Texas Private School Equitable Services Monitoring System

National
Elementary and Secondary Education Act (ESEA) Conference
Kansas City, Missouri

January 31, 2019

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Agenda

- Overview of Texas Private Nonprofit (PNP) Data
- System of Support and Program Monitoring
- Federal Fiscal Monitoring

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Overview of Texas PNP Data

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Overview of Texas Data (FY18 data as of October 2018)

Total Local Educational Agencies (LEAs)	1,208
Total Independent School Districts (ISDs)	1,022
Total Educational Service Centers (ESCs)	20
Total LEAs with PNP schools participating in one or more Title programs	315
Total PNP schools served with Title I, Part A funds	1,824

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Overview of Texas PNP Data (continued)

	Title I, Part A	Title I, Part C	Title II, Part A*	Title III, Part A-EL	Title III, Part A-IMM	Title IV, Part A
#PNP Schools Served	487	1	557	100	13	369
PNP Students Served *(Staff served)	7,868	1	21,625*	2,798	126	73,370

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System of Support and Program Monitoring

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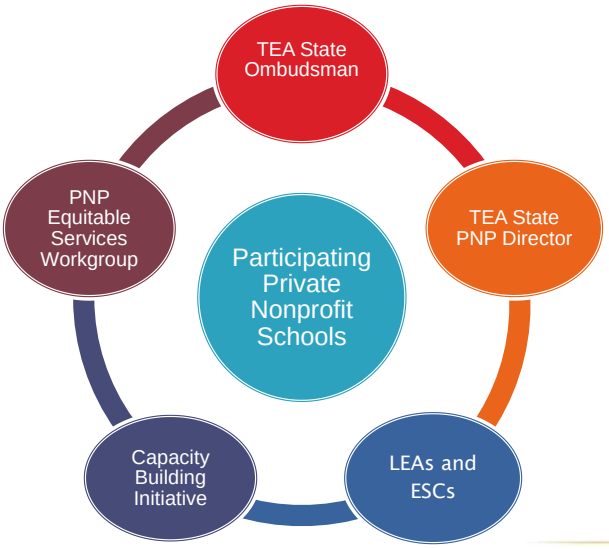
TEA's PNP Integrated System of Support



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ESSA Program Support

- **Statewide training sessions**
  - LEAs
  - Education Service Centers
  - Texas Private School Accreditation Commission & Texas Private School Associations
  - PNP School Officials
  - PNP Workgroup
- **Title I Capacity Building Initiative Collaboration**

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Program Monitoring

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Program Monitoring

- LEA Self-Assessment of PNP Equitable Services
- Collaboration with other TEA divisions and program offices
- Collaboration with other stakeholders (LEAs, ESCs, PNPs, Title I Committee of Practitioners, PNP Workgroup)
- Random Program Validations (desktop monitoring)
- Compliance Reports (annually)

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LEA Self-Assessment of PNP Equitable Services

- Describe LEA's consultation process
- How are the needs identified
- Describe the services to be provided
- How will decisions about services be made
- How will progress be monitored for effectiveness
- How will LEA ensure oversight (allowability, compliance, equipment, etc.)

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Random Program Validations

Texas Education Agency
LEA Equitable Services for Eligible Private Nonprofits (PNP) Schools
*Random Validation Guidance Document
2018 -2019

Services to Eligible Private School Children. The LEA ensures that it complies with the requirements of providing equitable services to eligible private school children, their teachers and their families. **ESEA as amended by ESSA, Section 1117 (Title I, Part A) and Section 8501 (Titles I, Part C; Title II, Part A; Title III, Part A - EL and Immigrant; Title IV, Parts A, B, and F).**

*Random Validation Guidance document for 2018-2019 only includes *selected* PNP ESSA requirements. The LEA must ensure it has all PNP requirements of Sections 1117 and 8501 on file in the district.

Column A Selected LEA ESSA PNP Requirements	Column B Acceptable *Sample* LEA Documentation	Column C LEA Written Response and/or Documentation Required *IF* TEA Follow-Up is Requested (Corrective Action Phase)
Initial Consultation to Private Schools **Sec. 1117(b)(1)** **Sec. 8501(c)(1)** **1.** Has the LEA established initial and ongoing consultation meetings with private school officials on program requirements?	• Documentation that consultation has occurred between LEA and private school officials or their representatives regarding services for private school children prior to the LEA making any decision: o Copy of an intent to participate from officials of the private school or a representative o Agendas, sign-in sheets, emails, phone logs, etc. ***AND*** • Documentation that consultation has been **ongoing** since the initial contact (i.e., agenda, sign-in sheets, emails, phone logs, meeting agendas, etc.)	• Describe the initial LEA process for providing information to private school officials of program requirements (i.e., certified letter to PNP, emails, public postings, scheduled meetings, etc.) • Describe the **ongoing** process for consulting with private school officials throughout the year (i.e., meeting agendas, meeting notes, emails, etc.) • After evaluating the LEA's past year's consultation process, describe what improvements will be made for the next year

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Common Program Findings

- Lack of written documentation
- Lack of LEA program oversight
- Lack of LEA review process for PNP requests
- Lack of adequate description of equitable services available

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Common Program Strengths

- Documentation of ongoing consultation meetings
- Equitable services handbook and written program descriptions
- Evaluation of program effectiveness
- Review of data and PNP needs
- Collaboration and coordination of services

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Program Compliance Report

Desktop monitoring of all LEAs serving PNP schools

- Year-end reporting
- Program implementation reviews
  - Timely and meaningful consultation
  - Maintaining local control
  - Equitable services for services and administration

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Program Compliance Report

Table of Contents | PR3099 – Private Nonprofit (PNP) School Equitable Services Compliance Report | Instructions

Part 1: Total Schools within Boundary

1.	Indicate number of Private Nonprofit (PNP) schools within boundaries.	
2.	If LEA received Title I, Part A funds, indicate number of eligible PNP schools attended out of boundaries.	

Part 2: Program Participation

Did PNP schools participate?

	Title I, Part A	Title I, Part C	Title II, Part A	Title III, Part A ELA	Title III, Part A Immigrant	Title IV, Part A
1.	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No	○ Yes ○ No

Number of participating PNP schools that received equitable services

	Title I, Part A	Title I, Part C	Title II, Part A	Title III, Part A ELA	Title III, Part A Immigrant	Title IV, Part A
2.						

Number of eligible PNP students that received equitable services

	Title I, Part A	Title I, Part C	Title II, Part A (# of staff)	Title III, Part A ELA	Title III, Part A Immigrant	Title IV, Part A
3.						

Part 3: Program Implementation

Requirement

1. Did the LEA conduct timely and meaningful consultation with participating PNP school officials regarding the implementation of the program(s)?

   Note: The consultation must have occurred before the LEA made any decision that affected the opportunities of eligible PNP school children, teachers, and other educational personnel to participate in the program, and continued throughout the implementation and assessment of program activities.
   [ESSA Section 1117(b)(1) and Section 8501(c)(1)]

   For each program with participation, if **Yes** is selected, the LEA must list the source(s) of documentation it has readily available to submit to the agency to document compliance with the requirement. If **No** is selected, the LEA must explain the reason for noncompliance, or if **NA** is selected, the LEA must explain why the requirement is not applicable.

a.	**Title I, Part A**	○ Yes ○ No ○ N/A
	Explanation of Compliance Status:	1000 of 1000

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Federal Fiscal Monitoring

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Private Nonprofit (PNP) School Equitable Services

Who is ultimately responsible for expenditures of PNP funds?

- LEA?
- Private Nonprofit?

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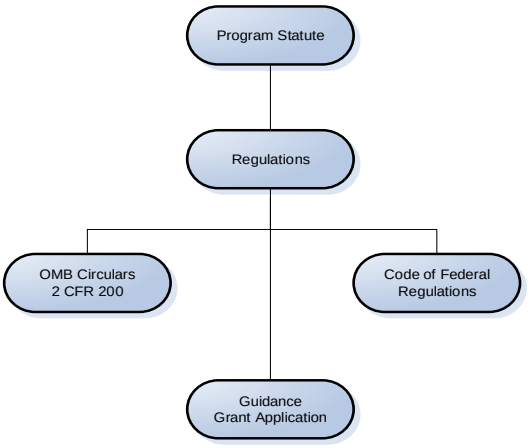
PNP School Equitable Services

Legal Structure



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Fiscal Monitoring of PNP Funds

Monitoring PNP funds consist of:

- Review of Financial Management System
- Review of Internal Controls
- Financial reporting of PNP funds
- Verification of data reported on the grant application
- Testing of selected expenditures
- Address questions, concerns, observations, etc., during the review

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Fiscal Monitoring of PNP Funds

Financial Management System:

- Accounting software
- Internal Controls
- Budgetary Controls
- Financial Reporting
- Record-keeping (source documentation)
- Compliance with applicable state, federal and grant specific requirements

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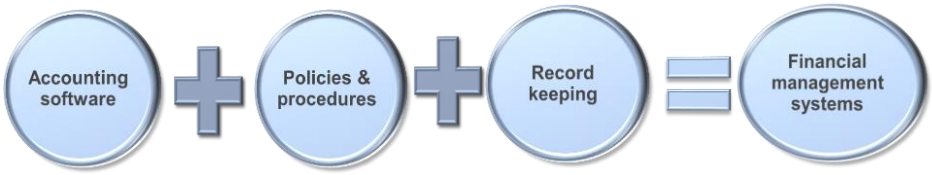
Financial Management System



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Financial Management System

Accounting Software
- Able to generate necessary financial records

Internal Controls
- Written policies and procedures required by the *Education Department General Administrative Regulations* (EDGAR)

Examples:
- Procurement Methods
- Allowability of Cost
- Travel Authorization and Reimbursement
- Conflict of Interest

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Financial Management System

Budgetary Controls
- Budgets are set up and PNP funds are tracked in the financial management system

Financial Reporting
- Expenditures of PNP funds are identified separately in the financial records

Source Documentation
- Supporting documentation is maintained for PNP funds

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Grant Application : PNP Schedule Part 1

- Participation of PNPs
- Private school participation by program
- Assurances

Part 1: Private Schools Consultation and Participation — Help

A. Private Schools Consultation		
1.	Are any private nonprofit schools located within the LEA's boundaries?	O Yes O No
2.	Does the LEA have any Title I, Part A eligible students attending private nonprofit schools outside the boundaries?	O Yes O No

B. Are any private nonprofit schools participating?					
Title I, Part A	Title I, Part C Migrant	Title II, Part A	Title III, Part A ELA	Title III, Part A Immigrant	Title IV, Part A-SSAEP
O Yes O No	O Yes O No	O Yes O No	O Yes O No	O Yes O No	O Yes O No

C. Assurances		
1.	☐	The LEA assures that it discussed all consultation requirements as listed in Section. 1117(b)(1) and/or Section. 8501(c)(1), as applicable, with all eligible private nonprofit schools located within the LEA's boundaries.
2.	☐	The LEA assures the appropriate Affirmations of Consultation will be provided to the TEA Private Schools Ombudsman in the manner and timeline requested.

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Grant Application : PNP Schedule Part 2

Part 2: Equitable Services Calculations

A. Equitable Services Calculation for Title I, Part A — Help

	Description	Calculation
1.	Total low-income enrollment in LEA from participating Title I attendance areas	
2.	Total eligible low-income students attending private schools who reside in a participating (or skipped) Title I attendance area based on one of the following methods (select the method used):	
a)	O using the same measure of low income used to count public school children;	
b)	O using the results of a survey that, to the extent possible, protects the identity of families of private school students, and allowing such survey results to be extrapolated if complete actual data are unavailable;	
c)	O applying the low-income percentage of each participating public school attendance area, determined pursuant to this section, to the number of private school children who reside in that school attendance area; or	
d)	O using an equated measure of low income correlated with the measure of low income used to count public school children.	
3.	Calculated total number of low-income students in the LEA (A.1 + A.2)	
4.	Total current year Title I, Part A allocation	
5.	Transfer in from Title II, Part A	
6.	Transfer in from Title IV, Part A	
7.	Total allocation and transfer amount(s) (A.4 + A.5 + A.6)	
8.	LEA per pupil allocation (A.7 / A.3)	
9.	Calculated <grant year in XXXX-XXXX> Private School Reservation (A.2 X A.8)	
10.	Administration of Title I, Part A program for eligible private nonprofit students. For independent projects this amount will equal to the administration reservation reported on PS3101, Part 1, B. Activities to be Conducted with Reserved Funds, Line 3.	
11.	**Total Calculated Private School Reservation** (A.9 – A.10) For independent projects this amount will equal the private school reservation reported on PS3101, Part 1, B. Activities to be Conducted with Reserved Funds, Line 2	
12.	**Minimum Proportionate share of equitable services for parents and families** (A.7 X 1%) X (A.2 / A.3) (Optional if the total of current year allocation and transfer amount(s) is less than $500,000)	
13	**Maximum Proportionate share of equitable services** (A.11 – A.12)	

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Verification of Data Reported

- Review supporting documentation to verify low income students reported on the schedule
- Review financial records to verify the amount of PNP funds appropriated for each program in the general ledger
- Review PNP affirmation sheets submitted by LEAs for participating PNPs for each program

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Testing of PNP Expenditures

- Select a sample of PNP expenditures and request supporting documentation
- Examine supporting documentation to ensure expenditures complied with state and federal laws, rules, regulation and grant application requirements
- Review PNP affirmation sheets submitted by LEAs for participating PNPs

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Testing of PNP Expenditures

- Issue preliminary report of findings and observations to grantee with recommendations for corrective actions
- Examine grantee's response and make necessary adjustments in the report
- Issue final report of findings and observations with follow-up corrective actions not completed

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Common Fiscal Findings

- Direct Payments to PNPs
- Lack of planning of PNP expenditures
- Lack of oversight of PNP expenditures
- Payments of PNP expenditures without prior approval

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Common Fiscal Findings (continued)

- PNP funds paid for ineligible training/travel costs
- PNP expenditures did not adhere to applicable state and federal laws
- Lack of proper agreements with third-party service providers
- Lack of proper agreements for shared services/consortium

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Questions?

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Webpages

TEA Private School Services
https://tea.texas.gov/Finance_and_Grants/Grants/ESSA_Private_School_Equitable_Services

TEA Federal Fiscal Monitoring
https://tea.texas.gov/Finance_and_Grants/Grants/Federal_Fiscal_Monitoring/Federal_Fiscal_Monitoring_Division

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