



California Department of Education Federal Program Monitoring 2021-22 Notification of Findings

March 11, 2022

This is the official Notification of Findings (NOF) report of the review visit conducted by the California Department of Education (CDE). Because the methodology of the review involves sampling, it is not an assessment of all legal requirements. Nevertheless, the local educational agency (LEA) is responsible for operating its federal categorical programs in compliance with all applicable laws and regulations.

Local Educational Agency: West Contra Costa Unified (07617960000000)

Review Date(s): 03/07/2022 - 03/11/2022

Regional Team Leader(s): Arik Rub, 916-319-0953

FPM Coordinator(s): Lyn Potter, 510-307-4500
Raquel Flores, 510-307-4507

Program Reviewed	Program Reviewer	Total Findings
Adjusted Cohort Graduation Rate (ACGR)	Wendy Jenkins	0
Adult Education (AE)	Abygail Medina	3
Federal Stimulus Monitoring (CA)	Lorene Euerle	9
Compensatory Education (CE)	Kyle Holmes	6
Career Technical Education (CTE)	Bryan Baker	1
Education Equity (EE)	Murjani McTier	10
English Learner (EL)	Emily Ingram	11
Fiscal Monitoring (FM)	Brian Hayano	4
Supporting Effective Instruction (SEI)	Jill Johnson	7
School Support and Improvement (SSI)	Kyle Holmes	1

The LEA is required to resolve each Federal Program Monitoring (FPM) finding within 45 calendar days which ends on 04/25/2022. Corrective actions made to resolve findings must be implemented at all sites in the LEA and the new procedures must be used in the future.

When a FPM finding cannot be resolved within this 45 calendar day period, the LEA submits a resolution agreement request using the "Resolution Agreement" process via CMT. Authorized LEA staff may request suggestions from CDE staff on the resolution of findings.

NOTE: Copies of this report were distributed to the Agency. This is a public report and must be made available upon request. (California Public Records Act, Government Code section 6250)

Sites Reviewed	Programs Reviewed
De Anza High (07617960732164)	CTE, CE, EL



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Sites Reviewed	Programs Reviewed
El Cerrito High (07617960732941)	CTE
Greenwood Academy (07617960733253)	CTE
Helms Middle (07617966057228)	CE, EL, SSI
Hercules High (07617960730598)	CTE
John F. Kennedy High (07617960733659)	CTE
Lake Elementary (07617966004824)	CE, EL, SSI
Pinole Valley High (07617960735316)	CTE
Richmond High (07617960735902)	CTE, CE, EL
West Contra Costa Adult Education (07617960735928)	AE

Monitoring Results by Program

Adjusted Cohort Graduation Rate

No program findings resulted from this monitoring review. No further action is required.

Adult Education

1. AE 02: Financial Accountability

Agencies must use funds made available for adult education and literacy activities to supplement and not supplant other state or local public funds expended for adult education and literacy activities.

Agencies' local financial management system must provide for the effective control and accountability for all funds, property, and other assets, and must adequately safeguard all assets and assure that they are used solely for authorized purposes.

The governing board of each school district shall establish and maintain a historical inventory, or an audit trace inventory system, or any other inventory system authorized by the State Board of Education (SBE), which shall contain the description, name, identification numbers, and original cost of all items of equipment acquired by it whose current market value exceeds five hundred dollars (\$500) per item, the date of acquisition, the location of use, and the time and mode of disposal.

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Agencies must properly charge and document salaries and wages that are reasonable, necessary, and allowable in accordance with applicable program requirements.

Any shared costs or matching funds and all contributions, including cash and third party in-kind contributions, are accepted when such contributions meet all of the following federal criteria, as part of the agency's cost sharing or matching:

- (a) Are verifiable from the non-federal entity's records;
- (b) Are not included as contributions for any other federal award;
- (c) Are necessary and reasonable for accomplishment of product or program objectives;
- (d) Are allowable under subpart E—cost principles of 2 Code of Federal Regulation (2 CFR) Part 200;
- (e) Are not paid by the federal government under another federal award, except where the federal statute authorizing a program specifically provides that federal funds made available for such program can be applied to matching or cost sharing requirements of other federal programs;
- (f) Are provided for in the approved budget when required by the federal awarding agency; and
- (g) Conform to other provisions of 2CFR Part 200, as applicable.

Financial records, supporting documents, statistical records, and all other records pertinent to a federal award must be retained for a period of three years from the date of submission of the final expenditure report.

In a recent review of the West Contra Costa Unified School District (WCCUSD) Adult Education Program, WCCUSD did not submit evidence to address the above legal requirements. As a result, the CDE is unable to determine if salaries and benefits were properly charged to the adult education program. Additionally, the CDE reviewer was unable to request a sampling of employees for Time and Effort records absent of the Staff Funding Reports. General Ledgers uploaded into the CMT did not provide sufficient information to determine if federal funds were used according to the intent and purposes of the grant.

The WCCUSD must submit the following documents into the CMT to address the above legal requirements: Staff Funding Reports for current and prior three years; Time and Effort Records (Semi-annual Certification, Personnel Activity Reports [PARs] or equivalent documentation) for current and prior year for employees funded fully and in part with federal Workforce Innovation and Opportunity Act - Adult Education and Family Literacy Act funds; Calculation of Other Non-federal funds reported in the final Expenditure Claims Requests (ECRs) for current and prior three years; Equipment Inventory records; and purchase orders/invoices identified in the General Ledgers below:

- GL 2021-22: Line 138 11-3926-4300-408 2022 6 12/14/21 API 390 1,046 AP121421

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Actuals 600.00 INV# 122 PO#20222148

- GL Year 2020-21: Line 183 11-3905-4360-408 2021 12 06/07/21 GEN 206 1 Actuals 2,184.00 10 CAMERAS FRM IT DEPT
- GL Year 2018-19: Line 148 11-3905-4360-408 2019 12 06/29/19 GEN 1,219 3 Actuals 2,192.85 LENOVO JE 4TV s TORS3905; and, Line 149 11-3905-4460-408 2019 12 06/29/19 GEN 1,219 4 Actuals 2,358.71 LENOVO JE 4TV s TORS3905

If the WCCUSD fails to provide the requested documentation for review, or if the documentation does not meet federal requirements, the WCCUSD may be required to reimburse the CDE up to the total amount of \$681,610.00 claimed in the ECRs for Object Codes 1000-3000 in the current and prior three years.

2. AE 04: Staff Qualifications and Professional Development

Agencies' activities must be delivered by well-trained instructors, counselors, and administrators who meet any minimum qualifications established by the state, where applicable, and who have access to high quality professional development (PD), including through electronic means. This requirement may be met by complying with the requirements set forth in California Education Code (EC) Sections 44258 and 44865.

In a review of certificated and classified staff working in the Adult Education Program at WCCUSD, it was revealed that two staff members with Designated Subjects Adult Education credentials were teaching English as a Second Language (ESL) classes without the corresponding ESL subject designation.

The LEA must submit to the CMT evidence of emergency clearances for ESL authorization or a plan to address the two misassigned teachers either through replacement or side-by-side instruction until the teachers are able to obtain appropriate ESL authorization.

3. AE 09: Effective Use of Technology and Distance Learning

Agencies must effectively use technology, services, and delivery systems, including distance education in a manner sufficient to increase the amount and quality of learning and how such technology, services, and systems lead to improved performance.

WCCUSD did not submit evidence to demonstrate that the agency maintains a historical record of equipment Inventory (evidence also required to submit for AE instrument item 02) which is needed to address the above requirement.

The LEA must submit to the CMT a historical equipment inventory of record. The historical inventory records must include purchases made for Adult Education in the current (2021-22) and prior three fiscal years (2020-21, 2019-20 and 2018-19) with an acquisition cost of \$500 or more per unit (original price).

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Federal Stimulus Monitoring

1. CA 01: Time and Effort Requirements

To support salaries and wages for employees that work on federal programs, LEAs are required to maintain time and effort records that accurately reflect the work performed. These time and effort records must: (1) be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated; (2) be incorporated into the official records of the LEA; (3) reasonably reflect the total activity for which the employee is compensated by the LEA, not exceeding 100 percent of compensated activities; (4) encompass both federally assisted and all other activities compensated by the LEA on an integrated basis, but may include the use of subsidiary records as defined in the LEA's written policy; (5) comply with the established accounting policies and practices of the LEA; and (6) support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity. Budget estimates or percentages determined before the services are performed alone do not qualify as support for charges to Federal awards.

The LEA failed to provide time and effort documentation to support the salaries and benefits charged to the Elementary and Secondary School Emergency Relief (ESSER) and the Governor's Emergency Education Relief (GEER) funds. During interviews with staff, it was confirmed that the LEA did not maintain time and effort documents to support that the salaries charged to ESSER and GEER funds were to prevent, prepare for, or respond to the pandemic. As a result, the LEA is unable to substantiate that \$14,099,554.71 in salaries charged to the Federal Stimulus funds were allowable and properly supported, including \$1,341,472.34 in salaries and benefits charged to ESSER I – Resource Code 3210; \$12,148,988.27 in salaries and benefits charged to ESSER II – Resource Code 3212; \$276,043.78 in salaries and benefits charged to ESSER III – Resource Code 3213; \$304,859.66 in salaries and benefits charged to ESSER III – Resource Code 3219; and \$28,190.66 in salaries and benefits charged to GEER I – Resource Code 3215.

The LEA must provide evidence to substantiate that it transferred \$14,099,554.71 in unrestricted funds to reimburse the Federal Stimulus programs for the salaries and benefits that were not properly supported. Specifically, the LEA must reimburse \$1,341,472.34 to ESSER I – Resource Code 3210; \$12,148,988.27 to ESSER II – Resource Code 3212; \$276,043.78 to ESSER III – Resource Code 3213; \$304,859.66 ESSER III – Resource Code 3219; and \$28,190.66 to GEER I – Resource Code 3215. The evidence of these transfers must be uploaded in the CMT for review. Additionally, the LEA must update its time and effort policies and procedures to ensure that they include the procedures for properly documenting salaries and benefits charged to the Federal Stimulus funds. Furthermore, the LEA will need to provide training to staff on the updated policies and procedures and upload evidence of the training in the CMT for review, including the training presented and who attended the training.

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2. CA 02: Procedures and Internal Controls

LEAs are required to maintain documentation to substantiate that all costs charged to the federal programs are reasonable, necessary, allocable and allowable in accordance with applicable program requirements.

During a review of the LEAs policies and procedures, it was determined that the LEA did not have procurement or equipment policies and procedures that met federal requirements. Specifically, the LEA's procurement policy did not include the California Public Contract Code (PCC) bidding thresholds specified in Section 20111. Also, the LEA's equipment procedures did not conform to the equipment standards identified in 2 CFR Section 200.313 (d) and California Education Code (CA Ed Code) Section 31568 that requires an LEA to include the percent of federal participation for the program under which the property was acquired.

The LEA must revise its policies and procedures to ensure compliance with federal requirements. Specifically, the LEA must update its procurement procedures to ensure it includes all required elements are properly identified in accordance with 2 CFR sections 200.317 through 200.327. In addition, The LEA must revise its equipment procedures to ensure all required elements are properly identified in accordance with 2 CFR 200.313(d) and CA Ed Code 31568, including the percent of federal participation for the equipment. Once the policy and procedures are revised, the LEA must upload them into the CMT for review of compliance.

3. CA 04: Procurement

The LEA must follow appropriate procurement processes for its contracts. In addition, the LEA must demonstrate that it used arm's length bargaining and received a fair price for its contracts in accordance with federal and state requirements. Furthermore, the LEA must document that all procurement through noncompetitive proposals only occurred because the item was only available from a single source, an emergency would not permit a delay, the CDE expressly authorized noncompetitive proposals in writing, or after solicitation of sources, competition was deemed inadequate.

The LEA failed to provide the requested procurement documentation the CDE requested for a sample of its expenditures charged to the Federal Stimulus Funds including \$2,319,190.41 charged to ESSER I, \$3,093,518.55 charged to ESSER II, \$2,927,956.99 charged to ESSER III, and \$308,784.67 charged to the Governor's Emergency Education Relief I. As a result, the LEA is unable to substantiate that the appropriate procurement processes were followed for a total of \$8,649,450.62 in Federal Stimulus expenditures.

To determine whether the appropriate procurement processes were followed, the LEA must upload into the CMT the requested procurement documentation for review. If the LEA does not upload the documentation, or the documentation does not meet federal requirements, the LEA may be required to reimburse up to \$8,649,450.62 in Federal Stimulus funds, including \$2,319,190.41 charged to ESSER I, and \$3,093,518.55 charged to ESSER II, \$2,927,956.99 charged to ESSER III, and \$308,784.67 charged to the GEER I.

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4. CA 05: Equipment/Inventory Management

LEAs must maintain documentation to substantiate that all equipment purchases are reasonable, necessary, and allowable in accordance with federal, state and program requirements and the equipment inventory listing includes all required elements. Also, the LEA must establish and maintain a historical inventory system for equipment with an acquisition cost of \$500 or more per unit that contains all the required elements. Furthermore, the LEA must obtain prior written approval from CDE in order for capital expenditures purchased with GEER I, GEER II, ESSER II, and ESSER III funds to be allowable. In addition, the LEA must conduct a physical inventory of the property and the results must be reconciled with the property records at least once every two years.

During the review of the LEA's inventory listing, CDE determined that the listing did not include all the required elements, or evidence that a physical check of the inventory has been conducted at least once every two years. Specifically, the inventory listing included equipment that appeared to be split funded; however, the percentage of Federal Award used to purchase the equipment was not identified on the inventory.

The LEA must upload to the CMT an updated inventory listing for equipment purchased with GEER I, GEER II, ESSER I, ESSER II, or ESSER III funds that includes all required elements and the percentage of the Federal Award that funded the equipment. In addition, LEA must provide evidence that a physical inventory has been conducted in accordance with federal and state requirements.

5. CA 07: Reporting

The LEA is required to properly report expenditures to CDE for the Coronavirus Relief funds (CRF), GEER I, GEER II, ESSER I, ESSER II, and ESSER III; and the LEA is required to submit, no later than 90 calendar days after the end of the period of performance, all financial, performance, and other reports as required by federal and state requirements.

During CDE's review of the LEAs general ledger and the quarterly Federal Stimulus expenditures reported to CDE, it was determined that the LEA was unable to support the amount of ESSER II expenditures it reported to CDE. Specifically, the LEA reported \$15,508,830.00 in ESSER II expenditures as of the December 31, 2021 reporting period; however, the LEA's general ledger included \$15,505,959.67 in ESSER II expenditures, a variance of \$2,870.33.

The LEA must provide evidence to substantiate that it properly reported ESSER II expenditure to CDE. If the LEA is unable to support the expenditures it reported to CDE during the December 31, 2021 reporting period, it must provide evidence that it properly reported ESSER II expenditures to CDE for the March 31, 2022 reporting period. Specifically, the LEA must upload its March 31, 2022 general ledger in CMT to substantiate the ESSER II expenditures are properly reported to CDE.

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6. CA 08: Equitable Services

The LEA is responsible for providing equitable services in the same manner as provided under section 1117 of the ESEA of 1965 to students and teachers in non-public schools (NPS) and conducting a consultation to ensure the NPS wished to participate in the ESSER I and GEER I program. Also, the LEA is responsible for maintaining control of funds for the services and assistance provided to a non-public school and title to materials, equipment, and property purchased with such funds.

The LEA failed to provide CDE all of the requested documentation to support \$2,010.08 in ESSER I expenditures. As a result, the LEA is unable to substantiate that the \$2,010.08 in expenditures charged to ESSER I funds are allowable.

The LEA must upload into the CMT the requested documentation for review to substantiate \$2,010.08 in ESSER I expenditures. Pending the results of the review of the uploaded documentation or if the LEA fails to upload the requested documentation, the LEA may be required to reimburse ESSER I funds with \$2,010.08 using an unrestricted funding source.

7. CA 09: Program Requirements – Coronavirus Relief Fund

LEAs are required to maintain adequate written records to support how CR funds were received, disbursed, and spent, including all records necessary to perform an effective audit. In addition, if the LEA receives under the \$500 per student threshold, the LEA must demonstrate that it expended CR funds during the designated period of availability. Furthermore, if the LEA received funding in excess of the \$500 per student threshold, and availed itself of the flexibility, the LEA must substantiate that the excess funding was spent on allowable activities.

The LEA failed to provide CDE all of the requested documentation to support a sample of expenditures charged to the CR funds. As a result, the LEA is unable to substantiate that \$4,037,998.92 CRF expenditures are allowable.

The LEA must upload into the CMT the requested documentation for review to substantiate \$4,037,998.92 in CR expenditures. Pending the results of the review of the uploaded documentation or if the LEA fails to upload the requested documentation, the LEA may be required to remit to CDE up to \$4,037,998.92 in unsupported CR expenditures using an unrestricted funding source.

8. CA 10: Program Requirements – Governor's Emergency Education Relief Fund

LEAs are required to maintain adequate written records to support how funds were received, disbursed, and spent in the GEER program, including all records necessary to perform an effective audit. In addition, The LEA receiving GEER funds must use those funds for allowable purposed during the period of availability.

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The LEA failed to provide CDE all of the requested documentation to support a sample of expenditures charged to the GEER funds. As a result, the LEA is unable to substantiate that \$308,784.67 in GEER I expenditures are allowable.

The LEA must upload into the CMT the requested documentation for review to substantiate the \$308,784.67 in GEER I expenditures. Pending the results of the review of the uploaded documentation or if the LEA fails to upload the requested documentation, the LEA may be required to reimburse the GEER I funds up to \$308,784.67 using an unrestricted funding source.

9. CA 11: Program Requirements – Elementary and Secondary Emergency Education Relief Fund

LEAs are required to maintain adequate written records to support how funds were received, disbursed, and spent in the ESSER program, including all records necessary to perform an effective audit. Also, the LEA is required to use ESSER I and ESSER II funds for activities authorized by the Elementary and Secondary Education Act of 1965 (ESEA) as amended by the Every Student Succeeds Act of 2015 (ESSA), Individuals with Disabilities Education Act (IDEA), the Adult Education and Family Literacy Act, the Perkins Career and Technical Education (CTE) Act, or the McKinney-Vento Homeless Assistance Act Title VII Part B, and other permissible activities under CARES Act Section 18003 and CRRSA Act Section 313. (CARES Act Section 18003[d], CRRSA Act Section 313[d]). In addition, the LEA is required to use ESSER III funds for activities authorized by the Elementary and Secondary Education Act of 1965 (ESEA) as amended by the Every Student Succeeds Act of 2015 (ESSA), Individuals with Disabilities Education Act (IDEA), the Adult Education and Family Literacy Act, or the Perkins Career and Technical Education (CTE) Act, and other permissible activities under the American Rescue Plan (ARP) Act Section 2001. (ARP Act, Section 2001[e]). Furthermore, the LEA is required to develop and make publicly available a plan for the LEA's use of ESSER III funds. The LEA must engage in meaningful consultation with stakeholders and give the public an opportunity to provide input in the development of this plan. (86 Federal Register 21195) and the LEA is required to develop and make publicly available on the LEA's website, not later than 30 days after receiving the allocation of ESSER III funds, a plan for the safe return to in-person instruction and continuity of services, and must seek public comment on the plan and take such comments into account in the development of the plan. The plan must be updated periodically, but no less frequently than every six months. (ARP Act Section 2001[i], 86 Federal Register 21195) and the LEA is required to reserve not less than 20 percent of ESSER III funds to address learning loss through the implementation of evidence-based interventions ensure that such interventions respond to students' academic, social, and emotional needs and address the disproportionate impact of the coronavirus on low-income students, children with disabilities, English learners, racial and ethnic minorities, the students experiencing homelessness, and children and youth in foster care (ARP Act Section 2001[e][1]).

The LEA failed to provide the CDE all of the requested documentation to support \$8,357,217.74 in expenditures charged to the ESSER funds under review. As a result, the LEA is unable to support that \$2,335,742.20 in expenditures charged to ESSER I, \$3,093,518.55 in expenditures charged to ESSER II, and \$2,927,956.99 in expenditure's charged to the ESSER III are

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allowable. In addition, the LEA failed to post a copy of the safe return to in-person instruction document on the district website; nor, has the LEA updated the document since March 2021.

The LEA must upload into the CMT the requested documentation for review to substantiate that \$2,335,742.20 in expenditures charged to ESSER I, \$3,093,518.55 in expenditures charged to ESSER II, and \$2,927,956.99 in expenditure's charged to ESSER III are allowable. Pending the results of the review of the uploaded documentation or if the LEA fails to upload the requested documentation, the LEA may be required to reimburse ESSER up to \$8,357,217.74 using an unrestricted funding source. Additionally, the LEA must upload evidence to demonstrate that the safe return to in-person instruction document has been updated and is now posted on the LEA website.

Compensatory Education

1. CE 01: Local Educational Agency Parent and Family Engagement

The local governing board of each LEA, or agency, receiving Title I, Part A funding shall establish and implement a written parent and family engagement policy and program. Each LEA receiving Title I, Part A funding shall develop jointly with, agree on with, and distribute to, parents and family members of participating children, a written parent and family engagement policy which shall be incorporated into the LEA level plan, establish the agency's expectations and objectives for meaningful parent and family involvement.

The LEA did not provide evidence that the parent and family engagement policy was annually distributed to parents and family members.

The LEA must submit to the CMT evidence that the parent and family engagement policy has been distributed to parents and family members.

2. CE 02: School Parent and Family Engagement

The governing board of each school district and county office of education shall establish and adopt a written parent and family engagement policy and program for each school in the district that receives funds under Title I, Part A of the Elementary and Secondary Education Act (ESEA), as amended by the ESSA. Each school served under this part shall jointly develop with, and distribute to, parents and family members of participating children a written parent and family engagement policy, agreed upon by such parents, and updated periodically to meet the changing needs of parents and the school. As a component of the school-level parent and family engagement policy, each school served under Title I, Part A shall jointly develop with parents for all children served under this part a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the state's high standards. Additionally, each site must provide records of activities for building capacity for parent and family engagement.

In reviewing the LEA's sample schools, only the school-parent compact and evidence of joint

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development for Helms Middle School (HMS) was submitted. The LEA failed to provide evidence for Richmond High School (RHS), De Anza High School (DAHS), and Lake Elementary School (LES).

The LEA must submit to the CMT school parent and family engagement policies, school-parent compacts, evidence that both were jointly developed with families and were distributed annually, and records for activities for building capacity with community members for RHS, DAHS, and LES. HMS must provide their parent and family engagement policy, evidence both the policy and the compact were distributed annually, and records for building capacity.

3. CE 05: Schoolsite Council Composition

A school that operates a program that requires a School Plan for Student Achievement (SPSA), shall establish a schoolsite council (SSC).

At an elementary school, the SSC shall consist of both of the following groups: (a) The principal of the school or his or her designee; classroom teachers employed at the school, selected by classroom teachers employed at the school; and school personnel employed at the school who are not teachers, selected by school personnel employed at the school who are not teachers. The classroom teachers selected pursuant to this subparagraph shall constitute a majority of the persons selected pursuant to this subparagraph. (b) Parents of pupils attending the school, or other members of the school community, selected by parents of pupils attending the school. The number of persons selected pursuant to this subparagraph shall equal the number of faculty.

At a secondary school, the SSC shall consist of both of the following groups: (a) The principal of the school or his or her designee; classroom teachers employed at the school, selected by classroom teachers employed at the school; and school personnel employed at the school who are not teachers, selected by school personnel employed at the school who are not teachers. The classroom teachers selected pursuant to this subparagraph shall constitute a majority of the persons selected pursuant to this subparagraph. (b) Parents of pupils attending the school, or other members of the school community, selected by parents of pupils attending the school; and pupils attending the school, selected by pupils who are attending the school. The number of persons selected pursuant to this subparagraph shall equal the number of faculty.

The LEA's submitted documents and interviews with each sample school's SSC failed to demonstrate that peers were nominating and electing one another. Additionally, HMS's SSC roster demonstrates the current composition is not compliant.

The LEA must submit to the CMT evidence that teaching staff, non-instructional staff, parents, and students (where applicable) nominated and elected their peers to the schoolsite councils of RHS, DAHS, HMS, and LES. Additionally, the HMS SSC must submit minutes and an updated roster demonstrating parity in composition.

4. CE 06: School Site Activities

An eligible school operating a school wide program shall develop a comprehensive plan, to be consolidated into a single plan, known as the SPSA. The school plan shall be based on a comprehensive needs assessment of the entire school and shall include proposed

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expenditures, based on the projected resource allocation from the governing board or body of the LEA, to address the findings of the needs assessment. The school plan shall be developed with the involvement of parents and other members of the community to be served; individuals who will carry out such plan, including teachers, principals, other school leaders, paraprofessionals present in the school, etc.; if the plan relates to a secondary school, students; and other individuals determined by the school.

In reviewing the evidence submitted by RHS, DAHS and LES, as well as through interviews with each school's schoolsite council members, all three school sites failed to provide evidence that SPSAs were developed with the involvement of parents and other members of the community.

The LEA must submit to the CMT evidence that SSC members participated in the development of the SPSAs for RHS, DAHS, and LES. These records can include agendas, meeting minutes, sign-in sheets, etc.

5. CE 11: Allowable Use of Funds

The LEA must properly charge and document allowable salaries and wages that are reasonable and necessary in accordance with applicable Title I, Part A program requirements and federal accounting requirements.

A review of the LEA's time and effort documentation, procedures, and interviews with sampled employees indicated the LEA did not maintain time and effort documentation in accordance with federal accounting requirements. The sample included: Mari Santos Santiago, Rosa Rivera, Christine Fonseca, Wendy Forrest Douthett, Brenda Rankin, Rachel Porzig, Raquel Flores, William Swift and Diana Sanchez Anaya.

The LEA must submit to the CMT journal entries showing the reversal of the sampled employees' salary and benefits charged to Title I, Part A for the 2021-2022 school year. Furthermore, the LEA must upload evidence of federally compliant time and effort records for April 2022 for employees sampled during the monitoring review.

6. CE 13: Comparability of Services

The LEA shall have written assurances/policies showing comparability of services across district schools. The LEA shall provide completed LEA comparability of services calculation forms with data. Any LEA with more than one school in a grade span must meet comparability of services requirements, including LEAs with schools in only one Grade Span Group.

The LEA failed to provide comparability of services calculation forms.

The LEA must submit into the CMT completed comparability of services calculation forms. Templates for both forms have been added to the reviews resources section in the CMT.

Career Technical Education

1. CTE 03: Programmatic Requirements: High Quality CTE Program

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The Perkins Act is based on the Federal Perkins V State Plan and the California State Plan for CTE which require that LEAs meet all of the requirements of a high quality CTE program, including: (1) pathways that are a coherent, non-duplicative sequence of courses that (2a) cover all of the CTE Model Curriculum Standards of the pathway and in which (2b) each course spends at least 50 percent of its time on the CTE Model Curriculum Standards of that pathway, and that (3) meet the leadership requirement.

Evidence reviewed for WCCUSD's CTE program do not meet requirements in that: (1) some pathways in sectors at some sites are not coherent sequences of courses in that they have split points other than after the first year of a three-year or longer sequence, which is only allowed in pathways in the Health Science and Medical Technology sector. In the case that there is a split point in a pathway, there must be two years' (20 credits or 300hrs) of coursework after the split point and each of the pathways after the split point that shares the introductory course must be in the same industry sector. Further, some pathways at some sites allow students to progress to higher levels of the pathway without having completed the prerequisite coursework, e.g., ninth graders in a capstone course. (2) Not all course outlines uploaded by the LEA are formatted in a way that can show coverage of and alignment to CTE Model Curriculum Standards, and therefore cannot be used to bolster the (1) coherent sequencing of the pathway, nor be used to show that (2a) the pathway as a whole covers all of the CTE Model Curriculum Standards of a single pathway and that (2b) each course in the sequence spends at least 50 percent of its time on those standards. Finally, (3) all pathways at WCCUSD are attempting to meet the leadership requirement through alternate means rather than affiliating with one of the six California-approved Career Technical Student Organizations (CTSOs), but some pathways are missing some required elements to do so. For example pathways meeting the leadership requirement must show that (3a) the specific teaching of leadership skills is embedded in the every day curriculum, that (3b) there is a student club centered around the topic of the pathway with a hierarchical leadership structure registered with the Associated Student Body (ASB), and (3c) students build a portfolio over the course of the year and present a portfolio defense in front of an authentic audience towards the end of the year. The formatting of WCCUSD course outlines do not show alignment to the Standards for Career Ready Practice and thus cannot be used to meet evidentiary requirements for (3a). It's not clear that all pathways have a student club that meets the requirements of (3b). Twelfth grade students, as a matter of district policy, have a "senior defense" in front of an authentic audience which meets the requirements of (3c), but not all pathways have equivalent activities that approximate this for CTE participants in ninth through eleventh grade.

To resolve this finding, WCCUSD must upload to the CMT within 45 calendar days of this report a written plan that describes their plan to resolve the findings. By dates to be proposed and agreed upon using the comments section but not to exceed 225 calendar days from this report, WCCUSD will upload evidence to the CMT evidence that these plans have been carried out. The plan should include (1) the process by which WCCUSD will coordinate among site staff to correct the sequencing errors, and describe their planned solutions in the form of an updated flowchart of course sequences of each pathway of each site showing any options, choices, or split points available to students of those pathways; (2) describe the common format for course outlines that can show alignment to CTE Model Curriculum Standards such that any independent reader can, at a glance, conclude that the pathways pass the tests described by (2a) and (2b), and describe the process and dates CTE teachers will complete the new course outlines; finally describe how each pathway will meet each of the three parts of the leadership requirement through alternate means (3a-3c) for all grade levels of CTE participants. The due

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dates for the proof of execution each step of the plan can have different due dates, not to exceed 225 calendar days from the date of this report. Use the comments section of CMT to propose those dates by activity.

Education Equity

1. EE 01: Prohibition of Discrimination, Harassment, Intimidation, and Bullying

The LEA shall have a policy that prohibits discrimination, harassment, intimidation, and bullying based on actual or perceived ancestry, color, disability, gender, gender identity, gender expression, immigration status, nationality, race or ethnicity, religion, sex, sexual orientation, or association with a person or a group with one or more of these actual or perceived characteristics. The policy shall include a statement that it applies to all acts related to school activity or school attendance within a school under the jurisdiction of the superintendent of the school district. The LEA must publicize adopted policies that prohibit discrimination, harassment, intimidation, and bullying, including information about the manner in which to file a complaint, to pupils, parents/guardians, employees, the governing board, and the general public. The information shall be translated pursuant to EC section 48985. LEAs shall also include a notice of nondiscrimination policies in any publications used in connection with the recruitment of pupils or employees. The LEA must identify the officer responsible for nondiscrimination and education equity compliance in such publicity. If 15 percent or more of the pupils enrolled in a public school that provides instruction in kindergarten or any of grades 1 to 12, inclusive, speak a single primary language other than English, all notices, reports, statements, and records sent to the parent/guardian of any such pupil by the LEA shall, in addition to being written in English, be written in the primary language, and may be responded to in either English or primary language. The LEA shall identify a responsible LEA officer for ensuring compliance with nondiscrimination in educational equity.

Based on the inability to review the 2021-2022 handbooks, annual notifications and various other documents, the Agency is missing a complete nondiscrimination statement on previously disseminated publications and materials, did not include the student nondiscrimination policy in its publications and, did not provide other materials such as flyers posters and brochures for review under this section so that compliance could be fully assessed. Additionally, the Agency does not have translated compliant policies or processes not posted the required links to policies and resources on its web site.

The Agency must upload: (1) District level and School Site Level Handbooks for Parent and Students, Annual Notifications for Parents and Guardians, which include: (a) a complete nondiscrimination statement with the required protected group characteristics and contact information for the Equity Officer(s), Title IX Compliance Officer(s) and 504 Coordinator(s), (b) board policy for students as it pertains to nondiscrimination, which is 5145.3 (based on the numbering of the vendor the Agency uses); (2) Use the addenda process - to amend handbooks, and course catalogs et cetera - must be disseminated to parents and students of the Agency. Proof of dissemination must be provided in order to resolve this finding; (3) Any posters, flyers, brochures or, similar documents so that, a full evaluation of compliance may be conducted. If the Agency does not use those types for documents, please provide a statement on Agency letterhead, signed by the Superintendent stating this information. If the Agency uploads documents listed and, the documents are found to not compliant, please use the

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addenda process to amend the documents. Proof of dissemination is required to clear the finding; and, (4) Create a nondiscrimination statement which follows the legal requirements under this section. The statement must be composed to be used in the required areas as indicated under the legal requirements of this section.

2. EE 02: Prohibition of Sexual Harassment

The LEA shall have a written policy on sexual harassment, which shall include information on where to obtain the specific rules and procedures for reporting charges of sexual harassment and for pursuing available remedies. An LEA should include its sexual harassment policy as part of its general nondiscrimination policies, rather than distributing it as a separate written document. A copy of the written policy on sexual harassment shall be displayed in a prominent location in the main administrative building or other area of the campus or school site. "Prominent location" means that location, or those locations, in the main administrative building or other area where notices regarding the LEA's rules, regulations, procedures, and standards of conduct are posted. The LEA shall provide a copy of the written policy to all pupils as part of any orientation program conducted for new and continuing pupils at the beginning of each quarter, semester, or summer session, as applicable. A copy of the LEA's written policy on sexual harassment shall be provided to each faculty member, all members of the administrative staff, and all members of the support staff at the beginning of the first quarter or semester of the school year, or at the time that there is a new employee hired. A copy of the LEA's policy shall appear in any publication that sets forth the comprehensive rules, regulations, procedures, and standards for conduct for the LEA.

Based on a review of student and employee documents, the Agency has not provided the student sexual harassment board policy and student sexual harassment, as it pertains to Title IX, complaint procedures to students and employees.

The Agency must upload: (1) Publicized Materials- i.e. - student/parent/district/ school site/athletic/employee handbooks, annual notifications- to include: (a) a complete nondiscrimination statement with the required protected group characteristics and contact information for the Equity Officer(s), Title IX Compliance Officer(s) and Section 504 designee, (b) Board Policy 5145.7 and Board Policy 5145.7; (2) All posters, flyers, brochures or, similar documents, so that a full evaluation of compliance may be conducted. If the Agency does not use those types for documents, please provide a statement on Agency letterhead, signed by the Superintendent stating this information, and, (3) Proof of training provided to those administrators and staff in supporting roles of the Title IX Final Rule Decision.

3. EE 03: Suicide Prevention and Pupil Safety

The governing board or body of a LEA that serves pupils in grades 7 to 12, inclusive, shall, before the beginning of the 2017–18 school year, adopt, at a regularly scheduled meeting, a policy on pupil suicide prevention in grades 7 to 12, inclusive. The policy shall be developed in consultation with school and community stakeholders, school-employed mental health professionals, and suicide prevention experts and shall, at a minimum, address procedures relating to suicide prevention, intervention, and postvention. The LEA's policy on pupil suicide prevention in grades 7-12, inclusive, shall be readily accessible in a prominent location on the LEA's existing internet website in a manner that is easily accessible to parents/guardians and

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pupils. The governing board or body of a LEA that serves pupils in kindergarten and grades 1 to 6, inclusive, shall, before the beginning of the 2020-21 school year, adopt, at a regularly scheduled meeting, a policy on pupil suicide prevention in kindergarten and grades 1 to 6 inclusive. The policy shall be developed in consultation with school and community stakeholders, the county mental health plan, school-employed mental health professional, and suicide prevention experts and shall, at a minimum, address procedures for related to suicide prevention, intervention, and postvention. The policy for pupils in kindergarten and grades 1 to 6, inclusive, shall be age appropriate and shall be delivered and discussed in a manner that is sensitive to the needs of young pupils. The policy for pupils in kindergarten and grades 1 to 6, inclusive, shall be written to ensure proper coordination and consultation with the county mental health plan if a referral is made for mental health or related services on behalf of a pupil who is a Medi-Cal beneficiary. The LEA's policy on pupil suicide prevention in kindergarten and grades 1 to 6, inclusive, shall be readily accessible in a prominent location on the LEA's existing internet website in a manner that is easily accessible to parents/guardians and pupils and include a reference to the age appropriateness of the policy. The policy shall specifically address the needs of high-risk groups, including, but not limited to, all of the following: (a) Youth bereaved by suicide. (b) Youth with disabilities, mental illness, or substance use disorders. (c) Youth experiencing homelessness or in out-of-home settings, such as foster care. (d) Lesbian, gay, bisexual, transgender, or questioning (LGBTQ) youth. The policy shall be written to ensure that a school employee acts only within the authorization and scope of the employee's credential or license. Nothing in this section shall be construed as authorizing or encouraging a school employee to diagnose or treat mental illness unless the employee is specifically licensed and employed to do so. The policy shall also address any training to be provided to teachers of pupils in all of the grades served by the LEA; (a) Materials approved by a LEA for training shall include how to identify appropriate mental health services, both at the school site and within the larger community, and when and how to refer youth and their families to those services, and,

(b) Materials approved for training may also include programs that can be completed through self-review of suitable suicide prevention materials.

Based on a review of the Agency's governing board policies, the Agency does not have compliant pupil suicide prevention board policy for 7th - 12th grade students nor, an age appropriate suicide prevention board policy for kindergarten through 6th grade.

The Agency must upload: (1) An adopted board policy for 9th through 12th grade students pertaining to suicide prevention which conforms to the legal requirements under this section, and, (2) An adopted board policy, which has been written at an age appropriate policy for kindergarten through the 6th grade. The Agency may choose to adopt an exhibit, which must be adopted in concert with the 7th - 12th grade board policy.

4. EE 04: Title IX Coordinator(s) and Notification

Every LEA must designate and authorize at least one employee to coordinate its efforts to comply with its responsibilities under Title IX. The employee must be referred to as the "Title IX Coordinator." (a) The LEA must notify applicants for admission and employment, students, parents or legal guardians of elementary and secondary school students, employees, and all unions or professional organizations holding collective bargaining or professional agreements with the recipient, of the name or title, office address, electronic mail address, and telephone

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number of the employee or employees designated as the Title IX Coordinator. (b) Any person may report sex discrimination, including sexual harassment (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex discrimination or sexual harassment), in person, by mail, by telephone, or by electronic mail, using the contact information listed for the Title IX Coordinator, or by any other means that results in the Title IX Coordinator receiving the person's verbal or written report. Such a report may be made at any time (including during non-business hours) by using the telephone number or electronic mail address, or by mail to the office address, listed for the Title IX Coordinator. The LEA must notify applicants for admission and employment, pupils, parents or legal guardians of elementary and secondary school students, employees, and all unions or professional organizations holding collective bargaining or professional agreements with the LEA that it does not discriminate on the basis of sex in the education program or activity it operates and that it is required by Title IX to not discriminate in such a manner. (a) Such notification must state that the requirement not to discriminate in the education program or activity extends to admission and employment, and that inquiries about the application of Title IX to the LEA may be referred to the LEA's Title IX Coordinator. The LEA must prominently display the contact information required to be listed for the Title IX Coordinator and the policy on its website, if any, and in each handbook or catalog that it makes available to persons entitled to a notification. (a) The LEA must not use or distribute a publication stating that the LEA treats applicants, pupils, or employees differently on the basis of sex as such treatment is permitted by Title IX. The LEA shall post the following Title IX requirements in a prominent and conspicuous location on the LEA's existing webpage: (a) The name and contact information of the Title IX coordinator that public school, school district, county office of education, or charter school which shall include the Title IX coordinator's phone number and email address. (b) The rights of a pupil and the public and the responsibilities of public school, school district, county office of education, or charter school under Title IX, which shall include, but shall not be limited to, Internet Web links to information about those rights and responsibilities located on the Internet web sites of the department's Office for Equal Opportunity and the U.S. Department of Education (ED) Office of Civil Rights (OCR), and the list of rights specified in EC Section 221.8. (c) A description of how to file a complaint under Title IX, which must include all of the following: i. An explanation of the statute of limitations within which a complaint must be filed after an alleged incident of discrimination has occurred, and how a complaint may be filed beyond the statute of limitations. ii. An explanation of how the complaint will be investigated and how the complainant may further pursue the complaint, including, but not limited to, Internet Web links to this information on the U.S. ED OCR's internet web site. iii. An Internet web link to the U.S. ED OCR complaints form, and the contact information for the office, which shall include the phone number and email address for the office. The LEA shall post a link the CDE's Title IX information in a prominent location on the LEA's existing internet website in a manner that is easily accessible to parents/guardians and pupils.

Based on a review of the documentation, the Agency has not shown compliance with Title IX complaint procedures and Title IX Final Rule Decision training for all staff and administrators in supporting roles.

The Agency must upload: (1) Publicized Materials- i.e. - student/parent/district/ school site/athletic/employee handbooks, annual notifications- to include: (a) a complete nondiscrimination statement with the required protected group characteristics and contact information for the Equity Officer(s), Title IX Compliance Officer(s) and Section 504 designee, (b) Board Policy 5145.71; (2) All posters, flyers, brochures or, similar documents so that, a full evaluation of compliance may be conducted. If the Agency does not use those types for

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documents, please provide a statement on Agency letterhead, signed by the Superintendent stating this information, and, (3) Proof of training provided to those administrators and staff in supporting roles of the Title IX Final Rule Decision.

5. EE 05: Section 504 Complaint Procedures

The LEA must adopt and publish a complaint procedure providing for prompt and equitable resolution of student and employee complaints alleging any discrimination based on sex or disability.

Based upon a review of documentation, the Agency does not have a current board policy for Section 504 grievance/complaint procedures and, publications and other materials provided to students, parents/guardians, and employees, which include the Section 504 grievance/complaint procedures. The Agency has not shown compliance in publicizing the contact information for the designated Section 504 in its publications and materials.

The Agency must upload: (1) A revised -and adopted- Board Policy 6164.6, which includes all of the current provisions and grievance procedures under Section 504; (2) Proof that the revised Board Policy 6164.6 has been disseminated to: (a) Students, (b) Parents & Guardians and, (c) Employees. Clear proof of dissemination must be provided in order to resolve the finding; and, (3) Current year handbooks and annual notifications provided to: (a) Students, (b) Parents & Guardians with a complete nondiscrimination statement, which includes the contact information for the 504 Coordinator(s) and, the Section 504 Complaint Board Policy. Proof of dissemination must be provided in order to resolve the finding.

6. EE 06: Marital, Parental, and Pregnancy Status

The LEA shall notify pregnant and parenting pupils of their rights and options available under the law through the annual school year welcome packets and through independent study packets. The LEA shall also annually notify parents/guardians of pupils at the beginning of the regular school term of the rights and options available to pregnant and parenting pupils under the law.

Based upon a review of documentation, the Agency does not have publications and other materials related to the rights and options offered provided to pregnant and parenting students, and the Agency is not currently utilizing independent student packets and welcome packets for pregnant and parenting students.

The Agency must upload evidence of the following: (1) Provide -all Parents and Guardians of the Agency- with the rights and options under Board Policy 5146. Proof of dissemination must be provided in order to resolve the finding; (2) Provide -all Pregnant and Parenting students- the rights and options under Board Policy 5146. Proof of dissemination must be provided in order to resolve the finding; and, (3) Created Independent Study Packets and Welcome Packets which contain the rights and options for pregnant and parenting students.

7. EE 07: Immigration and Citizenship

School officials and employees of an LEA shall not collect information or documents regarding

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citizenship or immigration status of pupils and their family members, except as required by law or required to administer a state or federally supported educational program. The LEA shall report to the responsible governing board in a timely manner any requests for information or access to a school site by an officer or employee of a law enforcement agency for the purpose of enforcing the immigration laws in a manner that ensures confidentiality and privacy of any potentially identifying information. If an employee of a school is aware that a pupil's parent or guardian is not available to care for the pupil, the school shall first exhaust any parental instruction relating to the pupil's care in the emergency contact information it has for the pupil to arrange for the pupil's care. A school is encouraged to work with parents or guardians to update the emergency contact information and not to contact Child Protective Services to arrange for the pupil's care unless the school is unable to arrange for care through the use of emergency contact information or other information or instructions provided by the parent or guardian. The LEA's governing board shall do both of the following: a) Provide information to parents and guardians, as appropriate, regarding their children's right to a free public education, regardless of immigration status or religious beliefs. This information shall include information relating to "know your rights" immigration enforcement established by the Attorney General and may be provided in the annual notification to parents and guardians pursuant to EC Section 48980 or any other cost-effective means determined by the LEA, b) Educate pupils about the negative impact of bullying other pupils based on their actual or perceived immigration status or their religious beliefs and customs. All LEAs shall adopt policies based on the model policies developed by the Attorney General's Office (Guidance), or equivalent policies.

Based on the information provided, students and employees have not received training specific to the information on the California Attorney General's Guidance and, Parents and Guardians have not received the Annual Notification opt out notices nor, the "Know Your Educational Rights" information.

The Agency must upload evidence of the following: (1) Proof of training all students of the Agency on the antiharassment and antibullying specific to the information on page 38 of the California Attorney General's Guidance; (2) A copy of the training provided to students of the Agency, which includes the dates, times and locations where the training was provided to all students. Proof of training must be submitted in order to resolve the finding; (3) Proof of training all employees of the Agency on the antiharassment and antibullying specific to the information on page 38 of the California Attorney General's Guidance; (4) A copy of the training provided to employees of the Agency, which includes the dates, times and locations where the training was provided to all employees. Proof of training must be submitted in order to resolve the finding; and, (5) Provide parents and guardians with an opt out notice from the student directory which includes the reasons and timeline for the opt out of the Agency's directory and, proof of dissemination of the opt out information must be provided in order to resolve the finding.

8. EE 08: Curriculum Instruction and Counseling Materials

LEAs shall not discriminate against any pupil based on actual or perceived sex, sexual orientation, gender, ethnic group identification, race, ancestry, national origin, religion, color, or mental or physical disability in the counseling or guidance of pupils. An LEA that uses testing or other materials for appraising or counseling pupils shall not use different materials for pupils on the basis of sex, sexual orientation, gender, ethnic group identification, race, ancestry, national origin, religion, color, or mental or physical disability unless such different materials cover the

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same occupations and interest areas and the use of such different materials is essential to the elimination of bias and discrimination.

Based on the inability to review counseling materials and documents, as no guidance counseling materials were provided for review, the Agency has not shown that students are provided equitable materials nor materials that contain a complete nondiscrimination statement nor, a process for the master course schedule. Additionally, it is not clear as to whether or not current year high school student have received a course catalog and, no course announcements were provided for Elementary and Middle School Students.

The Agency must upload evidence of the following: (1) Academic, Career, and Guidance Counseling Materials, which are materials provided to students related to academic, career, and guidance counseling for the selected school sites selected under this review, (2) Confirmation statement that the 2021-2022 High School Catalogs have been provided to all high school students; (3) Course Announcements for Elementary and Middle School students and, (4) Master Scheduling Process statement which explains the scheduling for process for male and female students. If any of the documents -in numbers 1 through 3- do not contain the required information, the Agency must use the addenda process to amend the current academic year course announcements /catalog or publications for all three high school sites to include a complete nondiscrimination statement and the contact information for the: (a) Title IX Coordinator(s), (b) Equity Compliance Officer and, (c) 504 Coordinator(s) contact information. The addenda must be provided to parents and students of the Agency and clear proof of dissemination must be provided in order to resolve the finding.

9. EE 09: Pupil Activities, Clubs and Programs

An LEA shall not provide or otherwise carry out any of its extracurricular or activities separately, or require or refuse participation therein by any of its pupils on the basis of sex, sexual orientation, gender, ethnic group identification, race, ancestry, national origin, religion, color, or mental or physical disability. A pupil shall be permitted to participate in sex-segregated school programs and activities and use facilities consistent with his or her gender identity, irrespective of the gender listed on the pupil's records.

Based on an inability to review documents, the Agency does not have a policy and/or procedure outlining the provisions and accommodations for transgender and gender nonconforming pupils. The Agency has not shown that students are provided materials that contain a complete nondiscrimination statement with the required designees.

The Agency must upload evidence of the following: (1) Activities, Clubs, and Program Materials which show all extra-curricular and, co-curricular programs are available students and, (2) Policy and/or procedure outlining the provisions and accommodations for transgender and gender nonconforming pupils.

10. EE 10: Athletics

No person shall on the basis of sex, sexual orientation, gender, ethnic group identification, race, ancestry, national origin, religion, color or mental or physical disability be excluded from participation in, be denied the benefits of, be denied equivalent opportunity in, or otherwise

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discriminated against in interscholastic, intramural, or club athletics. The LEA shall not, on the basis of sex, exclude from participation in, or deny equivalent opportunity in, athletic programs. In determining whether equivalent opportunities are available to both sexes in athletic programs, the factors an LEA shall consider, include, but are not limited to:

(a) Whether the selection of sports and levels of competition offered effectively accommodate the interests and abilities of both sexes; (b) The provision and maintenance of equipment and supplies;

(c) Scheduling of games and practice times; selection of the season for a sport; location of the games and practices; (d) Travel and per diem allowances; (e) Opportunities to receive coaching and academic tutoring; (f) Assignment and compensation of coaches and tutors; (g) Provision of locker rooms, practice and competitive facilities; (h) Provision of medical and training facilities and services; (i) Provision of housing and dining facilities and services; and, (j) Publicity.

Based on a review of the documentation, the Agency has not shown compliance with athletics program availability for all students.

The Agency must upload evidence of the following: (1) Updated screenshots with show that all the selected school sites have the required athletic data and nondiscrimination statement on the athletics websites for the selected school sites; (2) Aerial school site maps with the counts and explanations of perceived disparities for the selected school sites athletics facilities; (3) Expenditures for the 2020 - 2021 school year for the selected school sites, using the "Submission of Athletic Expenditures" format and, (4) Athletic Recruitment Materials used at the selected school sites.

English Learner

1. EL 01: English Learner Advisory Committee (ELAC)

A school site with 21 or more English learners (ELs) must have a functioning ELAC that meets the following requirements:

(a) Parent members are elected by parents or guardians of ELs. (b) Parents of ELs constitute at least the same percentage of the committee membership as their children represent of the student body. The ELAC shall be responsible for assisting in the development of the schoolwide needs assessment and ways to make parents aware of the importance of regular school attendance. The ELAC shall advise the principal and staff in the development of a site plan for ELs and submit the plan to the school site council for consideration for inclusion in the SPSA. The ELAC receives training materials and training, planned in full consultation with committee members, to assist members in carrying out their legal responsibilities. A school may designate an existing school-level advisory committee, or subcommittee of such advisory committee, to fulfill the legal responsibilities of ELAC, if the advisory body meets the criteria in paragraph "b", above. Each ELAC has the opportunity to elect at least one member to the District English Learner Advisory Committee (DELAC) or participants in a proportionate regional representation scheme when there are 31 or more ELACs in the LEA.

A review of documentation, including ELAC ballots, sign-in sheets, meeting agendas and

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minutes, tracking documents from the LEA, and interviews with parents, demonstrated that while the LEA has provided sites with standardized ELAC forms, and has a system to track ELAC progress at school sites, both RHS and DHS do not have functioning ELACs. While a roster of members was provided for DAHS for the 2021-22 school year, election evidence, meeting minutes and sign-in sheets were not provided, therefore it could not be verified that this site completed all ELAC tasks. A 2020-21 ELAC roster was provided for RHS but there was no evidence provided to demonstrate that RHS has a functioning ELAC in the 2021-22 school year.

WCCUSD must provide evidence into the CMT for DAHS and RHS as follows:

1. Evidence, including presentation materials and sign-in sheets, to demonstrate that site administrators have been trained on the intent, purpose and legal responsibilities of ELAC.
2. Evidence that all EL parents at DAHS and RHS were notified of how to participate in ELAC elections. Evidence may include, but is not limited to, election announcements and a record of the recipients of the announcements, nomination forms, ballots, voting rosters, etc.
3. Up-to-date ELAC rosters of elected members for DAHS and RHS that include the English language acquisition status (English Learner [EL], English Only [EO], Initial Fluent English Proficient [IFEP], Reclassified to Fluent English Proficient [RFEP]) of their children.
4. Evidence, including but not limited to, presentation materials, meeting minutes, and attendance records, to demonstrate that elected ELAC members at DAHS and RHS have received training to assist members in carrying out their legal responsibilities.
5. Evidence to demonstrate the completion of all ELAC advisory tasks and requirements listed above, with sufficient EL parents present. Evidence must include meeting agendas, meeting minutes, and attendance records from future ELAC meetings held after March 2022.

2. EL 02: District English Learner Advisory Committee (DELAC)

Each LEA with 51 or more ELs must form a DELAC unless the district designates for this purpose a subcommittee of an existing districtwide advisory committee. Parents or guardians, or both, of pupils of limited English proficiency who are not employed by the district shall constitute a majority of the DELAC. The DELAC shall advise the school district governing board on all of the following tasks: (a) Development of an LEA master plan, including policies, per the SBE EL Roadmap Policy, guiding consistent implementation of EL educational programs and services, that takes into consideration the SPSAs. (b) Conducting of an LEA-wide needs assessment on a school-by-school basis. (c) Establishment of LEA program, goals, and objectives for programs and services for ELs per the SBE adopted EL Roadmap Policy. (d) Development of a plan to ensure compliance with any applicable teacher and instructional aide requirements. (e) Review and comment on the LEA's reclassification procedures. (f) Review and comment on the written notifications required to be sent to parents and guardians. (g) Under the local control funding formula, LEAs with at least 50 ELs and whose total enrollment includes at least 15 percent ELs must establish a DELAC, and that DELAC must carry out specific responsibilities related to the Local Control and Accountability Plan (LCAP), including providing input regarding the LEA's existing language acquisition programs and language programs, and, where possible, the establishment of other such programs. If the DELAC acts as the ELAC under EC sections

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52063(b)(1) and 52062(a)(2), the DELAC shall also review and comment on the development or annual update of the LCAP. Each LEA must provide appropriate training materials and training, planned in full consultation with committee members, to assist members in carrying out their legal advisory responsibilities. The consolidated application must also include certifications by appropriate district advisory committees, including the DELAC, that the application was developed with review and advice of those committees.

A review of documentation, including meeting minutes, rosters, sign-in sheets, and interviews with parents, demonstrated that not all eligible school sites in the LEA had formed ELACs, and therefore, the DELAC roster has not been fully established. As a result, some DELAC requirements have not been met. Specifically, the DELAC has not conducted a district-wide needs assessment on a school-by-school basis, and the DELAC has not provided input on the LEA's master plan and policies guiding consistent implementation of EL educational programs and services, taking into consideration the SPSAs. Interviews with parent members of DELAC confirmed this information.

WCCUSD must provide the following documentation into the CMT:

1. A complete roster of DELAC members that includes the English language acquisition status (EL, EO, IFEP, RFEP) of their children who attend WCCUSD schools, and the school site each member represents.
2. Evidence, including but not limited to, presentation materials, meeting minutes, and attendance records, to demonstrate that, once a complete roster has been formed, all DELAC members have received training to assist members in carrying out their legal responsibilities.
3. Evidence of the completion of all DELAC required advisory tasks, with sufficient DELAC parent members present. Evidence must include meeting agendas, meeting minutes, and attendance records from future DELAC meetings held after March 2022.

3. EL 03: EL Identification and Assessment

Each LEA must properly identify and assess all students who have a home language other than English. At or before the time of a student's initial California enrollment, an LEA shall conduct, in writing, a home language survey (HLS) to identify whether the primary or native language of the student is a language other than English. If a parent or guardian HLS response indicates a primary or native language other than English, and the LEA determines the student is eligible for initial assessment, the LEA shall promptly notify the parent or guardian, in writing, prior to the administration of the English Language Proficiency Assessments for California (ELPAC) initial assessment. The LEA shall administer the ELPAC initial assessment to each student eligible for the initial assessment, locally produce the official score in accordance with the directions of the test contractor, and notify the parent or guardian, in writing, of the results of the initial assessment within 30 calendar days after the student's initial date of California enrollment. Each LEA must annually assess the English language proficiency (ELP) and academic progress of each EL. An LEA shall administer the ELPAC summative assessment during the annual summative assessment window. When administering an initial or summative ELPAC assessment to a pupil with a disability, the LEA shall provide designated supports or accommodations, in accordance with the pupil's individualized education program (IEP) or

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Section 504 plan. When a pupil's IEP or Section 504 plan specifies that the pupil has a disability that precludes assessment such that there are no appropriate accommodations for assessment in one or more of the domains (listening, speaking, reading, and writing), the pupil shall be assessed in the remaining domains in which it is possible to assess the pupil. When a pupil's IEP team determines that the pupil has a significant cognitive disability such that the pupil is unable to participate in the initial or summative assessment, or a section of either test, even with resources, the pupil shall be assessed as specified in the pupil's IEP.

A review of documentation, including home language surveys, EL student assessment data, LEA policies and procedures for initial EL identification, and sample EL IEPs, demonstrated missing or out-of-date ELP assessment results from the 2021 Summative ELPAC administration for approximately 2024 EL students. In addition, the LEA did not provide state or local academic assessment scores in English language arts (ELA) or math for any enrolled EL student. Finally, the LEA's policies and procedures for initial identification of ELs was in draft form, and sampled EL IEPs did not have consistent documentation to support whether students received designated supports and accommodations during ELPAC administration.

WCCUSD must submit evidence into the CMT as follows:

1. Identify and explain why each identified student above did not have 2021 Summative ELPAC results. WCCUSD must include attempts made by the district to test each EL student.
2. A sortable spreadsheet containing recent state or local academic assessment scores in ELA and math for each enrolled EL student.
3. The final, board-approved EL Master Plan containing up-to-date policies and procedures for EL identification and assessment.
4. Training to special education staff regarding the inclusion of annual language proficiency levels and whether a student receives designated supports or accommodations when being administered the ELPAC, as a consideration of the language needs of ELs with disabilities. Evidence must include agendas, attendance records, and meeting minutes from the training.
5. Missing pages to IEPs or addendums to IEPs for students whose IEPs were found to be incomplete:
 - a. DAHS IEP dated 11/9/2021.
 - b. HMS IEP dated 11/9/2020.
 - c. LES IEP dated 10/6/2021. In addition, WCCUSD must provide an additional redacted EL IEP from LES with all required EL components.

4. EL 06: Title III Inventory

For all categorical programs, each LEA must maintain a historical inventory record for each

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piece of equipment with an acquisition cost of more than \$500 per unit that is purchased with Title III funds. The record must describe the acquisition by: (a) Type/description; (b) Model/name; (c) Serial/identification number; (d) Funding source; (e) Acquisition date; (f) Original Cost; (g) Location and use; (h) Percentage of Federal participation in the project costs for the Federal award under which the property was acquired; (i) Title holder; (j) Current condition; and (k) Transfer, replacement, or disposition of obsolete or unusable equipment. Capital expenditures for special purpose equipment are allowable as direct costs, provided that items with a unit cost of \$5,000 or more have the prior written approval of the Federal awarding agency or pass-through entity. Equipment purchased with a fair market value in excess of \$5,000 may be retained, sold, or disposed of with written approval of the Federal awarding agency or pass-through entity. Equipment with a current fair market value of \$5,000 or less may be retained, sold, or otherwise disposed of with no further obligation to the Federal awarding agency or pass-through entity. Each LEA must have conducted a physical check of the inventory of equipment within the past two years and reconciled the results with inventory records.

The LEA provided an inventory list that did not contain all required information as described above. Specifically, the LEA did not provide information about the use of equipment purchases, and the LEA did not provide evidence that a physical check had been conducted within the past two years.

WCCUSD must submit into the CMT a description of the use of equipment on the Title III inventory list, and a record of the last physical check of items.

5. EL 07: Supplement, Not Supplant with Title III

General fund resources must be used to provide services and programs for ELs, including English language development (ELD) and access to the standard instructional program. The provision of such services and programs must not be contingent on the receipt of state or federal supplementary funds. Each LEA must use Title III funds only to supplement, not supplant federal, state, and local public funds that, in the absence of such availability, would have been expended for programs for ELs and immigrant children and youth and in no case to supplant such federal, state, and local public funds. The LEA shall ensure that costs charged to the program(s) under Title III are reasonable, necessary, and allocable in accordance with applicable statutes, regulations, and program plan(s). Each LEA must use no less than 98 percent of Title III EL apportionments on direct services to ELs and may not use more than 2 percent of such funds for the cost of administration of this program for a fiscal year.

The LEA has not provided all required documentation to demonstrate that it has followed all above requirements for the use of Title III funds in 2020-21 and 2021-22, including utilizing no less than 98 percent of Title III funds on direct services to EL students. Specifically, the LEA has not provided requested justifications for sampled expenditures related to Title III allowability measures. In addition, the LEA did not provide payroll records nor did the LEA provide sufficient documentation of allowable duties and time and effort for the five sampled employees whose salaries and benefits, whether in whole or in part or for extra time, were charged to Title III. Therefore, costs could not be determined as necessary, reasonable and allocable. Additionally, there was evidence of unauthorized duties and activities performed by staff, identified in documentation and staff interviews, such as yard duty, ELAC and DELAC activities, COVID support, ELD placement, and core curriculum piloting and adoption.

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WCCUSD must submit into the CMT all documentation as follows:

1. Journal entries demonstrating reimbursement to the Title III program from an unrestricted funding source for the 2021-22 school year for the full salary and benefits for the five sampled employees.
2. Updated individual duty statements describing responsibilities and activities delineated by funding source for the five sampled employees.
3. A written justification for each expenditure below to describe how each purchase is supplemental and meets the intent and purpose of the Title III program to which it was charged:

1. 10/6/20 AP100620 CALIFORNIA ASSESSMENT CONFERENCE \$198.00
2. 12/15/20 AP121520 SAGE-INVOICE 503142KI \$229.35
3. 3/2/21 AP030221 CAPSTONE CLASSROOM \$140,260.61
4. 10/11/21 686919 SADDLEBACK EDUCATIONAL, INC. \$48,753.20
5. 10/13/21 7386487 HEINEMANN COMPANY \$2,402.44
6. 12/17/21 7425 ELLEVATION INC \$25,000.56.

Upon submission of the requested information above, additional actions may be taken, including requests for additional documentation and possible reversal of funds.

6. EL 10: Reclassification

Each LEA must reclassify a student from EL to proficient in English by using a process and criteria that includes, but is not limited to the following: (a) Assessment of ELP. (b) Teacher evaluation that includes, but is not limited to, the student's academic performance. The term "teacher" refers to the classroom teacher and other certificated staff with direct responsibility for teaching or placement decisions of the student. (c) Opportunities for parent opinion, consultation, and involvement during the reclassification process. (d) Comparison of student's performance in basic skills against an empirically established range of performance in basic skills, based upon the performance of English proficient students of the same age, which demonstrates whether the student is sufficiently proficient in English to participate effectively in a curriculum designed for students of the same age whose native language is English. Regardless of the physical form of such record and to ensure transfer of documentation, each LEA must maintain the following in the student's permanent record: (a) Language and academic performance assessments; (b) Participants in the reclassification process; and (c) Any decisions regarding reclassification. Each LEA must monitor the progress of reclassified pupils for a minimum of four years to ensure correct classification, placement, and additional academic support, as needed.

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The LEA did not provide evidence that it has reclassified students according to state guidelines and local reclassification criteria and procedures. Specifically, data submitted by the LEA demonstrated approximately 63 students were reclassified in the 2021-22 school year with ELPAC scores from 2019 and 2018. In addition, the LEA did not provide monitoring data or individual monitoring records for sampled reclassified students to demonstrate that the LEA monitors the progress of reclassified students for four years.

WCCUSD must submit evidence as follows into the CMT:

1. Identification and explanation as to why the approximately 63 identified students were reclassified without current ELPAC scores in the 2021-22 school year.
2. Provide updates to LEA reclassification policies and procedures to ensure students are only reclassified with recent ELPAC assessment scores. Updates should include measures to ensure that once a student scores an overall performance level of 4 on the ELPAC, a student will be considered for reclassification.
3. Provide training to all staff involved in the reclassification process on the updates to the LEA's reclassification policies and procedures. Evidence must include agendas, attendance records, and meeting minutes from the training.
4. Provide individual student RFEP progress monitoring records showing interventions, as applicable, for the 12 sampled reclassified students from DAHS, RHS, HMS, and LES.

7. EL 11: Teacher EL Authorization

Teachers assigned to provide ELD and instruction in subject matter courses for ELs must have the appropriate authorizations.

The LEA did not provide documentation to demonstrate that teachers had the appropriate authorizations.

WCCUSD must submit into the CMT a sortable spreadsheet of all teachers in the LEA by name, site, and appropriate Commission on Teacher Credentialing EL authorization code, or temporary county certificate with EL authorization.

8. EL 12: Professional Development Specific to English learners

Each LEA must provide PD specific to the implementation of programs for ELs. Each LEA must provide sufficient PD to effectively implement the LEA's EL program. PD is provided to classroom teachers, principals and other school leaders, administrators, and other school or community-based organizational personnel, that is: (a) Designed to improve the instruction and assessment of ELs; (b) Designed to enhance the ability of teachers, principals, and other school leaders to understand and implement curricula, assessment practices and measures, and instructional strategies for ELs; (c) Effective in increasing the student's ELP or substantially increasing the teacher's subject matter knowledge, teaching knowledge, and teaching skills as demonstrated through classroom observation; and (d) Of sufficient intensity and duration (which shall not include activities such as one-day or short-term workshops and conferences) to have a

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positive and lasting impact on the teacher's performance in the classroom.

The LEA did not provide evidence of EL-specific PD to all teachers, staff and administrators. While one EL-specific PD session was provided for each reviewed site, evidence did not demonstrate that EL-specific PD in the 2021-22 school year was of sufficient intensity duration to have a positive and lasting impact on teacher's subject matter knowledge, teaching knowledge, and teaching skills. In addition, there was insufficient evidence provided to demonstrate that strategies learned in EL-specific PD were implemented effectively across classrooms at the reviewed sites. Specifically, only one classroom observation sample was submitted for RHS.

WCCUSD must provide evidence into the CMT as follows:

1. An EL-specific PD plan outlining the topics, delivery method, providers, and timeline for providing PD to all teachers and administrators, enhancing their ability to understand and use curricula, assessment measures, and instructional strategies specific to language and core subject instruction for ELs. The plan must include strategies to support school sites in implementing EL-specific PD for teachers, administrators and staff.
2. Completed PD calendars for the 2022-23 school year for DAHS, RHS, HMS, and LES that include EL-specific components that meet the above requirements.
3. Classroom observation protocols, designed to monitor the implementation of strategies learned via PD to ensure they are effectively in the classroom.

9. EL 13: Language Acquisition Program Options and Parent Choice

School districts and county offices of education must, at a minimum, provide ELs with a structured English immersion (SEI) program. (EC Section 305[a][2]) SEI programs provide nearly all classroom instruction in English, but with curriculum and a presentation designed for students who are learning English. Parents or legal guardians of students enrolled in the school may choose a language acquisition program that best suits their child. "Language acquisition program" refers to educational programs designed to ensure English acquisition as rapidly and as effectively as possible and provide instruction to students on the state-adopted academic content standards, including the ELD standards. The language acquisition programs shall be informed by research and must lead to grade level proficiency and academic achievement in both English and another language. An LEA shall notify parents of the language acquisition programs and language programs available in the LEA. The notice must be included with other parent and guardian rights and responsibilities required by EC sections 48980 and 48981. Parents of pupils enrolling in an LEA after the beginning of the academic school year shall be provided the notice described above upon enrollment. The notice shall include all of the following: (a) A description of any language acquisition programs provided, including Structured English Immersion; (b) Identification of any language to be taught in addition to English, when the program model includes instruction in another language; (c) The information set forth in Title 5 California Code of Regulations (5 CCR) Section 11309[c]; (d) The process to request establishment of a language acquisition program (e) If the LEA offers language programs, the

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notice shall specify the language(s) to be taught, and may include the program goals, methodology used, and evidence of the proposed program's effectiveness. Schools in which parents or legal guardians of 30 students or more per school, or the parents or legal guardians of 20 students or more in any grade request a language acquisition program designed to provide language instruction must be required to offer a program to the extent possible. When the parents of 30 pupils or more are enrolled in a school, or when the parents of 20 pupils or more in the same grade level are enrolled in a school, request the same or substantially similar type of a language acquisition program, the LEA shall respond by taking actions to demonstrate the timelines and requirements in 5 CCR Section 11311[h] are met by the LEA. In the case where the LEA determines it is not possible to implement a language acquisition program requested by parents, the LEA shall provide in written form an explanation of the reason(s) the program cannot be provided and may offer an alternate option that can be implemented at the school.

The LEA did not provide the parent and guardian rights and responsibilities handbook required by EC sections 48980 and 48981. Therefore, the process for choosing a language acquisition program that best suits their child was not communicated to all parents. In addition, a review of EL student data submitted by the LEA demonstrated that approximately 324 EL students are not enrolled in a program of language acquisition.

WCCUSD must submit documentation into the CMT as follows:

1. The LEA's 2021-22 parent and guardian rights and responsibilities handbook with the language acquisition program parental notice, containing all required elements, included.
2. Evidence that the parental notice has been distributed, made available to all parents, and will be used moving forward for any students enrolling in the future.
3. The LEA's approved processes and procedures for schools responding to parent requests for language acquisition programs.
4. Evidence, such as a sortable spreadsheet, demonstrating that all currently identified ELs are enrolled in a program of language acquisition—at minimum, a program of SEI.

10. EL 14: ELD

As part of the standard instructional program provided through general funds, all identified ELs must receive a program of ELD instruction, which shall include designated and integrated ELD. (a) Designated ELD means instruction provided during a time set aside in the regular school day for focused instruction on the state-adopted ELD standards to assist English learners to develop critical English language skills necessary for academic content learning in English. (b) Integrated ELD means instruction in which the state-adopted ELD standards are used in tandem with the state-adopted academic content standards. Integrated ELD includes specially designed academic instruction in English. ELD instruction must be designed for ELs to develop proficiency in English as rapidly and effectively as possible and to meet state priorities. Each LEA must take appropriate action to overcome language barriers that impede equal participation by students in instructional programs. Title III funds shall be used to supplement the standard instructional ELD program. ELD must be based on sound educational theory, implemented

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effectively with adequate resources and personnel, and, after a trial period, evaluated for its effectiveness in overcoming language barriers.

A review of documentation including designated ELD program descriptions, instructional materials, and instructional schedules, demonstrated that while the LEA has provided some ELD instruction, the LEA did not demonstrate full implementation of the ELD program. Specifically, sample student schedules from DAHS, RHS, and HMS demonstrated that not all ELs receive protected time for designated ELD. In addition, documentation and discussions with LEA staff revealed that the LEA has not completed the adoption process for elementary designated ELD instructional materials. Finally, the LEA did not submit an evaluation of ELD program effectiveness.

WCCUSD must submit evidence into the CMT to demonstrate that all EL students receive a program of language acquisition that targets the specific needs of all ELs at all proficiency levels and in all instructional settings as follows:

1. An ELD evaluation of program effectiveness, which includes an analysis of all available data (ELPAC, RFEP, EL graduation rates, state and local ELA and math assessments, etc.) and a report on analytical findings that includes determination of what adjustments are needed to implement the ELD program effectively.
2. Evidence that the LEA has adopted and implemented appropriate elementary ELD instructional materials for all elementary grade levels and all proficiency levels.
3. For DAHS, RHS, and HMS, provide evidence, including, but not limited to, course descriptions, course rosters, revised master schedules, and revised student schedules or transcripts showing that all ELs at all grade and proficiency levels are enrolled in a period of designated ELD per the LEA's program design.

11. EL 15: Access to Standard Instructional Program

Academic instruction for ELs in grades TK–12 must be designed and implemented to ensure that ELs meet the LEA's content and performance standards for their respective grade levels within a reasonable amount of time. Academic instruction may be facilitated by the SBE EL Roadmap policy. Each LEA must ensure that ELs in middle and high school are not denied participation in the standard instructional program, which, at a minimum, means: (a) Enrollment in the standard instructional program, which, at a minimum, consists of: i. Core curriculum courses (reading/language arts, mathematics, science, and history/social science), ii. Courses required to meet state and local high school graduation requirements, and iii. Courses required for middle school grade promotion; (b) Enrollment in a full course load of courses that are part of the standard instructional program, and (c) Enrollment in courses that meet the subject matter requirements for purposes of recognition for college admissions, such as honors or advanced placement courses. Each LEA must monitor student academic progress and provide additional and appropriate educational services to ELs in grades TK–12 for the purposes of overcoming language barriers in each subject matter. Actions to overcome content academic barriers must be taken before the deficits become irreparable.

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A review of documentation, including EL student data, master schedules, sample student schedules placement guidelines, discussions with LEA staff, and sample progress monitoring records demonstrated that some ELs at DAHS, RHS, and HMS do not have access to grade level content and performance standards for their respective grade levels, particularly, ELs enrolled in the ELA for English Learners course. In addition, documentation demonstrated that not all ELs at DAHS, RHS, and HMS have access to the standard instructional program that all students have access to, particularly, ELs enrolled in sheltered social science, science, and math courses. The LEA's placement guidelines suggest that only ELs in ELD 3 and 4 may have access to standard instructional program grade-level English, social science, science, and math courses. In addition, EL progress monitoring samples were not provided for all sites under review.

WCCUSD must submit evidence into the CMT that demonstrates established policies and procedures to ensure that all EL students are provided with access to the standard instructional programs that all students have access to as follows:

1. Provide updates to the LEA's procedural guidelines and criteria for placement of ELs, grades 6-12, at all ELP levels, into grade-level standard instructional program courses that all students have access to, and interventions. Include objectives for exiting intervention services;
2. Provide documentation including, but not limited to, updated master schedules, individual student schedules, course rosters with the English language acquisition status and grade level of students notated, and documentation of administrative and teacher training regarding the differentiation of instructional strategies for ELs across the curriculum.
3. Provide three additional individual EL student progress monitoring records from DAHS, RHS, HMS, and LES, which include documented interventions and supports provided to ELs who are struggling academically in core content courses.

Fiscal Monitoring

1. FM 01: Time and Effort Requirements

To support salaries and wages for employees that work on federal programs, LEAs are required to maintain time and effort records that accurately reflect the work performed. These time and effort records must: (1) be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated; (2) be incorporated into the official records of the LEA; (3) reasonably reflect the total activity for which the employee is compensated by the LEA, not exceeding 100 percent of compensated activities; (4) encompass both federally assisted and all other activities compensated by the LEA on an integrated basis, but may include the use of subsidiary records as defined in the LEA's written policy; (5) comply with the established accounting policies and practices of the LEA; and (6) support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity. Budget estimates or percentages determined before the services are performed alone do not qualify as support for charges to Federal awards.

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The LEA failed to provide the CDE the requested time and effort records for a sample of its employees who work on federal programs. As a result, the LEA is unable to substantiate that \$2,227,098.74 in salaries and benefits are properly charged to the Title I, Part A program, Title II program, and Title III program. Additionally, CDE's review of the LEA's time and effort policies and procedures and interviews with staff found the LEA did not maintain contemporaneous time and effort records in accordance with federal requirements. Furthermore, the LEA did not maintain a system of internal controls which provides reasonable assurance that charges are accurate, allowable and allocable.

The LEA must upload into the CMT the requested time and effort documentation for review. If the LEA fails to provide the requested documentation for review, or if the documentation does not meet federal requirements, the LEA may be required to transfer up to \$1,691,571.30 to reimburse the Title I program, and \$341,849.48 to reimburse the Title II program, and \$193,677.96 to reimburse the Title III program in unrestricted funds. Additionally, the LEA must update its time and effort records and policies and procedures to ensure that all salaries and wages charged to federal programs are properly supported in accordance with federal requirements. Specifically, the time and effort records must accurately reflect the work performed and identify the activity or cost objective. Furthermore, the LEA must update its time and effort policies and procedures to ensure the LEA has a system of internal control for documenting and reconciling time and effort in accordance with federal requirements. Once these documents are updated, the LEA will need to provide training to staff on the updated policies and procedures and upload evidence of the training to the CMT for review, including who attended and the training presented. Furthermore, the LEA must upload evidence of federally compliant time and effort records for April 2022 for employees sampled during the monitoring review.

2. FM 02: Allowable Costs

LEAs are required to maintain documentation to substantiate that all costs charged to the federal programs are reasonable, necessary, allocable and allowable in accordance with applicable program requirements.

The LEA failed to provide CDE all of the requested documentation to support a sample of expenditures charged to the federal programs under review. As a result, the LEA is unable to support that \$136,119.80 in costs charged to the Title I Part A, Title II, and Title III programs are allowable, including \$54,000.00 in Title I, Part A, \$5,963.60 in Title II, and \$76,156.20 in Title III expenditures.

The LEA must also upload into the CMT the requested documentation to substantiate \$54,000.00 in Title I, Part A expenditures, \$5,963.60 in Title II expenditures and \$76,156.20 in Title III expenditures for review. Pending the results of the review of the uploaded documentation or if the LEA fails to upload the requested documentation, the LEA may be required to reimburse the Title I Part A, Title II and Title III programs up to \$136,119.80 using unrestricted funds.

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3. FM 03: Supplement, Not Supplant

LEAs are required to use federal funds only to supplement, not supplant, state and local funds.

The LEA failed to provide the time and effort and expenditure documentation the CDE requested for the federal programs under review. As a result, the LEA is unable to substantiate that the federal funds are being used to supplement state and local funds.

To determine whether federal funds were only used to supplement state and local funding, the LEA must upload into the CMT the requested time and effort and expenditure documentation for review. If the LEA fails to provide the requested documentation for review, or the documentation does not meet federal requirements, the LEA may be required to reimburse one or more federal programs.

4. FM 06: Reporting

The LEA is required to provide evidence that it complied with the accountability and reporting requirements for the Title IV 21st Century program.

The LEA failed to provide sufficient evidence to support that it properly reported Title IV 21st Century program expenditures to the CDE in accordance with program requirements.

The LEA must provide documentation to support that the LEA is following properly reporting Title IV 21st Century program expenditures to CDE.

Supporting Effective Instruction

1. SEI 03: Review and Revise Local Control and Accountability Plan Federal Addendum

The LEA shall review and revise its LCAP Federal Addendum as required, which shall remain in effect for the duration of the LEA participation in the Title II, Part A program.

During the review, the LEA provided the LCAP Federal Addendum that was originally approved by CDE in 2019. WCCUSD did not submit evidence of a process to review and if necessary, revise the LCAP Federal Addendum.

The LEA must create a process that indicates roles and responsibilities pertaining to the review and revision of the LCAP Federal Addendum as well as a timeline outlining when the actions will occur. The plan must identify the individuals and their positions responsible for the review and revision process for each Title (Title I, Title II, Title III, and Title IV) as well as the person(s) responsible for obtaining input from educational partners. Once the LEA has created this process they must upload the document into the CMT for CDE review. After approval, CDE will coordinate a training session for the WCCUSD LCAP Federal Addendum team. This training

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information with all participants listed must be recorded in the CMT. After WCCUSD receives training, the LEA must review and revise their entire LCAP Federal Addendum, including receiving input and feedback from educational partners and receiving local board approval. Once the newly approved LCAP Federal Addendum is locally board approved the LEA must submit the revised LCAP Federal Addendum and the board meeting minutes into the CMT.

2. SEI 04: Identify and Address Disparities

The LEA shall identify and address any disparities that result in low-income students and minority students being taught at higher rates than other students by ineffective, inexperienced, or out-of-field teachers as required in the LCAP Federal Addendum under Title I, Educator Equity.

The LEA failed to provide evidence of Educator Equity Data as well as a process to identify and address disparities of low-income and minority students being taught at a higher rate by inexperienced and ineffective teachers. During the review, the LEA indicated they have not reviewed or revised their LCAP Federal Addendum which requires this provision to be addressed.

The LEA must develop and upload into the CMT a plan, in alignment with their review and revision process of the LCAP Federal addendum, that includes the process and timeline to collect and analyze data on the number of ineffective and inexperienced teachers in comparison to the number of low-income and minority students at comparable sites districtwide. The plan must include developing an equity leadership team and a plan to engage educational partners to identify potential equity gaps, conduct a root causes analysis, and consider various strategies to address any disparities. The LEA must conduct, in collaboration with district leadership ((Human Resources, Educational Services, and Curriculum & Instruction), educational services, and a programmatic self-assessment focused on the relevant teacher equity data gathered, along with the policies, procedures, and practices related to providing equitable access to teachers in the LEA. A programmatic self-assessment should include the following elements:

- Thorough and reflective analysis of a broad range of school-level data with a focus on the relevant teacher equity data gathered in Step 1, student race/ethnicity and poverty data by school, and teacher race/ethnicity data by school
- Reflective review of information on policies, procedures, and practices relevant to providing equitable access to teachers (beyond questions of compliance)
- Review of all existing LEA-wide and schoolwide initiatives
- Engagement of key personnel through surveys, focus groups, interviews, and other tools to gather insight from a diverse representation of individuals who oversee and are affected by teacher equity (district office of human resources, curriculum, induction, and school-based personnel such as teachers, principals, and teacher coaches)
- Engagement of other key school community stakeholders through surveys, focus groups,

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empathy interviews, and other tools to gather insight from diverse representation of individuals who oversee and are affected by teacher equity (students, parents, and representatives from school partners and community organizations)

-Review the summary of the Programmatic Self-Assessment results with stakeholders and get feedback

After WCCUSD develops their plan and uploads it into the CMT for CDE review and approval, CDE will conduct training with the equity leadership team. The documentation for the training and list of participants will be documented into the CMT by CDE. Then, the LEA must upload into the CMT evidence of implementing the educator equity process including agendas, data, data analysis, and meeting minutes.

3. SEI 05: Use of Funds

An LEA that receives a subgrant under Title II, Part A, shall use the funds made available through the subgrant to develop, implement, and evaluate comprehensive programs and activities: (1) in accordance with the purpose of Title II; and (2) that address the learning needs of all students.

Based on a review of the general ledger, purchase orders, invoices, and district forms, the LEA was not able to substantiate the following expenditures:

1. 12/31/20 \$151,250.00 WARRANT 1160 – TEACHER STIPEND
2. 05/28/21 \$8,537.50 WARRANT 1910 – OTHER CERTIFICATED REGULAR
3. 11/24/20 \$69,576.93 CONSULTANT CONTRACT 5100 – SUB AGREEMENT SERVICES
4. 04/09/21 \$995 FIRE CONFERENCE FOUNDATION FOR INCLUSIVE RELIGIOUS
5. 1160 12/30/21 162,475.00 WARRANT 1160 – TEACHER STIPEND.

The LEA also expended funds that are not in alignment with Title II.

12/15/20 \$4,319.61 CRED REIMBURSEMENT

First, the LEA must credit the Title II program back \$4,319.61 with general unrestricted funds and upload a journal entry as evidence into the CMT. Second, the LEA must either a) reimburse the Title II program \$392,834.43 with general unrestricted funds and upload a journal entry as evidence or b) submit backup documentation that meets federal accounting guidelines to justify expenditures.

4. SEI 07: Supplement Not Supplant

An LEA that receives funds made available under Title II, Part A shall be used to supplement,

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and not supplant, state and local funds that would otherwise be used for activities.

The LEA failed to upload sufficient documentation.

The LEA must upload to the CMT backup documentation to justify expenditures or credit back the Title II program \$392,834.43 with general unrestricted funds and upload a journal entry as evidence into the CMT.

5. SEI 09: Certification and Licensure

All teachers and paraprofessionals meet applicable state certification and licensure requirements, including any requirements for certification obtained through alternative routes to certification.

The LEA failed to submit evidence of teachers and paraprofessionals meeting state certification and licensure requirements.

The LEA must submit into the CMT a sortable spreadsheet that includes each teacher's name, credential(s), subject matter authorization, current assignment, and site. The LEA must also submit a sortable spreadsheet of all paraprofessionals districtwide that includes the paraprofessional's name, site, current assignment, and how they meet state certification and/or licensure. The LEA must develop a process that outlines the process to pull the reports, the person(s) responsible, and, the timeline for actions to be completed. CDE will collaborate with the Human Resource department till the process is compliant.

6. SEI 12: Data and Ongoing Consultation

The LEA must use data and ongoing consultation to continually update and improve activities supported by Title II.

Based on a review of evidence and interviews with staff the LEA is not progress monitoring the effectiveness of Title II funds.

The LEA must use data and ongoing consultation to continually update and improve activities supported by the Title II program. To do so the LEA must upload evidence of how the Title II program is supporting department and LCAP goals based on data analysis. The LEA must identify how Title II funds will be used to supplement their current program. The LEA must submit into the CMT the department and LCAP goals the Title II program will be supporting as well as the process the LEA will use to evaluate the program(s) effectiveness. The plan must include input and feedback from educational partners, data analysis, and the timeline of when activities will be conducted. CDE will collaborate with the LEA to develop this process and support it.

7. SEI 13: Parents' Right to Know Teacher Qualifications

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At the beginning of each year, an LEA that receives Title I funds shall notify the parents of each student attending any school receiving Title I funds that the parents may request, and the agency will provide the parents on request (and in a timely manner), information regarding the professional qualifications of the student's classroom teachers, including at a minimum, the following: (a) Whether the student's teacher: i. Has met state qualification and licensing criteria for the grade levels and subject areas in which the teacher provides instruction; ii. Is teaching under emergency or another provisional status through which state qualification or licensing criteria have been waived; and iii. Is teaching in the field of discipline of the certification of the teacher. (b) Whether the student is provided services by a paraprofessional, and if so, their qualifications. For schools that receive Title I funds, an LEA shall provide timely notice that the student has been assigned, or has been taught for four or more consecutive weeks by, a teacher who does not meet applicable state certification or licensure requirements at the grade level and subject area in which the teacher has been assigned.

Based on a review of the documentation provided the LEA is not providing families at Title I sites information about their right to request information about teacher qualifications. And, the LEA is not sending the four-week letters to families at Title I sites when their child is taught for four or more consecutive weeks by a teacher who is not fully credentialed to teach the grade level or subject they are currently teaching.

The LEA must submit into the CMT evidence that families of students at Title I sites have been notified of their right to request information on teacher qualifications along with the process to ensure families are notified yearly of their rights. The LEA must also submit into the CMT evidence the four-week letter was sent to all Title I families who have a child that was taught for four or more consecutive weeks by a teacher who does not meet State certification or licensure requirements. The LEA must also develop and upload into the CMT a plan relating to its internal controls surrounding the Four-Week letter and Parents' Right to Notice which should include a description of the task to be completed, the anticipated completion date, who is responsible to complete the task, a sample of the 4-week letter, the list of credentials and waivers that prompt the Four-Week letter, and the sample Parents Right to Notice. After the LEA creates and uploads the policy into the CMT for CDE approval CDE will conduct training to support the implementation of the process and ensure the LEA has systems in place to institutionalize the process.

School Support and Improvement

1. SSI 05: Local Educational Agency Administrative Charges; Time and Effort

The LEA must properly charge and document allowable salaries and wages that are reasonable and necessary in accordance with applicable Comprehensive Support and Improvement (CSI) program requirements and federal accounting requirements.

A review of the LEA's time and effort documentation and procedures indicated the LEA did not maintain time and effort documentation in accordance with federal accounting requirements for the 2020-2021 school year.

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The LEA must submit to the CMT a CSI funding position control report for the 2020-2021 school year, as well as journal entries showing the reversal of salary and benefits charged to CSI for the 2020-2021 school year.

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