

## CFP Comprehensive Monitoring Guide

This document is intended to prepare Vermont's Local Educational Agencies (LEAs) on what to expect when going through the CFP Comprehensive Monitoring. Each header below corresponds with a tab that will be available within the Grants Management System (GMS). The tabs will show only if that particular section is applicable for the LEA, for example the Targeted Assistance School tab will not appear if the LEA does not contain any Targeted Assistance Schools. When the LEA is selected for the comprehensive monitoring, they will use GMS to answer the corresponding questions and provide the corresponding documentation/evidence.

### Data and Assessed Needs

#### Requirements:

- The LEA must develop a comprehensive needs assessment to inform CFP investments, involving various stakeholders (2 CFR 200.403; ESEA 1114(b); ESEA 2102(b)(2); ESEA 4106(c)(d)).
- The LEA must evaluate the effectiveness of funded activities annually (ESEA 1114(b)(3); ESEA 2102(b)(2)(D); ESEA 4106(e)(1)(E)).

#### Documentation to Upload:

1. Evidence of the participation of various stakeholders in the Data Inventory process.
2. Examples of protocols or processes used to collect and analyze LEA and school data to inform the LEA's Data Inventory.
3. Evidence of measures used to annually evaluate the effectiveness of CFP investments.

#### Guiding Questions:

Guiding Question #1: Describe the process by which various stakeholders were engaged in the process of developing the LEA's Data Inventory.

Guiding Question #2: What protocols or processes are used to collect and analyze the LEA and school data that inform the LEA's Data Inventory?

Guiding Question #3: What measures are in place to evaluate the effectiveness of specific CFP investments, both at the LEA and school level? How do these measures inform investments in subsequent years?

### Services to Independent Schools

#### Requirement:

#### Contact Information:

If you have questions about this document or would like additional information please contact:  
Karen Abbott, Consolidated Federal Programs, at [karen.abbott@vermont.gov](mailto:karen.abbott@vermont.gov)

- The LEA engages in timely and meaningful outreach and consultation with all eligible independent schools and provides equitable services in accordance with federal requirements (ESEA 1117; ESEA 8501).

### **Documentation to Upload:**

1. Invitations to participate sent to officials at eligible independent schools both within and beyond the LEA's boundaries and records of responses.
2. Documentation of timely and meaningful consultation with participating schools.
3. Evidence of ongoing communication with participating schools concerning implementation of strategies and satisfaction with equitable services provided.

### **Guiding Questions:**

Guiding Question #1: Describe the LEA's process for identifying eligible (non-profit, approved or recognized) independent schools both within the LEA's boundaries (Titles I, II, III and IV) and beyond the LEA's boundaries (Title I).

Guiding Question #2: Describe the LEA's process for consulting with eligible schools that wish to participate in equitable share. How are decisions made concerning independent school data, needs and service delivery?

Guiding Question #3: How does the LEA ensure that all funds and materials purchased remain in the control and possession of the LEA?

Guiding Question #4: How does the LEA ensure that funds for equitable participation are fully obligated in the year in which they are received?

Guiding Question #5: How does the LEA ensure that all services and materials provided are secular, neutral and non-ideological?

Guiding Question #6: How does the LEA ensure that services are only provided directly by employees of the LEA or by contract with private or public organizations?

## **McKinney Vento**

### **Requirement**

- In accordance with the McKinney-Vento Homeless Assistance Act (42 U.S.C. Chapter 119, Subchapter VI, Part B: Education for Homeless Children and Youth), the LEA ensures that students experiencing homelessness receive equal access to the same free, appropriate public education, including public preschool, as other students (§11431(1)), removes barriers that homeless students face when enrolling, attending and succeeding in school (§11431(2)), and ensures that students experiencing homelessness have access to all services for which they are eligible and need in order to have an opportunity to meet the same challenging State academic standards to which all students are held (§11431(4)).

### **Documentation to Upload**

1. Documentation that an appropriate staff person has been designated as the LEA Homeless Liaison to carry out the duties described in the MV Act (e.g., directory, website, materials/posters that identify liaison, etc.) §11432(g)(1)(J)(ii)
2. Documentation of processes/procedures and any forms used to ensure the identification of students experiencing homelessness and the reporting of complete and accurate data to the SEA (e.g., enrollment forms, residency questionnaires, evidence of collaboration with other LEA programs, procedures for ensuring that students identified as homeless are entered as such into the student information system, etc.) §11432(g)(6)(A)(i) and §11432(g)(6)(C)
3. Documentation of processes/procedures for removing barriers (e.g., LEA policy regarding homeless students, evidence of procedures for immediate enrollment, enrollment forms, collaboration with other LEA programs, etc.) §11432(g)(1)(I)
4. Documentation of the LEA-level dispute resolution procedure and any forms used during the appeal and dispute resolution process (e.g., written notification, dispute forms for family/youth to begin appeal process, dispute resolution procedure, etc.) §11432(g)(6)(A)(viii)
5. Evidence that the LEA provides public notice of the educational rights of students experiencing homelessness (e.g., posters, flyers, brochures, public notice on website, handbooks, etc.) §11432(g)(6)(A)(vi)
6. Evidence of outreach to and coordination with relevant community groups (e.g., agendas, meeting minutes, handouts, documentation of participation in local CoC, coordination with State and local housing agencies, community resource guide, referrals to community agencies, data on number/percent of parents or youths referred to community services, etc.) §11432(g)(5)
7. Evidence of procedures for providing transportation, at the request of the parent, guardian, or youth, to and from the school of origin, and for determining excess transportation costs for students experiencing homelessness, if using Title IA to pay for transportation expenses (e.g., transportation referral forms, school selection forms with transportation request, transportation agreements, cost reimbursement forms, etc.) §11432(g)(1)(J)(iii) and ESEA §1113(c)(3)(C)(ii)(II)

### **Guiding Questions**

Guiding Question #1: How does the LEA inform families/unaccompanied youth of the educational rights of students experiencing homelessness? How are parents/guardians of homeless students informed of opportunities to participate in educational decisions? §11432(g)(6)(v)

Guiding Question #2: What McKinney-Vento professional development activities did the liaison participate in? How do LEA and school personnel receive information and training on rights and needs of homeless students? Which personnel is included in trainings? §11432(g)(1)(J)(iv) and §11432(g)(6)(A)(ix)

Guiding Question #3: Describe the process for identifying and enrolling students experiencing homelessness. What policies or procedures does the LEA currently have in place to eliminate barriers to the enrollment, attendance, and success of homeless students? §11432(g)(6)(A)(i) and §11432(g)(1)(I)

Guiding Question #4: How does the LEA conduct best interest determinations? §11432(g)(3)(A) and §11432(g)(3)(B)

Guiding Question #5: How does the LEA resolve eligibility, school selection, and enrollment disputes? §11432(g)(3)(E)

Guiding Question #6: What process does the LEA have in place to ensure that students experiencing homelessness are provided transportation to and from the school of origin, if requested? §11432(g)(1)(J)(iii)

Guiding Question #7: How does the LEA ensure that students experiencing homelessness receive access to all services to which they are entitled, including Title I services, free meals, Special Education, English Learner, extracurricular activities, and all early education programs, including Head Start and early intervention? §11432(g)(4) and §11432(g)(6)(A)(iii)

Guiding Question #8: How does the LEA collect information to determine the ongoing needs of homeless students? How does the LEA ensure that programs are effective in meeting the identified needs of homeless students? §11432(g)(1)(B), §11432(g)(6)(A)(ii), and §11432(g)(6)(A)(iv)

Guiding Question #9: What process does the LEA have in place to ensure homeless children and youth are achieving proficiency? How does the program address any gaps? §11432(g)(1)(A)

Guiding Question #10: How does the LEA determine the amount needed for Title IA homeless set aside funds? What process does the LEA use to determine how to spend Title IA homeless set aside funds? ESEA §1113(c)(3)(A)(i) and §1113(c)(3)(C)(i)

Guiding Question #11: How does the LEA coordinate with community partners and ensure that community agencies serving homeless individuals are made aware of the rights of homeless students? What community partnerships have been established to provide a coordinated approach to the identification and referral of children and youth experiencing homelessness? §11432(g)(5)

Guiding Question #12: What practices are currently in place to ensure that students are not stigmatized based on their status as homeless? How does the rate of suspensions and/or expulsions for students experiencing homelessness compare to other groups? §11432(g)(1)(J)(i)

## **Parent and Family Engagement (PFE)**

### **Requirement:**

- The LEA and all participating schools must meet the parent and family engagement requirements as described in Section 1116 of the Every Student Succeeds Act (ESSA).

### **Documentation to Upload:**

1. LEA parent and family engagement policy with documentation on how the policy was jointly developed and agreed on with Title I parents and family members. (ESEA 1116(a)(2))

2. School Parent and Family engagement policy or procedure with documentation on how the policy/procedure was jointly developed and agreed on with Title I parents and family members. (ESEA 1116(b))
3. Title I schools' Parent-School compacts with documentation on how the compact was jointly developed with, agreed on with, and disseminated to Title I parents and family members. (ESEA 1116(d))
4. Documentation of the Annual Evaluation of Parent and Family Engagement LEA Policy effectiveness with meaningful involvement of parents and family members (ESEA 1116(2)(D)). Documentation may include a summary of data analyzed or the LEA's process to collect information to determine the effectiveness of policies and practices (school surveys, parent feedback, parent advisory groups, evaluations from parent workshops, etc.).
5. Title I Annual Meeting documentation to include content of the meeting itself as well as invitations/notices showing that all parents of participating children were invited and encouraged to attend. If targeted assistance school, documentation should include parental sign-in sheet showing attendance of Title I parents. (ESEA 1116 (c)(1))

### **Guiding Questions:**

Guiding Question #1: Describe how the LEA and each applicable Title I school(s) provide assistance so that parents can understand student achievement assessments and how to work with educators to improve the achievement of their child (ESEA 1116(e)(1))?

Guiding Question #2: Describe how the LEA and each applicable Title I school(s) provide materials and training to help parents work with their children to improve their children's achievement (ESEA 1116(e)(2))?

Guiding Question #3: Describe how the LEA and each applicable Title I school(s) educate teachers, school leaders and other staff on the value and utility of working with parents as equal partners. (ESEA 1116(e)(3))

Guiding Question #4: Describe how the LEA and each applicable Title I school(s) coordinate and integrate parent and family engagement programs and activities with Federal, State and local programs including public preschool programs (ESEA 1116(e)(4))?

Guiding Question #5: Describe how the LEA and each applicable Title I school(s) ensure that information related to school and parent programs, meetings and other activities is sent to parents in a format and in a language the parents can understand (ESEA 1116(e)(5))?

Guiding Question #6: Describe how the LEA and each applicable Title I school(s) provide other reasonable support for parent and family engagement activities as parents may request (ESEA 1116(e)(14))?

Guiding Question #7: What plan is in place to determine when to update the School Parent and Family Engagement Policy/Procedure and how parents will be involved? (ESEA 1116 (b)(1))

Guiding Question #8: How are parents involved in an organized, ongoing, and timely way, in the planning, review, and improvement of Title I programs and activities?

(ESEA 1116(c)(3))

Guiding Question #9: Describe how Title I parents and family members provide input regarding how funds may be spent for parent and family engagement activities. (ESEA 1116(a)(3)(B)).

## **Schoolwide Programs (SWP)**

### **Requirement:**

- The LEA must ensure that participating schoolwide program schools are meeting all requirements under ESEA Section 1114.

### **Documentation to Upload:**

1. Schoolwide Program Plan for each SWP school

### **Guiding Questions:**

Guiding Question #1: How has the LEA ensured that each participating SWP schools have involved all relevant stakeholders and parents in the development of the SWP Plan(s)? (ESEA 1114(b)(2))

Guiding Question #2: How does the LEA ensure that all schoolwide program plans are based on the school's comprehensive needs assessment? (ESEA 1114 (b)(6)).

Guiding Question #3: How does the LEA ensure that all SWP Plans are regularly monitored and revised to address the specific needs of their students? (ESEA 1114 (b)(3)).

Guiding Question #4: How was the decision made to become a schoolwide program(s)? (ESEA 1114)

Guiding Question #5: How is it determined which funding sources to consolidate in the Schoolwide Program pool? (ESEA 1114)

## **Targeted Assistance Schools**

### **Requirement:**

- The LEA must ensure that all targeted assistance programs are meeting all requirements under ESEA 1115.

### **Documentation to Upload:**

1. Targeted Assistance Plans for each school describing methods used for selecting the Title I caseload and how services are delivered.
2. List of the Title I caseload including student's grade and Title I assessment.

### **Guiding Questions:**

Guiding Question #1: Describe how the LEA's Title I Targeted Assistance programs identify students for participation (the Title I caseload) on the basis of multiple, educationally

related, objective criteria established by the local educational agency and supplemented by the school? (ESEA 1115 (c)(1)(B))

Guiding Question #2: How do the LEA's Targeted Assistance Programs ensure the inclusion of those automatically eligible for services (children who have participated in Head Start, migrant children, children served in an institution for neglected or delinquent, or those who are homeless)? (ESEA 1115(c)(2)(A-E))

Guiding Question #3: How do the LEA's ensure each participating Title I school(s) Targeted Assistance programs give consideration to providing expanded learning time, before and afterschool programs, and summer programs and opportunities? (ESEA 1115 (b)(2)(B)(i))

Guiding Question #4: How do the LEA's ensure each participating Title I school(s) Targeted Assistance Programs review the progress of eligible children and revise the program to enable such children to meet the challenging State academic standards? (ESEA 1115 (b)(2)(G)(iii))

## **Title I, Part A**

### **Requirement:**

- The LEA must monitor the participating schools' use of Title I funds to ensure compliance with Title I Program requirements under ESEA (1111, 1112, 1113, 1114, 1115, 1116, 1117, 1118, 1119).

### **Documentation to Upload:**

1. Documentation of guidance around Title I requirements given to participating schools.
2. Dated notice to parents regarding their right to request their child's teacher's qualifications for each Title I school (ESEA 1112(e)(1)).

### **Guiding Questions:**

Guiding Question #1: How does the LEA ensure that teachers and instructional paraprofessionals in Title I programs meet applicable state certification and licensure requirements? (ESEA 1112 (c)(6)).

Guiding Question # 2: Describe how the LEA assists each Title I school in developing and/or identifying high quality, effective curricula and instructional strategies that strengthen the academic program and improve school conditions for student learning? (ESEA 1112 (b)(1)(D))

Guiding Question # 3: Describe how the LEA integrates Title I services with other educational services from the LEA and individual schools in order to increase program effectiveness and eliminate duplication? (ESEA 1112 (c)(4))

Guiding Question # 4: If the LEA provides early childhood services under their Title I program, describe how they ensure compliance with the performance standards of Head Start. (ESEA 1112 (c)(7))

Guiding Question #5: Describe how the LEA serves under Title I those eligible students enrolled in non-profit independent schools and qualified Title I early education programs? (ESEA 1112 (c)(2), ESEA 1115 (c))

## **Title II, Part A**

### **Requirement:**

- The LEA utilizes Title IIA funds to support the intents of Title II, Part A as defined in ESEA section 2103(b).

### **Guiding Questions:**

Guiding Question #1: Please describe how the LEA uses Title II, Part A funds to provide high quality, personalized and needs-based professional development activities aligned to Vermont standards, including providing training on:

- Effectively teaching children with disabilities, including children with significant cognitive disabilities and English learners (ESEA section 2103(b)(3)(J)(i-ii))
- Providing high-quality content-area-specific instruction and instructional leadership (ESEA section 2103(b)(3)(L))
- Understanding and using data and assessments to improve classroom practice and student learning (ESEA sections 2103(b)(3)(E)(ii) and 2103(b)(3)(L))
- Selecting and implementing formative assessments, designing classroom-based assessments and using data from such assessments to improve instruction and student academic achievement (ESEA section 2103(b)(3)(H))

Guiding Question #2: How has the LEA uses Title II, Part A funds to develop or improve a rigorous, transparent and fair evaluation and support system for teachers, principals and other school leaders as defined in ESEA section 8101(A)(44)? (ESEA sections 2101 (c)(4)(B)(ii) and 2103(b)(3)(A)). If not using Title II, Part A funds for this purpose, please write "N/A."

Guiding Question #3: How has the LEA uses Title II, Part A funds to recruit, hire and retain effective teachers, especially in schools with a large number of at-risk students, and to improve within-LEA equity in the distribution of effective teachers? (ESEA sections 2101(c)(4)(B)(v) and 2103(b)(3)(B)). If not using Title II, Part A funds for this purpose, please write "N/A."

Guiding Question #4: How has the LEA used Title II, Part A funds to support teachers, teacher leaders, early childhood educators and other instructional staff to meet the needs of students through age 8, which may include professional development and planning activities for LEA teachers and educators in preschool programs that address the transition to elementary school? (ESEA section 2103(b)(3)(G)). If not using Title II, Part A funds for this purpose, please write "N/A."

## **Title IV, Part A**

### **Requirement:**

- The LEA monitors the participating school's use of Title IV, Part A funds to ensure compliance with program requirements under ESEA section 4106.

### **Guiding Questions:**

Guiding Question #1: Describe the process by which the LEA assesses needs for the three content areas of Title IV. How often is a needs assessment for Title IV completed? Who is involved in that process? (ESEA §4106(d))

Guiding Question #2: Describe the process by which the LEA determines how Title IV funds are to be distributed among schools. How does the LEA prioritize the distribution of Title IV funds to schools served by the LEA? (ESEA §4106(e)(2)(A))

Guiding Question #3: How does the LEA evaluate the effectiveness of Title IV-funded activities? (ESEA §4106(e)(1)(E))

Guiding Question #4: How does the LEA involve stakeholders in the development and implementation of the Title IV program? What stakeholders are included? (ESEA §4106(c)(1-2))

Guiding Question #5: Describe the procedures by which the LEA obtains prior written, informed consent from the parent of each child who is under 18 years of age to participate in any mental-health assessment or service that is funded under Title IV, Part A and conducted in connection with an elementary school or secondary school under Title IV, Part A. (ESEA §4001(a)(1)(A))