

SUBRECIPIENT MONITORING

Oklahoma State Department of Education
Federal Programs
Office of Titles I, II, VI and X



MONITORING TEAM

Federal Programs-Office of Titles I, II, VI and X

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TODAY'S AGENDA

- Monitoring Overview and Process
- What's New - FY 2013 Monitoring
- Consolidation of Applicable Federal Programs
- Monitoring Process and District Preparation
- Desk or Onsite Monitoring
- Review Monitoring Tool

MONITORING OVERVIEW

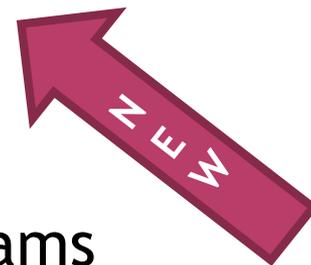
- Pursuant to Education Department General Administrative Regulations (EDGAR) § 80.40, monitoring and reporting program performance.
- Grantees (OSDE) are responsible for managing the day-to-day operation of grant and subgrant supported activities to assure compliance.
- OSDE and LEA subrecipients must comply with the Federal Single Audit Act and testing of expenditures in accordance with the Federal Compliance Supplement (OMB Circular A-133).

PURPOSE OF MONITORING

OSDE WILL PERIODICALLY MONITOR EACH LEA (DISTRICT) AND SELECTED SCHOOLS TO DETERMINE IF THE DISTRICT IS IN COMPLIANCE REGARDING THE IMPLEMENTATION OF PROGRAMMATIC REQUIREMENTS.

- Introduce OSDE's monitoring team and create a partnership with the LEA that fosters an effective desk and onsite reviews.
- Review the use of federal funds.
- Review the school/LEA's performance during the preceding two years, including the documented academic performance of its students.
- Assess the areas in which the school or LEA needs to revise its plan.

WHAT'S NEW FOR FY-2013



- Revised State Consolidated Federal Programs Review Plan
- A *three-year* monitoring cycle and LEA monitoring schedule
- Focus on consolidation of applicable federal grant programs

PROGRAMS TO BE MONITORED

- Title I, Part A-Improving Basic Programs Operated by Local Education Agencies
- Title I, Part C-Migrant Education Program
- Title I, Part D-Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk
- Title II, Part A-Preparing, Training, and Recruiting High Quality Teachers and Principals
- Title III, Part A-Language Instruction for Limited English Proficient and Immigrant Students
- Title VI, Part B-REAP-Flex/RLIS Program
- Title X, Part C-McKinney-Vento Homeless Education Program

MONITORING PROCESS AND PREPARATION

- The monitoring process is designed to assess the degree to which program requirements are being fulfilled so that OSDE can make recommendations when appropriate.

Desk Audit

- districts will receive notification via email of the due date for submitting required monitoring documents to OSDE via flash drive. During the desk audit, OSDE staff will review documentation and notify the district of the monitoring results.

On-site monitoring

- a conference call between the SEA and LEA will be conducted to confirm date and time of monitoring. Guidance regarding documentation required by OSDE during the monitoring process will also be provided.

DESK AUDITS

- Desk Audit-districts will receive notification of monitoring via email. Districts will submit required monitoring tool and supportive documentation to OSDE via flash drive.
- During the desk audit, OSDE staff will review the documentation and notify the districts within 30 days (from receipt of submission).

ONSITE VISIT

- Prior to the onsite visit the LEA will receive the following:
 - An e-mail/phone call announcing the visit
 - Monitoring Notification memo- The memo includes a list of schools that will be monitored
 - Monitoring Tool
 - Confirmation of dates and schedule of events
- The LEA (Superintendent or designee) will ensure that all documentation is organized, readily available, aligned to the monitoring tool and consistent by section and subsection.
- Contact the Titles Office if you have questions.

ONSITE VISIT OVERVIEW

- Start Time - TBA
- Visit conducted at central office
- All documentation (school/district) will be reviewed at the central office
- Monitors will interview LEA staff and review evidence to verify Federal State compliance (all applicable programs)
- Staff to have at meeting:
 - Federal Program Coordinator
 - Principal or designee of selected schools
 - Parent Involvement Coordinator
 - Homeless Liaison
 - ELL Coordinator
 - Neglected Part A Program Coordinator
 - Other Relevant Staff
- School visits conducted (as necessary)

DURING THE ONSITE VISIT

- The district federal programs contact person will make available to the OSDE monitoring team supporting evidence on a flash drive at the time of onsite monitoring.
- During the onsite monitoring visit, OSDE staff will review documentation. OSDE will interview district staff, site principals, parents, and other stakeholders as appropriate.
- This interview strategy will allow information to be gathered from a variety of sources to better evaluate the LEA's implementation of federal programs.

EXIT CONFERENCE WITH LEA

- An informal meeting with LEA designees will be held to summarize:
 - Monitoring fiscal and programmatic activities
 - Potential findings
 - Recommendations or suggestions
 - Timelines for developing the monitoring report

POST-ON SITE VISIT PROTOCOL

- Written Preliminary Monitoring Report
 - 30 Days (from the date of onsite visit)
- LEA Response
 - 30 Days (from receipt of SEA Preliminary Report)
- Final Report from OSDE
 - 30 Days from the date of onsite visit.

MONITORING TOOL COVER PAGE

Date of On-site Monitoring _____		Submission Date (Desk Audit Only) _____	<input type="checkbox"/> Desk <input type="checkbox"/> On-site
County Name/County Number _____		District Name/District Number _____	
Total Districtwide Number of Teachers _____ Total Districtwide Number of Students _____ Total Number of Sites: ES _____ MS _____ HS _____		Total Districtwide Number of Title I Teachers _____ Total Districtwide Number of Title I Students _____ Total Title I ES Sites _____ MS _____ HS _____	
District Superintendent Signature _____			
District Federal Programs Officer Signature _____			
Federal Duns Registration # _____		Expiration Date: _____	
Applicable funding sources to be monitored (Check all that apply)		Complete all that apply or NA (Not Applicable)	
<input type="checkbox"/> Title I A		Participation in Consolidation of Funds Pilot – Number of School(s): _____	
<input type="checkbox"/> Title I C		<i>Designation: Total Priority Sites: _____ Total Focus Sites: _____</i> <i>Total Targeted Intervention Site(s) _____</i>	
<input type="checkbox"/> Title I D		Total Number of Schools Operating a Title I Schoolwide Program _____	
<input type="checkbox"/> Title IIA		Total Number of Schools Operating a Title I Targeted Assistance Program _____	
<input type="checkbox"/> Title III A		Date of Most Recent Single Audit Completion _____	
<input type="checkbox"/> Title VI B REAP-FLEX/RLIS		Private School Participation: Number of Private Schools Receiving Federal Funding _____	
<input type="checkbox"/> Title X C		Number of Private School Students Served _____	

Completing the *Monitoring Tool Cover*
Page

FINANCIAL AND PROGRAMMATIC MONITORING TOOL

SECTION II: TITLE I, PART A FISCAL AND PROGRAM REQUIREMENTS <i>Parent Involvement</i>		
Compliance Requirement <i>NCLB §1111(h), §1116(b)(1)(D)(E); §1112(g)(4), §1118 ESEA Flexibility Waiver</i>	Evidence	District Narrative Statement
GUIDING QUESTIONS		
Describe how the district is <u>using funds</u> reserved for parental involvement on the District Set aside page (1% for grant over \$500,000 is required) to implement activities described in the application. (95% of these funds are used at the school level).	<ul style="list-style-type: none"> Title I section of Consolidated Application Title I Plan Parental involvement activity sign-in sheets, meeting agendas, etc. 	
Describe how the district developed, in conjunction with parents, a written parental involvement policy and has distributed the written policy to parents of participating students. The process should involve parents on an ongoing basis.	<ul style="list-style-type: none"> Written parental involvement policy and documents that support implementation and distribution of the policy 	
<p>The district has jointly developed a school-parent compact with parents of participating students in targeted assistance programs and parents of students in schoolwide programs.</p> <p>The district has held its annual Title I invitational meeting for parents of children participating in the Title I program.</p>	<ul style="list-style-type: none"> School-parent-student compact Process for developing school-parent student compact Minutes and the sign-in sheets of the annual meeting Correspondence inviting parents to attend annual meeting 	
Describe how the needs of parents are determined for Title IA parent training programs. Sec. 1118(e)	<ul style="list-style-type: none"> Title I Program Plan Parent Survey 	
<p>The district has provided parents of Limited English Proficient (LEP) students with opportunities for parent training, and formatted in a language that is understandable to the parents.</p> <p>Each Title I school meets the requirements of the Parents' Right-to-Know provision. (Letters are sent to all parents at the beginning of each school year right to inquire about the qualifications of teachers.)</p> <p>Letters are sent by November</p>	<ul style="list-style-type: none"> Review documentation to verify that parents of LEP students were provided an opportunity to participate and that materials exist in a language that is understandable Review correspondence in native language Parents' Right-to-Know letter Parental requests for teachers' and 	

*The Fiscal and Programmatic Monitoring Tool
Section with Grant Program Name*

FINANCIAL AND PROGRAMMATIC MONITORING TOOL - GUIDE

SECTION I: OVERARCHING REQUIREMENTS (OR)

FEDERAL GRANTS PROGRAM PLAN – GENERAL CROSS-CUTTING PROVISIONS

NOTE: *This section may apply to all federal fund sources.*

Compliance Requirement		Legal Authority	Evidence	District Narrative Statement
GUIDING QUESTIONS				
OR 1	Does the district have an approved Consolidated Federal Programs Application Workbook?	<i>NCLB §§1112, 1113, 1124, 2122</i>	<ul style="list-style-type: none"> Approved Consolidated Application Workbook for federal funds, with all budget amendments. Signed and Submitted Assurances 	
OR 2	Provide evidence of consultation with the Title I district committee prior to utilizing funds at the school site(s). Describe how the district Title I committee develops the Consolidated Application Workbook prior to making school site allocations.	<i>NCLB §§1112, 1113, 1124, 2122</i>	<ul style="list-style-type: none"> List of members, agendas, meeting minutes. Documentation of board approval (board minutes and signed statement of assurances). Interview with Federal Programs Director (On-site monitoring only). 	
OR 3	Describe the activities to be carried out and how the activities align with the comprehensive needs assessment.	<i>NCLB §§1112, 1113, 2122, 2414, 3115, 4114, 5133,</i>	<ul style="list-style-type: none"> Title I Consolidated Workbook, data and materials used in the needs assessment process. 	
OR 4	Describe how the supplemental activities align with challenging state academic content standards and state assessments.	<i>NCLB §§1112, 2122, 2414, 3115, 4114-4115, 5133, 6223</i>	<ul style="list-style-type: none"> Review academic needs to ensure that they target the schools and students with the greatest need for services, as supported by the findings of the data-based needs assessment. 	
OR 5	Provide evidence that the district focuses federal funds on programs, services, and materials so that specific measurable goals and objectives are reached thereby increasing student achievement. Describe the target population, areas for improvement, identification of the data source, analysis of the data, areas to be measured, the measurement tool, specific school performance targets, prior year's outcomes, and the person(s) responsible	<i>NCLB §§1112, 1113, 2414, 4114, 5133</i>	<ul style="list-style-type: none"> Review the description of the selected areas for improvement to ensure that the required information 	

Legal Requirement(s)
(Rules, Laws and Statutes)

FINANCIAL AND PROGRAMMATIC MONITORING TOOL GUIDE (CONT.)

SECTION I: OVERARCHING REQUIREMENTS (OR)				
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OR 4	Describe how the supplemental activities align with challenging state academic content standards and state assessment.	NCLB §§1112, 2122, 2414, 3115, 4114-4115, 5133	<ul style="list-style-type: none"> Review academic needs to ensure that they target the schools and students with the greatest need for services, as supported by the 	
OR 5	Provide evidence of federal funds materials so that and objective increasing state Describe the improvement source, analysis measured, the school performance targets, prior year's outcomes, and the person(s) responsible		<ul style="list-style-type: none"> needs assessment. 	

Guiding Question/Compliance Requirements
(The answers to these questions will determine the level of compliance)

FINANCIAL AND PROGRAMMATIC MONITORING GUIDE (CONT.) -

SECTION II: TITLE I, PART A FISCAL AND PROGRAM REQUIREMENTS <i>Parent Involvement</i>		
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The district has provided parents of Limited English Proficient (LEP) students with opportunity to participate in Title I activities. (Documentation should be formatted in a language the parents can understand.)	<ul style="list-style-type: none"> Review documentation to verify that parents of LEP students have provided an opportunity to participate and that 	
Each Title I school meets the Right-to-Know provision. (The beginning of each school year, the district shall provide parents the right to inquire about the qualifications of their child's teachers.)		
Letters are sent by November 15th to all parents of children in the Title I program.		

Potential Evidence
Documentation of the Compliance Indicators
and Narrative Statement
Supportive Evidence - current fiscal year sample

DOCUMENT ORGANIZATION INSTRUCTIONS

- Districts are required to submit a random sampling of supportive documentation for each applicable program. The preferred method for receiving this documentation is in an organized format submitted on flash drive. Suggestions for submitting documentation:
- Create a Word document Cover Page that includes the district name and county district number. Create a main folder (*FY2013 Monitoring*), within this folder and name each folder for each applicable program, i.e. Overarching, Title I, Title I D, etc.
- Within the main folder create a folder for each applicable indicator in the Monitoring tool. Districts can copy and paste each Section headings in the Monitoring Tool.
- Name each document by the supportive evidence for each program. If supportive evidence was previously submitted in another folder, indicate in which folder the supportive evidence was previously submitted.
- Keep documentation in the same order as the Sections are listed in the Monitoring Tool.
- If the district uses more than one flash drive, number them in sequential order.

DOCUMENT ORGANIZATION INSTRUCTIONS (EXAMPLE)

DISTRICT NAME COUNTY DISTRICT NUMBER 2013

Overarching

-  District policy manual
-  Consolidated Workbook
-  Etc.

Title I A

-  Parent's Right to Know Letter
-  Time and Effort Logs
-  Etc.

Title I C

-  District Recruitment Policy
-  CNA document
-  Etc.

Title I D

-  Inventory list
-  Annual October Caseload Count
-  Etc.

Title II A

-  Highly Qualified Teacher Report
-  Class Size Reduction documentation
-  Etc.

DOCUMENT ORGANIZATION INSTRUCTIONS (EXAMPLE)

Title III

-  Testing Accommodation
-  W-APT score data
-  Etc.

Title VI B

-  Expenditure Reports
-  Inventory list
-  Etc.

Title X

-  Data Collection
-  Contracts/Agreements
-  Etc.

SUBRECIPIENT MONITORING COMMON FINDINGS

- Supplement vs. Supplant
- Incomplete Planning Meeting Evidence
 - It is recommended that all meetings should be accompanied with agendas, sign-in sheets denoting names and positions, and minutes for each meeting. In addition, meeting agendas in which federal programs planning is conducted must be unique to the entitlement. Meeting agendas which only describe certain topics, fail to meet the requirements necessary for specific planning requirements of entitlement law. Meetings should reflect that topics such as Title I Schoolwide, data, program research etc. are being discussed.
- Adequate evidence that parents have been involved in entitlement program planning
 - All required planning meetings involving parent participation should be accompanied with sign-in sheets denoting the parent names. It is a requirement of federal funds grantees that parents participate in all stages of program planning and that documentation is archived by the LEA to support parent involvement.

SUBRECIPIENT MONITORING COMMON FINDINGS

- Homeless list
 - FINDING: A review of LEA records indicated that the LEA had no policy, procedures, or guidelines for identifying, enrolling, and addressing the educational needs of homeless children and youth. It is noted that the LEA had made a fund reservation of Title I, Part A funds for Homeless. CORRECTIVE ACTION: The LEA must remit copies of procedures and guidelines for identifying and enrolling homeless children. These policies must provide assurance that homeless children have access to activities and programs that address their educational needs and do not inhibit comparable services to students so identified.
- Schoolwide approval letters
 - FINDING: On the day of the visit, the LEA was cited with a finding of partially implemented (PI) for Section II-1. During a review of the LEA's documentation, it was discovered that the district did not have a Schoolwide approval letter from the State Agency. Currently the LEA is operating Title I Schoolwide Projects at both of its campuses. CORRECTIVE ACTION: The LEA must contact the secure the necessary approval letter for the operation of a Title I Schoolwide Project. This authorization will verify that the agency has reviewed all relevant requirements pertaining to the LEA's status as a Title I schoolwide and will satisfy aforementioned area of non-compliance.

COMMON FINDINGS AND EXAMPLES CONT'D

- Excessive district fund reservations
 - The district plan as written gives the false appearance of reservation of funds at the district level. The district is advised to allocate all supplemental funds to schools and only place in the district plan an amount that is reasonable and necessary to administer the program.
- Incomplete equitable services documentation
 - The district has made contact with four Private Schools to notify each of the rights of students and teachers to benefit from federal entitlement funds; however, the contact was not timely. Private schools choosing to participate were therefore unable to complete the consultations necessary to begin an educational program in a timely fashion. The LEA was counseled regarding the timeliness of their responsibility in contacting private schools and will ensure that in the future the notices to private schools will be conducted each spring in order that sufficient time will exist to adequately consult and plan for programming.

COMMON FINDINGS AND EXAMPLES CONT'D

- School level compliance review
- Unallowable expenditures
 - It is recommended that the district establish (or re-visit) a systematic internal control process for allowable costs and programmatic restrictions for entitlement funds. As the grant recipient, it is the district's responsibility to review all entitlement expenditures for allowable uses prior to submission of the plan to the SEA.
 - In a review of Title I expenditures in the district plan revealed unallowable expenditures for administrative conferences. The district was advised to reimburse Title I for the amount of these conferences, and pay for those conferences with an allowable funding source.
 - The LEA must continue to review actions in the plan.
 - During the on-site review of the Expenditure Audit Trail for Title I Funds it was observed that Title I funds had been used to reimburse expenditures for unallowable activities. The LEA was informed at that time that the use of Title I funds for this activity is not allowable.

CLOSING -

- The three-year monitoring list was modified to make sure that no district would have a Federal Programs Monitoring within the same school year.
- The items listed below were revised and will be posted on the OSDE website:
 - Three-Year Monitoring Schedule
 - 2012-2013 Monitoring Schedule
 - 2012-2013 Monitoring Tool
 - 2012-2013 Training PowerPoint
 - 2012-2013 Training Schedule Memo
 - 2012-2013 Training Agenda

RESOURCE INFORMATION

Please see the new Oklahoma State Department of Education Website for additional information.

Use the following links:

USDE

<http://www2.ed.gov/about/offices/list/oese/sasa/index.html>

OMB CIRCULAR A-133

http://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2012

OSDE:

Federal Programs

<http://www.ok.gov/sde/federal-programs>

Academic Accountability and Assessment

<http://ok.gov/sde/accountability-assessments>

Titles IC and IIIA

<http://ok.gov/sde/title-i-part-c>