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ABSTRACT

This volume is the second module, "Monitoring," of the evaluation report documenting how states met the requirements of Title I of the Elementary and Secondary Education Act of 1965, as amended in 1978, and identifying exemplary State management practices and documents. The module begins with the history of monitoring provisions under Title I up to its replacement by Chapter 1 of the Educational Consolidation and Improvement Act. The next section of the module presents States' preliminary views on the future of monitoring and their tentative plans for operating under Chapter 1. All but 3 of the 49 respondents would like to continue some form of monitoring, though shortages of staff and monetary resources are anticipated problems. The last section presents examples, selected from those supplied by the States, of monitoring practices and materials organized by both processes (team approach and onsite reviews); and materials (checklists, handbooks, and feedback reports). Brief descriptions of the practices are given, and the actual monitoring documents are presented. (MLF)

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A Study of State Management Practices: Looking Back at Title I and Toward Chapter 1

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MANAGEMENT MODULE: **Monitoring**

Judith A. Appleby

August 1982

EA 015 513

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MANAGEMENT MODULE: MONITORING

Judith A. Appleby

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Barbara L. Bessey
Director

Laurie R. Harrison
Assistant Director

Introduction

This management module is one of four produced by the State Title I Management Practices Study to provide information on various options that states may use to manage their Chapter 1 programs. The four modules are on the following topics:

- Application Approval,
- Monitoring,
- Parent Involvement, and
- Enforcement.

Each management module contains examples of materials produced by Title I coordinators, their staff, or their districts as part of their administration of the Title I program.

Chapter 1 of the Education Consolidation and Improvement Act replaces Title I of the Elementary and Secondary Education Act. Under Chapter 1, more management decisions are left to states. However, some states will have fewer state administrative funds under Chapter 1 than they did under Title I. These states may have to cut back on their members of staff, which may mean that staff with specialized expertise--in monitoring or parent involvement, for example--will be let go in favor of more "generalist" types of staff. Because of this potential loss of Title I experience, four management modules were developed to present a picture of some of the more creative practices and approaches used in past administration of Title I programs. While some of these requirements are not present in Chapter 1 or not included to the same extent as they had under the 1978 Title I statute (Public Law 95-561), the results of the State Management Practices Study indicate that most of the Title I coordinators reported plans to continue activities in these areas under Chapter 1 (Bessey, Brandt, Thompson, Harrison, Putman, & Appleby, 1982). It is hoped that the practices and examples included in these management modules can be adopted or adapted by interested states at minimal cost, or that states wishing to develop new practices may find some successful past examples presented herein after which these new practices can be modeled.

Content of the Management Modules

Each module is organized into three sections:

- a brief history of the management responsibility from Title I to Chapter 1,
- states' preliminary plans for operating under Chapter 1 as collected by the State Management Practices Study through in-depth telephone interviews with 49 Title I coordinators and through follow-up interviews conducted onsite to a nationally representative sample of 20 states, and

- examples of successful materials and practices used by states under Title I.

Selection of the Examples for Inclusion in the Management Modules

As part of the State Management Practices Study, all state agencies receiving Title I funds were asked to send AIR materials, documents, handbooks, forms, applications, instructions, rules, checklists, and so on that they used in their administration of Title I programs. These materials were supplemented with other materials collected by the U.S. Department of Education, such as the Monitoring and Enforcement Plans, and specific materials solicited by the study staff that surfaced during the telephone interviews or the onsite visits.

All of the materials and examples included in these modules are noteworthy—they were selected from thousands of documents collected from states. In some cases, the choices were difficult, since several states had similar materials that were all considered to be exemplary. The final materials were selected on the basis of:

- their interesting or unusual content,
- their interesting or unusual format,
- ease of reproduction, and
- a desire to present a variety of techniques and materials.

It is important to emphasize, however, that some very successful practices or materials from states may have been overlooked—either because they were not submitted to AIR as part of the study's initial requests for materials or because an attempt was made to select materials from the largest number of states possible to ensure greater variety.

Use of the Management Modules

It is intended that the materials and examples included in each module will stimulate state Chapter 1 staffs to generate new and creative ideas for successful management of their Chapter 1 programs. Some of the examples are presented in their entirety for ease in xeroxing if desired. Other examples are merely illustrative of a particular point or practice. In any case, states are encouraged to contact the Chapter 1 offices in state agencies that developed the materials to request more information. A list of the addresses for each of the states for which examples are included in the modules is presented as Appendix A for informational purposes.

I. Monitoring: From ESEA Title I to ECIA Chapter 1

What is monitoring? Monitoring is the process of determining the extent to which Title I programs are in compliance with federal and state legal requirements. It is also a vehicle by which states can render technical assistance to their applicant agencies, identify exemplary programs, and determine the quality of services provided to the program's beneficiaries. Gaffney, Thomas, and Silverstein (1977) identify three essential components of states' monitoring efforts. Specifically, states were to make determinations of:

- The legality of the programs and projects--Are programs and projects in compliance with the LEA program requirements?
- The fidelity of the Title I program with the project application--Is the LEA's program being implemented according to the design indicated in the application?
- The quality of the services provided to participating children--Do the services being provided appear to be meeting the needs of the children in the program?

Broadly interpreted, monitoring includes a number of activities in addition to formal onsite monitoring visits. For example, reviews of an LEA's application to determine whether Title I projects are designed in line with the designated program requirements is a form of monitoring. In fact, reviews of any reports submitted by an LEA or communications with LEAs can be considered monitoring, because the SEA is both assisting the LEA and at the same time discovering problem areas--monitoring. Districts on the other hand, tend to view the formal visits as the only monitoring activities conducted by states.

Regardless of whether monitoring is narrowly or broadly defined, it is one of the major and time-consuming responsibilities of states. It is not limited to formal visits once a year. It is a constant and ongoing process of overseeing all activities described in the LEA application. When these activities change or expand, the level of effort SEAs spend on monitoring also changes or expands accordingly.

In July 1981, Congress passed the Education Consolidation and Improvement Act (ECIA). Chapter 1 of ECIA replaces Title I of the Elementary and Secondary Education Act (ESEA), originally passed in 1965 and revised in 1971, 1974, and 1978. Chapter 1 contains the same funding provisions and the same general purposes as Title I, but many of the specific requirements have changed. These changes are certainly apparent in the area of monitoring. To understand these changes, it is necessary to understand the evolution of monitoring provisions under Title I.

Prior to the 1978 Amendments to ESEA, Title I legislation did not specifically describe a monitoring role for states, although requirements for state monitoring practices were found in various parts of the Title I

legal framework--in the GEPA statute and regulations and a handbook and Program Support Package prepared and disseminated by the U.S. Office of Education (now ED). For the first time, the 1978 legislation required SEAs to adopt minimum standards for monitoring as described in Section 167:

"MONITORING

"Sec. 167. Each State educational agency shall adopt standards, consistent with minimum standards established by the Commissioner and with the State monitoring and enforcement plan submitted under section 171, for monitoring the effectiveness of programs and projects assisted under this title. Such standards shall (1) describe the purpose and scope of monitoring; (2) specify the frequency of onsite visits; (3) describe the procedures for issuing and responding to monitoring reports, including but not limited to, the period of time in which the State educational agency must issue its report, the period of time in which the applicant agency must respond, and the appropriate followup by the State educational agency; (4) specify the methods for making monitoring reports available to parents, State and local auditors, and other persons, and (5) specify the methods for insuring that non-compliant practices are corrected.

The 1978 Amendments also included a provision requiring each SEA to submit to the U.S. Commissioner of Education a monitoring and enforcement plan (MEP) once every three years. This plan was to describe a program of regular visits by SEAs to local projects and procedures for verifying information, conducting audits, resolving complaints, and monitoring the compliance of LEAs in providing equitable services to children enrolled in private schools. Along with the submission of the MEPs, states were also required to report on their monitoring and enforcement activities over the previous reporting period.

The 1978 Amendments described these requirements in Section 171:

**"Subpart 3—Responsibilities of State Educational Agencies to
Commissioner**

"STATE MONITORING AND ENFORCEMENT PLANS

"SEC. 171. (a) STATE PLAN.—Each State educational agency participating in programs under this title shall submit, at such times (at least once every three years) and in such detail as the Commissioner shall prescribe, a State monitoring and enforcement plan. Such plan shall set forth—

"(1) a program of regular visits by State educational agency personnel to projects assisted under this title;

"(2) the matters to be reviewed during such visit;

"(3) procedures for verifying information provided by local educational agencies and State agencies, including the use of other information available to the State to cross-check that information;

"(4) procedures for regular audits of local educational agency and State agency expenditures under this title, and procedures for the recovery of any expenditure determined not to be allowable under this title;

"(5) procedures for resolving each complaint received by the State relating to programs assisted under this title, including complaints referred to the State by the Commissioner and complaints by representatives of children enrolled in private schools that those children are not receiving the services to which they are entitled under this title; and

"(6) a description of the means by which the State educational agency has determined, and will continue to determine, the compliance by local educational agencies with the requirements of section 130 relating to the equitable provision of services to children enrolled in private schools.

"(b) REPORT.—Each plan submitted by a State educational agency under this section shall include a report, in such form as the Commissioner shall prescribe, of the activities undertaken by the State in the years since the previous plan was filed to carry out its monitoring and enforcement efforts under this title.

In 1978 the state administrative setaside was increased from 1 percent to 1.5 percent. The additional .5 percent was to be used for the development of the MEPs and the independent audit required by the 1978 regulations.

Although Title I was first authorized in 1965 and nothing specifically on monitoring appeared in Title I legislation until 1978, the importance of the monitoring function was recognized by Congress for more than a decade. However, as noted by the NIE study of the state legal framework, the legal framework was unclear concerning the proper and efficient monitoring of Title I programs (Gaffney, Thomas, & Silverstein, 1977).

A need for improved state monitoring systems was noted in a request to Congress by the Comptroller General in 1975. The Comptroller General found that about 35 percent of the states visited as part of the study had no formal monitoring systems. The report also suggested that the SEA monitoring visits in the observed states were generally too brief. It further stated that the brevity of the visits was felt to undermine an important component of the SEA monitoring function: the process of making judgment as to program quality. The report concluded that the states

reviewed needed to establish comprehensive monitoring procedures, formalize existing procedures, or conduct more indepth reviews during monitoring visits, if these visits were to be useful in evaluating districts' performance (Committee on Education and Labor, 1978).

The NIE Study of Compensatory Education (1977), in its review of the state administration of Title I, concluded that the states in their study differed widely in how they carried out their administrative responsibilities in the monitoring area.

The House Committee on Education and Labor concluded in its report on the Education Amendments of 1978:

Monitoring is an important part of State administration of Title I. The Office of Education should, in the course of conducting its own program reviews of State administration, insure that such State procedures have been developed and that they are consistent with minimum standards for State educational agency monitoring established by the Commissioner in Title I regulations. (p. 45)

A review of state management practices of Title I from 1965-1976, conducted by SRI International (1979), analyzed the findings of audits and Department of Education (then U.S. Office of Education) program reviews from 1965 to 1976. This study concluded that inadequate scope and frequency of monitoring were consistent problems over the years. While the most recent period (1974-1976) showed an improvement in checks for compliance, problems continued to be observed in the areas of monitoring for program quality and the adequacy of specific program design features. The report suggested that the MEPs required of SEAs by the 1978 Amendments should help in dealing with the persisting problems of inadequate scope and frequency of monitoring reported by the reviewers.

The results of these various studies and others contributed to the passage of the 1978 Title I legislation, which contained specific stipulations on monitoring as well as other state responsibilities. While this resulted in an increase in the length, detail, and prescriptive nature of the law, the intent was to provide SEAs with clearer, more precise guidance to address areas of program need absent from previous legislation, and in many cases to increase flexibility in program management.

The proposed regulations for the 1978 Title I Amendments were published in 1979. However, Congress delayed issuing final regulations for a number of reasons; for example, the draft was confusing and could not be understood without reference to at least five other documents, and that it was lacking in required standards and examples that explain the manner in which the regulations operate (Committee on Education and Labor, 1979).

In January 1981, the final Title I regulations were issued. They clarified the previous draft, incorporated other applicable requirements referenced in the draft, and provided standards and examples for certain state responsibilities. The final regulations were lengthy and quite

detailed, providing substantial guidance for implementation of the 1978 legislation.

Section 200.150 restated the obligation of SEAs to adopt standards for monitoring, and Section 200.151 expanded on the minimum standards required of states in monitoring Title I projects. Section 200.21 expanded on the requirement of states to submit a formal monitoring and enforcement plan (MEP) to the Commissioner of Education (see Table 1 for a copy of these Title I regulations).

Title I projects operated under the 1978 statute and 1981 final regulations for only a brief time when, as a result of a change in federal administration and administrative priorities, Congress passed the Education Consolidation and Improvement Act (ECIA) in July 1981, to be effective 1 October 1982. ECIA revised Title I, and although the policy is to continue to provide financial assistance to SEAs and LEAs to meet the special needs of educationally deprived children on the basis of entitlements calculated under ESEA, Title I of 1965, the intent behind the legislation is to:

- eliminate burdensome, unnecessary, and unproductive paperwork;
- free the schools of unnecessary federal supervision, direction, and control; and
- free education officials, principals, teachers, and supporting personnel from overly prescriptive regulations and administrative burdens that are not necessary for fiscal accountability and make no contribution to the instructional program.

The amount of space and emphasis given to monitoring in ECIA Chapter 1 is a marked contrast from the 1978 legislation it replaced. In fact, it has totally eliminated the monitoring and MEP provision included in the earlier law. It has also reduced the percent allowed for state administration of Chapter 1 programs from 1.5 percent to 1.0 percent.

SEA monitoring of Title I programs has thus evolved from a period in 1965 when there were no requirements, to a period in 1978 when very specific stipulations were in force, to 1982 when, once again, monitoring is no longer mandated. Does this mean that state monitoring has come full circle and that the achievements of the past will be lost to the future? Not really. States now have years of experience in developing and refining their monitoring systems, regardless of legislation. And the 1978 Amendments provided states with an opportunity to formalize--to actually write down--many of the monitoring practices they had already been following. As noted by the report produced as part of the State Management Practices Study (Bessey, Brandt, Thompson, Harrison, Putman, & Appleby, 1982), most states feel that monitoring is of substantial importance in preserving the original intent of Title I. And the original intent has remained from 1965 to 1982. It is likely, then, that state monitoring activities will also remain. In the next section of this module, states'

preliminary views on the future of monitoring and their tentative plans for operating under Chapter 1 will be presented.

Title I Regulations: Monitoring and Monitoring and Enforcement Plans

State Monitoring

§ 200.150 Obligation to adopt standards for monitoring.

An SEA shall adopt standards for monitoring the effectiveness of the Title I projects operated by LEAs and State agencies. These standards must meet the standards in § 200.151 and be consistent with the MEP that the SEA submitted under § 200.21.

(Sec. 167, 20 U.S.C. 2814; Sec. 171, 20 U.S.C. 2821; Sec. 506 of Title V, 20 U.S.C. 3146)

§ 200.151 Minimum standards for monitoring.

(a) *Purpose and scope of monitoring.* In monitoring the effectiveness of Title I projects in its State, an SEA shall—

(1) Determine whether the Title I projects comply with applicable Title I requirements;

(2) Determine whether the Title I projects are being implemented in accordance with approved project applications;

(3) Evaluate the LEA's or State agency's efforts to assess and improve the quality and effectiveness of the Title I services being provided; and

(4) Provide technical assistance, if appropriate.

(b) *Frequency of on-site visits.*

Representatives of the SEA shall—

(1) Visit, at least once every three years, each LEA and State agency that operates a Title I project; and

(2) Visit, at least once every two years, those LEAs and State agencies that receive the largest amounts of Title

I funds or have a history of noncompliance with applicable Title I requirements.

(c) *Issuing monitoring reports.* Within 60 days of completing each visit that it conducts under paragraph (b) of this section, the SEA shall issue a written monitoring report to the agency that was visited. The SEA shall include in the report its findings and recommendations concerning—

(1) The agency's compliance with applicable Title I requirements;

(2) The LEA's or State agency's efforts to assess and improve the quality and effectiveness of the Title I project; and

(3) The need for corrective action, if any.

(d) *Responding to monitoring reports.*

Within 45 days of receiving an SEA monitoring report that recommends improvements or requires corrective action, the monitored agency shall submit a written response to the SEA. The agency shall include in its response—

(1) A description of all steps that it has taken, or will take, in response to the SEA's recommendation for improvements or requirement for corrective action; and

(2) If appropriate, a statement of the agency's reasons for not making the improvements or taking all or a part of the corrective action that was required by the SEA.

(e) *Follow-up on recommendations or corrective action.* (1) Within 45 days of receiving the response required under paragraph (d) of this section, the SEA shall review that response to determine whether follow-up action is appropriate.)

(2) Follow-up action may include one or more of the following compliance procedures:

(i) A follow-up visit.

(ii) An audit under §§ 200.190–200.193.

(iii) A withholding action under §§ 200.200–200.201.

(iv) A compliance agreement under §§ 200.210–200.214.

(f) *Making monitoring reports available.* The SEA shall—

(1) Notify the monitored agency of any follow-up action that the SEA plans to take under paragraph (e) of this section;

(2) Send a copy of the monitoring report, any response by the LEA or State agency, and a statement of any follow-up action that the SEA plans to take to the following:

(i) The district advisory council that has been established for the agency that was monitored.

(ii) State and local auditors; and

(3) Provide access, under § 200.141, to the monitoring report, any response by the LEA or State agency, and a statement of any follow-up action that the SEA plans to take.

(Sec. 167, 20 U.S.C. 2814; Sec. 506 of Title V, 20 U.S.C. 3146)

§ 200.21 State monitoring and enforcement plan (MEP).

(a) *Submission of the MEP.* An SEA that receives Title I assistance shall submit to the Secretary—

(1) A single MEP that covers all Title I programs; or

(2) A separate MEP for each of the four categories of Title I programs described in § 200.3.

(b) *Frequency of submission.* (1) The SEA shall submit the MEP, or MEPs, required under paragraph (a) of this section at the times the Secretary prescribes.

(2) In any case, this shall be at least once every three years.

(c) *Contents of the MEP.* The MEP must include—

(1) A report of the Title I monitoring and enforcement activities that the SEA has conducted since submitting its previous MEP;

(2) A program of regular visits by SEA personnel to Title I projects that meets the requirements in § 200.151;

(3) A statement of the matters to be reviewed during the site visits that meets the requirements in § 200.151;

(4) A description of the SEA's procedures for verifying information provided by LEAs and State agencies, including the use of other sources available to the SEA to verify that information;

(5) A description of—

(i) The State's procedures required by § 200.190 for conducting regular audits of Title I expenditures made by LEAs and State agencies; and

(ii) The SEA's procedures for resolving audit findings and

recommendations under §§ 200.191–200.196;

(6) A description of the SEA's procedures for resolving direct complaints and appeals under §§ 200.180–200.186; and

(7) A description of the SEA's methods for determining that LEAs are in compliance with the requirements in 34 CFR 201.80–201.82 and 34 CFR 201.90–201.97 concerning the equitable provision of services to children enrolled in private schools.

(d) *Amendments.* An SEA shall submit to the Secretary amendments to an MEP whenever the SEA has substantially changed a policy or procedure that is described in that MEP.

(e) *Copies of MEP.* Upon request, an SEA shall provide, without charge, a copy of its current MEP to any Title I advisory council or LEA.

(Sec. 171, 20 U.S.C. 2821)

II. States' Preliminary Plans Regarding Chapter 1 Monitoring Activities

Since monitoring by the states is no longer mandated, one might think the LEAs are left to their own devices to determine whether or not they are in compliance with the new law. However, the issue involved here is that the federal government considers the states responsible for the proper expenditure of funds, and the auditors will expect to see that LEA programs are operating within the constraints of the law or demand that funds be returned.

What then, are the views of states regarding the future of monitoring? The State Management Practices Study obtained responses to this question in several ways. First, state Title I coordinators indicated in telephone interviews what monitoring activities they would continue if none were specifically required by law. In addition, the study collected follow-up data onsite from a nationally representative sample of 20 state Title I coordinators regarding their plans for operation under Chapter 1. While these data are based upon only preliminary planning, they reflect the direction of management chosen by this sample of states as of the date of the interview. Onsite interviews were conducted between September 1981 and May 1982.

During telephone interviews, state Title I coordinators were asked whether they would continue to include monitoring as part of their program management if there were no requirements in the Title I law for them to do so. These results are shown in Table 2.

From the table it is apparent that all but three of the respondents (46 out of 49) would definitely like to continue some form of monitoring, even if no monitoring were required of them.

Almost one-half of the respondents (N=23) indicated they would plan to continue monitoring practices that were similar to what they were already doing. The most frequently mentioned "similar practices" were fiscal accountability and emphasis on monitoring for program quality.

Another large group of states (N=12) indicated they would like to continue to include monitoring practices but not to the extent required by the 1978 law. These states indicated they would do monitoring less frequently or monitor the smallest LEAs less frequently; that they would delete some of the monitoring requirements, such as the one requiring that reports be sent to Parent Advisory Councils; or that examinations of technical data (e.g., comparability, Parent Advisory Council participation) be simplified.

Nine of the states proposed different types of monitoring practices. These practices included more of a focus on technical assistance or program quality, even if adherence to compliance suffers; the proposal to rely on monitoring provisions specified by the state for its educational programs or to include monitoring as part of other state-sponsored programs; or the proposal to include LEAs in the decisionmaking process to determine which LEAs should be monitored, the frequency of monitoring, and the items to be monitored. (See Bessey et al., 1982, for an amplification of these findings.)

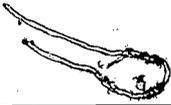


Table 2

Monitoring Continuation Plans

<u>Plan</u>	<u>Number of States</u>
● Don't know	3
● Yes (plans unspecified)	2
● Similar to current practice	23
- Monitor for fiscal accountability	11
- Monitor for program quality	11
- Insure integrity to application	1
● Modified practices	12
- Monitor all districts but less frequently	6
- Monitor fewer requirements	4
- Simplify examinations of source data (e.g., comparability reports or maintenance of effort)	3
- Other modified practices (e.g., monitor smaller districts less frequently)	3
● Different practices	9
- Monitor less for program compliance and more for program quality even if adherence to compliance suffers	4
- Involve LEAs on decisions about what items should be monitored	4
- Include as part of state law or as part of state requirements for other educational programs	3

Thus, if not required by law, would state monitoring practices continue? Most states say "yes" and that they would continue similarly to current practice.

Since the provisions of Chapter 1 were not in existence at the time of the early interviews, the answers to this question were purely speculative. As time passed, and when the Chapter 1 requirements became better understood, the answers to this question became more definitive as to specific activities that were definitely to be included (or not included) as part of future Chapter 1 management.

During the follow-up onsite visits, after Chapter 1 provisions were more widely known, state Title I coordinators were asked about their specific plans to continue monitoring at the state level under Chapter 1 and the reason(s) for this decision; if so, how their activities might change; and if they anticipate any problems in carrying out the activities.

Of the twenty Title I coordinators questioned, nineteen --all but one--stated that they planned to continue monitoring activities under Chapter 1. The one state coordinator who said "no" stated that he would like to eliminate monitoring but continue the annual evaluation visit to LEAs. This is a monitoring-like activity, which includes technical assistance. For all intents and purposes, then, all twenty states visited by the staff of the State Management Practices Study planned to continue monitoring, in some form, under Chapter 1.

Title I coordinators provided several major reasons for their decisions to continue monitoring. Here is a sampling of those reasons:

With a large program with a separate title, the SEA should maintain a dedicated monitoring group. We have to keep going over and over things with LEAs because issues are complex and not easily understood.

The SEA is responsible for this function. State regulations require it. We have invested a lot of dollars in our review process and have refined it.

The bottom line lies with the auditor, and the SEA is willing to help LEAs become legal.

We will monitor LEAs to help protect them in case of audits.

Monitoring is an important role of the SEA.

We want to help districts solve any problems of compliance.

The law has some requirements; monitoring is part of the SEA leadership role; and the LEAs will expect it.

We have always monitored; it has great value for program quality and compliance.

Monitoring is important for determining technical assistance needs.

Monitoring is important for compliance and assisting LEAs to develop more effective programs.

Monitoring is a state responsibility to assure that funds are spent within the intent of the law. It also leads to program improvement.

Monitoring is necessary to ensure compliance with federal rules and the approved project application. It is also the main vehicle for providing technical assistance.

Will states continue monitoring under Chapter 1? Clearly, states say "yes." Monitoring is an important state responsibility that helps LEAs to achieve legal compliance and fidelity to their applications, and to develop more effective programs.

State Title I coordinators were also asked if they planned to continue monitoring, would these activities change from what they are currently doing and, if so, how? Of the twenty Title I coordinators questioned, fourteen anticipated that their monitoring activities would change, four expected them to remain essentially the same as current practice, and two "didn't know." Apparently, most states are expecting some changes in monitoring activities in comparison with what they are currently doing.

What kinds of changes might occur in state monitoring activities? Here is a sampling of what coordinators say:

We will concentrate our limited resources in monitoring to protect LEAs in compliance matters. We will have to cut back in technical assistance.

The monitoring requirement is intrinsic in the legislation. At some level, somebody is going to want to know what's going on, if not the federal government, it will be the state legislature.

We may have to monitor every four or five years instead of every three.

We will not call it "monitoring," but we will conduct program reviews upon request of the LEAs only. Most LEAs will want these voluntary reviews, especially to look at new program activities.

We will do less monitoring due to a reduction in staff.

We will concentrate on the large districts and pay less attention to the many smaller ones around the state.

We will do monitoring less often and to fewer LEAs mainly those needing the most assistance. We will also reduce the number of areas monitored.

We will invest less effort in monitoring, and monitor fewer districts.

The emphasis in monitoring will be a little different. We will focus more on achievement than how the dollars were spent.

We will spend more time in monitoring fiscal areas and also on areas that LEAs request help on in their applications. We'll look at size, scope, and quality, and needs assessment more than in the past.

We will place less emphasis on the monitoring checklist.

We will monitor to a lesser degree. We'll have fewer staff, conduct fewer visits, and review fewer program activities.

We may not monitor for quite as much, but we will definitely monitor.

Will state monitoring activities change from current practices? Most states say "yes" and that these changes will mainly involve doing less.

Finally, state Title I coordinators were asked if they anticipated any problems in carrying out their monitoring activities under the new law. Of the twenty coordinators, eight responded that they did not expect any problems, another eight responded that they did expect some problems, and for the remaining four the question was not applicable. Of those coordinators who did expect problems, these problems were ones of shortage of staff and monetary resources. One coordinator commented, "Monitoring is an expensive procedure and the dollar amounts are shrinking."

Apparently, states feel quite able to carry out their monitoring activities--they've been doing it for years--but the major challenge under Chapter 1 will be doing it with fewer staff and fewer dollars.

Do states anticipate problems in carrying out their monitoring responsibility? Some states say "yes" and some say "no." Clearly, monetary and staff limitations are the problems for those who say "yes."

Is there a future for monitoring even though it is no longer mandated? Yes, indeed. For states that expect to continue or modify their monitoring activities, this management module next presents examples of creative past practices identified by the study that may be useful to Title I coordinators in management planning for Chapter 1.

III. Examples of Monitoring Practices and Materials

States are proud of the monitoring practices they have developed. As indicated in the report produced by the State Management Practices Study, the overwhelming majority (76%) of Title I coordinators, when asked if exemplary monitoring practices were developed in their states, said "yes." These exemplary practices include both processes and materials.

This module now provides a sampling of these practices that may prove helpful to states in further refining their Chapter 1 management systems. The practices have worked well for the state that developed them--and the State Management Practices Study staff feels they are noteworthy based on a review of documents from all 50 states.

It should be noted that these practices and materials are examples only. They are the best of the past--the best of Title I. Although it is likely that there will be fewer staff and fewer dollars for monitoring under Chapter 1, perhaps the examples from Title I can be used as a basis for developing forms and ideas for use in Chapter 1 management.

The practices are organized by both processes and materials. Brief descriptions of the practices are given, and the actual monitoring documents are presented at the conclusion of each section. The sections that follow are:

A. Processes

1. Team Approach
2. Onsite Reviews

B. Materials

1. Checklists
2. Handbooks
3. Feedback Reports

A. Processes

1. Team Approach

States using a team approach to monitor used various compositions for their teams including:

- SEA Title I staff,
- SEA staff combined across several federal or state programs,
- SEA and LEA Title I staff, and
- SEA central and regional office Title I staff.

Louisiana, for example has three monitoring teams, each team being composed of three or four persons. All team members are Title I staff. Each team monitors 22 LEAs every year. Monitoring team meetings are held before, during, and after the actual monitoring visit. Exhibit A.1.a outlines the activities at these meetings.

The coordinated monitoring approach involves staffs of various federally funded programs conducting monitoring activities in a district at the same time. In Texas, consultants from all programs (Title I, vocational education, special education, bilingual education, migrant education) go into the districts simultaneously, thereby eliminating the numerous interruptions that would occur if districts were reviewed separately for each program. A critical element of this approach to monitoring is a full-time central coordinator who develops the schedules for monitoring across programs.

Alaska uses a similar approach. Monitoring is conducted by a Federal Programs Unit team in which various federal programs--Title I, Title IV, special education, bilingual education, and vocational education--are monitored at the same time. Districts are monitored once every three years except for the six largest ones which are monitored every other year.

Both New York and Michigan have monitoring for Title I integrated with that for their state compensatory education program.

Colorado not only involves its own Title I staff in monitoring but also persons from school districts who are specialists in some area. These SEA/LEA teams are used in the larger districts with more complex activities. Individual Title I staff members conduct visits to the smaller LEAs. In this state, monitoring

is conducted every three years except for the largest districts which are monitored every year.

Illinois uses teams of Title I staff from both central and regional offices to conduct monitoring activities in LEAs. Districts are monitored once every other year.

MONITORING TEAM MEETINGS

Three types monitoring team meetings

1. Pre at least two
2. Operational components
3. Post to each type

Two basic pre-monitoring meetings

- Individual team strategy meeting
- Collective team meeting involving all members of monitoring team

Two basic operational team meetings

- Individual
- Collective

Two basic Post team meetings

- Collective teams' meeting
- Staff meeting

Pre

Collective - for all individuals on monitoring trip

- . to gather and assemble data on each LEA prior to the monitor
- . to know information before we go so as not to waste staff time particularly LEA staff time
- . to be prepared for possible problem areas so we can help staff to help children
- . to help our staff be in control of situations by being prepared
- . to know where to visit and what to look for
- . to adjust attitude
- . to monitor each parish in light of its own peculiarities and uniqueness
- . meetings will be held the day before a monitor usually a Tuesday afternoon in the office unless we are out of the office - then it would be Tuesday evening at the hotel

Individual Team Strategy Session

Prior to pre-monitoring meetings each team should have the following tasks completed.

- . travel approval - two (2) weeks prior
- . notification letter - two (2) weeks prior
- . pre-monitor report - available for meeting
- . schedule for monitor - available for meeting

NOTE: schedules will include records and schools on the first monitoring day.

Operational

- . Collective for all monitoring team
- . Two types of meetings
 - after first day
 - after second day

First Day aspects

- . entrance visit
- . observations
- . records
- . school visits
- . concerns
- . bureau priorities

Second Day aspects

- . strengths
- . weaknesses
- . what is most important?
- . what will help parish the most?
- . improvement expected?
- . analyze effect
 - positive versus negative
 - could result be so negative that it would hurt rather than help?
- . prepare for exit conference
- . use monitoring instrument

Operational

Strategy meetings by individual teams

First Day

- . team meeting to review day
- . collection of data
- . review records
- . review school visits
- . plan for next day
- . presentation to teams

Second Day

- . team meeting to review day
- . collection of data
- . problems
- . bureau priorities
- . organize concerns and strengths
- . reason for strengths, concerns, suggestions, technical assistance
- . verification of facts on third day
- . close out conference

Post

- . Review of monitoring trip
- . Monitoring report
- . Bureau priorities

Documentation

- pre-monitor report
- . schedule
- . monitoring instrument
- . monitoring report
- . coordination report
- . program dissemination
- . study of quality
- . final determination of monitor and any pertinent data

2. Onsite Review

This section provides information on the procedures five states have used for their onsite monitoring reviews. These procedures vary from state to state and are designed to meet needs specific to these states.

Arkansas's onsite review process is very comprehensive. Other states have also adapted and borrowed this process for their own. Exhibit A.2.a from Arkansas shows that procedures for making and conducting the visit are outlined, and ways of cross-checking the information are specified.

Colorado's onsite review process is noteworthy because monitors check both current and historical data, and LEAs receive a copy of the monitoring checklist and criteria prior to the on-site visit. (See Exhibit A.2.b.)

Exhibit A.2.c describes Illinois' onsite review process. A set procedure is used. Steps that take place before, during, and after the visit are clearly delineated. Of special note is the diagram on the utilization of the report that results from the monitoring review.

Ohio's onsite review process relies on highly qualified staff to conduct monitoring. All staff who conduct monitoring have a minimum of five years teaching experience and three years administrative experience. With such qualified staff, a structured monitoring checklist may not be necessary. Monitors, however, may create their own checklists for personal use. (See Exhibit A.2.d.)

In New York, a document called a Monitoring Work Form, specifies the items to be examined during the onsite monitoring review. It is of interest to note that a list of state and federal statutory references are provided for each compliance issue followed by a list of supporting documents that are to be checked to ensure compliance with each section of the law. (See Exhibit A.2.e.)

The examples presented for this section are from:

	<u>Page</u>
a. Onsite Monitoring Guide (Arkansas)	27
b. Onsite Review Process (Colorado)	33
c. Onsite Review Process (Illinois)	37
d. Monitoring Procedures (Ohio)	43
e. Monitoring Work Form (New York)	47

ON-SITE MONITORING GUIDE
ARKANSAS DEPARTMENT OF EDUCATION
FEDERAL PROGRAMS DIVISION
TITLE I PROGRAM SECTION

I. Introduction

We recognize that monitoring may include interviews with applicants at a Title I supervisor's desk, a telephone conversation, review of evaluation, mid-year, annual financial or auditing reports and careful review of applications. The basic and ultimate monitoring activity, however, is the on-site review of the program.

Title I, ESEA, has become quite complicated insofar as proper initiation and operation of program is concerned. We cannot leave the review of programs to chance by relying on informal methods. This Guide is prepared in order to give each Title I supervisor a set of uniform systematic procedures for planning and conducting an on-site monitoring visit, preparing a monitoring report, disseminating the report and conducting the necessary follow-up activities to insure that programs found in non-compliance are corrected.

II. Making The Visit

Each monitoring visit must result in a comprehensive review by one or more members of the Title I program staff. The visitors may include other SEA personnel as appropriate depending upon whether information received through reports or other means indicates a need for such joint participation.

A. Responsibility

The responsibility for properly conducting the on-site review and issuing the written report will rest with the Title I program team leader or assigned supervisor of the area desk to which the LEA is assigned. The priorities for monitoring of individual LEAs are to be established annually by each area desk using criteria developed and maintained by the Title I Coordinator to reflect the most pressing monitoring needs.

B. Planning the On-Site Visit

The date for the on-site visit should be established at least one week in advance whenever possible. The LEA should receive notice of the visit in writing and be given an opportunity to have documentation needed for the review available, PAC members present, and local responsibilities for the review assigned. A copy of the current advance notice letter and materials is attached (Appendix #1). It may be revised or amended from year to year as program requirements change or the LEA's role in the review is changed to meet changing information needs for conducting the on-site monitoring visit.

After the advance information has been sent, it often becomes necessary to establish a different date for the visit. This

may be accomplished by telephone or during a personal visit by an LEA representative. It is not necessary to resubmit the advance letter and materials.

C. Conducting the Review

Each visit will include the following minimum activities:

1. A short introductory meeting with the chief LEA administrative officer or designee.
2. A review planning meeting with the LEA Title I administrator and staff.
3. Interviews with the local Title I staff and PAC members including visits to all, or a representative selection of the Title I program activities in action.
4. Interviews with other personnel in the school district or community, if necessary to accomplish the purpose of the visit.
5. Review such records as are necessary to obtain adequate information for each part of the review as outlined in the monitoring instrument.
6. Hold an exit conference with the LEA Title I administrative staff and the LEA administrative head or designee to outline the major findings, concerns and recommendations which the LEA may expect to be included in the forthcoming monitoring report, and to provide an opportunity for LEA representatives to take exceptions or provide further information on monitoring findings.

D. Matters to be Reviewed

It is required that each on-site program review includes examination of records and observation of activities to determine the extent to which the program under review has been implemented and is being operated in compliance with both legal provisions and the terms proposed, negotiated and approved in the program or project application.

Legal provisions include those applicable under the General Education Provisions Act (GEPA) as defined by Title 64 CFR 100b and Title I of the Elementary and Secondary Education Act and administrative rules at Title 64 CFR 116. Project or program terms include the assurances and certifications contained in the LEAs general application provided under Section 436, GEPA, and those in the program application, as amended.

As each may be applicable to the LEA visited, the specific matters to be reviewed will include, but not necessarily be limited to:

1. Project area selection

2. Needs assessment and pupil selection
3. Staff development in general and joint teacher/teacher aide and volunteer in-service training in particular
4. Planning in general and particularly the extent of the involvement of parents, school board and teachers
5. Parent advisory councils and their activities
6. Pupil support services in general and particularly support services for health, social and nutritional needs, including possible coordination with other programs
7. Local program monitoring and enforcement activities
8. Dissemination of program improvement information to Title I staff
9. Title I instructional activities including relationship of objectives to needs assessment
10. Financial and other recordkeeping procedures and practices
11. Comparability Reports
12. Evaluation and reporting of program effectiveness
13. Participation of children from private schools
14. Service to children in eligible local institutions for neglected or delinquent children
15. Equitable use of funds in attendance areas according to needs
16. Restrictions on general education and supplanting practices
17. Program size, scope and quality
18. Complaint resolution policies
19. Public information policies
20. School-wide projects and other special program features

A copy of the current monitoring review instrument is attached (Appendix 2). This form must be used to record data and information on each LEA visited. It may be revised from time to time as needed to reflect changing program requirements or SEA information needs.

III. The Monitoring Report

A monitoring report must be prepared and disseminated following every on-site monitoring visit. The report should be completed and disseminated within a period of ten (10) working days following the visit; however, difficulty in cross-checking data or other eventualities may delay this. Under no circumstances may the report be disseminated later than 45 days following the meeting. This is the maximum time allowed under Federal recommendations.

A. Cross-Checking Information

In support of the statistical data and other information gathered by the on-site review, each area desk will cross-check, where appropriate or deemed necessary, by review of information in other SEA divisions and/or sections.

1. Sources

Specific sources of cross-check data to which each area desk will have ready access include but are not limited to:

- (a) SEA central computer data
- (b) Budgets and annual financial reports from the Division of Administration
- (c) Annual reports on all elementary and secondary schools filed with the Instructional Services Division
- (d) The annual State reports made by the Arkansas Legislative Audit Division
- (e) Evaluation, financial, monitoring and other reports on Title I in previous years and
- (f) The "Annual Statistical Report of the Public Schools of Arkansas"

2. Determinations

Each of the sources of information listed above provide data to make one or more determinations or verifications of specific Title I requirements. For example:

- (a) The central computer data includes teacher certification and special training areas such as reading specialists or other and also provides information on individual salaries.
- (b) Annual financial reports provide information on total current expenditures from which maintenance of effort can be determined.
- (c) Annual reports to Division of Instruction provide information on daily class schedules and pupil load for each teacher.

- (d) State audit reports serve to provide historical data on fiscal compliance of LEAs.
- (e) Title I reports on previous years provide historical information on size, scope and quality of programs in each LEA and the amount of success or failure.
- (f) This report provides data covering two or more years and the rankings of all LEAs by several factors, such as whether local staff is increasing or decreasing with increasing Title I funds.

B. Preparing the Report

Each monitoring report shall follow a pre-determined outline keyed to the monitoring instrument. A copy of the current outline is attached (Appendix #3). It may be changed to meet changing needs from time to time. The report will address the review findings in each area covered by the outline. In those areas found to be operated within legal requirements, but having need for improvement in order to increase the probability of successfully meeting the needs of its Title I participating children, recommendations will be made. In those areas, if any, where the operations are found to be in direct violation of the applicable statutes, regulations or approved program provisions, corrective measures will be required within specified time limits.

C. LEA Response

The LEA will be instructed by the transmittal letter which shall accompany each report to respond to the monitoring report within 15 days after receiving it in cases where corrective measures are required. The LEA may (1) explain the procedures it will follow to have corrective action completed within 30 or less calendar days on all such citations or file an official request for a formal hearing on those requirements which it believes are improper. When no corrective actions are required, the LEA may be requested within a 30 day period to respond to recommendations included in the report.

D. Dissemination

Copies of each formal monitoring report will be mailed to the chairperson of the LEA district PAC, the local Title I program administrator and the superintendent of schools when he has so indicated on page 1 of the project application. An additional copy will be submitted to the Title I Coordinator to be available at all times for public inspection and reproduction in the SEA Title I program office for the period of time required for records retention under the General Education Provisions Act. The Title I Coordinator may provide other copies as appropriate to persons within the SEA. One copy of the "Program Summary Evaluation Report" (Appendix #4) will be attached to the copy of the monitoring report to the ESEA Title I Coordinator.

In cases where unusual problems of cross-checking and verifying of information may require more than 10 working days to complete the report, a letter shall be sent to LEA persons who are to receive the report within the ten-working-day period following the visit to appraise them of the delay and name a date by which the report may be expected, which must not be later than 45 total days following the visit.

IV. Follow-Up Activities

Depending upon the severity and extent of non-compliance or other program weaknesses, further action by the SEA may be taken.

A. Revisits

The monitoring report may require a date to be established for a revisit after corrective action has been completed by the LEA. In minor or less extensive violations, the area desk may accept the corrective action promised by the LEA, and place the LEA in the high priority list for early monitoring in the succeeding year. At the revisit a careful follow-up monitoring on the areas of non-compliance must be made.

B. Penalties

In cases of non-compliance, a committee of the Title I staff including the Title I Coordinator may, depending upon the nature and severity of the violation, assess penalties in addition to those required by law. Such penalties may include:

1. Interruption of funding pending corrections
2. Revocation of approval
3. Recovery of funds in cases of fraudulent misuse, or
4. Other activities not inconsistent with Federal law and "Title I, ESEA Policy Statements".

It is the responsibility of the Title I Coordinator to inform and consult with the Associate Director and other SEA staff who may become involved in any punitive action taken as a result of findings from a monitoring review of the Title I program.

ON-SITE MONITORING OF TITLE I ESEA PROGRAMS
LOCAL EDUCATIONAL AGENCIES - MIGRATORY CHILDREN
HANDICAPPED CHILDREN
Special Projects Unit
Colorado Department of Education

SEC. 167. Each State educational agency shall adopt standards, consistent with manimum standards established by the Commissioner and with the State monitoring and enforcement plan submitted under Section 171, for monitoring the effectiveness of programs and projects assisted under this title.

Monitoring is defined as a planned on-site review by the State Educational Agency (SEA) to a Local Educational Agency (LEA) or Board of Cooperative Educational Services (BOCES) Title I program in operation for the purposes enumerated below.

All Title I programs in the state will be monitored by the SEA staff according to the schedule considering the nature, size and complexity of the activity. The SEA will endeavor to involve not only its own staff but persons from Colorado school districts as well in the monitoring process. During monitoring visits appropriate aspects of the Title I program are examined. Areas reviewed, including source data, computations, and documentation when applicable, include selection of Title I attendance areas, needs assessment, staffing pattern, staff development, implementation of program design, criteria and procedures for selection of children, equipment inventory and usage, evaluation, parent involvement, dissemination, administration and supervision, fiscal accounting and auditing procedures and records, comparability, maintenance of effort, and services to neglected and delinquent children and to nonpublic school children.

A comprehensive report of compliance and quality factors will be completed for each program monitored, using the criteria in the SEA monitoring instrument which are a direct outgrowth of Title I regulations and program guides, including changes made by the "Education Amendments of 1978." The major purpose of monitoring is to provide assurances to the community, the state and the federal government that program operations will be in accordance with federal rules and regulations and with the projects set forth in the program application.

1.0 PURPOSES

- 1.1 To determine compliance with legal requirements
- 1.2 To determine fidelity of program operation to program application
- 1.3 To assess program quality and effectiveness

2.0 PRE-VISITATION PLANNING PROCEDURES

- 2.1 The SEA Title I staff prepares a monitoring plan for the year, which includes a listing of school districts to be monitored and tentative dates proposed for each monitoring visit.

- 2.2 An SEA Title I consultant will serve as the responsible party for each on-site monitoring visit. The consultant will be responsible for monitoring the program alone or for arranging a team visit, in which case the consultant serves as team leader.
- 2.3 Districts or BOCES to be monitored will be notified by the responsible consultant prior to the proposed visitation.
- 2.4 The visitation date will be confirmed by a letter to the LEA or BOCES in advance of the scheduled monitoring.
- 2.5 The consultant will determine the size and composition of the monitoring team required based on the size and nature of the program.
- 2.6 The consultant will contact appropriate persons from LEAs, and when appropriate, persons from other units of the Department, universities, and the State Advisory Title I Advisory Committee, to serve as members of the on-site team. Persons from the program being monitored will not serve on the team.
- 2.7 The consultant, in cooperation with the local Title I director, will develop a schedule for the visitation which may include the following:
 - 2.7.1 Orientation meeting for team members
 - 2.7.2 Overview of program
 - 2.7.3 Examination of program records
 - 2.7.4 Public and non-public schools to be visited, including names of building principals and staff to be interviewed at each school
 - 2.7.5 Meetings with Parent Advisory Council(s)
 - 2.7.6 Team discussion and summary
 - 2.7.7 Exit conference
- 2.8 The consultant will send to the local Title I director a copy of the schedule, the monitoring instrument which will include the areas to be reviewed and criteria used to make the review, and a list of materials and records which the team will need. The materials and records which the LEA should have available at the time of the review are as follows:
 1. Documentation for target-area selection
 2. Needs Assessment data
 3. Comparability data (Title I and non-Title I staffing records)
 4. Equipment inventory and current utilization
 5. Accounting and auditing procedures
 6. Parent materials and minutes of PAC meetings
 7. Inservice training materials (agendas, etc.)
 8. Dissemination materials

10. Evaluation procedures and instruments
 11. Rosters of school staff, class schedules for school and Title I staff
 12. List of participating students and basis for their selection (to be reviewed during classroom visitation)
 13. Diagnostic information and individualized plans for each child where available (to be reviewed during classroom visitation)
- 2.9 The consultant may prepare and send a visitation packet consisting of pertinent documents to each person who will serve on the monitoring team. Documents may include the following:
- 2.9.1 On-site monitoring schedule
 - 2.9.2 Program application
 - 2.9.3 Previous year's evaluation
 - 2.9.4 Previous SEA monitoring reports and LEA responses
 - 2.9.5 On-site monitoring instrument

3.0 ON-SITE VISITATION PROCEDURES

The following is designed for team monitoring. In the case of a consultant doing the monitoring alone, the same general procedures will be followed.

- 3.1 The on-site will begin with a team orientation meeting to review the schedule, make specific assignments, and provide information about how the visitation will be conducted and how to complete the monitoring instrument.
- 3.2 The Title I director will present an overview of the program, during which time the team might wish to ask questions regarding various aspects of the program.
- 3.3 The team will review the program and fiscal records delineated in 2.8.
- 3.4 The team will visit and study pre-selected projects according to the schedule.
- 3.5 The team will meet with the Parent Advisory Council(s) as scheduled.
- 3.6 Following the school visitations, and review of records, team members will meet to review, discuss, and synthesize their findings.
- 3.7 The team leader will summarize the findings and conduct an exit conference with the superintendent, the Title I director, and other local personnel if the LEA wishes to include them. The exit conference is a preliminary report, based on the findings of the visitation team and subject to revision upon further study of the data.

4.0 PROCEDURES FOR THE ISSUANCE AND RESPONSE TO MONITORING REPORTS

- 4.1 After reviewing all findings, the consultant will submit an official report to the superintendent or authorized representative within 45 days which includes the strengths, recommendations for improvement, and directives for corrective action if needed.
- 4.2 Upon receipt of the report, the LEA should respond to each of the recommendations and directives for corrective action within 30 days. The response should indicate what the LEA plans to do to meet each of the recommendations and directives in the report and when the action will be taken.

5.0 FOLLOW-UP PROCEDURES

- 5.1 The consultant assigned to the program will be responsible for follow-up on the monitoring recommendations and directives to determine if the agreed upon changes have actually occurred and when the corrective actions were taken. An SEA consultant may also make an on-site visit to verify that non-compliant practices have been corrected.
- 5.2 The consultant assigned to the program will be responsible for insuring that the results of the monitoring visit are used in the development and approval of the next year's application.

6.0 DISSEMINATION OF MONITORING REPORTS

- 6.1 The SEA will submit the monitoring report to the superintendent or authorized representative and to the chairperson of the district Parent Advisory Council.
- 6.2 The chairperson of the district's Parent Advisory Council will be responsible for sharing the report with the Council and other interested parents.
- 6.3 The LEA will be responsible for disseminating the report to the local staff, local auditors, and other interested persons.
- 6.4 The SEA will make monitoring reports available to state auditors and other interested persons upon request.

7.0 CORRECTING NON-COMPLIANT ITEMS

- 7.1 If a non-compliant item is not corrected within the specified period of time, the matter will be referred to the state federal program auditor. The state federal program auditor will refer the matter to the local auditor who will calculate the cost of the audit exception and include the exception in the audit report.
- 7.2 The state Title I office will require repayment of funds to the federal government for those items which were listed as audit exceptions by the local auditor.

NEED:

The need for an effective monitoring instrument is inherent within any good management model. This need is further reinforced by the Federal Regulation requiring this activity.

GOALS:

1. Monitor for compliance with Federal regulations
2. Monitor for program quality

STRUCTURING IDEAS:

1. This monitoring process will be completely structured by concerns about compliance with Federal Regulations and program quality. This is not an auditing process nor is it a recognition and supervision visitation.
2. This monitoring process is problem-oriented. In other words, there will be only a general review of the project if there are no indications of problem areas. If problem areas are noted only they will be dealt with in detail.
3. Usually smaller projects will be less complicated than larger so less time will usually be required to complete these visitations. There will be three types of project designations. They are as follows:
 - a. Small projects under \$30,000 where no problems are noted
 - b. Large projects over \$30,000 where no problems are noted
 - c. Large or small projects where problems are noted
4. The organization of the monitoring teams will be developed in accordance with the monitoring needs of the particular project. These needs will be determined by the Director of Title I.

PROGRAM STRUCTURES:

Diagram 1 is a schematic presentation of the program structure. Following is a detailed program process statement.

SCHEDULING PROCEDURES:

There will be two general sources of projects to be monitored. They are:

1. Normally scheduled - This will be a general review of the project.
2. Problem oriented - This will deal in depth with the problem area. There also will be a general review of the non-problem areas.

PRE-VISITATION PREPARATION:

To minimize the amount of time spent in the school districts a very thorough preparation is necessary. This will involve the collection and transmission of essential project information to the appropriate monitors. This information will be in the form of: FY 76 & FY 77 project application, comparability forms and FY 76 CIA audit. The monitors will thoroughly review this information and note concerns. This should allow the monitors to have a good idea what the project is about and what additional information they will need at the time of the visitation. In other words, little or no time will be spent on-site for familiarization purposes. The sequence of events in the monitoring process are presented in Diagram 2.

PRE-VISITATION CONTACTS OF DISTRICT:

No less than one week before the visitation the monitor will contact the district to be visited and request that any additional necessary information be provided at the time of the visitation. This requires that the monitor be prepared well in advance of the visitation. It also requires that monitoring needs be clearly defined in advance.

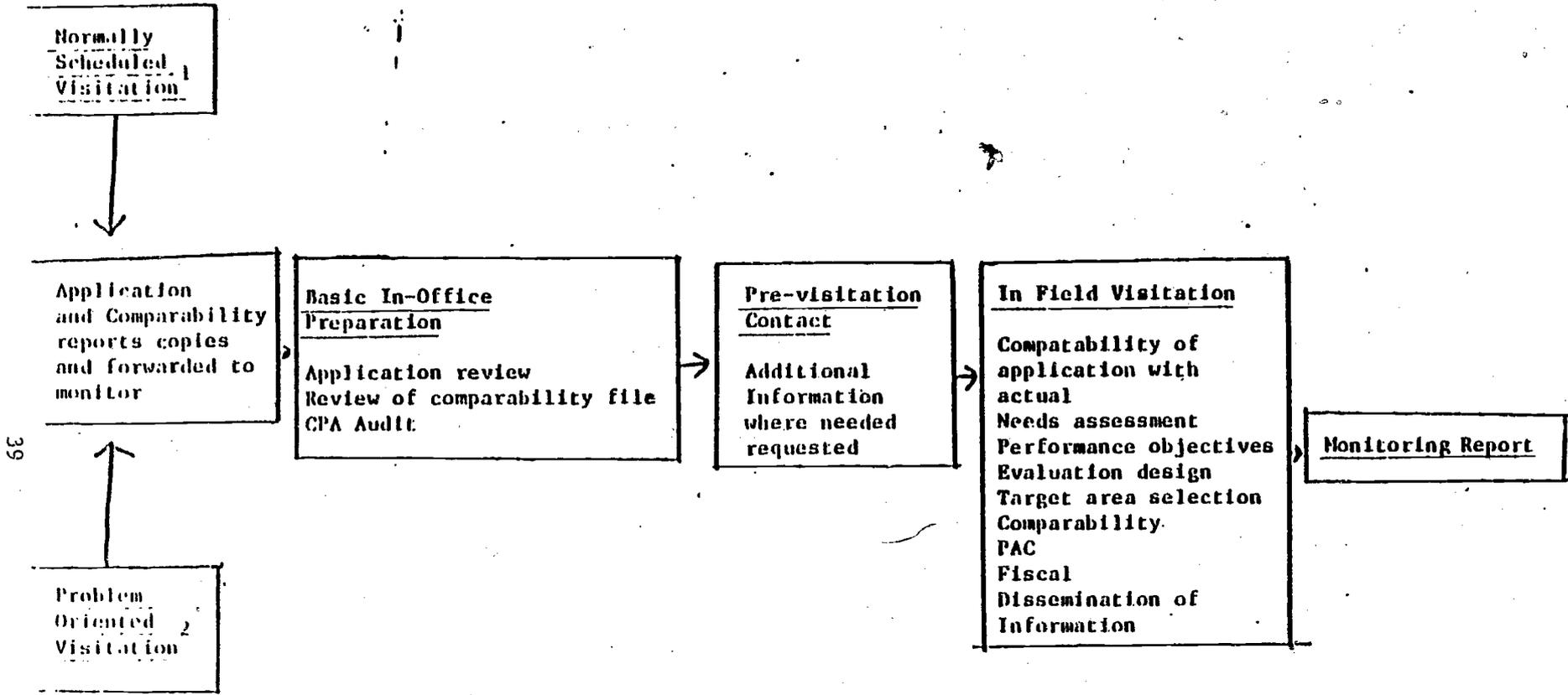
ON-SITE VISITATION:

The on-site visitation will be completely structured by the SEA Monitoring Instrument.

MONITORING REPORT:

The report, with the exception of the typing, will be completed at the end of the visitation. The maximum time between the visitation and the report to be in the file at IOE will be three weeks. The utilization of this report is schematically presented in Diagram 3.

PROCESS DIAGRAM



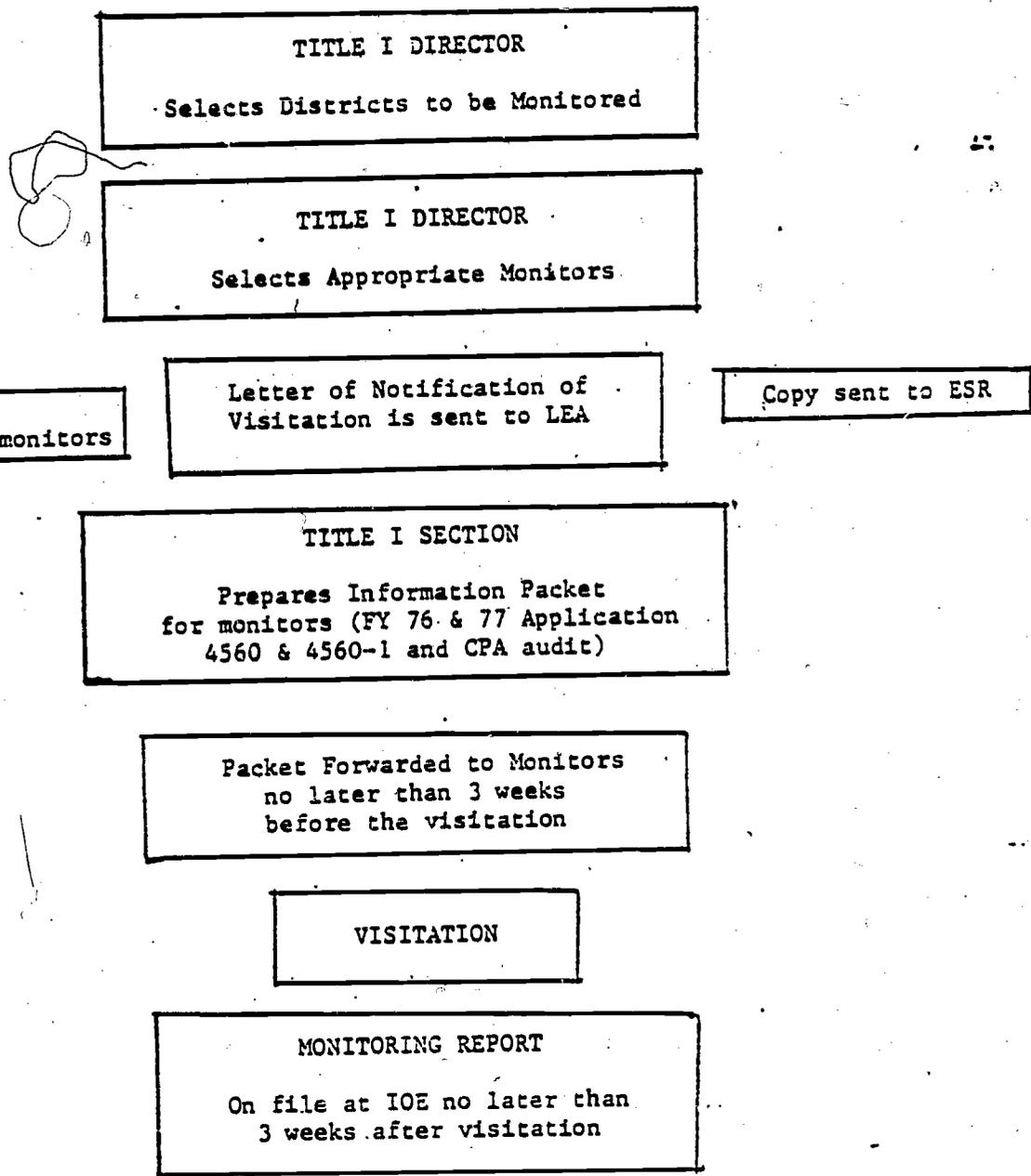
39

¹No detail work required unless problems are noted

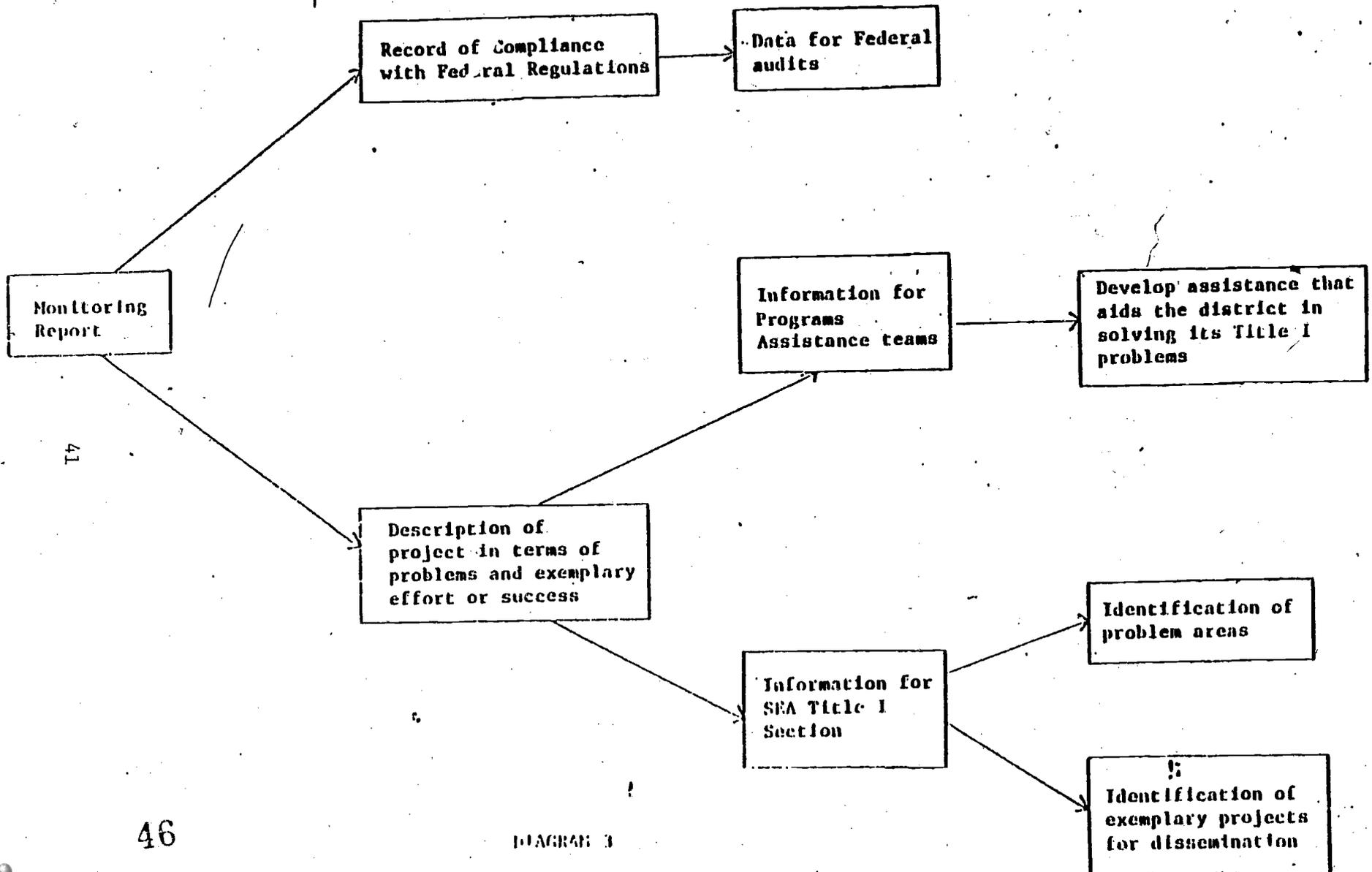
²Detailed work is only required in areas where problems are noted



SELECTION AND INFORMATION FLOW



UTILIZATION OF MONITORING REPORT



47

46

DIAGRAM 3

47

THE PROCEDURES FOR A PROGRAM REVIEW

Preparing for a Program Review

1. Determine purposes of the program reviews for the fiscal year in question, based on previous experience and available resources. The number of people to make a review should be limited so that the LEA does not feel overpowered.
2. Determine specific objectives to be achieved. The objectives should be stated in terms of observable changes which are directly related to one of the purposes of the review.
3. Within the limits set by purposes, objectives, and resources, basic decisions need to be made on the strategical design of program reviews. For instance, will a team approach be employed in making the review? The strategy to be following is also affected by such factors as the requests and problems of specific districts.
4. Establish a schedule for the year. The schedule should be flexible enough to allow for weather conditions, emergencies, illness, special purpose reviews, technical assistance and meetings. The schedule should be drawn up in advance, to guarantee the opportunity to make all of the projected reviews.
5. Plan the activities of the review team.
 - a. In-House
 - (1) Make precise assignments of personnel.
 - (2) Prepare a project digest on the basis of information contained in the project application and previous evaluation reports.
 - (3) Prepare a plan of action for the review.
 - (4) Draw up an agenda for the review.
 - (5) Brief all persons who will make the review.
 - b. In Cooperation with the LEA
 - (1) Make final arrangements for exact time of the review.
 - (2) Inform LEA of purposes and objectives of the review.
 - (3) Inform LEA of persons to make the review.
 - (4) Specify the data and documents you will want to see during the review.
 - (5) Specify the people you wish to interview.

6. The Review

- (a) Maintain a positive atmosphere.
- (b) Avoid surprises.
- (c) Adhere to purposes and objectives.
- (d) Make a preliminary report to the Superintendent and Title I coordinator.

7. A written report should be sent to the Superintendent within 30 days of the review. The report should contain positive statements concerning the strengths of the program and suggestions or recommendations for improvement. If immediate corrective action is deemed necessary, it should be clearly outlined and a specific time table should be established for the LEA to accomplish the corrective action. If necessary, a written response should be requested from the LEA within 30 days after it receives the report.

8. Follow-Up

- (a) The LEA should establish systematic procedures to incorporate the results of the review into the development of next year's application (with the SEA's assistance, if needed).
- (b) The department should outline procedures to ensure that the results of the review are considered in next year's application.
- (c) Arrangements should be made to provide technical assistance, and dissemination as indicated by the review.
- (d) The LEA should arrange to provide information concerning the review to principals, teachers, parents, private school representatives and other interested parties.
- (e) A copy of the program review letter will be mailed to the chairperson of the District Parent Advisory Council.

CHECK LIST FOR A PROGRAM REVIEW

A check list can serve as a basic working paper during the review and as a record of it afterwards. It may be used in preparing recommendations to the LEA and in planning workshops for LEA Title I personnel. The check list should be modified or expanded in accordance with the purposes of the review.

Instructions

1. Prepare a check list for the program review.
2. A program review should be considered incomplete if it does not include at least one project site while it is in action. Discussions with the superintendent, program directors, coordinator, principals, teachers, students, and parents during the reviews should reveal any discrepancies between actual operation and the proposal.
3. Each section provides a space for the person making the review to indicate his judgment. Judgments in this area should not be limited to decisions about compliance with the Law. The intent is to afford the SEA an opportunity to assist the LEA in instituting desirable policies and procedures.

District Review Guide
TITLE I/PSEN

Compliance Issues	Legislative Reference	Supporting Documents
Designating Eligible Schools	PL 95-561, Section 22	ACD count by school Census data Free milk count Attendance data Test data (educational deprivation)
Participation of Eligibles	PL 95-561, Section 123b Laws of N.Y.S. 1974, Chapter 241 Sub 10a Commissioner's Rules and Regulations of the Board of Regents 100.1(f) 103.2(c)(1), 103.2(c)(2)	Test data: standardized, FEP, DRP and competency Class lists by building, grade and priority area Written notification to parents
Requirements for Design and Implementation of Program	PL 95-561, Sections 124, 127b Laws of N.Y.S. 1974, Chapter 241 Sub 10a Commissioner's Regulations Part 149.5	Needs assessment data: standardized, FEP, DRP, competency and diagnost. test results Previous years' evaluation report Evidences of program plan- ning Evidences of dissemination
Parental Involvement	PL 95-561, Section 125 as amended by PL 96 -46 The Technical Amendments of 1979	Notification to district residents of right to serve on councils Notification to parents of right to vote for council members Minutes of meeting Attendance at meeting Records of parent confer- ences Evidences of training Evidences of involvement in planning, implementat- ion and evaluating programs
Funds Allocation	PL 95-561, Sections 126, 127a Laws of N.Y.S. 1974, Chapter 241 Sub 10a Commissioner's Regulations Part 149.3(a)	SBM ST3 Comparability reports and support data Inventory of Title I mate- rials and supplies
Fidelity with Application Guidelines	PL 95-561, Section 127b	Teacher schedules Diagnostic data Prescriptive data Commitment Student work samples

District Review Guide
TITLE I/PSEN

Compliance Issues	Legislative Reference	Supporting Documents
Complaint Resolution	FL 95-561, Section 128	Records of complaints
Non-Public School Component	FL 95-561, Section 130	Needs assessment data SBM
Instructional Staff	FL 95-561, Section 134 N.Y.S. Education Law, Section 207 Commissioner's Regulations Sections 20.7, 80.15, 80.16, 149	Staff schedules

Please prepare a list of project staff at each site by funding source and priority area.

B. Materials

1. Monitoring Checklists

The monitoring checklist is central to many states' monitoring activities. States use monitoring checklists primarily in determining compliance, however, some checklists also include monitoring for quality of service. The format and content vary from state to state according to the monitoring philosophy (e.g., monitoring is primarily to ensure compliance vs monitoring is to improve programs) and the organization of the Title I unit within the SEA. There are as many formats for checklists as there are states in the country. Numerous examples are briefly described and presented at the conclusion of this section in order to give readers an idea of this diversity.

The Kansas checklist (see Exhibit B.1.a) is brief and uses an exceptionally clear format. The Illinois monitoring checklist (Exhibit B.1.b) incorporates both a desk review of documentation and the actual onsite visitation. New Jersey uses a "consolidated" monitoring checklist. The state has both a state compensatory education program and a Title I program. Both programs in the LEAs are reviewed at the same time, using the consolidated monitoring instrument. The LEA application is also consolidated (see Exhibit B.1.c). The Delaware checklist is short and concise with regulatory references, yes/no checkoff spaces to indicate if the requirement is being met, and space for comments (see Exhibit B.1.d). Minnesota provides its monitoring checklist to all school districts that will be involved in the monitoring procedure. The state feels that one of the most desired outcomes of the monitoring process is that it will assist school districts to establish a self-monitoring and self-improvement process. The process is intended to provide useful data for planning local, regional, and state programs. A portion of this checklist (with an explanation) is included here (see Exhibit B.1.e).

Typically, states use their monitoring checklists for determining LEA compliance and fidelity to the application. More than two-thirds (69%) of the respondents in the study indicated use of checklists developed for this purpose. While 83% of the respondents indicated that they monitored for program quality, 16% of the states admitted either that they tried to monitor for program quality but had great difficulty in doing so or that they did not attempt monitoring for program quality at all. Thus, the "sufficient size, scope, and quality" provision as described in Section 124 (j) of the 1978 law created problems for some states in the area of monitoring. While definitions of size and scope of a project tended to lend themselves nicely to quantification in a monitoring checklist, quantifying quality of service appears more difficult. (See Bessey et al., 1982, for a more complete discussion of issues related to monitoring for quality.)

The "size, scope, and quality" provision remains in Chapter 1. Some states have included in checklist form items that attempt to monitor quality; this is exemplary in itself and several samples are provided at the conclusion of this section. As much as states are able to quantify quality, it is likely they will do it in conjunction with the methods they are already using: professional judgement; classroom observation; interviews with teachers, parents, or students; and examinations of teacher/aide credentials and/or instructional variables.

Utah, in an effort to increase its emphasis on monitoring for quality, includes a section in its monitoring instrument on "size, score, and quality." Monitoring for quality in Utah also includes the use of forms on which LEA personnel comment on the quality of the program. (See Exhibits B.1.f and B.1.g.)

Georgia developed a two-phase programmatic and compliance monitoring checklist. Part A of the Georgia checklist requires a composite monitoring by SEA staff of all the requirements of the 1978 legislation. SEA consultants complete Part A for each LEA receiving and expanding funds prior to project application approval. The Part B checklist includes those requirements with which the LEA must comply during the operation of the program. Consultants complete this checklist during the onsite program review. The Part B checklist contains items on program quality and is presented here as Exhibit B.1.h. Note, also, another variation on format.

Pennsylvania includes items on "size, scope, and quality" in its compliance checklist. (See Exhibit B.1.i.) In addition, the state requires each LEA to complete a program description, which also helps them to monitor for quality. (See Exhibits B.1.j and B.1.k.)

Virginia uses an observation checklist as part of its efforts to monitor for quality (see Exhibit B.1.l) and it is presented as the final example in this section.

The examples presented for this section are from:

	<u>Page</u>
a. Monitoring Report Form (Kansas)	51
b. Monitoring Checklist (Illinois)	63
c. Consolidated Monitoring Form (New Jersey)	73
d. Monitoring Checklist (Delaware)	91
e. LEA Self-assessment Form (Minnesota)	97
f. Monitoring Instrument--SEA Use (Utah)	103
g. Monitoring Instrument--LEA Use (Utah)	105
h. Monitoring Checklist (Georgia)	107
i. Monitoring Checklist--SEA Use (Pennsylvania)	115
j. Reading Monitoring Instrument--LEA Use (Pennsylvania)	117
k. Mathematics Monitoring Instrument--LEA Use (Pennsylvania)	123
l. Monitoring Checklist (Virginia)	129

KANSAS SEA MONITORING REPORT FORM

Title I of the Elementary and Secondary Education Act requires State Departments of Education to monitor Title I programs at the local level. On-site visits provide State officials with an opportunity to fulfill this responsibility and to offer educational leadership. This document contains questions related to the overall operation of Title I. It is basically oriented to the legal requirements of Title I and should serve as a guide for State and local officials to evaluate the compliance of their Title I programs.

The SEA Title I office is constantly monitoring the ESEA Title I programs. A formal on-site monitoring visit will be conducted of each Title I program at least once every two years.

The monitoring/audit on-site visit will always be scheduled in advance. Therefore, the LEA will have sufficient time for review of the monitoring/audit questions prior to the visit. The on-site visit will normally consist of an entry conference, site activities and an exit conference. The LEA should ensure that the appropriate personnel are available to answer the monitoring/audit questions, to participate in the site activities and to be involved in the entry and exit conferences.

An on-site monitoring visit by the SEA Title I staff will result in a monitoring report citing areas of compliance and noncompliance. The report will be submitted to the LEA within fifteen (15) days of the on-site monitoring visit. The report will detail the nature of any noncompliance situations and describe the necessary actions which are expected of the LEA in order to resolve the monitoring findings. Generally, the LEA is given thirty (30) days to resolve the discrepancies. In all cases, the SEA will provide technical assistance to facilitate the resolution of the monitoring findings.

Federal Regulations, 45 CFR 116.45 require an LEA to retain all Title I records for at least five years. If a Title I or other related audit is pending in the LEA, records must be retained until the audit findings are resolved. The LEA must retain required information in an orderly filing system for easy retrieval of records.

The monitoring areas include:

- (1) Target Area Selection
- (2) Needs Assessment and Student Selection
- (3) Comparability
- (4) Parent Advisory Councils
- (5) Private School Participation
- (6) Evaluation
- (7) In-Service
- (8) Dissemination
- (9) Financial Management
- (10) Staff Assignments
- (11) Equipment and Materials
- (12) Administrative

SELECTION OF TARGET AREAS

Acceptable Additional
Information
Is Needed

1. The district maintained worksheets to support the low-income figures on the application.
2. Are the sources of data adequate and the most current available?

<u>Acceptable</u>	<u>Additional Information Is Needed</u>	
_____	_____	3. Does data include information on low-income children residing in the attendance area who are: attending private schools, dropouts, residing in institutions for the neglected and delinquent?
_____	_____	4. Do the numbers and percentages of low-income children for each eligible public school attendance area coincide with the application?
_____	_____	5. If selection is based on the number method, is the estimated number of children from low-income families residing in each participating attendance area as large as the average number of such children residing in the district as a whole?
_____	_____	6. If selection is based on the percentage method, is the estimated percentage of children from low-income families residing in each participating school attendance area equal to or greater than such percentage for the district as a whole?
_____	_____	7. If a combination of the percentage and number methods is used, are the number of project areas equal to or less than the number which would be designated if only one such method had been used?
_____	_____	8. If the district states that the entire school district qualifies as a project area based upon the <i>no wide variance rule</i> , is the variation between the highest and the lowest concentration of children from low-income families equal to or less than one-third of the average percentage of children from low-income families in the district as a whole?
_____	_____	9. If selection is based on the <i>25 percent rule</i> , is there a concentration of low-income children of over 25 percent in the designated or all of the several attendance areas as provided in Section 122(a)?
_____	_____	10. The same criteria for determining low-income was used in all attendance areas.
_____	_____	11. Are any attendance areas designated <i>target areas</i> based on the provision that permits an area to be eligible if such area or school were eligible in either of the two preceding fiscal years as provided in Section 122(c)?
_____	_____	12. Has the LEA ranked all attendance centers from high to low and served all eligible attendance areas without skipping as provided in Section 122(e)?

COMMENTS:

SELECTION OF PARTICIPANTS – NEEDS ASSESSMENT

<u>Acceptable</u>	<u>Additional Information Is Needed</u>
-------------------	---

1. Lists of participants were available.
2. The most educationally deprived were selected to participate in accordance with the approved project criteria.
3. There was additional testing to support any participants selected based on teacher recommendations.
4. Is actual selection method in accordance with the project application.
5. If selection is based on a screening device, are the scores of selected Title I participants lower than the scores of non-Title I participants?
6. The participants reside in the target attendance area.
7. The instructional staff and aides are aware of the identity of the Title I participants.
8. During the school year, does the LEA periodically check the growth of Title I students and move them back to their regular class schedule if they are no longer educationally deprived.
9. Is there a district-wide master list of eligible Title I participants below the cut-off score on file at the central office ?
10. Is the LEA continuing to provide services to educationally deprived children that have transferred to ineligible areas or schools in the same year as provided in Section 123(c) ?

COMMENTS:

COMPARABILITY

<u>Acceptable</u>	<u>Additional Information Is Needed</u>
-------------------	---

1. The district worksheets used to compute comparability were available.
2. Do worksheets list staff and salaries for each target school ?
3. Do worksheets list staff and salaries for each non-target school ?
4. Are the totals of FTE staff in each target school (a) not greater than 105 percent of FTE staff average for non-target schools (b) ?
5. Are salary totals for each target school (a) not less than 95 percent of the salary average for non-target schools (b) ?

<u>Acceptable</u>	<u>Additional Information Is Needed</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

6. Procedure used by district to assure the maintenance of comparability has been reviewed.
7. Grouping of schools was in accordance with CFR 116a.26i.
8. Are the same types of activities and/or services offered under Title I also offered in the non-Title I schools with state and local funds?
9. If the same type of activity and/or service were offered in non-Title I schools with State and local funds, then determine that a comparable percent of service is offered with State and local funds in the Title I schools by applying the federal audit formula.
10. Are exclusions or inclusions of Special Education and Bilingual program students properly recorded?

COMMENTS:

PARENT ADVISORY COUNCIL

<u>Acceptable</u>	<u>Additional Information Is Needed</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

1. A building council is not required if there were not more than one (FTE) Title I staff member and more than 40 participating students in each target school.
2. If more than 40 participating students or more than one FTE Title I staff in a building and less than 75 participating students, is a duly constituted council formed? They must have at least a 3 member council composed of at least a majority of parents of participating children and elected (not appointed) by parents in each project area.
3. Target areas with at least 75 or more participating students must have a council of not less than 8 members elected by parents in each project area.
4. Is evidence available to indicate council members serve for a term of two years and may be re-elected?
5. Is evidence available to indicate officers were elected after the council was constituted and names of council members made available to the public?
6. Has a regular schedule of meetings been determined by the council?
7. Is evidence available to indicate that each advisory council has been given responsibility for advising the LEA in the planning, implementation, and

Acceptable

Additional
Information
Is Needed

evaluation of its Title I program? Is the information provided on a timely basis before the program is submitted to SEA to adequately consider the program available?

8. Is evidence available to indicate each council member has been provided, without charge, a copy of the Act, federal regulations and guidelines, and State regulations and guidelines?
9. Review minutes of the PAC meetings.
10. Has a district-wide PAC been formed and composed of PAC building council members elected to the district PAC by their respective councils?
11. Have private school officials and parents of private schools participating Title I children been afforded PAC membership?
12. Is evidence available to indicate training programs have been planned in consultation with PAC members?
13. Have council members been provided with appropriate training materials free of charge?
14. Review expenditure of Title I funds for training and other PAC activities for allowable expenditures.
15. Are parents aware of the LEA's complaint procedures?

COMMENTS:

PRIVATE SCHOOL PARTICIPATION

Acceptable

Additional
Information
Is Needed

1. Were the private school officials consulted and involved in the planning, needs assessment and type of services offered to its eligible participants?
2. Has there been a separate needs assessment conducted for the nonpublic school students?
3. Is there nonpublic representation on the PAC?
4. The participants reside in the attendance area of the target school.
5. Level of funding per student in the private school is at least equal to the public school expenditure.
6. Equipment loaned to the private school is accounted for and adequately controlled.

<u>Acceptable</u>	<u>Additional Information Is Needed</u>
_____	_____
_____	_____
_____	_____
_____	_____

7. The district has adequately managed and supervised the Title I resources used at the private school.
8. Has a private school official signed off on the nonpublic school certification?
9. Evaluation data of private school participants must be included in the LEA evaluation report.
10. Public school personnel made available to the private school on the private school's premises are available only for special services not normally provided by private schools.

COMMENTS:

EVALUATION

<u>Acceptable</u>	<u>Additional Information Is Needed</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

1. Is the evaluation design seen as an integral part of program planning?
2. Is there evidence to assure that the LEA has given due consideration to the inclusion of components designed to sustain the achievements of children beyond the school year in which the program is conducted?
3. Have the five basic procedures of implementation of Model A been followed?

USE OF A STANDARDIZED TEST

TEST AT NORMING TIME

SELECT PARTICIPANTS. THEN PRETEST FOR EVALUATION PURPOSES

USE SAME TEST FOR PRE AND POSTTESTING

FALL TO SPRING TESTING – SPRING TO SPRING TESTING

4. Are percentile test results being collected?
5. Have evaluation results from the previous year been reported to the PAC and other interested persons?
6. Have past evaluation results been utilized in the current program planning and improvements?



Acceptable Additional
Information
Is Needed

- 7. Are evaluation results reviewed in relation to program objectives?
- 8. Are the evaluation instruments used in pre/post testing the same as specified in the program application?

COMMENTS:

IN-SERVICE

Review documentation to determine if the LEA program involving aides and volunteers has, in effect, a well-developed plan providing for coordinated programs of training in which aides, volunteers and the professional staff whom they are assisting will participate together.

Acceptable Additional
Information
Is Needed

- 1. Review documentation of in-service training and interview the person responsible for in-service training.
- 2. Has in-service training been implemented?
- 3. Are in-service training activities consistent with the description in the program application?
- 4. Is in-service training supplementary to district sponsored activities?
- 5. Do aides and professionals participate jointly in sessions?
- 6. Is staff knowledgeable of the Title I program objectives and activities.
- 7. Review expenditures related to in-service for its appropriateness to the program.

COMMENTS:

DISSEMINATION

<u>Acceptable</u>	<u>Additional Information Is Needed</u>
_____	_____
_____	_____
_____	_____
_____	_____

1. Has a dissemination plan been implemented in accordance with the approved project?
2. Dissemination materials were available.
3. Has the dissemination effort, as implemented, actually informed parents and community of the Title I program?
4. Has the dissemination effort, as implemented, informed Title I staff and district personnel of program progress and the latest developments and experiments in education?
5. What sources of dissemination — local paper, radio station, in-service, visitations, consultants, etc. — are used by the LEA?

COMMENTS:

FINANCIAL MANAGEMENT

<u>Acceptable</u>	<u>Additional Information Is Needed</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

1. Is there evidence of coordination between the Title I coordinator and the fiscal office concerning expenditures, proper accounting of funds, budget limitations, and audit procedures?
2. Are current expenditures and obligations consistent with the approved budget?
3. Are past audit report recommendations being implemented?
4. Are separate accounting procedures used for carry over funds?
5. Are there internal periodic reports to assist in avoiding over/under spending in line items?
6. Has an indirect cost rate been approved and utilized?

COMMENTS:

STAFF ASSIGNMENTS

<u>Acceptable</u>	<u>Additional Information Is Needed</u>	
_____	_____	1. Has the staffing proposed in the application been filled?
_____	_____	2. Are the actual duties of employees the same as proposed in the application?
_____	_____	3. Are adequate time records maintained to verify those employees on a partial salary with Title I funds?
_____	_____	4. Are Title I personnel supplementary to the district program and do not supplant activities and services required by the district or offered to non-Title I students by state/local personnel?
_____	_____	5. Does in-service training available to Title I instructional staff provide a general overview of the Title I regulations?
_____	_____	6. Are personnel properly certified in subject and field requirements for their particular assignment?
_____	_____	7. If support personnel are employed with Title I funds, are they providing supplemental services to Title I instructional participants and not general aid?
_____	_____	8. Is there an appropriate per-pupil expenditure of at least \$300 for the school year and not more than the district per-pupil cost?

COMMENTS:

EQUIPMENT AND MATERIALS

<u>Acceptable</u>	<u>Additional Information Is Needed</u>	
_____	_____	1. Review the updated inventory list and the equipment.
_____	_____	2. Is inventory list complete?
_____	_____	3. Is each piece of equipment properly marked?
_____	_____	4. Are the items purchased (and quantity) appropriate for the type of Title I program conducted and the number of participants?
_____	_____	5. If on order, or to be ordered, will equipment arrive in sufficient time to make an impact on the current program?
_____	_____	6. Has inventory been updated to eliminate equipment no longer appropriate for the program?
_____	_____	7. Are materials supplementary to those supplied by the district?

<u>Acceptable</u>	<u>Additional Information Is Needed</u>
_____	_____
_____	_____
_____	_____

8. Are requested materials being delivered in sufficient time to make an impact on the current project?
9. Are materials and supplies used exclusively by Title I participants?
10. Review budget classification for expenditures on supplies and equipment for appropriate line item budget.

COMMENTS:

ADMINISTRATIVE

<u>Acceptable</u>	<u>Additional Information Is Needed</u>
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

1. Is evidence available to verify that teachers and school boards or comparable authority responsible to the public with jurisdiction over the schools, have been involved in the planning of Title I and will be involved in the evaluation of such program?
2. Review procedures of the LEA that will permit parents of participating children the opportunity to participate in the establishment of such programs. Parents are informed of, and permitted to make recommendations with respect to, the instructional goals of the program and the progress of their children, and such parents are afforded opportunities to assist their children in achieving such goals.
3. Review data used in determination of maintenance of effort. Information is consistent with other data reported to SEA, school lunch, 18E, financial reports.
4. Review LEA's written complaint procedures as required in Section 128.
5. If Title I staff were assigned non-instructional duties, certify that the time involved does not exceed the same proportion of total time assigned similarly situated personnel at the same site, or ten 10 percent, whichever is less.
6. Review LEA's procedures for regular internal monitoring activities that would spot present or future problems.



<u>Acceptable</u>	<u>Additional Information Is Needed</u>
-------------------	---

_____	_____
_____	_____

7. Has a regular term program been implemented if the LEA's allocation exceeds \$20,000?
8. Physical facilities are adequate for all activities.

COMMENTS:

Exhibit B-1b. Monitoring Checklist (Illinois) (page 1 of 10)

STATE BOARD OF EDUCATION
ILLINOIS OFFICE OF EDUCATION
JOSEPH M. CRONIN
STATE SUPERINTENDENT OF EDUCATION
SEA MONITORING INSTRUMENT

NAME OF LEA: _____ COUNTY _____ DISTRICT NO. _____
LEA SUPERINTENDENT _____ TITLE I DIRECTOR _____
REVIEWED BY (SEA REPRESENTATIVE (S)) _____ POSITION _____
DATE OF DESK REVIEW _____ DATE OF ON SITE VISIT _____

INSTRUCTIONS: This State Educational Agency (SEA) Monitoring Instrument is to be used on two occasions: (1) prior to the monitoring visit, as a DESK REVIEW; and (2) the instrument to be completed during the actual SEA's ON SITE VISITATION. It has a two-fold purpose: (1) to determine the existence of fidelity between the contract, (ESEA Title I Application, I.O.E. Form No. 20-06) and the actual on going Title I instructional activities and their supportive services; and (2) monitor the quality of each Title I program. These items reflect the goals of the monitoring component of the Compensatory Education, (ESEA Title I) Section, Department of Federal and State Grants, of the Illinois Office of Education.

Each user of this instrument, although it might appear to be a duplication of effort, must fully understand that it is not uncommon to discover differences between information given on the application and the actual information gained from visiting an on going Title I program at a local educational agency (LEA). With this in mind, both the DESK REVIEW and the ON SITE VISITATION portions of this Monitoring Instrument must be completed. Use additional attachments if necessary.

Part I - Application File

	<u>AS WRITTEN DESK REVIEW</u>	<u>IN ACTUALITY ON SITE VISIT</u>
A. Certification by board (page 21)	Yes ___ No ___	Yes ___ No ___
B. Date certified by board	_____	_____
C. Superintendent's signature	Yes ___ No ___	Yes ___ No ___
D. Date of Superintendent's signature (Sequence)	Yes ___ No ___	Yes ___ No ___
E. Maintenance of Fiscal Effort Statement Fiscal Effort within 5% tolerance If answer is no, explain reason briefly:	Yes ___ No ___ Yes ___ No ___	Yes ___ No ___ Yes ___ No ___
F. Number of eligible (number used for grant) children in district (page 2; #2)	_____	_____
G. Number of public schools	_____	_____
H. Number of private schools with children living in district	_____	_____



- I. Source for determining number from low-income families
- 1. U.S. Census Bureau _____
 - 2. Aid for dependent children _____
 - 3. Foster children (DCFS) _____
(Explain and document) _____
- J. Number of low-income (used for establishing target schools) - children in district _____
- K. Concentration of children from low-income families (may use LEA's criteria) (page 2; 4.B) _____
- L. 1. Information used to determine target areas correct Yes ___ No ___ Yes ___ No ___
2. Applied uniformly Yes ___ No ___ Yes ___ No ___
- I. Program period:
Beginning Date Day ___ Mo. ___ Yr. ___ Day ___ Mo. ___ Yr. ___
Ending Date Day ___ Mo. ___ Yr. ___ Day ___ Mo. ___ Yr. ___
- N. Number of children participating _____
- O. Regular school program? Yes ___ No ___ Summer? Yes ___ No ___ Both? Yes ___ No ___
- P. Statement of assurance is included Yes ___ No ___
(page 20)

Part II - Administrative

- A. Central office staff:
- 1. Administrative staff
 - (a) Full time director Yes ___ No ___ Yes ___ No ___
 - (b) If not full time, report Other source of funding _____
(1) FTE % Title I _____
(2) Other Federal _____
 - B. Review of Director's Contract (agrees with FTE) Yes ___ No ___ Yes ___ No ___
 - C. Director job description (page 5 of application) Yes ___ No ___ Yes ___ No ___
 - D. Full time (if no, list other duties)
 - (a) Duties agree with job description Yes ___ No ___ Yes ___ No ___
 - E. Other Administrative Staff supporting Title I Program
 - 1. Title I Funds - number _____
 - 2. - Name of Person(s) _____ Duties _____

- (use attachment if necessary)
- F. Other Title I LEA personnel Yes ___ No ___ Yes ___ No ___
- G. Number of persons _____
Name of Person _____
Title _____



H. Size of program justifies administrative cost
 Comments: Yes ___ No ___ Yes ___ No ___

I. Supervision appears excessive
 Comments: Yes ___ No ___ Yes ___ No ___

- (1) Supervisory
- (2) Teachers
- (3) Clerical

J. Inventory: Yes ___ No ___ Yes ___ No ___

- (1) Title I equipment
 - (2) Properly labeled
 - (3) Used according to Title I regulations
- If no, comment:

- (4) Inventory Continued
 - (a) Date of Purchase _____
 - (b) Description _____
 - (c) Cost _____

(5) New equipment is needed for Title I (Current program) Yes ___ No ___ Yes ___ No ___

K. Fiscal Review (1) Fiscal records are accessible Yes ___ No ___

(2) The project director is familiar with the budget Yes ___ No ___

(3) The fund flow from state is normal Yes ___ No ___ Yes ___ No ___

(4) Funds are being obligated on time Yes ___ No ___ Yes ___ No ___

(5) Funds are encumbered appropriately Yes ___ No ___
 If no, explain:

A. No encumbrance before approval date Yes ___ No ___

(6) Monthly accounting reports (IOE 50-64) have been submitted for the appropriate periods Yes ___ No ___ Yes ___ No ___

(7) Disburse for allowable expenses _____ Yes ___ No ___

A. Salaries _____

C. Transportation _____

D. Other _____

(8) The amount of carry-over funds available \$ _____ \$ _____

(9) Total amount budgeted for equipment \$ _____ \$ _____

(10) Total amount encumbered for equipment \$ _____ \$ _____

(11) Equipment has been delivered
If no, explain:

Yes ___ No ___

(12) Compare actual expenditures
with proper budget line items

Yes ___ No ___

Yes ___ No ___

L. System-wide PAC's

(1) There is a system-wide PAC

Yes ___ No ___

Yes ___ No ___

(2) Number of members

(3) Number of members who are
parents of participating children

(4) Meeting dates

Yes ___ No ___

(5) Minutes of meeting on file

Yes ___ No ___

(6) Minutes distributed to members

(7) Each eligible attendance center
represented on system-wide PAC

(a) The LEA supports PAC's
financially

Yes ___ No ___

Yes ___ No ___

(b) Total cost of PAC support

\$ _____

\$ _____

(c) The average expenditure per
PAC member

\$ _____

\$ _____

(d) There is an established
grievance procedure

Yes ___ No ___

Yes ___ No ___

(e) Information is disseminatd
to parents on a regular basis
as needed?

Yes ___ No ___

Yes ___ No ___

(f) Number of PAC members

(g) Non-public participation?

Yes ___ No ___

Yes ___ No ___

M. In-Service Education

(1) Special inservice education
program for Title I personnel

Yes ___ No ___

Yes ___ No ___

(2) Dates conducted

from ___ to ___

(3) Joint inservice with teachers
and aides

Yes ___ No ___

Yes ___ No ___

(4) Inservice for special Title I
personnel

Dates conducted

(5) Title I inservice for school
administrative personnel

Yes ___ No ___

Yes ___ No ___

N. Comparability

(1) System is in compliance with
comparability requirements

Yes ___ No ___

Yes ___ No ___

If no, comment:

O. Preliminary assessment of needs
documentation used in assessing
needs is on file in the Director's
office

Yes ___ No ___

Yes ___ No ___

P. Two or more sources of data were
used in assessing needs

Yes ___ No ___

Yes ___ No ___

Q. At least one source of assessment was objective data
Persons involved in assessing needs:

- (1) Classroom teacher(s)
- (2) Title I teacher(s)
- (3) Aid(s)
- (4) Aid(s)
- (5) Title I Supervisory Personnel
- (6) Supervisor component program (non-Title I)
- (7) Others (please list)
- (8) _____
- (9) _____
- (10) _____
- (11) Survey instruments used

Yes ___ No ___

Needs assessment data is on file in the Title I teacher's station

Yes ___ No ___

Yes ___ No ___

The educational plan for each project participant is congruent with identified needs

Yes ___ No ___

Yes ___ No ___

Performance objectives for the project participants reflect the assessed needs

Yes ___ No ___

Yes ___ No ___

R. Evaluation

(1) Evaluation plan related to objectives

Yes ___ No ___

Yes ___ No ___

(2) Evaluation reports are on file

Yes ___ No ___

Yes ___ No ___

S. Supportive Services (Title I Support)

(1) Supportive services utilized include:

(2) Approximate percent of total grant funds used for supportive activities (including staff)

(3) The supportive services are supplementary and effective instructional in the Title I program as identified in the project narrative

Yes ___ No ___

Yes ___ No ___

T. Monitoring

(1) The monitoring program is adequate

Yes ___ No ___

Yes ___ No ___

(2) Program monitoring is conducted by Title I officer

Yes ___ No ___

Yes ___ No ___

(3) There is a feed back system operating from the school level to the central office

Yes ___ No ___

Yes ___ No ___

Part III - TARGET SCHOOL LEVEL REVIEW:

Name of School _____

Grade Range _____

Grades Served by Title I _____

1. Is a copy of the Title I application on file in the principal's office? Yes ___ No ___ Yes ___ No ___
2. Does the principal understand the nature of the Title I program? Yes ___ No ___ Yes ___ No ___
 Comments: _____
3. Is there a list of Title I personnel? Yes ___ No ___ Yes ___ No ___
4. Is there a schedule for Title I personnel? Yes ___ No ___
5. Is the equipment in place? Yes ___ No ___
6. Is the equipment being utilized properly for eligible participants only? Yes ___ No ___
7. Is the equipment properly marked? Yes ___ No ___
8. Is the disposition of old equipment occurring on schedule, if necessary? Yes ___ No ___
9. Are Title I teachers knowledgeable of the purposes of Compensatory Education and the State guidelines? Yes ___ No ___
10. Are participating children clearly identified according to selective criteria? Yes ___ No ___
11. Sources used to identify eligible children include: (on site)
 A. _____
 B. _____
 C. _____
 D. _____
12. Is objective data on file at the teacher station to justify the diagnosis and prescriptions of participating children? Yes ___ No ___
13. Is there a workable relationship between regular teachers and Title I teachers? Yes ___ No ___
14. Briefly describe the efforts to bring about a more effective working relationship between the two staff: (on site only)
15. Are Title I teachers and aides certified in the areas in which they are assigned? Yes ___ No ___

16. Are Title I teachers' credentials equal to or exceed the regular staff? Yes ___ No ___
17. Is the participating child receiving the full benefits of the Compensatory Education Program? If not, comment: Yes ___ No ___
18. The ESEA Title I program does not represent "a school within a school" appearance (eg. Self contained classroom)? Yes ___ No ___
19. Has the principal developed and coordinated efforts between Title I and regular programs? Yes ___ No ___
20. Does schedule and size of groups allow for sufficient time for individualized compensatory activities? Yes ___ No ___
21. Teachers' records indicate:
 (1) individualized planning and
 (2) evaluation for each child
 Yes ___ No ___
22. Is modification of treatment of activities made periodically? Results, observations, tests, etc.; How? Results Yes ___ No ___
23. Are appropriate methods and materials being utilized to meet objectives? Yes ___ No ___
24. Are supplies and equipment adequate to implement the program? Yes ___ No ___
25. Are facilities adequate to implement the program? Yes ___ No ___
26. Are treatment activities consistent with performance objectives in the proposal? If not, explain: Yes ___ No ___
27. Were members elected by parents in a public election? Yes ___ No ___
28. Are regular meetings held, at least three times a year? How many PAC meetings per year? Yes ___ No ___
29. Are minutes of the meetings on file at school? Yes ___ No ___
30. Is the PAC actively involved in the planning, operation, and evaluation of the Title I project? Yes ___ No ___

- 31. Is PAC furnished copies of Guidelines, evaluation reports, progress reports, etc., as may be needed for their effective involvement in Title I activities? Yes ___ No ___
- 32. Are parents regularly informed about Title I activities (newsletters, reports, etc.)? Yes ___ No ___
- 33. Are parents regularly informed and consulted about services provided their child, their child's progress, and ways they can assist their child in maximizing the benefits those services are intended to provide? Yes ___ No ___
- 34. Are parents of non-public school children members of PAC? Yes ___ No ___

Part IV - SUMMARY OF REVIEW (To be completed after (except 4) on-site visitation)

- 1. All known violations have been identified? Yes ___ No ___ Yes ___ No ___
- 2. The local system has been informed of each violation or will be notified in writing? Yes ___ No ___ Yes ___ No ___
- 3. Date of written notification by SEA Personnel _____ _____
- 4. Does this appear to be an exemplary program? If yes, explain: Yes ___ No ___ Yes ___ No ___

Signature _____

Date of Desk Review _____

Signature _____

Date (after on-site visit) _____

Signature of Assistant Director of Compensatory Education (ESEA Title I) Section,
Department of Federal and State Grants, Illinois Office of Education

Signature _____

Date (after on-site visit) _____

Comments:

Signature of Director of Compensatory Education (ESEA Title I) Section, Department
of Federal and State Grants, Illinois Office of Education

Signature _____

Date (after on-site visitation) _____

Program Assistance Team Notified (after visit) Yes ___ No ___ Yes ___ No ___

Date of Notification _____

Comments:

Documentation should be on file for each of the listed items. The district may wish to maintain a separate folder for each item.

1. Data on selection of eligible attendance areas. Include data from private schools if applicable. 116.20(p.42917)*
2. The budget and financial records system. 116.42c(p.42906)*
3. Needs assessment data: Information from standardized tests and surveys. 116a.21(p.42918)*
4. Data to support the priority ranking of needs. 116a.21(a)(b)(p.42918)*
5. Documentation for any supportive services being provided with Title I funds. 116.40b(p.42906); 116a.21a,f(p.42918)*
6. Documentation concerning performance objectives for each phase of the project. 116a.22b(p.42918)*
7. Pretest information. 116.47(p.42907)*
8. The criteria used by the district for selecting participants. 116a.21(d)(e)(p.42918)*
9. Individual records of participating children. 116.47(p.42907) 116a.21f(p.42918)*
10. The school's plan for evaluation. 116.43(p.42906)*
11. Previous year's project evaluation and how it affected program planning for the current year. 116.43(p.42906)*
12. Information on plans for inservice training for professional and paraprofessional personnel. 116.36(p.42906)*
13. Evidence of dissemination of information concerning the project within the district and to the community. 116.44(p.42907)*
14. Data on participation by private schools. 116a.23(p.42919)*
15. The list of parent council members and records of meetings. (The evaluation team will interview representative parents of children participating in a program). 116a.25(p.42920)*
16. Information on the role of parents in program planning and implementation. 116a.25(p.42920)*
17. The Comparability Report and supporting data. 116a.26(p.42921)*
18. The most recent audit, internal CPA. 116.42c(p.42906)*
19. Job descriptions for administrators, supervisors, teachers, and aides. 116.40(p.42906)*
20. Certification records for Title I staff. (School Code, State of Illinois)*
21. Equipment inventory. 116.42(p.42906)*
22. Revisions and amendments, if any.
23. Financial records to support the maintenance of fiscal effort from State and local funds. 116.19(p.42905)*

*Reference is the Federal Register, September 28, 1976, which has been distributed to all school districts and Educational Service Region Superintendents.

STATE OF NEW JERSEY - DEPARTMENT OF EDUCATION
 Division of School Programs
 Bureau of Title I/Migrant, ESEA

(For State Use Only)

FY 81 MONITORING REPORT

DISTRICT _____ COUNTY _____ DATE _____

SEA REPRESENTATIVES _____

	Part A (31)	CONCEN (31)	CO (80)	Reallocation (80)	Other spec.	Total
Amount						
Parti- cipants						

LEA PERSONNEL INTERVIEWED:

PROGRAM AREAS REVIEWED	Title I Parts A & B	COMMENTS
1. BASIC DATA		
2. NON-PUBLIC INVOLVEMENT		
3. PARENTAL INVOLVEMENT		
4. NEEDS ASSESSMENT		
5. PROGRAM ACTIVITIES:	Public Non-Public Neg. & Del.	
6. SUPPORTIVE SERVICES		
7. INSERVICE ACTIVITIES		
8. DISSEMINATION		
9. PROGRAM OPERATION/ IMPLEMENTATION		
10. EVALUATION DESIGN		
11. FISCAL:	Audit Inventory Comparability	



BASIC DATA

Is documentation available to verify:

1. School residents data sources for compiling the total resident children; (p. 4, item A 5 and P. 2, item 2) Sec. 122
2. The primary and secondary sources checked for determining the number of children from low income families, (p. 3, item D Sec. 122
3. The use of weighted factors in determining the eligible attendance areas. Sec. 122
4. The determination of eligible attendance area(s). (Underline appropriate one(s) Page 3. Sec. 122

: Total Number Enrollment (District District as a Whole	NWV Free Lunch Enrollment (School) Previous Year(s)
--	--

C	NC	Type of Documentation

NON-PUBLIC INVOLVEMENT

Is documentation available to verify:

1. The consultation and planning arrangements with non-public school representatives reported on page 4, item 1. Sec. 130(a)
2. The information reported in item 11, page 4 regarding recommendations.
3. The information reported in item 11, page 4 for recommendations not adopted.
4. The involvement of the non-public school personnel reported in item 1, page 4.
5. Are there equitable special educational services and arrangements. Sec. 130(a)

RECOMMENDATIONS/COMMENTS

STATE THE AREAS NEEDING TECHNICAL ASSISTANCE

3. DETERMINATION OF SPECIAL NEEDS

Is documentation available to verify:

1. All students elected to participate in each project area were assessed to determine their special needs in the cognitive, affective, psychomotor, social health areas (p. 16) Sec. 124 (b) (3)

LANGUAGE EXPERIENCE	PIP	COMPUTATIONAL SKILLS	PRE-K	KINDERGARTEN	TYPE OF DOCUMENTATION

RECOMMENDATIONS/COMMENTS

STATE THE AREAS NEEDING TECHNICAL ASSISTANCE

SUPPORTIVE SERVICES

Is there documentation to verify:

1. The total number of children receiving Title I supportive services. (p. 16) Sec. 123 (a) and 124 (a)(b)
2. The implementation of supportive services as stipulated. (p. 16)
3. Each child receiving Title I funded supportive services is participating in at least one of the instructional projects. Sec. 124 (a)(b)
4. The identification of individual needs of participating students receiving supportive services. (p. 19) Sec. 124(e)
5. An effort, in each case, to utilize other resources for supportive services prior to using Title I funds. Sec. 121 and Sec. 124(f)(1)
6. The implementation of supportive staff responsibilities as described in the application. (p.17) Sec. 121

LANGUAGE EXPERIENCE	COMPUTATIONAL SKILLS	PRE-K	KINDERGARTEN	TYPE OF DOCUMENTATION

TO THE REVIEWER: Enter type of service provided.

RECOMMENDATIONS/COMMENTS

STATE THE AREAS NEEDING TECHNICAL ASSISTANCE.

DISSEMINATION

Is documentation available to verify:

1. Dissemination plan as outlined has been implemented. (pp. 9, 19) Sec. 125(c)(1)(2) Sec. 127(c), 193(h)
 Yes _____ No _____
3. Information has been provided for parents whose dominant language is not English.
 Yes _____ No _____
4. Information has been disseminated to teachers and administrator on the latest developments and experiments in education. (p. 19) Sec. 124 (a) and (1)

C	NC	TYPE OF DOCUMENTATION

RECOMMENDATIONS/COMMENTS

STATE THE AREAS NEEDING TECHNICAL ASSISTANCE

C	NC	TYPE OF DOCUMENTATION

5. If an outside sub-contractor is responsible for the evaluation of the Title I Program, is there evidence of:
- (a) A Request for Proposal or a description of activities in instances where "sole source" agreement exist.
 - (b) An approval letter from the SEA
 - (c) A Contract for Services
 - (d) SEA Approval Letter for Contract
 - (e) Evidence that the sub-contractor is meeting the responsibilities as outlined in the proposal and contract.
6. Has evaluation model been implemented?

EVALUATION

RECOMMENDATIONS/COMMENTS

STATE THE AREAS NEEDING TECHNICAL ASSISTANCE

Exhibit B-1c. (page 14 of 17)

- 9. The meeting when the general public was given an opportunity to present its views regarding the current application. (date of meeting _____). (p. 7 item C). Sec. 127(c)
- 10. List of Parent Council that will function during the current year. (p. 8)
- 11. Parent Council training programs as outlined have been implemented. (p. 9) Sec. 125(d)

C	NC	TYPE OF DOCUMENTATION

RECOMMENDATIONS/COMMENTS

STATE THE AREAS NEEDING TECHNICAL ASSISTANCE

FISCAL

13. Has Reimbursement to State of New Jersey-Pension and Social Security (Schedule A and B) been filed? Sec. 124(m)
14. Are payments supported by adequate evidence of the delivery of goods or performance to services? Sec. 124(m)
15. Have all Free Balances per ESEA-I Final Financial Report and Audit Liquidation Schedule been refunded? Sec. 124(m)
16. Do the Board minutes show the date and formal action designating authorized representative of LEA for program application? Sec. 124(m)
17. Do Board minutes show approval of the Title I program? Sec. 124(m)

C	NC	TYPE OF DOCUMENTATION

Part A

Carry-over
Impact Aid.
Reallocation

RECOMMENDATIONS/COMMENTS

STATE THE AREA NEEDING TECHNICAL ASSISTANCE

MIN-STANDARD ENGLISH

Is documentation available to verify:

1. The methods and dates of Assessment to determine English Language Proficiency. (p. 11, Col. B) Sec. 124 (m)
2. The method of determining Standard Level of English Language Proficiency. (p. 11, Col. C) Sec. 124 (m)
3. The number of students at or above Standard Level of English Language Proficiency. (p. 11, Col. D). Sec. 124 (m)
4. The number below Standard Level of English Language Proficiency. (p. 11, Col. E) Sec. 124 (m)
5. If an ENGLISH AS A SECOND LANGUAGE Project is being conducted, is there documentation that the students were assessed to determine their COGNITIVE NEEDS in that area (ENGLISH LANGUAGE PROFICIENCY)
6. If a BILINGUAL Project is being conducted, is there documentation that the student were assessed in both the English Language and their Native Language.

C	NC	TYPE OF DOCUMENTATION

RECOMMENDATIONS/COMMENTS

STATE THE AREAS NEEDING TECHNICAL ASSISTANCE

Exhibit B-1d. Monitoring Checklist (Delaware) (page 1 of 6)

MONITORING CHECKLIST - E.S.E.A. TITLE I

LEA/SA: _____ Date of Visit: _____

Project Title: _____

Project Director: _____

Members of Monitoring/Evaluation Team (Circle One):

Regulatory Reference	Item	Yes	No	Comment
§ 126 (c)	Does the project utilize federal funds to supplement and not supplant the regular school program?			
§ 124	Is the project being operated in accordance with the approved project application?			
§ 127 (a) (b) (c)	Is the LEA submitting the required reports? Does the LEA keep adequate records which fully disclose the amount and disposition of Title I funds and such other records as will facilitate an effective audit?			
§ 122	Is the project operating at the designated target schools? Are data available to verify target school selection? Are only eligible schools being served?			

Regulatory Reference	Item	Yes	No	Comment
<p>§ 123 124(b)</p>	<p>Has a satisfactory needs assessment been done for the current year?</p> <p>Are data available to justify the current years' program?</p> <p>Does the needs assessment identify educationally deprived children in all eligible attendance areas?</p> <p>Are the selected children those with the greatest need for special assistance?</p> <p>Are the general instructional areas defined?</p> <p>Have specific educational needs been determined?</p>			
<p>§ 126(e)</p>	<p>Does the LEA meet comparability requirements:</p>			
<p>§ 127(c)</p>	<p>Does the LEA make the application and all pertinent documents related thereto available to parents, teachers, and other members of the general public?</p>			
<p>§ 125(a)</p>	<p>Is there a district-wide PAC?</p>			
<p>§ 125</p>	<p>Are there local school PACs where necessitated by law?</p>			
<p>§ 125</p>	<p>Are there eight council members who have been elected by parents for two year terms?</p>			
<p>§ 125</p>	<p>Have Council Officers Been elected?</p>			
<p>Sept. 28, 1976 Federal Register</p>	<p>Does the LEA have evidence to indicate that parents have consented to have their name used in PAC activities?</p>			

Regulatory Reference	Item	Yes	No	Comment
§ 125	Are there a sufficient number of meetings per year?			
Sept. 28, 1976 Federal Register	Does the LEA have documentation that all parents in each eligible attendance area have been given the opportunity to elect PAC members?			
§ 125	Are meetings held on schedules and at locations determined by the PACs?			
§ 125	Have elections of members of PAC groups been conducted as planned?			
§ 125	Have the necessary documents been provided without charge to council members?			
§ 125	Have councils been involved in the planning, implementation, and evaluation of the program?			
§ 125	Is the training program described in the project being implemented?			
§	Has each member of each Council been provided with appropriate training materials?			
§	Does the district have documentation that advisory council members were consulted in the establishment of training programs?			
§	Has the district developed written procedures for the resolution of complaints?			
§ 124(h)	Has the district disseminated significant information to teachers and administrators derived from educational research, demonstration and similar projects?		93	95

Regulatory Reference	Item	Yes	No	Comment
§ 128(4)	Has the LEA provided for the dissemination of the resolution of complaints?			
§ 127(a)	Does the LEA maintain an adequate inventory of materials and equipment? Have all project staff positions listed in the approved project been filled?			
§ 134	Does the LEA have documentation that personnel paid totally from Title I funds spend no more than 10% or no more than a regular school employee spends (whichever is less) of their time in certain limited, rotating, supervisory duties not related to classroom instruction?			
§ 124(1)	Has the LEA provided inservice training to project staff?			
§ 124(d)	Is the program as currently operated of sufficient size, scope, and quality to give reasonable promise to substantial progress toward meeting the special educational needs of the children being served?			
§ 123	Are funds allocated to eligible schools based on the numbers and needs of children to be served?			
§ 124(f)	Can the LEA document that it has taken into consideration benefits and services which are or may be available through other public or private agencies, organizations, or individuals?			
§ 124(i)	Can the LEA document that teachers and school board members have been involved in the planning and evaluation of the program?		94 96	

Regulatory Reference	Item	Yes	No	Comment
§ 124(g) (2)	Does the LEA evaluation plan include the collection and analysis of data relating to the degree to which the program has achieved its goal?			
§ 124(g) (2)	<p>Has the LEA made provisions that will measure educational achievement over at least a twelve month period?</p> <p>Are the results of evaluations being utilized in planning for and improving projects and activities carried out under this title in subsequent years?</p>			
April 4, 1978 Federal Register § 11bc.12	Does the LEA have procedures which can be used to determine the special educational needs of program participants?			
April 4, 1978 Federal Register § 11bc.12	Has the LEA identified those program participants with the most serious educational needs?			
April 4, 1978 Federal Register § 116c.12	Has the LEA adapted Title I services to address the identified needs?			
§ 130(a)	Are services rendered to private schools on an equitable basis?			
§ 130(a)	Has the LEA developed an appropriate mechanism for acquiring input from the private school sector?			
§ 130(a)	Has the LEA made provisions for including special educational services and arrangements in which private school children can participate?		95	

Regulatory Reference	Item	Yes	No	Comment
§ 130	Does the LEA have documentation of contacts with private schools?			
§ 125	Have private school representatives been given the opportunity to serve on PAC groups?			
§ 130	Are expenditures equitable (taking into consideration the number of pupils in private schools) to expenditures for children enrolled in public schools?			

MANUAL GUIDE

Exhibit B-1e. LEA Self-assessment Form (Minnesota) (page 1 of 5)

COMPLIANCE CRITERIA	METHOD(S) USED TO ESTABLISH CRITERIA
<p>110 A plan has been approved and implemented for the program development, program coordination, program evaluation, in-service training and individual supervision of any personnel employed at level 3 in a special unit or psychology program serving special education.</p> <p>MINN. STAT. § 122B.0130</p>	<p>.10 Copy of approved plan.</p>
<p>120 Any deviations from the normal school day for any handicapped child without a medical statement signed by a physician on file in which student record has approval from the Commissioner of Education.</p> <p>MINN. STAT. § 122B.0130</p>	<p>.10 List of arrival and departure times for handicapped students. Copy of any approval notices from the Commissioner of Education for handicapped students whose program deviates from the normal school day and there is no medical statement on file.</p> <p>.40 Staff interview.</p> <p>.50 Parent interview.</p>
<p>130 At least once each year the success of each special education program in helping students achieve the goals of their IEP's is evaluated using methods described in the school district's annual application for funds.</p> <p>MINN. STAT. § 122B.0130</p>	<p>PROGRAM EVALUATION</p> <p>.00 Monitoring Team obtains a copy of approved application for Part B funds.</p> <p>.10 Copy of special education in-house evaluation report for last year (not Program Monitoring Report).</p>

Compliance criteria statements developed from state and federal regulations.

Citation taken from state law/regulation. (Right hand margin)

Citation taken from federal law/regulation. (Left hand margin)

The following coding system was used to categorize the data gathering methods used to establish compliance:

- .00 Pre-On-Site
Monitoring team will review documentation previously submitted to SDE by district as part of application or other program reporting documents.
- .10- Documentation the monitoring team will review on-site.
- .19 monitoring team will review on-site.
- .20 On-site student record review by monitoring team.
- .30 On-site observation of program operation by monitoring team.
- .40 On-site interviews with staff and administration by monitoring team.
- .50 On-site or phone interviews with parents by monitoring team.

THE MAJOR PRE-ON-SITE PREPARATION BY THE LEA:

Assemble all documentation to be reviewed (Categories .10 - .19 during the monitoring visit).

TITLE I
I. USE OF FUNDS

Exhibit B-1e. (page 2 of 5)

COMPLIANCE CRITERIA

METHOD(S) USED TO ESTABLISH CRITERIA

PURPOSE

1 Title I funds are being used for programs and projects designed to meet the needs of educationally deprived children.

.00 Review and approval of application and/or addendum for funds by SEA.

.10 Review addendum.

124(a)

ADMINISTRATION OF FUNDS

2 The local educational agency maintains administrative control and title to all property purchased with Title I funds. Equipment may be placed in private school premises only when:

.10 Review equipment inventory.

a. The local educational agency assures that equipment is being used solely for project purposes;

b. The local educational agency removes any equipment when it is not being used for the project or is no longer needed for the project.

116.42(b) P.L. 95-561

3 Equipment is used in the project or program for which it was acquired as long as needed, whether or not the project or program continues to be supported by Federal funds. When no longer needed for the original project or program the equipment is transferred under 74.136 or used in other projects or programs currently or previously sponsored with Federal funds.

.00 Review and approval of application for funds SEA.

.30 Observation of placement and use of equipment.

(45 CFR Part 74)
74.137(a)

102

COMPLIANCE CRITERIA	METHOD(S) USED TO ESTABLISH CRITERIA
<p>4</p> <p>Disposition of equipment: Equipment shall be disposed of in accordance with Federal regulations governing the administration of property.</p> <p>(45 CFR Part 74) 74.139 (a) 74.140 (e)</p>	<p>.00 Review application approved by SEA for status of equipment.</p>
<p>5</p> <p>66</p> <p>Property records for Title I equipment are kept up-to-date and provide for:</p> <ul style="list-style-type: none"> a. Inventory of tangible personal property having a useful life of more than one year and acquisition cost of \$300 or more per unit; b. Description of the equipment, including manufacturer's model number (if any); c. An identification number (such as the manufacturer's serial number); d. Identification of the grant (Title I) under which the equipment was acquired; e. Acquisition date and unit acquisition cost; f. Location use and condition of the equipment and the date the information was reported; g. All pertinent information on the ultimate transfer, replacement or disposition of the equipment; h. The title and administrative control over all equipment placed on private school premises being retained by the public agency. <p>(45 CFR Part 74) 74.132 74.140 (a) 116.42 (a)</p>	<p>.10 Copy of Title I property required records. Review to determine if required information is included and up-to-date.</p>

COMPLIANCE CRITERIA	METHOD(S) USED TO ESTABLISH CRITERIA
<p>6 A physical inventory of equipment purchased with Title I funds has been taken and the results reconciled with the property records at least once every two years to verify the existence, current utilization, and continued need for equipment.</p> <p>(45 CFR Part 74) 74.140(b)</p>	<p>.10 Review of most recent results of physical inventory of equipment.</p>
<p>7 A control system is in effect to insure adequate safeguards to prevent loss, damage or theft of the equipment purchased with Title I funds.</p> <p>(45 CFR Part 74) 74.140(c)</p>	<p>.10 Review of equipment page in LEA application and inventory record on sheet.</p> <p>.30 Observation of placement of equipment.</p> <p>.40 Interview with staff person responsible for insuring adequate safeguards.</p>
<p>8 Adequate maintenance procedures have been implemented to keep any equipment purchased with Title I funds in good condition.</p> <p>(45 CFR Part 74) 74.140(d)</p>	
PAYMENT TO TEACHERS	
<p>9 Project expenditures for staff salaries are the same as indicated on the budget analysis of the approved day in Title I activities as specified.</p> <p>124(a)</p>	<p>.10 Review of payroll records.</p> <p>.11 Review employment agreements.</p> <p>.12 Verify with daily assignment sheet.</p>

CCI

	METHODS USED TO ESTABLISH CRITERIA
<p>10</p> <p>Title I monies are not used to pay the salaries of employees of private schools except for services outside regular hours of duty and under public supervision and control or for the construction of private school facilities.</p> <p>116a.23(f)</p>	<p>.00 Pre-on-site review and approval of application for funds by SEA.</p> <p>.10 Copies of teachers' schedules.</p> <p>.40 Staff Interview.</p>
<p>NON-INSTRUCTIONAL DUTIES OF STAFF</p>	
<p>11</p> <p>Staff paid entirely with Title I funds are assigned to non-Title I functions (such as rotating supervisory duties not related to classroom instruction) for no more than 10 percent of their time or the same portion of time that non-Title I staff spend on those duties, whichever is less.</p> <p>134</p>	<p>.10 Review of staff schedules.</p> <p>.30 Observe duty roster in each building with Title I program.</p> <p>.40 Staff Interview.</p>
<p>CONSTRUCTION OF FACILITIES</p>	
<p>12</p> <p>The purchase of all equipment and the construction or remodeling of any facilities are demonstrated as being essential to the success of the Title I Project.</p> <p>124(n) 116.32(a)</p> <p>NOTE: Construction or remodeling of facilities with Title I funds should not occur.</p>	<p>.00 Approval of applications for funds by SEA.</p>

INSTRUCTIONAL PROGRAM
(Structure, Scope, Quality)

District _____ School _____ Monitor _____

Schedule and Organization

- Do teachers/aides have a schedule they follow?
- Who makes up the schedule?
- Is there evidence of coordination between Title I and classroom teachers?
- How much teacher/aide time is spent in direct instruction with target students?
 - a. Can you see evidence of current preparation of materials for teaching, such as lists of new words, charts, flash cards, ditto activities that correlate to program?
 - b. Who prepares material?
 - c. Is time provided for preparation of materials?
 - a. Does the teacher/aide have a method of recording individual progress?
 - b. Does it show individual student placement, comprehension and skill instructional needs, and oral reading performance?
 - c. Does the classroom teacher have a record keeping system that is current and reveals it?
- Are the teachers and aides using teachers' manuals to guide instruction daily?

Teaching Methods

1. Does the teacher/aid begin teaching on time?
2. Does the teacher/aid have students sitting so they can see instructional materials?
3. Is there an emphasis on hearing and seeing all children respond?
4. Does the teacher/aid provide varied activities -- every 10-15 minutes?
5. Does the teacher/aid call for both group and individual response?
6. Does the teacher/aid correct student errors when they occur?
7. Does the teacher/aid make more positive than negative comments to the students?

Child Behavior

1. Does the pupil appear to be placed properly in instructional materials?
2. Can pupils see instructional material?
3. Do pupils respond when called upon?
4. What kind of responses can pupils make to words they read? _____
Can they read them loud? _____
Can they copy them? _____
Can they use them in a sentence? _____
5. Can the pupil read a paragraph to you with reasonable fluency and with less than 10 errors per 100 words? Can he answer 3 out of 4 questions you ask about the story?

Position _____

parent, aide, reading teacher,
classroom teacher, principal, etc

HERE'S HOW MY BUILDING'S SUPPLEMENTARY READING PROGRAM WORKS:

Check any that fit:

FOR WHOM?

_____ Kids selected by standardized test: _____
name of test

_____ Kids selected by classroom teachers.

_____ Other _____
please describe

BY WHOM?

_____ Children taught by aide(s).

_____ Children taught by reading teacher(s).

_____ Other _____

_____ Reading instruction supervised/coordinated by _____

WHEN?

_____ Every day for _____ minutes.

_____ Other _____

WHERE?

_____ Regular classroom.

_____ Separate room.

_____ Other _____

HOW?

_____ One type of instructional material: _____
name of material

_____ Combination of instructional materials.

_____ Individual tutoring.

_____ Small group instruction.

_____ Other _____

HOW DO YOU KNOW
IT'S WORKING?

_____ Pre- and post-testing, using _____
name of test

_____ Continuous progress checks _____
describe

_____ Other _____

HERE'S HOW I FEEL ABOUT OUR SUPPLEMENTARY READING PROGRAM:

	Fine	Not Sure	Need to Improve
1. Selection of children to receive supplementary instruction.			
2. Diagnosis of reading problems.			
3. Teaching to improve skill weaknesses.			
4. Teaching materials used.			
5. Organization (that is pull-out, individual tutoring, aide in classroom, etc.).			
6. Inservice (supervision, coordination, assistance to instructors).			
7. Kids' feelings about supplementary reading instruction.			
8. Coordination/cooperation between classroom teachers and reading teachers.			
9. Evaluation procedures (HOW progress is measured).			
10. Results (children's actual reading progress).			
11. Parent involvement.			

AND FURTHERMORE:

The BEST thing about our program is _____

But what we NEED is _____



TITLE , ESEA MONITORING REPORT - PART B
 FOR FISCAL YEAR 19__

SCHOOL SY	FEM	TITLE I, ESEA AREA CONSULTANT'S SIGNATURE
SUPERINTE	DENT	DATE

<u>PROJECT TERM:</u> Regular _____ Summer _____	<u>INSTRUCTIONAL COMPONENTS</u> Preschool _____ Mathematics _____ Reading/Language Arts _____ Special Components for Handicapped _____	<u>SUPPORTIVE SERVICES:</u> _____ _____ _____
SCHOOL-WIDE PROJECT: _____		

SCORING CODE: (✓) Meets Objective (X) Objective Not Met (N) Not Applicable	DOCUMENTATION:
--	----------------

FISCAL ACCOUNTING AND OTHER RECORDS

- | | |
|---|--|
| () 1. There is documentary evidence that travel and subsistence are paid to the appropriate personnel as approved in the application and in accordance with State Board of Education policy. | State Board of Education policies. |
| () 2. Time logs are maintained for all part-time personnel paid from Title I funds and documented by before-the-fact statements of the time estimated that each employee will devote to each project and by after-the-fact statements of the actual time each employee devoted to the project. The statements shall be signed by the responsible official. | Georgia State Regulations and Procedures Manual for Title I, ESEA. Appendix B-General Provisions for Program |
| () 3. Children residing in approved local institutions for the neglected and delinquent are receiving services commensurate with funds allocated. | Allocations for Institutions. Section 116(a)5(b)(2) |
| () 4. There is an equipment inventory that is current. | Section 100b. 215 General Provision For Program. |

ADVISORY COUNCILS

- | | |
|---|----------------------------|
| () 5. There is evidence that the district advisory | Section 125(a)(1)(A)(B)(C) |
|---|----------------------------|

council (a) has a majority of members who are parents of children to be served, (b) is composed of members elected by the parents in each district, (c) includes representatives of children and schools eligible to be served, but not currently participating in programs funded by Title I, ESEA.

P. . 95-561

- () 6. There is evidence that the LEA has established an advisory council for each project area or school which (a) has a majority of members who are parents of children to be served and (b) is composed of members elected by the parents in each attendance area. (Applicable only to schools which have more than forty students participating in project components and more than one full time equivalent staff member.)

Section 125(a)(2)(A)
(i)(ii) P.L. 95-561

- () 7. There is evidence that a school advisory council in a project area in which 75 or more children are served is composed of no less than eight members who serve for two years, and
 - (a) elected officers of the council after it had been fully constituted, and
 - (b) meets a sufficient number of times a year according to a schedule and at locations determined by each council.

Section 125(a)(C)(i)
(i)(iii) P.L. 95-561

- () 8. The LEA has provided without charge to each member of its advisory councils copies of:
 - (a) Title I of the Act
 - (b) Federal Regulations
 - (c) Georgia State Regulations and Procedures Manual for Title I, ESEA

Section 125(c)(i)(A)
(i)(C). P.L. 95-561

SOURCE OF DOCUMENTATION: _____

- () 9. The LEA has given its parents advisory council responsibility for advising it in the planning, implementing and evaluating of the Title I project.

Section 125(b)
P. . 95-561

SOURCE OF DOCUMENTATION: _____

- () 10. All parents of participants have had an opportunity to express their views to the appropriate advisory council concerning the project application.

Section 125(b)
P. . 95-561

SOURCE OF DOCUMENTATION: _____

- () 11. Principals and Title I teachers are actively involved in advisory council activities.

SOURCE OF DOCUMENTATION

PARTICIPANTS AND SERVICES

- () 12. There is evidence that children participating in Title I funded instructional components are receiving supplementary instruction in accordance with the approved schedule described in the application. Section 126(c)
P.L. 95-561
- () 13. Each approved instructional component in the project is serving a number of children no greater than the number approved in the application. Section 121(4)
P.L. 95-561
- () 14. A current list of children participating in each instructional component and receiving supportive service is available at the district level as well as in each project school. Section 124(b)
P.L. 95-561
- () 15. There is documentary evidence which indicated that the list of specifically identified, educationally deprived children receiving services are the children with the greatest needs or who have participated in Title I components in previous years and remain educationally deprived. Section 124(b)
P.L. 95-561
- () 16. Each Title I teacher has a current list of specifically identified, educationally deprived children under her care and is serving a number no greater than approved in the application. (Auxiliary personnel are not included in the pupil/teacher ratio.) Section 121
Section 124(b)
P.L. 95-561
- () 17. Supportive services are provided only for those children who are participating in Title I funded instructional components. Section 124(f) (2)
P.L. 95-561

STAFF ASSIGNMENT, CERTIFICATION LICENSING AND IN-SERVICE

- () 18. The superintendent has on file documentary evidence that all professional staff members employed with Title I funds have valid certificates and that each is certified for his or her field of work in accordance with State Board of Education policy. State Board of
Education
policy.
- () 19. Each full time person listed on accounts 4600 and 4800 is performing only Title I duties.

- (20. The Staffing design approved in the project application has been filled. Section 121 P.L. 95-561
- (21. Each Title I-paid auxiliary person is under direct supervision of a certified teacher who is assigned to teach in a Title I component. State Board of Education policy
- (22. Each Title I-paid auxiliary person holds a valid license in accordance with State Board of Education policy State Board of Education policy
- (23. Each Title I-paid auxiliary person is working only in components and supportive services as described in the approved application. Section 121 P.L. 95-561
- (24. The non-instructional duties assigned Title I-paid personnel are limited to rotating, supervisory duties not related to classroom instruction, and are only those to which similarly situated personnel are assigned at the same school site and do not exceed the same portion of time as similar situated personnel or ten percent of total time whichever is less. Section 134 P.L. 95-561
- (25. There is evidence to demonstrate that teachers and the school board have been involved in planning of the Title I program and will be involved in the evaluation. Section 124(i) P.L. 95-561

SOURCE OF DOCUMENTATION: _____

- (26. There is evidence that the LEA has well developed training programs in which education aides, including volunteers, and the professional staff, whom they are assisting will participate together. Section 124(1) P.L. 95-561

SOURCE OF DOCUMENTATION: _____

PRIVATE SCHOOLS

- (27. The LEA maintains direction and control of staff program equipment and materials in each participating private school. Section 116.42(b)
- (28. Each child enrolled in a private school Title I component resides in an eligible public school attendance area. Section 130(a) P.L. 95-561



() 29. There is documentary evidence that the program in each private school is serving the eligible children with the greatest needs.

Section 130(a)
P.L. 95-561

ACCESS TO INFORMATION

() 30. There is evidence that the LEA has made the application and all pertinent documents available to parents, teachers and other members of the general public.

Section 127(c)
P.L. 95-561

PROGRAM QUALITY, METHODS, MATERIALS AND MANAGEMENT

31. The principal and Title I staff are familiar with the program and fully understand the duties and responsibilities of their position relative to proper implementation of the Title I funded components in their schools.

Section 124(d)
Section 124(h)
P.L. 95-561
(Applies to items 31 - 42)

YES ___ NEED IMPROVEMENT ___ COMMENTS: _____

32. Title I staff are aware of the criteria for selecting participants and are included in the process selection.

YES ___ NEED IMPROVEMENT ___ COMMENTS: _____

33. There is evidence of coordination of the Title I effort with the State and local-funded effort and that an opportunity exists for Title I-paid staff to confer with State and local staff on the planning and delivery of the instructional program to participating children.

YES ___ NEED IMPROVEMENT ___ COMMENTS: _____

34. Supervisory staff approved under Title I are active in the establishment and continual improvement of remedial programs specifically designed to reinforce the learning of participants in their regular school programs.

YES ___ NEED IMPROVEMENT ___ COMMENTS: _____

35. There is evidence that the instructional program funded by Title I supplements and expands the program funded from state and local funds.

YES ___ NEED IMPROVEMENT ___ COMMENTS: _____



36. There is evidence that equipment and instructional materials provided by Title I are supplemental and are an extension of those provided in the basic program, and are clearly related to achieving the project's objective.

YES _____ NEED IMPROVEMENT _____ COMMENTS: _____

37. There is evidence that in-service programs are appropriate for meeting the objectives of the project and suitable for meeting the needs of the children served.

YES _____ NEED IMPROVEMENT _____ COMMENTS: _____

38. Classroom organization and management appropriate for remedial students are included in in-service training.

YES _____ NEED IMPROVEMENT _____ COMMENTS: _____

39. The diagnostic, prescriptive approach to learning, which addressed balance, sequence and assessment methodology is evident.

YES _____ NEED IMPROVEMENT _____ COMMENTS: _____

40. Personal student records containing diagnosis, assignments, progress and evaluations are maintained.

YES _____ NEED IMPROVEMENT _____ COMMENTS: _____

41. Title I teachers have a monthly or multi-week plan stating objectives, desired outcomes, and skills to be mastered during the planned process.

YES _____ NEED IMPROVEMENT _____ COMMENTS: _____

42. Students and parents are being informed of progress in the program.

YES _____ NEED IMPROVEMENT _____ COMMENTS: _____

- | | |
|--|--|
| () 43. There is evidence that Title I funds are used to provide services that the LEA is not required to provide the participants with state funds. | Section 174
P.L. 95-561 |
| () 44. The LEA maintains administrative and supervising control of the use of Title I funds and title to equipment purchased with such funds. | Section 124(m) |
| () 45. Title I-purchased equipment is maintained and disposed of in accordance with procedures established in <u>Georgia Accounting Handbook for Local School Systems</u> . | Section 165
127(a)(b)
P.L. 95-561
Section 100b.215
General
Provisions for
Programs |
| () 46. There is evidence that lost or stolen equipment destroyed by fire, theft, or vandalism is properly reported to the SEA. | Section 100b.315
(d)(3)
General
Provisions for
Programs |

RECOMMENDATIONS:

- () Program in good order; no follow-up needed.
- () Minor exceptions; recommendations stated in accompanying letter to Superintendent.
- () Program weaknesses; need technical assistance.

17. PROJECT OF SUFFICIENT SIZE, SCOPE AND QUALITY	YES	NO**	N/A
17.1 The educational objectives of the project are adequately related to one or more of the special educational needs of the participating children as identified in accordance with Sec. 124(a)(d), p. 2164.	---	---	---
17.2 The resources being used are consistent with and show reasonable promise of meeting the objectives of the project. Sec. 124(d)(e), p. 2164.	---	---	---
17.3 The evaluation plans are adequate for measuring the attainment of the objectives to meet the special educational needs identified by the diagnostic procedures used. Sec. 124(g), p. 2165.	---	---	---
17.4 Expenditures are not imprudent, extravagant, excessive or wasteful. Sec. 127(a), p. 2170.	---	---	---
17.5 The LEA has given due consideration to the inclusion of an LEA Title I summer program. Sec. 124(k), p. 2166.	---	---	---
*17.6 Expenditures are solely for the purpose of meeting the special educational needs of educationally deprived children. Sec. 123(a)(b)(c)(d), pp. 2163-2164; Sec. 124(b), p. 2164; Sec. 127(a), p. 2170.	---	---	---
17.7 The names of children participating in the Title I programs are readily identifiable in each school. Sec. 124(b), p. 2164.	---	---	---
17.8 Schedule and size of groups allow for sufficient time for individualized compensatory activities. Sec. 124(d), p. 2164.	---	---	---
17.9 The project has not been designed to meet, nor does it have the effect of meeting, the general needs of the schools or of the student body at large in a school or of a specified grade in a school. Sec. 123(a), p. 2163, Sec. 124(b), p. 2164.	---	---	---
17.10 Have services and resources provided under Title I been offered <u>only</u> to those children who have been selected to participate in the project? Sec. 121, p. 2161; Sec. 123(a), p. 2163; Sec. 124(a), p. 2164.	---	---	---
17.11 The LEA does not provide like or similar services in non-eligible buildings. Sec. 126(c)(d), p. 2169.	---	---	---

*Represents critical compliance item.

**All no responses require an explanation on reverse side.

	<u>YES</u>	<u>NO**</u>	<u>N/A</u>
17.12 The Title I project is of sufficient size, scope and quality to give reasonable promise of substantial progress toward meeting the special educational needs of children to be served. Sec. 124 (d), p. 2164.	_____	_____	_____

Revise
August 1980

PENNSYLVANIA DEPARTMENT OF EDUCATION
COMPENSATORY EDUCATION DIVISION

PROGRAM DESCRIPTION FOR ESEA TITLE I READING PROGRAMS

Purpose:

The purpose of this program description is to identify current trends and practices in Pennsylvania ESEA Title I reading programs. Information submitted to the Pennsylvania Department of Education will be compiled in a statewide summary. The local district is asked to complete the entire questionnaire for the on-site evaluation team. The on-site evaluation team will verify as much information as possible. The reading program description is NOT a compliance check. It is not likely that a district will find all items on the form applicable.

Directions:

1. The questionnaire should be completed cooperatively by the Project Director and the Title I reading staff.
2. One form may be sufficient for each school district. Where programs differ greatly from building to building, or level to level, separate forms may be used.
3. Respondents should feel free to make comments about the program's structure which may be unique.
4. Respondents need not feel that every question should be answered. Respond only to those items which describe your program.
5. Respondents should give the completed form(s) to the on-site evaluators. The chairperson should check each item that was verified by the on-site evaluators. Any item that cannot be verified should be noted on the last page by the chairperson.
6. The completed form should be forwarded with the on-site evaluation report.

Name of School District _____

School (district or building) described _____

Date _____ Project number: _____

Form Completed by _____

PROGRAM DESCRIPTION FOR TITLE I
READING

District Questionnaire

A. PROGRAM ORGANIZATION: Respond only to those items that apply.

On-site
evaluator:
check if
verified.

1. Identify the written sequence of skills used for:

Word Attack _____

Comprehension _____

Study Skills _____

Other _____

2. Identify diagnostic/criterion referenced tests used to determine students' specific skill development in:

Word Attack _____

Comprehension _____

Study Skills _____

Other _____

3. Explain the record keeping system maintained to indicate students' specific mastery in:

Word Attack _____

Comprehension _____

Study Skills _____

Other _____

On-site
evaluator:
check if
verified.

4. Explain informal testing used to determine students' specific skill development in:

Word Attack _____

Comprehension _____

Study Skills _____

Other _____

5. How are instructional reading groups formed? (by weaknesses, strengths, interests, etc.)

6. Describe how the Title I reading program is integrated with the regular school reading program. For example, students may progress through the same skill sequence; both instructional programs stem from a common diagnostic base; record keeping is integrated to prevent gaps and overlap in consistency.

7. A written planned course exists for Option 4 teaming of Title I with other disciplines at the secondary level.
Yes _____ No _____ What is that teaming relationship?

List other-discipline _____

8. Title I records of skills' mastery become part of each student's cumulative reading record: Yes _____ No _____

B. PROGRAM MANAGEMENT

On-site evaluator: check if verified.

1. Each Title I teacher of reading is a certified reading specialist or enrolled in the program: Yes _____ No _____

2. How does a certified reading specialist/supervisor provide close supervision for each noncertified Title I reading teacher and/or aides?

3. What is the nature of technical assistance Title I teachers receive from the consultant/supervisor?

4. Physical location of the Title I reading teacher is:

5. On a chart below indicate the number of Title I instructional periods per week by grade and the minutes per instructional period.

	K	1	2	3	4	5	6	7	8	9	10	11	12
Periods per Week													
Minutes per Period													



C. IN-SERVICE

On-site
evaluator:
check if
verified.

All Title I reading teachers and aides have had or have scheduled for this year, an in-service program(s) covering the following topics:

- _____ Word Attack
- _____ Comprehension
- _____ Pennsylvania Comprehensive Reading Plan
- _____ Diagnostic/Criteria referenced testing
- _____ Informal test measures
- _____ Classroom record keeping
- _____ Instructional grouping
- _____ Construction in use of practice materials
- _____ Adjusting to student learning style
- _____ Adjusting to student interests
- _____ Other:

D. METHODS

1. What is (if any) the relationship between the materials used in Title I classes and materials used in the regular classroom?

2. List the five materials most frequently used in Title I classes:

On-site
evaluator:
check if
verified.

Exhibit B-1j. (page 6 of 6)

3. List the teaching techniques or methods most frequently used in Title I classrooms, e.g., language experience, programmed instruction, DRA, etc.):

E. CLIMATE

1. Parents are used in the instructional program:

As volunteer helpers _____ As occasional visitors _____

In another capacity (specify) _____

In no capacity _____

2. Title I teachers confer with classroom teachers on current skill development needs and individual students:

Weekly _____ Biweekly _____ Monthly _____

Other _____

3. Lessons and/or activities are planned to promote the enjoyment of reading:

At least weekly _____ Biweekly _____ Monthly _____

Seldom _____ Never _____

ANY ITEM THAT COULD NOT BE VERIFIED SHOULD BE LISTED BELOW:

PROGRAM DESCRIPTION FOR ESEA TITLE I MATHEMATICS PROGRAMS

Purpose:

The purpose of this program description is to identify current trends and practices in Pennsylvania ESEA Title I mathematics programs. Information submitted to the Pennsylvania Department of Education will be compiled in a statewide summary. The local district is asked to complete the entire questionnaire for the on-site evaluation team. The on-site evaluation team will verify as much information as possible. The mathematics program description is NOT a compliance check. It is not likely that a district will find all items on the form applicable.

Directions:

1. The questionnaire should be completed cooperatively by the Project Director and the Title I mathematics staff.
2. One form may be sufficient for each school district. Where programs differ greatly from building to building, or level to level, separate forms may be used.
3. Respondents should feel free to make comments about the program's structure which may be unique.
4. Respondents need not feel that every question should be answered. Respond only to those items which describe your program.
5. Respondents should give the completed form(s) to the on-site evaluators. The chairperson should check each item that was verified by the on-site evaluators. Any item that cannot be verified should be noted on the last page by the chairperson.
6. The completed form should be forwarded with the on-site evaluation report.

Name of School District _____

School (district or building) described _____

Date _____ Project Number: _____

Form Completed by _____

PENNSYLVANIA MATHEMATICS PROGRAM CHECKLIST FOR ESEA TITLE I

On-Site
Evaluator
Check If
Verified

Tit
Math
ics
Staff: Write
an X Before
Applicable
Items

1. Curriculum

- 1.1 A mathematics curriculum document stating the instructional objectives is available.
- 1.2 Students' abilities and needs are considered in formulating objectives.
- 1.3 The curriculum is consistent with local and state objectives.
- 1.4 The Title I Mathematics Program is correlated to the regular curriculum.

2. Methods

- 2.1 A variety of instructional methods are used to satisfy the needs of students.
- 2.2 Techniques used to accommodate learning styles.
 Visual Experimentation Creative
 Hands-on Problem solving
- 2.3 Learning is structured to proceed from concrete experiences to abstract reasoning.
- 2.4 Provision is made for instructional grouping based on learning activities and students' needs.
- 2.5 Instructional leaders (building principal, curriculum coordinator/director, mathematics supervisor, etc.) are involved in the mathematics program upon request.

3. Materials

- 3.1 There is an on-going selection and evaluation process for instructional materials.

Title I
Mathematics
On-Site Staff: Write
Evaluator an X Before
Check If Applicable
Verified Items

3.2 Students are provided with a variety of materials in addition to texts:

- _____ Displays
- _____ Manipulative devices
- _____ Filmstrips and films
- _____ Tapes
- _____ Games
- _____ Other (specify)
- _____ Kits

3.3 Instructional materials correlate with:

- _____ Students' interests
- _____ Students' abilities
- _____ Students' physical needs

3.4 Instructional materials are logically catalogued and easy to find.

3.5 Teachers are given help in the use of instructional materials.

4. Environment

4.1 There are instructional areas for:

- _____ Demonstration-discussion (large group)
- _____ Partner-small groups
- _____ Independent study

4.2 Resources are available, such as:

- _____ Classroom math centers
- _____ Multi-media centers
- _____ Math labs
- _____ Computer rooms
- _____ Libraries
- _____ Other (specify)

On-Site
Evaluator
Check If
Verified

Title I
Mathematics
Staff: Write
an X Before
Applicable
Items

5. Evaluation

5.1 There is an evaluation program that includes a variety of instruments and techniques.

5.2 Evaluation is related directly to the instructional objectives.

5.3 Teachers diagnose and evaluate informally during classroom activities.

5.4 Students can demonstrate mastery of objectives through a variety of means:

- Manipulative devices
- Discussions/conferences
- Construction of models or diagrams
- Standard test situations
- Interviews
- Other (specify)

5.5 Teacher evaluation is communicated regularly to the students and parents.

5.6 Teacher confers with classroom teachers and administrators.

6. Professional Growth

6.1 Professional magazines, books and materials are available for teacher use.

6.2 Teachers attend professional mathematics meetings and conferences.

6.3 Teachers meet current certificate and experience requirements.

6.4 Teachers are encouraged to continue their education.

6.5 Teachers observe other mathematics classes.

6.6 Teachers participate in inservice programs.

On-Site Title I
Evaluator Mathematics
Check If Staff: Write
Verified Applicable an X Before
Items

6.7 Teachers plan and conduct inservice education.

6.8 Inservice provides help to teachers in:

- _____ Use of instructional materials
- _____ Other ways to present mathematical concepts
- _____ Better or more efficient classroom management
- _____ Techniques for motivation
- _____ Techniques for diagnosis and evaluation
- _____ Use of existing supporting services
- _____ Use of media
- _____ Developing leadership and professionalism
- _____ Other (specify) _____

7. Comments:

Virginia Department of Education

Administrative Review Service

**OBSERVATION CHECKLIST - TITLE I
School and Classroom**

School Division _____

Date of Review _____

School _____

Reviewer _____

No. of Title I Classes Visited _____

Code for Chart B:

- C - The data and observation show compliance or the response is positive.
- N - The data and observation show non-compliance or the response is negative.
- U - Unobserved.

Note: The enclosed charts "A" and "B" are to be completed for each individual Title I Classroom visited at a school. Statements 1-8 on page 3 are to be answered upon completion of all Title I Classroom visits at a school. An answer of "No" to any of these eight statements should be explained in the "Comments" by describing the exception.

Rarely will it be possible to see evidence on all items in a single visit.

A. Type of Class Visited

Visit Number	Grade Level	Course or Subject	Activity, e.g. Lab, Group Work, Discussion Drill, etc.	Number of Title I Students	Title I Aide Present (Yes or No)	Minutes Visited
1.						
2.						
3.						
4.						
5.						

1. Title I funded personnel are performing duties as cited in the program application.
Yes ____ No ____ Unobserved ____ Comments:

2. Title I funds supplement and not supplant regular non-Federal funds.
Yes ____ No ____ Unobserved ____ Comments:

3. Title I property observed is maintained and permanently identified as to the source of funding.
Yes ____ No ____ Unobserved ____ Comments:

4. Supportive services are being conducted as cited in the program application.
Yes ____ No ____ Unobserved ____ Comments:

5. Instructional activities are congruent with the needs assessment data and scope of the program application.
Yes ____ No ____ Unobserved ____ Comments:

6. Title I instructional activities are conducted in those content areas as specified in the program application.
Yes ____ No ____ Unobserved ____ Comments:

7. Title I instructional activities are supplemental to regular instruction.
Yes ____ No ____ Unobserved ____ Comments:

8. Instructional materials and equipment observed are sufficient to meet learner needs.
Yes ____ No ____ Unobserved ____ Comments:

2. Handbooks

Monitoring handbooks have been developed to clarify states' monitoring practices. They may include a description of the SEA monitoring process, directions for conducting an onsite review, or copies of all the forms used during the process. West Virginia, for example, developed a monitoring handbook to accomplish the following objectives:

- result in an orderly, consistent, and thorough onsite review program;
- reduce the impact of the personal idiosyncrasies of the individual members of the review team and thus ensure greater uniformity in the review process; and
- enable the local educational agencies to determine exactly what program areas will be reviewed and the scope and nature of their areas of accountability.

Handbooks can be very voluminous and, therefore, examples are not included here. The existence of these handbooks is indicative of the formalization in monitoring that occurred when the 1978 legislation specifically mandated monitoring. Developing a handbook to clarify the monitoring process to be used in a state is an option for management under Chapter 1 as well.

3. Monitoring Feedback Reports

Monitoring feedback reports to LEAs vary as much in format as the monitoring instruments that states use to create the reports. Again, this variation reflects the individual needs of the SEAs and their constituent LEAs. When an SEA completes an onsite review of an LEA program, the monitors prepare a report for the LEA summarizing the results of the review and requesting a response within a certain time limit to items indicated as needing attention. A sampling of these feedback report forms is provided here.

Examples from North Carolina and Wisconsin are presented first. The North Carolina report (Exhibit B.3.a) is quite brief and shows the LEA, in numerical fashion, the results of the monitoring visit. The Wisconsin example (Exhibit B.3.b) is somewhat lengthier and provides more opportunity for written comments.

The final example is from the state of Washington (Exhibit B.3.c). This monitoring feedback report is noteworthy because it allows the results of all LEA monitoring to be computerized, thereby permitting the SEA to make comparisons of LEAs by size, region of state, budget, etc. This type of form also results in valuable management information for the state.

The examples presented for this section are from:

	<u>Page</u>
a. Monitoring Report (North Carolina)	137
b. Monitoring Report (Wisconsin).	141
c. Monitoring Report (Washington)	149

Exhibit B-3a. Monitoring Report (North Carolina) (page 1 of 3)

TITLE I MONITORING REPORT
 N. C. Department of Public Instruction
 Division of Compensatory Education

LEA _____	Code _____
Date of Report	_____
Date of Monitoring	_____

To: _____

The bases for monitoring the Title I program are the factors included in Part I and Part II of this report. A five point scale is employed to indicate the current status of each listed factor. A factor rating of (1) indicates that the status is good, for example.

Note, however, that a factor rating of (2) or (3) indicates a deficiency and requires an LEA response stating action taken or action planned to correct or improve that deficiency.

PART I - TITLE I PROGRAM REVIEW

Explanation of marking:

- | | |
|---|-------------------------------|
| 1. Appears to meet requirements | 3. Improvement is recommended |
| 2. Does not appear to meet requirements | 4. Not observed |
| | 5. Not applicable |

SCHOOL ELIGIBILITY

1. Attendance areas selection and documentation 1 2 3 4 5

PROGRAM DESIGN/IMPLEMENTATION

2. Annual needs assessment 1 2 3 4 5
3. Data supports planned program 1 2 3 4 5
4. Program (scope and size) meets educational needs 1 2 3 4 5
5. Appropriate persons involved in planning 1 2 3 4 5
6. Plans to sustain achievement 1 2 3 4 5
7. Projected public school expenditures 1 2 3 4 5
8. Projected non-public school pupil expenditures 1 2 3 4 5
9. Comparability maintenance plan 1 2 3 4 5
10. Non-instructional duties of personnel 1 2 3 4 5
11. Availability of Title I documents 1 2 3 4 5
12. Availability of official records to SEA 1 2 3 4 5
13. Accuracy of source data 1 2 3 4 5
14. Supplementing aspect 1 2 3 4 5
15. Project implementation 1 2 3 4 5

PUPIL SELECTION

16. Approved criteria followed 1 2 3 4 5

INSERVICE

17. For professional and paraprofessional 1 2 3 4 5
18. Research and demonstration information disseminated 1 2 3 4 5

EVALUATION/SUSTAINED EFFECTS

19. Plan 1 2 3 4 5
20. Procedures 1 2 3 4 5
21. Report 1 2 3 4 5
22. Project achievement 1 2 3 4 5

PAC/PARENTS

23. Properly established and functioning DAC 1 2 3 4 5
24. Properly established and functioning SAC 1 2 3 4 5
25. Distribution of legislation 1 2 3 4 5
26. Training 1 2 3 4 5
27. Delegation of advisory responsibilities 1 2 3 4 5
28. Parents involvement in project planning/evaluation 1 2 3 4 5
29. Parents involvement in children's education 1 2 3 4 5

Title I Monitoring Report, Continued

LEA

Explanation of marking:	
1. Appears to meet requirements	3. Improvement is recommended
2. Does not appear to meet requirements	4. Not observed
	5. Not applicable

COMPLAINT PROCEDURES

30. Written procedures and implementation 1 2 3 4 5

TITLE I EQUIPMENT

31. Control maintained by LEA 1 2 3 4 5

32. Utilization 1 2 3 4 5

33. Inventories 1 2 3 4 5

34. Disposition 1 2 3 4 5

35. Procedures for theft and loss 1 2 3 4 5

SCHOOL-WIDE PROJECTS

36. Implementation 1 2 3 4 5

PROGRAMS FOR NEGLECTED

37. Procedures for caseload verification 1 2 3 4 5

38. Projected expenditures 1 2 3 4 5

39. Provision for educational needs 1 2 3 4 5

PART II - TITLE I INSTRUCTIONAL REVIEW

Explanation of marking:	
1. Appears to be appropriate	3. Improvement is recommended
2. Does not appear to be appropriate	4. Not observed
	5. Not applicable

DIAGNOSTIC PROCEDURES

1. Instructional staff understand the diagnostic tools and how to use them. 1 2 3 4 5

2. Measures are used to assess and monitor each child's progress. 1 2 3 4 5

3. Individual student records are maintained and utilized. 1 2 3 4 5

4. Prescriptive plans are developed and utilized for each child. 1 2 3 4 5

5. The regular classroom and Title I teacher have agreed upon the priority instructional needs of each child. 1 2 3 4 5

6. There is evidence of regrouping for functional level instruction. 1 2 3 4 5

INSTRUCTION

7. The program is guided by a comprehensive set of instructional objectives which are related to the diagnostic/evaluation instrument(s). 1 2 3 4 5

8. The program is individualized to accommodate specific skill needs. 1 2 3 4 5

9. There are varied introductory and enrichment activities. 1 2 3 4 5

10. Materials are cross-referenced to insure functional level use. 1 2 3 4 5

11. Reading and/or Math skill development is correlated on a systematic means with the regular classroom teacher. 1 2 3 4 5

12. Instruction is positive and reinforced. 1 2 3 4 5

13. Activities/opportunities are offered to build student independence. 1 2 3 4 5

14. Activities are offered to enhance positive self-concepts. 1 2 3 4 5

15. Equipment and materials needed to teach the prescribed objectives are available and in good order. 1 2 3 4 5

Title I Monitoring Report, Continued

LEA _____

Explanation of marking:

- | | |
|--------------------------------------|-------------------------------|
| 1. Appears to be appropriate | 3. Improvement is recommended |
| 2. Does not appear to be appropriate | 4. Not observed |
| | 5. Not applicable |

INSTRUCTIONAL AREA

- | | | | | | |
|--|---|---|---|---|---|
| 16. Instructional area is clean. | 1 | 2 | 3 | 4 | 5 |
| 17. Instructional area is neat and attractive. | 1 | 2 | 3 | 4 | 5 |
| 18. Lighting is adequate. | 1 | 2 | 3 | 4 | 5 |
| 19. Space is adequate. | 1 | 2 | 3 | 4 | 5 |

STAFF DEVELOPMENT

- | | | | | | |
|--|---|---|---|---|---|
| 20. The Title I Director coordinates staff development with other instructional areas as appropriate. | 1 | 2 | 3 | 4 | 5 |
| 21. Title I supervisory/administrative and instructional staff meet periodically to enhance the Title I instructional program. | 1 | 2 | 3 | 4 | 5 |
| 22. Follow-up activities are planned to implement that which has been gained through staff development. | 1 | 2 | 3 | 4 | 5 |

COMMENTS (Optional)

NOTE: Please forward responses to the Regional Coordinator within 30 days. State specific action(s) which will be (have been) taken to (a) improve the status of items marked 2 or 3 on the reporting scale, and (b) to adopt a recommendation included in the comment section or in an attached letter.

Regional Coordinator
Compensatory Education

CC: Central File
Title I Director
DAC Chairman

Exhibit B-3b. Monitoring Report (Wisconsin) (page 1 of 8)

A REPORT SUBMITTED TO
THE SCHOOL DISTRICT OF _____
ON THE
FINDINGS OF THE FY 1981 TITLE I PROJECT ON-SITE REVIEW
DATE OF REVIEW: _____

REVIEW CONDUCTED BY WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION
STATE TITLE I OFFICE
TEAM MEMBERS:

TITLE I ESEA MONITORING REPORT

Exhibit B-3b. (page 2 of 8)

PROJECT # _____, FY 1981

SCHOOL DISTRICT OF _____ DATE OF REVIEW: _____

SECTION I - COMPLIANCE REVIEW

This section provides a review of findings related to the district's compliance with requirements of Title I Law. When Non-Compliance is indicated for a Requirement, specific explanation will be given under Comment. An /X/ in front of NA acknowledges the respective item is not applicable to the project. Additional information requests will be identified under Comment and a check placed in the Decision Pending box. Corrective Action is required for each identified Non-Compliance area within 30 days following the receipt of this report. Section II (Page 5) of this report should be consulted to determine what action is to be taken by the district to effect compliance.

COMPLIANCE REQUIREMENTS

LEA COMPLIANCE STATUS

<p>1. Targeting Procedures Comment:</p>	<p><input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending</p>
<p>2. Eligibility of Children Being Served Comment:</p>	<p><input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending</p>
<p>3. Services to Private School Children Comment:</p>	<p><input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending</p>
<p>4. Program Design and Implementation Comment:</p>	<p><input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending</p>

COMPLIANCE REQUIREMENTS

LEA COMPLIANCE STATUS

<p>5. Program Size, Scope and Quality Comment:</p>	<p><input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending</p>
<p>6. Project Evaluation Schema/Uses of Data Comment:</p>	<p><input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending</p>
<p>7. Sustaining Gains Comment:</p>	<p><input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending</p>
<p>8. Classroom Teacher and School Board Participation Comment:</p>	<p><input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending</p>
<p>9. Information Dissemination Comment:</p>	<p><input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending</p>
<p>10. Parent Participation in Program Planning and Evaluation Comment:</p>	<p><input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending</p>



Section I - Compliance Review Conducted: _____
(Date)

Exhibit B-3b. (page 4 of 8)

COMPLIANCE REQUIREMENTS

LEA COMPLIANCE STATUS

11. Parent Involvement/Council Activities/Parent Training Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending
12. Complaint Resolution Procedures Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending
13. Funds Allocation Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending
14. Accountability Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending
15. Control of Funds/Title I Property Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending
16. Construction/Rental of Facilities/Remodeling Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending

Section I - Compliance Review Conducted: _____
(Date)

Exhibit B-3b. (page 5 of 8)

COMPLIANCE REQUIREMENTS

LEA COMPLIANCE STATUS

17. Staffing Patterns/Staff Certification Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending
18. Staff Development Program Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending
19. Staff Assignments - Non-Instructional Duties Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending
20. Services to Migratory Children Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending
21. Services to Neglected and Delinquent Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending
22. Congruency Between Application Content and Actual Operation of Project Comment:	<input type="checkbox"/> Compliance <input type="checkbox"/> Non-Compliance <input type="checkbox"/> NA <input type="checkbox"/> Decision Pending

TITLE I ESEA MONITORING REPORT

SECTION II - SEA REQUIRED CORRECTIVE ACTION

RECOMMENDATIONS AND SUGGESTIONS

Date of Review: _____

Part One - Corrective Action

These statements indicate the Corrective Action required for each Non-Compliance area identified in Section I. A letter of response indicating the action taken or to be taken by the district to ensure compliance is requested within thirty (30) days.

Part Two - Recommendations

These Recommendations are presented in recognition of the joint responsibility that is to be assumed by the State and Local Education Agencies to cooperatively pursue continued project improvements which may have increased potential for strengthening the impact that the Title I program can have in meeting the needs of educationally disadvantaged children.

Federal regulations require that the LEA notify the SEA of action taken or to be taken in response to Recommendations related to Title I program improvement. The district's response may outline a plan to examine the feasibility of the Recommendations if study of a long-range nature is needed.

The Title I Supervisor will appreciate opportunities to discuss perceptions held by district personnel related to the Recommendations via telephone, during the application review and processing session, or during technical assistance visits to the project site.

Section II - SEA Required Corrective Action,
Recommendations and Suggestions
Date of Review: _____

Exhibit B-3b. (page 8 of 8)

Part Three - Suggestions

These statements are provided in the spirit of professional sharing for consideration by district representatives working closely with the Title I project.

SUPERINTENDENT OF PUBLIC INSTRUCTION
CATEGORICALLY FUNDED PROGRAM MONITORING REPORT

Exhibit B-3c. (page 2 of 5)

LEA:	CONTACT PERSON(S)
FUND CODE:	
MONITOR:	SCHOOL BUILDING/DISTRICT REPORT:

Item	Program Observations / Technical Assistance

FORM DISTRIBUTION: WHITE (SEA) CANARY (EVALUATION) PINK (LEA)

SUPERINTENDENT OF PUBLIC INSTRUCTION
DIVISION OF GRANTS AND EQUITY PROGRAMS
TITLE I REGULAR MONITORING SUMMARY

PAGE NO: 1

Sample printout

DISTRICT LEVEL REPORT

REPORT DATE: MAR 6, 1991

ED 121

COUNTY-DISTRICT # 17406

DISTRICT NAME: ~~SOUTHWEST~~
DATE OF VISIT: 02/18/81
DISTRICT SIZE CODE: F

MONITOR: BRAT
FUND CODE: 01
GEOGRAPHIC CODE: 01

THE FOLLOWING EXCEPTIONS WERE OBSERVED:

MANAGEMENT PLAN

- 001. Management plan missing necessary information regarding administration.
- 005. Management plan missing necessary information regarding dissemination plan.

INVENTORY

- *** NO EXCEPTIONS NOTED.

NEEDS ASSESSMENT

- 013. Need assessment back-up documentation not available.

PRIVATE/NON-PROFIT

- *** NO EXCEPTIONS NOTED.

TITLE I NEGLECTED AND DELINQUENT

- *** NO EXCEPTIONS NOTED.

TRAINING

- *** NO EXCEPTIONS NOTED.

INFORMATION RELATING TO IDENTIFIED CHILDREN

- *** NO EXCEPTIONS NOTED.

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SUPERINTENDENT OF PUBLIC INSTRUCTION
DIVISION OF GRANTS AND EQUITY PROGRAMS
TITLE I REGULAR MONITORING SUMMARY

PAGE NO: 2

DISTRICT LEVEL REPORT

REPORT DATE: MAR 6 1981

FID 131

COUNTY-DISTRICT # 17406

DISTRICT NAME: ~~SOUTH-CENTRAL~~
DATE OF VISIT: 02/18/81
DISTRICT SIZE CODE: F

MONITOR: BRATT
FUND CODE: 01
GEOGRAPHIC CODE: 31

THE FOLLOWING EXCEPTIONS WERE OBSERVED:

PARTICIPANT LIST

*** NO EXCEPTIONS NOTED.

TARGET AREA SELECTION

*** NO EXCEPTIONS NOTED.

EVALUATION

*** NO EXCEPTIONS NOTED.

ARENT ADVISORY COUNCIL INVOLVEMENT

033. A complaint resolution has not been formulated and/or given to members.

LEARNING INVOLVEMENT

*** NO EXCEPTIONS NOTED.

ACCESS TO INFORMATION

*** NO EXCEPTIONS NOTED.

FISCAL MANAGEMENT

*** NO EXCEPTIONS NOTED.

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SUPERINTENDENT OF PUBLIC INSTRUCTION
DIVISION OF GRANTS AND EQUITY PROGRAMS
TITLE I REGULAR MONITORING SUMMARY

PAGE NO: 3

DISTRICT LEVEL REPORT

REPORT DATE: MAR 6, 1981

SFD 101

COUNTY DISTRICT # 17406

DISTRICT NAME: ██████████
DATE OF VISIT: 02/18/81
DISTRICT SIZE CODE: F

MONITOR. BRANCH
FUND CODE: 01
GEOGRAPHIC CODE: 00

THE FOLLOWING EXCEPTIONS WERE OBSERVED:

PROGRAM OBSERVATION(S)

01:05: ADMINISTRATION AND DISSEMINATION COMPONENTS OF THE
MANAGEMENT PLAN SHOULD INCLUDE GREATER SPECIFICITY.
A TIMELINE AND PERSONS RESPONSIBLE SHOULD BE ADDED
TO THE DISSEMINATION PLAN.

TECHNICAL ASSISTANCE REQUEST(S)

NONE

153

155

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References

- Bessey, B. L., Brandt, D. A., Thompson, P. A., Harrison, L. R., Putman, K. E., & Appleby, J. A. A study of state management practices: Looking back at Title I and toward Chapter 1. Final Report. Palo Alto, CA: American Institutes for Research, 1982. (AIR-857-8/82-FR)
- Committee on Education and Labor, U.S. House of Representatives. A Report on the Education Amendments of 1978. H.R. 15. Report No. 95-1137. Washington, DC: U.S. Government Printing Office, 1978.
- Committee on Education and Labor, U.S. House of Representatives. Hearing on Title I, ESEA Regulations, H. Res. 423. Washington, DC: U.S. Government Printing Office, 1979.
- Committee on Human Resources, U.S. Senate. Education Amendments of 1978: Report to Accompany S.1753. Report No. 95-856. Washington, DC: U.S. Government Printing Office, 1978.
- Gaffney, M. J., Thomas, C., & Silverstein, R. An analysis of the legal framework for state administration of Title I of the Elementary and Secondary Education Act of 1965. Washington, DC: Lawyers Committee for Civil Rights Under Law, 1977.
- National Institute of Education. Administration of compensatory education. Washington, DC: National Institute of Education, 1977.
- SRI International. Trends in management of ESEA Title I: A perspective from compliance reviews. Menlo Park, CA: SRI International, 1979.

APPENDIX A

Sources of Information on Exemplary Materials

The following are addresses of state Chapter 1 offices that readers can use to obtain more information regarding the materials presented in this module.

Coordinator, Chapter 1
Alaska Dept. of Education
State Office Bldg., Pouch F
Juneau, AK 99811

Coordinator, Chapter 1
Arkansas Dept. of Education
Arch Ford Education Building
Little Rock, AR 72201

Supervisor, Chapter 1
Colorado Dept. of Education
201 E. Colfax Street
Denver, CO 80203

Chapter 1, Program Development
Delaware Dept. of Education
P. O. Box 1402
Dover, DE 19901

Director, Compensatory Education
Georgia Dept. of Education
State Office Building
Atlanta, GA 30334

Manager, Comp. Education Section
Illinois Dept. of Education
100 North First Street
Springfield, IL 62777

Coordinator, State & Fedl. Pgms.
Kansas Dept. of Education
120 East 10th Street
Topeka, KS 66612

Director, Chapter 1 ECIA
Louisiana Dept. of Education
P. O. Box 44064
Baton Rouge, LA 70804

Coordinator, Chapter 1 ECIA
Michigan Dept. of Education
P. O. Box 3008
Lansing, MI 48909

Director, Chapter 1 ECIA
Minnesota Dept. of Education
550 Cedar Street, Room 807
St. Paul, MN 55101

Coordinator, Chapter 1 ECIA
New Jersey Dept. of Education
225 West State Street
Trenton, NJ 08608

Dir., Div. of Fedl. Educ. Opp. Pgm.
New York Dept. of Education
Room 878 EUBA
Albany, NY 12234

Director, Compensatory Educ.
North Carolina Dept. of Public Instr.
Education Building
Raleigh, NC 27602

Coordinator, Chapter 1 ECIA
Ohio Dept. of Education
933 High Street
Worthington, OH 43084

Chief, Compensatory Educ. Pgms.
Pennsylvania Dept. of Education
333 Market Street
Harrisburg, PA 17108

Director, Compensatory Education
Texas Education Agency
201 East 11th Street
Austin, TX 78701

Director, Chapter 1 ECIA
Utah Department of Education
250 East Fifth South
Salt Lake City, UT 84111

Assoc. Dir., Chapter 1 ECIA
Virginia Dept. of Education
Box 6Q
Richmond, VA 23216

Chapter 1 Supervisor
Washington Dept. of Education
Old Capitol Building
Olympia, WA 98504

Director of Compensatory Education
West Virginia Dept. of Education
Capitol Complex, Rm. 252, Bldg. 6
Charleston, WV 25304

Chapter 1 Administrator
Wisconsin Dept. of Education
125 South Webster Street
Madison, WI 53702