

Massachusetts Department of Elementary and Secondary Education (MADESE)

September 13-16, 2011

Scope of Review: The U.S. Department of Education's (ED) Student Achievement and School Accountability Programs (SASA) office, Title III State Consolidated Grant Group monitored the Massachusetts Department of Elementary and Secondary Education (MADESE) the week of September 13-16, 2011. This was a comprehensive review of the MADESE's administration of the Title III, Part A program, which is authorized by the Elementary and Secondary Education Act of 1965 (ESEA), as amended.

During the review, the ED team conducted several monitoring activities. The ED team reviewed evidence of State-level monitoring and technical assistance, implementation of the State's Title III accountability system, and fiscal and administrative oversight with the State educational agency (SEA). The ED team also visited three local educational agencies (LEAs) - Springfield Public Schools (SPS), Worcester Public Schools (WPS), and Lawrence Public Schools (LPS) - where they reviewed documentation and interviewed district staff. The ED team also interviewed school staff, parents, and parent representatives in SPS and WPS, and interviewed a private school representative in WPS.

Previous Audit Findings: None

Previous Monitoring Findings: ED last reviewed the Title III, Part A program in the MADESE during the week of November 13-16, 2006. ED identified compliance findings in the following areas:

1. Element 1.1 State Submissions: The MADESE did not submit an official response to the Attachment T conditions on its fiscal year (FY) 2006 Title III grant award, which was due on September 30, 2006.

2. Element 1.1 State Submissions: The MADESE did not submit a written report on the status of the implementation of its plan for the assessment by its LEAs of the English language proficiency, in the domains of reading and writing, of limited English proficient (LEP) children enrolled in Kindergarten through second grade. This report was due on December 31, 2006.

3. Element 2.1 Reservation and Use of Funds: The MADESE did not ensure that its LEAs stayed within the allowable percentage allotment for their Title III administrative costs. At the Boston Public Schools (BPS), the 2003-04 administrative cost set-aside was based on 3.5 percent of its annual allocation instead of the 2 percent maximum.

4. Element 2.2 Allocations, Re-allocations, and Carryover: The MADESE did not ensure that WPS properly recorded its quarterly funding allocations for Title III based on the WPS policy, which was to make its draw requests in quarterly disbursements, each representing 25 percent of the LEA's total allocation amount.

5. Element 2.4 Equipment and Real Property: The MADESE did not maintain or ensure that its LEAs maintained a comprehensive, accurate, and current record of Title III equipment and supplies.

6. Element 2.4 Equipment and Real Property: The MADESE did not ensure that BPS and WPS maintained a master inventory record containing the location, cost, and serial number/asset ID number for each item of equipment purchased.

7. Element 2.5 Other Financial Management Issues: The MADESE did not ensure that purchase orders were created and approved prior to the vendors' invoice dates. Out of a sample of 25 disbursements of Title III funds at the MADESE, six transactions, or 24 percent of the sample universe, involved vendors' invoices where the date of the invoice preceded the date of the approved purchase order.

8. Element 2.5 Other Financial Management Issues: Out of the sample of 25 disbursements of Title III funds at the MADESE, two transactions, or eight percent of the sample universe, contained adjustments to the reimbursement form without the initials of the person making the adjustment or a justification for the adjustment.

9. Element 2.5 Other Financial Management Issues: The MADESE did not ensure disbursements were for Title III purposes. Out of the sample of 25 disbursements of Title III funds at the MADESE, one disbursement was made to McInnis Consulting Services in the amount of \$2,800.00 for consulting services.

10. Element 2.5 Other Financial Management Issues: Out of the sample of 24 disbursements of Title III funds at the WPS, supporting documentation for two of the disbursements, or eight percent of the sample universe, did not include a date and a corresponding invoice number on the vendors' invoices.

11. Element 2.5 Other Financial Management Issues: Out of the sample of 24 disbursements to the WPS, supporting documentation for two disbursements, or eight percent of the sample universe, did not include the vendor's tax identification number or Social Security number on the invoice and the approved contract.

12. Element 2.5 Other Financial Management Issues: Out of the sample of 24 disbursements to the WPS, supporting documentation for two of the disbursements, or eight percent of the sample universe, did not include a date of approval on its corresponding contract.

13. Element 3.2 English language proficiency (ELP) Assessments: The MADESE did not assess LEP children in grades K-2 for English language proficiency in the domains of reading and writing during the 2005-2006 school year, or during any prior year since No Child Left Behind (NCLB) took effect.

14. Element 3.2 ELP Assessments: The MADESE did not ensure that all LEAs in the State assessed all LEP students for English language proficiency in the domains of listening and speaking during the 2005-2006 school year.

15. Element 3.2 ELP Assessments: Massachusetts is using Massachusetts English Proficiency Assessment-Reading Writing (MEPA-R/W) and MELA-O data from the 2004-2005 school year as its baseline year for Title III. The MADESE has not conducted comparability analysis regarding the relationship of the ELP assessment used in 2003-2004, the Language Assessment Scales (LAS), to the MEPA or the MELA-O.

16. Element 3.4 Annual Measurable Achievement Objectives (AMAOs): Massachusetts did not make Title III AMAO determinations which incorporated English language proficiency assessment information in the domains of reading, writing, listening, and speaking for grades K-2 for the 2005-2006 school year, or for any prior year since No Child Left Behind (NCLB) took effect.

17. Element 4.4 Activities by Agencies Experiencing Substantial Increases in Immigrant Children and Youth: Massachusetts did not make subgrants in school years 2004-2005 or 2005-2006 pursuant to section 3114(d) of the ESEA, which requires States receiving Title III awards to reserve a portion of their grant, up to 15 percent, to make subgrants to LEAs that experience a significant increase, as compared to the average of the two preceding fiscal years, in the percentage or number of immigrant children and youth enrolled in schools within the jurisdiction of such LEAs.

18. Element 5.2 Private School Participation: The MADESE did not ensure that all LEAs in the State complied with the requirement to ensure the annual English language proficiency assessment of LEP private school students receiving Title III services in the domains of reading, writing, listening, and speaking.

19. Element 7.1 Parental Notification: The MADESE did not monitor whether Title III-served LEAs issued parental notifications for failure to make AMAOs in 2005.

Monitoring Indicators for Title III, Part A

State Monitoring of Subgrantees			
Element Number	Description	Status	Page
	State Monitoring of Subgrantees sections 3115, 3116, 3121, 3122, and 3302; EDGAR 34 CFR 80.40	Finding	4

State Monitoring of Subgrantees

State Monitoring: The State has a process to monitor subgrantees and the evaluation components of the monitoring plan address the requirements under sections 3113, 3115, 3121, 3122 and 3302 of the ESEA of 1965, as amended.

Finding: The MADESE did not provide evidence that its processes for subgrantee monitoring provide sufficient oversight to ensure that all Title III requirements are met. Specifically, the MADESE’s Program Quality Assurance (PQA) unit only monitors four components of Title III: annual English language proficiency assessment, parental notification, professional development, and monitoring of former LEP students. Furthermore, the MADESE did not demonstrate that it collects sufficient evidence when monitoring these four components of Title III to ensure that LEAs are meeting Title III requirements in these areas.

Citation: Section 80.40 of the Education Department General Administrative Regulations (EDGAR) states that grantees must monitor grant and subgrant activities to ensure compliance with applicable Federal requirements.

Further action required: The MADESE must revise its monitoring protocol and procedures to include all Title III requirements and strengthen its evidence collection process in order to adequately assess whether subgrantees are meeting Title III requirements. The MADESE must submit to ED the revised monitoring protocol and procedures and documentation that demonstrate that it has strengthened its evidence collection process.

Standards, Assessments and Accountability			
Element Number	Description	Status	Page
Element 1.1	English Language Proficiency (ELP) Standards section 3113	Met requirements	N/A
Element 1.2	ELP Assessment sections 3113 and 3116	Finding	5
Element 1.3	Annual Measurable Achievement Objectives (AMAOs) sections 3122(a)(1)(2)(3) and 1111(b)(2)(B)	Met requirements	N/A
Element 1.4	Data Collection and Reporting sections 3121 and 3123; EDGAR 34 CFR 76.731	Met requirements	N/A

Monitoring Area 1: Standards, Assessments and Accountability

Element 1.2 - ELP Assessment: The State provided evidence of a process that complies with section 3113 of the ESEA and evidence that an ELP assessment has been administered to all K-12 limited English proficient (LEP) students in the State.

Finding: The MADESE has not ensured that all LEAs in the State annually assess all identified LEP students for English language proficiency. In one LEA visited, representatives reported that in spring 2011, only 70% of LEP students in high school were administered the annual ELP assessment. Additionally, LEA representatives were unable to provide definitive reasons for this low participation rate. In another LEA visited, representatives reported that, in a prior year, only 80% of LEP students were administered the annual ELP assessment.

Citation: Section 3113(b)(3)(D) of the ESEA requires Title III subgrantees to annually assess the English language proficiency of all LEP children participating in a program funded under this subpart. Section 1111(b)(7) of the ESEA requires that all LEAs in the State annually assess the English language proficiency of all LEP children.

Further action required: The MADESE must provide written guidance and information regarding the K-12 ELP assessment requirement to all LEAs in the State and develop and implement procedures to ensure that all LEAs in the State are complying with this requirement. The MADESE must provide to ED evidence that it has provided written guidance and information to LEAs and evidence that the aforementioned procedures have been implemented.

Instructional Support			
Element Number	Description	Status	Page
Element 2.1	State-Level Activities section 3111 (b)(2)	Met requirements	N/A
Element 2.2	State Oversight and Review of Local Plans sections 3116(a) and 3115(c); EDGAR 34 CFR 76.770	Met requirements	N/A
Element 2.3	Activities by Agencies Experiencing Substantial Increases in Immigrant Children and Youth sections 3114 and 3115	Findings	6-7
Element 2.4	Private School Participation section 9501	Findings	7-8
Element 2.5	Parental Notification and Outreach section 3302	Finding	8-9

Monitoring Area 2: Instructional Support

Element 2.3 - Activities by Agencies Experiencing Substantial Increases in Immigrant Children and Youth: The subgrantee receiving funds under section 3114(d)(1) of the ESEA shall use the funds to pay for activities that provide enhanced instructional opportunities for immigrant children and youth.

Finding (1): The MADESE did not correctly apply eligibility requirements for Title III immigrant children and youth subgrants. Specifically, the MADESE only considered LEAs that were already recipients of Title III LEP formula subgrants when determining eligibility for immigrant subgrants. Title III does not require that LEAs be recipients of Title III formula subgrants as a prerequisite for receiving an immigrant subgrant.

Citation: Section 3114(d)(1) of the ESEA indicates that Title III immigrant subgrants should be awarded to eligible entities in the State that have experienced a significant increase, as compared to the average of the two preceding fiscal years, in the percentage or number of immigrant children and youth who have enrolled during the fiscal year preceding the fiscal year for which the subgrant is made, in public and nonpublic elementary and secondary schools in the geographic areas under the jurisdiction of, or served by, such entities.

Further action required: The MADESE must revise its eligibility requirements for Title III immigrant subgrants for the 2012-2013 school year to meet the Title III statutory requirement outlined above. The MADESE must provide to ED its revised eligibility requirements and a list of LEAs that have received immigrant subgrants for the 2012-2013 school year.

Finding (2): The MADESE has not provided sufficient guidance to LEAs regarding the Title III immigrant subgrant program, including how the activities authorized under this program differ from required and authorized activities under the LEP formula subgrant program. Additionally, the MADESE has not provided sufficient information to LEAs regarding which students are eligible for services under this program. Specifically, representatives from one LEA visited did not clearly understand that students from Puerto Rico should not be counted as immigrants under the Title III immigrant children and youth subgrant.

Citation: Section 3115(e) of the ESEA provides a list of activities that LEAs experiencing substantial increases in immigrant children and youth may carry out to provide enhanced instructional opportunities for immigrant children and youth.

Section 3301(6) of the ESEA defines immigrant children and youth as individuals who ‘...were not born in any State.’ Section 3301(14) of the ESEA defines State as ‘...each of the fifty States, the District of Columbia, and the Commonwealth of Puerto Rico.’

Further action required: The MADESE must provide written guidance and technical assistance to LEAs regarding: 1) activities authorized under the Title III immigrant grant program, and 2) the definition of the term ‘immigrant’ for the purpose of this program. The MADESE must provide evidence to ED of this written guidance and technical assistance activities.

Element 2.4 - Private School Participation: LEAs comply with ESEA requirements regarding participation of LEP students and teachers in private schools in Title III.

Finding(1): The LEAs visited did not provide sufficient evidence of timely and meaningful consultation with representatives from non-public schools located in their geographic jurisdictions.

Citation: Section 9501(c)(1)(D) of the ESEA requires that Title III-funded LEAs conduct timely and meaningful consultation with appropriate private school officials regarding services to LEP students enrolled in non-public schools within their geographic jurisdiction.

Further action required: The MADESE must develop a timeline and plan to provide technical assistance to Title III subgrantees on the requirements in section 9501 of the ESEA. This technical assistance must address the requirement to conduct timely and meaningful consultation with private school officials, as well as other requirements under this section that pertain to the provision of services to LEP students enrolled in non-public schools. The MADESE must provide to ED this timeline and plan, as well as evidence of its implementation, such as agendas for technical assistance meetings, written communications to LEAs, or other materials.

Finding(2): The MADESE has not ensured that Title III subgrantees have accurately counted: 1) the number of LEP students enrolled in non-public schools, or 2) the number of LEP non-public school students served using Title III funds. There were discrepancies between the numbers of non-public school LEP students reported by LEAs on the MADESE’s form 5 and the State non-public school LEP student counts. In the LEAs visited, staff was unable to confirm the

accuracy of the number of non-public school LEP students reported on form 5, and how this number compared with the number of LEP students in non-public schools served using Title III funds.

In order for LEAs to provide equitable services, they must first be able to accurately identify the number of LEP students enrolled in non-public schools in their geographic jurisdiction.

Citation: Section 80.40 of EDGAR states that subgrantees must determine on a basis comparable to that used by the subgrantee in providing for participation of public school students the number of those students who will participate in a project.

Further action required: The MADESE must develop and implement procedures to collect and verify data on non-public school LEP students identified and served under Title III to ensure the accuracy of LEA counts of non-public school LEP students. The MADESE must submit the procedures to ED, as well as evidence that they have been implemented, such as sample counts of non-public school LEP students reported and served in Title III-funded LEAs.

Element 2.5 - Parental Notification and Outreach: Parental notification in an understandable format as required under section 3302 of the ESEA for identification and placement and for not meeting the State AMAOs.

Finding: The MADESE has not ensured that Title III subgrantees comply with the parental notification requirements in section 3302(a) of the ESEA. This section of the ESEA describes eight types of information that must be included in such notifications. The LEAs visited did not provide evidence that parental notifications contained all of this information. Additionally, parent representatives in one LEA reported that they did not receive Title III-required notifications in any language other than English.

Citation: Section 3302(a) of the ESEA requires subgrantees to provide parents of LEP children participating in or identified for participation in a Title III-funded program with notification regarding such placement. This notification must provide information regarding: the reasons for identification of their child as LEP, the child's level of English proficiency, method of instruction, how the program will meet the child's educational needs and help him/her learn English, exit requirement from the program, information regarding parental rights, and, in the case of a child with a disability, how such program meets the objectives of the individualized educational program of the child.

Section 3302(c) requires that the information provided under section 3302(a) of the ESEA be provided in an understandable and uniform format and, to the extent practicable, in a language that the parent can understand.

Further action required: The MADESE must provide updated written guidance to its subgrantees regarding the parental notification requirements for identification and placement in Title III language instruction educational programs. The MADESE must also include parental notification for identification and placement in its Title III monitoring protocol and/or

procedures. The MADESE must submit to ED a copy of the guidance provided to Title III subgrantees and the State's revised Title III monitoring protocol and procedures.

Fiduciary			
Element Number	Description	Status	Page
Element 3.1	State Allocations, Reallocations and Carryover section 3111(b); 20 USC 6821(b)(3); sections 3114(a)-(d)	Findings	10-12
Element 3.2	District Allocations, Reallocations and Carryover section 3115	Met requirements	N/A
Element 3.3	Maintenance of Effort sections 1120A and 9021	Met requirements	N/A
Element 3.4	Supplement, Not Supplant - General section 3115(g)	Findings	12-14
Element 3.4A	Supplement, Not Supplant - Assessment sections 1111(b)(7) and 3113(b)(2)	Met requirements	N/A

Monitoring Area 3: Fiduciary

Element 3.1 - State Allocations, Reallocations and Carryover: The SEA complies with required provisions.

Finding (1): The MADESE has not utilized Title III funds for expenditures that are necessary and reasonable to run the Title III program. Specifically, the MADESE employs staff whose salaries are paid 100% with Title III funds, but who are assigned other duties and responsibilities in addition to or other than Title III. The salaries of six MADESE staff members are funded 100% with Title III funds, but the staff members do not devote 100% of their time to the Title III program as evidenced by the following:

- The job description provided for the Director of the Office of English Language Acquisition and Academic Achievement (OELAAA) at the MADESE includes the responsibility for implementing requirements under State law governing services to LEP students.
- Three job descriptions for employees funded 100% with Title III funds in OELAAA include activities related to participation in monitoring of school districts for compliance with both State and Federal laws and regulations relating to the education of LEP students.
- The English Language Learner (ELL)/Sheltered English Immersion Coordinator description includes the duty “Represent OELAAA on matters pertaining to educator licensure and ELL/Sheltered English Instruction professional development.”

Furthermore, the duties for two positions are not related to Title III activities. The duties for one position include providing administrative support for the Curriculum and Instruction Center where the OELAAA is located. The duties for the second position include serving as a mathematics targeted assistance specialist.

Citation: 2CFR 225 (Office of Management and Budget (OMB) Circular A-87) requires that in order for costs to be allowable under Federal awards, they must be reasonable, necessary, and allocable. Section 3115(g) of the ESEA requires that Title III funds be used to supplement the level of Federal, State, and local public funds that, in the absence of such availability, would have been expended for programs for LEP children and immigrant children and youth and in no case to supplant such Federal, State and local public funds.

Further action required: The MADESE must immediately make changes to current staff allocations so that Title III funds are not used to support SEA staff that do not have duties and responsibilities for implementation of the Title III program. The MADESE must provide ED with evidence that it has taken this action, such as budget documents with staff salaries, revised job descriptions, samples of current time and effort logs, and other documentation that demonstrates that Title III funds are no longer utilized to support non-Title III related staff and activities.

Finding (2): The MADESE is not following the requirement in the Tydings Amendment that Title III funds are available to subgrantees for a twenty-seven month period of availability for subgrants under the Tydings Amendment. Additionally, the MADESE did not demonstrate that it has clear policies and procedures in place to reallocate Title III funds. The MADESE uses an annual twelve-month grant award period for Title III grant funds that starts on September 1 and ends on August 31. LEAs that do not expend all of their Title III funding during this timeframe are required to return to the MADESE all unused funds within sixty days after grant closure on August 31. If an LEA returns funds, the MADESE permits the LEA to reapply for these unused funds as carryover. In previous years, these returned and unused funds were reallocated to LEAs at the discretion of the MADESE staff.

Citation: Under the Tydings Amendment, Section 421(B) of the General Education Provisions Act (GEPA), 20 U.S.C. 1225(b), SEAs and LEAs have 27 months, extending from July 1 of the fiscal year for which the funds were appropriated through September 30 of the second succeeding fiscal year, to obligate Title III funds. Section 3114(c) of the ESEA states that an SEA may only reallocate LEA subgrant funds if it has determined that funds awarded under section 3114(a) will not be used by an LEA for their intended purpose.

Further action required: The MADESE must ensure that its Title III subgrantees have use of the Title III funds awarded under section 3114(a) of the ESEA for the 15-month period of initial availability plus a 12-month period for carryover unless the MADESE has determined that the Title III funds will not be used by an LEA for the purpose for which they were awarded. The MADESE must provide to ED evidence that it has complied with this requirement, such as subgrant award notifications reflecting the 27-month period of availability of funds and communications to LEAs regarding the timeline for fund availability.

Finding (3): The MADESE did not provide sufficient evidence that its cash management procedures for allowing the drawdown of funds by LEAs meet the requirements in OMB Circular A-102 and 34 C.F.R. 80.21(c). Specifically, the MADESE allows LEAs to draw down funds based on estimated expenditures for the upcoming month, rather than for expenditures made during the previous month. This accounting procedure allows an LEA to carry cash on hand for the entire twelve month State-defined life cycle of the grant.

Citation: OMB Circular A-102 and 80.21(c) require a State to use methods and procedures for transferring funds that minimize the time elapsing between the transfer to recipients of grants and the recipients' need for the funds.

Further action required: The MADESE must review and revise its cash management procedures, including drawdown policies, as they apply to Title III subgrants, to ensure that they meet the requirements in OMB Circular A-102. The MADESE must provide to ED a timeline and plan for the review and revisions, as well as evidence that it has implemented the revised procedures.

Element 3.4 - Supplement, Not Supplant - General: The SEA ensures that the LEA complies with the provision related to supplement, not supplant under section 3115(g) of the ESEA.

Finding (1): The MADESE has not ensured that Title III subgrantees comply with the supplement, not supplant requirement as it applies to core educational programs that should be provided to all students, as evidenced by the following:

- One LEA visited is utilizing Title III funds to provide a summer school program for high school ELLs who require one credit to graduate. These students failed the regular school course and another summer school course and are enrolled in a Title III-funded sheltered instruction course specifically designed for ELLs needing one credit in mathematics or science in order to graduate.
- In another LEA visited, seven teachers whose salaries were funded 100% with Title III funds were providing content-based English as a second language courses during their preparation time, which is during the regular school day for students. The courses were taught during the regular school day and were for credit. These positions were funded with Title III funds in FY2010.
- One LEA reported using Title III funds to fully fund eight instructional assistants to support small-group instruction in content classes. LEA staff reported that these eight positions were to be used for class size reduction. There is no difference between the job description of these staff and twelve or more other instructional assistants.

Citation: Section 3115(g) of the ESEA requires that Title III funds be used to supplement the level of Federal, State, and local public funds that, in the absence of such availability, would have been expended for programs for LEP children and immigrant children and youth and in no case to supplant such Federal, State and local public funds.

Further action required: The MADESE must develop and implement a comprehensive corrective action plan that includes a timeline, implementation steps, and staff resources, to annually ensure Title III subgrantees comply with the supplement, not supplant requirement. As part of this plan, the MADESE must provide updated written guidance to its subgrantees regarding the supplement, not supplant requirement, and include monitoring for compliance with this requirement in its Title III monitoring protocol and procedures. The plan must specifically address application of the supplement, not supplant requirement to the use of Title III funds to support personnel. The MADESE must submit to ED this plan, along with evidence of implementation.

Finding (2): The MADESE has not ensured that Title III subgrantees comply with the supplement, not supplant requirement as it applies to translation and interpretation activities as evidenced by the following:

- One LEA visited has a line item in its Title III FY2012 budget for publication of materials that are for distribution to parents and others in the LEA. These materials are not specific to the Title III services that the LEA provides, but are related more generally to educational services required under Title VI and related requirements.
- One LEA visited has contracted the services of an individual to provide translation and interpretation for Somali speakers on general educational information.

Citation: Section 3115(g) of the ESEA requires that Title III funds be used to supplement the level of Federal, State, and local public funds that, in the absence of such availability, would have been expended for programs for LEP children and immigrant children and youth and in no case to supplant such Federal, State and local public funds.

Further action required: The MADESE must develop and implement a comprehensive corrective action plan, including a timeline, implementation steps, and staff, to annually ensure correct implementation of the supplement, not supplant requirement. As part of this plan, the MADESE must provide updated written guidance to its subgrantees regarding the supplement, not supplant requirement, and include monitoring for compliance with this requirement in its protocol and/or procedures used to monitor subgrantees for implementation of Title III. The plan must specifically address application of the supplement, not supplant requirement to use of Title III funds for translation and interpretation activities. The MADESE must submit to ED this plan, along with evidence of implementation.

Finding (3): The MADESE has not ensured that Title III subgrantees comply with the supplement, not supplant requirement in their use of funds to support professional development activities. Two LEAs visited provided evidence that they have used Title III funds for expenditures related to required training on Sheltered English Instruction (SEI). Title III funds were used for stipends for teachers to attend SEI trainings, contracts for trainers to provide SEI trainings, and for substitutes for teachers attending these trainings.

Citation: Section 3115(g) of the ESEA requires that Title III funds be used to supplement the level of Federal, State, and local public funds that, in the absence of such availability, would have been expended for programs for LEP children and immigrant children and youth and in no case to supplant such Federal, State and local public funds.

Further action required: The MADESE must immediately inform all LEAs in writing that Title III funds may not be used to pay for costs related to required training. The MADESE must also conduct a review of subgrantee budgets to identify current or proposed expenditures for SEI training, and inform subgrantees with these expenditures that they must immediately discontinue this practice of using Title III funds for SEI training. The MADESE must provide to ED evidence of its written communication to LEAs, a summary from the review of subgrantee budgets, and documentation of communication to those subgrantees identified as having current or proposed expenditures for SEI training in their Title III plans.