

## Responses to Compensatory Education (CE) 2017–18 Questions from Bonnie McFarland

1. Since reviews taking place early in the year look at prior year’s documentation, will those reviews include review of Program Improvement (PI) items required in 2016–17 but removed from the 2017–18 Instrument? What documentation will be required for Alternative Supports in 2016–17?

Since no PI items will remain in the 2017–18 CE Instrument, we will not ask district’s to address any PI items from 2016–17. However, if we are looking at 2016–17 Consolidated Application and Reporting System (CARS) Title I, Part A Allocations for an early 2017–18 CE review, local educational agencies (LEAs) should be able to provide a summary budget and expenditure report for any Alternative Support reservation. LEAs should also be able to provide documentation for any other Title I, Part A reservations made in 2016–17 as well as Title I, Part A School Allocations.

Alternative Supports most likely will be included in the revised CARS Title I, Part A reports for 2017–18 but as an allowable rather than required reservation.

2. What will the expectation be for LEA plans for LEAs subject to reviews in 2017–18? Are the expectations different for Title I, II and III?

The Title I Monitoring and Support Office (TIMSO) is currently reviewing documents to remove references to the “LEA plan.” We are replacing “LEA plan” by using such phrasing as “local educational agency planning efforts” and “district level planning documents.” When reviewing LEAs during the upcoming year (2017–18), we are not requiring an LEA plan, but still expecting all provisions that were required for the plan. Therefore, you may be looking at Local Control and Accountability Plans (LCAPs), LCAP addendums, and expenditure reports during your reviews. LEAs are not required to upload LCAPs, but may choose to do so to show their expenditures. We will be looking at whatever documents the LEAs choose to upload to show that requirements are being met.

6. How will Supplement Not Supplant requirements for Title I, Part A be reviewed based on new ESSA requirements? Will this be reviewed by CE Reviewers?

Supplement Not Supplant (SNS) remains in the Every Student Succeeds Act (ESSA) and will be included in the 2017–18 CE Instrument as part of CE reviews. However, because ESSA streamlined SNS requirements and puts the responsibility on LEAs to be able to document that Title I schools received the same level of support from State and local funds before Title I, Part A funds are allocated, CE reviewers will focus primarily on Title I, Part A Comparability requirements, which are also included in the CE 2017–18 Instrument. Comparability requirements apply to comparable funding for all staff positions such as Counselors and other support staff as well as teachers and also apply to all instructional materials including instructional technology, according to guidance from the U.S. Department of Education.

7. What changes will there be in the review of time and effort reporting for Title I schoolwide programs based on ESSA supplement not supplant language?

If there is a CDE Fiscal Monitoring (FM) reviewer on the Federal Program Monitoring (FPM) visit along with the CE reviewer, then the FM staff person will be responsible for evaluating if time and effort reporting for Title I, schoolwide programs (SWPs) meet requirements. If a FM reviewer is not present on the review, then TIMSO staff are responsible for monitoring time and effort reporting. The LEA will be required to upload time accounting records, position control reports, position descriptions, and/or duty statement evidence to the California Department of Education Monitoring Tool (CMT). For each review, (whether a FM reviewer is present or not) TIMSO staff will request that the LEA provide evidence (i.e. position control report, position description and/or duty statements) for all LEA and/or site staff who are fully or partially funded with Title I, Part A funds.

The LEA must ensure that the salary and wage expenditures should be properly supported with time distribution records such as Personal Activity/Semi-annual Certification reports. All Title I, Part A charges to salaries and wages must be based on records that accurately reflect the work performed. Specifically, these records must be supported by a system of internal control which assures that charges are accurate, allowable, and properly allocated and also incorporated into the official records of the LEA.

9. What should schools be aware of with regard to school plans? What are some of the missing elements? What good and not so good practices can you share about things like Needs Assessments, Evaluation, and SSC involvement? Budget alignment?

There are multiple requirements for the school plan, e.g. Single Plan for Student Achievement (SPSA), that must be addressed by the school site council (SSC) and most of the laws pertaining to the school plan. The most important step in the development, review, update, and approval of the school plan is to have a properly constituted SSC to ensure all the work meets legal requirements. In addition, the school plan must be reviewed and approved by the local governing board and must be consistent with the district planning documents.

Best practices include ensuring that the Title I SWP at the site has completed a comprehensive needs assessment of the entire school to develop the SPSA; completed an analysis of performance data to determine student needs; established school goals for addressing the academic needs of students that are consistent with the district level planning goals; ensured that the allowable educational activities in the site plan are reasonable and necessary to achieve school goals and align with the site allocation as reported to CARS; and completed an annual evaluation that determined whether the Title I, Part A expenditures have resulted in the improvement of academic achievement for all children, especially the needs of low-achieving students and those at risk of not meeting State academic content standards.

This CE item remains the most non-compliant out of the 24 items in the CE Instrument. TIMSO reviewers have found that the school plan budget may not align with the amount that has been certified to the site in CARS. In addition, evidence (i.e. SSC meeting agendas, meeting minutes) may be missing that demonstrates that the SSC members have been involved in the development, review, update, and approval of the school plan.

10. What, if anything, might be changed to avoid the ongoing problem of CARS/SPSA budget alignment primarily for districts reviewed in January? Districts are always caught in a “time warp” in the process of completing and certifying CARS and it is impossible to have perfect alignment of CARS with the SSC approval process for SPSA budget changes.

CE reviewers do recognize the challenge of accurately projecting CARS Title I, Part A School Allocations during the time many SSCs at Title I schools are being asked to approve their SPSAs, which should include this projected allocation amount. We do understand that this is often well in advance of when CARS is open for LEAs to report and certify their current-year Title I, Part A reports. If LEAs need to make adjustments to their 2017–18 CARS reports after it closes, they may contact the ConApp Support Desk.