

>> Ramiro Nava: Welcome to the CPM, Categorical Program Monitoring session. We will be talking with you about items on the Cross Program instrument. The information we are providing will assist your preparation for a CPM visit. We will be focusing on the Cross Program instrument items that were found not to be meeting legal requirements during the 07-08 CPM cycle. Before we start, I like to introduce you to our panel; we have Jerry Cummings from the Compensatory Education Program in the Title One Policy and Accountability Office. We also have Therese Tiab, from the English Learner Accountability Unit. Also, Jeff Breshears, from the Neglected or Delinquent Program in the Title One Programs in Partnerships Office. And last but not least, we also have Carol Dickson from the Compensatory Education Program in the Title One Programs in Partnerships Office. They are Education Program Consultants from the California Department of Education who know this particular program instrument very well. And my name is Ramiro Nava. I am the Region Eight Team Leader and also the moderator for this CPM session. Okay, let's get started. The first item we are going to look at is CP 5; this item talks about the School Site Council taking action on the single plan for student achievement. Jerry, what is program improvement going to look for in this item?

>> Jerry Cummings: For Cross Program Five, the Program Improvement School Operating programs that are funded through the consolidated application must form a School Site Council which we'll refer too often as the SSC. Their job is to develop the single plan for student achievement. This plan must contain the goals developed as a result of the analysis of student academic data; the strategies that have to be addressed for the needs of students not yet proficient at academic standards include proposed expenditures of funds and evaluation of the planned academic strategies. The responsibility of the School Site Council also extends to ensure that these items that are delineated in Cross Program Five are specifically addressed. These items include the following: a, the analysis of academic performance data to determine student needs; b, school goals to meet the identified academic needs of students; c, activities to reach student school goals that improve academic performance of students; d, expenditures of funds allocated to the school through the consolidated application; and finally, e, the means of annually evaluating the progress of programs towards accomplishing the goals, including whether the needs of all children have been met by the strategies that are used and particularly the needs of lower-achieving students and those at risk of not meeting state academic content standards. The School Site Council begins by reviewing the contents of the existing single plan for student achievement. They should request from the district administrators the district schedule and timeline for the process of developing the single plan for student achievement for the coming year. Additionally, the School Site Council will need to review a number of documents or reports. Some of those include evaluation data, budget information, needs assessments, student performance data both at the district-wide level and the school level, a copy of the local education agency plan or the local educational agency plan addendum. They may look at district-wide plans and any other district planning, such as a technology plan. That will assist the School Site Council to understand the mission and goals of the district. Then the School Site Council will organize and develop their schedule of meetings based on the district-approved timeline for the development of the single plan for student achievement. To assist them, the School Site Council may request various district and/or

school-level administrators to provide presentations to help them conduct their annual review. To determine if the School Site Council has reviewed, updated, and approved the single plan for student achievement, some of the documentation that the program improvement reviewer may want to look at--it could include or will include the single plan for student achievement, the School Site Council agendas and the minutes, the consolidated application, school-level budgets and expenditures as well as the LEA plan which I spoke of earlier and there will be interviews with the site council members as well as interviews with school administrators and additional staff members.

>> Ramiro Nava: Thank you, Jerry. Therese, what is the English Learner Program going to be looking for in this item?

>> Therese Tiab: The English Learner reviewer would be focusing on making sure goals for the English Learner Program are appropriately delineated and that the funding sources, EI-LET and Title Three, are listed alongside allowable activities in that document. In addition to the analysis of some of the assessment results, the SSC may show that they're reviewing the EL's progression towards English proficiency along with all the other assessment data they are looking at.

>> Ramiro Nava: Therese, thank you. Jeff, what is Neglected or Delinquent going to be looking for?

>> Jeff Breshears: N or D would look to see if the site is receiving Title One Part D funds. And if they are, we would make sure that goals and objectives related to this program are included in the single plan for student achievement.

>> Ramiro Nava: Okay, thank you. Carol, what about compensatory education?

>> Carol Dickson: Well, first of all, Ramiro, I'd like to clarify for our listening audience that the instrument titled Compensatory Education and affectionately referred to as CE actually deals with two programs. Title Part A, Basic and Economic Impact Aid State Compensatory Education or better known as EIA State Comp Ed or EIASCE. From the point of view of the Comp Ed reviewers reviewing these two programs, it's important to ensure that there's a system in place for providing for parent input and parent opinion in the process of working with the single plan for student achievement. As the district's creating a system for parent input, it's critical that the district ensure that there's input from Title One parents. In August, the United States Department of Education reminded all the fifty states to ensure that there is Title One parent input in the school planning process and most importantly, the planning process that has to do with school improvement.

>> Ramiro Nava: The next item is CP 6. CP talks about the School Site Council composition. Therese, what is the English Learner going to be looking for?

>> Therese Tiab: Well, Ramiro, the School Site Council must be composed of the principal and representatives of teachers selected by teachers of the school, other school

personnel selected by other school personnel at that site, parents of pupils attending the schools elected by such parents; and in secondary schools, pupils selected by pupils attending the school. At the elementary school, composition parity must exist between the school personnel side and the parent community side. At the secondary school, composition parity must exist between the school personnel side and the parent community member's side. This model including pupils along with parents and community members, again, keeping in mind that parity must also exist between the students and the parent community members within the school site side. In both the elementary and secondary models, teachers must represent the majority on the school personnel side of the council. An employee of a school who is also a parent or a guardian of a pupil who attends a school other than the school of the parent's employment is not disqualified--disqualified by virtue of the employment from serving as a parent representative on the SSC at his or her child's school. The SSC is a decision-making group and it is reviewed by the English Learner Program .

>> Ramiro Nava: Okay, thank you. Jeff, Neglected or Delinquent, what would they be looking for?

>> Jeff Breshears: Well, middle schools can choose--Neglected or Delinquent would look at the School Site Composition as anyone else but I like to point out that middle schools can choose which model they would like to follow. Is it the elementary model or the secondary model? And then, I also like to point out a very common mistake that's made at the elementary level is to have a School Site Council made up of eight members. They do this by making a mistake of not including teachers as the majority of the school site. The minimum number or the minimum size of School Site Council can be, in the elementary side, is ten members and then there would be twelve members as the minimum size for secondary schools.

>> Ramiro Nava: Okay, thank you. Carol, Compensatory Education, what would they be looking for?

>> Carol Dickson: Well, some principals and staff members of very small schools have a concern. They're unable mathematically to come up with ten or twelve members per School Site Council. There may be only one or two teachers in the entire staff of the school. Some examples might be continuation schools, alternative schools, community day schools, and necessary small schools. In that case, the school should file a waiver with the CTE Waivers Office. Through the waiver process, you may propose or the school may propose a number of School Site Council members that meets their particular local needs.

>> Ramiro Nava: On to the next item, CPA; this item talks about inventory equipment that cost \$500 or more per item. Jeff, can you tell us about that please?

>> Jeff Breshears: Sure. Each LEA must maintain inventory records for all equipment purchased with categorical funds with a value of \$500 or more. The records must include type, model, serial number, funding source, acquisition date, cost, location, current

condition, and the transfer, replacement, or disposition of obsolete or unusable equipment .Further, the law requires the LEA to conduct a physical check of the inventory at least every two years and then reconcile the result of that check with the inventory records.

>> Ramiro Nava: Thank you. Carol, please tell us more about that.

>> Carol Dickson: well, Ramiro, Comp Ed programs have found that a frequent cause of not meeting the legal requirement is that just one or two categories are missing from the district's inventory system. The categories that are most frequently missing are current condition and disposition of obsolete equipment. All the categories don't have to be represented on a single print-out. However, the district should be able to pull the information for all the categories from some place in some manner in their data system to be able to show it to reviewers.

>> Ramiro Nava: Thank you. Jerry?

>> Jerry Cummings: I would add that, oftentimes, we will find not only a district inventory list but we'll find the school-level inventory list as we visit our program improvement schools. We encourage the districts to be sure that those lists are coordinated so that we can use both lists in terms of determining that they are meeting this requirement.

>> Ramiro Nava: Thank you, Jerry. Therese?

>> Therese Tiab: Ramiro, the English Learner reviewer likes to make sure that the equipment purchased with EI-LET funds is indeed being used by English Learners or by staff providing services to the English Learner Program.

>> Ramiro Nava: The next item, CP talks about disbursement of categorical funds and it also talks about 85% for direct services. Carol, what will CE be looking for?

>> Carol Dickson: In regards to disbursing funds in accordance with the approved consolidated application, let's take an example from Con Ap Part Two, the part that's due January 31. The Con Ap Part Two page that I'm going to use as an example is titled "District Allocation of Title One, Part A Funds to Schools." On the page, there is an amount listed for each school that receives Title One funds. There's an amount for Title One Part A, the basic grant portion, and an amount for Title One Part A Parent Involvement. Let's say Con Ap Part Two lists Sand Dunes Middle School is receiving \$88,000 in Title One Part A basic funds and \$2,000 in Title One Part A Parent Involvement funds. A Title One programs reviewer will look for the budget pages of the single plan for student achievement. In the case just described, there should be a place on Sand Dunes Middle School's single plan budget pages that shows \$88,000 as the starting amount for the school's Title One Part A budget and \$2,000 as the starting amount for the school's Title One Part A Parent Involvement budget. What reviewers have found is that at some schools, the budget amounts and the single plan don't match the amounts on the Con Ap Part Two district allocation pages. At a few schools, the single plan has no

budget pages at all. To meet the legal requirements in this area, a single plan for student achievement should have budget pages in the document that's presented to reviewers. The amount of Title One funds that is the starting Title One allocation amount on the school's budget pages for both Part A Basic and Part A Parent Involvement should be the same as the amount of Title One funds allocated to the school on the Con Ap Part Two page. A helpful organizational practice for districts would be to provide schools with a copy of the Con Ap Part Two page for inclusion in their single plan budget pages. Another helpful organizational practice would be for LEAs to provide their schools with a template for calculating school budget amounts based on subtractions from the Con Ap Part Two starting amounts.

>> Ramiro Nava: Carol, this item also talks about the LEA using 85% of categorical funds for direct services to students. Can you tell us more about that?

>> Carol Dickson: In many instances, the LEA has already set aside the 15% legally available to them to use for indirect services for Title One programs. This is done on the Con Ap Part Two page titled "District Allocation of Title I part A Funds." If this is the case, the entire amount allocated to schools must be used for direct services to students. This item has been found to not meet legal requirements when, for example, a school site uses its Title One funds to pay a teacher who handles budgets, planning, and administrative activities, or when the school uses some of its Title One to pay a person to do clerical work. If the LEA has not set aside the full 15% of Title One funds available to use for indirect services, the LEA may contribute to the indirect services needs of school sites as long as the total indirect services amount expended for the entire LEA does not exceed 15%. It's helpful for LEAs to put in place systems that demonstrate to reviewers the amounts used for direct and indirect services of both district and school levels. It would also be helpful to reviewers and LEAs if the system includes duty statements with current job descriptions. However an LEA chooses to demonstrate to reviewers the systems that has in place to ensure that 85% of its Title One funding is used for direct services to students, it will be helpful and less stressful for LEA staff if LEA staff is prepared in advance to describe the systems the district has put in place to ensure that their schools are compliant with the 85% direct services mandate.

>> Ramiro Nava: Carol, thank you very much. Jerry, program improvement, what would they be looking for?

>> Jerry Cummings: For program improvement schools, often, the staff providing these direct services may be from the district level or at the school-site level. So as Carol indicated, we'll be looking at duty statements. In addition to that, we'll be interviewing those staff persons to ensure that the duties are actually being performed.

>> Ramiro Nava: Thank you. Therese, English Learner Program .

>> Therese Tiab: Yes, Ramiro. Because economic impact aid may be separated into two different categories by the district, SCE and LET, the EL reviewer will be looking to see that EI-LET funds have been dispersed to each site in accordance with the consolidated

application. As for the 85% rule, again, the EL reviewer will want to verify that the EL-LET funds are being used for direct services to students, 85% of them.

>> Ramiro Nava: Therese, thank you. Jeff?

>> Jeff Breshears: The Title One Part D funds are subject to the same 85-15 that has been so well-explained.

>> Ramiro Nava: CP eleven talks about categorical funds supplementing and not supplanting. Jerry, can you please tell us about that?

>> Jerry Cummings: Yes, Ramiro. A local education agency shall use the State and Federal categorical funds which they receive through the Con Ap only to supplement. That is to be used in addition to funds which are made available from the general fund source. This item requires the LEA to use the categorical funds from these specific programs that are listed in this item only to supplement and not supplant State and local funds. The programs listed in the item include but are not limited to Title One Part A and Economic Impact A. Categorical funds are to be used in addition to other state and federal local funds to provide additional educational services to meet the needs of the eligible students. The LEA must use the state and local funds to provide for the required educational services. Thus, the categorical funds are used to augment the regular educational program. By using categorical funds or federal funds in this manner to provide the additional services for the eligible students, the LEA can ensure that it is supplementing that regular program and not replacing the required programs with these federal categorical funds. As it is stated in the office of management and budget circular A-133 compliance supplement; and I quote, it says, in other words, the LEA shall use federal funds received only to supplement the funds that would in the absence of such federal funds be made available from non-federal sources for the education of people participating in programs and not to supplant such funds.

>> Ramiro Nava: Jerry, thank you. Therese, EL program.

>> Therese Tiab: Yes, Ramiro. The English Learner reviewer would want to make sure that the district is not supplanting the teaching of ELD. ELD is a core subject that needs to be funded from general funds.

>> Ramiro Nava: Thank you. Jeff, N or D program.

>> Jeff Breshears: Title One Part D funds are categorical funds and therefore, they are subject to supplement versus supplant rules.

>> Ramiro Nava: Thank you. Carol, CE.

>> Carol Dickson: It's helpful to keep in mind that the Comp Ed reviewer will be focusing on the purpose of Title One and state compensatory education funds which is to ensure that all students reach proficiency.

>> Ramiro Nava: The next item, CP talks about direct and indirect salary cost, time accounting. Therese, please tell us more.

>> Therese Tiab: The English Learner Program reviewer looks at this item keeping in mind Title Three and EI-LET funding. There are two official forms that districts can use to assess the administrative charges for direct or indirect cost. The semi-annual certification and the personnel activity report are known as PAR. If the employee is solely funded from one categorical program, he or she completes the semi-annual certification. If the employee is multi-funded from two or more categorical programs, he or she needs to complete a PAR. For any employee funded with categorical funds, their duty statements needs to support the individual funded from that categorical program and the percentage of time dedicated to the specific categorical program needs that match their responsibilities. From the English Learner perspective, that employee must spend the correct amount of time providing activities to the English Learner Program.

>> Ramiro Nava: Thank you, Therese. Jeff?

>> Jeff Breshears: Another aspect of this item that the N or D programs looks at is whether the LEA has assessed its administrative charges as well as director indirect charges in proportion that are allowed by statute.

>> Ramiro Nava: Thank you. Carol?

>> Carol Dickson: Compensatory education reviewers may ask LEAs and schools to provide duty statements from employees. These would be used to confirm the percentage of time spent on various activities reported on district time accounting documents.

>> Ramiro Nava: Thank you. Jerry?

>> Jerry Cummings: The program improvement schools, they are all required to continue and meet all the requirements that have just been stated by my colleagues. I would only add that it is important that the school-level administrators also be aware of the time-accounting requirements that expedite the review.

>> Ramiro Nava: Okay. On to the last item, which is CP 15. This item calls for the LEA in School Site Council annually evaluating the SPSA. Jeff, please tell us about that item.

>> Jeff Breshears: the process and procedure the LEA and the School Site Council use to annually evaluate program effectiveness will be reviewed by CPM team members. On an annual basis, the LEA and school-site council must determine if the needs of all children have been met by the strategy used, particularly the needs of low-achieving students and those at risk of not meeting state academic contents standards. The strategies indicated in this item refer to strategies identified in the single plan for student achievement and the means of evaluation have also been identified in that single plan. The LEA and the

school-site council must use the analysis of verifiable data to conduct this review and then use this information to modify and improve the programs.

>> Ramiro Nava: Jeff, thank you. Carol, what will CE be looking for?

>> Carol Dickson: well, Ramiro, what will be helpful for all of us both reviewers and those on the field to keep in mind, that the U.S. Department of Education in August was quite clear in their message to the States. They are expecting to see involvement and input specifically from Title One parents on any annual evaluation of academic achievement needs.

>> Ramiro Nava: Thank you. Jerry, program improvement?

>> Jerry Cummings: For program improvement schools, the LEA has a responsibility to assist the schools in carrying out their programs and strategies. That process that the LEA uses can be used as the means to help evaluate the effectiveness of those strategies and assist the school-site council to carry out their responsibilities in the program improvements schools to conduct this evaluation.

>> Ramiro Nava: Thank you. Last but not least, Therese, EL?

>> Therese Tiab: Thank you, Ramiro. The EL review would like to make sure that the appropriate modifications to the program has been implemented as a result of the findings of the evaluation; and that the evaluation mechanism in place demonstrates the progression of English Learners towards English proficiency and achievement of content standard.

>> Ramiro Nava: Okay. Thank you very much. That concludes the Cross Program instrument items presentation of this CPM session.