

# Common Monitoring Findings and How to Avoid Them

ESSA Academy

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Dr. Greg King, Barret Leviner, Clint Palmer & Peggy Scott,  
Consolidated Oversight & Monitoring (COM) Team

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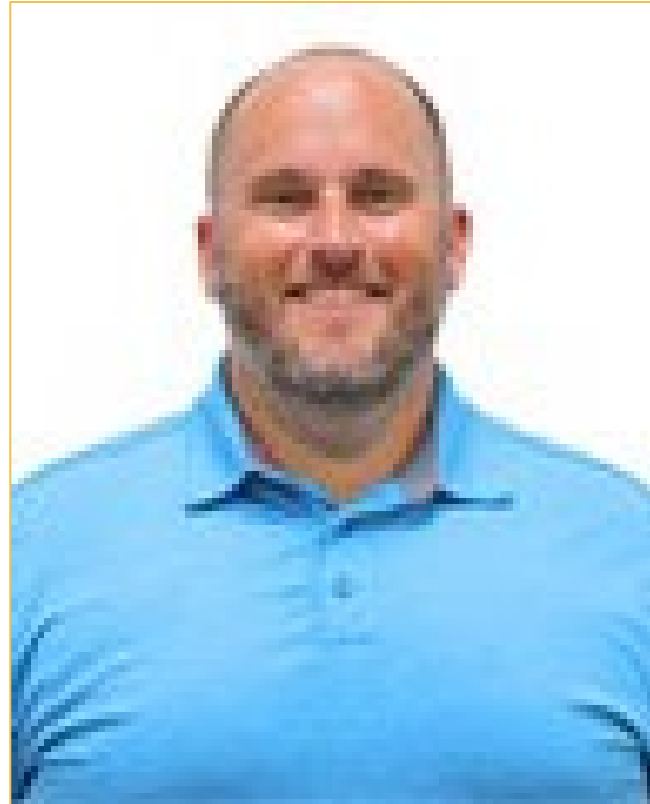
**SOUTH CAROLINA**  
**DEPARTMENT OF EDUCATION**

# Consolidated Oversight and Monitoring (COM) Team

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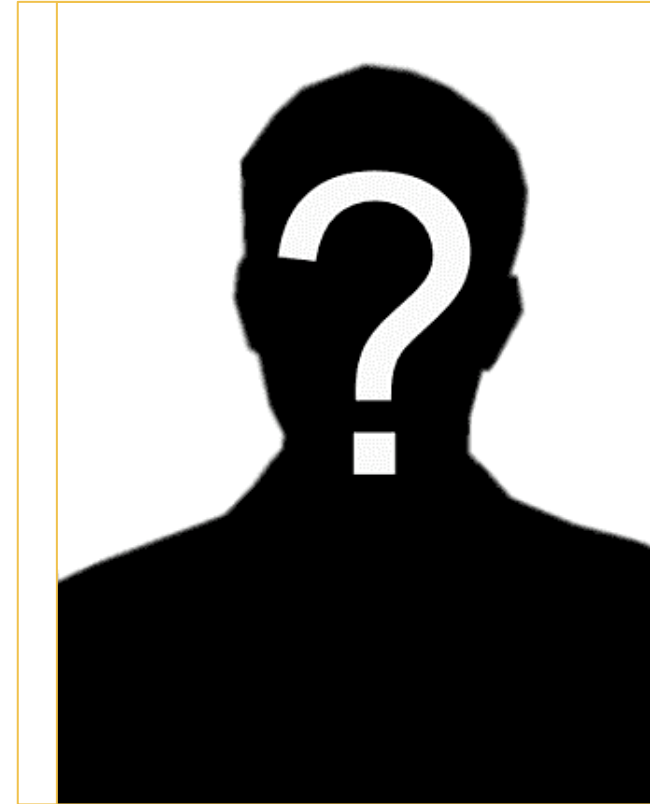
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# Recent Issues and Resolutions:

- Not Providing Quality Information Regarding Title I
- Not Providing an Adequate Level of Documentation
- Not Having Updated Policies and Procedures
- Not Having Adequate Transportation Policies and Procedures
- Not Using the Current Forms (Enrollment Survey & Home Language Survey, Best Interest Determination (BID), etc.)





# Not Providing Quality Information Regarding Title I

- An LEA's efforts to provide quality information regarding Title I as required in ESSA Section 1116 during the meetings were inadequate. The LEA's Federal Programs Director was referred to SCDE OFSA's Parent and Family Engagement liaison for technical assistance to ensure that the LEA's Family and Community Engagement programs were implemented with fidelity and met the requirements of ESSA.
- The LEA's Federal Programs Director also attended a parenting session at the SCATA Fall Conference to increase her knowledge of the Family and Community Engagement requirements.



# Not Providing an Adequate Level of Documentation

- An LEA did not have sufficient documentation of joint planning among programs funded by local, state, and federal sources in providing services to multilingual learners or evidence of the participation of ML personnel in IEP meetings for ML students who also qualified for special education including but not limited to documented invitations and signatures in IEP cumulative files as required in Title VI of the Civil Rights Act of 1964.
- The LEA provided a corrective action plan to SCDE OFSA/COM advising of the steps implemented to avoid non-compliance in the future. COM will review the LEA's documentation again during the 2024-25 school year to see evidence of implementation of the agreed-upon plan.



# Not Providing an Adequate Level of Documentation

## Cont'd.

- An LEA did not have sufficient documentation to support that the academic/content instruction for multilingual learners (MLs) is designed and implemented, fitting with an effective language instruction educational program that assists MLs in meeting the challenging state academic standards as required by Lau v Nichols (1974).
- The LEA's available documentation did not support the District's provision of classroom accommodations for all ML students as required pursuant to Title VI of the Civil Rights Act of 1964.
- The LEA provided a corrective action plan to SCDE OFSA/COM advising of the steps implemented to avoid non-compliance in the future. COM will review the LEA's documentation again during the 2024-25 school year to see evidence of implementation of the agreed-upon plan.
- In addition, the LEA was required to participate in professional development regarding the multilingual learner provided by the OFSA's Student Advocacy Access & Support (SAAS) Team.



# Not Having Updated Policies and Procedures

- An LEA's procurement procedures hadn't been updated to include SCDE's guidelines regarding the review and approval of non-competitive procurements to ensure adequate competition when using federal funds pursuant to 2 CFR 200.319, 2 CFR 200.320, and SCDE's August 4, 2023 Memo. SCDE OFSA/COM provided technical assistance to the LEA's Federal Programs Director regarding updating the LEA's procurement policies and procedures to reflect the SCDE's guidelines regarding non-competitive procurements.
- The LEA's updated procurement policies and procedures were subsequently provided to OFSA/COM.
- LEAs' policies and procedures must be reviewed at least every two years.



# Not Having Adequate Transportation Policies (Cont.d)

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- An LEA's written Foster Care and McKinney-Vento transportation policies and procedures required revisions pursuant to ESSA section 1112(c)(5)(B)(i) and 42 U.S.C. §11432(g)(3)(B)(i), (iii). The LEA's Federal Programs Director was referred to SCDE's McKinney-Vento Program Manager for technical assistance with updating the LEA's Foster Care and McKinney-Vento transportation policies and procedures.
- The LEA's updated Foster Care and McKinney-Vento transportation policies and procedures were subsequently provided to OFSA/COM.





# Not Using the Current Forms

- Ensure Enrollment Survey & Home Language Survey, Best Interest Determination (BID) forms, etc. are current.
- The LEA provided a corrective action plan to SCDE OFSA/COM advising of the steps implemented to avoid non-compliance in the future. COM will review the LEA's documentation again during the 2024-25 school year to see evidence of implementation of the agreed-upon plan.



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# QUESTIONS

# Consolidated Oversight & Monitoring Team Contact Information

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