



## DEPARTMENT OF EDUCATION


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DOE WEBSITE: <http://www.doe.k12.de.us>

Mark T. Murphy  
Secretary of Education  
Voice: (302) 735-4000  
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### MEMORANDUM

November 16, 2012

TO: Audrey Erschen, Head of School  
Providence Creek Academy

FROM: Mary Ann Mieczkowski   
Director, Exceptional Children Resources

RE: Special Education Compliance Monitoring 2012-2013  
Report and Instructions

As you know, the Department of Education ("DOE") conducts special education compliance monitoring of local education agencies ("LEAs") on a three year cycle. Your LEA was selected for monitoring in 2012-2013 for the third year of our cycle. The DOE has provided your LEA with a Monitoring Report summarizing the DOE's findings. This memo provides an overview of the local responsibilities for corrective action and summarizes information we have previously discussed at special education leadership meetings. A team from the Exceptional Children Resources Group will be in contact with your LEA shortly to discuss the findings and next steps.

#### **A. DOE's Monitoring Activities**

DOE monitors used a protocol to review student files in a total of 21 regulatory areas, including IEP development, LRE, secondary transition, and IEP meeting participants. The Monitoring Report describes any findings of noncompliance based on the protocol at both the LEA and student levels. The findings trigger different levels of required corrective action. If, for example, noncompliance is found at the individual student level, the LEA must correct the student records as soon as possible. Additional corrective actions may also be required, such as staff training, depending on the total percentage of noncompliance for a particular regulatory item. DOE representatives will work with your LEA to develop a corrective action plan, to include the timelines for correction of noncompliance and the specific strategies to be used. Your LEA will be responsible for reviewing the findings, and conducting a "root cause analysis" to identify the reasons the noncompliance is occurring.

**B. Student Level Corrective Action**

As mentioned, all noncompliance must be corrected at the individual student level, and is described in Section 3 of the Monitoring Report. Student IEPs must be corrected by the LEA as soon as possible, but no later than **February 1, 2013**.

Note, however, the correction of IEPs is not required if: (a) the student is no longer enrolled in the LEA; (b) the student was dismissed from receiving special education services; or (c) the student no longer attends school due to graduation or other reasons. The Monitoring Report contains a section for your LEA to report when these circumstances occur.

**C. LEA Level Corrective Action**

LEAs must implement additional corrective actions if the total noncompliance for a regulatory item is less than 95%. The percentage levels for your LEA are found in Section 4 of the Monitoring Report. Before starting any corrective actions, however, the LEA must conduct a "root cause" analysis to identify the specific reasons the problem exists within the LEA. Depending on the reasons identified, the LEA should then tailor specific action steps to remedy the problem. Corrective actions can include, but are not limited to, self-audits and LEA review of student records, review of compliance data by teacher/school, specific trainings for targeted staff, and review of policies and practices at the LEA and school levels. Your staff should discuss plans and technical assistance options with the DOE team assigned to your LEA. The DOE team will oversee the development of a corrective action plan with you, and review a timeline for submitting a plan to the DOE.

Note, the DOE is requiring each LEA to provide training to staff in the areas that noncompliance is identified below 95%. The training should be specifically developed by each LEA to ensure staff will be properly implementing the regulations. "Training" can include: (a) presentations to staff by an expert or consultant in special education regulations; (2) distribution of written materials to staff; and/or (3) use of technical assistance documents and professional development modules sanctioned and approved by the U.S. Department of Education.

We are asking LEAs to report to the DOE on the completion of their corrective actions by **April 15, 2013**.

**D. State Verification Activities**

As corrections are completed, the DOE will begin to review additional student records for compliance verification. The number of additional records reviewed will depend upon the percentage level of noncompliance at the LEA and other factors.

**E. Additional Notes About the DOE's Compliance Findings**

Item 26 on the DOE's file review protocol addresses whether IEPs contain a statement of measurable annual goals. Please note the DOE selected the second annual goal in each IEP to review for measurability and compliance with the regulation. If the second goal was a related

services goal, DOE monitors reviewed the next IEP goal. If noncompliance was found, the Monitoring Report identifies the specific goal(s) that must be corrected.

Item STR 10 on the DOE's file review protocol examines whether a career technical education teacher of the student, or a career technical teacher coordinator, attended the IEP meeting for students who are, or may be participating in a career and technical education program. However, no compliance findings were made for STR 10 related to Part B of the IDEA this year. The monitoring data from STR 10 will be shared with your LEA, and staff from the Exceptional Children Resources group will be providing technical assistance to LEAs to clarify this regulatory area.

***F. Summary***

In closing, we hope this memo is helpful to you. As always, we appreciate the cooperation, commitment, and courtesy displayed by your staff throughout the monitoring process. As your LEA works through its corrective action steps, please be sure to direct your questions and comments to the team working with your LEA. Thank you and we look forward to working with you throughout the year.

MAM:JK:lj

cc: Nicole Lewis, Special Education Services  
Marjorie Knorr-Hayden, Special Education Services  
Mark Murphy, Secretary of Education  
Exceptional Children Resources Work Group  
John Carwell, Charter School Office

### **Compliance Summary**

This section of the report provides a summary of the data collected during the IEP file review process.

All instances of noncompliance must be corrected at an individual student level.

For any item in which an LEA has noncompliance, additional files/data will be reviewed by DE DOE to verify that systemic changes have occurred and compliance is being met. Additional files/data that will be reviewed to ensure systemic compliance is not occurring. The additional files will not be the files that were reviewed during the first file review process.

### **Student Level Noncompliance**

When corrections have been made for all items of noncompliance for each student, the appropriate administrator must sign and date the form.

When all student corrections have been completed, notify DE DOE that the corrections have been completed.

Submit evidence as required to DE DOE for verification of corrections.

DE DOE will verify that all individual student noncompliance has been corrected and will also sign the form.

### **LEA Corrective Action**

For any LEA having less than 95% compliance total for any item on the Compliance Summary report, LEA Level Corrective Actions must also be completed for that item. This percentage is calculated by dividing the total number of students found compliant by the total number of student files reviewed. Additional Corrective Actions may also be identified in Section 4 - LEA Corrective Actions.

Using the LEA Action Log in Section 4, record the actions taken for each item of noncompliance.

After corrections have been made for each item of noncompliance, the appropriate administrator must sign and date the form for each item.

After ALL LEA level corrective actions have been completed for ALL areas of noncompliance, notify DE DOE that the actions have been completed.

Submit evidence as required to DE DOE for verification of corrections.

DE DOE will verify that all LEA level corrective actions have been completed and also sign the form.

### **Certification Page**

Upon correction of ALL student level and LEA level noncompliance, the LEA administrator responsible for ensuring that corrections have been made must sign and date the Certification Page form and submit it and all report pages to your LEA representatives.



**Providence Creek Academy**  
**2012-2013 LEA Compliance Monitoring Report**

*Delaware Department of Education*

**Date of Record Review:**  
October 24, 2012

**Date of Notification:**  
November 16, 2012

**All Corrections Due by:**  
April 15, 2013

**Prepared by:**  
Exceptional Children Resources

**ECR Contact: Michele Rush and Linda Smith**  
**Phone: (302) 735-4210**

Providence Creek Academy  
2012-2013 LEA Compliance Monitoring Report

Date of Notification: November 16, 2012

All Corrections Due By: April 15, 2013

Criteria for Corrective Actions:		
2012-2013 Criteria for Individual Student Corrective Actions:	Less than	100%
2012-2013 Criteria for LEA Level Corrective Actions:	Less than	95%

Summary of Individual Student IEP Reviews							
Question	Least Restrictive Environment/Placement					Percentage	Corrective Actions
	Legal Reference	N=	Yes	No	NA		
LRE 1: Placement Decision Made by IEP Team	14 DE Admin Code §923.16.0	10	10	0		100.00%	Criteria Met
LRE 3: Explanation Why Student Will Not Participate With Non-Disabled Peers in Regular Class	34 CFR §300.116 14 DE Admin Code §925.20 34 CFR §300.320	10	0	0	10	NA	NA
IEP Meeting Participation							
IEP 2: IEP Meeting Participants: Parents	14 DE Admin Code §925.22.0, §926.1.0						
IEP 3: IEP Meeting Participants: Regular Education Teacher	34 CFR §300.322 §300.501 14 DE Admin Code §925.21.0	10	10	0	0	100.00%	Criteria Met
IEP 4: IEP Meeting Participants: Special Education Teacher	34 CFR §300.321 14 DE Admin Code §925.21.0 34 CFR §300.321	10	10	0	0	100.00%	Criteria Met
	34 CFR §300.321	10	10	0		100.00%	Criteria Met
IEP Meeting Participation							
Question	Legal Reference	N=	Yes	No	NA	Percentage	Corrective Actions

IEP 5: IEP Meeting Participants: LEA Representative	14 DE Admin Code §925.21.0	10	10	0			100.00%	Criteria Met
<b>IEP Development</b>								
Question	Legal Reference	N=	Yes	No	NA	Percentage	Corrective Actions	
IEP 15: Special Factors: Behavior Needs	14 DE Admin Code §925.24.0							
IEP 16: IEP Addresses Behavior Needs	34 CFR §300.324 14 DE Admin Code §925.24.0	10	10	0	0	100.00%	Criteria Met	
IEP 21: Statement of Special Education Services, Related Services and Modifications/Supports Needed	34 CFR §300.324 14 DE Admin Code §925.20	10	0	0	10	NA	NA	
IEP 24: Statement of Present Levels of Performance	34 CFR §300.320 14 DE Admin Code §925.20	10	10	0		100.00%	Criteria Met	
IEP 25: Description of How Student Progress Measured	34 CFR §300.320 14 DE Admin Code §925.20	10	10	0		100.00%	Criteria Met	
<b>Current IEP</b>								
Question	Legal Reference	N=	Yes	No	NA	Percentage	Corrective Actions	
IEP 26: Statement of Measurable Annual Goal	14 DE Admin Code §925.20							
IEP 27: Extended School Year Services	34 CFR §300.320 14 DE Admin Code §923.6.0 §925.20	10	10	0		100.00%	Criteria Met	
	34 CFR §300.106	10	9	1		90.00%	Individual Student Corrections and LEA Corrective Actions Must Be Completed	

Secondary Transition Goals and Services							
Question	Legal Reference	N=	Yes	No	NA	Percentage	Corrective Actions
STR 1: Parent Consent to Invite and Invitation of Meeting to Participating Agency	14 DE Admin Code §925.21.0						
STR 2: Student Invited to IEP Meeting	34 CFR §300.321 14 DE Admin Code §925.21.0	10	0	0	10	NA	NA
STR 4: Age Appropriate Transition Assessments	34 CFR §300.321 14 DE Admin Code §925.20.0	10	1	0	9	100.00%	Criteria Met
STR 5: Measurable Postsecondary Goal Related to Employment After High School	34 CFR §300.320 14 DE Admin Code §925.20.0	10	1	0	9	100.00%	Criteria Met
STR 6: Measurable Postsecondary Goal Related to Education or Training After High School	34 CFR §300.320 14 DE Admin Code §925.20.0	10	1	0	9	100.00%	Criteria Met
STR 7: Measurable Postsecondary Goal Related to Independent Living After High School	34 CFR §300.320 14 DE Admin Code §925.20.0	10	1	0	9	100.00%	Criteria Met
STR 8: Courses of Study	34 CFR §300.320 14 DE Admin Code §925.20.0	10	1	0	9	100.00%	Criteria Met
STR 9: Transition Services and Activities	34 CFR §300.320 14 DE Admin Code §925.20.0	10	1	0	9	100.00%	Criteria Met

Percentage of Compliant Student Files for Indicator B13 Post Secondary Goals and Services*		NA
*LEA Compliance Status is calculated by dividing the number of students with ALL items compliant by the total number of student files reviewed for Indicator 13 compliance. (Target = 100%)		



**Providence Creek Academy**  
**2012-2013 Compliance Monitoring: Tracking the Correction of Student Level Citations**

**Date of Notification: November 16, 2012**

**All Corrections Due By: April 15, 2013**

**Directions for Correcting IDEA Individual Student Noncompliance Citations**

**Step 1:** DE DOE Compliance Monitor must first enter all individual student data on tab 3.1 - Individual Student Data, which will then populate this tab with data on those students with NC. Once tab 3.1 is complete a paper copy of this tab (as part of the entire report) will be provided to the LEA so that the correction of individual student noncompliance can be tracked and

**Step 2:** The LEA is required to correct all instances of noncompliance for each student where noncompliance was identified. LEA Validator must fill in the Corrective Action Code and the date of correction for each student prior to submitting this report to DE DOE. This page must be signed with the name and date of the LEA Validator.

**Corrective Action Code:**

- 0 = Correction not yet made
- 1 = Correction has been made as required for this student
- 2 = Student no longer enrolled in LEA
- 3 = Student no longer receives special education services
- 4 = Student no longer in school (graduation, dropout, deceased)

**Step 3:** LEA Validator must submit this completed form and other evidence (as required) to DE DOE Compliance Monitor.

**Step 4:** DE DOE Compliance Monitor must verify that the findings of noncompliance have been corrected as per the LEA report. DE DOE Compliance Monitor must include his/her name and date of verification when all noncompliance has been verified as corrected.

LEA Action Log

Verification of Correction			
Signature of LEA Validator	Date of Signature	Signature of DE DOE Validator	Date of Signature
<i>Audrey M. Lock</i>	01/4/13		

IEP Development						
Question from File Review	IEP 27: Extended School Year Services		Corrective Action	Reconvene IEP team to consider and determine need for ESY		
Student Demographic Information			LEA Verification of Correction		DE DOE Verification of Correction	
Student Date of Birth	First Name	Last Name	School	Signature of LEA Validator	Date of Correction	Date of Verification
[Redacted]	[Redacted]	[Redacted]	Providence Creek			



# 2012-2013 Compliance Monitoring: Tracking LEA Corrections to Address LEA Level Citations

Providence Creek Academy

Date of Notification: November 16, 2012

All Corrections Made By: April 15, 2013

## Least Restrictive Environment/Placement

2012-13 Criteria: 95%		Verification of Correction			Verification of Correction	
	LEA Total	Corrective Actions	LEA Signature	LEA Date	DE DOE Signature	DE DOE Date
LRE 1: Placement Decision Made by IEP Team	100.00%	Criteria Met	No signature required.	No date required.	No signature required.	No date required.
LRE 1: LEA Action Log: No Action Required.						
LRE 3: Explanation Why Student Will Not Participate With Non-Disabled Peers in Regular Class	NA	NA	No signature required.	No date required.	No signature required.	No date required.
LRE 3: LEA Action Log: No Action Required						



IEP Meeting Participation						
2012-13 Criteria: 95%	LEA Total	Corrective Actions	Verification of Correction		Verification of Correction	
			LEA Signature	LEA Date	DE DOE Signature	DE DOE Date
IEP 2: IEP Meeting Participants: Parents	100.00%	Criteria Met	No signature required.	No date required.	No signature required.	No date required.
IEP 2: LEA Action Log: No Action Required.						
IEP 3: IEP Meeting Participants: Regular Education Teacher	100.00%	Criteria Met	No signature required.	No date required.	No signature required.	No date required.
IEP 3: LEA Action Log: No Action Required.						
IEP 4: IEP Meeting Participants: Special Education Teacher	100.00%	Criteria Met	No signature required.	No date required.	No signature required.	No date required.
IEP 4: LEA Action Log: No Action Required.						



			Verification of Correction		Verification of Correction	
2012-13 Criteria: 95%	LEA Total	Corrective Actions	LEA Signature	LEA Date	DE DOE Signature	DE DOE Date
IEP 5: IEP Meeting Participants: LEA Representative	100.00%	Criteria Met	No signature required.	No date required.	No signature required.	No date required.
IEP 5: <u>LEA Action Log:</u> No Action Required.						
IEP Development						
IEP 15: Special Factors: Behavior Needs	100.00%	Criteria Met	No signature required.	No date required.	No signature required.	No date required.
IEP 15: <u>LEA Action Log:</u> No Action Required.						
IEP 16: IEP Addresses Behavior Needs	NA	NA	No signature required.	No date required.	No signature required.	No date required.
IEP 16: <u>LEA Action Log:</u> No Action Required						



		Verification of Correction		Verification of Correction	
2012-13 Criteria: 95%	LEA Total	Corrective Actions	LEA Signature	LEA Date	DE DOE Signature DE DOE Date
IEP 21: Statement of Special Education Services, Related Services and Modifications/Supports Needed	100.00%	Criteria Met	No signature required.	No date required.	No date required.
IEP 21: LEA Action Log: No Action Required.					
IEP 24: Statement of Present Levels of Performance	100.00%	Criteria Met	No signature required.	No date required.	No date required.
IEP 24: LEA Action Log: No Action Required.					



2012-13 Criteria: 95%		LEA Total		Corrective Actions	Verification of Correction		Verification of Correction	
					LEA Signature	LEA Date	DE DOE Signature	DE DOE Date
IEP 25: Description of How Student Progress Measured		100.00%		Criteria Met	No signature required.	No date required.	No signature required.	No date required.
<u>IEP 25: LEA Action Log:</u>		No Action Required.						
IEP 26: Statement of Measurable Annual Goal		100.00%		Criteria Met	No signature required.	No date required.	No signature required.	No date required.
<u>IEP 26: LEA Action Log:</u>		No Action Required.						
IEP 27: Extended School Year Services		90.00%		Provide training to appropriate staff and complete other actions required by the corrective action plan.				
<u>IEP 27: LEA Action Log:</u>		All Special Education staff was provided training during their monthly PLC on ESY services, on 1/16/13 Dudney M. Lusho 1/17/13						



Secondary Transition Goals and Services						
2012-13 Criteria: 95%	LEA Total	Corrective Actions	Verification of Correction			Verification of Correction
			LEA Signature	LEA Date	DE DOE Signature	DE DOE Date
STR 1: Parent Consent to Invite and Invitation of Meeting to Participating Agency	NA	NA	No signature required.	No date required.	No signature required.	No date required.
STR 1: LEA Action Log: No Action Required						
STR 2: Student Invited to IEP Meeting	100.00%	Criteria Met	No signature required.	No date required.	No signature required.	No date required.
STR 2: LEA Action Log: No Action Required.						
STR 4: Age Appropriate Transition Assessments	100.00%	Criteria Met	No signature required.	No date required.	No signature required.	No date required.
STR 4: LEA Action Log: No Action Required.						
			Verification of Correction			Verification of Correction



2012-13 Criteria: 95%	LEA Total	Corrective Actions	LEA Signature	LEA Date	DE DOE Signature	DE DOE Date
STR 5: Measurable Postsecondary Goal Related to Employment After High School	100.00%	Criteria Met	No signature required.	No date required.	No signature required.	No date required.
<b>STR 5: LEA Action Log:</b>						
STR 6: Measurable Postsecondary Goal Related to Education or Training After High School	100.00%	Criteria Met	No signature required.	No date required.	No signature required.	No date required.
<b>STR 6: LEA Action Log:</b>						
STR 7: Measurable Postsecondary Goal Related to Independent Living After High School	100.00%	Criteria Met	No signature required.	No date required.	No signature required.	No date required.
<b>STR 7: LEA Action Log:</b>						



		Verification of Correction		Verification of Correction	
2012-13 Criteria: 95%	LEA Total	Corrective Actions	LEA Signature	LEA Date	DE DOE Signature DE DOE Date
STR 8: Courses of Study	100.00%	Criteria Met	No signature required.	No date required.	No date required.
STR 8: LEA Action Log: No Action Required.					
STR 9: Transition Services and Activities	100.00%	Criteria Met	No signature required.	No date required.	No date required.
STR 9: LEA Action Log: No Action Required.					



**Certification of 2012-2013 Plan Completion**

**Providence Creek Academy**

**Notice of Certification:** The completion of this page by an LEA representative certifies that all data submitted are true, correct, complete and done in full compliance with all applicable state and federal rules and regulations to the best of his/her knowledge and belief.

All corrections due by: **April 15, 2013**

**All Individual Student Noncompliance has been Corrected**

Certified by:

LEA Representative Name: Audrey M. Erschen

LEA Representative Position: Head of School

LEA Representative Signature: Audrey M. Erschen

Date of Completion: 1/17/13

**All LEA Level Corrective Actions have been Completed**

Certified by:

LEA Representative Name: \_\_\_\_\_

LEA Representative Position: \_\_\_\_\_

LEA Representative Signature: \_\_\_\_\_

Date of Completion: \_\_\_\_\_



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FAX: (302) 739-4654

November 20, 2012

Michelle Candeliri  
Providence Creek  
PO Box 265, 273 W Duck Creek Rd  
Clayton, DE 19938

Dear Ms. Candeliri:

On October 24, 2012, staff from our Title I Office visited your LEA to check for compliance under Title I, Part A in the following areas:

- Parent Notifications
- Employee Certifications and Personnel Activity Reports
- Inventory Records
- Budget vs. Expenditures

Based on this visit, there were findings of non-compliance in the following areas:

- Parent Notifications
- Inventory Records

The attached checklists provide information on areas of compliance and required resolution steps on the areas of non-compliance for your LEA. The requested documentation to verify compliance will be due to the DDOE Program Manager by the date specified for each finding.

The DDOE would like to thank you and all the LEA and school staff for the hard work in preparing for the audit and assistance provided during the visit. Compliance monitoring is a necessary state responsibility and we appreciate your accommodations.

We look forward to working further with your staff to resolve the issues contained in this report to improve the quality of all programs in Delaware.

Sincerely,

A handwritten signature in cursive script, reading "Theresa Vandrzyk Kough".

Theresa Vandrzyk Kough  
Director, Career, Technical and Title I Resources

Enclosure

cc: Brian Curtis, DDOE  
John Huise, DDOE]  
Jim Hertzog, DDOE  
John Carwell, DDOE

# On-Site Compliance Audit Checklist

## Title I, Part A: Budget vs Expenditures

District/Charter: Providence Creek      Reviewer: John Hulse

Date: October 24, 2012

### Legislation/Regulation Authority:

OMB CIRCULAR A-133, Cross-Cutting Section Part III.B. A State may adopt its own written fiscal and administrative requirements, which are consistent with the provisions of OMB Circular A-87, for expending and accounting for all funds received by SEAs and LEAs under ESEA programs. The written fiscal and administrative requirements must: (a) be sufficiently specific to ensure that funds are used in compliance with all applicable statutory and regulatory provisions, including ensuring that costs are allocable to a particular cost objective; (b) ensure that funds received are spent only for reasonable and necessary costs of the program; and (c) ensure that funds are not used for general expenses required to carry out other responsibilities of State or local governments (34 CFR section 299.2(b)).

OMB CIRCULAR A-133, Subpart D Section .400(d)(3) Monitor the activities of subrecipients as necessary to ensure that Federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements and that performance goals are achieved.

### Intent of the Legislation/Regulation:

To certify that federal awards are used for authorized purposes.

### Focus of Review:

Ensure that proper documentation is on file for approved expenditures through Title I, Part A.

### Method of Assessment: (Check all that apply)

- ☒ Document Review
- ☐ Observation
- ☐ Interview

### Location of Audit: (Check all that apply)

- ☒ LEA Office..... ☐ Excludes Charters
- ☐ Elementary School..... ☐ Excludes Charters
- ☐ Middle School..... ☐ Excludes Charters
- ☐ High School..... ☐ Excludes Charters
- ☐ Other Agency

Over the past three years, what guidance, technical assistance, and/or professional development has been offered to the districts and charters regarding this regulation?

Technical assistance was provided via technical assistance sessions and newsletters.

Required District and Charter School Compliance of Title I, Part A – Budget vs Expenditures	Evidence	Compliance			Comments/Corrective Action	Corrective Action Due Date
		Yes	No	N/A		
Requested documentation for approved Title I expenditures in SY 2011-2012 is available. If not, and budgeted item(s) exceeds 15% or \$5,000 (whichever is greater), an approved grant amendment is on file to support the programmatic change.	Receipts, executed purchase orders, canceled checks or approved grant amendment (if budgeted item(s) exceeds 15% or \$5,000 (whichever is greater).	X				
Approved expenditures were made on timely basis to allow for full implementation during the 11-12 School Year.	Date services delivered	X				

**On-Site Compliance Audit Checklist**  
**Title I, Part A: Employee Certifications and Personnel Activity Reports**

**District/Charter:** Providence Creek

**Reviewer:** John Hulse

**Date:** October 24, 2012

**Legislation/Regulation Authority:**

OMB CIRCULAR A-87, Attachment B, Selected Items of Cost, outlines the documentation LEAs and principals are required keep on file for all employees compensated with Federal funds. The required documentation is dependent on the percentage of time an employee is expected to spend on a Federal award or cost objective.

**Intent of the Legislation/Regulation:**

To certify the following:

- Charges for salaries and wages of employees expected to work solely on a single Federal award or cost objective are supported by periodic certifications that the employee worked solely on that program for the period covered by the certification.
- Charges for salaries and wages of employees who are expected to work on multiple activities or cost objectives, are aligned with documented work according to the distribution of their salaries or wages through monthly personal activity reports.

**Focus of Review:**

Ensure that proper documentation is on file for all staff funded through Title I, Part A.

**Method of Assessment:** (Check all that apply)

- ☒ Document Review  
☐ Observation  
☐ Interview

**Location of Audit:** (Check all that apply)

- ☒ LEA Office..... ☐ Excludes Charters  
☐ Elementary School..... ☐ Excludes Charters  
☐ Middle School..... ☐ Excludes Charters  
☐ High School..... ☐ Excludes Charters  
☐ Other Agency

**Over the past three years, what guidance, technical assistance, and/or professional development has been offered to the districts and charters regarding this regulation?**

Technical assistance was provided via on-site monitoring, one-on-one phone calls and regional technical assistance sessions.

Required District and Charter School Compliance Items of Title I, Part A – Employee Certifications and Personnel Activity Reports	Evidence	Compliance			Comments/Corrective Action	Corrective Action Due Date
		Yes	No	N/A		
Employee Certifications are completed for all employees paid exclusively by Title I funds or employees who are paid partially with Title I funds but are working on a single cost objective	<ul style="list-style-type: none"> <li>Semi-annual reports containing the signature of the employee or supervisor having first-hand knowledge of the work performed are completed for each employee for the preceding fiscal year.</li> <li>The form includes an acknowledgement that the employee worked solely on the Federal program for the period covered by the certification.</li> </ul>			X	No Title I paid exclusively to a staff member.	
Personnel Activity Reports are completed for all employees whose salary is paid partially by Title I funds and who are working on multiple cost objectives.	<ul style="list-style-type: none"> <li>Monthly reports coinciding with one or more pay periods are completed on the required form for the current fiscal year.</li> <li>The report reflects an after-the-fact distribution of actual activity of each employee.</li> <li>The form contains an account for total activity for which employee is compensated.</li> <li>The form is signed by the employee.</li> </ul>	X			<p>Claudia Taylor and Robyn Roberts have monthly documentation.</p> <p>Summer school staff were not paid with Title I funds.</p>	



# On-Site Compliance Audit Checklist

## Title I, Part A: Inventory Records

District/Charter: Providence Creek      Reviewer: John Hulse

Date: October 24, 2012

### Legislation/Regulation Authority:

EDGAR § 80.32 (d)

- (1) Property records must be maintained that include a description of the property, a serial number or other identification number, the source of property, who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the cost of the property, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.
- (2) A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.
- (3) A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft shall be investigated.

### Intent of the Legislation/Regulation:

To ensure proper accounting for and disposition of property purchased with federal funding.

### Focus of Review:

Ensure that proper documentation and controls are in place to prevent loss, damage, or theft of the property purchased with federal funding.

### Method of Assessment: (Check all that apply)

- ☒ Document Review
- ☐ Observation
- ☐ Interview

### Location of Audit: (Check all that apply)

- ☒ LEA Office..... ☐ Excludes Charters
- ☐ Elementary School..... ☐ Excludes Charters
- ☐ Middle School..... ☐ Excludes Charters
- ☐ High School..... ☐ Excludes Charters
- ☐ Other Agency

**Over the past three years, what guidance, technical assistance, and/or professional development has been offered to the districts and charters regarding this regulation?**

Technical assistance was provided via technical assistance sessions and newsletters.



Required District and Charter School Compliance of Title I, Part A – Equipment Inventory Records	Evidence	Compliance			Comments/Corrective Action	Corrective Action Due Date
		Yes	No	N/A		
Inventory records for approved Title I equipment expenditures (for use in Public and Private schools) for SYS 09-10, 10-11 and 11-12 are available.	Inventory records	X			Classroom inventory lists; Master List	
Inventory records include the following: <ul style="list-style-type: none"> <li>• A description of the equipment</li> <li>• A serial # or other id #</li> <li>• The source of equipment</li> <li>• Who holds the title</li> <li>• Acquisition date and cost</li> <li>• Location, use and condition of equipment</li> <li>• Any disposition data (including date of disposal and sale price)</li> <li>• Note: All equipment at private schools must be marked "Property of XXXX School District"</li> </ul>	Inventory records		X		LEA needs to update inventory records to include the following: 1) Acquisition date and cost 2) Condition of equipment 3) Disposition data, as applicable  LEA must send updated records to demonstrate full compliance.	12/10/12
Inventory has been taken within the last two years	Inventory records	X			Annual inventory	
LEA has a control system in place to prevent loss, damage or theft to federally purchased equipment	A written or verbal description of the LEA's control process. Examples may include sign-out sheets, locked cabinets, inventory cycles, loss records, etc.	X			Sign-out sheets Locked mobile cabinet Equipment repair sheets	

# On-Site Compliance Audit Checklist

## Title I, Part A: Parental Notifications

District/Charter: Providence Creek      Reviewer: John Hulse

Date: October 24, 2012

### Legislation/Regulation Authority:

All school districts receiving Title I funds are required under Section 1111, Section 1116 and Section 1119 of the Elementary and Secondary Education Act (ESEA), as amended by the No Child Left Behind Act (NCLB) are required to notify parents of key Title I requirements. ESEA requires that the SEA monitor LEA compliance with parental notification requirements.

### Intent of the Legislation/Regulation:

LEA must meet the federal requirements to ensure that:

- parents have the necessary information to make well informed choices for their children
- parents have insight into their children's education, the professional qualifications of their teachers, and the quality of the schools they attend

### Focus of Review:

Ensure that LEAs have completed required Title I Parental Notifications

### Method of Assessment: (Check all that apply)

- ☒ Document Review  
☐ Observation  
☐ Interview

### Location of Audit: (Check all that apply)

- ☒ LEA Office..... ☐ Excludes Charters  
☐ Elementary School..... ☐ Excludes Charters  
☐ Middle School..... ☐ Excludes Charters  
☐ High School..... ☐ Excludes Charters  
☐ Other Agency

**Over the past three years, what guidance, technical assistance, and/or professional development has been offered to the districts and charters regarding this regulation?**

Regional Title I technical assistance sessions and guidance documents

Required LEA Compliance Items of Title I, Part A Parent Notifications	Evidence	Compliance			Comments/Corrective Action	Corrective Action Due Date
		Yes	No	N/A		
LEA has disseminated free of charge to parents of students in Title I schools, and to appropriate private school officials or representatives, adequate information about the <b>SEA's written complaint procedures</b> for resolving issues of violation(s) of a federal statute or regulation that applies to Title I, Part A programs. [34 CFR Section 200.11(d)]	Copy of policy distributed and evidence that it was disseminated (e.g. mailing invoice, copy of returned mailing) to <b>parents in Title I schools and to officials from participating Private schools</b>		<b>X</b>		It is on website, parent tab, but that is not sufficient.  LEA must ensure all parents have received notification or notification of where to locate the policy online and by requesting a copy in the main office. LEA must send a copy of notice and date it was distributed to SEA to demonstrate compliance.	<b>12/10/12</b>
LEA has notified <b>parents of their right to know teacher and paraeducator qualifications.</b> [Section 1111(h)(6)(A), ESEA]	Copy of letter distributed and/or samples of other types of notification (e.g. handbook, newsletter, etc.) and evidence that it was disseminated (e.g. mailing invoice, copy of returned mailing)		<b>X</b>		Evidence was not available at time of visit.  LEA must ensure all parents have received notification. LEA must send a copy of notice and date it was distributed to SEA to demonstrate compliance.	<b>12/10/12</b>
LEA has ensured that Title I schools have notified parents if their child has been <b>taught by a non-highly qualified teacher</b> for four or more weeks (this includes long term substitutes). [Section 1111(h)(6)(B)(iii), ESEA]	Copy of letters schools have sent to appropriate parents.			<b>X</b>	100% HQT and an extended teacher absence has not occurred.	
LEA has <b>informed parents of limited English Proficient children</b> in Title I schools how they can be involved in their child's education and active participants in helping their child attain English proficiency and of their right to request regular meetings to discuss their child's achievement. [Section 1112(g)(4), ESEA]	Copy of letters sent to appropriate parents.		<b>X</b>		ELLs speak English in the household (Home Language Survey), but letters still need to be sent.  LEA must ensure all applicable parents have received notification. LEA must send a copy of notice and date it was distributed to SEA to demonstrate compliance.	<b>12/10/12</b>
LEA has distributed the <b>LEA level parent involvement policy</b> (or notice of where to find the policy online or in LEA office) to all parents of children in Title I schools [Section 1118(a)(2), ESEA]	Copy of policy distributed and evidence that it was disseminated (e.g. mailing invoice, copy of returned mailing)	<b>X</b>			Parent involvement policy sent home with students	

<p>LEA has ensured that Title I schools have invited parents to an annual meeting to inform them about the school's participation in Title I, Part A programs and have explained the requirements and their right to be involved. [Section 1118(c)(1) and 2]</p>	<ul style="list-style-type: none"> <li>Evidence that parents were invited to a Title I meeting to discuss the Title I program and their right to be involved (e.g. invitation, newsletter, etc.)</li> <li>Dates and locations of meetings held at each Title I school.</li> </ul>	X	X		<p>The Title I meeting is held as part of the Meet and Greet the Thursday before school starts.</p> <p>Parents were notified about the Meet and Greet, but the Title I meeting portion of the meeting is not printed on the invitation.</p> <p>LEA must ensure parent receive an invitation to a meeting where Title I will be discussed. LEA must provide a copy of the invitation and the date and method it was distributed to the SEA to clear this finding.</p>	12/10/12
<p>LEA has ensured that the principal of each Title I school has attested in writing as to whether the school is in compliance with requirements of Highly Qualified Teachers and Paraeducators [Section 1119(i)(1)(2)]</p>	<p>Copy of signed attestation for each Title I school.</p>	X				



## DEPARTMENT OF EDUCATION

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Mark T. Murphy  
Secretary of Education  
Voice: (302) 735-4000  
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November 8, 2013

Audrey Erschen  
Providence Creek Academy  
273 West Duck Creek Road  
Clayton, DE 19938

Dear Ms. Erschen:

Throughout the 2012-2013 school year, your office provided evidence as requested through periodic monitoring conducted by our Title I Office. The enclosed report outlines the final compliance status for all items that were monitored during that time.

**I am pleased to inform you that your LEA has successfully demonstrated compliance in all of the areas that were monitored under Title I, Part A.** I want to thank you and any other LEA staff for your work in preparing the evidence for our monitoring. Your responses to deadlines were timely and the evidence submitted was organized and thorough.

In addition to the final compliance report, we have attached the final checklists for all areas monitored during the 2012-2013 school year. Please keep copies of your final compliance report and checklists with your Title I, Part A grant files.

We look forward to continuing to work with you during the 2013-2014 school year.

Sincerely,

A handwritten signature in black ink that reads "Susan K. Haberstroh".

Susan K. Haberstroh, MPA, Ed.D.  
Associate Secretary, Education Supports and Innovative Practices

SKH:KW  
Enclosure

cc: Charlie Wilson, Board President  
John Carwell, DDOE  
John Hulse, DDOE  
Ted Jarrell, DDOE  
Kim Wells, DDOE