

**Colorado Department of Education
U.S. Department of Education Title I Monitoring Visit**

Summary of USDE Title I, Part A Findings and Recommendations

Title I, Part A: Accountability			
Indicator Number	Critical element	Timeline	CDE Response
<p>Indicator 1.3</p> <p>Recommendations</p>	<p>The SEA has approved assessments and alternate assessments in required subject areas and grades or an approved timeline to create them.</p> <p><u>Recommendation:</u> The student demographic information area of the Colorado Student Assessment Program (CSAP) test booklets is designed to allow only one of several accommodations that a student taking the State assessment might receive to be recorded. This item on the test booklet should be redesigned so that all testing accommodations received by a student can be properly recorded and reported as needed for various Federal and State reports.</p>	<p>February, 2005 through February, 2006</p> <p>The redesign of the CSAP test booklets will be completed prior to the next test administration scheduled to begin in February, 2006</p>	<p>The CSAP test booklet will be re-designed to allow for all testing accommodations to be recorded.</p> <p>CDE's Student Assessment Unit discussed this at its last CTB contract meeting as well as at its last Technical Advisory Committee meeting. During the meetings, a number of possibilities were considered that would allow accommodation data to more accurately reflect the assessment accommodations being made.</p> <p>Some possibilities discussed include:</p> <ul style="list-style-type: none"> • A scan sheet separate from the standard Student Biographical data grid that can have up to # of accommodations. (reading the tests + transcribing word processed answers + extra time) • Having the current accommodation bubbles scanned so several accommodations can be accounted for; plus, have a bubble noting non-standard accommodations so the IEP could be the detailed reference document. <p>CDE must operate within the framework its current contract. When the contract is renegotiated, CDE anticipates seeking other solutions. For example, online recording of multiple accommodations or other options.</p>

<p>Indicator 1.5</p> <p>Finding</p>	<p>The SEA has implemented all required components as identified in its accountability workbook.</p> <p><u>Further action required:</u> The CDE must amend its policy and practice of excluding ELLs student assessment results from NCLB school, district and State accountability determinations. In addition, CDE must discontinue its practice of counting students as participating in its standards based assessment system for NCLB accountability purposes if a student has not actually attempted to take one of the CSAP assessments. A student may not be counted as participating on CSAP assessments for NCLB accountability purposes simply because an answer sheet exists for the student, even if a teacher or another person has marked the student’s answer sheet “deferred due to language.”</p>	<p>April, 2005 through August, 2006</p> <p>Communication, guidance, and training is beginning immediately. Implementation will begin with the next test administrations and AYP determinations.</p> <p>April, 2005</p> <p>Spring, 2006</p>	<p>CDE will no longer exclude the student assessment results of NEP and LEP ELL students who have not been enrolled in U.S. schools for three years or more in making school, district, and state AYP determinations.</p> <p>CDE will no longer count ELL students as participants for the purposes of making AYP determinations if they do not actually attempt to take the test. Participation in an annual English language assessment will not suffice for the purpose of inclusion as a participant in the accountability system. Having a test booklet, in and of itself, will not be sufficient for inclusion as a participant in the accountability system.</p> <p>Districts have been notified of changes to testing requirements for English Language Learners, under NCLB (see memos included as part of Response Evidence). The memos have been sent to district Superintendents, Assessment Coordinators, ELA Directors, Title I Directors, and BOCES Directors. For the 2005-2006 school year, schools will be required to test all ELLs in reading and math content assessments, as well as English language proficiency assessments, in order to be counted as participants for AYP. The scores will also be included in performance calculations.</p> <p>Administration of the new Colorado English Language Assessment (CELA), will allow CDE to more validly assess reading proficiency of ELL students who have been in the US for less than 3 years and are still NEP or LEP.</p> <p>For the math CSAP, the state is exploring the possibility of oral translations of the test questions (an existing allowable accommodation) or translations of the oral scripts. These adjustments will hopefully make the assessment more valid for NEP and LEP ELL students.</p>
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Indicator 1.5

Finding

Further action required: CDE must provide a plan and a monitoring strategy to ensure that AYP decisions are made and parents informed of those decisions prior to the beginning of the next school year.

April, 2005 through
September, 2005

schools for three years or more.

Based on CDE's AYP determination schedule for the last two years and its ability to decrease the time necessary to make the AYP determinations during that time, CDE believes it will make and communicate AYP determinations by August 11, 2005.

During CDE's recent Regional Federal Programs Workshops, school districts have been notified that, prior to the beginning of the school year, they must offer school choice to parents of any child enrolled in a school that is on School Improvement or may be placed on School Improvement for the 2005-2006 school year. Schools that may exit School Improvement for the 2005-2006 year are including in their correspondence the caveat that the offer of choice is contingent upon their School Improvement status. In addition, a letter will be sent to all school districts reiterating this requirement. Finally, CDE will collect a signed copy of school choice letters from all school districts and schools for whom this requirement applies. In order to make it work, most school districts are offering school choice during the winter and spring of 2005 for the 2005-2006 school year.

School districts that fail to send out the required communications to parents will notified that CDE will be unable to release additional Title I funding until such time as parents have been appropriately notified of their choice options.

Please see the revised AYP timeline (included as part of the Response Evidence – filename 2004-2005 timelinefinal) that outlines how AYP determinations will be made before the start of the school year.

Indicator Number	Critical element	Timeline	CDE Response
<p>Indicator 1.7</p> <p>Finding</p>	<p>The SEA has ensured that LEAs have published annual report cards as required.</p> <p><u>Further action required:</u> CO must either provide aggregate and disaggregated comparative information on student achievement by subgroup at the school level compared with the district and State on school report cards or provide guidance and technical assistance to districts to enable them to generate and report this information at school level.</p>	<p>April, 2005</p> <p>January, 2005 – ongoing</p> <p>December, 2004 – ongoing</p>	<p>A memo has been sent to Title I Directors, Superintendents, and Assessment Directors requesting that they submit LEA Report Cards to CDE for review and technical assistance. (See memo “districtreports” included as part of the Response Evidence).</p> <p>CDE will review each submitted report and provide feedback to school districts relative to the requirements. CDe will work with school districts to build their capacity to produce report cards that meet the NCLB requirements.</p> <p>CDE will continue to work with school districts to ensure that they understand the required elements of the local report card. CDE will also continue to work with Colorado’s school district public relations officers to develop templates and reporting procedures to effectively communicate the information to parents and other community members.</p> <p>CDE will also continue to develop its NCLB School District Profile website so that it includes – for all school districts - all of the data elements that are required for inclusion in the local report cards.</p> <p>Districts have been given guidance and technical assistance with required elements of the LEA report card. Evidence was provided during the monitoring visit. (See “FW COSPRA Statewide Chapter Meeting” and the October Buzz article at: http://www.cde.state.co.us/cdeunified/download/Buzz1004.pdf).</p> <p>CDE is working with CTB/McGraw-Hill to get CSAP results in the format needed to be able to more readily post on CDE’s website to fulfill the reporting requirements for school level data.</p>

Indicator Number	Critical Element	Timeline	CDE Response
<p>Indicator 1.8</p> <p>Recommendation</p>	<p>The SEA indicates how funds received under Grants for State Assessments and related activities (§6111) will be or have been used to meet the 2005-06 and 2007-08 assessment requirements of NCLB.</p> <p><u>Recommendation:</u> Appropriate assessment for ELL is an area of challenge for the CDE. Yet section 6111 funds, according to data provided by the CDE, are not being directed towards the development of appropriate assessments and/or linguistically appropriate accommodations to address the needs of ELL. The State appears to be substituting State funds for assessment staff with section 6111 funds. Assessment personnel funded with section 6111 funds appear to be supporting the administration of the existing assessment program, which should be funded by State funds. A greater emphasis on use of section 6111 funds to support assessment development in priority areas such as appropriate CSAP accommodations for ELLs and to validate the consortium ELL assessment is recommended.</p>	<p>Ongoing</p>	<p>The Colorado English Language Assessment will be administered beginning in spring, 2005. The Colorado Student Assessment Program assesses the reading, writing, and math of all students in grades 3 through 10. Beginning in 2006, science proficiency will be assessed in grades 5, 8, and 10. Additionally, CDE Student Assessment staff - together with other Department staff, representatives of CTB/McGraw-Hill, and representatives of school districts - are considering a variety of options with regard to the use of linguistically appropriate accommodations.</p> <p>CDE's Student Assessment Unit has been an integral part of the Department's ability to meet the assessment- and data-intensive requirements of NCLB.</p> <p>The Department, State Board, and state legislature will continue to work together to ensure that section 6111 funds are spent in a manner that fulfills the requirements of NCLB and best meets the needs of the students of Colorado.</p>

Indicator Number	Critical element	Timeline	CDE Response
<p>Indicator 1.9</p> <p>Finding</p>	<p>The SEA ensures that LEAs meet all requirements for identifying and assessing the academic achievement of limited English proficient students.</p> <p><u>Further action required:</u> CDE must provide guidance and technical assistance to districts to enforce the requirement that ELLs be administered an annual assessment of English language proficiency until such time as a student achieves a score of proficiency on the test, irrespective of whether the English learner child is receiving Title III program services. In addition, CDE must monitor district compliance with this requirement annually.</p>	<p>April, 2005 through fall, 2005</p>	<p>A memo has been sent to all Superintendents, District Assessment Coordinators, ELA Directors, and Title I Directors that the English language proficiency of all ELL students must be assessed annually regardless of whether the child is receiving additional English language acquisition services. Additional guidance and training opportunities will be offered over the next several months.</p> <p>CDE is now collecting information about ELL students who receive services and those whose parents declined services through the Consolidated Application. We are also collecting data on how many of those students are being assessed with an English language proficiency assessment. Guidance has been provided in the instructions for the Consolidated Application as well, concerning the assessment of all ELL. (See attached memo to districts regarding English language proficiency assessment and consolidated application tables “consapp_datatbl0506”, Table 3.2, and “consappinstruct2005” pg. 24).</p>

Title I, Part A: Instructional Support

Element Number	Description	Timeline	CDE Response
<p>Indicator 2.1</p> <p>Finding</p>	<p>The SEA designs and implements procedures that ensure the hiring and retention of qualified paraprofessionals and ensure that parents are informed of educator credentials as required.</p> <p><u>Further action required:</u> ED requests an update on the status of the qualifications of Title I paraprofessionals in the State.</p> <p><u>Further action required:</u> CDE must provide ED with documentation of the status of paraprofessionals in JCPS as well as a description of the system that the district has in place to ensure that principals are not able to hire paraprofessionals who are not qualified for Title I funded positions.</p> <p><u>Further action required:</u> CDE must ensure that JCPS, and all LEAs, understand and comply with the requirement to notify parents of students in Title I schools, at the beginning of the school year, that they have the right to request information about the qualifications of their child's teachers and paraprofessionals as required. CDE must provide ED with evidence that JCPS has complied with this provision for the 2004-2005 school year.</p> <p><u>Further action required:</u> Staffs at CDE are aware of their misunderstanding and will issue correct guidance to LEAs immediately. CDE must provide documentation to ED that LEAs have received updated and corrected guidance. Further, CDE must provide evidence from one district, where applicable, that such a letter was sent to parents.</p>	<p>April, 2005</p>	<p>Please see the attached file among the Response Evidence that provides an update of the status of paraprofessionals in Colorado as well as in Jefferson County.</p> <p>Also attached is documentation in the form of a communication from the JCPS district office to all Title I principals outlining the system in place to ensure that only individuals who meet the minimum requirements for paraprofessionals will be hired for work in Title I targeted assistance or schoolwide positions.</p>

Element Number	Description	Timeline	CDE Response
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<p>Indicator 2.3</p> <p>Finding Recommendation</p>	<p>The SEA ensures that the LEAs and schools meet parental involvement requirements.</p> <p><u>Further action required:</u> CDE must submit to ED a copy of the updated parental involvement policy and school-parent compact from Molholm, O’Connell, and Wheat Ridge schools in JCPS along with an assurance from each school that the policies and compacts have been distributed to parents. Also, CDE must provide ED with a copy of the updated parental involvement policies from Fairmont, Harrington, Kepner, and Skinner schools in DPS along with an assurance from each school that the policies have been distributed to parents.</p> <p><u>Recommendation:</u> Based on the parent meetings conducted by ED, parents are not clear about the meaning of AYP, the options for public school choice, or supplemental educational services (SES). ED recommends that CDE annually communicate to LEAs that schools receiving Title I funds should conduct an annual meeting for parents that includes information about the Title I program in each school, even if the school is a charter school or operates a schoolwide program. ED also recommends that the CDE provide technical assistance to LEAs and schools in evaluating the effectiveness of parental involvement activities. The technical assistance should also include information on how to create parental involvement activities that will help parents better understand the educational system, the choices they have, and how to take advantage of the opportunities available to them.</p>	<p>Trish</p>	<p>CDE is submitting the requested documentation: school-level parent involvement policies (including compacts) from Molholm, O’Connell, and Wheat Ridge schools in JCPS, and Fairmont, Harrington, Kepner, and Skinner schools in DPS, along with an assurance from each school that the policies have been distributed to parents. The CDE is aware that some of these policies do not meet all the requirements outlined in section 1118 and will provide technical assistance to ensure that schools within these districts develop revisions with parents that meet the requirements. The State can provide appropriately revised policies and compacts to the USDE, should this be requested as a follow up in the fall.</p> <p>CDE is providing technical assistance to LEAs and schools in evaluating the effectiveness of parental involvement activities through the <i>NCLB Parent Involvement Policy Compliance and Evaluation</i> document (see attached; or http://www.cde.state.co.us/cdeunified/download/pi_compAndEvalGd.pdf). In addition, LEAs must submit data regarding the effectiveness of parental involvement activities in their 05-06 consolidated application. The Strengthening Parent Involvement: A Toolkit (http://www.cde.state.co.us/cdeunified/download/pi_toolkit.pdf), developed and disseminated to districts, schools, and parent groups in 2004, continues to be available to use. Finally, the CDE is partnering with Colorado Parent Information & Resource Center to develop an NCLB parent guidebook, which explains Colorado’s plan and how this impacts parents and schools.</p> <p>To ensure that schools have adopted school-level parent involvement policies that meet the minimum requirements, the state will use its developed monitoring document and protocol, and provide additional technical assistance to districts.</p>
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Element Number	Description	Timeline	CDE Response
<p>Indicator 2.4</p> <p>Finding Recommendation</p>	<p>The SEA ensures that schools and LEAs identified for improvement, corrective action, or restructuring have met the requirements of being so identified.</p> <p><u>Further action required:</u> ED requests that CDE remind LEAs that the school improvement plans must include the components outlined in the NCLB legislation and send ED evidence of that guidance. In addition, ED requests a copy of the revised school improvement plan from JCPS along with an assurance that the plan was developed in consultation with the larger school community per Section 1116(b)(3).</p> <p><u>Recommendation:</u> CDE needs to consider how to ensure that LEAs meet their statutory obligations pursuant to their schools' identification for improvement in a timely manner. Staff in the Aurora, Colorado Springs and Jefferson County Public School Districts do not believe they have adequate data to notify parents of their options for public school choice before the beginning of the school year. Staff in these districts expressed concern about the quality of the data they have received before the beginning of the school year citing past examples of data errors from CDE that resulted in incorrectly identifying schools. As a result, they have waited for final determinations from CDE in October before sending notification letters to parents of their options for public school choice.</p>	<p>Brad</p>	<p>CDE will continue to remind LEAs that the school improvement plans must include the components outlined in the NCLB legislation.</p> <p>Guidance can be found at the following location.</p> <p>http://www.cde.state.co.us/cdeunified/schimp_yr1_sip.htm</p> <p>A template for the School improvement plan is in the evidence folder.</p> <p>Note: This guidance has been available to all districts and was updated September of 2004 and will be updated again in the summer of 2005.</p> <p>ED requested a copy of the revised school improvement plan from JCPS along with an assurance that the plan was developed in consultation with the larger school community per Section 1116(b)(3).</p> <p>See the "Documentation Necessary from JCPS" in the Response Evidence folder.</p> <p>Data provided to districts on September 3, 2004, was accurate and verified. There was no need for districts to wait until October, unless they were processing a school appeal. CDE acknowledges that the data released the prior year (2003) was not final on the first release. However, 2004 data was final upon first release. This year districts will receive AYP data by August 15th and will be required to send letters immediately. Letters will be collected from CDE to monitor compliance.</p> <p>CDE will ensure that LEAs meet their statutory obligations pursuant to their schools' identification for improvement in a timely manner.</p>

Element Number	Description	Timeline	CDE Response
<p>Indicator 2.5</p> <p>Finding</p>	<p>The SEA ensures that requirements for public school choice are met.</p> <p><u>Further action required:</u> CDE must submit to ED evidence that parents of students eligible for public school choice in JCPS have been notified of their school choice options. ED requests a copy of each of the three letters sent to parents with children attending those schools.</p> <p><u>Further action required:</u> CDE must provide LEAs with additional guidance on the requirements of the notices to parents of children attending schools identified for improvement. CDE must provide a copy of that guidance to ED. In addition, CDE must ensure that the letters sent to parents from the three schools offering public school choice in JCPS include the required components. Copies of the letters sent to parents by each school must be provided to ED.</p>	<p>Laura/Trish</p>	<p>CDE is providing the necessary evidence that parents of students eligible for public school choice in JCPS have been notified of their school choice options through submission to ED of copies of each of the three letters sent to parents with children attending Molholm, O'Connell, and Wheatridge schools.</p> <p>CDE assures that letters that meet the requirements will be sent out before the first day of school year 05-06, should the schools remain on improvement.</p>
<p>Indicator 2.6</p> <p>Finding</p>	<p>The SEA ensures that requirements of the provision of supplemental educational services (SES) are met.</p> <p><u>Further action required:</u> CDE must develop an evaluation process and monitoring plan for use in evaluating the effectiveness of SES delivery for improving the academic achievement of students receiving those services. CDE must provide to ED a plan and timeline for addressing these concerns and provide documentation that the monitoring system is in place.</p>	<p>Laura</p>	

Element Number	Description	Timeline	CDE Response
<p>Indicator 2.7</p> <p>Finding</p>	<p>The SEA ensures that LEAs and schools develop schoolwide programs that use the flexibility provided to them by law to improve the academic achievement of all students in the school.</p> <p><u>Further action required:</u> CDE must provide to ED a plan outlining the steps it will take to ensure that all schoolwide programs have plans that address each of the ten required components, either as a separate plan or as part of an integrated plan which may incorporate additional requirements of the district, CDE, and school improvement plans as applicable. In addition, CDE must submit to ED revised plans that address the ten required components from one school in DPS and one school in JCPS.</p>	<p>Stan/Trish</p>	<p>The CDE will have an updated set of materials by June 30, 2005, that have been a year in development by a schoolwide workgroup. These materials will help to ensure that all schoolwide programs have plans that address each of the ten required components. In addition, the State will provide additional technical assistance to districts with schoolwide programs in the fall through regional workshops, as well as additional oversight through the Federal Programs Monitoring process.</p> <p>Schoolwide plans from DPS and JCPS are included in this packet.</p>

Title I, Part A: Fiduciary			
Indicator Number	Critical element	Timeline	CDE Response
<p>Indicator 3.2</p> <p>Finding Recommendation</p>	<p>The SEA complies with the allocation, reallocation, and carryover provisions of Title I.</p> <p><u>Further action required:</u> The CDE must provide to ED a copy of the final reallocation policy on which the State's Title I reallocations were based. (Note that Title I allocations that would have been distributed to LEAs that choose to opt out of Title I programs must also be included in the Title I reallocation policy.)</p> <p><u>Recommendation.</u> The CDE should reduce the amount of time it takes between when a district submits its initial consolidated LEA application and the time a district receives its Title I allocation. Many LEAs in the State do not receive their Title I funds until six to seven months after they receive their preliminary allocation notification. Section 9305(a) of the ESEA authorizes LEAs to receive</p>	<p>Pat</p>	

Indicator Number	Critical element	Timeline	CDE Response
Indicator 3.2 (continued)	funding from CDE under more that one covered program through consolidated local plans or applications. Section 9305I and (d) requires the SEA, in consultation with the Governor, to collaborate with LEAs in establishing procedures for submission of these plans or applications, and to require “only descriptions, information, assurances, and other material that are absolutely necessary for the consideration of the LEA plan or application.” As CDE reviews its process the State may want to consider the information required of LEAs, the time frame for sign-offs by all program and budget officials at the State level, and payment procedures.	Pat	
Indicator 3.4 Finding Recommendation	The SEA ensures that LEAs comply with the comparability provisions of Title I. <u>Further action required:</u> The CDE must provide to ED a plan that shows how it will ensure that all of its LEAs comply with the comparability requirements at least once every two years. The CDE must develop procedures for ensuring that its LEAs perform the necessary annual calculations to determine that services provided with State and local funds in Title I schools are comparable to non-Title I schools. The CDE must also ensure that actual LEA comparability reports are monitored on a regular basis (at least every two years) to determine whether comparability requirements are met.	Laura	
Indicator 3.7 Finding	The SEA has an accounting system for administrative funds that includes (1) State administration, (2) reallocation, and (3) reservation of funds for school improvement. <u>Further action required:</u> The CDE must ensure through its monitoring procedures that LEAs correctly reserve the amounts required by the Title I statute and regulations before allocating funds to their school attendance areas and schools.	Trish	CDE is submitting its Consolidated Federal Program Monitoring document as evidence of procedures to ensure that LEAs correctly reserve the amounts required by the Title I statute and regulations. This monitoring involves desk audits (through the consolidated application process), telephone audits, and on-site visits. The instructions for the completion of the consolidated application provide LEAs with a worksheet for reservation of funds. Title I program consultants will ensure, through the consolidated application process, that the correct reservation of funds occur.

Indicator Number	Critical element	Timeline	CDE Response
<p>Indicator 3.8</p> <p>Finding</p>	<p>The SEA has a system for ensuring fair and prompt resolution of complaints.</p> <p><u>Further action required:</u> The CDE must develop and have approved through its regular approval and adoption process a set of written procedures for the receipt and resolution of complaints, and provide ED with these procedures.</p>	<p>Pat</p>	<p>CDE has developed a complaint procedure that is currently under review by the State Committee of Practitioners. Once this committee has provided input, the procedure will be posted on the CDE website and disseminated to all LEA federal program representatives.</p>
<p>Indicator 3.10</p> <p>Finding</p>	<p>The SEA conducts monitoring of its subgrantees sufficient to ensure compliance with Title I program requirements.</p> <p><u>Further action required:</u> The CDE must provide a plan to ED that indicates how it will (1) implement a monitoring process that determines whether LEAs are complying with basic Title I fiscal requirements on an annual basis prior to the time it awards Title I funds and (2) carry out comprehensive monitoring to ensure that all school districts implement programmatic requirements, as required. The plan should address how the SEA will utilize data from the single audit process in its monitoring process and follow up on corrective actions for findings identified in the single audit process.</p>	<p>CAT Team (Brad)</p>	<p>CDE currently monitors compliance of school districts and whether they are complying with basic Title I fiscal requirements on an annual basis prior to the time it awards Title I funds through:</p> <ol style="list-style-type: none"> 1. the Consolidated Application 2. Desk audits 3. Budget audits 4. On-going communication with the districts <p>AYP processes are currently being monitored, as are district reporting requirements, through the desk audit process.</p> <p>A draft of a monitoring tool has been developed by CDE and has been disseminated to school districts during our spring regional workshops regarding the consolidated application.</p> <p>A copy of the tool is available in the evidence folder.</p> <p>The tool can be used by districts to “self-monitor” their compliance with the implementation of programmatic requirements as well as by CDE as “on-site” single audit process in its monitoring process and follow up on corrective actions for findings identified in the single audit process.</p>

Title I, Part B, Subpart 3: Accountability

Indicator Number	Critical Element	Timeline	CDE Response
<p>Indicator 1.1</p> <p>Finding</p>	<p>The SEA complies with the subgrant award requirements.</p> <p><u>Further action required:</u> The SEA must use the Title I, Part A committee of practitioners or a subgroup of that committee for the purposes of the Even Start program. Additional members may be added to the committee of practitioners subgroup for the purposes of the Even Start program to ensure that the committee has the needed expertise, but at least some members of the committee used for Even Start purposes must be members of the Title I, Part A committee.</p>	<p align="center">Frank</p>	
<p>Indicator 1.2</p> <p>Finding</p>	<p>The SEA requires applicants to submit applications for subgrants with the necessary documentation.</p> <p><u>Further action required:</u> These omitted requirements must be integrated into the SEA’s application and guidance.</p>	<p align="center">Frank</p>	
<p>Indicator 1.3</p> <p>Finding</p>	<p>In making non-competitive continuation awards, the SEA reviews the progress of each subgrantee in meeting the objectives of the program and evaluates the program based on the Indicators of Program Quality.</p> <p><u>Further action required:</u> The SEA must establish a clear definition of adequate progress for the purposes of implementing its state performance indicators and share these guidelines with local projects. Furthermore, the SEA should use the updated Indicators of Program Quality during monitoring in order to evaluate the progress of each project for the purposes of making continuation funding decisions, and discontinue local projects that fail to make sufficient progress as evaluated on those Indicators of Program Quality.</p>	<p align="center">Frank</p>	

Title I, Part B, Subpart 3: Instructional Support

Indicator Number	Critical Element	Person Responsible	CDE Response
<p>Indicator 2.2</p> <p>Finding</p>	<p>Each program assisted shall include the identification and recruitment of families most in need, and serve those families.</p> <p><u>Further action required:</u> Each local project must maintain documentation demonstrating that the families served by Even Start are eligible for the program. Although projects do not have to maintain original source documentation such as birth certificates for the children, they must document the ages of the children and educational level of the parent at the time the family entered the program. They must also document what criteria were used to determine that the family was low-income. In addition, local projects must establish criteria to determine which eligible families are among those “most in need” and be able to demonstrate that these are the families served by the program.</p>	<p align="center">Frank</p>	
<p>Indicator 2.5</p> <p>Finding</p>	<p>Each program shall be designed to accommodate the participants’ work schedule and other responsibilities, including the provision of support services, when those services are unavailable from other sources.</p> <p><u>Further action required:</u> The SEA must offer services designed to accommodate participants’ work schedules or refer participants to such services offered by other providers in the community. The SEA must also ensure that, if possible, projects offer support services such as transportation or childcare, if needed, to enable families to participate fully in Even Start services, when those services are unavailable from other sources.</p>	<p align="center">Frank</p>	

Title I, Part B, Subpart 3: Instructional Support

Indicator Number	Critical Element	Person Responsible	CDE Response
<p>Indicator 2.6</p> <p>Finding</p>	<p>Each program shall include high-quality, intensive instructional programs that promote adult literacy and empower parents to support the educational growth of their children, and in preparation of children for success in regular school programs.</p> <p><u>Further action required:</u> The CDE must develop, implement and monitor an action plan to increase intensity to meet section 1235(4). The CDE should work with projects to develop plans to provide the minimum contact hour recommendations of the Even Start program. (The program office recommends that projects offer at least 60 hours of adult education, 20 hours of parenting education and interactive literacy activities, combined, 65 hours of early childhood education for three to five year olds and 60 hours of early childhood education for infants and toddlers.) Because Colorado Even Start centers are fully licensed, this plan should include the possibility of adding instructional time for early childhood education when parents are unable to be present.</p>	<p align="center">Frank</p>	
<p>Indicator 2.14</p> <p>Finding</p>	<p>The local programs shall operate on a year-round basis, including the provisions of some program services, including instructional and enrichment services, during the summer months.</p> <p><u>Further action required:</u> The SEA must provide technical assistance and monitoring to ensure that local projects are aware of and follow the requirements that projects operate on a year-round basis. CDE must submit to ED an action plan for how it will ensure that Even Start projects are not closed for more than four consecutive weeks during the summer months.</p>	<p align="center">Frank</p>	

Title I, Part B, Subpart 3: Instructional Support

Indicator Number	Critical Element	Person Responsible	CDE Response
Indicator 2.16 Finding	The local programs shall use instructional programs based on scientifically based reading research for children and adults. <u>Further action required:</u> The CDE must provide technical assistance to the LEAs and monitor to ensure that instructional programs and practices are based on scientific research, including practices that promote language development and early reading skills in the early childhood education component. ED recommends that additional site visits and professional development be conducted to ensure that early childhood environments are print-rich.	Frank	
Indicator 2.18 Finding	The local programs shall use reading-readiness activities for preschool children based on scientifically based reading research. (see above action)	Frank	

Title I Part B, Subpart 3: SEA Fiduciary responsibilities

Indicator Number	Critical Element	Timeline	CDE Response
Indicator 3.4 Finding	The SEA ensures timely and meaningful consultation with private school officials on how to provide Even Start services and benefits to eligible elementary and secondary school students attending non-public schools and their teachers or other instructional personnel, and local programs provide an appropriate amount of those services and benefits through an eligible provider. <u>Further action required:</u> Even Start projects must consult with private school officials in order to provide Even Start services and benefits to eligible private school students and their teachers or other educational personnel on an equitable basis. The CDE should refer to the Even Start non-regulatory guidance for assistance.	Frank	

Monitoring Area 1, Title I, Part D: Accountability

Indicator Number	Critical Element	Timeline	CDE Response
<p align="center">Indicator 1.2</p> <p align="center">Finding</p>	<p>The SEA ensures that State agency (SA) plans for services to eligible N/D students meet all requirements.</p> <p><u>Further action required:</u> ED requires that the CDE inform State agencies that they must amend their application to the SEA for Part D funds in order to submit program goals and objectives and a description of how such goals and objectives align with the State plan. ED requires CDE to submit a report on how it will remedy this compliance issue within 30-days of receipt of this report.</p>	<p align="center">Brad</p>	<p>CDE will inform State agencies that they must amend their application to the SEA for Part D funds in order to submit program goals and objectives and a description of how such goals and objectives align with the State plan.</p> <p>CDE will amend our application for Part D funds to include program goals and objectives that align with the state plan.</p> <p>Goals and objectives will be based on the 2005 performance plan available on the ED website and will be developed in consultation with personnel at the facilities who will have the responsibility of collecting the data surrounding these goals and objectives.</p> <p>http://www.ed.gov/about/reports/annual/2005plan/edlite-esea-neglected.html</p>
<p align="center">Indicator 1.3</p> <p align="center">Recommendation</p>	<p>The SEA ensures that local educational agency (LEA) plans for services to eligible N/D students meet all requirements.</p> <p><u>Recommendation:</u> ED staff found that LEA staff interviewed were either unaware of their responsibilities or were not aware of activities to coordinate Part D programs with other services, such as social and health services and federal programs, such as vocational and technical programs as required by section 1423. ED recommends that CDE provide guidance and technical support to LEAs with Part D subgrants on coordination and collaboration of programs with other local and Federal services and programs.</p>	<p align="center">Brad</p>	<p>CDE will continue to provide guidance and technical support to LEAs with Part D subgrants on coordination and collaboration of programs with other local and Federal services and programs.</p> <p>CDE will ensure that LEA plan for services to eligible N/D student meet all requirements.</p>

<p>Indicator 3.2</p> <p>Finding Recommendation</p>	<p>The SEA conducts monitoring of its subgrantees sufficient to ensure compliance with Title I, Part D program requirements.</p> <p><u>Further action required:</u> ED requires that the CDE develop a process and schedule to conduct compliance monitoring of SAs and LEAs with Title I, Part D subgrants and to submit such plan to ED. CDE must also report to ED on its monitoring activities for the Title I, Part D program within 120 days of receipt of this report.</p> <p><u>Recommendation:</u> ED staff found that SEA and LEA programs were not required to submit annual reports to the SEA that would allow the SEA to review Title I, Part D program progress and determine the program’s impact on student outcomes. ED recommends that the CDE require annual progress reports from Title I, Part D grantees in order to assess program performance in improving the academic, vocational, and technical skills of students.</p>	<p>Brad</p>	<p>CDE will develop a process and schedule to conduct compliance monitoring of SAs and LEAs with Title I, Part D subgrants and to submit such plan to ED within 120 days of receipt of this report.</p> <p>A draft of a monitoring tool has been developed by CDE and has been disseminated to school districts during our spring regional workshops regarding the consolidated application. A portion of this tool is used to monitor compliance of SAs and LEAs with Title I, Part D subgrants.</p> <p>A copy of the tool is available in the evidence folder.</p> <p>The tool can be used by districts to “self-monitor” their compliance with the implementation of programmatic requirements as well as by CDE as “on-site” single audit process in its monitoring process and follow up on corrective actions for findings identified in the single audit process.</p>
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