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|-------------------------------|------------------|-----------------------|-------------------------------|
| District:                     | Superintendent:  | Monitoring Dates:     | Private Schools:<br>Yes<br>No |
| Title IV, Part A Coordinator: | Finance Officer: | KDE Program Monitors: |                               |
|                               |                  |                       |                               |

The following checklist is used in the evaluation of a district’s Title IV, Part A program. The Kentucky Department of Education (KDE) is required to conduct compliance reviews to ensure that school districts use funds in accordance with the authorizing statute. The objectives of the reviews are:

- To assess the degree to which program requirements are being fulfilled and make recommendations when appropriate; and
- To provide technical assistance and guidance to strengthen program administration and quality.

The tool itself is organized into sections that directly align with the Title IV, Part A sections of the Every Student Succeeds Act. Each section contains monitoring questions that will be evaluated individually. The list found under Evidence (within each monitoring question) contains examples of documentation that may be submitted for review. Additionally, 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.

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

- Compliant means there is evidence that supports the approved application and compliance. The district provides sufficient evidence identified for meeting the compliance requirement and implementation of the approved Consolidated Application.
- Noncompliant means the district is unable to provide sufficient evidence identified for meeting the compliance requirement and implementation of the approved Consolidated Application.

On-site visits will include district staff, public and private schools receiving services under Title IV, Part A. Districts receiving federal funds must adhere to statute and federal grant requirements in the [Every Student Succeeds Act \(ESSA\)](#) and [Education Department General Administrative Regulations \(EDGAR\) and other applicable grant regulations](#).

| Compliance Rating   |   |
|---|---|
| Compliant   | Noncompliant  |
| LEA provides sufficient evidence identified for meeting the compliance requirement and implementation of the approved LEA's Consolidated Application. | LEA is unable to provide sufficient evidence identified for meeting the compliance requirement and implementation of the LEA's approved Consolidated Application. |

| Section 1: Program Development, Implementation, and Evaluation |  |  |                   |    |     |  |
|--|--|--|-------------------|----|-----|--|
| Compliance Requirement   |  | Example Documentation  | Compliance Rating |    |     | Comments   |
|  |  |  | C                 | NC | N/A | C=Compliant, NC = Non-Compliant, N/A = Not Applicable  |
| 1.1  | <p><b>STAKEHOLDER CONSULTATION</b></p> <p>All required stakeholders were consulted in the development and implementation of the district's Title IV, Part A plan and periodic meetings were scheduled. Required stakeholders include parents, teachers, principals, other school leaders, specialized instructional support personnel, students, community-based organizations, local government representatives and others with relevant and demonstrated expertise. (ESEA section 4106 (c)(1-2))</p> | <ul style="list-style-type: none"> <li>• Sign-in sheets</li> <li>• Stakeholder meeting minutes, agendas</li> <li>• Surveys/feedback (forms, emails, letters, etc.)</li> <li>• Meeting invitations</li> <li>• Letters/emails</li> <li>• Social media announcements</li> </ul> |                   |    |     |  |
| 1.2  | <p><b>NEEDS ASSESSMENT</b></p> <p>The LEA conducted a comprehensive needs assessment to examine the needs for improvement of access to, and opportunities for:</p> <ol style="list-style-type: none"> <li>a) A well-rounded education for all students;</li> <li>b) School conditions for student learning in order to create a healthy and safe school environment; and</li> </ol>  | <ul style="list-style-type: none"> <li>• CSIP/CDIP or other comprehensive needs assessment documents</li> <li>• Meeting dates, minutes and sign-in sheets</li> <li>• Documentation that contributed to the needs assessment (survey results,</li> </ul>                      |                   |    |     | (Required for districts that receive \$30,000 or more in Title IV, Part A funding. Must be conducted at least once every three years.) |

Section 1: Program Development, Implementation, and Evaluation

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|            | <p>c) Personalized learning experiences supported by technology and professional development for the effective use of data and technology.<br/>(ESEA section 4106(d))</p>  | <p>disciplinary records, course offerings, professional development schedules, etc.)</p>  |  |  |  |  |
| <p>1.3</p> | <p><b>ACTIVITY EVALUATION</b><br/>The LEA evaluates the effectiveness of the activities and programs throughout the year based upon the objectives and district's need based upon the comprehensive needs assessment. The district uses the periodic evaluation of data to determine effectiveness and future program planning.<br/>(ESEA section 4106(e)(1)(E))</p> | <ul style="list-style-type: none"> <li>• Sample evaluations/Activity Evaluation Form</li> <li>• District planning documentation</li> <li>• Data review; PLC minutes</li> <li>• Surveys</li> </ul> |  |  |  |  |

**Section 2: Fiscal Management**

| Compliance Requirement |  | Evidence (Suggested documentation)   | Compliance Rating |    |     | Comments/Submitted Documentation                      |
|------------------------|--|--|-------------------|----|-----|---|
|                        |  |  | C                 | NC | N/A |   |
|                        |  |  |                   |    |     | C=Compliant, NC = Non-Compliant, N/A = Not Applicable |
| 2.1                    | <p><b>ALLOCATIONS \$30,000 AND OVER</b></p> <p>Districts allocated and spent funds in all three sections of the grant with at least:</p> <ul style="list-style-type: none"> <li>• 20% for Well-Rounded Education</li> <li>• 20% for Safe and Healthy Students</li> <li>• A portion for Effective Use of Technology (ESEA section 4106(e)(2)(C-E))</li> </ul>   | <ul style="list-style-type: none"> <li>• MUNIS reports</li> </ul>  |                   |    |     | For districts receiving under \$30,000, write N/A.    |
| 2.2                    | <p><b>APPLICATION and BUDGET ALIGNMENT</b></p> <p>School(s) and district staffing patterns and financial expenditures/obligations to date are consistent with the approved Title IV, Part A GMAP application and budget. A separate accounting of Title IV, Part A funds is maintained in the MUNIS system and matches the categories set up in GMAP. (ESEA section 8306; 2 CFR 200.302)</p>   | <ul style="list-style-type: none"> <li>• Detailed MUNIS reports</li> <li>• Title IV, Part A approved GMAP budget</li> </ul>  |                   |    |     |   |
| 2.3                    | <p><b>TIME AND EFFORT REQUIREMENTS</b></p> <p>The district has written procedures in place for time and effort. These written procedures should include instructions for:</p> <ul style="list-style-type: none"> <li>• The completion of time and attendance reporting;</li> <li>• The approval cycle that is required;</li> <li>• The processing of personnel charges to federal awards;</li> <li>• The internal review process that will be established to ensure effective internal control over the federal award (2 CFR 200.430(i)); and</li> <li>• The necessary adjustment required so that the final amount charged to the federal award for the salary is accurate, allowable and properly</li> </ul> | <ul style="list-style-type: none"> <li>• Written time and effort procedures for how the district will ensure that personnel charges to federal awards are accurate, allowable and properly allocated, including a process for after-the-fact review of interim charges made to the federal award based on budget estimates.</li> </ul> |                   |    |     |   |

Section 2: Fiscal Management

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|     | <p>allocated (2 CFR 200.430 (i)(8)). This justification must occur at least annually.</p> <p>The district maintains documentation for any employees paid in full or in part with Title IV, Part A funds to support the allocability, veracity and accuracy of the work performed.</p> <p>(2 CFR 200.430 (i); 2 CFR 200.430; 2 CFR 200.431)</p> | <ul style="list-style-type: none"> <li>• Documentation to support the allocability, veracity and accuracy of the work performed for all employees paid in whole or in part with Title IV, Part A funds. Signed, dated semi-annual certification and/or monthly PAR reports, or another prior KDE-approved documentation system, should be provided.</li> </ul> <p>(Payroll charges must match the actual distribution of time recorded.)</p> |  |  |  |  |
| 2.4 | <p><b>EQUIPMENT AND SUPPLIES</b></p> <p>Assets and equipment purchased with Title IV, Part A funds are appropriately tagged and clearly marked. The district has a system in place for marking items purchased with federal funds and disposal of items.</p> <p>(2 CFR 200.313; 2 CFR 200.314)</p>   | <ul style="list-style-type: none"> <li>• Inventory records</li> <li>• Reason for disposal and removal from master inventory</li> <li>• Copy of district protocols</li> <li>• Photos or samples of items tagged and labeled</li> </ul>  |  |  |  |  |
| 2.5 | <p><b>Internal Controls</b></p> <p>The district maintains adequate internal controls in the disbursement of Title IV, Part A funds.</p> <p>(ESEA section 8306; 2 CFR 200.303)</p>  | <ul style="list-style-type: none"> <li>• Procurement policies and procedures</li> <li>• Signed invoices</li> </ul>   |  |  |  |  |
| 2.6 | <p><b>Supplement/Not Supplant</b></p>  | <ul style="list-style-type: none"> <li>• Expenditure reports</li> </ul>  |  |  |  |  |

Section 2: Fiscal Management

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|            | <p>The district documents that Title IV, Part A funds supplement, not supplant, general funds or programs/activities required by state or local law.<br/>(ESEA section 4110 and 8306)</p> | <ul style="list-style-type: none"> <li>• Signed assurances</li> <li>• MUNIS report</li> <li>• Board meeting minutes</li> <li>• School council general funds staffing allocations</li> </ul> |  |  |  |  |
| <p>2.7</p> | <p><b>RETENTION REQUIREMENTS FOR RECORDS</b><br/>All Title IV, Part A records are kept for the current year and three previous years.<br/>(2 CFR 200.334)</p>                             | <ul style="list-style-type: none"> <li>• Board policy</li> <li>• Title IV, Part A records (upon request)</li> </ul>   |  |  |  |  |

Private School Name: \_\_\_\_\_

Private School Title IV, Part A Coordinator: \_\_\_\_\_

| Section 3: Equitable Services to Private Schools |   |  |                   |    |     |  |
|--|---|--|-------------------|----|-----|--|
| Compliance Requirement                           |   | Evidence – Suggested Documentation   | Compliance Rating |    |     | Comments/Action Required                             |
|  |   |  | C                 | NC | N/A | C=Compliant, NC = Non-Compliant, N/A= Not Applicable |
| 3.1  | <p><b>PRIVATE/NON-PUBLIC SCHOOLS SERVED</b><br/>           Are there private/non-public schools being served by Title IV, Part A?<br/>           (Complete the following if non-public schools exist in the district <u>and</u> have elected to participate).<br/>           (ESEA section 8501; 34 CFR 76.651)</p> | <ul style="list-style-type: none"> <li>List of participating non-public schools</li> <li>List of all private schools in the district</li> <li>Letters to private or home schools; evidence of receipt (postal return receipt)</li> <li>Declaration of participation</li> </ul> |                   |    |     |  |
| 3.2  | <p><b>NON-PUBLIC SCHOOL CONSULTATION</b><br/>           In consultation with the private/home school, the district completed the required Equitable Service Consultation packet.<br/>           (ESEA section 8501)</p>   | <ul style="list-style-type: none"> <li>Signed consultation form</li> </ul>   |                   |    |     |  |
| 3.3  | <p><b>ONGOING COMMUNICATION</b><br/>           The district has two-way, ongoing communication with private schools served by Title IV, Part A in order to determine needs of those schools and whether those needs are being met.<br/>           (ESEA section 8501; 2 CFR 76.652)</p>                             | <ul style="list-style-type: none"> <li>Records of consultation meetings (meeting minutes, sign-in sheet, agenda)</li> <li>Evidence of regular consultation with private school officials (emails, phone call notes, meeting minutes, etc.)</li> </ul>                          |                   |    |     |  |

Section 3: Equitable Services to Private Schools

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| 3.4 | <p><b>PROGRAM IMPLEMENTATION</b><br/>The district implements and oversees private school services. District verifies services provided are allowable and non-ideological.<br/>(ESEA section 8501(a)(2))</p>   | <ul style="list-style-type: none"> <li>• Consultation agenda</li> <li>• Surveys; consultation form; needs assessments; invoices; evaluation</li> <li>• Invoices for services</li> </ul> |  |  |  |  |
| 3.5 | <p><b>FISCAL OVERSIGHT</b><br/>Expenditures have been made for the non-public school on an equitable basis and in accordance with the consultation packet and approved GMAP application. The district maintains fiscal control over all services provided.<br/>(ESEA section 8501; 34 CFR 76.651)</p>   | <ul style="list-style-type: none"> <li>• Invoices</li> <li>• Detailed MUNIS</li> <li>• Title IV, Part A GMAP budget</li> <li>• Consultation packet</li> </ul>                           |  |  |  |  |
| 3.6 | <p><b>EQUIPMENT AND SUPPLIES</b><br/>The district maintains documentation of items purchased on behalf of the private schools. Procedures have been established for the retrieval of Title IV, Part A purchases made on behalf of private schools when the materials are no longer needed for program purposes. The procedures require that retrieved purchases be distributed equitably among participating private schools.<br/>(ESEA section 8501(d); 34 CFR 76.661)</p> | <ul style="list-style-type: none"> <li>• Disposal of equipment procedures</li> <li>• Inventory logs</li> <li>• Photos of labeled items purchased</li> </ul>                             |  |  |  |  |
| 3.7 | <p><b>PRIVATE SCHOOL PROGRAM EVALUATION</b><br/>The district evaluates the effectiveness of strategies and activities funded under Title IV, Part A and uses this data to determine future program planning.<br/>(ESEA section 4106(e)(1)(E))</p>   | <ul style="list-style-type: none"> <li>• Private school needs assessment</li> <li>• Evaluation forms</li> <li>• Evidence of program evaluation (surveys, data, etc.)</li> </ul>         |  |  |  |  |
| 3.8 | <p><b>COMPLAINT PROCEDURE</b><br/>Non-public school and home school officials have been notified of the</p>   | <ul style="list-style-type: none"> <li>• Consultation packet</li> <li>• Interview</li> </ul>  |  |  |  |  |



Section 3: Equitable Services to Private Schools

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|  | district's complaint procedure, in the event there is a question of equitability of services.<br>(ESEA section 8501) | <ul style="list-style-type: none"><li>• Copy of complaint procedure</li></ul> |  |  |  |  |
|--|--|---|--|--|--|--|