Evidence of collaboration between the local child welfare agency** and the local educational agency for the development of the transportation agreement which could include, but not limited to, meeting agendas and minutes, email communication, telephone logs or other strong sources of documentation to show evidence of collaboration. **District Compliance:** ☐ Not Applicable ☐ Doesn't Meet Requirements ☐ Meets Requirements ☐ Exceeds Requirements **Notes:**

II. Supplement, Not Supplant

Supplement, Not Supplant Monitoring Indicator
1. The district's supplement, not supplant methodology includes the following information: • An account of the distribution of state and local funds, including staff, resources and services such as professional development, in a Title I-neutral manner, including all state and local funds that thedistrict uses for the education of students; • An account of the staffing and services allocations with real calculations and numbers to support it,which may be based on the staffing allocation districts already provide to KDE; • An accompanying narrative to explain the funding and staffing distributions, which year's enrollment is being used, and affirm how funds and staff were distributed according to the methodology. • Supporting documentation. [See ESSA 1118(b).] *Please note, some districts are exempt from the supplement, not supplant methodology requirement. The monitoring notification letter the district receives from KDE will indicate if the district is exempt*

Supplement, Not Supplant Monitoring Indicator
from this requirement. Please see the U.S. Department of Education informational document, Question 26, p. 20 for information on exemptions. **Required Documentation:** Unless exempt, the district's supplement, not supplant methodology and data with real calculations that supports the district's methodology. **District Compliance:** ☐ Not Applicable ☐ Doesn't Meet Requirements ☐ Meets Requirements ☐ Exceeds Requirements **Notes:**

III. Comparability

Comparability Monitoring Indicator
1. The documentation provided supports the data used to complete the most recently approved Comparability Report for districts required to calculate comparability. [See ESSA 1118(c).] KDE staff must verify the following matches the approved comparability report: • Date of data pull • Enrollment numbers • Full-time equivalency (FTE) staffing lists • Salary data (as applicable, if salary data was used to demonstrate comparability) **Required Documentation: (1)** Enrollment Summary Reports from Infinite Campus with an effective date that matches the date listed on the most current, approved Comparability Report and **(2)** staffing list by location and funding source with the FTE of each position. The list should clearly delineate the staff counted toward the comparability report (instructional staff paid with state and local funds) as well as staff excluded from the report (staff paid with federal funds). Please note: Districts using salary comparison to demonstrate comparability must provide salary data that supports the most current, approved Comparability Report rather than FTE staffing reports. **District Compliance:** ☐ Not Applicable ☐ Doesn't Meet Requirements ☐ Meets Requirements ☐ Exceeds Requirements **Notes:**

IV. Fiscal Management

Fiscal Management Monitoring Indicators
1. The evidence provided demonstrates that school allocations are consistent with those in last year's approved application. Separate accounting of Title I funds is maintained in Enterprise ERP (EERP, formerly MUNIS) by the individual school. [See ESSA Sections 1113 and 8306 and Parts 76 and 200 of EDGAR.] **Required Documentation:** Detailed month-to-date EERP budget report broken down by location with purchase order-level details for the **previous fiscal year** showing all projects (310K, 310KM and, if applicable, 310KN and 310KP) budgeting and expenditures to date. **District Compliance:** ☐ Not Applicable ☐ Doesn't Meet Requirements ☐ Meets Requirements ☐ Exceeds Requirements

Fiscal Management Monitoring Indicators
Notes:
2. Expenditures are allowable and meet the intent of Title I, Part A. Expenditures are consistent with the types of expenditures in the approved application. [See ESSA Sections 1114, 1115, 1118 and 8306 and Parts 76 and 200 of EDGAR.] **Required Documentation:** Detailed month-to-date EERP budget report broken down by location with purchase order-level details for the **previous fiscal year** showing all projects (310K, 310KM, and if applicable 310KN and 310KP) budgeting and expenditures to date. **District Compliance:** ☐ Not Applicable ☐ Doesn't Meet Requirements ☐ Meets Requirements ☐ Exceeds Requirements **Notes:**
3. The district has appointed an individual to serve as the homeless liaison. The liaison has successfully completed and passed the required annual training approved by KDE for the current year. [See McKinney-Vento 11432(g)(1)(J)(ii) and 704 KAR 7:090.] **Required Documentation:** Accurate homeless liaison listed on the district's Open House webpage, training certificate for the current school year's required annual KDE liaison training. **District Compliance:** ☐ Not Applicable ☐ Doesn't Meet Requirements ☐ Meets Requirements ☐ Exceeds Requirements **Notes:**
4. The amount reserved for homeless services on last year's approved application matches the amount budgeted in EERP. Funds are spent in a timely manner in the fiscal year for which they are reserved to meet the needs of eligible students. Expenditures for homeless services are allowable and meet the intent of Title I, Part A. Expenditures are consistent with the types of expenditures in the approved application. [See ESSA Sections 1113, 1118 and 8306 and Parts 76 and 200 of EDGAR.] **Required Documentation:** Detailed month-to-date EERP budget report for the previous (310K) fiscal year showing the amount budgeted for homeless expenditures aligns with the amount listed on the FY2024 Grant Management Application and Planning system (GMAP) District Set-Aside page. *KDE may request to see specific purchase orders and/or invoices based on the EERP review.* **District Compliance:** ☐ Not Applicable ☐ Doesn't Meet Requirements ☐ Meets Requirements ☐ Exceeds Requirements **Notes:**
5. The amount reserved for parent and family engagement activities on last year's approved application matches the amount budgeted in EERP. If the district is required to reserve parent and family engagement funds, at least 90% of the required 1% parent and family engagement reservation is distributed to schools. Expenditures for parent and family engagement activities are allowable and meet the intent of Title I, Part A. Expenditures are consistent with the types of expenditures in the approved application. [See ESSA Sections 1116 and 1118, and 8306 and Parts 76 and 200of EDGAR.]

Fiscal Management Monitoring Indicators
Required Documentation: Detailed month-to-date EERP budget report for the previous (310KM) fiscal year showing the amount budgeted for parent and family engagement expenditures aligns with the amount listed on the FY2024 GMAP District Set-Aside page. *KDE may request to see specific purchase orders and/or invoices based on the EERP review.* **District Compliance:** ☐ Not Applicable ☐ Doesn't Meet Requirements ☐ Meets Requirements ☐ Exceeds Requirements **Notes:**
6. The evidence provided demonstrates that private school allocations are consistent with those in last year's approved application. Expenditures for private schools are allowable and meet the intent of Title I, Part A. Expenditures areconsistent with the types of expenditures in the approved application. [See ESSA Sections 1117 and 8306 and Parts 76 and 200 of EDGAR.] **Required Documentation:** Detailed month-to-date EERP budget report for the previous (310KN and 310KP) fiscal year showing the amount budgeted for private school expenditures aligns with the amount listed on the FY2024 GMAP Services to Private Schools page. *KDE may request to see specific purchase orders and/or invoices based on the EERP review.* **District Compliance:** ☐ Not Applicable ☐ Doesn't Meet Requirements ☐ Meets Requirements ☐ Exceeds Requirements **Notes:**
7. The evidence provided demonstrates the district has in place internal controls (such as a written process or procedure) to effectively monitor the expenditure of funds in meeting the 15% carryover provision. If the district was granted a carryover waiver within the previous three years, this may indicate internal controls are not in place or are not being followed. [See 2 CFR 200.303.] **Required Documentation: (1)** Description of the internal controls for monitoring the expenditure of funds in meeting the 15% carryover provision and **(2)** evidence that the internal controls are being implemented with fidelity (examples: agendas and detailed minutes from regular meetings between leadership and school administration, emails or communication providing regular expenditure updates, or a narrative describing the process for monitoring the timely expenditure of funds). **(3) If applicable**, email approval of the carryover limitation waiver request if one was requested. **District Compliance:** ☐ Not Applicable ☐ Doesn't Meet Requirements ☐ Meets Requirements ☐ Exceeds Requirements **Notes:**

Best Practices

The following examples are practices or procedures that KDE staff have observed in other districts which may enhance program effectiveness. Please note the list is not all inclusive.

Foster Children and Youth

- The district can demonstrate collaboration on a regular basis with the local child welfare agency to ensure educational stability.
- No complaints regarding transportation of students in foster care to their schools of origin have been filed.
- Staff can articulate the dispute resolution process and have access to the documentation regarding the dispute resolution process.

Fiscal Management

- Receipts and/or detailed invoices from vendors such as Amazon, Walmart and Oriental Training Company are saved to document specific items purchased.
- Food purchases for parent and family engagement events are limited in relation to the size of the district allocation, and no meals have been purchased.
- EERP reports match the approved Title I application in GMAP.
- Allocations and uses of funds match those in the approved application.
- The 15% carryover monitoring process includes multiple checks throughout the year with finance to ensure the limitation will be met within the first 15 months of the grant period.
- Title I records are maintained for five years.