



# 2023-24

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## Elementary and Secondary Education Act (ESEA)

### Consolidated Monitoring Guidance Document for Local Educational Agencies

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This report is available from:

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September, 2023  
Wisconsin Department of Public Instruction

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## Overview

The Wisconsin Department of Public Instruction (DPI) developed this guidance document to provide local education agencies (LEAs) a list of the requirements and expectations for the Federal Elementary and Secondary Education Act (ESEA) programs, including specific requirements for Title I, Part A; Title II, Part A; Title III, Part A; and Title IV, Part A, as well as cross-cutting requirements for all the Titles.

LEAs are encouraged to review the requirements, ensure the required documentation is on file, and know which LEA staff could provide more insight to the LEA's level of compliance by articulating the answers to the guiding questions on an annual basis. LEAs may choose to use the document collection tool (available on this website:

<https://dpi.wi.gov/esea/esea-monitoring-process/how-should-leas-prepare-monitoring>) to house required documents.

LEAs selected for ESEA consolidated monitoring will be required to complete this process. However, it is important to note that in the fall, DPI will send each LEA selected for ESEA consolidated monitoring a document collection tool that is tailored specific to them. LEAs selected for monitoring will be required to use the document collection tool provided by DPI.

## How to Use This Guide

This guide was developed for LEAs selected for DPI's ESEA consolidated monitoring; however, all LEAs are encouraged to use it as a tool to determine compliance with the federal statutes. In addition to explaining DPI's ESEA Consolidated Monitoring process, this guide lists requirements under ESEA and a rubric to determine the level of compliance for each requirement.

This guide may feel overwhelming simply because of its size. DPI pulled the requirements into one document so all of the requirements are in one place. DPI recommends LEAs form a team (or utilize an existing leadership team) to work on gathering documents, discuss answers to the guiding questions, and assess compliance together. The team may choose to "jigsaw" the requirements by asking different staff within the LEA to be responsible for different sections.

Forming a team will bring alignment to the process as well as provide an opportunity for building capacity across staff. For example, business managers learn program requirements while program staff learn the ins and outs of the business rules.

Additionally, it is important to keep in mind that this document lists the minimum requirements for ESEA grant funds. If a team finds themselves not meeting a requirement, the LEA should reach out to DPI for support. The overarching goal for all of this work is to ensure all students receive the supports they need, when they need them, in order to be successful. If DPI can help LEAs better support teachers, who in turn better support students, then we are all meeting the goal.

Lastly, DPI is well aware of the LEAs that often go above and beyond the requirements, so please use this document as an opportunity to celebrate the work that is exemplary.

## ESEA Consolidated Monitoring Process

DPI has oversight and monitoring responsibilities to review compliance of ESEA grant programs. DPI takes a three-pronged approach to monitoring.

1. Universal monitoring - helping all LEAs understand the basic rules and requirements;
2. Targeted monitoring - providing additional supports to a targeted group of LEAs based on risk assessment factors; and
3. Comprehensive monitoring - collaborating with or coaching selected LEAs to ensure full implementation of requirements.

Being selected for targeted or comprehensive monitoring does not mean the LEAs have done something wrong. It simply means they have been identified as potentially needing more support and technical assistance from DPI based on the risk assessment.

The risk assessment factors used to determine which LEAs are selected for monitoring include student assessment and graduation data; inequitable distribution of teachers; combined allocations for all ESEA grants; monitoring history; history of past single audit findings; and history of late application and report submissions. On very rare occasions, an LEA is selected for monitoring because DPI learned they intentionally choose not to comply with one or more requirements of the federal law.

### Required Documentation for Monitoring

A desk review of documentation is part of all types of monitoring: universal, targeted, and comprehensive. LEAs demonstrate compliance by uploading artifact(s) as described in the required documentation sections in this guide. LEAs must observe all requirements of the [Family Educational Rights and Privacy Act \(FERPA\)](#) when developing and submitting documents to DPI. In other words, LEAs must ensure documents do not include any personally identifiable information (PII). LEAs will have a sufficient amount of time to upload documentation and DPI staff will review the submitted documentation prior to the visit (for targeted and comprehensive monitoring). **LEAs should not upload narrative responses to the guiding questions.** DPI will provide LEAs instructions for where and how to upload documentation.

### Guiding Questions for Targeted and Comprehensive Monitoring Visits

*The LEA and DPI will determine collectively if the monitoring visit will be held in-person or virtually.*

The purpose of the monitoring visit is to gather additional information related to each of the requirements to determine an LEA's level of compliance. **Written responses to the guiding questions are not required.** DPI staff will participate in the monitoring visit, giving the LEA an opportunity to seek support where needed or to highlight promising practices. DPI staff may not ask all of the guiding questions listed in this guide. They will only ask questions to help them better understand the LEA's level of compliance with a requirement.

It is important that LEA staff who implement the program(s) funded by ESEA grants participate in gathering and uploading required documentation, as well as speak in-depth to the programs monitored during the visit.

## Rubrics for Targeted and Comprehensive Monitoring

There is a rubric listed for each requirement. DPI staff will use these four categories to determine an LEA's level of compliance with the law.

- 1. Beginning** - There is no evidence that the LEA is in compliance or there are gaps in evidence. If an LEA is at the "Beginning" level, DPI will require corrective action and will provide support to the LEA in order to meet the requirement.
- 2. Developing** - There is documentation that the LEA is in compliance, but it lacks evidence of implementation of the requirement. If an LEA is at the "Developing" level, DPI will provide support and recommendations for improvement.
- 3. Accomplished** - There is evidence that the LEA is in compliance with the law and implements policies/procedures in accordance with the law. If an LEA is at the "Accomplished" level, no action from DPI or the LEA is necessary.
- 4. Exemplar** - There is evidence that the LEA is in compliance with the law; implements policies/practices in accordance with the law; AND demonstrates positive outcomes for students. If an LEA is at the "Exemplar" level, DPI will provide the LEA commendations for their work.

## Report/Results for Monitoring

Preliminary findings will be presented to LEAs at the conclusion of the visit. A formal written report will be sent to LEA leaders approximately six weeks after the visit. The formal report will identify strengths, weaknesses, any necessary corrective action, and will provide technical assistance if needed. If corrective action is necessary, DPI will send the LEA a final closure letter when all corrective actions are complete.

# Universal Monitoring

## Universal Monitoring General Overview

Universal monitoring is in place for all LEAs receiving ESEA funds and includes the provision for technical and adaptive assistance and support to all LEAs receiving ESEA funds. DPI has procedures in place to monitor and support all LEAs implementing and complying with federal requirements. Examples include: determining allowed costs, collecting affirmation of consultation with private school forms; and ensuring claims directly tie back to approved budgets.

## Affirmations, Applications, Budgets, and Claims

DPI administers ESEA grants through its federal grants management system, WISEgrants. WISEgrants is the foundation for universal monitoring as it aligns with the 2 CFR 200 Federal Uniform Grant Guidance, the Education Department's General Administrative Regulations, and Wisconsin's Uniform Financial Accounting Requirements. LEAs will digitally sign assurances affirming they will comply with the provisions of all applicable statutes and regulations, as well as assurances that meet the requirements of the General Education Provisions Act (GEPA) (20 U.S.C. 1232e).

LEAs are required to develop separate budgets under a single grant for public school services and private school equitable services. LEAs must tie each detailed budget item to an ESEA allowable activity. DPI staff review each budget item to ensure that it is reasonable and necessary, as well as allocable to and allowed under ESEA grants.

LEAs may only claim funds based on DPI-approved applications in WISEgrants. DPI staff review claims for reimbursement to ensure compliance with the approved budget/allowable costs. Once claims are approved by DPI's grant accountants and the LEA is paid, the DPI business office accountants request reimbursement from the federal government.

WISEgrants retains the Grant Award Notifications, grant applications, claims, and other data to meet state and federal regulations regarding records retention policies and procedures.

## Universal Monitoring for Private School Equitable Participation

### Consultation with Private School Representatives

ESEA requires LEAs to provide equitable services to students, their families and teachers in private schools, as determined in consultation with the representatives of the private school (§ 1117(b) and 8501(a)(5)). DPI monitors LEAs' compliance with equitable participation requirements through universal and targeted monitoring.

DPI's universal monitoring for private school equitable participation ensures:

- LEAs provide timely and meaningful consultation with each private school located within their district's boundaries, by requiring LEAs to upload an affirmation of consultation to their WISEgrants application. WISEgrants will not let LEAs complete their application without acceptable documentation.
- The proportional share is calculated in WISEgrants based on enrollment data certified by the LEA in WISEgrants.

- Budget items for services are reasonable and necessary, and align with the intent and purpose of the specific grant.
- LEAs provide services by periodically reviewing budget and claim data. DPI will reach out to all LEAs that are not claiming funds for equitable participation to discuss options and provide support if there are challenges to providing services.

LEAs are required to submit an [Affirmation of Consultation with Private School Officials form](#) for every private school located within its boundaries, in WISEgrants. The Affirmation of Consultation form serves as official verification that consultation occurred between an LEA and private school and indicates whether or not a private school wishes to participate and receive services under each of the Title grants. In order to ensure alignment with consultation requirements, the form includes all of the following sections: General Information, Required Consultation Topics, Uses of Funds, Participation in Services, Private School Verification, and LEA Verification.

Once the Affirmation of Consultation form is completed and signed by both the LEA and private school officials, the LEA is required to upload the form in WISEgrants. DPI staff will review each form to ensure it is completed properly. Once the LEA has submitted an acceptable affirmation form for every private school located within its boundaries, the LEA will be able to access and complete the rest of their ESEA grant applications. This ensures that a plan for services in a private school wishing to participate under a grant, has been developed and agreed upon prior to the LEA budgeting and claiming any grant funds; and therefore, that the LEA has met consultation requirements.

### Service Provision in Prior Year

In the late fall, the [ESSA Ombudsman](#) and DPI ESEA staff—including the federal fiscal monitoring consultant, grant specialist, and director—perform an annual evaluation of LEAs with participating private schools, to identify LEAs noncompliant with the equitable services provisions. The evaluation includes a review of the funds claimed for each Title grant in which an LEA had a participating private school. If an LEA claimed less than 10 percent of a grant’s private share, the LEA will be identified for additional monitoring support. As part of this monitoring, the LEA must attend a virtual webinar in the late fall, hosted by the ESSA Ombudsman and DPI. Notifications regarding the LEA’s identification for this monitoring and information for the webinar will be sent to the LEA through WISEgrants.

If the LEA fails to attend the webinar in the late fall, the LEA will receive a flag on the risk assessment process for targeted monitoring in the subsequent fiscal year. As a result the LEA may be selected for [Targeted Monitoring for Private School Equitable Participation](#); a more intensive monitoring process pertaining to the equitable participation provisions under ESEA.

Guidance on the equitable participation services—in particular an LEA’s responsibility in relation to this provision—can be found in:

- Providing Services for Equitable Participation under ESEA: [https://dpi.wi.gov/sites/default/files/imce/esea/pdf/ProvidingServicesforEquitableParticipation\\_RolesResponsibilities.pdf](https://dpi.wi.gov/sites/default/files/imce/esea/pdf/ProvidingServicesforEquitableParticipation_RolesResponsibilities.pdf); and
- Consultation Toolkit for Private School Equitable Participation: [https://dpi.wi.gov/sites/default/files/imce/esea/pdf/FY23\\_Consultation\\_Toolkit\\_for\\_Private\\_School\\_Equitable\\_Participation.pdf](https://dpi.wi.gov/sites/default/files/imce/esea/pdf/FY23_Consultation_Toolkit_for_Private_School_Equitable_Participation.pdf).



## Universal Monitoring Protocols for Public Reporting, Title I Family Engagement, and Identification of Migratory Students

DPI has identified and transitioned a limited number of compliance requirements into an online monitoring module in WISEgrants.\* This will make the ESEA Monitoring process more coherent with other resources and systems within DPI that focus on and prioritize students' social, emotional, and academic needs; ensure compliance with federal law; and minimize the administrative burden on LEAs. \* Once the online module is available in WISEgrants (tentatively opening in the winter of 2023/2024), all LEAs will be able to use it as a resource for record keeping if desired.

Each year DPI will select and require approximately 90 LEAs to upload documentation into WISEgrants for the ESEA requirements identified in Sections A - C. The deadline for submitting documentation for the 2023-24 school year will be determined once the online collection module is complete. All selected LEAs must upload documentation by the deadline identified in the LEA's ESEA Universal Monitoring notification; failure to complete the module by the deadline may result in DPI adding a risk factor identification for future ESEA Comprehensive Monitoring and/or DPI withholding payment of claims until documentation is submitted.

In the spring, DPI will randomly select at least 33 percent of those LEAs and review the uploaded documentation. If any of the requirements in Section A - C are found incomplete, DPI will reach out to the LEA to provide support and ensure corrective action is taken by the LEA.

*(\*Note: When this document was published, DPI was still developing the online module. If DPI is not able to complete the module in WISEgrants this fall, then DPI will create an alternative online module for LEAs to submit documentation.)*

# Section A - Informing Parents and Families

## A.1. Parents Right to Inquire about Professional Qualifications

At the beginning of each school year, the LEA shall notify parents of their right to inquire information regarding the professional qualifications of their students' classroom teachers and paraprofessionals including the following:

- Whether the student's teacher:
  - has met state qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction;
  - is teaching under an emergency or provisional license; and
  - is teaching in the field of discipline of the certification of the teacher.
- Whether the child is provided services by paraprofessionals and, if so, their qualifications.

*Sections 1112(e)(1)(A)*

### A.1. Required Documentation:

Communication informing parents about their rights to inquire about their child's teacher's/paraprofessional's qualification. The communication must be in a format or language that is representative of students' families in the LEA and/or accommodations are provided for accessibility. Documentation may include information posted on the LEA's public facing website, parent handbook, district board policy, etc.

### Resources

- Sample Letter to Notify Parents of their Right to Inquire about Professional Qualifications (Ohio Department of Education):  
<https://ccip.ode.state.oh.us/DocumentLibrary/ViewDocument.aspx?DocumentKey=85450>
- Example of Parents Right to Know Notification Webpage:  
<https://www.elchoschool.org/district/parent-and-guardian-right-to-know.cfm>
- Parents Right to Know ESEA Statute: <https://doe.sd.gov/title/documents/1819-ParentsRight.pdf>
- Parents Right to Know Helpful Tips- Arizona DOE:  
[https://www.azed.gov/sites/default/files/2020/09/FY21\\_Parents-Right-To-Know\\_helpful-hints.pdf](https://www.azed.gov/sites/default/files/2020/09/FY21_Parents-Right-To-Know_helpful-hints.pdf)

### A.1. Rubric

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<b>Incomplete</b>	The LEA does not have evidence of communication informing parents about their rights to inquire about their child's teacher's/paraprofessional's qualification. OR The LEA provides communication developed to inform parents, but the communication is not in formats or languages so that all parents can understand (to the extent practicable*).
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<b>Complete</b>	The LEA provides communication informing parents about their rights to inquire about their child's teacher's/paraprofessional's qualification AND the communication is in a format or language that all parents can understand (to the extent practicable*).
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*\*Extent practicable means providing resources and communications in languages that are representative of student families and/or providing accommodations and accessibility for those who are deaf, blind, or hard of hearing. The vast majority of parents and families should be able to access the information. (For example, posting information online when many families may not have readily available internet access would not meet the requirements. Similarly, providing information only in English may not meet the needs of families who speak and read other languages*

## **A.2. Teacher Qualifications**

The LEA shall provide parents timely notice that their student has been assigned or has been taught for four or more consecutive weeks, by a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned. Sections 1112(e)(1)(B)(ii)

### **A.2. Required Documentation:**

Communications developed to inform parents if their child has been taught by a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned for four or more consecutive weeks. Documentation may include information posted on the LEA's public facing website, parent handbook, district board policy, or a letter template on district letterhead.

### **Resources:**

- Sample Parent Right to Know Letter Template: <https://docs.google.com/document/d/1htgOc6OYBAoNcMiUO7EsgJtYRqsenN4g15iFymugbg0/edit>
- Parents Right to Know Statute: <https://doe.sd.gov/title/documents/1819-ParentsRight.pdf>

## **A.2. Rubric**

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<b>Incomplete</b>	The LEA does not provide communications developed to inform parents if their child has been taught by a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned for four or more consecutive weeks OR the LEA provides communication developed to inform parents, but the communication is not in formats or languages so that all parents can understand (to the extent practicable*).
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<b>Complete</b>	The LEA provides communications developed to inform parents if their child has been taught by a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned for four or more consecutive weeks. The LEA provides evidence in formats or languages that all parents can understand (to the extent practicable*).
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## A.3. Assessment Information

The LEA shall make widely available through public means, information on each federally required assessment, other assessments required by the state, and if feasible, assessments required by the LEA. *Section 1112(e)(2)(B)*

### A.3. Required Documentation

Communications used to inform parents and the public about information on each assessment required by ESEA ([Wisconsin Forward Exam](#), [Dynamic Learning Maps](#), [ACT with Writing](#), [ACCESS](#), and the [National Assessment of Educational Progress](#)), other assessments required by the state ([ACT Aspire](#) and the [Assessment of Reading Readiness](#)), and where feasible, assessments required by the LEA. Information about the assessments must include:

- Participation requirements;
- Subject matter;
- Purpose;
- When and where such information is available;
- Assessment time; and
- The schedule and format for disseminating results.

Notes:

- If an LEA does not have LEA required assessments, then no information is required for local assessments.
- LEAs must administer ACCESS for ELLs or alternate ACCESS for ELLs even if parents/families opt out of the option to participate in the LEA's language instruction education program (LIEP).

### Resources

- ESEA Public Reporting Assessment Template  
[https://dpi.wi.gov/sites/default/files/imce/esea/doc/Public\\_Reporting\\_Assessments\\_ESSA.docx](https://dpi.wi.gov/sites/default/files/imce/esea/doc/Public_Reporting_Assessments_ESSA.docx)
  - assessments are defined on this Wisconsin Student Assessment System:  
<https://dpi.wi.gov/assessment> (WSAS) webpage.

### A.3. Rubric

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<b>Incomplete</b>	The LEA does not have communications used to inform parents and the public about required assessments. Communication provided does not adhere to Personal Identifiable Information (PII) protections (i.e. includes student identifiable information). OR The LEA provides some information on the required assessments to parents and the public, BUT the communication does not provide information on all of the following: The participation requirements; The subject matter; The purpose; When and where such information is available; The assessment time; and The schedule and format for disseminating results.
<b>Complete</b>	The LEA provides information in a clear and accessible manner on required assessments. The information must be available to parents and the public on the LEA website and must include: The participation requirements; The subject matter; The purpose; When and where such information is available; The assessment time; and The schedule and format for disseminating results.

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## A.4. LEA and School Performance

The LEA shall disseminate the ESSA federal accountability report for each school and the LEA as a whole.

*Section 1111(h)(2) and Section 1112(e)(2)(B)*

### A.4. Required Documentation

A link to the LEA's public facing website that houses the LEA's WISEdash ESSA Dashboard, and guidance on how to navigate WISEdash by including this reference to the [WISEdash Help webpage](#).

### Resources

- ESEA Assessment Performance and WISEdash technical assistance: <https://docs.google.com/document/d/1OaZ5qE3KTAgHefthyUF4jbfjJ45fj74F24p3ZLNJZo/edit>
- WISEdash District Communications Support: <https://dpi.wi.gov/wisedash/help/district-support>
- A series of four short videos on the strategic assessment system: <https://dpi.wi.gov/assessment/parent-info/resources#Videos>
- A Family Guide to Annual State Tests in Wisconsin by the National PTA: <https://www.pta.org/docs/default-source/files/family-resources/2021/state-assessment-guides/wi-assessmentguide-familyguide.pdf>
- DPI's Office of Educational Accountability offers multiple websites that include brochures on different state assessments, guides for families, and a FAQ: <https://dpi.wi.gov/assessment/parent-info/resources>

### A.4. Rubric

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<b>Incomplete</b>	The LEA does not have communications used to inform parents and the public about LEA and school performance on the state assessments.
<b>Incomplete</b>	Communication provided does not adhere to Personal Identifiable Information (PII) protections (i.e. includes student identifiable information).
<b>Incomplete</b>	The LEA only provides a link to their state report card.
<b>Incomplete</b>	The LEA provides directions or a link to WISEdash, BUT does not provide guidance on how to navigate WISEdash or only provides vague guidance for WISEdash.
<b>Incomplete</b>	The LEA provides guidance on how to navigate WISEdash, BUT does not provide a link to WISEdash.
<b>Complete</b>	The LEA provides a link to WISEdash on their website AND includes guidance on how to navigate WISEdash.

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## A.5. Student Performance

Title I schools shall provide to each individual parent of a child attending the school information on the level of achievement and academic growth of their student, if applicable and available, on each of the state academic assessments required by ESSA (the Forward Exam, ACT, ACCESS for ELs, and Dynamic Learning Maps).

*Sections 1112(e)(1)(B)(i) and Section 1116(c)(4)(B)*

## A.5. Required Documentation

Communications developed to inform parents of on curriculum and their child’s level of achievement on academic assessments in a format or language that the parents can understand (to the extent practicable\*), and the LEA has systems (or internal procedures) in place to ensure these requirements are implemented.

### Resources

- Sample template cover letter for Individual Student Reports:  
[https://dpi.wi.gov/sites/default/files/imce/assessment/doc/Forward\\_ISR\\_Parent\\_Letter\\_2021-22.docx](https://dpi.wi.gov/sites/default/files/imce/assessment/doc/Forward_ISR_Parent_Letter_2021-22.docx) also available in Spanish and Hmong
- The Data and Assessments page for families includes resources on specific state assessments that can help families understand the purpose of the assessments and interpret their child’s results as a way to inform their overall learning: <https://dpi.wi.gov/assessment/parent-info/data>
- DPI’s Office of Educational Accountability has multiple websites that include brochures on different state assessments, guides for families, and a FAQ: <https://dpi.wi.gov/assessment/parent-info/resources>
- A series of four short videos on the strategic assessment system:  
<https://dpi.wi.gov/assessment/parent-info/resources#Videos>
- A Family Guide to Annual State Tests in Wisconsin by the National PTA:  
<https://www.pta.org/docs/default-source/files/family-resources/2021/state-assessment-guides/wi-assessmentguide-familyguide.pdf>

## A.5. Rubric

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<b>Incomplete</b>	The LEA does not have communication informing parents of their child’s level of academic achievement and academic growth on the state academic assessments OR the LEA has communication developed to inform parents, but the communication is not available in a format or language that the parent can understand (to the extent practicable*).
<b>Acceptable</b>	The LEA provides evidence of their communications developed to inform parents of their child’s level of achievement on academic assessments in a format or language that the parents can understand (to the extent practicable*), and the LEA has systems (or internal procedures) in place to ensure these requirements are implemented.

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## A.6. Assessment Policy

At the beginning of each school year, a LEA shall notify the parents of each student attending any Title I school that the parents may request, and the LEA will provide the parents on request (and in a timely manner), information regarding any State or local educational agency policy regarding student participation in any assessments mandated by ESSA, the State or LEA, which shall include a policy, procedure, or parental right to opt the child out of such assessment, where applicable.

*Sections 1112(e)(2)(A)*

## A.6. Required Documentation

Communications informing parents regarding student participation in any assessments required by the federal law and state law or LEA. The documentation shall include a policy, procedures, or parental right to opt the child out of such assessment, where applicable.

## Resources

- Parents Right to Know ESEA Statute: <https://doe.sd.gov/title/documents/1819-ParentsRight.pdf>

## A.6. Rubric

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<b>Incomplete</b>	The LEA does not have evidence of communication informing parents regarding student participation in any assessments required by the federal law and state law or LEA. The documentation shall include a policy, procedures, or parental right to opt the child out of such assessment, where applicable.
<b>Acceptable</b>	The LEA provides evidence of communication informing parents regarding student participation in any assessments required by the federal law and state law or LEA. The documentation shall include a policy, procedures, or parental right to opt the child out of such assessment, where applicable.

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## A.7. Language Instruction Programs

If the LEA is using funds under Title I, Part A or Title III, Part A to support the language instruction educational programs, the LEA shall inform parents of an English learner identified for participation in the program no later than 30 days after the beginning of the school year.

*Section 1112(e)(3)*

## Resources

- [DPI's Parent Notification Self-Assessment Checklist \(Please make a copy for local use\)](#)

*Note: this requirement applies to LEAs who join a consortium for Title III, Part A services.*

## A.7. Required Documentation

Communications used to notify parents of their child's identification to participate or their child's participation in an English learner program, that includes all of the following (Note: Communication must also demonstrate placement took place within the first 30 days of the school year, or two weeks from when a student enrolls after the start of school):

- The reasons for the identification of their child as an English learner and need for placement in an LIEP;
- Level of English proficiency, how English proficiency was assessed, and the status of their child's academic achievement;
- The methods of instruction used in the LIEP; and methods of instruction in other available programs, including how they differ in content instructional goals, and the use of English and a native language in instruction;
- How the LIEP will meet the educational strengths and needs of their child;
- How such program will specifically help their child learn English and meet age-appropriate academic achievement standards for grade promotion and graduation;
- The process for exiting English learner designation; including the expected rate of transition from LIEP programming and the expected graduation rate;

- In the case of a child with a disability, how such language instruction education program meets the objectives of the individualized education program for their child, as described in section 614(d) of the Individuals with Disabilities Education Act (20 U.S.C. 1414(d));
- The requirement to annually assess the student’s English language proficiency until the student reaches proficiency, independent of whether or not the parents accept or deny EL services;
- The LEA’s obligation to support students’ academic needs and allowable language services and accommodations available should a parent accept or deny services (as required under the Title VI of the Civil Rights Act of 1964 (Title VI) and the Equal Educational Opportunities Act of 1974 (EEOA));
- Information pertaining to parental rights that includes written guidance:
  - Detailing the right of a parent to immediately have their child removed from the program upon their request; and
  - Detailing the options that parents have to decline to enroll their child in an LIEP or to choose another program or method of instruction, if available; and
  - Assisting parents in selecting among various programs and methods of instruction, if more than one program or method is offered by the LEA.

## A.7. Rubric

<b>Not Applicable</b>	The LEA does not use Title I, Part A or Title III, Part A to support language instruction educational programs. (Note: This requirement applies to LEAs that join Title III consortia.)
<b>Incomplete</b>	The LEA does not have evidence that they informed parents of their child’s identification for participation in language instruction educational programs (LIEP).
<b>Incomplete</b>	The LEA has evidence of informing parents, BUT it was later than 30 days after the beginning of the school year or later than two weeks after a student enrolled in the middle of the school year.
<b>Incomplete</b>	The LEA provides evidence that they notified parents of their child’s identification as an English learner, BUT the communication is missing one or more of the required points defined in the criteria, and/or the communications to parents were not available in a format or language that the parents could understand (to the extent practicable*).
<b>Complete</b>	The LEA provides evidence that they notified parents of their child’s identification as an English learner; communications included all the required points defined in the criteria; and the communications to parents were available in a format or language that the parents could understand (to the extent practicable*).



## Section B - Title I, Part A, Family Engagement

### B.1. Title I, Part A, Annual Meeting

Each Title I school shall convene an annual meeting;

- At a convenient time, to which all parents of participating children shall be invited and encouraged to attend,
- To inform parents of their school's Title I program and provide timely information about the school's Title I program,
- Explain the requirements of the Title I program,
- Explain the right of parents to be involved in the Title I program. And, if requested by parents, provide opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible.
- Provide a description and explanation of the curriculum in use at the Title I school.

*Sections 1116(c)*

### B.1. Required Documentation

A sample agenda, powerpoint, brochure, from at least one Title I annual meeting. The documentation must include all of the requirements listed above.

### Resources

- Annual Parent Meeting Sample Agenda  
[https://dpi.wi.gov/sites/default/files/imce/engaging-families/2\\_Annual-Parent-Meeting-Sample-Agenda.pdf](https://dpi.wi.gov/sites/default/files/imce/engaging-families/2_Annual-Parent-Meeting-Sample-Agenda.pdf)
- Required components of the Annual Title I Parent Meeting  
[https://dpi.wi.gov/sites/default/files/imce/engaging-families/2\\_Required-Components-Annual-Parent-Meeting.pdf](https://dpi.wi.gov/sites/default/files/imce/engaging-families/2_Required-Components-Annual-Parent-Meeting.pdf)
- Title I, Part A, Annual Meeting - Description and Explanation of Curriculum:  
[https://docs.google.com/document/d/1GltE1AjUllvsHYLRvgl\\_aiN9RplkO9C9o9osQx8RlfY/edit?usp=sharing](https://docs.google.com/document/d/1GltE1AjUllvsHYLRvgl_aiN9RplkO9C9o9osQx8RlfY/edit?usp=sharing)

### B.1. Rubric

<b>Incomplete</b>	The LEA does not provide an annual meeting for Title I schools.
<b>Incomplete</b>	The LEA provides an annual meeting for Title I schools but does not make an effort to encourage all parents of Title I students to attend.
<b>Acceptable</b>	The LEA provides the required annual meeting for Title I schools and ensures that all parents are encouraged to attend (e.g. providing invitations in families native languages).

## **B.2. Title I, Part A, School-Parent Compacts**

Each Title I school shall jointly develop, with parents, for all children receiving Title I services, a School-Parent Compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the state’s high standards.  
*Section 1116(d)*

### **B.2. Required Documentation**

A sample school-parent compact from at least one Title I school.

### **Resources**

- Title I Family Engagement Page (See Compact Section) <https://dpi.wi.gov/title-i/family-engagement>

### **B.2. Rubric**

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**Incomplete** The LEA does not have a School-Parent Compact or does not have a School-Parent Compact for each applicable grade span or does not authentically engage parents in the development of the compact.

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**Acceptable** The LEA provides documentation of the School-Parent Compact (one school per grade span, as applicable) that includes all of the requirements, AND provides evidence that parents were authentically engaged in development of the compact.

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# Section C - Identification of Migratory Children

## Requirement C.1. Identification of Migratory Children

LEAs must have procedures in place to identify migratory students.

*Section 1111(b)(2)(B)(xi)(VI)*

*This is required for all LEAs whether or not they have or had migratory students enrolled in their LEA.*

### C.1. Required Documentation

Internal procedures used to identify migratory students and their needs.

#### Resources

- Sample procedures for identifying migrant students (English and Spanish): [https://dpi.wi.gov/sites/default/files/imce/migrant/Example\\_Questions\\_for\\_MEP\\_Enrollment\\_ENG-SPAN\\_Website.docx](https://dpi.wi.gov/sites/default/files/imce/migrant/Example_Questions_for_MEP_Enrollment_ENG-SPAN_Website.docx)
- DPI's webpage for identifying migratory students: <https://dpi.wi.gov/migrant/identifyingmigratorystudents>
- DPI's webpage for migrant status in WISEdata: <https://dpi.wi.gov/wise/data-elements/migrant-status>

#### C.1. Rubric

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<b>Incomplete</b>	The LEA does not have procedures to identify migratory students and their needs.
<b>Complete</b>	The LEA has procedures to identify migratory students and their needs.

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# Targeted Monitoring

## Targeted Monitoring Overview

Targeted monitoring is a process in which DPI provides differentiated support to LEAs selected from risk assessments conducted by DPI. In addition to the universal support provided to all LEAs during the application process, DPI staff conduct a desk review, and if necessary will hold a virtual meeting with the selected LEAs to provide more intensive guidance and support.

DPI's targeted monitoring practices include cross-cutting federal fiscal requirements set forth in the Uniform Grant Guidance. [See Appendix A](#) - Targeted Monitoring for Cross-Cutting Federal Fiscal Requirements for more details and resources.

## Targeted Monitoring for Private School Equitable Participation

In addition to the universal support provided to all LEAs with private schools within their boundaries, DPI staff conduct a desk review and virtual visit with the selected LEAs to provide more intensive guidance and support.

DPI will select approximately 15 LEAs to monitor annually. The risk assessment factors used to determine which LEAs are selected for equitable participation targeted monitoring include: 25 percent or less of the private share in one or more Title grant(s) being utilized, no private share funds being spent for one or more Title grant(s), late submission of affirmation form(s), programmatic concerns identified through universal monitoring, and/or admission by the LEA that equitable services were not provided.

## Surveying of Private Schools for Targeted Monitoring for Private School Equitable Participation

DPI will survey the private school(s) participating in the services provided by the selected LEAs. This will help DPI gain better understanding of the LEA's compliance with Requirements D.1. Ongoing Consultation and D.3 Equitable Services Provided. DPI will also ask the private school if they need additional outreach from the agency in the future.

A copy of the private school survey is available [here](#).

# Section D - Private School Equitable Participation

## Requirement D.1. Ongoing Consultation

The LEA engages in timely and meaningful consultation with all private schools located within the LEA's boundaries, regarding funds available under ESEA to address the needs of the private school students and staff members. Such consultation must be ongoing and continue throughout the implementation and assessment of equitable services.

*Section 1117(b)(3), Section 8501(c)(3)*

### D.1. Required Documentation

The LEA must upload evidence of ongoing consultation with the private school(s). Evidence may include meeting agendas or minutes, emails, and/or video/audio recordings that document continued communication between the LEA and private school(s) throughout the implementation and assessment of services.

Please Note: DPI will ask private schools as part of the private school survey to describe their experience with ongoing consultation.

### Resources

- USDE's Title I Non-Regulatory Guidance on Equitable Services:  
<https://oese.ed.gov/files/2023/05/Title-I-ES-guidance-revised-5-2023.pdf>
  - A-12: Other Documentation that Meaningful Consultation has Occurred
- USDE's Title VIII Non-Regulatory Guidance on Equitable Services:  
<https://www2.ed.gov/about/inits/ed/non-public-education/files/esea-titleviii-guidance-2023.pdf>
  - A-14: Other Documentation that Meaningful Consultation has Occurred
- DPI's Consultation Toolkit for Private School Equitable Participation:  
[https://dpi.wi.gov/sites/default/files/esea/pdf/FY23\\_Consultation\\_Toolkit\\_for\\_Private\\_School\\_Equitable\\_Participation.pdf](https://dpi.wi.gov/sites/default/files/esea/pdf/FY23_Consultation_Toolkit_for_Private_School_Equitable_Participation.pdf)

### D.1. Guiding Questions for Virtual Visit (if necessary)

1. Describe the process used to ensure the initial consultation takes place before making any decisions that affects the opportunities of eligible private school children, teachers, and other educational personnel who participate in ESEA funded programs.
2. If funds were transferred from Title II, Part A or Title IV, Part A to another ESEA program, what steps were taken to ensure the private schools were notified before the transfer was made?
3. Describe the consultation that goes on throughout the year with the private school officials. How often are meetings held? What topics (e.g family engagement, student progress, etc.) are discussed?
4. Were there any disagreements between your LEA and the private school(s) on the provision of services through a contract (vendor)? If so, how were they handled and what documentation was provided to the private school(s) explaining the reasons for the decision(s)?

## D.1. Rubric

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<b>Beginning</b>	The LEA does not provide, or is unable to provide evidence of follow-up after initial consultation. If applicable, the LEA cannot describe how the disagreement between the LEA and private school was resolved.
<b>Developing</b>	LEA engaged stakeholders in part, but not all, of the planning process. <i>Example: Stakeholders were given opportunities to influence the plan development, but were not involved in identifying the needs.</i> If applicable, the LEA can describe how the disagreement between the LEA and private school was resolved, BUT does not have documentation of the disagreement, the resolution, and the rationale for the resolution.
<b>Accomplished</b>	The LEA provides examples of communication to demonstrate ongoing consultation between the LEA and private school(s) for all applicable Titles throughout the year, AND the ongoing consultation includes discussion about student progress, implementation of services, and/or evaluations discussed for one or more applicable Titles. If applicable, the LEA can describe how the disagreement between the LEA and private school was resolved, AND has documentation of the disagreement, the resolution, and the rationale for the resolution.
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND demonstrates that ongoing consultation occurs regularly. (e.g. monthly, quarterly, etc.) If applicable, the LEA meets the criteria in the “Accomplished” category regarding the disagreement between the LEA and private school, AND describes the formal process for how disagreements are handled and documented.

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## Requirement D.2. Public Control of Funds

The LEA shall maintain all control of funds used to provide services; and title to materials, equipment, and property purchased for equitable participation.

*Sections 1117 and 8501*

### **D.2. No Documentation Required**

The LEA should prepare for this section by reviewing the process by which the LEA obligates and liquidates federal funds for equitable services. The LEA should also prepare by reviewing the process by which the private school(s) request the use of funds.

### **D.2. Guiding Questions**

1. What procedures are in place for the LEA to maintain control of the funds?
2. How are the supplies, materials, and equipment purchased to support equitable services tracked?
3. How does the LEA ensure the supplies, materials, and equipment are only used for equitable services (i.e., asset tagging, inventory procedures, etc.)?

4. Describe how the Public Control of Funds provision is communicated to private school officials.
5. How are the LEA's policies or procedures for requesting the use of funds communicated to the private school officials?

## D.2. Public Control of Funds Rubric

<b>Beginning</b>	The LEA reimburses the private schools for services. (Note: this is an unallowed practice and would require repayment of funds.)
<b>Beginning</b>	The LEA follows their policies and procedures for procuring goods and services for equitable participation, BUT does not follow its inventory control procedures to safeguard materials used for public school equitable participation.
<b>Developing</b>	The LEA follows their policies and procedures for procuring and safeguarding goods and services for equitable participation, BUT does not communicate the procedures with private school officials.
<b>Accomplished</b>	The LEA follows their policies and procedures for procuring and safeguarding goods and services for equitable participation AND communicates these procedures with private school officials.

## Requirement D.3. Equitable Services Provided

The LEA shall provide eligible private school students, teachers, and other educational personnel services that address their needs under ESEA and are equitable to the services provided to participating public school children, teachers, and other educational personnel.

The LEA shall provide services that are secular, neutral, and non-ideological.

The LEA shall ensure services under equitable participation are provided by employees of a public agency; or through contract by the public agency with an individual, association, agency, organization, or other entity.

*Sections 1117 and 8501*

## D.3. Required Documentation

The LEA must upload evidence of an equitable services plan for the requested private school(s).

Evidence of an equitable services plan must include the following (all are required):

- The multiple academic achievement measures used to determine the needs of eligible private school students;
- The equitable services provided to private school students, including family engagement activities for eligible students;
- The equitable services provided to private school teachers and other personnel;
- How and when services will be provided, as well as who will provide services (either LEA staff or vendors); and
- The measures used to evaluate the plan throughout the school year.

### D.3. Guiding Questions

1. What measures were used to determine eligible students and the needs of the private school?
2. How does your LEA ensure funds are utilized to best address the needs of students in regards to provided services?
3. How does your LEA guarantee that services are provided around the same time that public schools start services?
4. How is it determined where and by whom the services will be provided?
5. How are ESEA funded services and programs for private school students and staff monitored and evaluated?
6. Describe any barriers that may have arisen throughout the school year to impede equitable services.

### D.3. Rubric

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<b>Beginning</b>	The LEA does not have documentation of the services agreed upon or provided to private schools.
<b>Beginning</b>	The documentation does not adhere to Personal Identifiable Information (PII) protections (e.g., includes student identifiable information).
<b>Beginning</b>	The LEA has documentation of services provided, BUT does not use a variety of academic achievement measures to determine the needs of private school children and staff or a process to evaluate services provided.
<b>Developing</b>	The LEA uses multiple academic achievement measures to determine the needs of eligible private school children and staff, BUT only provides lists of services and evaluation measures, etc. A plan is not documented.
<b>Accomplished</b>	The LEA uses multiple academic achievement measures to determine the needs of eligible private school children and staff, and provides a plan for: <ul style="list-style-type: none"><li>• Services to students for applicable Titles;</li><li>• Services to private school teachers and other personnel for applicable Titles; and</li><li>• A process in place to evaluate and modify equitable services, as necessary, throughout the school year.</li></ul>
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category and demonstrates that their processes have modified services based on data or feedback from private school officials, AND/OR demonstrates positive outcomes for private school students.

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# Comprehensive Monitoring

## Comprehensive Monitoring Overview

Comprehensive monitoring includes a greater level of support to a small group of LEAs selected from a risk assessment conducted by DPI. In addition to the universal support provided to all LEAs during the application process, DPI staff conduct a desk review and on-site visit with these selected LEAs to provide more intensive guidance and support.

Being selected for comprehensive monitoring does not mean the LEAs have done something wrong. It simply means they have been identified as potentially needing more support and technical assistance from DPI based on the risk assessment. DPI encourages LEAs to view intensive monitoring as an opportunity to seek support and guidance as appropriate.

This guidance document outlines the requirements for all LEAs whether they are selected for intensive monitoring or not. It lists the required documentation LEAs need to have on file, guiding questions to drive discussions during the on-site visit, and the rubric DPI staff will use to determine an LEA's level of compliance.

Note: This guidance document does not include information regarding the requirements and supports for LEAs with schools identified for comprehensive support and interventions (CSI) under the Every Student Succeeds Act (ESSA) receive an intensive level of support from DPI regarding their evidence-based improvement strategies (EBIS) defined on this website:

<https://dpi.wi.gov/continuous-improvement>.

## Selection Process for Comprehensive Monitoring

The risk assessment factors used to determine which LEAs are selected for comprehensive monitoring include: student assessment and graduation data; inequitable distribution of teachers; combined allocations for all stimulus grants; history of past single audit findings; and history of late application and report submissions.

# Section 1 - Local Needs

## Requirement 1.1. Needs Assessment

The LEA shall use student, educator, school, and stakeholder data to review the progress of each school and identify needs. The LEA shall examine relevant data to understand students’ and educators’ most pressing needs, including the potential root causes of those needs given local context. Particular attention should be devoted to students who are not meeting the college- and career-ready standards, and any other factors as determined by the LEA.

*Sections 1112(b)(1), 2103(b)(2)(D)*

LEAs receiving a Title IV, Part A allocation over \$30,000 shall complete a needs assessment every three years, examining needs in each area of Title IV-A including: (A) access to, and opportunities for, a well-rounded education for all students; (B) school conditions for student learning in order to create a healthy and safe school environment; and (C) access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.

*Section 4106(d)*

In order to have a successful needs assessment that is both needs-driven and context-specific, the LEA should examine student, school, educator, and stakeholder data when identifying local needs:

Stakeholders	Student Data	School Data	Educator Data
Educators	Demographics	Resources	Effectiveness
Students	Achievement and Growth	Safety	Retention Rates
Families	Graduation Rates	Climate	Areas of Expertise and Shortages
Community			Job Satisfaction

The local needs should be related to the four objectives in the LEA’s ESSA Plan.

**Objective 1:** LEAs will provide every student access to a well-rounded education that meets their learning needs in an appropriate, healthy, and safe environment (including effective use of technology).

**Objective 2:** LEAs will provide professional growth and improvement opportunities for all teachers, principals, and other school leaders to further a high-quality education for all students.

**Objective 3:** LEAs will utilize evidence-based interventions and support services to ensure every student graduates from high school prepared for their college or career plans.

**Objective 4:** LEAs will make progress on closing the achievement gap for all subgroups in English language arts and math, so all students meet challenging academic standards.

### 1.1. Required Documentation

A summary of the needs assessment:

- Including the data collected and the results of the needs assessment, including root cause analysis;
- Indicating the LEA engaged in a data and practice inquiry process, reviewing all of the following: quantitative interim and summative student data, including disaggregated data for relevant student groups; qualitative data; educator practice data; root cause analysis; and all relevant plans (district strategic plan, English learner plan, building improvement plan, technology plan, etc.);

- Demonstrating the LEA focused on assets, knowledge and successes in addition to gaps and deficits;
- That identifies and prioritizes needs based on the assessment; and
- That is in an easy-to-understand and accessible (including native languages of stakeholders) format.

If the LEA received more than \$30,000 in Title IV, Part A, the LEA provides evidence that data was collected in well-rounded education, safe and healthy students and effective use of technology and the comprehensive needs assessment was completed within the past 3 years.

## 1.1. Guiding Questions

1. What data sources are readily available (student, educator, and student/staff/parent, and community data)?
2. Describe the process used (including criteria, guidance, and rubrics) to analyze and correlate data.
3. What inferences/conclusions did the LEA make based on the data analysis?
4. How has your LEA engaged in a root cause analysis to identify priority needs?
5. How are priority needs addressed to ensure equitable access to a better education for all students, specifically students of color, students experiencing poverty, students with IEPs, and English learners?
6. For LEAs receiving more than \$30,000 in Title IV-A funds,
  - a. Was a comprehensive needs assessment completed within the last 3 years?
  - b. What data sources were used to determine activities for well-rounded education, healthy and safe school environments, and effective use of technology?

## 1.1. Rubric

<b>Beginning</b>	The LEA did not provide documentation demonstrating a needs assessment was conducted.
<b>Beginning</b>	The LEA provides documentation demonstrating a needs assessment was conducted that indicated it did not use data for a needs assessment.
<b>Beginning</b>	The documentation does not adhere to Personal Identifiable Information (PII) protections (i.e. includes student identifiable information).
<b>Beginning</b>	For an LEA receiving more than \$30,000 in Title IV, Part A, the LEA does not provide evidence that data was collected in well-rounded education, safe and healthy students and effective use of technology or does not demonstrate that the comprehensive needs assessment was collected once every three years.
<b>Developing</b>	The LEA provides a documentation that indicates it engaged in a needs assessment through a data and practice inquiry process, reviewing some, but not all of the following: <ul style="list-style-type: none"> <li>● Quantitative interim and summative student data, including disaggregated data for relevant student groups</li> <li>● Qualitative data</li> <li>● Educator practice data</li> <li>● Root cause analysis</li> <li>● All relevant plans (district strategic plan, language instruction education program (LIEP) for English learners, building improvement plan, technology plan, etc.</li> </ul>

<b>Developing</b>	<p>The LEA provides a documentation that indicates it engaged in a needs assessment through a data and practice inquiry process, reviewing all of the following:</p> <ul style="list-style-type: none"> <li>● Quantitative interim and summative student data, including disaggregated data for relevant student groups</li> <li>● Qualitative data</li> <li>● Educator practice data</li> <li>● Root cause analysis</li> <li>● All relevant plans (district strategic plan, English learner plan, building improvement plan, technology plan, etc.),</li> </ul> <p>BUT the LEA focuses on gaps and deficits, with minimal attention to assets and successes.</p>
<b>Developing</b>	<p>The LEA summarizes the data collected and the results of the needs assessment, including root cause analysis, in an easy-to-understand format, but it is not accessible to all stakeholders.</p>
<b>Accomplished</b>	<p>The LEA provides documentation that indicates it engaged in a needs assessment through a data and practice inquiry process, reviewing all of the following:</p> <ul style="list-style-type: none"> <li>● Quantitative interim and summative student data, including disaggregated data for relevant student groups</li> <li>● Qualitative data</li> <li>● Educator practice data</li> <li>● Root cause analysis</li> <li>● All relevant plans (district strategic plan, English learner plan, building improvement plan, technology plan, etc.)</li> </ul> <p>AND, the LEA</p> <ul style="list-style-type: none"> <li>● Focuses on assets, knowledge, and successes in addition to gaps and deficits;</li> <li>● Identifies and prioritizes needs based on needs assessment; and</li> <li>● Summarizes the data collected and the results of the needs assessment, including root cause analysis, in an easy-to-understand and accessible (including native languages of stakeholders) format.</li> </ul> <p>AND, if the LEA received more than \$30,000 in Title IV, Part A, the LEA provides evidence that data was collected in well-rounded education, safe and healthy students and effective use of technology and the comprehensive needs assessment was completed within the past 3 years.</p>
<b>Exemplar</b>	<p>The LEA meets the criteria in the “Accomplished” category AND celebrates success, as well as uses outcome and practice data to identify areas of growth and next steps.</p>

## Requirement 1.2. Integration with Other Funds

Services funded with ESEA funds must be integrated and coordinated among ESEA Titles and with other federal, state, and local programs.

*Sections 1114 (a)(1); 1115(b)(2)(F); 1423(a)(9); 2103(b)(2)(F); 3115(a); 4110; and 8305(b)*

### 1.2. Required Documentation

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit. The LEA submitted an ESSA LEA plan and a grant application for each Title in which they received funds.

*DPI staff will review WISEgrants to make sure the LEA has an approved LEA plan and submitted the grant application for each ESEA Title where the LEA receives funding.*

### 1.2. Guiding Questions

1. How are ESEA funds integrated and coordinated to accelerate growth and positive changes for learners most at risk?
2. Describe the process used to align the identified needs to the ESEA program objectives and activities.
3. If your LEA received Title V- Rural and Low-Income School (RLIS) funding, how did you decide which programs to support with that funding?

### 1.2. Rubric

<b>Beginning</b>	The LEA did not submit one or more ESEA grant applications.
<b>Beginning</b>	The LEA does not coordinate ESEA funds with other federal, state, and local programs.
<b>Developing</b>	The LEA describes their process to align funds to identified needs at either the school or district level, BUT not both.
<b>Developing</b>	The LEA describes their plan (or process) to align funds to identified needs and/or identified priorities at both the district and school level,  BUT the LEA does not provide examples of integrated resources to accelerate growth and positive changes for learners most at risk.
<b>Accomplished</b>	The LEA: <ul style="list-style-type: none"><li>• Describes their plan (or process) to align funds to identified needs and/or identified priorities at both the district and school level, AND</li><li>• Provides examples of integrated resources to accelerate growth and positive changes for learners most at risk, AND</li><li>• If applicable, describes how they decided which Title to support with their Title V-Rural and Low-Income School (RLIS) funding.</li></ul>
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND describes their process to analyze funding and resources at both the district and school level, which includes steps to repurpose funds and/or resources to address inequities.

# Section 2 - Stakeholder Engagement

## Requirement 2.1. Ongoing Engagement with Stakeholders (Interested Parties and Families)

The LEA continuously engages a diverse group of interested parties representing historically marginalized or currently marginalized students in the implementation of ESEA programs, activities, and procedures. The LEA shall include interested parties, with special efforts to include parents and families of participating students, throughout all parts of planning, in assessing needs, decision-making processes, and as appropriate the implementation and evaluation of plans for LEAs and schools. The LEA shall ensure meaningful communication is made in a language and format that is accessible to all parents (to the extent practicable).

Interested parties include teachers, principals, other school leaders, specialized instructional support personnel, paraprofessionals, charter school leaders (where applicable), parents, students (if age appropriate), families; and depending on the context, community partners and local government representatives.

*Sections 1116(e)(3)(C); 1114(b)(2); 1115(b)(2)(E); 2102(b)(3); 3115(c)(3); 3116(b)(4)(C) and 4106(c)(1-2)*

### 2.1.a. Required Documentation - Ongoing Engagement with Interested Parties

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit.

### 2.1.a. Guiding Questions - Ongoing Engagement with Interested Parties

1. Describe the diverse collaborators in your school community? Who are your LEA's interested parties?
2. Describe the process and the frequency used to engage interested parties for continuous improvement. How is ongoing engagement of interested parties used to support and enhance the evaluation of progress for district and/or school plans?
3. Describe the cycle of the activities, number of participants, and data collected to ensure the engagement activities were perceived as relationship building by the interested parties and communities you serve.
4. Explain how the LEA ensures the voices of students with greatest needs, including populations who have been historically/are currently marginalized, are heard.

### 2.1.a. Rubric

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<b>Beginning</b>	The LEA does not provide evidence of ongoing involvement or feedback of interested parties. Meetings that include interested parties are rarely held or not at all.
<b>Developing</b>	The LEA provides evidence of ongoing engagement of interested parties that is part of the continuous quality improvement process, BUT does not include representation of student populations who have been historically/are currently marginalized*.

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<b>Developing</b>	The LEA engages interested parties who include representation of student populations who have been historically/are currently marginalized, BUT does not demonstrate how their engagement is part of the continuous quality improvement process.
<b>Accomplished</b>	The LEA engages interested parties who include representation of student populations who have been historically/are currently marginalized AND shows that the engagement is part of the continuous quality improvement process.
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND provides examples of policies/procedures that were changed based on engagement of interested parties. The LEA is able to share data documenting engagement of a significant representation of families, students, and community that result in increased student achievement.

\*Student populations who have been historically/are currently marginalized include but are not limited to students with disabilities, English learners, students who are economically disadvantaged, and students who are American Indian/Alaska Native, Asian, Black/African American, Hispanic/Latino, Native Hawaiian/Pacific Islander or two or more races.

## 2.1.b. Required Documentation - Ongoing Engagement with Families

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit.

### 2.1.b. Guiding Questions - Ongoing Engagement with Families

1. How does your LEA ensure the families of all students, including students with the greatest needs (academic, social emotional, etc.) are included?
2. How does your LEA ensure relationships are being built with families who have been historically or currently marginalized?
3. Are specific outreach initiatives provided to families in a language they can understand?
4. Describe the specific strategies used to build authentic and collaborative relationships with families. How does your LEA engage families in supporting their children’s education, in making decisions related to the education of their children, and participating in ongoing regular two-way meaningful communication?
5. Describe the efforts used to identify and engage parents and families who have limited English proficiency in regular ongoing meetings.
6. Describe the family engagement activities used to assist parents in understanding topics such as assessments, monitoring their children’s progress, and how to work with educators to improve achievement of their children.

### 2.1.b. Rubric - Ongoing Engagement with Families

<b>Beginning</b>	The LEA does not provide evidence of ongoing engagement of families, strategies to support engagement, or materials to support parents and families.
<b>Beginning</b>	The LEA provides evidence of engaging families including strategies or materials to support parents in Title I schools, but does not provide regular ongoing meetings to engage parents and families who have limited English proficiency (if receiving Title III, Part A).

<b>Developing</b>	<p>The LEA provides evidence of ongoing engagement of families as a part of the continuous quality improvement process, BUT does not include representation of student populations who have been historically/are currently marginalized.</p> <p>Engagement strategies include:</p> <ul style="list-style-type: none"> <li>• activities to assist parents in understanding topics such as assessments, monitoring their child’s progress, and how to work with educators to improve their child’s achievement, and</li> <li>• demonstrate authentic engagement where parents take part in making decisions related to their child’s education and participate in ongoing, two-way communication,</li> </ul>
<b>Developing</b>	<p>The LEA engages families who include representation of student populations who have been historically/are currently marginalized, BUT does not demonstrate how their engagement is part of the continuous quality improvement process.</p> <p>Engagement strategies do NOT include:</p> <ul style="list-style-type: none"> <li>• activities to assist parents in understanding topics such as assessments, monitoring their child’s progress, and how to work with educators to improve their child’s achievement, and/or</li> <li>• demonstrate authentic engagement where parents take part in making decisions related to their child’s education and participate in ongoing, two-way communication.</li> </ul>
<b>Accomplished</b>	<p>The LEA engages families who include representation of student populations who have been historically/are currently marginalized AND shows that the engagement is part of the continuous quality improvement process.</p> <p>Evidence of strategies or materials to support parents and families in Title I schools. Evidence the LEA provides regular ongoing meetings to engage parents and families who have limited English proficiency (if receiving Title III, Part A) including:</p> <ul style="list-style-type: none"> <li>• activities to assist parents in understanding topics such as assessments, monitoring their child’s progress, and how to work with educators to improve their child’s achievement and</li> <li>• demonstrate authentic engagement where parents take part in making decisions related to their child’s education and participate in ongoing, two-way communication.</li> </ul>
<b>Exemplar</b>	<p>The LEA meets the criteria in the “Accomplished” category AND provides examples of policies/procedures that were changed based on engagement of families. LEA is able to share data documenting engagement of a significant representation of families, students, and community that result in increased student achievement.</p>



## **Requirement 2.2. Consultation with American Indian Nations**

LEAs who educate students who are American Indian are required to consult with tribal nations and communities, or with organizations approved by the tribal nations, located in the area served by the LEA. LEAs should conduct the consultation with Wisconsin tribal nations in advance of making significant decisions regarding their ESSA LEA Plan to ensure meaningful contributions are made.

*Section 8538*

DPI encourages all LEAs to consult with their local tribal nations and/or communities in advance of making significant decisions. However, this requirement only applies to LEAs that received \$40,000 or more of Title VI Indian Education funds in Wisconsin during 2017 and/or have 50 percent or more of their student enrollment made up of American Indian/Alaskan Native students.

School District of Ashland	Lac Du Flambeau School District
Ashwaubenon School District	Madison Metropolitan School District
School District of Bayfield	Milwaukee Public Schools
School District of Black River Falls	Menominee Indian School District
School District of Bowler	Shawano School District
School District of Crandon	Seymour Community School District
Green Bay Area Public Schools	School District of West De Pere
Hayward Community School District	

### **2.2. Required Documentation**

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit. The LEA submitted required documentation with the ESSA LEA plan narrative.

### **2.2. Guiding Questions**

LEA may invite representatives from American Indian Nations to participate in this conversation.

1. Describe how ongoing consultation is maintained with American Indian Nations.
2. What successes and/or challenges were found with the consultation process?
3. How has your LEA worked with American Indian leaders and community members to:
  - Identify needs and priorities to address the American Indian students and families?
  - Develop district plans (including goals, objectives, and outcomes) and policies for programs that affect American Indian students and families?
  - Leverage American Indian cultural expertise and knowledge to support district programs involving American Indian students and families?
  - Provide American Indian leaders and community members with regular opportunities to offer input and feedback on program implementation, including the decision-making process?
  - Determine effective ways to share and use data to support American Indian students?
  - Include culturally appropriate and realistic performance measures and data collection methods?
  - Regularly inform American Indian leaders and community members of program progress and impacts?

## 2.2. Rubric

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<b>Beginning</b>	The LEA does not maintain ongoing consultation with representatives from American Indian Nations.
<b>Beginning</b>	The LEA only meets with representatives from American Indian Nations annually, BUT the meeting does not allow the representatives from American Indian Nations to provide input or feedback regarding ESEA programming.
<b>Developing</b>	The LEA meets with representatives from American Indian Nations regularly, BUT does not use data to inform decisions regarding ESEA services.
<b>Accomplished</b>	<p>The LEA meets with representatives from American Indian Nations regularly AND has a system in place to:</p> <ul style="list-style-type: none"><li>• Identify needs and priorities with regard to the development of programs to support American Indian students;</li><li>• Develop district plans, policies, goals, objectives, and outcomes for programs that affect American Indian students and families;</li><li>• Leverage American Indian cultural expertise and knowledge to support district programs involving American Indian students;</li><li>• Provide American Indian leaders and community members with regular opportunities to offer input and feedback on program implementation.</li><li>• Include representatives from American Indian Nations in the decision-making process.</li><li>• Determine effective ways to share and use data to support American Indian students;</li><li>• Include culturally appropriate and realistic performance measures and data collection methods; and</li><li>• Regularly informs American Indian leaders and community members of program progress and impacts.</li></ul>
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND has data demonstrating positive student outcomes as a result of the system developed.

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## Section 3 - Professional Development

### Requirement 3.1. Professional Development Plan

The LEA provides a description of the professional development plan focusing on teachers, superintendents, principals, and paraprofessionals in order to increase student achievement and close the achievement gap in all academic areas, between low-income and minority students and their peers.

*Sections 2103 (b)(3) (E-P); 1114(b)(7)(A)(iii)(IV); 1115(b)(2)(D); 3115(c)(2)*

#### Resources

- Hexagon Tool (developed by the National Implementation Research Network):  
[https://dpi.wi.gov/sites/default/files/imce/sspw/TSSGettingStarted\\_NIRN\\_HexagonTool.pdf](https://dpi.wi.gov/sites/default/files/imce/sspw/TSSGettingStarted_NIRN_HexagonTool.pdf)
- Ideas that Work website on evidence based practices:  
<https://osepideasthatwork.org/federal-resources-stakeholders/topical-issues/college-and-career-readiness-standards-ccrs/teachers-academic>
- Professional Learning Plan  
<https://learningforward.org/wp-content/uploads/2017/09/professional-learning-plans.pdf>

### 3.1. Required Documentation

A copy of the professional development/professional learning plan that includes all of the following:

- A description of the opportunities offered to public and private school staff;
- Strategies to address the needs of all students; and
- Alignment to the college- and career-ready standards and/or the Wisconsin Academic Standards.

Additionally, the professional development/professional learning plan must be:

- Grounded on evidence-based research; and
- Developed in collaboration with stakeholders including teachers, principals, administrators, representatives of American Indian Nations (as applicable), other appropriate school personnel, and parents of children in schools served, including parents of private school students.

### 3.1. Guiding Questions

1. Describe the professional development opportunities provided to teachers, principals, school leaders, and other instructional staff that addressed the priorities identified in the needs assessment.
2. Describe the process used to ensure that all professional learning practices, interventions, and strategies meet the most relevant level of evidence-based instructional practices.
3. How does the professional learning for teachers, principals, instructional paraprofessionals, and other school leaders support the use of high-quality instructional materials aligned to the college- and career-ready standards and/or the Wisconsin Academic Standards?
4. What actions are taken to ensure the needs are addressed for students with different learning styles, including students with special needs?
5. How are professional development activities supported by ESEA funds sustained, intensive, collaborative, job-embedded, and data driven?

6. What professional development activities were implemented with Title III funds to increase English language proficiency of students or substantially increase content knowledge and teaching skills of teachers of English learners (ELs)?
7. What activities have been used to address the needs of gifted and talented students?
8. If funds are used for Science, Technology, Engineering, and Mathematics (STEM), what activities have been offered to all instructional staff to ensure that all students, including students with disabilities, English learners, and gifted and talented students, have access to STEM education and literacy?
9. How are outcomes from professional development activities regularly evaluated for their impact on increased teacher effectiveness and their impact on student academic achievement? What changes need to be made based on those outcomes?

### 3.1. Rubric

<b>Beginning</b>	The LEA does not have a professional development plan.
<b>Beginning</b>	<p>The LEA provides a plan that:</p> <ul style="list-style-type: none"> <li>● Lacks cohesiveness and contains isolated activities;</li> <li>● Is not based on the needs of students or is not differentiated to address the students with different learning styles;</li> <li>● Does not include an evidence-based improvement strategy, or the selection is within the lower quartile of the action steps supporting implementation of instructional and leadership practices aligned to the evidence-based improvement strategy;</li> <li>● Does not include high-quality instructional materials;</li> <li>● Does not include an action plan or logic model that connects the professional development components;</li> <li>● Does not include activities implemented with Title III funds to increase children’s English language proficiency or substantially increase content knowledge and teaching skills of teachers of ELs;</li> <li>● Does not align with the college and career ready standards;</li> <li>● Does not target schools most in need, such as TSI, CSI, and ATSI;</li> </ul> <p>AND/OR</p> <ul style="list-style-type: none"> <li>● Does not include an evaluation plan.</li> </ul>
<b>Developing</b>	<p>The LEA has a plan that includes all of the requirements, BUT it includes any of the following:</p> <ul style="list-style-type: none"> <li>● The LEA selected an evidence-based improvement strategy that is not aligned to prioritized needs;</li> <li>● The LEA selected an evidence-based improvement strategy that is not aligned to the Tier 1-4 level of evidence;</li> <li>● The LEA cannot articulate the professional development plan selection process;</li> <li>● The evaluation is based on exit surveys and has very little connection to summative assessment data; AND/OR</li> <li>● The plan does not fully address the students most in need and/or does not fully address the different learning styles of students.</li> </ul>

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**Accomplished** The LEA has a plan that includes all of the requirements AND

- The plan fully supports the implementation of instructional and leadership practices aligned to the evidence-based improvement strategy;
- The ongoing professional learning (training and coaching) is reflected during the implementation of the evidence-based improvement strategy;
- The plan has a system for monitoring the use of student outcome data and educator practice data during implementation; AND
- All educators are familiar with the development and implementation of the professional development plan.

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**Exemplar** The LEA meets the criteria in the “Accomplished” category, selected an evidence-based improvement strategy that aligns with the Tier 1-3 level of evidence, *AND/OR*

- Uses correlation studies and statistical models to demonstrate the impact of professional development in student achievement, and/or
- Demonstrates that the impact on student achievement is high and scaling up is possible.

*(Note: The **WISELearn educator portal** contains an organized compilation of targeted resources to support continuous improvement activities, such as selection of an evidence-based improvement strategy.)*

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## Section 4 - English Learner Programs

Under Title VI of the Civil Rights Act of 1964 and the Equal Education Opportunities Act (EEOA), all states and LEAs must ensure that English learners (ELs) can participate meaningfully and equally in educational programs and services. Additionally, ESSA requires states to ensure LEAs meet the following requirements for EL programs.

### Resources

- DPI’s English Learner Policy Handbook: <https://dpi.wi.gov/english-learners/el-identification-and-placement>

### Requirement 4.1. Entrance and Exit Criteria

The LEA shall implement the state standardized entrance and exit procedures for English learners (ELs). This includes assurances that those students are assessed for EL status within a timely manner (30 days after enrollment) and placed in an effective language instruction educational program (LIEP).

*Sections 1112(e)(3)(A) and 3113 (b)(2)*

#### 4.1.a. Required Documentation - Entrance Criteria

- LEA procedures for the identification of English learners.
- Home language survey and screener results with PII removed, including examples of surveys translated in applicable languages caregivers can understand.

#### 4.1.a. Guiding Questions - Entrance Criteria

1. Describe the process to identify ELs eligible to access language education services. Is the state standardized home language survey administered to all families upon enrollment?
2. Describe the process for screening for potential EL status, as indicated by the home language survey.

#### 4.1.a. Rubric

<b>Beginning</b>	The LEA does not demonstrate adoption of the state standardized home language survey.
<b>Developing</b>	The LEA has some of the state standardized entrance procedures for English learners in place.
<b>Accomplished</b>	The LEA has implemented the state standardized entrance procedures for English learners.
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND provides evidence that they ensure an accurate screening result by engaging families in understanding the purpose of the survey, providing translators to support families while completing the survey, and/or having staff meet with individual families to ensure accurate placement in EL programming.

## 4.1.b. Required Documentation - Exit Criteria

**Note:** The exit criteria is defined by DPI. Students who are ELs must exit when they obtain a score of 5 on the ACCESS for ELLs, at least 4.5 on ACCESS for ELLs with evidence of language fluency based on the multiple indicator protocol.

The LEA's procedures for exiting students, which includes two-year monitoring and four-year reporting of academic assessment(s) of students that have exited EL status.

Procedures should include the following information:

- The LEA's two-year monitoring process and four-year reporting (including students who transfer into the district that may have been exited by the former district in prior years).
- The process to address any language fluency or academic gaps that remain after a student has exited the LIEP.
- The use of multiple indicator protocols.
- The process to notify parents/guardians when their child exits programming.
- The process to review data for students who have been identified for five or more years (Internal review of time-in-programming.)

Documentation of two-year monitoring for former ELs.

## 4.1.b. Guiding Questions - Exit Criteria

1. Describe the process to exit students who are ELs from the LIEP. Be sure to include the following information:
  - a. The LEA's two-year monitoring process and four-year reporting (including students who transfer into the district that may have been exited by the former district in prior years).
  - b. The process to address any language fluency or academic gaps that remain after a student has exited the LIEP.
  - c. The use of multiple indicator protocols.
  - d. The process to notify parents/guardians when their child exits programming.

## 4.1.b. Rubric

<b>Beginning</b>	The LEA does not demonstrate adoption of the state standardized exit procedures.
<b>Developing</b>	The LEA has some of the state standardized exit procedures for English learners in place.
<b>Accomplished</b>	The LEA has implemented the state standardized exit procedures for English learners AND demonstrates procedures for two-year monitoring and four-year reporting of academic progress on the state's academic assessment/s.
<b>Exemplar</b>	The LEA meets the criteria in the "Accomplished" category while demonstrating effective and meaningful communication with EL families.

\* *Practicable means that the vast majority of parents and families can access provided information. (For example, posting information online when many families may not have readily available internet access would not meet the requirements. Similarly, providing information only in English may not meet the needs of families who speak and read other languages.)*

## Requirement 4.2. English Language Proficiency Standards

The LEA shall implement English language proficiency standards that are aligned with academic content and academic achievement. *Section 1111 (b)(1)(F)*

*Note: this is required for all LEAs.*

### Resources

- English Language Proficiency Standards: <https://wida.wisc.edu/teach/standards/eld/2020>

### 4.2. Required Documentation

An LEA must submit one of the following:

- Evidence of English Language Proficiency Standards implementation;
- Evidence of participation in training activities pertaining to the English Language proficiency standards along with application to the classroom setting; OR
- A plan for English Language Proficiency Standards adoption and implementation.

### 4.2. Guiding Questions

- Describe the process used to ensure both general education and ESL teachers in all classrooms with ELs grades K-12 implement the English Language Development (ELD) standards.
  - How is your LEA building the capacity of classroom teachers, content teachers, and principals to help them understand how the ELD standards align with content standards?
- Describe how space is created for collaboration between classroom/content teachers and ESL/Bilingual professionals.
- Describe how you align the English language proficiency standards to academic standards and embed this into instruction for all classrooms with English learners present.
- If there are no students identified as ELs, describe the plan to align the English language proficiency standards to content areas. How are multilingual learners language goals targeted within this plan of service?

### 4.2. Rubric

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<b>Beginning</b>	The LEA has not implemented or aligned the English language proficiency standards. The LEA does not have a plan to ensure this requirement is met if they ever identify students as English learners (ELs).
<b>Developing</b>	The LEA has adopted the English language proficiency standards, BUT there is limited evidence of implementation and alignment within classrooms and content areas.
<b>Accomplished</b>	The LEA has implemented the English language proficiency standards AND they are aligned with academic standards. The LEA does not have any students identified as ELs, but has a plan in place to ensure this requirement is met if they ever identify students as ELs.
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND provides evidence of systemic implementation and alignment that is reflected at the classroom level, and with clear and concise language and content objectives.

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# Section 5 - Fiduciary Requirements

## Requirement 5.1. Time and Effort

Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed.

These records must:

- Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated,
- Be incorporated into the official records of the subrecipient,
- Reasonably reflect the total activity for which the employee is compensated by the subrecipient,
- Encompass both federally assisted and all other activities,
- Comply with established accounting policies and practices of the subrecipient, and
- Support the distribution of the employee's salary or wages.

*2 C.F.R. Part 200.430(i)*

### 5.1.a. Required Documentation - Written Procedures

A written description of the procedures used by the subrecipient to determine an individual's charges that are allowable and properly allocated to the applicable Title grant. The written description should address the following questions:

- Who determines whether an individual is eligible to be claimed on the grant?
- How is it determined that an individual is allowable to be claimed on the applicable Title grant (i.e. Uniform Grant Guidance, grant requirements, DPI technical assistance)?
- How is the distribution of the individual's time determined? What documents (e.g., work schedule, class schedule, etc.) are used to support actual time worked?
- How is work time documented by the individual?
- How is the time worked recorded into the payroll system?
- How is compensation allocated within the payroll system based on distribution of the individual's time worked?
- Who prepares claims for the applicable ESEA grants?
- What process is used to verify the claim agrees with the actual compensation paid to the individual?
- Who reviews claims?
- Who signs claims?
- Who files claims with DPI?

### 5.1.a. Rubric

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<b>Beginning</b>	The LEA does not have written procedures, or the written procedures don't address all of the bullet points.
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<b>Accomplished</b>	The LEA provides written procedures that address all bullet points.
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### 5.1.b. Required Documentation - Time and Effort Supporting Documentation

Sample supporting documentation for one employee identified in the budget filed with DPI for each applicable Title. The individual to be sampled will be determined by DPI.

Note: The documentation should NOT include any social security numbers, birthdays, etc.

Supporting documentation for the individual selected shall include:

1. The payroll report for the individual selected from July 1 to current date. The payroll report should include the following. If it does not, attach the following information in addition to the payroll report:
  - Dates of payroll;
  - Compensation amount paid;
  - General ledger account coding; and
  - Total activity for which the employee is compensated, not exceeding 100% of compensated activities

AND

2. Documentation supporting the actual hours worked and how the compensation is allocated for any individual who's compensation is allocated among more than one activity or cost objective; more than one federal or federal and non-federal award; or more than one indirect or direct and indirect cost activity.

*Note: Section 5.1.a. requests the LEA's written procedures for time and effort reporting while 5.1.b. requests the supporting time and effort documentation to demonstrate that the information recorded in WISEgrants for staff charged to the grant(s) is accurate.*

### 5.1.b. Rubric

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<b>Beginning</b>	The payroll report for the selected employee does not address each of the bullet points, AND/OR The LEA does not submit documentation to support employee's time worked and the allocation of the employee's compensation (time and effort reporting, work schedule, etc.), AND/OR The LEA submits documentation to support the employee's time worked and allocation of compensation, BUT the documentation shows the LEA charged more to the federal grant than the employee spent time on it.
<b>Accomplished</b>	The LEA provides a payroll report that addresses each bullet point, AND the LEA submits documentation to support employee's time worked and the allocation of the employee's compensation (time and effort reporting, work schedule, etc.), and the documentation demonstrates the LEA charges the appropriate amount of time to the applicable federal grant for that employee.

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## Requirement 5.2. Property Management

Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part under a federal award, are required until disposition takes place.

As a minimum, procedures will meet the following requirements:

- property records must be maintained;
- a physical inventory of the property must be taken and the results reconciled with the property records at least once every two years;
- a control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated;
- adequate maintenance procedures must be developed to keep the property in good condition; and
- if the subrecipient is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

2 C.F.R. Part 200.313(d)

*Note: Any property purchased for ESEA equitable services in private schools is the property of the LEA (Sections 1117 and 8501).*

### 5.2.a. Required Documentation - Policy or Internal Procedures

The local policy on capitalization of equipment, including threshold used to determine when equipment is determined to be a capital item.

#### 5.2.a. Rubric

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<b>Beginning</b>	The LEA does not provide a policy or internal procedures, or provides a policy or internal procedures that does not include the capitalization threshold.
<b>Accomplished</b>	The LEA submits a policy or internal procedures that includes capitalization threshold.

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### 5.2.b. Required Documentation - Property Records

Property records that include (all are required):

- a description of the property;
- a serial number or other identification number;
- the source of funding for the property, including the Federal Award Identification Number (FAIN) found on the subaward received from DPI;
- who holds the title;
- the acquisition date;
- the cost of the property and percentage of federal funds used for the property;
- the location of the property;
- use and condition of the property; and
- any disposition data, including the date of disposal and sale price of property.

## 5.2.b. Guiding Questions

1. What procedures are in place to ensure that new property, purchased with federal funds, is included in the LEA's property management system? How is the person responsible for property management made aware of new purchases?
2. What procedures are in place to ensure that materials and equipment purchased for private school equitable participation under ESEA programs are included in the LEA's property management system?

*Note: Any property purchased for ESEA equitable services in private schools is the property of the LEA (Sections 1117 and 8501).*

## 5.2.b. Rubric

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<b>Not Applicable</b>	The LEA provides a statement that they have never purchased capital objects with ESEA or other federal funds. <i>Note: If the LEA states it has not purchased any capital objects with ESEA funds, it should ensure that it follows the requirements in 2 C.F.R. Part 200, Subpart D, §200.313(d) for any capital objects purchased with ESEA or other federal funds.</i>
<b>Beginning</b>	The LEA purchased capital equipment with ESEA funds, but does not provide property records.
<b>Beginning</b>	The LEA provides property records that do not include all of the bullet points.
<b>Accomplished</b>	The LEA submits property records that include all of the bullet points.

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## 5.2.c. Required Documentation - Reconciliation

Evidence that a physical inventory of property was taken and the results are reconciled with property records at least once every two years, which includes:

- a description of how the inventory was taken;
- documentation reflecting a check-off of items listed in the property records or equivalent support that a physical inventory was taken; and
- date of the inventory and date of the most recent prior inventory.

## 5.2.c. Rubric

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<b>Not Applicable</b>	The LEA provides a statement that they have never purchased capital objects with ESEA or other federal funds. <i>Note: If the LEA states it has not purchased any capital objects with ESEA funds, it should ensure that it follows the requirements in 2 C.F.R. Part 200, Subpart D, §200.313(d) for any capital objects purchased with ESEA or other federal funds.</i>
<b>Beginning</b>	The LEA does not provide documentation that shows physical inventory was taken AND a reconciliation is done at least once every two years.
<b>Accomplished</b>	The LEA submits documentation that shows physical inventory was taken AND a reconciliation is done at least once every two years.

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### 5.2.d. Required Documentation - Written Procedures

Written procedures used to prevent and investigate loss, damage, or theft to equipment or supplies.

#### 5.2.d. Rubric

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<b>Beginning</b>	The LEA does not provide written procedures to prevent and investigate loss, damage, or theft to equipment or supplies.
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<b>Accomplished</b>	The LEA has written procedures in place to prevent and investigate loss, damage, or theft to equipment or supplies.
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### 5.2.e. Required Documentation - Policy

A written policy for selling property purchased with ESEA funds.

#### 5.2.e. Rubric

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<b>Beginning</b>	The LEA does not provide a policy for selling property purchased with ESEA funds.
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<b>Accomplished</b>	The LEA has a policy for selling property purchased with ESEA funds.
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# Title I, Part A Requirements

## Purpose of Title I, Part A

The purpose of this Title is to provide all children a significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

*Section 1001*

## Section 6 - Title I Schoolwide Programming

*This section is only required for LEAs with one or more Title I schools implementing schoolwide programming. This section is not required if all the Title I schools in the LEA are implementing Title I targeted assistance programming.*

### Resources

- DPI's webpage regarding Title I Schoolwide programs: <https://dpi.wi.gov/title-i/schoolwide-program>

## Requirement 6.1. Schoolwide Plan

A school shall establish a school team, including teachers, principals, other school leaders (included from LEA), paraprofessionals, parents, and other members of the community (i.e. tribal organizations present within the community, and if appropriate, specialized instructional support personnel, technical assistance providers, school staff, and if the plan relates to a secondary school, students, and other individuals determined by the school) to implement a comprehensive plan that is based on a comprehensive needs assessment of the entire school that takes into account information on the academic achievement of children in relation to the challenging academic standards, particularly the needs of those children who are failing, or are at risk of failing, to meet the challenging state academic standards and any other factors as determined by the LEA. *Section 1114(b)(2) and (6)*

### 6.1. Required Documentation

A schoolwide plan for one school implementing the schoolwide model in each applicable grade span (elementary, middle, high school) in the LEA. Each plan must demonstrate compliance with the following components:

- Results of a comprehensive needs assessment on which the schoolwide plan was based.
- Strategies the school chose to improve student learning, with a focus on addressing the needs of those children who are most at risk.
- Strategies that will improve instruction for all children, strengthen the academic program, increase the amount and quality of learning time, and provide an enriched and accelerated curriculum.
- Strategies for ongoing parent engagement, including parent engagement strategies to improve student learning (as required under ESSA Section 1116(c)(3)).
- Tools and processes to regularly monitor and revise the schoolwide plan.
- Coordination with federal, state, and local resources, services, and programs.

*Note: Schools could use their continuous improvement plans as Title I schoolwide plans, as long as those plans included the components listed above.*

## 6.1. Guiding Questions

1. Describe the process used to oversee each school's schoolwide plan implementation and annual review.
2. How does your LEA ensure that the LEA's professional development plan aligns with the needs of the schoolwide plans?

**Please have a school-level representative available (in person or via telephone) to answer the following:**

1. What are the methods used in each school to strengthen the academic programs, as well as to increase the amount and quality of learning time?
2. Describe strategies for meeting the educational needs of students who are not meeting the state's challenging academic achievement standards.
3. Describe the training/professional learning provided to staff in order to implement the schoolwide plan.
4. What are some examples of improved teaching and learning practices as a result of the evaluation process?

## 6.1. Rubric

<b>Beginning</b>	The LEA does not provide a schoolwide plan(s).
<b>Beginning</b>	The LEA has a schoolwide plan for each applicable grade span, BUT one or more of the required components is missing.
<b>Developing</b>	The LEA provides a schoolwide plan (one for each applicable grade span); the plan(s) include all of the required components; BUT any of the following occur: <ul style="list-style-type: none"><li>• There is limited evidence that the schoolwide plans are implemented with fidelity;</li><li>• The LEA does not align its professional development plan to the needs of the schoolwide plan(s); and/or</li><li>• There is limited evidence to show that the plans are intentionally used to promote and monitor student growth and achievement.</li></ul>
<b>Accomplished</b>	The LEA provides a schoolwide plan (one for each applicable grade span); the plan(s) include all of the required components; AND the LEA demonstrates that the schoolwide plans are implemented with fidelity.
<b>Exemplar</b>	The LEA meets the criteria in the "Accomplished" category AND any of the following: <ul style="list-style-type: none"><li>• Demonstrates the plans are intentionally used to promote and monitor student growth and achievement; AND/OR</li><li>• The schoolwide plan(s) aligns to the LEA's professional development plan.</li></ul>

## Requirement 6.2. Communication of the Schoolwide Plan

A school shall make the schoolwide plan available to the LEA, parents, and the public (e.g. tribal leaders and community members) in an understandable and uniform format, and to the extent practicable, provided in a language that parents can understand.

*Section 1114(b)(4)*

## 6.2. Required Documentation

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit.

## 6.2. Guiding Questions

1. Describe how the schoolwide plan(s) is made available to the LEA, the parents, and the public. *Examples of communications may include links to the schoolwide plan on the website, letters sent to parents, school board meeting minutes, etc.*
2. Describe how the schoolwide plan(s) is provided in an understandable format and in a language parents can understand.
3. How does your LEA determine that communication with parents is successful?
4. How has the school adjusted its schoolwide plan based on input and feedback from families?

## 6.2. Rubric

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<b>Beginning</b>	The LEA cannot describe how the schoolwide plan(s) is made available to parents, and/or the public. Examples of communications may include links to the schoolwide plan on the website, letters sent to parents, school board meeting minutes, etc.
<b>Developing</b>	The LEA describes how the schoolwide plan(s) was made available to parents and the public, BUT there is limited evidence that translations and multiple options for accessing and understanding the plan are offered.
<b>Accomplished</b>	The LEA describes how the schoolwide plan(s) was made available to parents and the public, AND describes how translations and assistance in understanding school jargon and navigating the school system are accessible to parents in multiple and meaningful ways (online, personal contacts, letters, parent/family meetings).
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND provides evidence that the involvement from families results in a modified plan(s).

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# Section 7 - Title I Targeted Assistance School (TAS) Programming

*This section is only required for LEAs with one or more Title I schools implementing targeted assistance programming with Title I, Part A funds. This section is not required if all the Title I schools in the LEA are implementing Title I schoolwide programs.*

## Resources

- DPI's webpage regarding Title I targeted assistance programs: <https://dpi.wi.gov/title-i/targeted-assistance>

## Requirement 7.1. TAS Eligible Students

Schools implementing a targeted assistance program may only provide services to eligible children identified by the school as failing, or most at risk of failing to meet the challenging state academic standards, based on multiple, educationally related, objective criteria established by the LEA and supplemented by the school. Children from preschool through grade two shall be selected solely on the basis of criteria, including objective criteria established by the local education agency and supplemented by the school.

Eligible children include children who:

- are economically disadvantaged, children with disabilities, migrant children, and English learners. These children are eligible for services on the same basis as other children selected to receive services;
- attended Head Start or a Title I preschool in the previous two years;
- are in a local institution for neglected or delinquent children, or attend a community day program;
- are homeless and attending any school in an LEA that receives Title I funds.

*Sections 1115(c)(1) and (2)*

## 7.1. Required Documentation

Criteria and assessment tools used for all of the following:

- Selecting eligible students for one school in each grade span in the LEA (elementary, middle, high) that has a targeted assistance program. If services are provided in grades K-2, criteria used to identify K-2 students. If preschool services are provided, criteria used to identify the Title I preschool students.
- Ranking the eligible students most in need of academic assistance to meet the challenging state academic standards. *Note: please do not include student-level data.*
- Exiting students from Title I services for one school in each grade span in the LEA (elementary, middle, high) that has a targeted assistance program.

## 7.1. Guiding Questions

1. How is the Title I program reviewed and revised to ensure the students most at risk of failing are served? How often is this review conducted?
2. What special populations, if any (i.e., homeless, neglected, and delinquent), were found eligible and served in schools that did not receive Title I funding?

## 7.1. Rubric

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<b>Beginning</b>	The LEA does not provide evidence for one or more of the following criteria: <ul style="list-style-type: none"><li>• Determining eligible students and their academic needs;</li><li>• Ranking students most in need of services (including K-2 and preschool students, if applicable); and</li><li>• Exiting students from Title I services.</li></ul>
<b>Beginning</b>	The LEA provides evidence that includes personally identifiable information (PII).
<b>Developing</b>	The LEA provides evidence of the following criteria for: <ul style="list-style-type: none"><li>• Determining eligible students and their academic needs;</li><li>• Ranking students most in need of services (including K-2 and preschool students, if applicable); and</li><li>• Exiting students from Title I services.</li></ul> <p>The LEA does not regularly review the program to ensure the students most at risk of failing are served.</p>
<b>Accomplished</b>	The LEA provides evidence of the following criteria for: <ul style="list-style-type: none"><li>• Determining eligible students and their academic needs;</li><li>• Ranking students most in need of services (including K-2 and preschool students, if applicable); and</li><li>• Exiting students from Title I services.</li></ul> <p>The LEA regularly reviews the program to ensure the students most at risk of failing are served.</p>

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## Requirement 7.2. Services in Targeted Assistance Schools

Schools implementing Title I targeted assistance programs shall:

- use resources necessary to provide a well-rounded education,
- use methods and instructional strategies to strengthen the academic program of the school,
- coordinate with and support the regular education program, and
- provide LEA assurances that the school will help provide an accelerated, high-quality curriculum; minimize the removal of children from the regular classroom; and on an ongoing basis, revise the targeted assistance program, if necessary, to provide additional assistance to enable the children to meet the challenging state academic standards.

*Section 1115(b)(2)(A-C) and (G)*

## 7.2. Required Documentation

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit.

## 7.2. Guiding Questions

Please have a school-level representative available (in person or via telephone) to assist in responding to the guiding questions.

1. Describe the methods and instructional strategies used to support students receiving Title I services.
2. How does the school determine if the methods and instructional strategies have been successful?
3. If applicable, give an example of a time when these strategies did not work for a student/students and modification was required. What was the outcome?
4. How are Title I services provided to ensure that students are not removed from the classroom during core instruction (e.g. pull-out, push-in, extended day, etc.)?
5. Describe the process for reviewing student progress to ensure that instructional methods and strategies match student needs.
6. What are some examples of improved teaching and learning practices as a result of the evaluation process?

## 7.2. Rubric

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<b>Beginning</b>	The LEA does not provide examples of successful methods, instructional strategies, and/or a process for reviewing student progress is not provided.
<b>Developing</b>	The LEA provides examples of successful methods, instructional strategies, and a process for reviewing student progress.  The LEA provides limited evidence of systemic implementation of identified successful strategies and/or a regular process to review student progress to ensure that instructional methods and strategies match student needs.
<b>Accomplished</b>	The LEA provides examples of successful methods, instructional strategies, and a process for reviewing student progress.  There is clear evidence of systemic implementation of identified successful strategies and a regular process to review student progress to ensure that instructional methods and strategies match student needs.
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND provides evidence that their practices resulted in increased achievement of students receiving Title I services.

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# Section 8 - Family Engagement in Title I Schools

## Resource

- DPI’s Title I and Family Engagement webpage: <https://dpi.wi.gov/title-i/family-engagement>. This webpage provides many samples and templates to support LEA’s compliance with this section.

## Requirement 8.1. Family Engagement Policy

Each LEA and school that receives Title I, Part A funds shall develop jointly with, agree on with, and distribute to parents and family members of participating children a written parent and family engagement policy. *Section 1116(a)(2) and (b)*

### 8.1. Required Documentation

Either:

- The LEA policy that applies to all parents and family members in all schools and meets the requirements of ESSA. In a one-school LEA, this is one and the same.

OR

- The LEA parent and family engagement policy and individual Title I school policy (from at least one Title I school) that meet the requirements of ESSA.

### 8.1. Guiding Questions

There are no questions for this requirement.

### 8.1. Rubric

<b>Beginning</b>	The LEA does not have a parent and family engagement policy.
<b>Accomplished</b>	The LEA policy applies to all parents and family members in all schools and meets the requirements of ESSA. In a one-school LEA, this is one and the same.
<b>Accomplished</b>	The LEA parent and family engagement policy and individual Title I school policy (from at least one Title I school) meet the requirements of ESSA.

## Requirement 8.2. Engaging Families in the Development, Evaluation, and Review of the Title I Programs

Each Title I School shall involve parents, in an organized, ongoing and timely way, in the planning, review, and improvement of Title I programs (targeted assistance and schoolwide programs),

*Section 1116(c)(3)*

## 8.2. Required Documentation

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit.

## 8.2. Guiding Questions

1. What strategies are used to engage families in developing the plan, conducting the evaluation, and revising the schoolwide plan(s) and/or targeted assistance programs?
2. What strategies are used to ensure that all families, including those of students who are historically or currently marginalized (i.e. English learners, students with disabilities, etc.) are included in the development, evaluation, and review of the Title I program plans?
3. How has your LEA adjusted Title I services based on input and feedback from families?

## 8.2. Rubric

<b>Beginning</b>	The school(s) does not include families when developing, evaluating, or revising Title I programming.
<b>Developing</b>	Few families are present, and engagement is active or passive based on level of interest.
<b>Developing</b>	Engaged families include representation of the Title I students (all students in a schoolwide program and eligible students in a targeted assistance program), including families of students who have been historically/are currently marginalized, BUT families are only allowed to give feedback on plans, rather than participate in the development of the plan(s).
<b>Accomplished</b>	Engaged families include representation of the Title I students (all students in a schoolwide program and eligible students in a targeted assistance program), including families of students who have been historically/are currently marginalized.  Families participate in developing, evaluating, and revising Title I programming AND families are present and engaged by asking thoughtful questions and responding to comments.
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND has evidence that family engagement has improved Title I services, resulting in positive student outcomes.

## Requirement 8.3. Staff Capacity Building

The LEA shall educate teachers, specialized instructional support personnel, principals, and other school leaders and staff, with the assistance of parents, in the value and utility of parent contributions, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and their school.

*Section 1116(e)(3)*

## 8.3. Required Documentation

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit.

### 8.3. Guiding Questions

1. What professional learning is available to help staff understand the value of family engagement in student learning and effective outreach strategies?
2. What strategies are used to ensure that the information, materials, and capacity building opportunities are provided to all parents, including parents of students who are historically or currently marginalized (i.e. English learners, students with disabilities, etc.) in a language the family can understand?
3. Describe how your LEA engages parents and family members to help train staff, train other parents, or serve on a district parent/family advisory council.

### 8.3. Rubric

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<b>Beginning</b>	The LEA does not provide evidence of professional learning for school staff on parent involvement and outreach strategies.
<b>Developing</b>	The LEA provides evidence of professional learning for school staff on parent involvement and outreach strategies, BUT does not provide professional learning on effective outreach strategies for parents of students who are historically or currently marginalized (i.e. English learners, students with disabilities, etc.).  The LEA may or may not provide evidence that parents are involved in the development of professional learning.
<b>Developing</b>	The LEA provides evidence of professional learning for school staff on parent involvement and effective outreach strategies for parents of students who are historically or currently marginalized (i.e. English learners, students with disabilities, etc.), BUT does not provide evidence that parents are involved in the development of professional learning.
<b>Accomplished</b>	The LEA provides evidence of professional learning for school staff on parent involvement and effective outreach strategies for parents of students who are historically or currently marginalized (i.e. English learners, students with disabilities, etc.).  The LEA also provides evidence that parents are involved in the development of professional learning.
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category, AND the LEA shares student and parent/family survey or other data demonstrating all parents are involved in supporting student learning, resulting in increased student achievement.

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# Section 9 - Coordination with Early Childhood Development Programs

## Requirement 9.1. Agreement

An LEA receiving Title I, Part A shall carry out required activities with Head Start agencies and, if feasible, other entities carrying out early childhood development programs. Required activities include:

- developing and implementing a systematic procedure for transferring records;
- establishing channels of communication to coordinate programs;
- conducting meetings with parents and teachers from both entities to discuss the developmental and other needs of individual children;
- organizing and participating in joint professional development; and
- linking the educational services provided by the LEA with Head Start.

Section 1119

## Resource

- DPI's webpage regarding Early Childhood requirements:  
<https://dpi.wi.gov/title-i/early-childhood-requirements>

## 9.1. Required Documentation

An agreement with the local Head Start agency to carry out the required activities. (If there is no Head Start agency in the LEA's boundaries, then this is not applicable.)

If applicable and feasible, agreements with other early childhood development programs to carry out the required activities.

## 9.1. Guiding Questions

1. What transition strategies has your LEA found successful?
2. What measures are used to monitor success?
3. What strategies are used to coordinate family engagement efforts with other programs in the community, including preschool programs and parent resource centers?
4. What are some examples of joint professional development implemented between the two agencies?

## 9.1. Rubric

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<b>Beginning</b>	The LEA does not meet one or more criteria in the "Accomplished" category.
<b>Developing</b>	The LEA meets all of the criteria in the "Accomplished" category, BUT does not have a documented agreement across all their local Head Start agency(ies) or early childhood programs where feasible.

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**Accomplished** The LEA has developed an agreement with their local Head Start agency(ies) and other early childhood education programs where feasible, that include plans to implement all of the following:

- Systematic procedures to receive records for children who have transferred from a Head Start program or, where applicable, another early childhood education program.
- Channels of communication between school staff and their counterparts (including teachers, social workers, and health staff) in Head Start agencies or other entities carrying out early childhood programs, as appropriate, to facilitate coordination of programs. (Example: [CCSSO. New Early Childhood Coordination Requirements in the Every Student Succeeds Act. December 2017. Page 6: West Virginia Example](#))
- Meetings conducted with parents and teachers from both entities to discuss the developmental and other needs of individual children. Meetings should involve parents, kindergarten or elementary school teachers, and Head Start teachers or, if appropriate, teachers from other early childhood programs. (Example: [CCSSO. New Early Childhood Coordination Requirements in the Every Student Succeeds Act. December 2017. Page 6: Missouri Example](#))
- Joint professional development for the LEA, Head Start agencies, and other early childhood education program staff. Professional development includes joint transition-related training of school staff, Head Start program staff, and, where appropriate, other early childhood education program staff. (Example: [CCSSO. New Early Childhood Coordination Requirements in the Every Student Succeeds Act. December 2017. Page 7: Oregon Example](#))

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**Exemplar** The LEA meets the criteria listed in the “Accomplished” category AND demonstrates any of the following exemplary practices.

- The LEA engages diverse families and communities, particularly those representing historically marginalized/currently marginalized students, in developing and implementing the coordination agreements.
- The LEA has regular standing meetings with Head Start agencies and other early childhood education requirements, where feasible, to address concerns and continue improvements to the activities within the coordination agreements.

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# Section 10 - Coordination to Serve Eligible Students in Title I and Non-Title I Schools

## Requirement 10.1. Services for Students Experiencing Homelessness

LEAs will ensure that students experiencing homelessness in Title I schoolwide, targeted assistance, and non-Title I schools receive services to support their enrollment, attendance, and full access to education. *Section 1112(b)(6)*

### 10.1. Required Documentation

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit.

DPI consultants should review the Homeless reservation in the last approved Title I budget and questions 5.1-5.7 in the last approved LEA plan for background information before the visit.

### 10.1. Guiding Questions

1. How are the needs of students experiencing homelessness determined upon enrollment?
2. How is the homeless liaison involved in determining the Title I, Part A homeless reservation amount?
3. What data is used to determine the Title I, Part A homeless reservation? (Is there a needs assessment, program evaluation, etc.?)
4. What are the supplemental academic and support services provided to students experiencing homelessness in Title I and non-Title I schools? What are examples of successful academic services provided to these students?
5. Describe the process used to ensure adequate financial resources are made available to serve students experiencing homelessness in all schools. What collaboration exists to ensure this?

### 10.1. Rubric

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<b>Beginning</b>	The LEA does not have a procedure to identify the needs of students experiencing homelessness
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<b>Beginning</b>	The LEA has a procedure to identify the academic and support needs of students experiencing homelessness, BUT any of the following are evident: <ul style="list-style-type: none"><li>● It is not being implemented across all school buildings;</li><li>● The LEA cannot describe the supplemental academic or support services provided to students experiencing homelessness in all schools; and/or</li><li>● It does not have a process to ensure adequate financial resources are available to support students experiencing homelessness in all schools.</li></ul>
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<b>Developing</b>	<p>The LEA has a procedure to identify academic and support needs of students experiencing homelessness, AND describes the supplemental academic or support services provided to students experiencing homelessness in all schools, BUT the LEA provides little evidence:</p> <ul style="list-style-type: none"> <li>• That the procedure is being implemented across all school buildings in the LEA; and/or</li> <li>• Of collaboration for funding academic and support services for students experiencing homelessness.</li> <li>• That the LEA does not involve the homeless liaison in determining the TI-A homeless reservation.</li> </ul>
<b>Accomplished</b>	<p>The LEA has a procedure to identify academic and support needs of students experiencing homelessness across all school buildings in the LEA, AND</p> <ul style="list-style-type: none"> <li>• Describes how the procedure is implemented across all school buildings in the LEA;</li> <li>• Describes how the homeless liaison is involved in determining the TI-A homeless reservation;</li> <li>• Describes the process to ensure financial resources are available to serve students in all schools; AND</li> <li>• There is evidence of collaboration for funding academic and support services for students experiencing homelessness.</li> </ul>
<b>Exemplar</b>	<p>The LEA meets the criteria in the “Accomplished” category, AND provides evidence:</p> <ul style="list-style-type: none"> <li>• that the implementation of their procedures leads to improved academic success for students experiencing homelessness</li> <li>• uses a comprehensive needs assessment to determine the TI-A homeless reservation.</li> </ul>

## Requirement 10.2 Services for Migratory Children

The LEA shall provide eligible migratory children (certified for eligibility by the state’s Migrant Education Program (MEP) staff) services under Title I, Part A on the same basis as other children.

Section 1112(c)(1)

*This requirement is only applicable to LEAs who have students identified as migratory students.*

### Resources

- DPI’s webpage for district services for migratory students: <https://dpi.wi.gov/migrant/districtservices>

### 10.2. Required Documentation

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit.

DPI consultants will ask MEP program consultants if the LEA has migratory students identified.

### 10.2. Guiding Questions

1. What academic and support services are provided to migratory students? How are those services provided?
2. What process or procedures are used to facilitate student transition and timely transfer of student records to other states, including enrollment and credit accrual records?

## 10.2. Rubric

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<b>Beginning</b>	The LEA excludes migratory children from Title I services because the students received or will receive supplement migrant education program services during the summer.
<b>Developing</b>	The LEA provides Title I services to migratory students, BUT is unable to articulate how they facilitate students' transitions from LEA to LEA.
<b>Accomplished</b>	The LEA provides Title I services to migratory students and articulates how they facilitate students' transitions from LEA to LEA.
<b>Exemplar</b>	The LEA meets the criteria in the "Accomplished" category, AND provides evidence that shows the implementation leads to improved academic success for migratory students.

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## Requirement 10.3. Serving Students Who Reside in Local Neglected Institutions

LEAs must ensure that students in local institutions for neglected children (within the boundaries of the LEA) receive services comparable to services for students in Title I schools.

*Section 1113 (c)(3)(A)*

*This requirement only applies to LEAs that have institutions for neglected students within the boundaries of the LEA and complete the DPI Neglected Annual Count form.*

## 10.3. Required Documentation

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit.

DPI consultants should review the Neglected reservation in the last approved Title I budget and question number 4.3 in the Title I-A Application LEA Plan for background information.

## 10.3. Guiding Questions

1. How are the needs of students in neglected institutions determined?
2. What are the supplemental academic and support services provided to students in neglected institutions? What are examples of successful academic services provided to these students?
3. What other funding sources support services to students in neglected institutions?

## 10.3. Rubric

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<b>Beginning</b>	The LEA does not provide any of the following: <ul style="list-style-type: none"><li>● A process to identify academic and support needs of students in local neglected institutions;</li><li>● A description of the supplemental academic or support services provided to students in neglected institutions; and/or</li><li>● A process to determine the Title I, Part A Neglected reservation.</li></ul>
<b>Developing</b>	The LEA has a procedure to identify academic and support needs of students in local neglected institutions AND describes the supplemental academic or support services provided to students in local neglected institutions.

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The LEA provides little evidence that the procedure is being implemented AND/OR little evidence of collaboration to determine the Title I, Part A Neglected reservation between the LEA and the institution.

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**Accomplished** The LEA has a procedure to identify academic and support needs of students in local neglected institutions and describes how the procedure is implemented.  
The LEA provides a list of services, including the funding sources to support services.  
There is evidence of collaboration to determine the Title I, Part A Neglected reservation between the LEA and the institution(s).

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**Exemplar** The LEA meets the criteria in the “Accomplished” category, AND provides evidence that the implementation of their procedures leads to improved academic success for students in neglected institutions.

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# Section 11 - Out-of-Home Care (Foster Care)

## Requirement 11.1. Transportation Procedures for Students in Out-of-Home Care

The LEA, in collaboration with the child welfare agency (CWA), has developed and implemented clear written procedures which include how transportation is provided, arranged, and funded for the duration of time a student is in out-of-home care.

Section 1112(c)(5)

### 11.1. Required Documentation

Written procedures governing transportation for students in out-of-home care.

### Resources

- Hyperlink to DPI's webpage regarding out-of-home care requirements: <https://dpi.wi.gov/foster-care>
- Hyperlink to DPI's webpage for procedures, guidance and templates: <https://dpi.wi.gov/foster-care/transportation-procedures>
- MMSD and Dane County Dept of Human Services Collaborative Agreement Implementing the Foster Care Provisions Under Title I of the ESSA; <https://drive.google.com/file/d/14d4k-siVawqzld4a4xrDRhcUq1UI9HA/view>

### 11.1. Guiding Questions

1. How do the procedures ensure that transportation is provided, arranged, and funded for students in out-of-home care?
2. What system is in place to ensure the procedures are followed so that transportation to the school of origin will begin immediately?
3. What are the written processes, policies, or procedures that ensure a student remains in the school of origin unless, in collaboration with the CWA, it is determined that it is not in the student's best interest?

*[Note: While ESSA does not require that there be written procedures or policies for conducting a best interest determination, it is required that, if a change in school is being considered, a determination is made, in collaboration with the child welfare agency, before a student is enrolled in the resident school. See DPI's [web page regarding the best interest determination](#) for more information.]*

### 11.1. Rubric

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<b>Beginning</b>	The LEA does not meet one or more criteria in the "Accomplished" category.  Even if the LEA states they do not have (or have never had) a student placed in out-of-home care within their LEA they are to have these requirements fully implemented prior to a student necessitating such a policy or procedure.
<b>Developing</b>	The LEA provides a policy or written procedures that meets the criteria in the "Accomplished" category, BUT there are delays in providing transportation to the school of origin or transportation is not being provided.

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<b>Accomplished</b>	<p>The LEA provides a policy or written procedures they developed with at least one local Child Welfare Agency (county human services agency/child protective services agency). The procedures include:</p> <ul style="list-style-type: none"> <li>• Information on how transportation to the school of origin for students placed in out-of-home care is provided, arranged, and funded;</li> <li>• An effective timeline for ensuring immediate transportation to the school of origin. This can be provided through deadlines, timelines, or an assurance the transportation will be prompt/immediate; AND</li> <li>• Information on how the district will fund the transportation above the costs the LEA would provide normally to transport the student (additional costs). Note: The law allows for the local agencies to determine how those additional costs will be covered (whether by the LEA, the child welfare agency, or both in a shared agreement).</li> </ul> <p>AND the LEA provides evidence that procedures are being implemented with fidelity.</p>
<b>Exemplar</b>	<p>The LEA meets the criteria in the “Accomplished” category, AND the procedures mention or emphasize continuous collaboration with the child welfare agency to update and improve the procedures (example: Milwaukee Public Schools and Division of Milwaukee Child Protective Services meet quarterly specifically on educational stability for students in out-of-home care).</p> <p>AND/OR, the LEA has regular standing meetings with the CWA to address concerns, discuss specific cases, and continue program and protocol improvements.</p>

## Requirement 11.2. Enrollment Procedures for Students in Out-of-Home Care

When a determination is made for a student in out-of-home care that it is not in their best interest to remain in the school of origin, the LEA of the new school will immediately enroll the student, even if the student is unable to produce records normally required for enrollment. The LEA will immediately contact the last school the student attended to obtain relevant academic and other records.

*Section 1111(g)(1)(E)*

### Resources

- Hyperlink to DPI’s webpage regarding out-of-home care requirements: <https://dpi.wi.gov/foster-care>
- MMSD and Dane County Dept of Human Services Collaborative Agreement Implementing the Foster Care Provisions Under Title I of the ESSA: <https://drive.google.com/file/d/14d4k-siVawqzld4a4xrDRhcUq1UI9HA/view>
- MPS Out-of-Home Care Procedures (In-District): <https://drive.google.com/file/d/1oPTqeOCk5gP2rsriGMHIKNAK8ddiTH9B/view>
- Kimberly Area School District McKinney-Vento Homeless Program Guidelines and Procedures (this example is for the McKinney-Vento Program but has similar language in the enrollment procedures). <https://drive.google.com/file/d/1I7XITw6k99ih1mgdtXUifWMKML5ISGba/view>

### 11.2. Required Documentation

Written processes, procedures, and/or policies that ensure

- the immediate enrollment of students in out-of-home care, and
- The immediate contact of the school last attended to obtain relevant academic and other records.

## 11.2. Guiding Questions

1. How do the procedures ensure that the student will be immediately enrolled, even if the student is unable to produce records normally required for enrollment?
2. Describe the processes, procedures, and/or policies to obtain relevant academic and other records.

## 11.2. Rubric

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<b>Beginning</b>	<p>The LEA does not meet all of the criteria in the “Accomplished” Category.</p> <p>Even if the LEA states they do not have (or have never had) a student placed in out-of-home care within their district they are to have these requirements fully implemented prior to a student necessitating such a policy or procedure.</p>
<b>Developing</b>	<p>The LEA has a written process, procedure, or policy that meets the criteria in the “Accomplished” category BUT there are delays in enrolling students who have been placed in out-of-home care, or records are not being requested immediately.</p>
<b>Accomplished</b>	<p>The LEA has a written process, procedure, or policy that describes how the LEA ensures the immediate enrollment of students placed in out-of-home care once a best interest determination is made. AND, such immediate enrollment procedures apply even if the student is unable to produce records normally required for enrollment.</p> <p>The LEA has written processes, procedures, and/or policies that ensure the immediate contact of the school last attended to obtain relevant academic and other records of students placed in out-of-home care.</p> <p>AND the LEA provides evidence that the written process, procedures, or policy are being implemented with fidelity.</p>
<b>Exemplar</b>	<p>The LEA meets the criteria in the “Accomplished” category, AND,</p> <ul style="list-style-type: none"><li>• The LEA’s process, procedure or policy emphasizes credit recovery and retention strategies for high school students that are placed in out-of-home care, in order to ensure they graduate on time, college and career ready.</li><li>• The LEA’s process, procedure, or policy on immediate enrollment ensures that student voice (when appropriate) is taken into consideration during enrollment in courses and programming.</li><li>• The LEA’s process, procedure, or policy on requesting a transfer of records ensures time and space to plan (and when appropriate with the student) for coordinating supports to meet the student’s needs.</li></ul>

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## Section 12 - Schools Identified for Targeted Supports and Improvement (TSI) or Additional Targeted Supports and Improvement (ATSI)

### Requirement 12.1. School Improvement Plan

LEAs are responsible to support schools identified for targeted support and improvement (TSI) and/or schools identified for additional targeted support and improvement (ATSI). Each school is responsible for partnering with [stakeholders](#) to develop and implement a school improvement plan to improve student outcomes. This plan and the schoolwide plan may be one in the same. The LEA must approve and monitor these school improvement plans.

Each school improvement plan must:

- be informed by student performance indicators, including performance when measured against state long-term goals;
- include evidence-based intervention improvement strategies;
- identify and address resource inequities (required for schools identified ATSI, recommended for schools identified as TSI);
- involve stakeholders in planning;
- be approved by the LEA prior to implementation;
- be monitored by the LEA; and
- result in additional action following unsuccessful implementation of such a plan after a number of years determined by the LEA.

*Section 1111(d)(2)*

### Resource(s)

- Hyperlink to DPI's webpage on continuous improvement: <https://dpi.wi.gov/continuous-improvement>
- Hyperlink to DPI's [Continuous Improvement Process Criteria and Rubric](#) which connects federal requirements to specific components within DPI's framework for continuous improvement and provides a detailed description of "accomplished" and "exemplary" characteristics used for monitoring and review (look for the key on page 6):  
[https://dpi.wi.gov/sites/default/files/imce/continuous-improvement/pdf/CIP\\_rubric\\_draft.pdf](https://dpi.wi.gov/sites/default/files/imce/continuous-improvement/pdf/CIP_rubric_draft.pdf)

### 12.1. Required Documentation

A copy of the approved school improvement plan for each school identified for TSI/ATSI, including the date when the plan was approved. This plan and the schoolwide plan may be one in the same.

WISEgrants lists the school(s) within the LEA that have been identified for TSI/ATSI. To see the list of schools, log into WISEgrants. In the blue menu bar, click the following: Programs > Continuous Improvement Performance Report (CIPR) > Continuous Improvement Performance Report Data. This screen will list the ESSA school level identifications as well as IDEA LEA level identifications, if applicable. Note: DPI has separate procedures for monitoring LEA's IDEA identifications and/or LEAs with schools' identifications for comprehensive support and improvements (CSI) under ESSA.



## 12.1. Guiding Questions

1. Describe the process to support and monitor the development and implementation of the school improvement plan.
2. What systems are in place to support identified schools in the following:
  - a. partnering with stakeholders to develop and implement an improvement plan to improve student outcomes;
  - b. holistically analyzing data, including student performance and engagement data, as well as qualitative measures; and
  - c. implementing evidence-based improvement strategies?
3. What systems are in place to prioritize support and funding for identified schools, particularly Title II funds, as described in the LEA Plan, Question #11?
  - a. How does your LEA monitor for effective use of those funds for improving student outcomes in identified schools?
4. What systems are in place to analyze and address the identified resource inequities in schools identified for ATSI?
5. If utilizing Title I and Title II funds for rewards and incentives in schools identified as TSI/ATSI, how does your LEA monitor for effective use of those funds for recruiting and retaining effective staff?
6. For any ATSI schools, what district-level systems of support and continuous improvement are in place to ensure improved achievement for the identified student groups?
7. What are some examples of improved teaching and learning practices as a result of the continuous improvement process?

## 12.1. Rubric

<b>Beginning</b>	<p>The LEA does not provide a copy of the approved plan for each identified school or the LEA provides a copy of the plan for each identified school but the plan(s) do not include the required components.</p> <p>AND/OR, the LEA does not describe the process to support and monitor implementation of the plans in ATSI schools.</p>
<b>Developing</b>	<p>The LEA provides documentation of the approved plan including required components, BUT does not articulate the process for development and implementation of the plan.</p> <p>The LEA does not provide evidence that the school is receiving specific supports and/or if the LEA is monitoring the plan's implementation with fidelity.</p>
<b>Accomplished</b>	<p>The LEA provides documentation of the approved plan including required components, as well as a process for development and implementation of the plan.</p> <p>The LEA provides evidence that the school is receiving specific supports from the LEA and the LEA is monitoring the school to ensure the plan is implemented with fidelity.</p>
<b>Exemplar</b>	<p>The LEA meets the criteria in the "Accomplished" category, AND provides evidence that the plan is resulting in positive trends for student outcomes.</p>

# Section 13 - Title I Fiduciary Requirements

## Requirement 13.1. Comparability

The LEA may receive Title I funds if *state and local funds* will be used in schools served with Title funds that, taken as a whole, are at least comparable to services in schools that are not receiving Title I funds. OR, if the LEA is serving all of its schools with Title I funds that, taken as a whole, are at least comparable in each school. *Section 1118(c)*

*This section is not required for LEAs who are exempt from the Title I Comparability requirement. WISEgrants will identify those LEAs exempt from this requirement.*

### Resources

- DPI’s webpage regarding Title I Comparability: <https://dpi.wi.gov/title-i/fiscal-information#ComparabilityReporting>

### 13.1.a. Required Documentation - Policy

Policy to ensure equivalence among schools in teachers, administrators, and other staff and equivalence among schools in the provision of curriculum materials and instructional supplies.

### 13.1.a. Guiding Questions

1. Describe the process used to ensure that *state and local funds* are distributed without taking a school’s Title I status into account.
2. Describe the process used to ensure Title I funds are used to support students identified with the greatest need. What data is used for this process?

### 13.1.a. Rubric

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<b>Not Applicable</b>	The LEA is exempt from the Title I Comparability requirement.
<b>Beginning</b>	The LEA does not provide a policy or it does not address one or more of the following: <ul style="list-style-type: none"><li>• All grade spans/school tiers receiving Title I, Part A;</li><li>• Equivalence among staff; or</li><li>• Equivalence in the provision of curriculum.</li></ul>
<b>Beginning</b>	The LEA provides a policy that allows for fewer state/local resources to be distributed to schools receiving Title I funds.
<b>Developing</b>	The LEA provides a policy that addresses all Title I receiving grade spans/school tiers, ensures a school’s Title I status is not taken into account when distributing state/local funds, BUT the LEA could not articulate how they use data to support decisions regarding Title I funding.

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<b>Accomplished</b>	The LEA articulates how they used data to support Title I funding decisions and provides a comparability policy that applies to all grade spans/school tiers; demonstrates that a school's Title I status is not taken into consideration when distributing <i>state/local funds</i> ; AND both of the following: <ul style="list-style-type: none"> <li>• The equivalence among staff and</li> <li>• The equivalence in the provision of curriculum.</li> </ul>
<b>Exemplar</b>	The LEA meets the criteria in the "Accomplished" category AND provides supporting data that demonstrates implementation of the LEA's equivalence policy, OR provides a public statement (i.e. on a website) that addresses how equivalence is maintained in its schools.

### 13.1.b. Required Documentation - Salary Schedule

The LEA's salary schedule (for all schools). *Note: School districts should provide the salary schedule they are required to have on file per Wis. Statute § [119.40](#).*

#### 13.1.b. Guiding Questions

There are no guiding questions for this section.

#### 13.1.b. Rubric

<b>Not Applicable</b>	The LEA is exempt from the Title I Comparability requirement.
<b>Beginning</b>	The LEA does not provide a salary schedule.
<b>Beginning</b>	The LEA provides a salary schedule, but it is not applicable to all schools.
<b>Accomplished</b>	The LEA submits a salary schedule that is complete and includes information for all schools.

### 13.1.c. Required Documentation - Supporting Documentation

Documentation used to support the data submitted in the Title I Comparability Report in WISEgrants.

#### 13.1.c. Guiding Questions

There are no guiding questions for this section.

#### 13.1.c. Rubric

<b>Not Applicable</b>	The LEA is exempt from the Title I Comparability requirement.
<b>Beginning</b>	The LEA does not provide documentation that aligns with the data submitted in the Title I Comparability Report in WISEgrants.
<b>Accomplished</b>	The LEA provides internal school-level allotment documentation that aligns with the data submitted in the Title I Comparability report.

## **Requirement 13.2. Title I Supplement, not Supplant**

The LEA must use Title I funds to supplement the amount of funds that would, in the absence of these federal funds, be made available from state and local sources for the school. In other words, Title I funds may not be used to supplant (take the place of) state and local funds.

The LEA shall demonstrate that the methodology used to allocate **state and local funds** to each school receiving Title I, Part A funds ensures that such school receives all of the **state and local funds** it would otherwise receive if it were not receiving Title I, Part A funds.

*Section 1118(b)(2)*

*Note: ESSA no longer requires any determination that individual costs are supplemental.*

An LEA is exempt from this requirement if it has:

- one school;
- only Title I schools; or
- a grade span that contains only: a single school, non-Title I schools, or Title I schools (i.e., no methodology is required for this grade span).

*Source: Supplement not Supplant Under Title I, Part A, Non-Regulatory Informational Document, United State Department of Education, June 2019.*

### **Resources**

- DPI's webpage regarding Title I Supplement, not Supplant:  
[https://dpi.wi.gov/title-i/fiscal-information#Supplement Not Supplant](https://dpi.wi.gov/title-i/fiscal-information#Supplement%20Not%20Supplant)

### **13.2. Required Documentation**

The methodology used to allocate **state and local funds**, ensuring that schools receiving Title I, Part A received all of the **state and local funds** they would otherwise receive if they were not Title I schools. An LEA's methodology must:

- demonstrate that Title I schools received all **state and local funds** for which they are entitled;
- be "Title I neutral" (i.e. does not take a school's Title I status into consideration); and
- be documented.

### **13.2. Guiding Questions**

1. How does the methodology meet the needs of the most vulnerable students?
2. Describe the process to ensure the methodology is culturally responsive and relevant to the needs of the students.
3. Describe the data used or factors taken into consideration to determine the methodology (e.g., school achievement data, school poverty data, data on resource inequities, etc.).

## 13.2. Rubric

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<b>Not Applicable</b>	The LEA is exempt from this requirement.
<b>Beginning</b>	The LEA is not exempt from this requirement, BUT did not submit a methodology.
<b>Beginning</b>	The LEA provides a methodology that is not Title I neutral. In other words, the methodology includes a school's Title I status as a factor in determining the amount of state and local funds each school receives.
<b>Beginning</b>	The LEA provides a methodology that does not demonstrate Title I schools received all the <a href="#">state and local funds</a> for which they are entitled.
<b>Developing</b>	The LEA provides a methodology that demonstrates that Title I schools receive all <a href="#">state and local funds</a> for which they are entitled and is "Title I neutral", BUT the LEA does not use data or assess its resource inequities in order to adjust the methodology (as necessary) to ensure that it is culturally responsive and relevant to the needs of students.
<b>Accomplished</b>	<p>The LEA provides a methodology that demonstrates that Title I schools receive all <a href="#">state and local funds</a> for which they are entitled and is "Title I neutral."</p> <p>Additionally, the LEA uses data and/or assesses its resource inequities in order to adjust the methodology (as necessary) to ensure that it is culturally responsive and relevant to the needs of students.</p>
<b>Exemplar</b>	The LEA meets the criteria in the "Accomplished" category AND has written procedures on how the methodology will be reviewed and revised annually.
<b>Exemplar</b>	The LEA meets the criteria in the "Accomplished" category AND has examples of how their methodology has contributed to improved student achievement.

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# Title II, Part A Requirements

## Purpose of Title II, Part A

The purpose of Title II, Part A is to increase student achievement through strategies, such as improving teacher and principal quality and increasing the number of effective teachers and leaders in the districts.

*Note: The following Title II requirements will be discussed in the ESEA Consolidated Section - Section 3 - Professional Development.*

- *LEAs shall use Title II funds to address the learning needs of all students, including children with disabilities, English learners, and gifted and talented students (Section 2103 (b)(2)).*
- *LEAs shall ensure activities are aligned with college- and career-ready standards (Section 2102(b)(2)(A)).*
- *LEAs shall ensure activities are evidence-based strategies that are sustainable, measurable, and have a positive impact on student achievement in a well-rounded education (Section 8101(42)).*

## Section 14 - Equitable Distribution of Teachers

### Requirement 14.1. Equitable Distribution of Teachers Plan

Every LEA receiving Title I, Part A funds shall analyze school-level data to see if low-income students, English learners, and students of color are being taught at disproportionate rates by ineffective, inexperienced, or out-of-field teachers, and if so, create a plan for how they will eliminate those gaps.

- **Inexperienced:** a teacher that has been teaching in a licensure area for three years or less.
- **Out-of-Field:** a teacher that is teaching on an emergency license/permit.
- **Ineffective:** a teacher that does not meet the Wisconsin teaching standards. LEAs are encouraged to use local data to help further determine ineffective teachers.

*Sections 1111(g)(1)(B)*

#### 14.1. Required Documentation

A plan for the equitable distribution of teachers and leaders to ensure that low-income students, English learners, and students of color are not being taught at disproportionate rates by ineffective, inexperienced, or out-of-field teachers.

#### 14.1. Guiding Questions

1. Describe the process used to monitor the achievement gap identified in the plan for equitable distribution of teachers and leaders to address the socioeconomic, race/ethnicity, special education, and English learner student needs.
2. How does the impact on teacher/principal/other school leaders' mobility rates compare to other schools within the district?

3. Describe the process used to identify the teachers and principals having the greatest success improving student achievement and closing student achievement gaps.
4. Describe the process used to ensure all Title II, Part A funds target schools with the highest proportion of ineffective teachers or principals, or with the largest proportion of students who do not meet the college- and career-ready standards and/or the Wisconsin Academic Standards.

## 14.1. Rubric

<b>Beginning</b>	The LEA does not have a plan for equitable teacher distribution or the plan is outdated.
<b>Developing</b>	The LEA provides a plan for equitable distribution of teachers and leaders that is updated regularly; reflects new teacher growth strategies; and addresses the needs of all disadvantaged students. The LEA articulates how the equity plan is developed/ implemented, BUT the teacher/principal/other school leaders' mobility rates from the district are relatively too high compared to similar districts and/or during recent years.
<b>Developing</b>	The LEA provides a plan for equitable distribution of teachers and leaders; the plan is updated regularly and addresses the needs of all disadvantaged students.  The LEA could not articulate how the equity plan was implemented.
<b>Accomplished</b>	The LEA provides a plan for equitable distribution of teachers and leaders that is updated regularly and addresses the needs of all disadvantaged students.  The LEA articulates how the equity plan is implemented.
<b>Exemplar</b>	The LEA meets the criteria in the "Accomplished" Category AND the plan shows positive and promising results.

# Section 15 - Recruitment and Retention

## Requirement 15.1. Recruitment and Retention Plan(s)

The LEA shall have systems of professional growth and improvement, such as induction for teachers, principals, or other school leaders and opportunities for building the capacity of teachers and opportunities to develop meaningful leadership.

Section 2102(b)(2)(B)

### Resources

- DPI's webpage on coaching: <https://dpi.wi.gov/news/dpi-connected/when-you-say-coaching>
- Instructional Coaching Group website: <https://instructionalcoaching.com/resources/>
- Instructional Coaches toolkit: <https://resources.corwin.com/impactcycle/student-resources/instructional-coaches'-toolkit>

### 15.1.a. Required Documentation - Recruitment

Evidence that the LEA is offering resources, such as tuition reimbursement, release time, and test preparation to inexperienced teachers teaching with emergency or provisional credentials, and teachers who are not teaching in the subject or field for which the teacher is certified or licensed.

### 15.1.a. Guiding Questions

1. What services and resources are offered to teachers teaching with emergency or provisional credentials and teachers not teaching in the field or subject they are certified or licensed, to become effective teachers?
2. What services and resources are offered to inexperienced teachers to build their capacity to address the socioeconomic, race/ethnicity, special education and English learner student educational needs?

### 15.1.a. Rubric

<b>Beginning</b>	The LEA does not have evidence that it has resources for inexperienced teachers and/or teachers who are not teaching in the subject or field for which the teacher is certified or licensed.
<b>Developing</b>	The LEA provides inexperienced teachers resources, BUT it is at the teacher's request.
<b>Accomplished</b>	The LEA has a system in place to provide any the following resources to inexperienced teachers: <ul style="list-style-type: none"><li>• Mentoring and coaching by experience teachers;</li><li>• Tuition reimbursement; and</li><li>• Capacity building opportunities to address needs of historically and/or currently marginalized student groups (i.e. English learners, students with disabilities, etc.).</li></ul>
<b>Exemplar</b>	The LEA meets the criteria in the "Accomplished" Category AND has evidence that their system resulted in effective teachers.



### 15.1.b. Required Documentation - Retention

Documentation (timelines, meeting calendars or agendas, observation/rating schedules, and training schedules, etc.) demonstrating opportunities for educator advancement initiatives to promote professional growth. Documents may include any of the following:

- A recruitment/retention plan demonstrating a teacher mentorship program that is based on teacher rating, principal observations, and a principal coaching plan based on evidence-based strategies and will result in stronger instructional leaders.
- A professional development plan that includes both a teacher mentorship program and a principal coaching plan.

### 15.1.b. Guiding Questions

1. What resources are provided to principals and teachers to support identified areas needing growth?
2. What incentives or opportunities are provided to exemplary principals and teachers?
3. Describe the process used to ensure all new teachers receive mentoring.
4. Describe the process used to ensure those observing principal or teacher practice have an understanding of effective practices and levels of performance.
5. How does your LEA ensure those observing principal or teacher practice have the ability to lead or facilitate high quality coaching conversations based on identified levels of practice?

### 15.1.b. Rubric

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<b>Beginning</b>	The LEA does not provide evidence demonstrating opportunities for educator advancement initiatives to promote professional growth.
<b>Beginning</b>	The LEA provides evidence of educator advancement initiatives that: <ul style="list-style-type: none"><li>• Are simply based on self-reflection or is a simple performance evaluation and has no observation component or</li><li>• Does not align with most current research strategies.</li></ul>
<b>Developing</b>	The LEA provides documentation demonstrating opportunities for educator advancement initiatives to promote professional growth, BUT the LEA could not speak to the mentoring and coaching plans, or the mentoring and coaching plans lack cohesiveness.
<b>Accomplished</b>	The LEA provides evidence demonstrating opportunities for educator advancement initiatives to promote professional growth aligned with current resource strategies and include mentoring plan(s) based on observations and coaching.
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND has evidence of any of the following: <ul style="list-style-type: none"><li>• The mentoring and coaching plan used evidence-based strategies and practices that meet Tier 1/Tier 2 for teachers and principals respectively.</li><li>• The recruitment/retention plan had a significant impact on student achievement.</li><li>• The number of effective teachers increased.</li><li>• The retention practice was co-created by teachers, administrators, and the school board.</li><li>• The recruitment plan includes recruitment from historically black colleges.</li><li>• The LEA pays for the cost of credits that align with the district priorities (i.e. if the LEA needs a teacher with a 316 license, then the LEA would pay for the teacher to obtain their 316 licensure).</li></ul>

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# Section 16 - Teacher and Paraprofessional Qualifications

## Requirement 16.1. Teacher Qualifications

All teachers working in a program supported with Title I funds are appropriately licensed. This includes all teachers in a Title I schoolwide program and all teachers supporting a Title I targeted assistance program are appropriately licensed (regardless of how those teachers salaries are funded).

*Section 1111(g)(2)(J)*

### 16.1. Required Documentation

LEAs must still comply with this requirement, but documentation is not required for this requirement prior to the monitoring visit. This information is collected in WISEstaff.

### 16.1. Guiding Questions

1. Describe the process to ensure that all teachers in a Title I schoolwide program and all teachers supporting a Title I targeted assistance program are appropriately licensed (regardless of how those teachers salaries are funded).

*Note: Educators teaching English learners must hold an ESL or bi-lingual license pertaining to the appropriate subject matter and grade level.*

### 16.1. Rubric

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<b>Beginning</b>	The LEA has one or more teachers working in a Title I school implementing a schoolwide program who are not appropriately licensed.  The LEA has one or more teachers supporting a Title I targeted assistance program who are not appropriately licensed.
<b>Developing</b>	All teachers supporting programs for Title I students (whether in a schoolwide program or a targeted assistance program) are appropriately licensed, BUT the LEA does not have a system or process in place to ensure they continue to meet this requirement.
<b>Accomplished</b>	All teachers supporting programs for Title I students (whether in a schoolwide program or a targeted assistance program) are appropriately licensed and the LEA can articulate their process/system to ensure they continue to meet this requirement.
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND explains that their system to ensure the requirement is documented and reviewed annually.

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## Requirement 16.2. Paraprofessional Qualifications

LEAs shall have all instructional paraprofessionals in schools implementing a Title I schoolwide program (regardless of funding source) and all instructional Title I paraprofessionals funded by Title I in targeted assistance schools be certified by meeting the hiring requirements.

Section 1111(g)(2)(J)

### Resources

- DPI's webpage regarding paraprofessional requirements: <https://dpi.wi.gov/title-ii/paraprofessionals-hiring-requirements>
- DPI's Title I Paraprofessional Hiring Implementation Guide: <https://dpi.wi.gov/sites/default/files/imce/title-ii/ESSA-Title-I-Paraprofessional-Hiring-Implementation-Guide.pdf>
- DPI's YouTube video regarding paraprofessional hiring options: <https://youtu.be/XvoEDGwAonk>

### 16.2.a. Required Documentation- Procedures

Procedures used to ensure that all new hires for paraprofessionals meet the ESEA requirements prior to employment.

### 16.2.a. Guiding Questions

1. Describe the process used to ensure that all instructional paraprofessionals meet the ESEA requirements prior to employment.
2. What is the onboarding and ongoing professional development offered to instructional paraprofessionals in your LEA?

### 16.2.a. Rubric

<b>Beginning</b>	The LEA does not provide a plan to ensure that all Title I instructional paraprofessionals meet the hiring requirements.
<b>Beginning</b>	The document used to verify the hiring requirements is not aligned with the WI Title I Paraprofessional Hiring Implementation Guide: <a href="https://dpi.wi.gov/sites/default/files/imce/title-ii/ESSA-Title-I-Paraprofessional-Hiring-Implementation-Guide.pdf">https://dpi.wi.gov/sites/default/files/imce/title-ii/ESSA-Title-I-Paraprofessional-Hiring-Implementation-Guide.pdf</a>
<b>Developing</b>	The LEA provides a plan to ensure that all Title I instructional paraprofessionals meet the hiring requirements, BUT the LEA could not articulate the procedures used to recruit and hire paraprofessionals and/or verify the credentials of the paraprofessionals.
<b>Accomplished</b>	The LEA has procedures in place to ensure that all Title I instructional paraprofessionals meet the hiring requirements. The procedures align with the WI Title I Paraprofessional Hiring Implementation Guide: <a href="https://dpi.wi.gov/sites/default/files/imce/title-ii/ESSA-Title-I-Paraprofessional-Hiring-Implementation-Guide.pdf">https://dpi.wi.gov/sites/default/files/imce/title-ii/ESSA-Title-I-Paraprofessional-Hiring-Implementation-Guide.pdf</a>
<b>Exemplar</b>	The LEA ensures all instructional paraprofessionals meet the hiring requirements in anticipation of applying for schoolwide programs in the future.

## 16.2.b. Required Documentation - Roster

Roster listing all of the following:

- Names and credentials of all paraprofessionals working with Title I students;
- Assessment used to verify the hiring requirements of each paraprofessional; and
- Names of each paraprofessional's supervising teacher(s) in Title I schoolwide programs and Title I funded paraprofessionals in Title I targeted assistance programs.

## 16.2.b. Guiding Questions

There are no guiding questions for this requirement.

## 16.2.b. Rubric

<b>Beginning</b>	The LEA does not provide a list of the paraprofessionals and their credentials working in Title I programs or the list does not include the name of each paraprofessional's supervising teacher.
<b>Beginning</b>	The LEA employs staff that performs the duties of paraprofessionals, BUT they were not included in the roster and/or they do not meet the hiring requirements.
<b>Beginning</b>	The LEA provides evidence that all instruction paraprofessionals working with Title I students meet the hiring requirements, BUT the roster does not show the type of assessment used to verify they meet the hiring requirements.
<b>Beginning</b>	The LEA provides the roster of paraprofessionals who completed the requirements under No Child Left Behind (NCLB), BUT the documents to support the evidence are missing.
<b>Accomplished</b>	The LEA provides evidence that all instruction paraprofessionals working with Title I students meet the hiring requirements and the list includes the name of the supervising teacher for each paraprofessional.

# Title III, Part A Requirements

## Purpose of Title III, Part A

An LEA (or Consortia) shall use its Title III funds for providing professional development; providing and implementing effective activities and strategies that enhance or supplement language instruction education programs (LIEPs) for English learners (ELs); and parent, family, and community engagement activities.

*Note: The family engagement and professional development requirements for Title III, Part A are discussed in the ESEA Consolidated sections of this document.*

## Section 17 - Title III, Part A Activities

### Resource

- DPI's English Learner Policy Handbook: <https://dpi.wi.gov/english-learners/el-identification-and-placement>

### Requirement 17.1. Instruction

The LEA shall use Title III funds to increase the English language proficiency of ELs by providing effective language instruction educational programs (LIEPs) that meet the needs of ELs and demonstrate success in increasing English language proficiency **and** student academic achievement.

Activities and services supported by Title III shall supplement the LIEP(s) provided by the LEA in order to meet the requirements of Title VI of the Civil Rights Act of 1964 and the Equal Education Opportunities Act (EEOA).

*Sections 3115(c)(1) and 3115(g)*

### 17.1. Required Documentation

The most current and up-to-date LEA board-approved EL Plan.

### 17.1. Guiding Questions

1. If not specified in the documentation, what LIEP program model(s) is being implemented (i.e. bilingual, sheltered instruction, etc)?
2. Describe the process used to place students who are ELs in the appropriate LIEP program model.
3. How does your LEA ensure services for all ELs, including ELs with disabilities, are included in extra or co-curricular activities offered by the LEA (i.e., gifted and talented programs, sports or academic clubs, or any community clubs?)
4. How does your LEA ensure students are not kept in language instruction programs longer than necessary?
5. When there is no EL teacher, how do content teachers determine the language or content support that ELs need in order to meet the state academic standards?
6. How do your LEA ensure that all teachers are fluent in English or the language of instruction?

7. How does your LEA meet the needs of an EL whose parents have refused the LIEP services offered?
8. How does your LEA ensure the LIEP includes sufficient resources, including qualified ESL staff, time, and materials to effectively implement the chosen LIEP model(s)? For example, does the staff to student ratio for the LIEP compare to local policy for staff to student ratio for general education programs?

## 17.1. Rubric

<b>Beginning</b>	The LEA does not have an LIEP program or plan.
<b>Beginning</b>	The LEA meets the criteria in the “Accomplished” category, BUT the ESSA LEA plan questions 17, 18.1 and 18.2 do not reflect the LEA’s practices described in this process.
<b>Developing</b>	<p>The LEA implements the LIEP described in the ESSA LEA Plan and articulates some, BUT not all of the following:</p> <ul style="list-style-type: none"> <li>● Processes to ensure that students who are ELs are placed in the appropriate LIEP model or a plan is in place for ELs whose parents have refused any or all services;</li> <li>● Processes to ensure students are exited at appropriate times;</li> <li>● The LIEP model(s) addresses the language and academic needs of students who are ELs;</li> <li>● Students who are ELs are included in curricular and co-curricular activities;</li> <li>● Teachers are fluent in English or the language of instruction; and</li> <li>● The LIEP is appropriately staffed (comparable to the local policy for general education) and has other sufficient resources to meet the needs of the LIEP.</li> </ul>
<b>Accomplished</b>	<p>The LEA implements the LIEP described in the ESSA LEA Plan AND articulates all the of the following:</p> <ul style="list-style-type: none"> <li>● Processes to ensure that students who are ELs are placed in the appropriate LIEP model or a plan is in place for ELs whose parents have refused any or all services;</li> <li>● Processes to ensure students are exited at appropriate times;</li> <li>● The LIEP model(s) addresses the language and academic needs of the students who are ELs;</li> <li>● Students who are ELs are included in curricular and co-curricular activities;</li> <li>● Teachers are fluent in English or the language of instruction; and</li> <li>● The LIEP is appropriately staffed (comparable to the local policy for general education) and has other sufficient resources to meet the needs of the LIEP.</li> </ul>
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND demonstrates their LIEP resulted in positive student outcomes.

## Requirement 17.2. Annual Assessment

LEAs must annually assess the English Language Proficiency of all English learners. In Wisconsin, the English language proficiency assessment is the ACCESS for ELLs or alternate ACCESS for ELLs. Sections 1111(b)(2)(G) and 3113 (b)(3)

*This is required for LEAs who manage their own funds as well as those who are part of a Title III consortium.*

## Resources

- Preparing for Access Testing: <https://wida.wisc.edu/assess/access/preparing-students>
- Preparing to Administer WIDA Alternate ACCESS: <https://wida.wisc.edu/assess/alt-access/preparing>
- EL policy Handbook, Chapter 5- Annual ELP Assessment: [https://docs.google.com/document/d/18YkkV\\_WMy4oTfMEDEPbR5fWvhjWdMK8y1I7558VJiXw/edit#heading=h.c94t81rkq9gf](https://docs.google.com/document/d/18YkkV_WMy4oTfMEDEPbR5fWvhjWdMK8y1I7558VJiXw/edit#heading=h.c94t81rkq9gf)

## 17.2. Required Documentation

Procedures for administering annual ACCESS for ELLs and/or Alternate ACCESS for ELLs assessment.

### 17.2. Guiding Questions

1. Describe the procedures in place to ensure that students identified as ELs are assessed, and are assessed using the appropriate ACCESS for ELLs or Alternate ACCESS for ELLs assessment.
2. Describe the process in place to ensure the content area standards (ELA, reading, mathematics, science and social studies) and the English language development standards are working together to support student success on the ACCESS or Alternate ACCESS for ELLs assessment.
3. What systems are in place to ensure the annual assessment for ELs is administered with integrity using the same or similar processes used to administer other state and federally required assessments. How do these systems:
  - a. Ensure test materials are stored correctly;
  - b. Ensure teachers have been successfully trained to administer the assessment;
  - c. Ensure all EL students are included in the assessment and given opportunities to practice and engage with the testing platform prior to administration;
  - d. Ensure test administrators are actively monitoring students' progress while they are engaged in the assessment. (i.e, making progress towards completion, monitoring cell phone use, addressing student behavior challenges, supporting students to record themselves correctly while completing the speaking test, etc...); and
  - e. Ensure ELs with disabilities get the appropriate accommodations including if the accommodations met the student's needs or a process to add or change accommodations based on evidence.
4. What process is in place to inform parents and guardians of the opening assessment window, ongoing language proficiency progress, and summative testing results, which also includes communicating this information to parents in a language they can understand?

### 17.2. Rubric

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<b>Beginning</b>	The LEA does not test all English learners and/or have procedures in place for the annual assessment of English learners. (i.e., test administration and security, appropriate training for testing, monitoring of test administration, and communicating results to parents of ELs).
<b>Developing</b>	The LEA has procedures in place, but may not include all English learners in the annual assessment, provide appropriate accommodations to ELs with disabilities, or test all domains (reading, writing, listening, or speaking) in ACCESS for ELLs or alternative ACCESS for ELLs.
<b>Accomplished</b>	The LEA has procedures in place for the annual assessment of all English learners and ensures all domains of the test (reading, writing, listening, or speaking) in ACCESS for ELLs or alternative ACCESS for ELLs are given.

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**Exemplar**

The LEA meets the criteria in the “Accomplished” category and covers the whole scope and sequence for conducting standardized assessments (i.e., test preparation, meaningful communication with families in a language they can understand concerning the administration of the test, etc.) entire process.

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## **Requirement 17.3. Program Evaluation**

LEAs must use Title III funds for effective approaches and methodologies to assist ELs in attaining English proficiency and parity of participation in the standard instructional program by providing effective language instruction educational programs that meet the needs of ELs which includes their families and demonstrates success in increasing and building local capacity to meet this need.

*Section 3115(c)*

### **Resources**

- Tools and resources for evaluating the effectiveness of a district’s EL program:  
<https://www2.ed.gov/about/offices/list/oela/english-learner-toolkit/chap9.pdf>

### **17.3. Required Documentation**

Most recent results or plan for continuous improvement for measuring the effectiveness of the LIEP program(s). (Note: the LEA’s process for continuous improvement at the district and/or school level should be inclusive of the LIEP for students who are ELs.)

### **17.3. Guiding Questions**

1. Describe the processes in place for planned, deliberate continuous improvement to ensure effective approaches and methodologies proven-effective for teaching ELs, effective LIEPs are implemented with fidelity. Discuss items such as a logic modal, theory of action, well-defined measurable goals, clearly outlined roles and responsibilities for people involved and implementation timeline.
2. How does your LEA ensure there is sufficient staffing and resources to implement an effective program based on sound theory by experts in the field?
3. Data for decision making:
  - a. What data is used in the evaluation process to determine program effectiveness (e.g. comparable performance data that is longitudinal in nature and includes a variety of learners, current ELs, former ELs, never-EL, ELs w/disabilities, etc.)?
  - b. What is the process to use, gather, and analyze data to identify areas of improvement and modify the LIEP programs and services, as appropriate?
  - c. What research regarding proven effective instructional approaches for promoting language proficiency and academic achievement do you use?
  - d. What recent findings in your LEA’s program evaluation are driving continuous improvement of your Language Instruction Educational program(s)?
4. Does the evaluation cover all procedural and service provision requirements set forth in the LIEP, including instruction, family engagement, and professional development?



### 17.3. Rubric

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<b>Beginning</b>	The LEA does not provide evidence of continuous improvement to ensure effective approaches for teaching ELs in providing language instruction and access to content.
<b>Developing</b>	The LEA provides a basic process of continuous improvement to ensure effective approaches for teaching ELs in providing language instruction and access to content, BUT does not include a variety of data sources or all of the procedural and service provisions requirements that are set forth in the LEA's LIEP.
<b>Accomplished</b>	The LEA has a complete evaluation process that works towards attainment of language proficiency and parity of participation in the standard instructional program which is driven by multiple data sources and covers all procedural and service provision requirements that are set forth in the LEA's LIEP.
<b>Exemplar</b>	The LEA meets the criteria in the "Accomplished" category AND demonstrates an evaluation process with actionable steps for the district, school, and student levels and includes EL stakeholders (i.e. students, parents, community members) as part of the entire process.

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### Requirement 17.4. Consortium Participation

LEAs with Title III allocation that is less than \$10,000 must join a Title III consortium to support their students who are English learners (ELs). *Section 3114(b)*

*This section only applies to local educational agencies (LEAs) who are eligible for Title III funds, but do not meet the threshold of \$10,000 required to manage their own funds.*

#### Resources

- DPI's webpage on the Title III Consortium: <https://dpi.wi.gov/english-learners/title-iii/consortium-guidelines>

### 17.4. Required Evidence

Memorandum of Understanding (MOU) or written agreement demonstrating how the consortium is meeting the local needs of the LEA.

*Note: The MOU/agreement should address the LEA's needs to serve students who are ELs in instruction, professional development, and/or family engagement.*

### 17.4. Guiding Questions

1. Describe the processes in place for planned and deliberate consultation with the consortium leaders to meet the needs of local students identified as English learners.
2. Describe how data sources are used to determine needs to be addressed with support of the consortium leaders.
3. How is your LEA engaged in the budgeting process with the fiscal agent?
4. How are all teachers and principals (not only English learner and bilingual specialists) included in consortium activities related to meeting the needs of multilingual learners?
5. Describe the process in place to include private schools' participation, when applicable, in collaboration with the consortium.

## 17.4. Rubric

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<b>Beginning</b>	The LEA does not provide an MOU or written agreement.
<b>Developing</b>	The LEA has an MOU or written agreement with the consortium leader, BUT contains “boilerplate” language and does not specifically address the needs of students who are ELs in the LEA or ELs attending private schools, if applicable.
<b>Accomplished</b>	The LEA has an MOU or written agreement with the consortium leader that is specific to the needs of the students who are ELs in the LEA, including ELs attending private schools, if applicable.
<b>Exemplar</b>	The LEA meets the criteria in the “Accomplished” category AND has regular standing meetings with the consortium leader to address concerns and continue improvements to the activities within the coordination agreements.

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# Title IV, Part A Requirements

## Purpose of Title IV, Part A

The purpose of the Title IV, Part A, Student Support and Academic Enrichment grant is to improve students' academic achievement by providing all students with access to a well-rounded education, improving school conditions for student learning, and improving the use of technology in order to improve academic achievement and digital learning for all students.

## Section 18 - Title IV Activities

### Requirement 18.1. Prioritization

LEAs will prioritize the distribution of funds to schools or populations with the greatest needs.  
*Sections 4106(e)(2)(A)*

#### 18.1. Required Documentation

A synopsis of how funded activities align with schools or populations of greatest need.

#### 18.1. Guiding Question

1. What criteria were used to determine which schools or populations received funding?

#### 18.1. Rubric

<b>Beginning</b>	The LEA does not provide evidence that Title IV-A funds are being directed to schools or populations of greatest need.
<b>Developing</b>	The LEA provides a summary of which schools or populations are receiving Title IV-A funds, BUT does not provide evidence that data was used to drive funding decisions.
<b>Accomplished</b>	The LEA provides a synopsis that includes criteria used to direct funding to schools or populations of greatest need and provides a summary of activities chosen and schools/populations receiving the funding.
<b>Exemplar</b>	The LEA meets the criteria in the "Accomplished" category AND demonstrates that a needs assessment was used to drive funding decisions, regardless of the size of the district allocation.

## Appendix A - Targeted Monitoring for Cross-Cutting Federal Fiscal Requirements

### Fiscal Monitoring

The DPI is required to “evaluate each subrecipient’s risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring,” (Uniform Grant Guidance 2 CFR §200.331).

DPI’s auditors and grant accountants on the School Financial Services Team, along with federal fiscal monitoring consultants, other program staff, and assistant directors, annually perform an assessment process for all grant subrecipients. The process is designed to determine the appropriate amount of subrecipient monitoring, not to deny the subrecipient federal funds.

In late spring, the group identifies risk factors and reviews current year fiscal data previously collected by DPI to meet other state or federal requirements. Subrecipients are then evaluated for risk based on the identified factors which include: total dollar amounts of federal funds awarded, known fraud, significant or multiple audit findings, new subrecipient of a federal award, claims not matching annual report, programmatic monitoring findings, and other fiscal concerns.

Subrecipients are rated as low, medium, or high risk. Any subrecipients with a medium or high risk assessment will receive terms and conditions for the upcoming fiscal year’s federal grants. These terms and conditions could be one or more of the following:

- Technical assistance provided the subrecipient by DPI staff
- Virtual site visit
- Submit quarterly claims on Title I and IDEA flow through grants
- Submit general ledger which tracks by project code to support claimed amounts
- Submit a copy of written procedures for allowable costs, cash management, conflict of interest, and procurement
- Submit a bank reconciliation
- Site visit

Resources for federal fiscal regulations can be found on this webpage:

<https://dpi.wi.gov/wisegrants/uniform-grant-guidance>, and by viewing past episodes of the WISEgrants podcast found on this webpage: <https://dpi.wi.gov/wisegrants/weekly>.

### Single Audits

The DPI is responsible for ensuring subrecipients complete single audit reports for federal grant programs as required per 2 CFR §200.501. The federal grant single audits rely on the annual Compliance Supplement developed by the Office of Management and Budget (OMB) which identifies single audit guidelines and provides additional fiscal and program-specific compliance requirements for federal grants to independent auditors and auditees.

Single audits determine subrecipients’ compliance with financial and programmatic requirements for federal funding; and identify areas in which additional support and guidance is warranted related to the subrecipient’s fiscal management procedures. Areas identified as non-compliant by the independent auditor will result in a finding. All findings are reviewed by DPI; and if a finding is sustained, DPI will send a management decision letter that includes corrective action to be taken by the subrecipient.

Resources regarding single audits include: [Single Audit Information](#)