

The background is a composite image. The top left shows a line of yellow school buses with 'SCHOOL BUS' written on the front. The bottom left shows a classroom with blue walls, desks, chairs, and educational materials. A white diagonal line separates the two images.

Title I, Part A Program Documentation Training

Demonstrating compliance and preparing for monitoring



Kentucky Department of
EDUCATION

Agenda

- Monitoring checklists
- Checklist terminology and citations
- Documentation reminders
- File format
- Evaluation of evidence
- Evidence examples
 - District consolidated monitoring checklist
 - Schoolwide program monitoring checklist
 - Targeted assistance program monitoring checklist

Program documentation training webinar

- The information in this presentation is covered in the Title I, Part A Program Documentation Training webinar. Use the following timestamps to navigate to a specific topic.
 - Monitoring checklists 0:55
 - Checklist terminology and citations 1:59
 - Documentation reminders 10:44
 - File format 13:00
 - Evaluation of evidence 18:56
 - Evidence examples
 - District consolidated monitoring checklist 20:10
 - Schoolwide program monitoring checklist 45:43
 - Targeted assistance program monitoring checklist 54:59

Monitoring checklists

- Title I, Part A monitoring checklists are available on the [Title I, Part A Documents and Resources](#) webpage.
 - Desk Monitoring
 - District Consolidated Monitoring
 - Schoolwide Program Consolidated Monitoring
 - Targeted Assistance Program Consolidated Monitoring
- Each indicator includes a list of suggested and/or required documentation which could be used to demonstrate compliance.
- The Kentucky Department of Education (KDE) recommends using the checklists as reference tools when determining what documentation to save.

Checklist terminology

- **Policy** – A course or principle of action.
- **Process** – A high-level operation spanning the organization which consists of the various functions necessary to accomplish a specific task.
- **Procedure** – An established way of doing something which outlines the order of specific steps required to achieve an end result.
- “Detailed”
- “Other strong documentation”

Personally Identifiable Information (PII)

- Information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual.
- **Never** submit documentation containing PII. The following PII should be redacted from documentation prior to saving:
 - Student's name
 - Student's parent/guardian or other family member names
 - Student's or family's address
 - Personal identifiers, such as social security, student ID number, etc.
 - Other direct identifiers, i.e., student's date of birth, place of birth, and mother's maiden name

Checklist citations and references

- Federal
 - Every Student Succeeds Act (ESSA)
 - McKinney-Vento Homeless Assistance Act
 - Education Department General Administrative Regulations (EDGAR)
 - Example citation: 34 CFR 75.1
 - Uniform Grant Guidance (UGG)
 - Example citation: 2 CFR 200.1
 - Non-regulatory guidance
- State
 - Kentucky Administrative Regulation (KAR)
 - Kentucky Revised Statute (KRS)

Documentation reminders

- Districts selected for monitoring are instructed to provide KDE with approximately one to two pieces of relevant documentation for each indicator on the checklist.
- Unless otherwise specified on the checklist, only documentation for the current school year should be submitted to KDE.
- Upload evidence no later than two weeks prior to your monitoring visit to ensure KDE has ample time to review.
- Contact KDE with any questions regarding suggested or required documentation listed on the monitoring checklists.

File format

- Submit digital copies whenever possible as opposed to scanning printed documents.
- Save evidence as individual files rather than one large file with pieces of evidence for multiple indicators.
- Assign clear names to each file which provide the reviewer with a general idea of the contents without having to open the file.
- Refrain from submitting links to documents stored in an online storage space such as Google Drive.
- Provide context for any photos submitted as evidence.

Evidence already accessible by KDE

- KDE consultants have access to the Cognia Continuous Improvement Platform as well as the Grant Management Application Planning (GMAP) system.
 - Needs Assessment
 - Comprehensive District and School Improvement Plans (CDIP and CSIP)
 - District and School Professional Development Plans
 - Title I, Part A application
 - Completed and signed equitable services consultation packets
 - Comparability report Excel workbook
 - Email approvals
 - Waiver to operate a schoolwide program in a school under 40% poverty
 - 15% carryover limitation waiver

Evaluation of evidence

- **Exceeds requirements** – The district/school goes beyond the requirements of Title I, Part A statute or regulation in the implementation of its program. KDE may identify strengths and best practices.
- **Meets requirements** – The district/school meets the minimum requirements of Title I, Part A statute or regulation in the implementation of its program. KDE may issue recommendations which could enhance program effectiveness.
- **Does not meet requirements** – The district/school does not meet the minimum requirements of Title I, Part A statute or regulation in the implementation of its program. KDE will issue a finding and require action(s) to address the area of noncompliance.

District Consolidated Monitoring Checklist

Eligible public schools and allocations

- Appropriate and effective allocation of funds.
- Facilitating effective transitions from middle to high school and high school to postsecondary.
- Reducing the overuse of discipline practices that remove students from the classroom.
- Addressing disparities that result in low-income and minority students being taught at higher rates by ineffective, inexperienced or out-of-field teachers
- Stakeholder consultation/participation in CDIP development.
- Accurate enrollment and low-income counts used in the GMAP application.
- School allocations on the application are being followed.
- Waiver to operate a schoolwide program in a school under 40% poverty.

Institutions for neglected children

- Accurate child count data submitted to KDE.
- Effective consultation regarding services.
 - Services are based on student need.
 - Sufficient funds have been allocated for services.
 - Services are comparable to those received at public schools.

Foster children and youth

- Foster care point-of-contact (POC) listed on the Open House webpage.
- Ensuring children in foster care remain in their school of origin (SOO) unless it is determined to not be in the child's best interest.
- Immediately enrolling the child in another school if staying in the SOO is not in their best interest.
- Immediately contacting the school last attended to obtain relevant records.
- Written transportation agreement developed with the local child welfare agency and evidence of collaboration.

Homeless children and youth

- Trained homeless POC listed on the Open House webpage.
- Homeless posters on display in locations where parents can easily see them.
- Effectively identify, enroll and eliminate enrollment and attendance barriers for homeless children and youth.
- Written procedures for awarding credit (including partial credit) and diplomas to homeless children and youth.
- Professional development for supporting homeless children and youth.
- Homeless children and their families receive the services to which they are entitled.
- Homeless children and youth are effectively informed of available services and their rights.
- Funds reserved for homeless students are spent to meet the identified needs of eligible students.

English learners

- Effective means of outreach to parents of English learner (EL) students.
- Written notification of the student's identification as an EL and placement in a language instruction education program (LIEP) provided within the required timeframe.
- Evidence that funds spent on EL students, supplement and do not supplant the district's core EL program outlined in the Lau Plan (as applicable) and are only being used at Title I schools.

Parent and family engagement (1)

- Parent and family engagement (PFE) policy developed jointly with parents.
- Evidence that the activities outlined in the policy are taking place.
- Annual evaluation of the PFE program conducted with the involvement of parents.
- Evidence parents participate in decisions regarding how PFE funds will be spent.
- At least 1% of the allocation has been reserved for PFE (as applicable) and 90% of the PFE allocation has been distributed to schools.
- PFE funds are being used on allowable expenditures that meet the intent of the Title I, Part A program.
- Parents are notified of their right to request state or local policy on student participation in state testing as well as the right to request teacher qualifications.

District level program design and effectiveness

- Evidence the Title I, Part A program and funds are coordinated with other programs and funds.
- Evidence of coordination and integration with early childhood education including the transition to elementary school (as applicable).
- Written processes or procedures to ensure school-level Title I programs are being implemented effectively.
- Work in consultation with school-level personnel to analyze data and evaluate Title I program implementation and effectiveness.
- Ensure that all teachers and paraeducators working in Title I schools meet state certification or qualification requirements.

Services to eligible private school children

- Procedures to verify private school students come from participating attendance areas.
- Notification of private schools' right to participate.
- Completed and signed equitable services consultation packet.
- Processes to identify students who generate funds and students who qualify for services.
- Complaint policy and process.
- Evidence services provided align with the consultation packet and began at the same time as public-school services.
- Policies and procedures to oversee the program at the private school and assess its effectiveness.
- Appropriate documentation for staff providing services.
- Professional development opportunities.
- Parent and family engagement requirements.
- Materials and equipment are secular, neutral and non-ideological.

Fiscal management

- Evidence the district is following the approved Title I, Part A application.
- Supplement not supplant methodology and supporting documentation (if applicable).
- The district ensures purchases made with Title I funds are allowable.
- Assets purchased with Title I funds are being safeguarded.
- Equipment disposal policy and inventory of disposed items if applicable.
- Accurate data used in the most recent comparability report (if applicable).
- Record retention policies and procedures.
- The district monitors the timely expenditure of funds to meet the carryover limitation requirements.
- Evidence the 15% carryover limitation waiver was met or that a waiver was approved by KDE. If funds were carried over for homeless, PFE or private school services, those funds are being used for their original purpose.
- Written time and effort procedures and time and effort documentation for staff paid with Title I funds.
- Most recent two financial audits are free from Title I, Part A findings and only the Title I portion of the audit was paid for with Title I funds (if applicable).
- Written procedure for the receipt and resolution of complaints alleging a Title I, Part A violation.

Schoolwide Program Monitoring Checklist

Needs assessment

- Strategically using the needs assessment to prioritize funding sources.
- Analyzing data to identify and implement strategies and activities to address the needs.
- Involving stakeholders in the continuous improvement planning process.
- Documented need for staff such as counselors, nurses, media specialist, etc. (not including teachers and paraeducators) to improve student achievement (if applicable).

School program design and effectiveness (1)

- Assessment results are shared with stakeholders and used to identify needs and drive the teaching and learning environment.
- Periodic review of the implementation of and results achieved by the Title I program.
- Paraeducators with instructional duties work under the direct supervision of certified teachers.
- Staff paid with Title I funds have a proportionate amount of non-Title I duties.
- Professional development opportunities are identified, and strategies learned from professional development are monitored for effective implementation.
- The school includes activities to assist with transitions between applicable grade levels.
- Strategies are in place to effectively coordinate Title I funds with other program funds.

Parent and family engagement (2)

- Annual parent meeting.
- Parents and families have the opportunity to be involved in the planning, design and implementation of the PFE program.
- Written parent and family engagement policy developed jointly with parents.
- Evidence that the activities outlined in the policy are being implemented.
- Written school-family compact developed jointly with parents.
- Opportunities for communication between school staff and parents including frequent reports on their children's progress and discussion of the compact as it relates to individual student achievement goals during at least one elementary level parent conference.
- Notification when children are taught for four consecutive weeks by a teacher not meeting state certification requirements.

Targeted Assistance Program Monitoring Checklist

Needs assessment and selection of students

- Services align with the school's needs assessment.
- The school has an effective process in place for identifying students for services.
- Multiple, educationally-related criteria are used to select students for services based on the greatest academic need.
- Documented need for staff such as counselors, nurses, media specialist, etc. (not including teachers and paraeducators) to improve student achievement (if applicable).

School program design and effectiveness (2)

- Services align with the school's needs assessment.
- Identified students are served effectively with minimal removal from the regular classroom setting.
- Assessments are used to identify student needs and provide information to teachers, parents and students regarding achievement.
- Materials purchased with Title I funds address the needs of participating students.
- The implementation of and results achieved by the program are reviewed annually.
- Professional development for Title I-paid staff is designed to improve instruction for at-risk children.
- Title I-paid paraeducators are under the direct supervision of a certified teacher.
- Staff provide services to identified students only during the portion of time they are paid through Title I and the appropriate time and effort documentation is maintained.
- Services are coordinated with other federal, state and local programs.

Parent and family engagement (3)

- The parent and family engagement requirements for targeted assistance schools are the same as the requirements for schools operating schoolwide programs.
- The only difference is that in a schoolwide program, the requirements apply to parents of all students and in a targeted assistance program the requirements apply only to parents of participating students.

Final thoughts

- Read through the monitoring checklists carefully to ensure you understand what documentation should be saved.
- Develop standard procedures for how documentation will be saved in your district.
- Reach out to KDE for further clarification.
- Visit the [Title I, Part A Documents and Resources](#) webpage to access resources referenced throughout this training.
- Contact the state homeless education liaison listed on the [Education for Homeless Children and Youth](#) webpage for additional information on policies and procedures related to homeless students and their families.

Contact information

Erin Sudduth

Title I, Part A Support and Improvement Branch Manager

(502) 564-3791

erin.sudduth@education.ky.gov

[District Title I Consultants](#)