

## Fiscal Risk

**Fiscal Risk** Ensure fiscal accountability at each phase in the distribution and use of the IDEA Part B funds.

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### Purpose

Based on the district's Fiscal Risk score, the district has been assigned a risk category which has monitoring requirements (see exception below). Please refer to the District Special Education Risk Score report for results. This toolkit is designed to guide the district in a review of its special education program. Please complete the toolkit in EdPlan.

**Identify** root cause by answering the Guiding Questions and analyzing data with a team.

**Develop** Improvement plan including professional development aligned to the indicator.

**Submit** assurance statement signed by Superintendent and Special Education Director.

**Review** progress of the improvement plan twice.

**Submit** professional development documentation summary and sign-in sheets.

**Exception:** Additional activities are required if found to be noncompliant and/or not have met state target in the same focus area/indicator for three consecutive years and/or have been identified as a DMR Level 3 or DMR Level 4 in the same focus/target area. The district will be notified for additional required activities.

Activities are developed on a tiered system based on the number of consecutive years with a growth measure built in. Refer to the General Supervision System for additional information.

**Tier 1: 3<sup>rd</sup> year** of consecutive noncompliance and/or not meeting target in one or more areas. Complete the required additional activities below:

- Review the past two years' root cause findings to assist with developing an improvement plan.
- Utilize 615 funds to address improvement plan implementation (fund amount/percentage is determined by (SDE)

**Tier 2: 4<sup>th</sup> year** of consecutive noncompliance and/or not meeting target in one or more areas below. Complete the required activities below:

- Review the past two years' root cause findings to assist with developing an improvement plan.
- Utilize 615 funds to address improvement plan implementation (fund amount/percentage is determined by SDE).
- Develop/utilize a Parent Advisory Board, meet quarterly, discuss root cause and improvement plan, and how the 615 funds will be utilized.

**Tier 3: 5<sup>th</sup> plus** year of consecutive noncompliance and/or not meeting target in one or more areas below. Complete the required activities below:

- Review the past two years' root cause findings to assist with developing an improvement plan. One SDE staff or contract with an outside representative to participate in team planning to support the identification of the root cause, data review, and the plan for improvement.
- Utilize 615 funds to address improvement plan implementation (fund amount/percentage is determined by SDE).
- Develop/utilize a Parent Advisory Board, meet quarterly, discuss root cause and improvement plan, and how the 615 funds will be utilized to support the plan and share progress made towards the plan.
- Invite parents to a school board meeting to discuss the plan for improvement and data trends for the past three years related to the area.

If 10% or more growth is demonstrated while implementing the plan from the previous year, the district will remain at Tier 1 for the current year. If the district drops down below the gain the district will move to the next tier below current placement.

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### **Fiscal Risk Toolkit Process**

- **Establish a Team** - Identify site-based personnel (administrative, instructional, specialized, and /or support staff) to participate as members of this team. The team should consist of experts in this area with the ability to implement improvement strategies.
- **Review guiding questions and gather important supporting documents** - Prior to meeting, provide each team member a copy of the toolkit, allowing them to become familiar with the tool and gather supporting documentation describing the district's current practices and procedures. Review the progress made on last school year's Improvement Plan if the district was identified as Moderate or High-Risk last year.
- **Identify Data** - Prior to meeting, identify all relevant data needed to assist the team through the review process. Review the recommended data sources below as well as any additional data the team identifies as relevant.

### **Policy and procedures regarding:**

- IDEA funding requirements
- Excess Cost

- Maintenance of Effort (MOE)
- Time and Effort
- Fiscal Internal Policies
- Auditing Procedures
- Inventory, track and label equipment purchased with federal funds
- Training IDEA budget application and expenditure report process for responsible party
- Timelines for LEA Assurance & Agreement submissions

**Meet and review practices and procedures.**

- Review results of last year’s data to determine if the current plan is effective or needs revising (if the district did not meet target for fiscal risk last year).
  - Complete a root cause analysis by answering the guiding questions and analyzing collected data.
  - Provide a summary describing how the team determined factors linked to the root cause.
  - Develop and implement an improvement plan to improve fiscal risk.
  - Identify professional development to support the improvement plan (professional development must align with area of need identified and must be provided after the Improvement plan is submitted.
  - Establish monitoring tools needed to measure effectiveness of the improvement plan.
- **Continued monitoring and improvement.** Once the plan has been implemented, the team will meet again to analyze results, identify areas of improvement, and adjust the plan as needed to move towards improving performance.

**Fiscal Risk Root Cause**

**Step 1: Who is on your Team?**

List each team member’s role as well as full name in the box below. Required team members are the Superintendent, the Special Education Director, and Administrative Personnel assigned to the area of concern. Optional team members to include may be an Encumbrance Clerk, Superintendent’s Administrative Assistant, member of the

Data Team, and Staff members working with funding.

**Step 2:** As a team, consider why the district was identified as a moderate or high-risk by answering the following questions. Data and other information the team feels is relevant should also be considered.

1. Describe the progress made on last school year's improvement plan if the district was identified as moderate or high-risk last year. Describe the progress made towards the next steps for improvement.
2. How does the district monitor the use of Federal IDEA funds and State funding for special education? How effective are these policies at ensuring federal funding requirements, but does not supplant State funds?
3. If the district incurred one or more Maintenance of Effort (MOE) penalties in the past five years, why and how did it happen? How is the district working to meet MOE requirements? How are the expenditures of funds monitored to ensure that the district spends an equal amount of state and/or local funds on special education as the previous fiscal year?
4. Describe the policies utilized to ensure equipment purchased with IDEA funds are used to enhance the educational outcomes for students with disabilities? Describe the policies for labeling, tracking location, preventing misuse, and disposal of equipment.
5. Late claim submissions must be taken to Oklahoma State Board of Education for approval. If the district has submitted a late claim in the past five years explain why. Describe the policies and procedures to ensure timely submission of all claims.
6. Describe the training provided to the director of special education (or the individual/position who handles IDEA budgets and/or claims) to ensure that the person responsible understands the IDEA fiscal and compliance requirements.
7. Describe the policies and procedures that ensure the Assurances and LEA Agreement are submitted by the annual due date of June 30. Explain the procedures to ensure the person responsible meets the timeline and information is gathered and entered.

**Step 3: Summarize** the responses to the questions above, identifying the factors that the team believes are most linked to the root cause in the areas identified. Provide data/information to assist in identifying the root cause. Determine the root cause and provide summary.

## **Fiscal Risk Improvement Plan**

**Develop** an improvement plan for Fiscal Risk.

**Include** professional development as a part of the plan.

**Describe** the professional development needed to assist with improving this indicator.

**Identify** area of focus, who will attend, and date professional development is provided.

**Submit** the professional development documentation summary and sign-in sheets.

**Describe** the progress review activity and/or data source for determining effectiveness of the improvement plan.

**Identify** the person(s) responsible for monitoring the progress of the improvement plan. Enter the name, position, and responsibilities of the person(s) monitoring the plan.

### **Assurance Statement:**

**Submit** an assurance statement ensuring the district's improvement plan for Fiscal Risk will be implemented and monitored. Provide the assurance statement signed by the Superintendent and Special Education Director.

### **First Progress Review**

**Analyze** the collected data identified in the improvement plan as well as any other data gathered to measure the effectiveness of the improvement plan. If the data sources analyzed do not demonstrate progress towards improving the indicator, the district may continue or amend the improvement plan. Provide justification for the decision to either continue or amend the plan.

### **Guiding Questions for the first progress review:**

1. Has the identified team membership changed since the improvement plan was created?
2. Are any additional members needed?
3. What data is the team using to monitor improvement plan's effectiveness?
4. Describe how the improvement plan was implemented. Was it enacted as planned or were changes made? Has the team encountered any challenges or unforeseen obstacles in implementing the improvement plan?
5. What additional activities should be added to the district's improvement plan?
6. What policies, practices, and/or procedures will be changed or implemented?
7. What strategies have been used? Will these continue to be used?

## **Professional Development**

1. Provide a summary of the professional development completed.
2. How does the pd relate to the root causes identified by the team?
3. What did the team gain from this pd?
4. How does the LEA need to update and implement practices/policies?
5. What are the next steps to improve results for this indicator?

### **Provide professional development summary.**

**Submit Professional Development** sign-in sheets aligned to summary. Professional development sign-sheets must include date and title.

**Upload to the LEA Document Library>Compliance tab in EdPlan**

### **First Progress Review**

**Analyze** the collected data identified in the improvement plan as well as any other data gathered to measure the effectiveness of the improvement plan. If the data sources analyzed do not demonstrate progress towards improving the indicator, the district may continue or amend the improvement plan.

Provide justification for the decision to either continue or amend the plan.

### **Guiding Questions for the final progress review:**

1. What data is the team using to monitor growth toward the intended outcomes? Does the data demonstrate growth or are other sources of data needed? Please explain.
2. Describe how the improvement plan was implemented. Was it enacted as planned or were changes made? Has the team encountered any challenges or unforeseen obstacles in implementing the improvement plan?
3. What additional activities should be added to the district's improvement plan?
4. What policies, practices, and/or procedures will be changed or implemented?
5. What strategies need to be carried into the following school year?