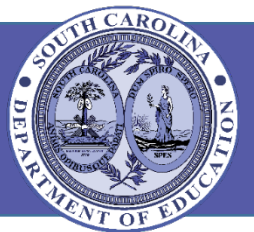


A Complete Guide to ESSA Consolidated Monitoring

Office of Federal and State Accountability



Consolidated Oversight and Monitoring (COM) Team

CR Hall

Greg King

Barret Leviner

Peggy Scott



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



What Monitoring Is Not



What Monitoring is Not



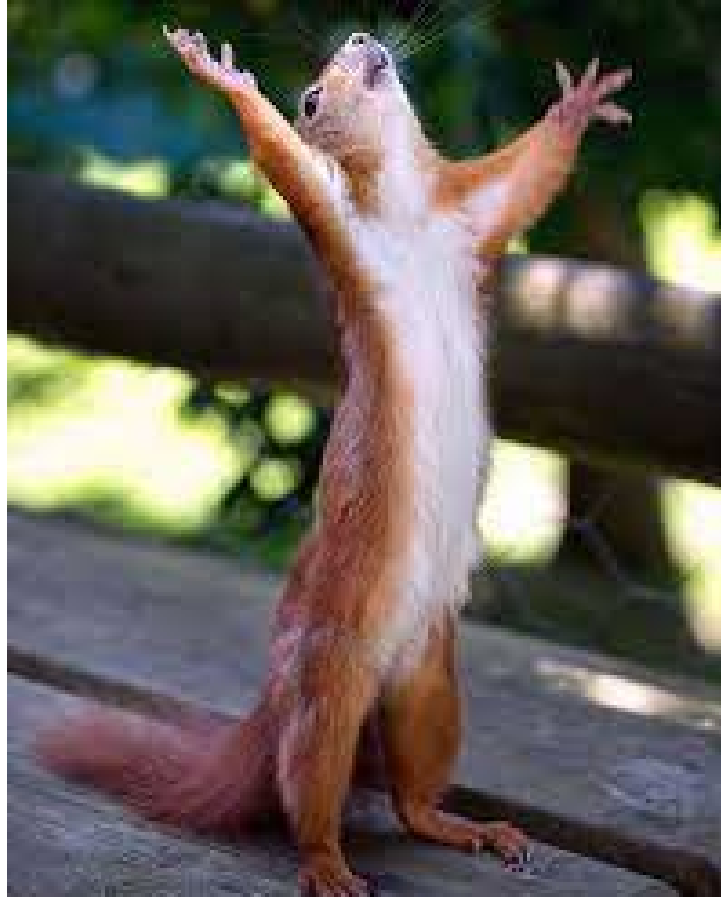
Gotcha!



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 program directors will receive an email with the 2024-25 monitoring schedule in August 2024.
- Districts selected for review also received a detailed email that includes the protocol.

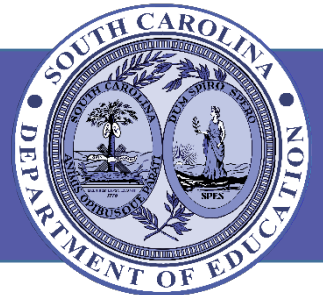
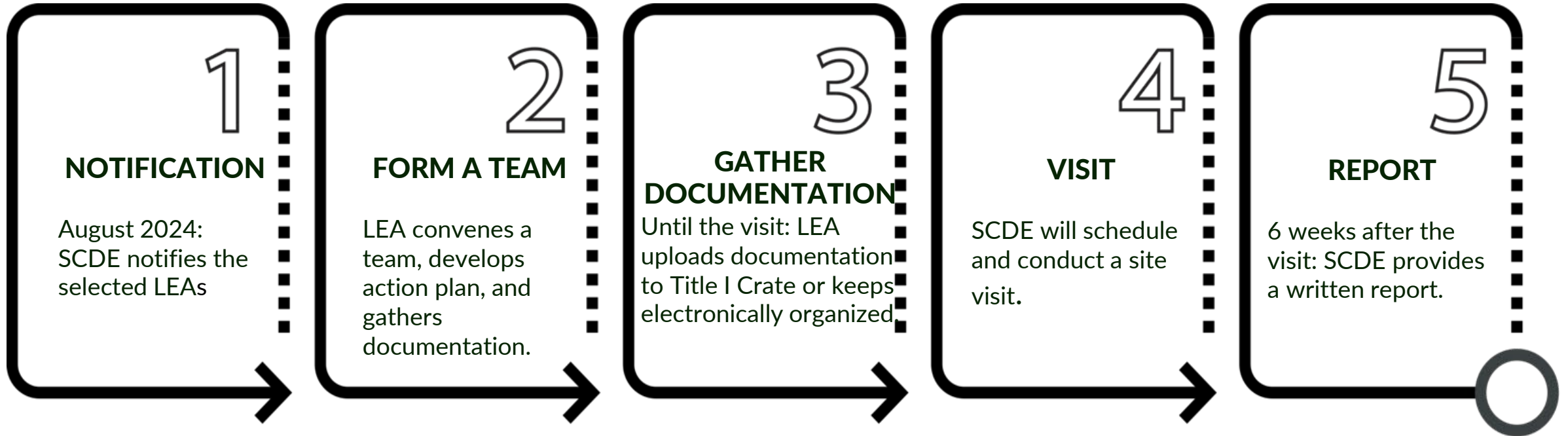


Overarching Requirements

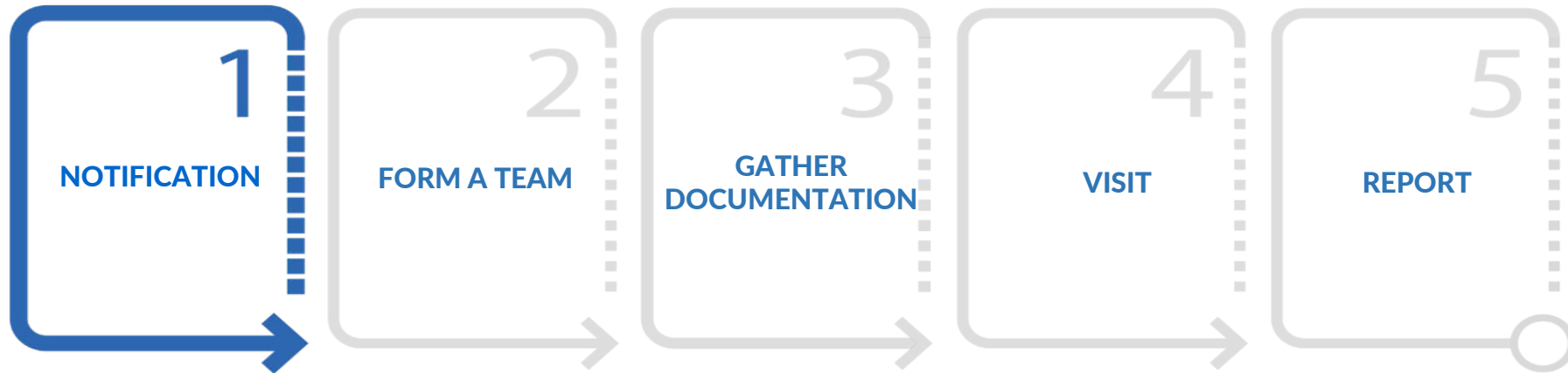
- Student identification and coordination of services
- Program needs assessment, services, and evaluation
- Family and community engagement
- School improvement
- Teacher and paraprofessional qualifications and professional development
- Fiscal accountability
- Report card reporting
- Equitable services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



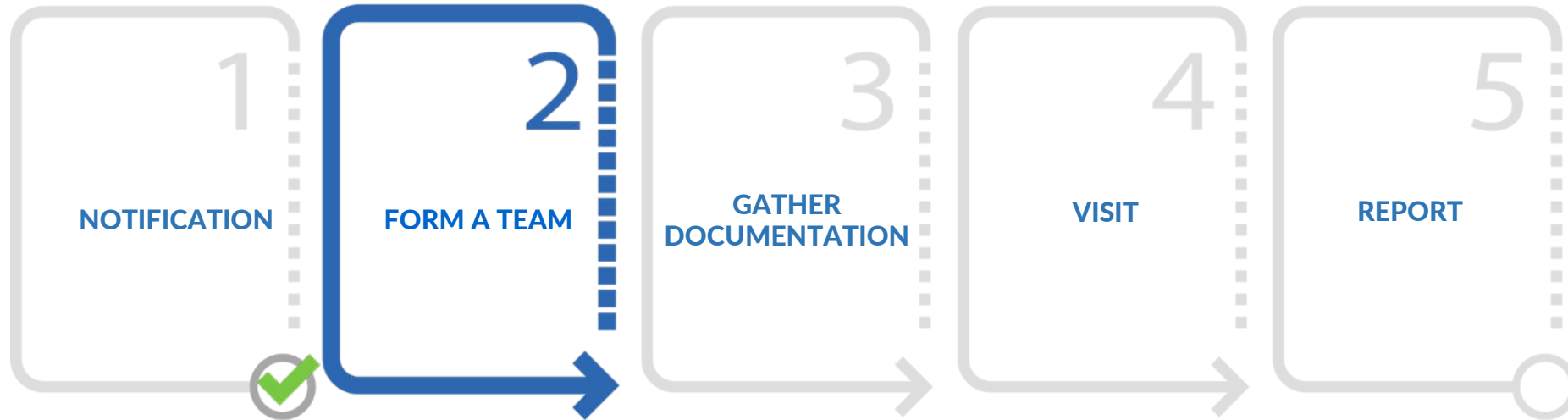
Monitoring Steps and Timeline



Step 1: Notification

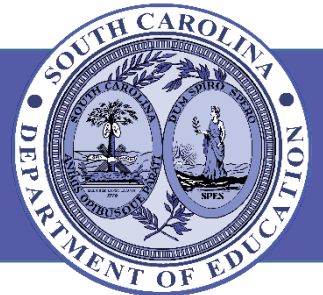


Step 2: Form a Team

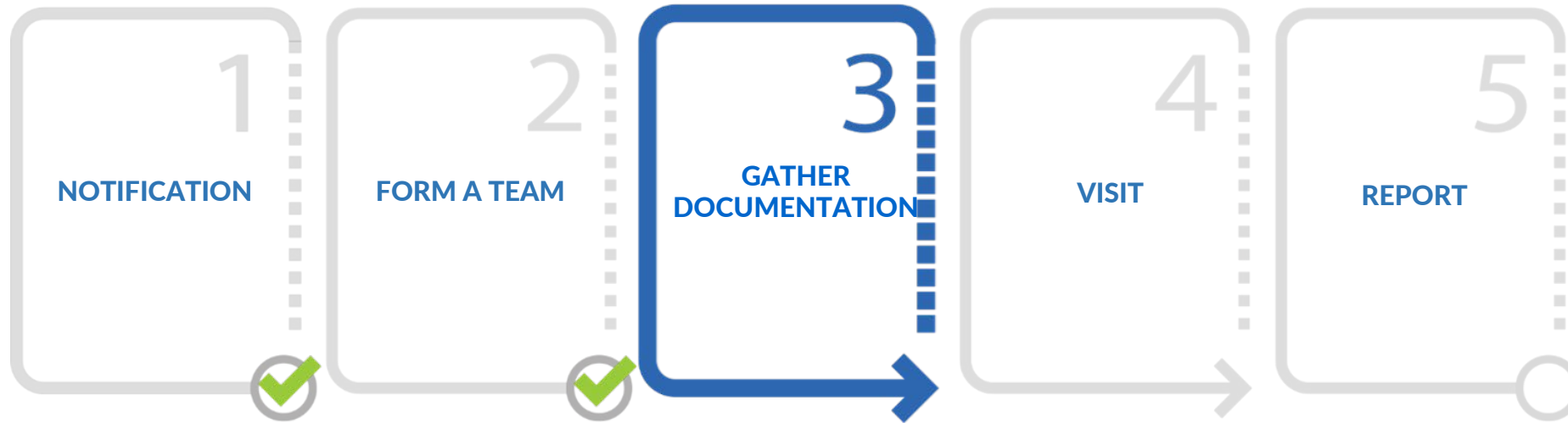


Form a team or utilize an existing leadership team:

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

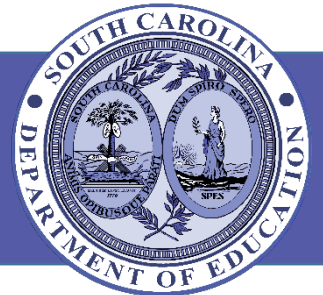


Step 3: Gather Documentation



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...

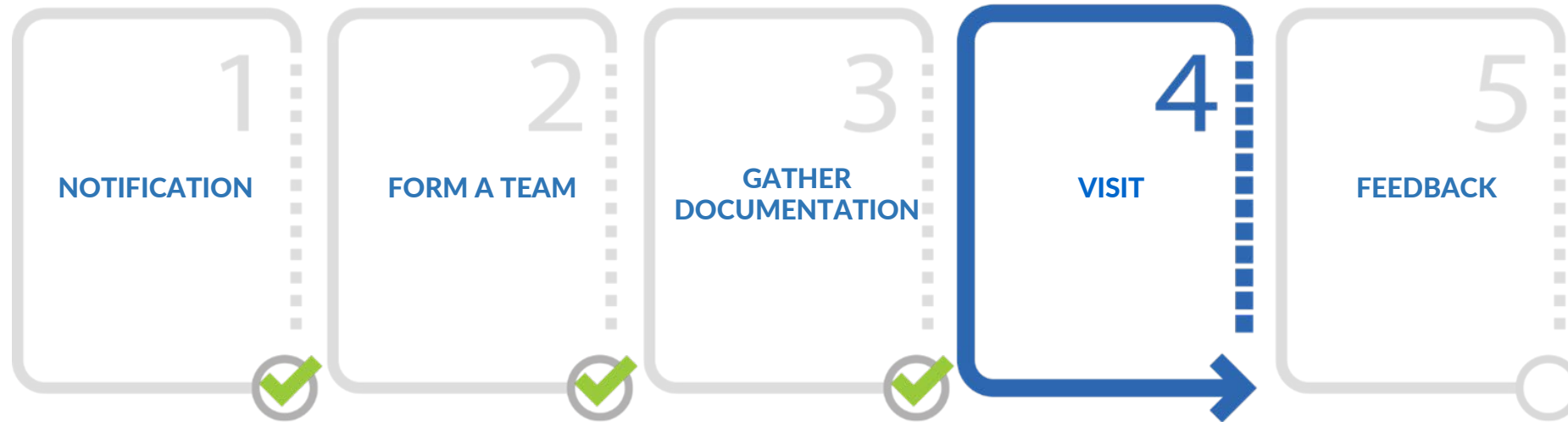


District Preparation Prior to On-Site Monitoring Visit

- 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 and organized according to the monitoring protocol.



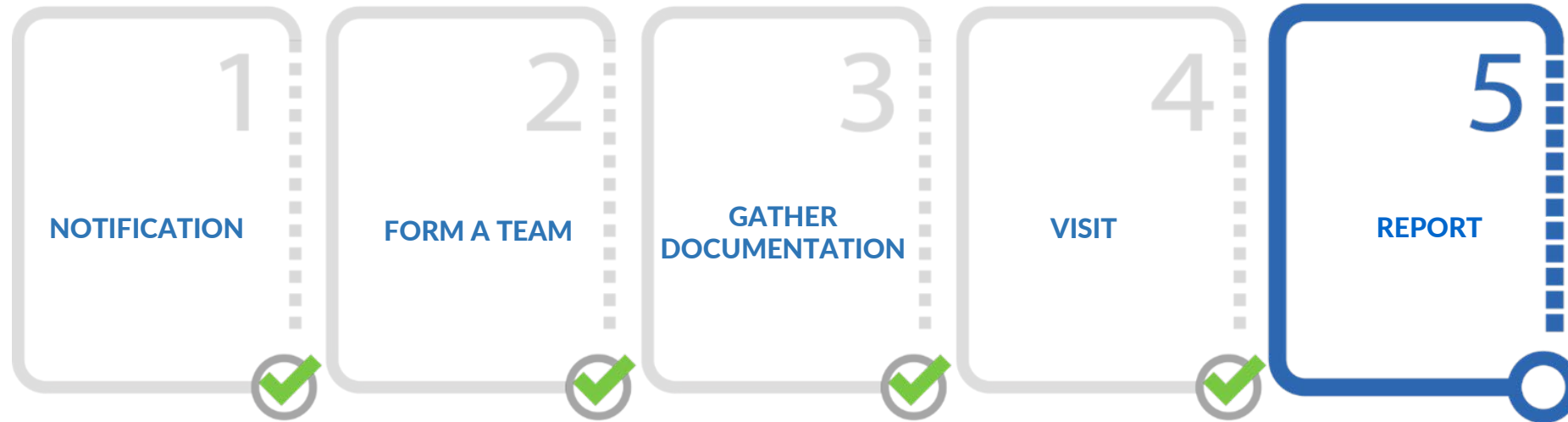
Step 4: Site Visit



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

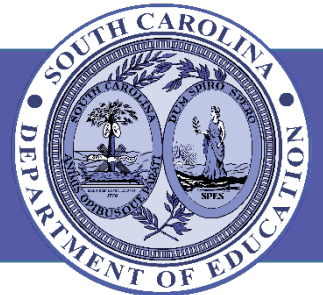


Step 5: Report



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



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.



Procurement and Monitoring

Federal Procurement Requirements

- All procurement transactions using *federal funds* **must** be conducted in a manner providing **full and open competition consistent** with 2 CFR 200.319(a) and §200.320
- *Noncompetitive procurements* can only be awarded in accordance with §200.320(c).



Noncompetitive Procurement with Federal Funds

Can only be awarded if one or more of the following apply:

1. The acquisition of goods or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold

- Procurement policy adopted by the subrecipient
- If the District is more restrictive, must use the most restrictive
- Do not split procurement to meet

2. The item is available only from a single source

- *Sole source procurement*
- Vendor has sole source letter (*This does not mean good/ service qualifies as sole source.*)



Noncompetitive procurement (Continued)

3. The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation

- Emergency Procurement (involves time constraint – leaves no time for competition)

4. The Federal awarding agency or pass-through entity **expressly authorizes a noncompetitive procurement in response to a written request** from the non-Federal entity

5. **After solicitation of a number of sources, competition is determined to be inadequate**



Best Practices- Planning is KEY

Spring Planning for FY25 Grants (continuity of services or new activities)

- Review timelines for schoolwide submissions, purchases, and procurement. May need to revise the timeline if the district seeks to contract with a vendor.
- Review current contracts and purchasing history. Survey schools to see which vendors they would like to use for the upcoming year to determine if the district may exceed the micro-purchase threshold.
- Reach out to the SCDE program manager prior to competition if implementing a new, innovative activity so the activity will be approved in the application.



Best Practices- Planning is KEY

Spring Planning for FY25 Grants (continuity of services or new activities)

- Remember that purchases that **exceed** the micro-purchase threshold must:
 - Follow the district's procurement policy
 - Seek full and open competition (**Start as soon as possible!**)
 - Do you need to seek sealed bids or solicit a proposal?
 - **Sealed bids**- Bidder conforms with all the material terms and conditions of the invitation and is the lowest price.
 - **Request for proposal (RFP)**- Identifies all evaluation factors and their relative importance. Awarded to the responsible offeror whose proposal is most advantageous to the recipient/subrecipient with price and other factors considered.
 - Only seek Non-Competitive Procurement Approval if necessary

No matter the method used for procuring goods or services, it must be necessary, reasonable, and allocable to the grant.



Procurement Monitoring

Indicator	Citation	Supporting Documents
FA 21 I-A II-A III-A IV-A V-B IX-A	The LEA must have and use documented procurement procedures, consistent with State and local standards for the acquisition of property or services required under Federal award or subaward. §200.318(a)	LEA's procurement policies and procedure manual Specific updates/revisions to the procurement policy to meet new requirements



Procurement Monitoring

Indicator	Citation	Supporting Documents
FA 22 I-A II-A III-A IV-A V-B IX-A	The LEA must have procurement transactions for the acquisition of property or services required under a federal award must be conducted in a manner providing full and open competition. §200.319(a)	Evidence of open competition: - Documentation demonstrating competition: - Bid packet, quotations, evidence of solicitations and/or advertisement, sole source or emergency justification



Procurement Monitoring

Indicator	Citation	Supporting Documents
FA 23 I-A II-A III-A IV-A V-B IX-A	The LEA must maintain procurement records. a. Description of goods or services b. Basis for contract price c. Justification for noncompetitive procurement §200.318(i)	Full documentation and evidence of document records: <ul style="list-style-type: none">- Completed noncompetitive procurement approval form- Any other supporting documents related to the noncompetitive approval form (as applicable)



Request for Noncompetitive Procurement Approval

- Titles I, II, IV, V, and N&D submit to Jennifer Rhodes (jrhodes@ed.sc.gov)

- Title III submit to Susan Murphy(smurphy@ed.sc.gov)

- McKinney-Vento submit to BirleyWright(Bwright@ed.sc.gov)

- ESSER submit to SCESSER@ed.sc.gov

- ATSI/CSI forms are submitted to the program manager assigned to the district.

- IDEA submit to Michelle Williams Young (smwilliamsyoung@ed.sc.gov)



Request for Noncompetitive Procurement Approval

Complete this form to request a noncompetitive procurement approval. The subgrantee's requestor (i.e., federal program director), business official/fiscal representative, and procurement official must sign this form. This form must be submitted via email to the program manager of the applicable program office from which you are seeking approval.

The subgrantee's exemptions list cannot be used for goods or services purchased with federal funds. The request for use of a noncompetitive procurement does not guarantee federal compliance nor is it a guarantee that the request will be approved. All procurement activities are subject to monitoring. The subgrantee must submit adequate documentation related to the request and maintain such documentation for recordkeeping and auditing purposes.

SUBGRANTEE NAME:	
School Year:	Grant Number:
Subgrantee Contact:	Phone Number:
Email:	Subaward Name:
Description of Requested Procurement	
Proposed Vendor or Contractor:	
Total Purchase Amount:	
Description of Goods/Services	
Provide a justification for why this procurement is a noncompetitive procurement. Must attach evidence to support this request.	
Requestor's Signature:	Date:
Requestor's Name (printed):	Title:
Business Official's Signature:	Date:
Business Official's Name (printed):	Title:
Procurement Official's Signature:	Date:
Procurement Official's Name (printed):	Title:

SCDE PROGRAM OFFICE USE ONLY

Approved

Denied

Returned for more information.

Office Name:	Date:
Reviewer's Signature:	
Reviewer's Name (printed)	
Notes:	



Full Documentation

Complete and thorough documentation for allowability includes:

- a strong justification explaining the applicability to the purpose of the grant,
- the allocability to the grant, and
- the reasonableness

Procurement documentation would include:

- authorized signatures,
- proof of competition (if applicable),
- the expected return on investment, and
- how this will be evaluated





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