

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

**District:**

**Superintendent:**

**Finance Officer:**

**Title I, Part A Coordinator:**

**Date(s) of Monitoring Visit:**

**KDE Monitoring Staff:**

The following checklist is used in the evaluation of a district's Title I, Part A activities during a consolidated monitoring visit. Program compliance and/or effectiveness is determined based on interview responses and 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). Each section contains several monitoring questions that will be evaluated individually.

Documentation must be provided at least two weeks prior to the visit for Kentucky Department of Education (KDE) review. Required and suggested documentation to be provided is listed with each indicator. 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 upload documentation to SharePoint.

**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 providing evidence for KDE review. If PII is provided, KDE will request the file(s) be removed immediately and replaced with 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. District Title I Plan and Eligible Public Schools

Districts selected for monitoring should provide one to two pieces of relevant documentation for each indicator. Please note, KDE consultants can access the Needs Assessment, Comprehensive District Improvement Plan (CDIP) and other comprehensive improvement planning diagnostics in the Cognia Continuous Improvement Platform. It is not necessary to upload those documents to SharePoint.

<b>District Title I Plan and Eligible Public Schools District Monitoring Indicators</b>
<p>1. District-level procedures ensure that funds are allocated appropriately and effectively to serve at-risk students. [See ESSA 1112(b).]</p> <p><b>Suggested Documentation:</b> Meeting agendas and detailed minutes or other strong documentation that details the allocation and plan for the use of Title I funds.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>2. The district implements strategies to facilitate effective transitions for students from middle grades to high school and from high school to postsecondary including, if applicable—</p> <p>(A) through coordination with institutions of higher education, employers and other local partners;</p> <p>(B) through increased student access to early college high school or dual or concurrent enrollment opportunities, or career counseling to identify student interests and skills; [See ESSA 1112(b)(10).]</p> <p><b>Suggested Documentation:</b> Listing of and descriptions of transition activities for applicable grade levels, email communication regarding transition activities.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>3. The district reduces the overuse of discipline practices that remove students from the classroom. [See ESSA 1112(b)(11).]</p> <p><b>Suggested Documentation:</b> Data and/or meeting agendas or other strong documentation in which discipline trends are discussed. Evidence the district is working to address identified discipline disparities as applicable.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>4. The district identifies and addresses any disparities that result in low-income and minority students being taught at higher rates than other students by ineffective, inexperienced or out-of-field teachers. [See ESSA 1112(b)(2).]</p> <p><b>Suggested Documentation:</b> Scheduling policies and procedures and examples of support systems for teachers that ensure low-income and minority students are not being taught at higher rates than other students by ineffective, inexperienced or out-of-field teachers. Evidence the district is providing training and support to ineffective, inexperienced or out-of-field teachers as needed such as professional learning opportunities, mentor teachers, etc.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>5. The CDIP is developed with timely and meaningful consultation with teachers, principals, other school leaders, paraprofessionals, specialized instructional support personnel, administrators, other appropriate school personnel and with parents of children in schools served. [See ESSA 1112(a)(1)(A).]</p>

**District Title I Plan and Eligible Public Schools District Monitoring Indicators**

**Suggested Documentation:** Meeting agendas and detailed minutes or other strong documentation (e.g., comments and feedback from stakeholders) showing stakeholder consultation in the development of the CDIP.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

6. Enrollment and low-income counts used for rank and serve purposes are accurate, matching the numbers on the Grant Management Application and Planning system (GMAP) application. There is documentation to support the use of the feeder pattern, if applicable. Enrollment and low-income data for all schools was taken on the same day. [See ESSA 1113.]

**Required Documentation:** Free/Reduced Application Management (FRAM) Reports from Infinite Campus for all schools (also known as Eligibility Reports). The reports must match the date reported on the GMAP School Program Description page and the low-income data (free- and reduced-price lunch or direct certification) and enrollment data for all A1 schools and any non-A1 schools receiving Title I services reported on the GMAP School Eligibility page.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

7. School allocations are being followed as reported on the current GMAP application (including 125% and High School 50% ranking exception rules if applicable) versus what is reported in Enterprise ERP (EERP, formerly MUNIS). [See ESSA 1113(a).]

**Required Documentation:** Detailed month to date EERP budget report with purchase order-level details for the current fiscal year showing all project (310L, 310LM, and when applicable, 310LP and 310LN) budgeting and expenditures to-date. The total amounts budgeted at the district and school levels should align with the GMAP District Set-Aside and Per Pupil Amount pages.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

8. If a school is being served as a schoolwide program under 40% poverty, there is an official state waiver on file at KDE. [See ESSA 1114(a)(1)(B).]

**Required Documentation:** As applicable, KDE staff will verify the district received an email granting the waiver to operate a schoolwide program in a school under 40% poverty.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

**II. Institutions for Neglected Children**

Districts operating institutions for neglected children selected for monitoring should provide one to two pieces of relevant documentation for each indicator.

**Institutions for Neglected Children District Monitoring Indicators**

1. Documentation supports the child count for local institutions for neglected children that was submitted to KDE. [See ESSA 1124(c)(1)(B).]

**Required Documentation:** Child counts for each neglected facility served supporting the counts submitted to KDE.

**Institutions for Neglected Children District Monitoring Indicators**

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

- 2. Each institution was effectively consulted about services. Services are based on student needs and sufficient funds are allocated for those services. Services are comparable to those received at public schools. [See ESSA 1112(a)(1).]

**Suggested Documentation:** Needs assessment for the neglected facility, consultation agendas, notes, or other strong program planning documentation in which needs were discussed with facility representatives.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

**III. Foster Children and Youth**

Districts selected for monitoring should provide one to two pieces of relevant documentation for each indicator. It will be necessary to schedule an interview with the district's foster care point-of-contact.

**Foster Children and Youth District Monitoring Indicators**

- 1. The district has appointed an individual to serve as the foster care point-of-contact (POC). [See ESSA 1112(c)(5)(A).]

**Required Documentation:** Accurate foster care POC listed on the district's [Open House](#) webpage.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

- 2. The district has adopted policies and implemented practices for the enrollment of foster children. The policies and practices ensure the following:
  - a. Any child in foster care remains in the child's school of origin, unless a determination is made that it is not in such child's best interest. Such decisions shall be based on all factors relating to the child's best interest, including consideration of the appropriateness of the current educational setting and the proximity to the school in which the child is enrolled at the time of placement. [See ESSA 1111(g)(1)(E)(i).]
  - b. If it is not in the child's best interest to remain in the school of origin, the child will be immediately enrolled in a new school even if the child is unable to produce records normally required for enrollment. [See ESSA 1111(g)(1)(E)(ii).]
  - c. The enrolling school shall immediately contact the school last attended by any such child to obtain relevant academic and other records. [See ESSA 1111(g)(1)(E)(iii).]

**Required Documentation:** Up-to-date policies for enrolling foster children as well as observation during the interview that the foster care POC is familiar with the policies and they are being implemented with fidelity.

**Suggested Additional Documentation:** Written procedures outlining the best interest determination practices and how the district ensures the immediate enrollment for foster children, evidence (email correspondence, phone logs, etc.) that the last school attended is being contacted, with PII redacted.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

### Foster Children and Youth District Monitoring Indicators

3. The district collaborates with the child welfare agency 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)(B).]

These procedures shall:

- 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
- Ensure that, if there are additional costs incurred in providing transportation to maintain children in foster care in their schools of origin, the local educational agency will provide transportation to the school of origin if:
  - The local child welfare agency agrees to reimburse the local educational agency for the cost of such transportation;
  - The local educational agency agrees to pay for the cost of the transportation; or
  - The local educational agency and the local child welfare agency 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:**

#### IV. Homeless Children and Youth

Districts selected for monitoring should provide one to two pieces of relevant documentation for each indicator. It will be necessary to schedule an interview with the homeless liaison. Please note that requirements of the McKinney-Vento Homeless Education Assistance Improvements Act are required of all districts, whether or not the district receives the McKinney-Vento grant.

### Homeless Children and Youth District Monitoring Indicators

1. 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:**

### Homeless Children and Youth District Monitoring Indicators

2. The district has effectively communicated to students, families, school and district staff, shelter workers and other community service providers that there is a designated local homeless liaison within the district (whether or not it receives a McKinney-Vento grant) to serve as a primary contact for identifying homeless families and for obtaining/providing services to those families. [See McKinney-Vento 11432(g)(6)(v).]

**Suggested Documentation:** Examples of public communications with homeless students and families notifying them of the liaison's contact information and eligibility for services, including the dispute resolution; examples of training documents and sign in sheets or other strong documentation that supports that training is provided to district staff.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

3. The district has adopted policies and implemented procedures related to the identification and enrollment of homeless students. The policies and procedures must describe how the district will:

- a. Effectively identify homeless children and youth through coordinated activities with staff within the district and with other entities and agencies. [See McKinney-Vento 11432(g)(6)(A)(i).]
- b. Effectively identify and eliminate enrollment and attendance barriers so homeless students are automatically enrolled in school and have full and equal opportunity to succeed in the educational setting. [See McKinney-Vento 11432(g)(6)(A)(ii).]

**Suggested Documentation: (1)** Policies and written procedures or other strong documentation addressing the identification, enrollment, enrollment in the school of origin decision making and reduction of barriers for students experiencing homelessness. **(2)** Examples of training documents and sign in sheets or other strong documentation that supports that training is provided to district staff.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

4. Consistent with KRS 156.160(1)(p), and to the extent feasible, homeless children and unaccompanied youth are awarded credit, including partial credit, for all coursework satisfactorily completed. [See [704 KAR 7:090\(2\)\(4\)](#).]

**Required Documentation:** Up-to-date policy for awarding credit to homeless students.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

5. The district has adopted written procedures to ensure credit, including partial credit, is awarded for all coursework satisfactorily completed by homeless children and unaccompanied youth which address the following:

- The tool or methodology the district shall use to calculate credit, including partial credit, to be awarded for all coursework satisfactorily completed by homeless children and unaccompanied youth;
- The consolidation of partial credit, where appropriate, to provide opportunities for credit accrual that eliminate academic and non-academic barriers for homeless children and unaccompanied youth;
- How the district shall provide students experiencing homelessness access to extracurricular and

## Homeless Children and Youth District Monitoring Indicators

summer programs, credit transfer and electronic course services, and after-school tutoring and other extended school services available in the district to the fullest extent practicable and at nominal or no costs;

- The ways in which the local education agency (LEA) shall lessen the impact of school transfers for homeless children and unaccompanied youth, which shall include:
  - Identifying systems that are in place to ease the transition of students experiencing homelessness, particularly during the first two weeks at a new school;
  - Requiring counselors to provide timely assistance and advice to improve college and career readiness for students experiencing homelessness; and
  - Granting priority placement in classes offered by the district that meet state minimum graduation requirements for students who change schools at least once during a school year because of homelessness;
- How and in what circumstances the district shall allow a student experiencing homelessness who was previously enrolled in a course required for high school graduation to complete that course at no cost before the beginning of the next school year as required by KRS 156.160(1)(p)(2); and
- The required review of credit accrual and the personal graduation plan for each homeless student and unaccompanied youth that is not on track to receive a high school diploma before the fifth year of high school enrollment.

*Please note, the written procedures must outline how the district will award credit to homeless students. A policy statement that the district will award credit without explaining how is not sufficient. Refer to KDE's [Awarding Credit and Partial Credit to Homeless Children and Youth Checklist](#) and other resources regarding awarding credit and credit accrual on the [Education for Homeless Children and Youth webpage](#). [See [704 KAR 7:090\(2\)\(5\)](#).]*

**Required Documentation: (1)** Written procedures detailing how the district will ensure credit, including partial credit, is awarded to homeless students. **(2)** Evidence the procedures have been shared with appropriate staff such as counselors.

**Suggested Additional Documentation:** Evidence the procedures are being implemented, with PII redacted.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

### Notes:

6. The district has adopted written procedures for awarding a high school diploma to homeless children and unaccompanied youth who transfer after completion of the second year of high school and meet the requirements outlined in [KRS 156.160\(1\)\(p\)](#). [See [704 KAR 7:090\(2\)\(7\)](#).]

*Please note, the procedures for awarding a high school diploma may be combined with the procedures for awarding credit referenced in this section.*

**Required Documentation: (1)** Written procedures detailing how the district will ensure diplomas are awarded to homeless students (this may be combined with the procedures regarding awarding credit). **(2)** Evidence the procedures have been shared with appropriate staff such as counselors.

**Suggested Additional Documentation:** Evidence the procedures are being implemented, with PII redacted.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

## Homeless Children and Youth District Monitoring Indicators

### Notes:

7. The district ensures school personnel providing McKinney-Vento/homeless services receive professional development and other support related to addressing the challenges of homelessness and supporting homeless children and unaccompanied youth, including runaway youth. [See [704 KAR 7:090\(2\)\(3\)\(g\)](#) and McKinney-Vento 11432(g)(6)(A)(ix).]

**Suggested Documentation:** Evidence that staff have been trained in supporting students experiencing homelessness such as training materials, agendas, sign-in sheets, etc.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

### Notes:

8. Homeless Education posters are in place at each school and at the district office (both English and Spanish versions, if applicable) in locations where parents can easily see them. [See McKinney-Vento 11432(g)(6)(A)(vi).]

*Districts may order up to 10 new posters each school year at no charge from the [National Center for Homeless Education](#).*

**Required Documentation:** Observations by KDE monitoring staff that the homeless posters are on display throughout the district in locations where parents can easily see them and that the correct district and state contact information is listed on the poster.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

### Notes:

9. Homeless children and their families receive education services for which they are entitled and for which the district currently provides, such as Head Start and preschool programming, referrals to clinics (regarding physical, mental and/or dental health) and/or other appropriate services. [See McKinney-Vento 11432(g)(6)(A)(iii-iv).]

**Suggested Documentation:** Examples of services provided to homeless students and families with PII redacted. Examples of services may also be discussed during the on-site interview to protect PII.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

### Notes:

10. Homeless families and unaccompanied youth are effectively informed of and assisted in obtaining available transportation services (i.e., to and from the school of origin to ease the burden of attending school or obtaining services). Note: Transportation to and from the school of origin may not be provided if it has been determined not to be in the child's best interest. [See McKinney-Vento 11432(g)(6)(A)(viii).]

**Suggested Documentation:** Observations by KDE monitoring staff of the homeless poster outlining available transportation services on display and examples of transportation services provided to homeless students (with PII redacted) during the current school year as applicable. Examples of transportation services may also be discussed during the on-site interview to protect PII.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

### Notes:

11. Families and youth are made aware of the right to challenge placement and enrollment decisions. If a dispute



Homeless Children and Youth District Monitoring Indicators
<p>arises over school selection or enrollment, the homeless student is immediately enrolled in the school of choice pending resolution of the dispute. [See McKinney-Vento 11432(g)(6)(A)(vii).]</p> <p><b>Suggested Documentation:</b> Observations by KDE monitoring staff of the homeless poster outlining rights on display, examples of disputes that have been resolved pertaining to enrollment and transportation during the current school year as applicable (with PII redacted).</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>12. Title I funds reserved for homeless students are spent timely to meet identified needs of eligible students. [See ESSA Sections 1113, 1118 and 8306 and Parts 76 and 200 of EDGAR.]</p> <p><i>Please note, homeless set-aside funds are meant to be spent during the fiscal year in which they are appropriated. At the time of the monitoring visit, all homeless set-aside funds from the previous year and approximately half of the homeless set-aside funds from the current year should be obligated to demonstrate timely spending.</i></p> <p><b>Required Documentation:</b> Detailed month-to-date EERP budget report for the current (310L) and previous (310K) fiscal year showing the amount budgeted for homeless expenditures aligns with the amount listed on the FY2025 and FY2024 GMAP District Set-Aside page, invoices, purchase orders, needs assessment for homeless students. <i>KDE may request to see specific purchase orders and/or invoices based on the EERP review.</i></p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>

**V. English Learners**

Districts selected for monitoring should upload one to two pieces of relevant documentation for each indicator. Please note, it will be necessary to schedule an interview with the Title III/English Learner coordinator.

English Learners District Monitoring Indicators
<p>1. The district has procedures in place to ensure there is an effective means of outreach to the parents of all English learners (ELs). Outreach must include holding and promoting attendance at opportunities for regular meetings to inform parents about how they can be involved in their children's education, assist their children to attain English proficiency, achieve at high levels and meet state academic standards. [See ESSA 1112(e)(3)(C).]</p> <p><i>Please note, EL parent outreach is in addition to parent and family engagement and support opportunities provided to all parents.</i></p> <p><b>Suggested Documentation:</b> Examples of public outreach to all EL families, invitations, agendas and sign in sheets, needs assessments, surveys or other strong documentation for parent and family engagement activities specifically geared toward all EL families, above and beyond events and activities to which parents of all students are invited.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>2. The district provides parents of all ELs with written notification that outlines their child's identification as an EL and placement in a language instruction education program (LIEP). The notification includes the following:</p>

### English Learners District Monitoring Indicators

- The reason for identification of the child as an EL;
- The child's level of English language proficiency, how the level was assessed and the status of the child's academic achievement;
- Methods of instruction used in the program in which the child is, or will be, participating, and the methods of instruction used in other available programs, including how the programs differ;
- How the program will meet the educational strengths and needs of the child and help the child achieve English language proficiency, and meet academic standards;
- Exit requirements for the program, expected rate of transition to a classroom not tailored for EL students and expected rate of high school graduation;
- In the case of a child with a disability, how the program meets the annual goals in the child's individualized education program (IEP); and
- Information regarding parents' right to withdraw the child from a program upon their request, and to decline enrollment or choose another program or method of instruction, if available.

The written parental notification is provided no later than 30 calendar days after the beginning of the school year or within the first two weeks (14 calendar days) of placement in an LIEP for students who enroll after the start of the school year. [See ESSA 1112(e)(3)(A).]

*Please refer to the parent notification letter guidance and templates available on KDE's [English Learner and Immigrant Resources](#) webpage for additional information.*

**Required Documentation:** Sample, dated parent notification of student placement in an EL program, including all required information and corresponding enrollment dates for the students for which the notifications were produced. PII should be redacted from any notifications submitted.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

### VI. Parent and Family Engagement

Districts selected for monitoring should upload one to two pieces of relevant documentation for each indicator. Please note, districts and schools must comply with all required activities even if funds are not reserved.

### Parent and Family Engagement District Monitoring Indicators

1. The district has a written parent and family engagement (PFE) policy developed jointly with parents. The policy establishes the district's expectations and objectives for meaningful parent and family involvement and meets all requirements for a district-level parent and family engagement policy as outlined in ESSA, including providing a description of *how* the district will meet the requirements outlined in ESSA. [ESSA 1116(a)(2).]

*Refer to the [district policy template](#), [policy and compact frequently asked questions](#) and [district PFE policy checklist](#) on KDE's website for policy requirements.*

**Required Documentation: (1)** District-level parent and family engagement (PFE) policy, evidence of distribution of the policy to all participating families (e.g., inclusion in student handbook, posted to district website, etc.), including language accessibility where applicable and to the extent practicable. **(2)** Evidence that parents participated in the development of the policy (survey results and analysis, meeting invitations, agendas and detailed minutes, documents showing revisions, etc.)

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

## Parent and Family Engagement District Monitoring Indicators

### Notes:

2. The district can demonstrate that activities within the policy are being implemented. [ESSA 1116 (a)(2).]

**Suggested Documentation:** Invitations, meeting agendas and detailed minutes, sign-in sheets, letters, flyers, website/handbook information, training materials, or other strong documentation supporting the following:

- Parent participation in the development and review of district and school PFE policies, the CDIP, CSIPs
- Examples of parent and family events for the current school year that include opportunities for all parents, including those who lack literacy/language skills, are disabled, are economically disadvantaged or are homeless, to participate in the education of their children.
- Involving parents in the activities of the schools served under Title I. *This may include establishing a parent advisory board.*
- Educating school level staff, with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with and work with parents as equal partners.
- Assistance provided to parents in understanding such topics as state academic standards, state and local academic assessments, the requirements of Title I, and how to monitor a child's progress and work with educators to improve the achievement of their children.
- Communication of events, opportunities and information regarding school reports is provided in a format and, to the extent practicable, in a language parents understand.
- Materials and training provided to help parents work with their children to improve their children's achievement, such as literacy training and using technology.
- Support provided to schools to help plan and implement involvement activities.
- Coordination of Title I parent engagement strategies with other programs to encourage parents in more fully participating in the education of their children.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

### Notes:

3. The district annually conducts, with the meaningful involvement of parents and family members, an annual evaluation of the content and effectiveness of the district-level parent and family engagement policy in improving the academic quality of all schools served by Title I, including identifying—
- barriers to greater participation by parents in activities (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy or are of any racial or ethnic minority background);
  - the needs of parents and family members to assist with the learning of their children, including engaging with school personnel and teachers; and
  - strategies to support successful school and family interactions.

The district uses the findings of evaluations to design evidence-based strategies for more effective parental involvement, and to revise, if necessary, the parent and family engagement policies described in this section [ESSA 1116 (a)(2)(D).]

**Suggested Documentation:** Copy of evaluation used for parent and family engagement activities. Results from the evaluations, which may be from the previous year with PII redacted. Meeting agendas/detailed minutes to show that discussions have occurred after evaluation to discuss results and design evidence-based involvement strategies.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

## Parent and Family Engagement District Monitoring Indicators

### Notes:

4. Parents are involved in deciding ways in which parent and family engagement funds are used and the types of activities that are provided. [See ESSA 1116(a)(3)(B).]

**Suggested Documentation:** Surveys, meeting agendas/detailed minutes or other methods of communication in which parents were given opportunities to provide input on the use of funds and activities for engagement.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

### Notes:

5. If the district receives a Title I allocation over \$500,000, at least 1% of the district allocation (including funds transferred in) are budgeted for parent-involvement activities. At least 90% of the required parent and family engagement set-aside is distributed to the schools. [See ESSA 1116(a)(3).]

**Required Documentation:** KDE monitoring staff will verify this through the EERP budget report submitted in the fiscal management section and the GMAP application.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

### Notes:

6. Parent and family engagement funds are used for at least one of the following:

- Supporting schools and nonprofit organizations in providing professional development for the LEA and school personnel regarding parent and family engagement strategies, which may be provided jointly to teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, early childhood educators and parents and family members.
- Supporting programs that reach parents and family members at home, in the community and at school.
- Disseminating information on best practices focused on parent and family engagement, especially best practices for increasing the engagement of economically disadvantaged parents and family members.
- Collaborating, or providing sub-grants to schools to enable such schools to collaborate, with community-based or other organizations or employers with a record of success in improving and increasing parent and family engagement.
- Engaging in any other activities and strategies that the LEA determines are appropriate and consistent with the district parent and family engagement policy. [See ESSA 1116(a)(3)(D).]

**Suggested Documentation:** Examples of parent and family events for the current school year that include opportunities for all parents, including those who lack literacy/language skills, are disabled, are economically disadvantaged or are experiencing homelessness, to participate in the education of their children (this may be included in school-level documentation). PII should be redacted from documentation prior to submission.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

### Notes:

7. The district notifies parents that they may request, and the district will provide, information regarding any state or district policy regarding student participation in any assessment mandated by ESSA 1111(b)(2) and by the state or district. [See ESSA 1112(e)(2)(A).]

*Please note parents cannot opt to exempt their child(ren) from participation on state assessments, however, this notification still must be sent. Please refer to the sample notice of Testing Transparency linked in the Title I Handbook.*

**Parent and Family Engagement District Monitoring Indicators**

**Required Documentation:** Annual testing transparency letter (this may include a stand-alone letter and/or information included in a handbook or posted on the district website).

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

8. The district makes additional testing transparency widely available through public means, including posting in a clear and easily accessible manner on the district's website and where practicable, on the website of each school served by the district). The following information is provided by each grade served by the district: information on each assessment request by the state to comply with ESSA 1111, other assessments required by the state, and where such information is available and feasible to report, assessments required districtwide by the district including:

- Subject matter assessed
- Purpose for which the assessment is designed and used
- Source of the requirement for the assessment
- Where such information is available: Amount of time students will spend taking the assessment and the schedule for the assessment and the time and format for disseminating the results. [See ESSA 1112(e)(2)(B).]

**Required Documentation:** Testing transparency information posted on the district website in a clear and easily accessible manner.

**Suggested Documentation:** Testing transparency information posted on the school websites in a clear and easily accessible manner.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

9. Parents annually receive notification of their right to request teacher qualifications. [See ESSA 1112(e)(1)(A).]

**Required Documentation:** Annual notification of parents' rights to request teacher qualification (this may include a stand-alone letter and/or information included in a handbook or posted on the district website)

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

**VII. District Level Program Design and Effectiveness**

Districts selected for monitoring should upload one to two pieces of relevant documentation for each indicator.

**District Level Program Design and Effectiveness District Monitoring Indicators**

1. The district can demonstrate how the plan is coordinated with other programs such as: the Individuals with Disabilities Education Act, the Rehabilitation Act of 1973, the Carl D. Perkins Career and Technical Education Act of 2006, the Workforce Innovation and Opportunity Act, the Head Start Act, the McKinney-Vento Homeless Assistance Act, the Adult Education and Family Literacy Act, and other Acts as appropriate. [See ESSA Section 1112 (a)(1)(B)].

**Suggested Documentation:** Agendas, detailed meeting minutes of leadership level meetings that demonstrate coordination of other programs and funds listed.

District Level Program Design and Effectiveness District Monitoring Indicators	
<p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>	
<p>2. If applicable, the district can describe how they support, coordinate and integrate services provided under Title I with early childhood education programs at the district or individual school level, including plans for the transition of participants in such programs to local elementary school programs. [See ESSA 1119.]</p> <p><b>Suggested Documentation:</b> Flyers, social media posts or other methods of communication related to early childhood education, agendas/detailed meeting minutes to demonstrate early childhood education coordination.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>	
<p>3. The Title I, Part A coordinator has effective written processes and procedures in place to verify that the activities/strategies in the approved application for the Schoolwide Program (SWP) and Targeted Assistance School (TAS) are being implemented effectively. [See ESSA 1112 (a)-(c); ESSA 8306; and Parts 76 and 200 of the Education Department General Administrative Regulations (EDGAR).]</p> <p><b>Suggested Documentation:</b> Description of the process or the plan, such as a 30-60-90-day plan, used to monitor and evaluate the implementation of district and school programs to ensure alignment with the approved application and effectiveness; district and school evaluation results used to determine the effectiveness of Title I programs.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>	
<p>4. The district Title I coordinator works in consultation with school councils, principals, teachers and other school personnel to analyze data and evaluate the SWP or TAS program plan for effectiveness in addressing the major problem areas and, in turn, increasing student achievement, particularly for the lowest achieving students. [See ESSA 1114(b)(3); <a href="#">34 CFR 200.26(c)</a>.]</p> <p><b>Suggested Documentation:</b> Description of the process or the plan, such as a 30-60-90-day plan, used to monitor and evaluate the implementation of district and school programs to ensure alignment with the approved application and effectiveness; district and school evaluation results used to determine the effectiveness of Title I programs.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>	
<p>5. The district ensures that all teachers and paraeducators working in a Title I-funded school meet state certification or qualification requirements. <b>Note: This applies to all staff in a schoolwide program and those paid (fully or in-part) with Title I funds in a targeted assistance program.</b> [See ESSA 1112(c)(6) and <a href="#">34 CFR 200.58</a>.]</p> <p><b>Required Documentation:</b> Certification and qualification records for teachers and paraeducators working in Title I schools as defined in question 5 (to include transcripts or proof of Kentucky Paraeducator Assessment (KPA) completion of all paraeducators working in Title I schools, including paraeducators employed by the district to provide instructional support to a public school teacher who provides equitable services to eligible private school students).</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p>	

**District Level Program Design and Effectiveness District Monitoring Indicators**

**Notes:**

**VIII. Services to Eligible Private School Children**

Districts serving private schools selected for monitoring should upload one to two pieces of relevant documentation for each indicator. Please note, it will be necessary to schedule an interview with private school officials at their location.

**Services to Eligible Private School Children District Monitoring Indicators**

1. The district has effective policies and procedures in place to verify that all students that attend private schools serviced by Title I, Part A come from participating public school attendance areas. [See ESSA 1117(c).]

**Required Documentation:** List of all private and home schools contacted by the district for the current school year, written procedures outlining how private schools are contacted regarding participation in the Title I program. **Note: The list of schools contacted should not include PII.**

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

2. The district contacted private schools within and outside of the district serving students from participating public school attendance areas to offer equitable services. [See ESSA 1117(b).]

*Please note, KDE staff can follow up to see if the district consistently reports private school data on the Declaration of Participation. Although the Declaration does not specifically collect information about Title I, Part A, it can be used as an indicator of whether the district consistently and appropriately meets its responsibilities for offering services to private schools.*

**Required Documentation:** Dated communication (email or letter) inviting private schools to participate in services.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

3. The district complied with the requirements for consultation with private school officials in a timely manner. [See ESSA 1117(b).]

**Required Documentation:** Completed and signed equitable services consultation packets for each participating private school.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

4. The district developed, in consultation with the private school, a process to use multiple, educationally related criteria to identify eligible private school students for Title I services. Note: The low-income students that generate funding for Title I, Part A services are not necessarily those that will qualify and receive services. [See ESSA 1117(b).]

**Required Documentation:** Listing of low-income data for private school students with PII redacted.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

**Services to Eligible Private School Children District Monitoring Indicators**

5. The district consulted with private school officials to determine the measure used to identify low-income private school students who generated funding for services. The measure is comparable to the low-income measure used by the district. [See ESSA 1117(b).]

**Required Documentation:** Listing of low-income data for private school students with PII redacted. The number of low-income students attending private schools should align with the number in the GMAP application.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

6. The district has effective policies and procedures in place to resolve complaints against its administration of private school services, particularly if private school officials believe that timely and meaningful consultation has not occurred. The policies and procedures direct appeals to KDE if the district resolution is not satisfactory to the private school's officials. The district has explained the complaint policy and process to private school officials. [See ESSA 1117(c)(2).]

**Required Documentation:** Copy of the private school complaint policy and observation during interviews with the private school that the complaint process has been explained by the district.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

7. The district provides equitable services to eligible private school students based on the consultation agreement. Services started at the same time services started for public school children. [See ESSA 1117(a)(3).]

**Required Documentation:** Evidence that services support those listed in the equitable services consultation packet and began on or around the beginning of the school year.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

8. Services effectively supplement and coordinate with regular services provided in the classroom and hold reasonable promise of improving student academic performance. [See ESSA 1117(a)-(c).]

**Required Documentation:** Evidence that services support those listed in the equitable services consultation packet.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

9. The district has policies and procedures in place to effectively exercise administrative direction and control over all aspects of private school services including the obligation of funds, hiring of staff and materials, equipment and property that support services to private school children. The district maintains an inventory of materials and supplies as applicable. [See ESSA 1117(d).]

**Suggested Documentation:** Inventory of equipment and supplies used to provide private school services, employment or service contracts for private school service providers.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

10. The district allocates a percentage of the private school reservation in administrative costs for any staff



**Services to Eligible Private School Children District Monitoring Indicators**

member overseeing equitable services who is paid in part or in full with Title I funds. [See [2 CFR 200.403\(a\)](#) and [200.404](#).]

**Required Documentation:** FY2024 GMAP private school pages and private school EERP (310LN and 310LP) showing equitable services administration where applicable.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

11. The district has effective policies and procedures in place to assess the effectiveness of the Title I, Part A program toward enabling participating private school children to meet the standards agreed upon by the district and the private school. The program is adjusted because of the evaluation process. [See ESSA 1117(b).]

**Suggested Documentation:** Meeting agendas and detailed minutes or other strong documentation in which the monitoring and evaluation of services and student achievement are discussed.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

12. The providers of services (i.e., teachers, paraeducators) are under contract with the public-school district or employees of a third-party contractor and not under a contract as a private school employee during the time that Title I services are occurring. [See ESSA 1117(d).]

**Required Documentation:** Time and effort records for district-contracted staff providing services for the 2024-2025 school year or contracts for third-party providers.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

13. The Title I teacher and paraeducator employed by the district to provide equitable services to identified private school students meet the qualification requirements. [See ESSA 1112(c)(6).]

*Please note, this requirement does not apply to teachers or paraeducators hired through a third-party contractor.*

**Required Documentation:** Staff credentials for those providing services.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

14. If the district employs a paraeducator, the paraeducator is under the direct supervision of a public school-employed teacher. [See ESSA 1111(g)(2)(M) and question D-1 of the [Title I Paraprofessionals Non-Regulatory Guidance](#).]

**Suggested Documentation:** Teacher and paraeducator schedules showing the paraeducator works in close and frequent proximity with the teacher.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

15. The district has provided opportunities for teachers of participating private schools and third-party contracted employees to participate, on an equitable basis, in professional development activities. [See ESSA

Services to Eligible Private School Children District Monitoring Indicators
<p>1117(a)(1)(B).]</p> <p><b>Required Documentation:</b> As applicable, professional learning attendance documentation for private school teachers of participating students and those district-contracted staff providing services.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>16. The district monitors and ensures effective, ongoing communication occurs between the Title I teacher and parents of Title I participants concerning students' academic success. [See ESSA 1117(a)(1)(B).]</p> <p><b>Suggested Documentation:</b> Sample communications between private school service providers and parents of participating students with PII redacted.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>17. There are effective parent and family engagement activities in place between the district and the parents of the private school participants. [See ESSA 1117(a)(1)(B).]</p> <p><b>Suggested Documentation:</b> Examples of parent and family engagement activities.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>18. The district ensures that services, materials and equipment are secular, neutral and non-ideological. [See ESSA 1117(a)(2).]</p> <p><b>Suggested Documentation:</b> Strong documentation (meeting agendas and detailed minutes, email correspondence, etc.) demonstrating the services, materials and equipment being used with participating private school students have been discussed.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>

## IX. Fiscal Management

Districts selected for monitoring should upload one to two pieces of relevant documentation for each indicator. Please note, it will be necessary to schedule an interview with the finance officer.

Fiscal Management District Monitoring Indicators
<p>1. Schools' and the district's staffing and financial expenditures/obligations are consistent with the approved GMAP application. [See ESSA 8306(a)(1) and Parts 76 and 200 of EDGAR.]</p> <p><b>Required Documentation:</b> Detailed month-to-date EERP budget report broken down by location with purchase order-level details for the <b>current fiscal year</b> showing all projects (310L, 310LM, and if applicable 310LN and 310LP) budgeting and expenditures to-date.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>2. Separate accounting of Title I funds is maintained in EERP by individual school. [See ESSA 8306(a)(5) and Parts</p>

Fiscal Management District Monitoring Indicators
<p>76 and 200 of EDGAR.]</p> <p><b>Required Documentation:</b> Detailed month-to-date EERP budget report broken down by location with purchase order-level details for the <b>current fiscal year</b> showing all projects (310L, 310LM, and if applicable 310LN and 310LP) budgeting and expenditures to-date. The total amount budgeted for each served school should align with the Per Pupil Amount (PPA) page in the approved GMAP application and the total allocations should not be overspent.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>3. The district's supplement, not supplant, methodology includes the following information:</p> <ul style="list-style-type: none"> <li>• 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 the district uses for the education of students;</li> <li>• 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;</li> <li>• An accompanying narrative to explain the funding and staffing distributions; and</li> <li>• Supporting documentation. [See ESSA 1118(b).]</li> </ul> <p><i>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 from this requirement. Please see the <a href="#">U.S. Department of Education informational document</a>, Question 26, p. 20 for information on exemptions.</i></p> <p><b>Required Documentation:</b> Unless exempt, the district's supplement, not supplant methodology and data with real calculations that supports the district's methodology.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>4. The district has adopted and implemented standard written allowability procedures in place outlining the steps taken by the district to ensure all purchases made with Title I, Part A funds are allowable. The procedures, at minimum, address whether purchases are reasonable, allocable, necessary and documented. [See ESSA 8306(a)(1) and Parts 76 and 200 of EDGAR.]</p> <p><b>Suggested Documentation:</b> The district's written allowability procedures and evidence that the procedures are being implemented with fidelity.</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p> <p><b>Notes:</b></p>
<p>5. The district adequately safeguards all assets purchased with Title I funds to ensure that they are used solely for authorized purposes. Internal controls, including an inventory of Title I purchases where applicable, are in place. [See ESSA 8306(a)(6)(B), Parts 76 and 200 of EDGAR, <a href="#">2 CFR 200.302</a> and <a href="#">2 CFR 200.318</a>.]</p> <p><b>Required Documentation: (1)</b> Internal written process or procedures outlining the steps taken by the district to ensure the safeguarding of assets purchased with Title I funds <b>and (2)</b> evidence that the process is being implemented with fidelity (inventory, tagging/labeling, etc.).</p> <p><b>District Compliance:</b> <input type="checkbox"/> Not Applicable <input type="checkbox"/> Doesn't Meet Requirements <input type="checkbox"/> Meets Requirements <input type="checkbox"/> Exceeds Requirements</p>

**Fiscal Management District Monitoring Indicators**

**Notes:**

6. The district disposes of unneeded Title I equipment in accordance with appropriate regulations. [See ESSA 8306(a)(1) and Parts 76 and 200 of EDGAR.]

**Suggested Documentation:** Disposal policies and procedures and an inventory of disposed items if applicable.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

7. 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 report: date of data pull, enrollment numbers, FTE staffing lists, and as applicable, the salary data.

*Please note, some districts are exempt from calculating comparability. The monitoring notification letter the district receives from KDE will indicate if the district is exempt from this requirement.*

**Required Documentation: (1)** Enrollment Summary Reports from Infinite Campus with an effective date that matches the date listed on the 2024-2025 Comparability Report **and (2)** staffing list by location and funding source with the full-time equivalency (FTE) of each position. The list should clearly delineate the staff counted toward the comparability report (staff paid with state and local funds) as well as staff excluded from the report (staff paid with federal funds). 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:**

8. Title I records are retained in accordance with 2 CFR 200.334. [See ESSA 8306(a)(1) and Parts 76 and 200 of EDGAR, [2 CFR 200.334](#).]

**Suggested Documentation:** Records retention policies and written procedures outlining the steps taken by the district to ensure the appropriate records are retained.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

9. The district has written procedures in place describing how the expenditure of funds in meeting the 15% carryover provision is monitored. If the district was granted a carryover waiver within the previous three years, this may indicate policies and procedures are not in place or are not being followed. [See ESSA 1127.]

**Required Documentation: (1)** 15% carryover monitoring policies and written procedures **and (2)** evidence that the procedures for the monitoring of timely expenditure of funds 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).

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

10. No more than 15% of the previous fiscal year's allocation was carried over to the current fiscal year. If the district carried over more than 15%, the approved carryover limitation waiver request is on file with KDE. [See

## Fiscal Management District Monitoring Indicators

ESSA 1127.]

**Required Documentation:** (1) EERP budget report for the previous fiscal year (310K, 310KM, 310KN, 310KP) for the period 7/1/2023 – 9/30/2024. (2) 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:**

11. If funds were carried over from the previous fiscal year to the current in the following categories: homeless, parent and family engagement, and services to eligible private school children, those funds were spent for activities in the same categories, in addition to the required set-asides for the current year. [See ESSA 1127.]

**Required Documentation:** Detailed month-to-date EERP budget reports with purchase-order level details *for the previous fiscal year* that show Homeless (310K), Private School (310KN and 310KP) and Parent and Family Engagement (310KM) expenditures. If funds were carried over in these categories, the district should have plans in place and be able to speak to how the funds will be spent.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

12. The district has written procedures in place for time and effort. These written procedures should be specific to the district and include instructions for:

- The completion of time and attendance reporting;
- The approval cycle that is required;
- The processing of personnel charges to federal awards;
- The internal review process that will be established to ensure effective internal control over the federal award; and
- The necessary adjustment required so that the final amount charged to the federal award for the salary is accurate, allowable and properly allocated. This justification must occur at least annually.

The time and effort procedures accurately reflect the work performed and include a process for after-the-fact reporting. [2 CFR 200.430(i).]

**Required Documentation:** Written time and effort procedures outlining the steps the district will take to 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.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

13. The district maintains documentation for any employees paid in full or in part with Title I funds to support the allocability, veracity and accuracy of the work performed. [[2 CFR 200.430 \(i\)](#).]

**Suggested Documentation:** Documentation to support the allocability, veracity and accuracy of the work performed for all employees paid in whole or in part with Title I funds as specified in the district's time and effort procedures. Documentation such as signed, dated semi-annual certification and/or monthly personnel activity (PAR) reports, or another prior KDE-approved documentation system must support the district's written time and effort procedures.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

**Fiscal Management District Monitoring Indicators**

14. Districts required to have an annual local audit charged only the Title I portion of the audit to the Title I account, if applicable. [See ESSA 8306(a)(1) and Parts 76 and 200 of EDGAR.]

**Required Documentation:** If applicable, the month-to-date EERP budget report demonstrating that only the Title I portion of the audit was charged to the Title I account. The amount should align with the amount in the approved GMAP budget.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

15. The district has adopted a written procedure for the receipt and resolution of complaints alleging a Title I, Part A violation. [See ESSA 8503 and [704 KAR 3:365](#).]

**Required Documentation:** Complaint or grievance policies and procedures. Evidence the procedures have been followed, as applicable.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

16. The two most recent financial audits are free of any Title I, Part A findings. If there were findings, they have been resolved or are in the process of being resolved. [See ESSA 8306(a) and Parts 76 and 200 of EDGAR.]

**Required Documentation:** Local audits can be found on the KDE website.

**District Compliance:**  Not Applicable  Doesn't Meet Requirements  Meets Requirements  Exceeds Requirements

**Notes:**

17. The Office of the Inspector General's [fraud hotline poster](#) is on display in a public place at the district office and all Title I schools. The district annually notifies employees of their responsibility to report fraud.

**Required Documentation:** (1) Observations by KDE staff that the poster is on display. (2) Evidence that employees have been notified of their responsibility to report fraud during the current school year (email correspondence, meeting materials, etc.).

**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.

### District Title I Plan and Eligible Public School Allocations

- District staff can articulate the process for allocating funds.
- Consultation between district staff and principals continually occurs regarding budgeting/use of funds, ensuring schools' needs are met.
- District improvement plans are reviewed continually throughout the year. New needs are identified.
- The district uses multiple data sources (both quantitative and qualitative) to determine needs.
- Meeting agendas and/or minutes maintained as documentation contain sufficient detail such as the date, attendees, topics of discussion and a summary of the discussion.
- State test scores reflect growth in achievement across all subpopulations.

### Institutions for Neglected Children

- Neglected facility staff can describe the consultation process and the services being provided to the facility's students.
- Consultation and services descriptions are consistent with what is described during district interviews.
- District staff can explain the process used to determine the amount of funding reserved for the neglected institution.

### 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.

### Homeless Children and Youth

- Homeless liaisons should be familiar with the responsibilities of their role. (See [National Center for Homeless Education brief](#)).
- Homeless set-aside funds are being spent on student needs with a focus on educational programming and are not carried over year to year.
- Homeless students are identified in relative proportion to the district's poverty percentage.
- No complaints concerning enrollment or school placement of homeless students have been filed.
- District staff can describe the processes to ensure the best placement for homeless students.
- Notifications of Rights are posted in other media that have wide ranging availability to the community.
- Staff can articulate the dispute resolution process and have access to the documentation regarding the dispute resolution process.
- Homeless reservation funds are spent in a timely manner in the school year for which they are appropriated, to meet the needs of identified students.
- To ensure credit, including partial credit, is awarded for all coursework satisfactorily completed by homeless children and youth, the district may adopt procedures providing for the following, as outlined in [704 KAR 7:090\(2\)\(6\)](#):
  - The timely placement of a homeless student in electives comparable to those in which the student was enrolled in or earned partial credit for the successful completion of at the previous schools;

- Engaging homeless students and unaccompanied youth by offering curricula that connect schoolwork with college and careers;
- Flexibility for homeless students and unaccompanied youth to complete credits, particularly those required for high school graduation, which may include flexible scheduling options, open entry and exit, extended year programming, or self-paced learning-based on competency;
- Small, personalized learning environments for homeless students;
- Blended learning opportunities such as computer-based or digital learning options for homeless students;
- Work-based learning programs, apprenticeships or alternative education programs that allow homeless students and unaccompanied youth to recover credits to earn income while completing credits; or
- The integration of content standards from multiple subject areas into a single course for which students can earn simultaneous credit. Curriculum for integrated courses addresses standards across subject matters and may emphasize interdisciplinary connections from technical or academic areas.

### **English Learners**

- District and schools have regular communication with EL students and families.
- District and schools provide translation and interpreting services including communications in native languages without delay.
- Services and resources paid for with Title I, Part A funds are supplemental to the district's core LIEP as outlined in the district's Lau Plan.
- EL students receive appropriate services without delay.
- EL students receive assistive technology and supports without delay.
- Districts coordinate services between other districts, universities or other partnering organizations to provide services for students and families (interpreter).

### **Parent and Family Engagement**

- District staff can describe...
  - The district Parent and Family Engagement Policy.
  - Some of the parent and family engagement activities being implemented at the schools.
  - How a concerted effort is being made to build relationships between schools and families.
  - How the district is "thinking outside the box" to get parents to participate as active partners.
- The policy includes a date it was last reviewed and/or revised.
- Parent survey questions are focused on allowing parents to give feedback on the effectiveness of parent and family engagement activities.
- Parent and family engagement goes beyond the school-based decision making (SBDM) council representatives.
- Parent and family engagement is seen as a two-way communication tool.
  - Please note: "One Call," marquee, TV monitors, Interactive Boards, Infinite Campus access, student agendas/planners, take-home/homework folders and other one-way communications do not meet the intent of parent and family engagement under Title I, Part A, thus they would not be allowed to be paid with Title I funds.
- Activities and events paid for with Title I funds are educational in nature and designed to engage parents in improving their children's achievement. Social events and entertainment costs are not paid for with Title I funds per [2 CFR 200.438](#).



- Invitations to Title I events and requests for feedback are provided through multiple methods (flyer, social media post, email, etc.) to increase the likelihood that all families receive the message.
- The district builds capacity through:
  - The district involves parents in the development of training for teachers, principals and other educators to improve the effectiveness of such training.
  - The district provides necessary literacy training from funds received under Title I if the local educational agency has exhausted all other reasonably available sources of funding for such training.
  - The district pays reasonable and necessary expenses associated with local parental involvement activities, including transportation and childcare costs, to enable parents to participate in school-related meetings and training sessions.
  - The district trains parents to enhance the involvement of other parents.
  - The district arranges school meetings at a variety of times, or conducts in-home conferences between teachers or other educators, who work directly with participating children, with parents who are unable to attend such conferences at school, to maximize parental involvement and participation.
  - The district adopts and implements model approaches to improving parental engagement.
  - The district establishes a districtwide parent advisory council to provide advice on all matters related to parental involvement in programs supported under this section.
  - The district develops appropriate roles for community-based organizations and businesses in parent involvement activities.

#### **District Level Program Design and Effectiveness**

- Various district staff can explain and give similar answers about how they collaborate with the Title I, Part A coordinator.
- The district uses multiple data sources (both quantitative and qualitative) to evaluate program implementation and effectiveness.
- SWP and TAS plans are reviewed throughout the year.

#### **Services to Eligible Private School Children**

- District staff can describe how the district verifies students being served live within the district boundaries.
- Services are provided to private schools. These services go beyond classroom materials and professional learning.
- The district Title I, Part A coordinator oversees private school services, including tracking student performance.
- Consultation with private school officials and the evaluation of services is ongoing throughout the year. District staff consider private school official opinions and requests when designing a program to meet students' needs.
- Private school teachers working with Title I students are invited to attend professional development (PD) conducted by the district, but also have opportunities to attend PD that meets other identified needs.
- The district uses multiple, objective educational criteria to determine which students receive Title I services.
- Title I, Part A services to private schools (including professional learning, parent and family engagement, and student services) begin at the same time that the public-school system year starts.
- The list of private school students receiving services is fluid, allowing for students mastering standards to move out of the program and another student in need to enter the program.

### **Fiscal Management**

- District staff is aware of how Title I, Part A funds are being expended.
- Independent auditors have not contacted KDE concerning suspicious or questionable expenses. The Office of Education Accountability has not investigated the district in relation to its Title I, Part A program.
- District staff can explain the process for approving/denying Title I, Part A expenditures.
- 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.
- District staff can demonstrate that schools are meeting the state-funded staffing allocation prior to using Title I, Part A funds to hire staff.
- District staff can explain how assets purchased with Title I, Part A funds are safeguarded.
- The district Title I, Part A coordinator can locate Title I, Part A records and can discuss the archive procedures.
- The fraud hotline poster is linked on the district/school website.