Introduction/Background - Introduction

Introduction

Each Local Educational Agency (LEA), as a condition of receiving funds under the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA), has provided assurances to the New York State Education Department (NYSED or "the Department") within its Consolidated Application for ESSA-Funded Programs.

The 2023-24 Desk Review process is designed to review the District's implementation of programs to ensure that the District is fulfilling the assurances and program plans provided in the Consolidated Application for ESSA-Funded Programs, with the goal of ensuring that all children are provided significant opportunities to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.

The 2023-24 Desk Review Indicators and Evidence Guide should be used as a guide to gather meaningful evidence that demonstrates how the district began with needs identification, progressed through implementation of targeted strategies designed to meet identified needs, and evaluated the effectiveness of programs or strategies sourced with ESSA funds.

Questions may be directed to Office of ESSA-Funded Programs Staff at (518) 473-0295. Thank you for your cooperation.

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Background/Instructions

Federal/State Program Requirement Quality Indicators

This review is divided into three sections and identifies district level programmatic and fiscal requirements under ESEA, as well as additional quality indicators/practices. Within each section there are general requirements which apply to all ESEA-Funded Programs as well as program specific requirements.

- Section 1 Programmatic Compliance
- Section 2 Equitable Services Compliance
- Section 3 Fiscal Compliance

Instructions

Please upload material aligned with the appropriate indicator. The "2023-24 Desk Review Indicators and Evidence Guide" resource provides examples of evidence that may be used to demonstrate compliance with programmatic or fiscal requirements for each section and indicator within the protocol. A copy of the resource is in the Documents panel found along the left side of the screen.

The LEA should upload all documents to the business portal by the requested due date, *March 4, 2024*, to allow for ample review prior to an on-site visit. Although the NYSED Business Portal is secure, the LEA should not submit confidential personnel information.

LEAs are instructed to complete all sections, and are required to answer questions marked with a red asterisk. If a required question has not been completed, the business portal will highlight it in red and the section of the application will be flagged. The applicant will be unable to submit the application to NYSED for final review if a required question remains unresolved.

Applicants are not required to complete sections in order, and may access any section or page of the application by clicking on one of the links in the Survey Navigation, or by clicking on the 'Save & Continue' button.

Please refer to the Documents panel of the application for additional information and access to forms and worksheets.

Compliance Status Definitions

- · Met Requirements indicates that the LEA documents reviewed were fully in compliance with federal and State requirements.
- Met Requirements with Recommendation indicates that the LEA documents reviewed were in compliance with federal and State requirements, but that the LEA may improve the quality of their program implementation and/or documentation by implementing the NYSED-provided recommendations. Recommendations serve as technical assistance and the LEA is not required to take immediate action.
- <u>Partially Met Requirements with Required Action</u> indicates that the LEA documents reviewed were substantially in compliance with federal and State requirements, but that the LEA must improve the quality of their program implementation and/or documentation by implementing the NYSED-directed action. The LEA is required to respond to a required action within its Corrective Action Plan.
- <u>Finding with Corrective Action</u> indicates that the LEA is not in compliance with federal and State requirements. The LEA must implement the NYSED-directed Corrective Action(s) within its Corrective Action Plan.

Desk Review Timeline

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Timeline, documents, and technical assistance over	rview video on the monitoring process for ESSA Funded Programs for 2023-24 are available
at https://www.nysed.gov/essa/compliance-monitor	ing-and-technical-assistance
Thursday, February 1, 2024	LEA is notified via e-mail letter that it has been selected for Desk
	Review
	Desk Review survey is available to LEA in Business Portal
Tuesday, February 6, 2024	NYSED provides technical assistance webinar on Desk Review
10:00 am – 11:00 am	Process
	Meeting ID: 890 2390 2826
	Passcode: j4YJe0
Tuesday, February 20, 2024	NYSED will hold an office hours session for questions about
1:00 pm – 2:00 pm	completing the Desk Review
	Meeting ID: 854 2298 4027
	Passcode: wzJN87
Monday, March 4, 2024	LEA submits completed Desk Review survey to NYSED in the
	Business Portal
April 4 – August 31, 2024	LEA will receive final ratings from NYSED within approximately 30
	days
	LEA will then have 30 days to complete Corrective and Required
	Actions
	The LEA maintains communication with the reviewer regarding
	Required or Corrective Actions that need more time to complete
No later than October, 2024	The LEA completes any remaining Required or Corrective Actions,
	including those that involves BOE approval for policy changes
	If the LEA does not complete remaining Required or Corrective
	Actions, the reviewer will involve the Superintendent in the resolution of
	the review
November, 2024	If the LEA does not complete remaining Required or Corrective
	Actions, the reviewer will involve the BOCES Superintendent in the
	resolution of the review
	The 2024-25 Consolidated Application for ESSA-Funded Programs wil
	not be approved until the Desk Review is completed and approved

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Program Area Contact Information

 To facilitate the review process, please indicate the most appropriate contact person for each of the following ESEA Programs.

	Contact Name/Title	Contact Phone Number	Contact Email
Title I, Part A			
Title I, Part C			
Title I, Part D			
Title II, Part A			
Title IV, Part A			
Foster Care Liason			
McKinney-Vento Liason			
Neglected/Delinquent Transition Liaison			

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General Programmatic Compliance Requirements

 The 2023-24 Consolidated Application for ESEA-Funded Programs is developed with timely and meaningful consultation with appropriate stakeholders, as defined under each respective part.

ESEA Section 1112(a)(1)(A); 2102(b)(3)(A); and 4106(c)(1)					
	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or	
		Upload(s	Assistanc	less)	
)	е		
1.	☐ A combination of several pieces of		□ We		
	evidence for meetings/discussions on the		do not		
	development of this year's Consolidated		have		
	Application that informed the signatures		sufficient		
	on the Consultation and Collaboration		evidence		
	forms for each applicable program (Title		to meet		
	IA, IIA, IVA, VB).		this		
	☐ Meeting notifications; minutes; sign-in		indicator.		
	sheets with the stakeholder groups		□ We		
	identified; agendas or presentations with		would		
	the programs listed; and email exchanges		like to		
	☐ A description of evidence that		request		
	illustrates the LEA's process for engaging		technical		
	stakeholders in consultation regarding the		assistan		
	development of the Consolidated		ce on		
	Application.		this		
			indicator.		

2. All teachers and paraprofessionals working in a Title IA or ID program meet applicable State certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification.

ESEA Section 1112(c)(6)

	Recommended Evidence	Evidonos	Toohniool	LEA Comments (Optional - 50 words or
	Recommended Evidence			
		Upload(s	Assistanc	less)
)	е	
2.				
	☐ For staff working in the Title IA or ID		□ We	
	program (including those funded through		do not	
	transferability), please provide a list of		have	
	names, job titles, and relevant		sufficient	
	certifications.		evidence	
			to meet	
			this	
			indicator.	
			□ We	

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ESEA Section 1116(a)(2)

2.

Title I Parent and Family Engagement Requirements

 The LEA has a written district-level Parent and Family Engagement Policy (PFEP) that is developed jointly, mutually agreed upon, and distributed to parents and family members of participating children.

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	
)	е	
1.	_ 5	,		
	□ Board of Education approved district-		□ We	
	Level Title I Parent & Family Engagement		do not	
	Policy (PFEP) (updated under ESSA,		have	
	after 2016).		sufficient	
	☐ A combination of the following types of		evidence	
	evidence of dated joint development:		to meet	
	meeting minutes, meeting notifications or		this	
	agendas, and/or sign in sheets.		indicator.	
	☐ Evidence of distribution, any one of		□ We	
	the following: web link, newsletter, email		would	
	blast, parent handbook.		like to	
			request	
			technical	
			assistan	
			ce on	
			this	
			indicator.	
		-		
With the involvement o	f parents and family members, the LE	A annual	lly evalua	tes the content and effectiveness of
its district-level Parent a	nd Family E			Ov

Section 1 - Programmatic Compliance - Title I, Part A: Parent/Family Engagement

	1	1	
Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
	Upload(s	Assistanc	less)
)	е	
evaluation of the district-level PFEP		to meet	
☐ Evidence to show which barriers were		this	
identified by parents, what needs were		indicator.	
identified, and how the LEA responded to		□ We	
those barriers and needs (such as dated		would	
emails, minutes from administrators'		like to	
meetings, examples of outreach to		request	
address problems, etc.)		technical	
		assistan	
		ce on	
		this	
		indicator.	

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LEA Requirements

 LEAs must maintain appropriate written documentation to support the removal of a student from the adjusted graduation rate cohort.

34 CFR Section 200.19(b)(1)(i)(iv)

34 Cr N 3ection 200.19(D)(1)(1)(1V)			
	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
1.	□ Written documentation (for example,		□ We	
	request for transfers from receiving		do not	
	schools the student enrolled in another		have	
	school, or in an educational program that		sufficient	
	culminates in the award of a regular high		evidence	
	school diploma, obituaries, notes from		to meet	
	families), which confirms that a removed		this	
	student transferred out, migrated to		indicator.	
	another country, or is deceased.		□ We	
	☐ If Title I allocation is greater than		would	
	500,000, a sample size of 25%; for all		like to	
	other LEAs, all documentation		request	
			technical	
			assistan	
			ce on	
			this	
			indicator.	

2. The LEA has comprehensive protocols for transitioning students from residential facilities back to their school. ESEA Section 1423(4) and CR 100.2(ff)(a)(2)

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
2.	☐ Current written transition protocol that		□ We	
	describes the process of the LEA		do not	
	transitioning youth back into school from		have	
	residential placement.		sufficient	
	☐ The written transition protocol should		evidence	
	include a description of the roles and		to meet	
	responsibilities identified to facilitate the		this	
	prompt and appropriate enrollment of		indicator.	
	students returning to the district from a		□ We	
	residential placement.		would	
			like to	

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Section 1 - Programmatic Compliance - Title I, Part A: LEA Requirements

Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
	Upload(s	Assistanc	less)
)	е	
		request	
		technical	
		assistan	
		ce on	
		this	
		indicator.	

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Education of Migratory Children

1. Identify the practices, including the use of the *Identification and Recruitment Parent Survey*, used by the LEA to screen students upon enrollment/registration for possible eligibility for migrant education, and to refer such students to their regional METS program centers for eligibility determinations.

ESEA Section 1304(b)(3)

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
1.	Constant accordated blockfooting		- W-	
	□ Sample of completed Identification		□ We	
	and Recruitment Parent Survey (see links		do not	
	above), AND/OR		have	
	☐ Email sign-off and attestation from		sufficient	
	local METS Director		evidence	
			to meet	
			this	
			indicator.	
			□ We	
			would	
			like to	
			request	
			technical	
			assistan	
			ce on	
			this	
			indicator	

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Neglected and Delinquent Facilities

1. The LEA has protocols/procedures in place to evaluate the Title I, Part D program(s) operating at residential facilities within the district.

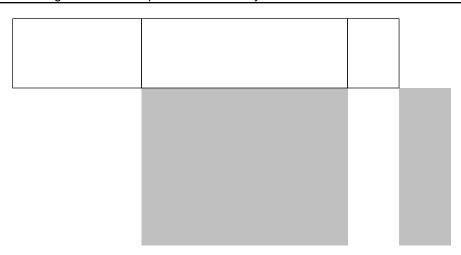
ESEA Section 1431(a)(1-5)

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
			Assistanc	
)	е	
1.	□ LEA Title I Part D evaluation		□ We	
	protocols/procedures		do not	
			have	
			sufficient	
			evidence	
			to meet	
			this	
			indicator.	
			□ We	
			would	
			like to	
			request	
			technical	
			assistan	
			ce on	
			this	
			indicator.	

McKinney-Vento Homeless Education

- 1. The LEA has an enrollment policy and practice that ensures:
 - the immediate enrollment and full participation of children and youth experiencing homelessness in the LEA even though they may not have the documents normally needed for enrollment (e.g. proof of immunizations, proof of residency, birth certificate, school records, etc.), including students with IEPs; and

Section 1 - Programmatic Compliance - McKinney-Vento Homeless Education



Foster Care Transportation

Evidence that the LEA has developed and implemented clear written procedures governing how transportation to maintain children in foster care in their school of origin when in their best interest will be provided, arranged, and funded for the duration of the time in foster care.

ESEA Section 1112(c)(5)(B)

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
1.	□ Written foster care transportation		□ We	
	procedures specific to transportation of		do not	
	foster care students		have	
			sufficient	
			evidence	
			to meet	
			this	
			indicator.	
			□ We	
			would	
			like to	
			request	
			technical	
			assistan	
			ce on	
			this	
			indicator	

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Title II, Part A: Effective Instruction

1. The LEA has prioritized the distribution of funds to schools implementing comprehensive support and improvement activities and targeted support and improvement activities and have the highest percentage of high-poverty children and those counted under section 1124 (c).

ESEA Section 2102(b)(2)(C)

	71 - 7			
	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
1.	☐ Provide some combination of chart(s)		□ We	
	of Title IIA allocations or funded activities		do not	
	at each building, AND/OR		have	
	☐ Schedules or payroll records that		sufficient	
	show prioritized assignment of coaches		evidence	
	or other IIA staff to TSI and CSI schools		to meet	
	or placement of class size reduction		this	
	teachers, AND/OR		indicator.	
	□ Documentation showing PD choices		□ We	
	are based on needs assessment in TSI		would	
	and CSI schools or those that have the		like to	
	highest percentage of high-poverty		request	
	children		technical	
			assistan	
			ce on	
			this	
			indicator.	

The LEA uses data and ongoing consultation to continually update and improve activities supported under Title II
Part A.

ESEA Section 2102(b)(2)(D)

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
2.	□ Dated building or district leadership		□ We	
	teams or PD committee meeting		do not	
	agendas, minutes, or presentations		have	
	reviewing/evaluating IIA programs to		sufficient	
	inform future program activities, AND/OR		evidence	
	□ Dated data such as teacher surveys,		to meet	
	classroom observations, student		this	
	performance, AND/OR		indicator.	
	□ Dated data coach meetings with		□ We	

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Section 1 - Programmatic Compliance - Title II, Part A: Effective Instruction

Recommended Evidence		Technical Assistanc	LEA Comments (Optional - 50 words or less)
)	е	
teachers, summaries of discussion, or topics covered, AND/OR		would like to	
□ Dated follow up walk-throughs or		request	
observations of teachers after PLC		technical	
meetings or data coaching sessions		assistan	
		ce on	
		this	
		indicator.	

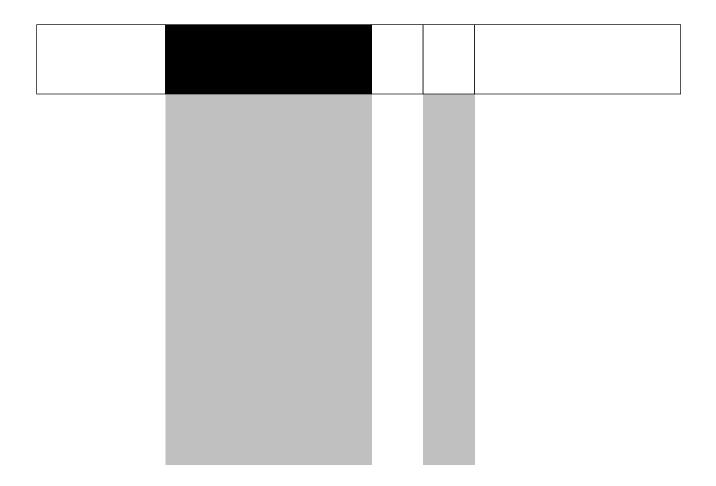
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Section 1 - Programmatic Compliance - Title IV, Part A: Student Support and Academic Enrichment Requirements

Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
	Upload(s	Assistanc	less)
)	е	
□ Building or district leadership teams or		this	
PD committee meeting agendas; meeting		indicator.	
minutes or presentations		□ We	
reviewing/evaluating Title IVA programs		would	
to inform future program activities		like to	
□ Data such as teacher surveys,		request	
classroom observations, and student		technical	
performance.		assistan	
		ce on	
		this	
		indicator	

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Other Programmatic Compliance Requirements



General Equitable Services Requirements

1. The LEA engaged in timely, meaningful and ongoing consultation with appropriate private school officials with the goal of reaching agreement about the use of funds and provided the equitable calculation of the private schools' allocation.

ESEA Section 1117(a)(1) and (b)(1,3)

ESEA Section 8501(a)(3)(A), (a)(4)(C), and (c)(1)

Section 2 - Equitable Services Compliance - General Equitable Services Requirements

Section 3 - Fiscal Compliance - General Fiscal Requirements

			LEA Comments (Optional - 50 words or
	Upload(s	Assistanc	less)
)	е	
		would	
		like to	
		request	
		technical	
		assistan	
		ce on	
		this	
		indicator.	

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Title I, Part A Fiscal Requirements

1. The LEA uses the same measure of poverty to identify Title I eligible schools (ex. FRPL); to determine the ranking of each school; and to determine school allocations based on the total number of children from low-income families in each school.

ESEA Section 1113(c)

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
1.	☐ Data or reports on low-income status		□ We	
	of each building, such as those provided		do not	
	for child nutrition (FRPL) or direct		have	
	certification data for CEP programs.		sufficient	
			evidence	
			to meet	
			this	
			indicator.	
			□ We	
			would	
			like to	
			request	
			technical	
			assistan	
			ce on	
			this	
			indicator.	

2. An LEA with a Title I allocation greater than \$500,000 has reserved and is expending not less than one percent of its Title I allocation for parent and family engagement activities, which may include family literacy.

ESEA Section 1116(a)(3)

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
2.	□ Expenditure/ encumbrance reports		□ We	
	from LEA accounting system AND		do not	
	□ Receipts OR		have	
	□ Invoices OR		sufficient	
	□ Purchase orders		evidence	
			to meet	
			this	
			indicator.	
			□ We	

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Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
	Upload(s	Assistanc	less)
)	е	
		would	
		like to	
		request	
		technical	
		assistan	
		ce on	
		this	
		indicator.	

3. Actual expenditures for Title IA match those that were allowable, budgeted and approved within the Consolidated Application for ESSA-Funded Programs.

ESEA Section 8306(a)(1)

===:	, 		1	
	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
3.	☐ Expenditure reports from LEA		□ We	
	accounting system AND		do not	
	☐ Invoices OR		have	
	□ Purchase orders OR		sufficient	
	□ Payroll records		evidence	
			to meet	
			this	
			indicator.	
			□ We	
			would	
			like to	
			request	
			technical	
			assistan	
			ce on	
			this	
			indicator.	

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Title I, Part D Fiscal Requirements

1. Actual expenditures for Title ID match those that were allowable, budgeted and approved within the Consolidated Application for ESSA-Funded Programs.

ESEA Section 8306(a)(1)

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
1.	☐ Expenditure reports from LEA		□ We	
	accounting system AND		do not	
	☐ Invoices OR		have	
	□ Purchase orders OR		sufficient	
	□ Payroll records		evidence	
			to meet	
			this	
			indicator.	
			□ We	
			would	
			like to	
			request	
			technical	
			assistan	
			ce on	
			this	
			:	

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Title II, Part A Fiscal Requirements

1. The LEA has demonstrated that Title IIA funds supplement, and do not supplant, non-Federal funds that would otherwise be used for activities authorized under this title.

ESEA Section 2301

LOLA OCCUON 2001				
	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
1.	□ Documentation, which may include			
	payroll records, invoices, or purchase			
	orders, that demonstrate the funded			
	activity was not previously funded out of			
		I		

Section 3 - Fiscal Compliance - Title II, Part A Fiscal Requirements

_				
	Recommended Evidence			LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
			like to	
			request	
			technical	
			assistan	
			ce on	
			this	
			indicator.	

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Title IV, Part A Fiscal Requirements

1. The LEA has demonstrated that Title IVA funds supplement, and do not supplant, non-Federal funds that would otherwise be used for activities authorized under this title.

ESEA Section 4110

ESEA Section 4110						
	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or		
		Upload(s	Assistanc	less)		
)	е			
1.	□ Documentation, which may include		□ We			
	payroll records, invoices, or purchase		do not			
	orders, that demonstrate the funded		have			
	activity was not previously funded out of		sufficient			
	state or local funds.		evidence			
	☐ To overcome a presumption of		to meet			
	supplanting, provide evidence the LEA		this			
	does not have funds to implement state		indicator.			
	or local mandated activities being funded		□ We			
	out of federal dollars.		would			
	□ LEA may note any new initiatives		like to			
	being funded by Title IVA.		request			
			technical			
			assistan			
			ce on			
			this			
			indicator.			

2. Actual expenditures for Title IVA match those that were allowable, budgeted and approved within the Consolidated Application for ESSA-Funded Programs.

ESEA Section 8306(a)(1)

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
2.	□ Expenditure reports from LEA		□ We	
	accounting system AND		do not	
	□ Invoices OR		have	
	□ Purchase orders OR		sufficient	
	□ Payroll records		evidence	
	☐ The LEA must clearly label items by		to meet	
	Title IV content area (WRE, SHS, or EUT)		this	
	to show alignment to the budget.		indicator.	
			□ We	
			would	

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Section 3 - Fiscal Compliance - Title IV, Part A Fiscal Requirements

Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
	Upload(s	Assistanc	less)
)	е	
		like to	
		request	
		technical	
		assistan	
		ce on	
		this	
		indicator.	

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Other Program Fiscal Requirements (as applicable)

1.

Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Assistanc	
)	е	
		to meet	
		this	
		indicator.	
		□ We	
		would	
		like to	
		request	
		technical	
		assistan	
		ce on	
		this	
		indicator.	

3. If the LEA accepted ARP HCY I funds as part of a consortium, please provide the share amount, as well as evidence that actual expenditures match those allowable, budgeted and approved activities, services, supplies, materials and equipment.

McKinney-Vento: § 722(e)(1) and § 723

Uniform Guidance: Subpart D (Post Federal Award Requirements), Subpart E (Cost Principles), and Subpart F

(Audit Requirements) EDGAR: 34. C.F.R. Part 76

ESEA: § 1124; § 1124A; § 1125; § 1126

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
		Upload(s	Assistanc	less)
)	е	
3.	□ Documentation of share amount		□ We	
	agreed upon by the consortium.		do not	
	□ Documentation of services provided		have	
	by the Consortium Lead, if applicable.		sufficient	
	□ Dated Expenditure reports AND		evidence	
	□ Invoices OR		to meet	
	□ Purchase orders OR		this	
	□ Payroll records		indicator.	
	☐ If services are provided by the		□ We	
	Consortium LEAD, please provide		would	
	evidence of services provided.		like to	
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Recommended Evidence		Technical Assistanc	LEA Comments (Optional - 50 words or less)
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4. If the LEA accepted American Rescue Plan (ARP) Homeless Children and Youth Part II (HCY II) funds as part of a consentiums), asuapmentables previous provide the strategy measure passive that accepted the consentation of the second period of the strategy of the second period period of the second period period of the second period peri

EDGAR: 34. C.F.R. Part 76

ESEA: § 1124; § 1124A; § 1125; § 1126

	Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
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4.	☐ Documentation of share amount		□ We	
	agreed upon by the consortium.		do not	
	□ Documentation of services provided		have	
	by the Consortium Lead, if applicable.		sufficient	
	□ Dated Expenditure reports AND		evidence	
	□ Invoices OR		to meet	
	□ Purchase orders OR		this	
	□ Payroll records		indicator.	
	☐ If services are provided by the		□ We	
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Section 3 - Fiscal Compliance - Other Program Fiscal Requirements

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Recommended Evidence	Evidence	Technical	LEA Comments (Optional - 50 words or
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