

Monitoring of Federal Programs

Office of Federal and State Accountability



Consolidated Oversight and Monitoring (COM) Team

CR Hall

Greg King

Barret Leviner

Peggy Scott



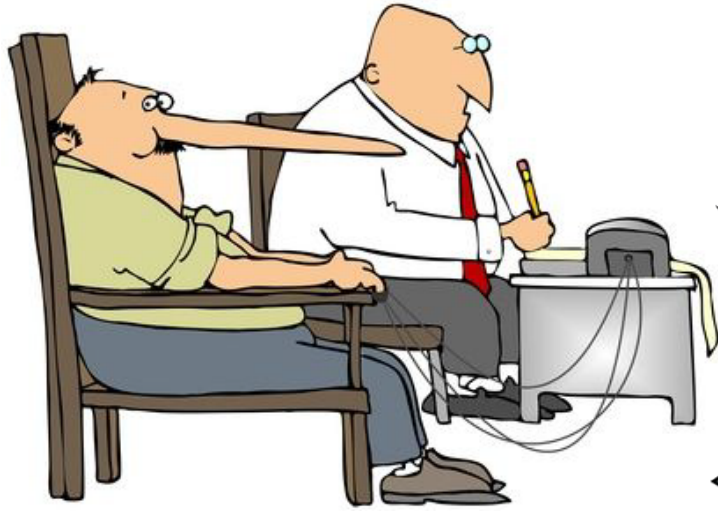
CR Hall	CR Hall	Greg King	Greg King	Barret Leviner	Barret Leviner	Peggy Scott	Peggy Scott	Vacant	Vacant
Chesterfield	Orangeburg	Allendale	Edgefield	Anderson 1	Florence 3	Abbeville	Georgetown	Aiken	Lexington 3
Greenwood 50	Orangeburg 80	Anderson 2	Florence 2	Anderson 3	Jasper	Anderson 80	Greenville	Barnwell 48	McCormick
Greenwood 51	Richland 2	Anderson 4	Florence 5	Anderson 81	Laurens 55	Beaufort	Lancaster	Barnwell 45	Palmetto Unified
Greenwood 52	Spartanburg 2	Anderson 5	Hampton	Charleston	Laurens 56	Beaufort 80	Lexington 4	Barnwell 80	Saluda
Greenwood 80	Spartanburg 4	Bamberg	Kershaw	Cherokee	Lexington 5	Calhoun	Marion	Cl at Erskine	SCPCSD
Horry	Spartanburg 81	Berkeley	Oconee	Chester	Spartanburg 3	Clarendon	Marlboro	Dillon 3	Spartanburg 1
Lee	Sumter	Dorchester 2	Pickens	DJJ	Spartanburg 5	Clarendon 80	Newberry	Dillon 4	Spartanburg 80
Lexington 1	Union	Dorchester 4	Richland 1	Fairfield	Spartanburg 6	Colleton	SCSDB	Dillon 80	
	Williamsburg	Dorchester 80	York 1	Florence 1	Spartanburg 7	Darlington	York 2	Lexington 2	
			York 4				York 3		



What Monitoring Is Not



What Monitoring is Not



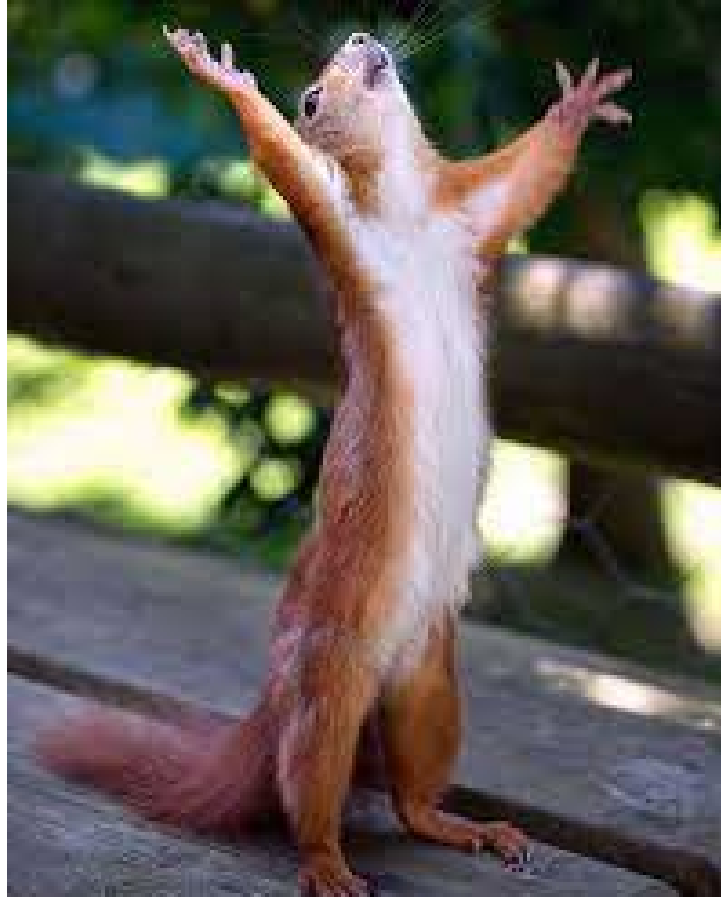
Gotcha!



Undesirable Outcome



Desirable Outcome





What Is Monitoring



Monitoring Process Overview

What is it?

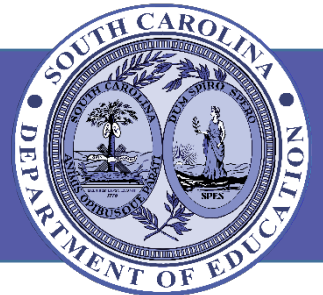
- SCDE monitors requirements/compliance of ESEA
- SCDE provides technical assistance
- SCDE works with LEAs to support programs and meet requirements

When is it?

- SCDE is currently utilizing a four-year cycle (with exceptions for consolidating or high-risk districts)
- LEAs being monitored have been contacted by the SCDE

How is it done?

- SCDE reviews evidence previously collected and LEA submitted materials
- Desk, Hybrid, On-Site, or Re-visit as determined by SCDE



Federal Programs Monitoring

- Federal programs monitoring has implemented a consolidated approach in which Titles I, II, III, IV, V, and N&D are reviewed simultaneously.
- All district level federal programs directors received an email with the 2022-23 monitoring schedule in August 2022.
- Districts selected for review also received a detailed email that includes the protocol.



Districts to be Monitored in 2022-23

Aiken	Laurens 56
Calhoun	Lexington 2
Cherokee	Marion
DJJ	Marlboro
Dorchester 2	Oconee
Dorchester 80 (state monitoring only)	Palmetto Unified (state monitoring only)
Greenville	Richland 1
Greenwood 50	Richland 2
Greenwood 52	SCPCSD
Greenwood 80 (state monitoring only)	Sumter
Jasper	Williamsburg
Laurens 55	York 1

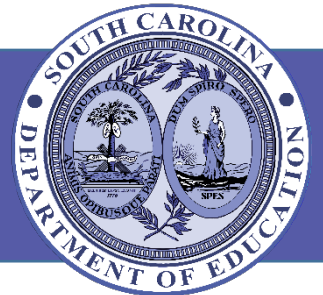
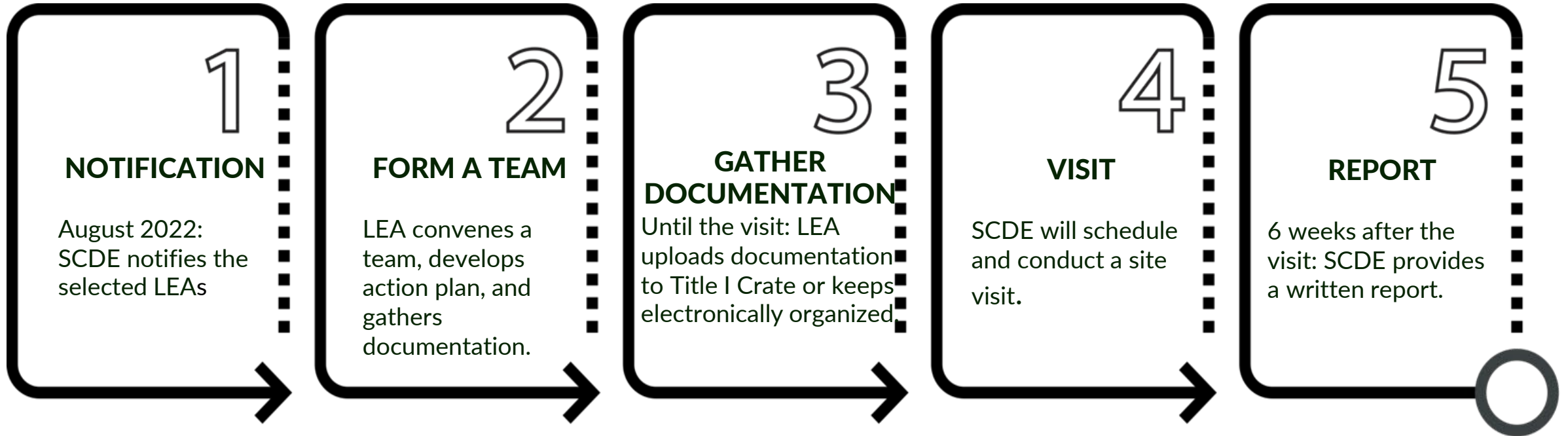


Overarching Requirements

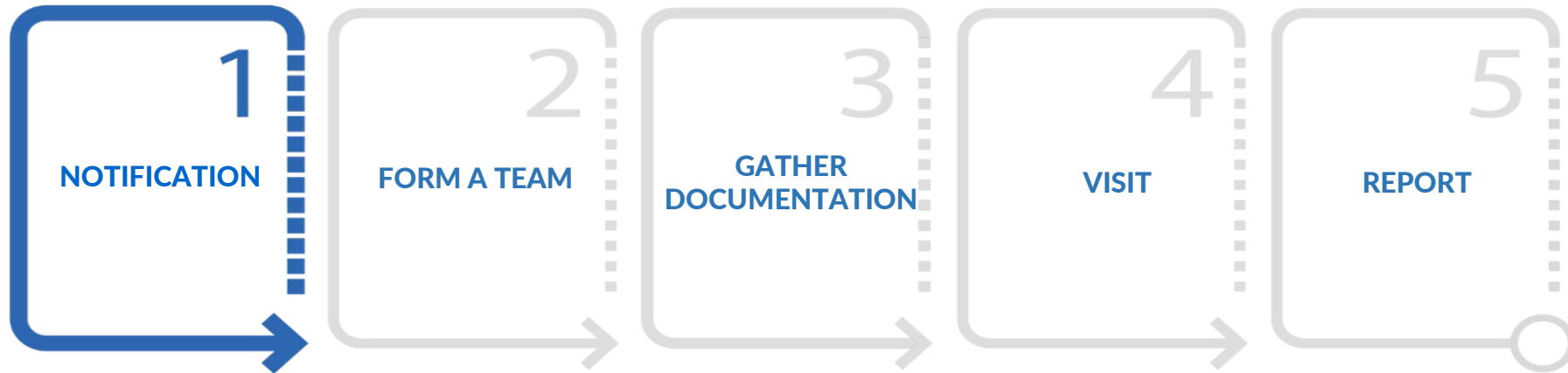
- Student identification and coordination of services
- Program needs assessment, services, and evaluation
- Family and community engagement
- School improvement
- Teacher and paraprofessional qualifications and professional development
- Fiscal accountability
- Report card reporting
- Equitable services to private schools



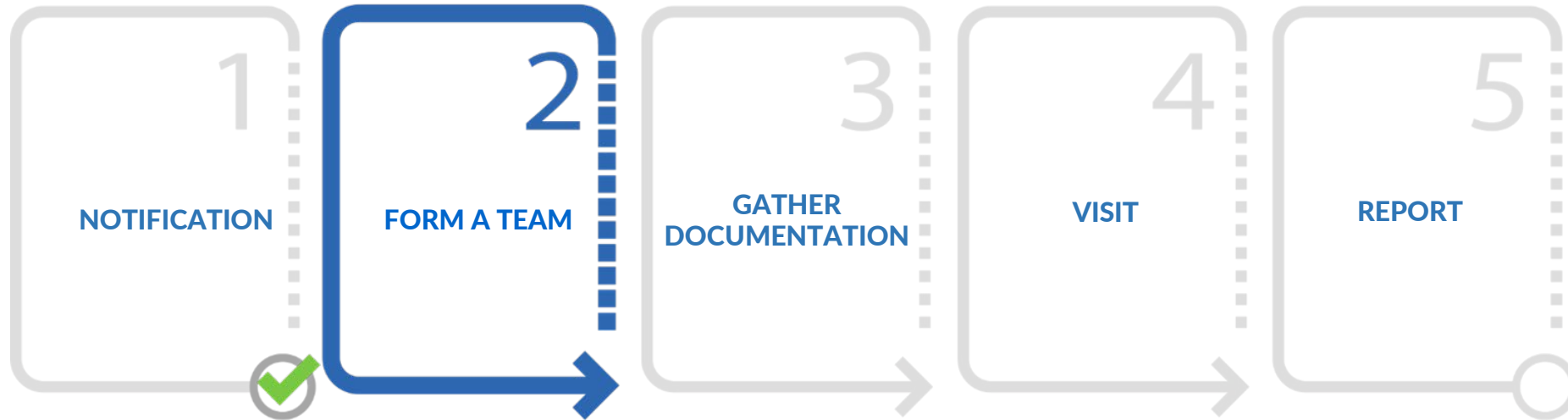
Monitoring Steps and Timeline



Step 1: Notification



Step 2: Form a Team

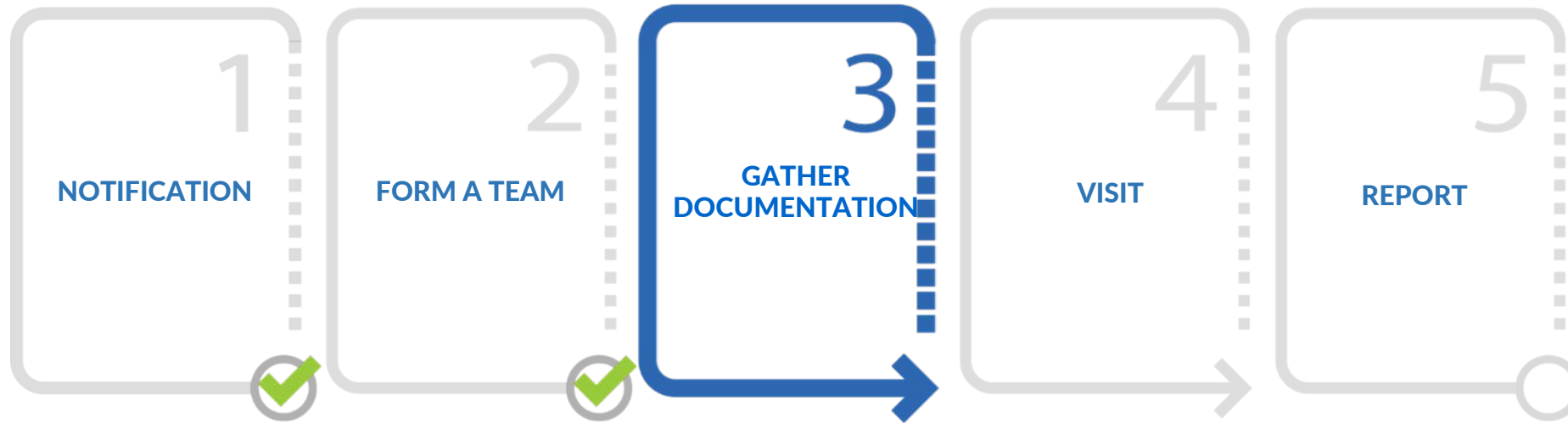


Form a team or utilize an existing leadership team:

- Identify a district level team lead to serve as a point of contact with SCDE.
- Review the guidance document together.

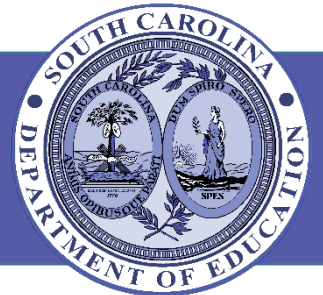


Step 3: Gather Documentation



Gather documentation:

- Determine location where all documentation will be stored.
- Submit documentation up until the assigned day of review.



Federal Programs Monitoring Documentation

1. Emails
2. Memos
3. Dated meeting agendas
4. Dated sign-in sheets
5. Checklists with comments
6. Record of physical inventory of equipment and real property
7. Fiscal documentation
8. Websites
9. Other forms of documentation

Document, document, document...

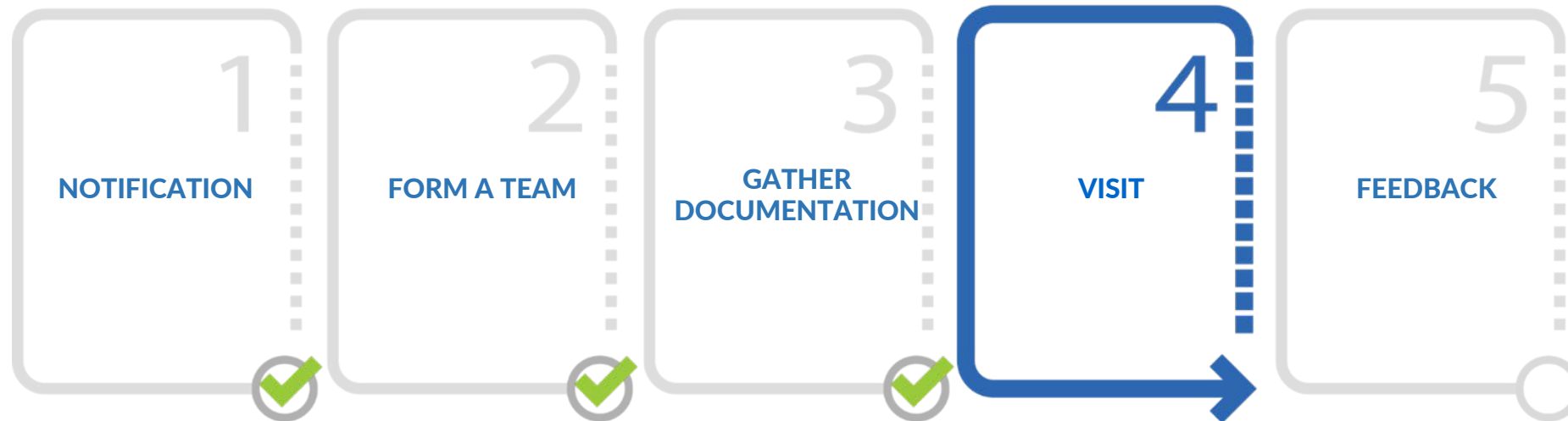


District Preparation Prior to On-Site Monitoring Visit

- Documentation should be uploaded to Title I Crate, as applicable. Upload documents year-round!
- If not using Title I Crate, documentation for each required descriptor should be placed in a folder for COM review; organize according to the monitoring protocol.



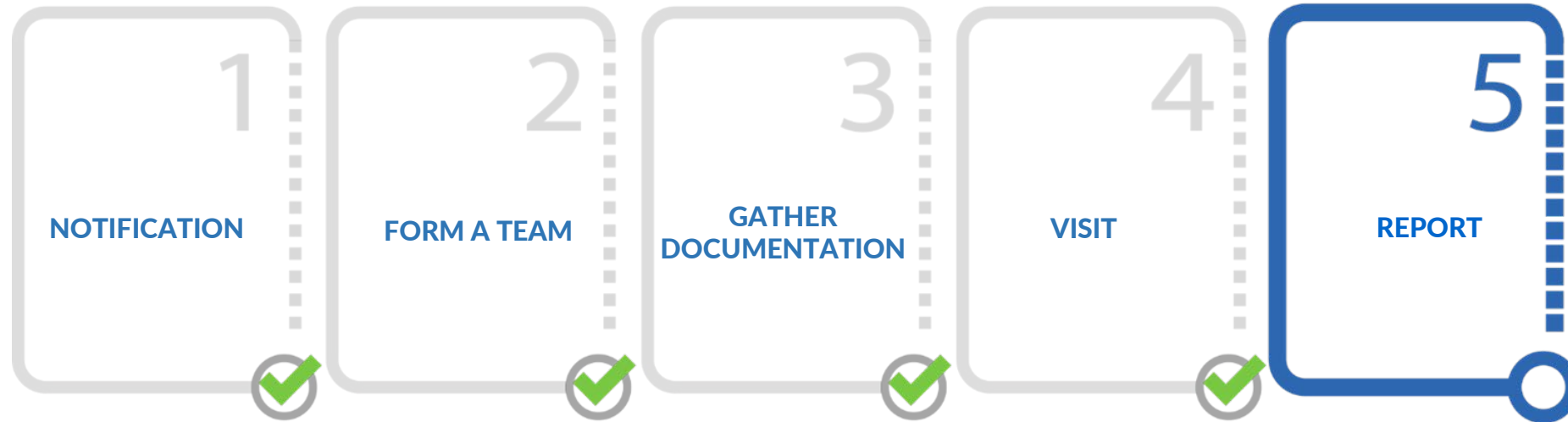
Step 4: Site Visit



- Arrive around 9:00am.
- Review requested documentation.
- Visit one to two schools and N&D facility (if applicable).
- Leave mid-afternoon.



Step 5: Report



Report:

- SCDE provides LEAs a written report within six weeks after the visit.
- It will identify areas for improvements, as well as commendations.



Common Challenges

Stakeholder Engagement:

- Involving stakeholders in the needs assessment and decision-making process

Private School Equitable Participation:

- Having a plan in place for equitable services to be provided to the private school(s) *before* the start of the school year

Multilingual (ML) Programs:

- Notifying parents of a multilingual learner identified for participation in the program



Common Challenges - continued

Family Engagement:

- Demonstrating authentic family engagement. Engaging **all** families in supporting their children's education, making decisions related to the education of their children, and participating in ongoing regular two-way meaningful communication

Foster Care:

- Written procedures governing transportation for students in out-of-home care

Parental Input:

- Only one input opportunity
- The Annual Title I Parent Meeting in the fall **cannot** be used as the only input opportunity

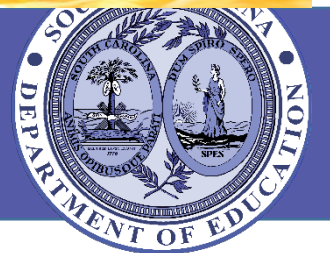
Teacher Rosters:

- The roster only includes teachers paid from federal funds or is a principal attestation.



Hot Topics

- Internal Controls
- Conflict of Interest
- Suspension and Debarment
- Prohibition on Certain Telecommunications and Video Surveillance Service or Equipment
- Time and Effort Documentation
- Updated Policies and Procedures



Internal Controls 200.303

- (a) “Establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award.”
- (b) Comply with the U.S. Constitution, Federal statutes, regulations, and the terms and conditions of the Federal awards.
- (c) Evaluate and monitor the non-Federal entity's compliance with statutes, regulations, and the terms and conditions of Federal awards.
- (d) Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.
- (e) Take reasonable measures to safeguard protected personally identifiable information (PII).

Internal controls must be adopted and implemented.



Conflict of Interest 200.318(c)(1)

- The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award, and administration of contracts.
- A conflict of interest occurs when an individual(s) has an interest in the firm selected for the award:
 - Employee, agent, or officer
 - Immediate family members
 - An individual's partner
 - Has a financial interest in the firm that was selected for the award
- Gratuities
 - Standards and limits must be established regarding favor, gratuities, or anything of monetary value from contractors and subcontractors.
 - Controls must include penalties and disciplinary actions for violations.



Suspension and Debarment 180.300

- LEA MUST verify that vendors and contractors with contracts over \$25,000 are not debarred or suspended.
- This can be accomplished by:
 - Obtaining a certification from the individual
 - Checking SAM.gov
 - Adding a clause or condition to the contract



Prohibition on Certain Telecommunications and Video Surveillance Service or Equipment 200.216

- Effective November 12, 2020
 - Prohibits contracts with certain covered entities
- Certain telecommunication and video surveillance equipment and/or services are allowable with certain restrictions (200.471).
- Prohibited equipment listed in 200.216
- Applicable to new contracts, renewals, extensions, services, and equipment



Time and Effort Documentation 200.430(i)

- Charges to Federal awards may include reasonable amounts for activities contributing and **directly related** to work under an agreement.
- Be necessary, reasonable, and allocable for the performance of the Federal award (200.403(a)).
- Documentation is critical.
 - Must be supported by internal controls to ensure that the charges are accurate, allowable, and allocable
 - Be part of the official records
 - Include all activities (federal and non-federal) based on reasonable amounts
 - Reflect the total activity of employee
 - Comply with established accounting practices and policies



Updated Policies and Procedures

- Recommended best practice
- Recommended by Brustein & Manasevit law firm and USED
- Ensure that all policies and procedures are up-to-date within the last two to three years.
- Must reflect the ESSA and updates.



Maintenance of Effort (MOE) §8521

- ESSER funding may skew calculation.
- Review every quarter to ensure compliance.
- Work closely with the finance director.
- Try to avoid non-compliance and using a waiver.





Thank You

Contact Information

CR Hall: chall@ed.sc.gov, 803-734-2439

Greg King: gking@ed.sc.gov, 803-734-0025

Barret Leviner: bleviner@ed.sc.gov, 803-734-3477

Peggy Scott: pescott@ed.sc.gov, 803-734-4040